

September 14, 2012

Mr. Gregory T. Gibson President, CEO,
and CNO
UniStar Nuclear Energy, LLC
750 E Pratt Street, 14th Floor
Baltimore, MD 21202

SUBJECT: NRC INSPECTION REPORT NO. 05200016/2012-201 AND NOTICE OF
VIOLATION

Dear Mr. Gibson:

From July 30 - August 2, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff conducted an inspection at the UniStar Nuclear Energy, LLC (UNE) facility in Baltimore, MD. The purpose of the limited scope inspection was to assess UNE's compliance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 21, "Reporting of Defects and Noncompliance," and selected portions of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." The enclosed report presents the results of this inspection. This NRC inspection report does not constitute NRC endorsement of UNE's overall quality assurance or 10 CFR Part 21 programs.

Based on the results of this inspection, the NRC has determined that violations of NRC requirements occurred. The enclosed Notice of Violation (Notice) cites these violations, and the subject inspection report describes in detail the circumstances surrounding them. The NRC is issuing this Notice because the agency's inspection team identified examples in which UNE failed to adequately implement aspects of its control of quality records and corrective action program in accordance with Appendix B to 10 CFR Part 50.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC review of your response to the Notice will determine if further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.390 "Public Inspections, Exemptions, Requests for Withholding" of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a

bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information would create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Sincerely,

/RA/

Kerri A. Kavanagh, Chief
Quality Assurance Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No. 05200016

Enclosures:

1. Notice of Violation
2. Inspection Report No. 05200016/2012-201
and Attachment

bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information would create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Sincerely,

/RA/

Kerri A. Kavanagh, Chief
Quality Assurance Branch
Division of Construction Inspection
and Operational Programs
Office of New Reactors

Docket No. 05200016

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and Attachment

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(Revised 08/14/2012)

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NOTICE OF VIOLATION

UniStar Nuclear Energy, LLC
Baltimore, MD

Docket No. 05200016
Inspection Report Number: 2012-201

During a U.S. Nuclear Regulatory Commission (NRC) inspection conducted at the UniStar Nuclear Energy, LLC (UNE) facility in Baltimore, MD on July 30 – August 2, 2012, NRC inspectors identified violations of NRC requirements. In accordance with the NRC Enforcement Policy, the violations are listed below:

- A. Criterion V, "Instructions, Procedures, and Drawings," of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," states, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings.

Criterion XVII, of Appendix B to 10 CFR Part 50, "Quality Assurance Records," requires, in part, that sufficient records shall be maintained to furnish evidence of activities affecting quality.

Contrary to the above, as of August 2, 2012, UNE failed to prescribe the QA Records program by documented instructions, procedures, or drawings. Specifically, UNE is in the process of transitioning between two electronic records management systems (RMS). UNE retired their old electronic records management system in May 2012 and failed to proceduralize its interim QA records management program over a period of 2 months. UNE RM-1, "Records Management Program," describes how the new electronic RMS will be used once it is fully implemented; however, UNE RM-1 failed to include the following provisions:

1. Interim procedures to recover, identify, index, authenticate, validate, verify, retain and retrieve QA records, from Team Center, the old electronic RMS and SharePoint, the new electronic RMS, that is not yet fully implemented.
2. Interim procedures for maintaining hard copies of QA records

These issues have been identified as Violation 05200016/2012-201-01.

This is a Severity Level IV violation (Section 6.5.d).

- B. Criterion XVI, of Appendix B to 10 CFR Part 50, "Corrective Action," states in part that "Measures shall be established to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected."

UNE Quality Assurance Program Description, Topical Report No. UN-TR-06-001-A, "Quality Assurance Program Description – UniStar Nuclear Energy QAPD," Revision 2, dated November 30, 2010, Section 16, "Corrective Action," states, in part, that "UNE has established the necessary measures and governing procedures to promptly identify,

control, document, classify and correct conditions adverse to quality. UNE procedures assure that corrective actions are documented and initiated following the determination of conditions adverse to quality in accordance with regulatory requirements and applicable quality standards.”

UNE-CA-1-101, “Corrective Action Program (CAP) Procedure,” Revision 0, dated May 15, 2012, states, in part, that “For each [corrective action], assign a Responsible Individual (RI) and an achievable and timely due date...Perform the assigned Corrective Action or CAPR prior to the assigned due date.” CA-1-101 also states, in part, that the condition report owner shall, “review completed corrective actions... for adequacy in addressing the identified condition [and] verify that the corrective actions... have been completed and implemented.”

Contrary to the above, as of August 2, 2012, UNE failed to promptly correct conditions adverse to quality and to correct repetitive conditions adverse to quality. Specifically for a sample of 65 condition reports, UNE had not closed ten corrective actions by the established due date or establish new due dates for completion of corrective actions. The corrective actions were open for a period of one month to one year after the established due dates.

These issues have been identified as Violation 05200016/2012-201-02.

This is a Severity Level IV violation (Section 6.5.d).

Pursuant to the provisions of 10 CFR 2.201, “Notice of Violation,” UniStar Nuclear Energy, LLC is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-001 with a copy to the Chief, Quality Assurance Branch, Division of Construction Inspection and Operational Programs, Office of New Reactors, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation; and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Because your response will be made available electronically for public inspection in the NRC’s Public Document Room or from the NRC Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>, to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information.

If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, "Posting of Notices to Workers," you may be required to post this Notice within two working days of receipt.

Dated this 14th day of September, 2012

**U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF NEW REACTORS
DIVISION OF CONSTRUCTION INSPECTION AND OPERATIONAL PROGRAMS
VENDOR INSPECTION REPORT**

Docket No.: 05200016

Report No.: 05200016/2012-201

Vendor: UniStar Nuclear Energy, LLC
750 E Pratt Street
14th Floor
Baltimore, MD 21202

Vendor Contact: Mr. Gregory T. Gibson
President, CEO and CNO
Greg.Gibson@unistarnuclear.com
410-369-1905

Nuclear Industry Activity: UniStar Nuclear Energy, LLC (UNE), headquartered in Baltimore, MD, is a subsidiary of the Electricite de France (EDF) Group and was formed as a joint enterprise between Constellation Energy and Areva to introduce the Evolutionary Power Reactor (EPR) to the U.S. Market. In 2007, UNE submitted the Calvert Cliffs Nuclear Power Plant Unit 3 combined operating license (COL) application to the U.S. Nuclear Regulatory Commission (NRC) in accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Part 52, "Licenses, Certifications, and Approvals for Nuclear Power Plants." The COL, if approved, will authorize UNE to build and operate an Areva U.S. EPR at UNE's Lusby site in Calvert County, MD.

Inspection Dates: July 30 - August 2, 2012

Inspectors: Samantha Crane CMVB/DCIP/NRO, Team Leader
Frank Talbot CQAB/DCIP/NRO
Jonathan Ortega CMVB/DCIP/NRO
Andrea Keim CQAB/DCIP/NRO, Training

Approved by: Kerri Kavanagh, Chief
Quality Assurance Branch
Division of Construction Inspection
& Operational Programs
Office of New Reactors

EXECUTIVE SUMMARY

UniStar Nuclear Energy, LLC
05200016/2012-201

The U.S. Nuclear Regulatory Commission (NRC) conducted this inspection to verify that UniStar Nuclear Energy, LLC (UNE), implemented an adequate quality assurance program that complied with the requirements in Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities." The inspection also verified that UNE implemented a program under 10 CFR Part 21, "Reporting of Defects and Noncompliance," that meets the NRC's regulatory requirements. The inspectors conducted the inspection at the UNE facility in Baltimore, MD, on July 30 - August 2, 2012.

The following regulations served as the bases for the NRC inspection:

- Appendix B to 10 CFR Part 50
- 10 CFR Part 21

The inspectors implemented Inspection Procedure (IP) 35017, "Quality Assurance Implementation Inspection," dated July 29, 2008, and IP 36100, "Inspection of 10 CFR Part 21 and Programs for Reporting Defects and Noncompliance," dated February 13, 2012, while conducting this inspection.

The NRC had not previously performed any inspections at the UNE facility in Baltimore, MD, in support of the Calvert Cliffs Nuclear Power Plant Unit 3 combined license.

The results of this inspection are summarized below.

Quality Assurance Records

The inspectors found, with one exception, that the implementation of the UNE quality assurance records program was consistent with the regulatory requirements in Criterion XVII, "Quality Assurance Records," of Appendix B to 10 CFR Part 50 and the provisions in the UNE Quality Assurance Program Description and associated industry guidelines.

The inspectors identified Violation 05200016/2012-201-01 for failing to establish procedures for the interim records management program. UNE-RM-1, "Records Management Program," did not provide interim guidance to recover, identify, index, authenticate, validate, verify, retain and retrieve records from the electronic records management system before SharePoint is fully implemented, and did not provide interim procedures for maintaining hard copies of quality assurance records.

Corrective Actions

The inspectors reviewed a sample of 65 condition reports and associated corrective actions, apparent cause evaluations, common cause analyses, and root cause analyses. Based on the limited sample of condition reports and associated corrective actions reviewed, the inspectors concluded that the implementation of the UNE program for corrective actions was not consistent with the regulatory requirements in Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. Specifically, UNE initiated and closed several condition reports related to late

evaluations or closure of condition reports. Subsequently, the inspectors identified six condition reports that had ten associated corrective actions that exceeded their due dates and had not received approval to extend the timelines for closure. This issue demonstrates UNE's failure to promptly correct conditions adverse to quality. Therefore, the inspectors issued Violation 05200016/2012-201-02 for failure to promptly correct conditions adverse to quality.

10 CFR Part 21

The inspectors found that UNE appropriately translated the requirements in 10 CFR Part 21 into implementing procedures and, for those activities reviewed by the inspectors, implemented them as required by UNE procedures. No findings of significance were identified.

Organization and Quality Assurance Program

The inspectors found that UNE's organization conformed to the requirements in Criterion I, "Organization," of Appendix B to 10 CFR Part 50. UNE was effectively implementing its quality assurance policies and procedures within its scope of work related to the Calvert Cliffs Nuclear Power Plant Unit 3 combined license. In addition, the inspectors found that UNE's quality assurance program requirements conformed to the requirements of Criterion II, "Quality Assurance Program," of Appendix B to 10 CFR Part 50 and that for the sample of documents reviewed, UNE was effectively implementing its quality assurance policy and procedures for the quality assurance program. No findings of significance were identified.

Oversight of Contracted Activities

The inspectors concluded that UNE's implementation of its procurement document control program and its control of purchased material, equipment, and services was consistent with the regulatory requirements in Criterion IV, "Procurement Document Control," and Criterion VII, "Control of Purchased Material, Equipment, and Services," of Appendix B to 10 CFR Part 50 and with its quality assurance policy and procedures. No findings of significance were identified.

Audits

The inspectors concluded that UNE's implementation of its internal audit program was consistent with the regulatory requirements in Criterion XVIII, "Audits," of Appendix B of 10 CFR Part 50 and the provisions in the UNE quality assurance program description and associated implementing procedures. No findings of significance were identified.

REPORT DETAILS

1. Quality Assurance Records

a. Inspection Scope

The U.S. Nuclear Regulatory Commission (NRC) inspectors reviewed the implementation of the UniStar Nuclear Energy, LLC (UNE) quality assurance (QA) records program. Specifically, the inspectors reviewed the policies and procedures that govern the UNE records process to verify compliance with Criterion XVII, "Quality Assurance Records," of Appendix B to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50. In addition, the inspectors discussed the records program with members of the UNE management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

Procedure UNE-RM-1, "Records Management Program," Revision 0, dated May 31, 2012 describes the UNE QA records program using a new Sharepoint records management system (RMS).

At the time of this inspection, the inspectors noted that UNE recently retired its electronic Team Center (TC) RMS and was in the process of converting to the new SharePoint electronic RMS. UNE had self-identified that the TC RMS did not meet Criterion XVII of Appendix B of 10 CFR Part 50, NQA-1-1994 edition, "Quality Assurance Requirements for Nuclear Facility Applications," and Nuclear Information Management Association (NIRMA) Technical Guidelines (TG) 11 and 15. UNE documented the issues with TC RMS in two condition reports (CR) 2011-151 and 2012-057 that were still open at the time of the inspection. The inspectors noted that the findings in the two CRs were significant because UNE lost control of approximately 4000 QA records in hundreds of TC RMS folders, where the index location of these QA records could not be identified.

To correct the conditions adverse to quality identified in CR-2011-151 and CR-2012-057, UNE developed a new electronic SharePoint RMS to properly store, manage, authenticate, validate, verify, retain and retrieve electronic QA records to meet the guidelines in NQA-1 and NIRMA TG-11 and TG-15. The inspectors questioned UNE's transition plan with retiring the old electronic UNE TC RMS while the new electronic UNE SharePoint RMS is being tested and is not fully implemented. UNE provided the inspectors with CR-2012-098, related to records reconciliation from TC RMS to SharePoint RMS and the UNE Audit Response Plan, IA-2011-03, which describes how UNE will screen and appropriately index records being transitioned from the TC RMS to the SharePoint RMS. At the time of the inspection, CR-2011-151, CR-2012-057, and CR-2012-098 were still open with a plan to fully implement the use of SharePoint RMS by January 2013.

The inspectors found that as part of UNE's corrective action plan of IA-2011-03 for indexing and categorizing QA records, UNE retired TC RMS electronic files into a legacy folder and uploaded them into a new SharePoint RMS folder for final processing as QA records in SharePoint RMS. Until UNE fully implements its SharePoint RMS in January 2013, UNE is not performing the final processing steps as described in UNE-RM-1.

The inspectors found that UNE-RM-1 procedure did not accurately describe the interim process controls in place that UNE is currently employing during this transition phase. Specifically, UNE-RM-1 did not contain interim procedures to recover, identify, index, authenticate, validate, verify, retain and retrieve records from the old electronic TC RMS and the new electronic SharePoint RMS. The inspectors identified the failure to prescribe the interim QA records program by appropriate instructions, procedures, or drawings as required by Criterion V, "Instructions, Procedures, and Drawings," of Appendix B to 10 CFR Part 50, as Violation 05200016/2012-201-01.

UNE maintains hard copies of QA records in seven fire-rated cabinets in the UNE office. The inspectors sampled hard copies of UNE QA records stored in these fire-rated that had also been uploaded into SharePoint RMS. The inspectors verified that the fire-rated cabinets met the 2-hour fire-rating storage requirements. However, the inspectors identified that UNE does not have a procedure for maintaining hard copies of QA records. UNE Procedures RM-AN-101, "Records Management," Revisions 3 and 6, and RM-AN-102, "Control of Documentation Distribution," Revision 1, did have procedure steps for maintaining hard copies of QA records, but these procedures were cancelled when subsequent documents were implemented. In addition, UNE-RM-1 did not contain procedures for maintaining hard copies of QA records. The inspectors identified this as another example of Violation 05200016/2012-201-01.

c. Conclusions

The inspectors concluded that with the exception of Violation 05200016/2012-201-01 for failure to prescribe the QA records program by instructions, procedures, or drawings, the implementation of the UNE QA records program was consistent with the regulatory requirements in Criterion XVII, of Appendix B to 10 CFR Part 50 and the provisions of the UNE quality assurance program description (QAPD) and associated industry guidelines.

2. Corrective Actions

a. Inspection Scope

The inspectors reviewed the implementation of the UNE process for corrective actions. Specifically, the inspectors reviewed the policies and procedures governing the implementation of the UNE process to verify compliance with Criterion XVI, "Corrective Actions," of Appendix B to 10 CFR Part 50. In addition, the inspectors reviewed a sample of CRs and discussed the program with UNE personnel responsible for the implementation of the corrective action program. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

b.1 Policies and Procedures

The inspectors verified that UNE had policies and procedures in place to ensure that conditions adverse to quality (CAQ), such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. The inspectors also verified that in the case of significant conditions adverse to quality (SCAQ), UNE's policies and procedures include measures

to ensure that the cause of the condition is properly identified, the corrective action taken to preclude its recurrence is documented, and that the SQAC and its corrective actions are reported to appropriate levels of management. The inspectors noted that corrective action controls extend to subcontractors and the corrective action procedures provide a link to the 10 CFR Part 21 procedures.

Section 16 of the UNE QAPD, "Corrective Action," defines the process for identifying and correcting conditions adverse to quality. The corrective action program is implemented by a set of lower-tiered procedures that address the following: the corrective action program process, the management review committee (MRC), corrective action program trending and analysis, common cause analysis (CCA), apparent cause evaluations (ACE), and root cause analysis (RCA).

b.2 Implementation of the Corrective Action Program

The inspectors reviewed a sample of 65 CRs and associated corrective actions (CAs), ACEs, RCAs and CCAs. The inspectors also reviewed a sample of MRC meeting summaries, adverse trend analyses and discussed the program with UNE personnel responsible for the implementation of the corrective action program.

The inspectors noted that procedure UNE-CA-1-101, "Corrective Action Program (CAP) Procedure," Revision 0, dated May 15, 2012 includes requirements to assign an achievable and timely due date for each corrective action and to perform the assigned corrective action prior to the assigned due date and describes the process for requesting and approving timeline extensions.

Contrary to the above, the inspectors identified six CRs that had ten associated corrective actions that exceeded their due dates and had not received approval to extend the timelines for closure:

- CA 1047 for CR-2012-013
- CA 1048 for CR-2012-013
- CA 1051 for CR-2012-015
- CA1052 for CR-2012-015
- CA 1077 for CR 2010-000103
- CA 1165 for CR-2011-000179
- CA1028 for CR 2012-002
- CA 1166 for CR-2012-061
- CA 1167 for CR-2012-061
- CA 1168 for CR-2012-061

These corrective actions were open for a period of one month to one year after the established due dates. The inspectors identified this issue as Violation 052000016/2012-201-02 for failure to promptly correct several CRs. UNE took immediate corrective action and initiated CR-2012-109 to address this issue.

Furthermore, UNE-CA-1-101 requires the CR owner to review completed CAs for adequacy in addressing the identified condition and to notify the responsible individual, and CAP manager of any CAs that are deemed inadequate or closed inappropriately.

Those CAs that were deemed inadequately or inappropriately closed shall be reopened and resolved.

During the 2011 internal audit, UNE identified 11 audit findings, including one audit finding related to ineffective corrective action program implementation. UNE initiated CR-2011-000151 and performed a RCA to address the audit findings. The CR was classified as a Level 1 CR, which are opened to address SCAQs including serious breakdowns in programmatic controls. The audit finding in the area of ineffective CAP implementation was based on 11 CRs identifying adverse trends in the corrective action program and ineffective or inappropriate closure of CRs. The RCA addressed the repetitive trend in the ineffective or improper closure of CRs and CAs and recommended that the UNE staff be retrained on the corrective action process, which was completed. The inspectors noted additional CRs related to the ineffective or inappropriate closure of CRs that were opened after the RCA was performed. CR-2012-007 was opened June 20, 2012 based on the 2012 internal audit that continued to see the premature and improper closure corrective actions. CR-2012-042 was opened on July 18, 2012 for inadequate closure of an approximately 20 additional CAs and CRs. These two CRs identified multiple CRs and CAs that were closed without the corrective actions being completed or without sufficient documentary evidence to support the closure of the CRs and CAs. Based on the additional CRs, the inspectors observed that the corrective actions identified in the RCA and implemented by UNE staff did not prevent the recurrence of the condition. UNE took immediate corrective action and opened CR-2012-110 to address this issue.

c. Conclusions

Based on the limited sample of corrective action requests reviewed, the inspectors concluded that the implementation of the UNE program for corrective actions was not consistent with the regulatory requirements in Criterion XVI of Appendix B to 10 CFR Part 50. The inspectors issued Violation 05200016/2012-201-02 for failure to promptly correct conditions adverse to quality and for failure to correct repetitive conditions adverse to quality.

3. 10 CFR Part 21 Program

a. Inspection Scope

The inspectors reviewed the policies and implementing procedures that govern the UNE program under 10 CFR Part 21 to verify its compliance with the NRC's regulatory requirements. The inspectors reviewed the UNE procedures that govern corrective action to verify an adequate link to the 10 CFR Part 21 process, and examined UNE's implementation of posting requirements in accordance with 10 CFR 21.6, "Posting Requirements." The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

The inspectors verified that UNE Procedure UNE-RA-1-101, "Implementation of 10 CFR Part 21 and 10 CFR Part 50.55(e)," Revision 0 met the requirements of 10 CFR 21.21 for adopting procedures to evaluate deviations and failures to comply to identify defects

and failures to comply associated with substantial safety hazard. At the time of the inspection, UNE had not performed any 10 CFR Part 21 evaluations. The inspectors verified that the UNE corrective action program provided a link to the 10 CFR Part 21 process and verified that for a sample of CRs, UNE had not missed any deviations that should have been evaluated for 10 CFR Part 21 reportability.

The inspectors verified that UNE had posted notices that included the text of Section 206 of the Atomic Energy, and a notice that described the regulations and implementing procedures, including the name of the individual to whom reports may be made and where reports may be examined.

For a sample of six safety-related purchase orders (POs), the inspectors verified that UNE had implemented a program consistent with the requirements described in 10 CFR 21.31, which specify the applicability of 10 CFR Part 21 in POs for safety-related services. The inspectors verified that UNE imposed the requirements of 10 CFR Part 21 on qualified suppliers that have programs that meet the requirements of Appendix B to 10 CFR Part 50.

c. Conclusions

The inspectors found that UNE appropriately translated the requirements in 10 CFR Part 21 into implementing procedures and, for those activities reviewed by the inspectors, implemented them as required by UNE procedures. No findings of significance were identified.

4. Organization and Quality Assurance Program

a. Inspection Scope

The inspectors reviewed UNE's policies and procedures to verify that UNE described and implemented its organization in a manner consistent with the regulatory requirements in Criterion I, "Organization," of Appendix B to 10 CFR Part 50. In addition, the inspectors discussed the organization with UNE management and staff. The inspectors reviewed UNE's policies and procedures that govern UNE's QA program to verify that it was implementing a QA program, including training activities, in a manner consistent with regulatory requirements and industry standards. The inspectors also reviewed the program controls and the personnel training and qualification process to verify conformance with the requirements in Criterion II, "Quality Assurance Program," of Appendix B to 10 CFR Part 50. In addition, the inspectors discussed the QA program controls and personnel training and qualification process with UNE management and technical staff. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

UNE recently updated organizational changes related to the QAPD to reflect Constellation Energy's exit from the partnership for ownership of the Calvert Cliffs Nuclear Power Plant Unit 3 (CCNPP3). The UNE QAPD includes UNE and its subsidiaries.

The inspectors reviewed the UNE functional area managers (FAMs) within the QAPD organization description and verified that they have adequate QA controls for review and approval of QA procedures and records within their functional area of responsibility, proper delegation of work, review of nonconforming items, and interface controls between the FAMs to meet the requirements in Appendix B to 10 CFR Part 50.

The inspectors reviewed qualification and training records for three UNE quality assurance (QA) lead auditors and one auditor in training. The inspectors also verified that training records for recertification training were in compliance with UNE procedures.

The inspectors verified that the training records for three QA lead auditor and one QA auditor in training, one UNE administrative staff member and the procurement functional area manager met the requirements of the applicable UNE procedures. The inspectors found that the training records documented that each UNE employee was adequately trained to perform QA audit functions or procurement functions in accordance with the UNE QAPD and UNE QA audit and procurement procedures.

c. Conclusions

The inspectors concluded that UNE's organization conformed to the requirements of Criterion I of Appendix B to 10 CFR Part 50 and that UNE was effectively implementing the QA policies and procedures for the organization's scope of work. The inspectors also found that UNE's QA program requirements conformed to the requirements in Criterion II of Appendix B to 10 CFR Part 50 and that UNE was effectively implementing the policy and procedures of its the QA program. No findings of significance were identified.

5. Oversight of Contracted Activities

a. Inspection Scope

The inspectors reviewed the UNE policies and procedures for procurement document control and control of purchased material, equipment, and services to verify compliance with Criterion IV, "Procurement Document Control," and Criterion VII, "Control of Purchased Material, Equipment, and Services," of Appendix B to 10 CFR Part 50. In addition, the inspectors reviewed a sample of POs, the approved vendors list (AVL), external audit reports, and the supplier evaluations to evaluate compliance with program requirements and adequate implementation of those requirements. The inspectors also reviewed the qualifications of auditors and corrective actions that address deficiencies identified by the audit findings for adequacy and timeliness. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

b.1 Procedural Controls for the Release of Procurement Documents

Section 4, of the UNE QAPD, "Procurement Document Control," establishes the measures to ensure that purchased items and services are subject to the appropriate technical, quality, regulatory, administrative and reporting requirements. The inspectors verified that UNE established procedures for the control and release of procurement

documents and subsequent changes. UNE procedure UNE-SC-176, "Procurement of Contracted Materials, Equipment and Services," in conjunction with desktop tools, UNE-SC-176-1003, "Desktop Tool for Purchase Order Processing," and UNE-SC-176-1003, "Desktop Tool for Purchasing Requisitions and Goods Receipt," establish the measures for the control of documents for the procurement of nuclear safety-related items, materials, and services and the requirements to ensure that purchased material, equipment, and services conform to procurement documentation. The inspectors verified that the documents that control the procurement process provide sufficient guidance to ensure that UNE imposes the necessary technical, quality, regulatory, administrative and reporting requirements on its vendors.

b.2 Implementation of UNE POs

The inspectors reviewed a sample of six POs related to the combined license application (COLA) for CCNPP3. The inspectors verified that the POs specified quality requirements, including technical, administrative, regulatory, and reporting requirements, and that the POs specified, where appropriate, that the supplier uses a documented QA program that is implemented and meets the applicable regulatory requirements. The six POs reviewed included the following: task definitions and responsibilities; imposition of appropriate quality, technical, and regulatory requirements; and identification of applicable codes and standards. The inspectors also confirmed that the POs reviewed included clauses invoking the provisions of 10 CFR Part 21, and Appendix B to 10 CFR Part 50.

For the purchase orders reviewed, the inspectors verified that UNE appropriately implemented its procurement process in accordance with its QA program, procedures, and applicable regulations.

b.3 Maintenance of the Approved Vendors List

Section 7, of the UNE QAPD, "Control of Purchased Material, Equipment, and Services," is the policy that establishes the measures to control the procurement of items and services. The policy also discusses the basis by which suppliers of safety-related items and services are evaluated to assure that only qualified suppliers are used. UNE procedure QA-AN-201, "Supplier Audit and Qualification Program," Revision 2, implemented on January 12, 2009, defines the controls for the establishment, maintenance, distribution, and update of AVL. QA-AN-201 states that the management position responsible for quality and performance improvement has the responsibility for preparing, approving, and maintaining the AVL.

The inspectors verified that triennial audits are performed for vendors, in accordance with UNE procedures, to remain on the AVL and annual supplier evaluations are performed for vendors when there is no receipt inspection or operating experience with which to analyze the vendor for a period of 12 months. In addition, the inspectors verified that audit findings receive followup and closeout including monitoring of effectiveness of corrective actions during future audits or surveillances. The inspectors also verified that findings from vendor audits or surveillances that impact parts or services are also entered into the UNE corrective action program. The inspectors confirmed that the suppliers performing work for UNE were appropriately listed on the AVL, and that the scope of supply was documented and consistent for the activities contracted.

The inspectors verified that the AVL was kept up to date and that any revisions to the list were implemented in accordance with the applicable procedure and policy.

b.4 External Audits

QA-AN-201 defines the controls for performing supplier audits. UNE-QA-2-204, "Supplier Surveillance," Revision 0, dated May 1, 2012 defines the controls for performing supplier surveillances. For a sample of supplier audits and surveillances, the inspectors verified that adequate controls had been established and implemented for the oversight of contracted activities. The sample of audits and surveillances included the following suppliers: Black & Veach; Sargent & Lundy; EDF Ceidre; and Paul C. Rizzo Associates, Inc. The inspectors verified that the audit plans identified the audit scope, focus, and that an applicable checklist had been prepared and approved before the initiation of the audit activity. In addition, the inspectors verified the training records for lead auditors and auditors who performed the external audits. The inspectors confirmed that the audit reports contained a review of the relevant QA criteria in Appendix B to 10 CFR Part 50 for the activities performed by the individual suppliers.

b.5 Acceptance of Procured Design Work and Combined License Application Development

UNE does not perform any in-house design activities and has delegated design control to its contractors. UNE provides oversight of its contractors and performs an owner's acceptance review to verify that detailed design work and design activities that support COL development performed by its contractors meet the technical and quality requirements in the purchase orders. The inspectors verified that UNE had policies and procedures in place to govern the owner's acceptance review process. UNE-EG-3-201, "Design Document Owner Acceptance," Revision 0, dated June 7, 2012, provides instruction for the review and acceptance of design documents developed by UNE vendors for the U.S. Evolutionary Power Reactor. The procedure contains detailed guidance and a checklist on what to look for in the design document. For a sample of two owner's acceptance reviews for the vibration monitoring system and the circulating water system, the inspectors verified that UNE accepted design services in accordance with Criterion 7 and supplement 7S-1 of NQA-1-1994 and that UNE documented that it had performed a review to verify that the design outputs met the requirements of the purchase orders.

c. Conclusions

The inspectors concluded that the implementation of the UNE procurement document control and control of purchased material, equipment, and services programs was consistent with the regulatory requirements in Criterion IV and Criterion VII of Appendix B to 10 CFR Part 50 and the provisions in the UNE QAPD and associated implementing procedures. No findings of significance were identified.

6. Audits

a. Inspection Scope

The inspectors reviewed the implementation of the UNE audit process in support of the CCNPP3 COLA. Specifically, the inspectors reviewed the policies and procedures that govern the implementation of UNE's audit process to verify compliance with

Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50. The attachment to this inspection report lists the documents reviewed by the inspectors.

b. Observations and Findings

Section 18, of UNE QAPD, "Audits," provides the policy guidance for the schedule, conduct, reporting of audits. UNE-QA-2-203 provides the guidance for preparing audit plans, performing audits, reporting conditions and findings, closing out audit findings, and documenting the audit. UNE-QA-2-205 provides the guidance for preparing, performing, documenting and followup of internal surveillances. In addition, UNE-QA-203 provides the guidance and requirements for QA audit personnel qualification.

For a sample of UNE internal audits and surveillances, the inspectors verified that, UNE was in compliance with applicable portions of Appendix B to 10 CFR Part 50 associated with CCNPP3 COLA. The inspectors verified that the audits and surveillances were adequate. The audits were performed for each functional area on an annual basis and verified the implementation of corrective actions.

c. Conclusions

The inspectors concluded that the implementation of the UNE internal audit program was consistent with the regulatory requirements in Criterion XVIII of Appendix B to 10 CFR Part 50 and the provisions of the UNE QAPD and associated implementing procedures. No findings of significance were identified.

7. Entrance and Exit Meetings

On July 30, 2012, the inspectors discussed the scope of the inspection with Mr. Gibson, UNE President, CEO, and CNO and with the UNE management and staff. On August 2, 2012, the inspectors presented the inspection results and observations during an exit meeting with Mr. Gibson and other UNE staff. The attachment to this report lists the entrance and exit meeting attendees and those individuals interviewed by the inspectors.

ATTACHMENT

1. ENTRANCE/EXIT MEETING ATTENDEES

<u>Name</u>	<u>Title</u>	<u>Affiliation</u>	<u>Entrance</u>	<u>Exit</u>	<u>Interviewed</u>
Samantha Crane	Inspection Team Lead	NRC/NRO	X	X	
Frank Talbot	Inspector	NRC/NRO	X	X	
Jonathan Ortega	Inspector	NRC/NRO	X	X	
Andrea Keim	Inspector in Training	NRC/NRO	X	X	
Greg Gibson	President, CEO, and CNO	UNE	X	X	
Mark Finley	Senior Vice President of Regulatory Affairs and Engineering	UNE	X	X	X
Kent Miller	Finance Vice President, Deputy Chief Financial Officer, and Controller	UNE	X	X	
Charles Marcinkiewicz	Manager, Quality Assurance	UNE		X	X
Eric Gwin	Director, DOE IE P/E Interface	UNE		X	X
John Tynan	Director, Projects	UNE	X	X	X
Al Pitts	Acting Director, Quality & Performance Improvement	UNE	X	X	X
David Sullivan	Director, Project Management	UNE	X	X	
Jennifer Solich	CAP Manager	UNE		X	X
Sibastien Thomas	Director, EDF Liason	UNE		X	
Cindy Danes	Sr. Analyst	UNE		X	
Laura Eifler	Director, Government and Public Relations	UNE		X	
David J. Murphy	Director, Procurement	UNE	X	X	X
Martha Christinziano	Director, Support Services	UNE		X	X
Debbie Hendell	Chief Counsel	UNE	X		

2. INSPECTION PROCEDURES USED

Inspection Procedure (IP) 35017, "Quality Assurance Implementation Inspection," dated July 29, 2008

IP 36100, "Inspection of 10 CFR Parts 21 and Programs for Reporting Defects and Noncompliance," dated February 13, 2012

3. LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

<u>Item Number</u>	<u>Status</u>	<u>Type</u>	<u>Description</u>
05200016/2012-201-01	Open	NOV	Criterion V
05200016/2012-201-02	Open	NOV	Criterion XVI

4. DOCUMENTS REVIEWED

ASME NQA-1, 1994 Edition, "Quality Assurance Program Requirements for Nuclear Facility Applications."

NIRMA TG 11, 1998 Edition, "Authentication of Records and Media."

NIRMA TG 15, 1998 Edition, "Management of Electronic Records."

NIRMA TG 16, 1998 Edition, "Software Configuration Management and Quality Assurance."

NIRMA TG 21, 1998 Edition, "Electronic Records Protection and Restoration."

Topical Report No. UN-TR-06-001-A, "Quality Assurance Program Description – UniStar Nuclear Energy QAPD," Rev 2, dated November 30, 2010

Topical Report No. UN-TR-06-001-A, "Quality Assurance Program Description – UniStar Nuclear Energy QAPD," Revision 3, dated July 26, 2012

UniStar Nuclear Energy (UniStar, UNE) Policies and Procedures:

UNE-QA-1, "Quality Assurance Policy," Revision 0, January 10, 2012

UNE-QA-1-600, "Control of Quality Assurance Program Description," Procedure Owner Group: "Quality and Performance Improvement," Revision 0, May 1, 2012

UNE-QA-1-502, "Quality Assurance Qualification, Procedure Owner Group: Quality and Performance Improvement," Revision 0, May 1, 2012

UNE-QA-1-501, "Quality Assurance Indoctrination, Procedure Owner Group: Quality and Performance Improvement," Revision 0, May 1, 2012

UNE-QA-1-301, "Delegation of Management Authority, Procedure Owner Group: Quality and Performance Improvement," Revision 0, May 1, 2012

UNE-TQ-1-201, "Functional Area Training and Qualification", Revision 0, June 1, 2012

UNE-QA-2, "Quality Assurance Oversight Program, Procedure Owner Group: Quality and Performance Improvement," Revision 0, May 1, 2012

UNE-QA-2-205, "Internal Surveillance Procedure," Revision 0, May 1, 2012

UNE-QA-2-204, "Supplier Surveillance," Revision 0, May 1, 2012

UNE-QA-2-203, "Internal Audit Procedure," Revision 0, May 1, 2012

UNE-QA-207, "Quality Assurance Program Annual Assessment," Revision 0, November 9, 2011

UNE-QA-202, "Audit Personnel Qualification and Certification, Procedure Owner Group: Quality and Performance Improvement," Revision 0, February 6, 2012

UNE-QA-102, "Quality & Performance Improvement (Q&PI) Review of Quality Affected Documents," Procedure Owner Group: "Quality and Performance Improvement," Revision 0, January 3, 2012

UNE-QA-10, "Quality Assurance-Design and Construction," Procedure Owner Group: "Quality and Performance Improvement," Revision 0, February 6, 2012

QA-AN-201, "Supplier Audit and Qualification Program," Revision 2,

UNE-QA-201, "Supplier Audit and Qualification Program," Revision 0, March 26, 2012

UNE-PM-01, "Project Management Policy, Revision 0, July 1, 2011

UNE-PI-1-101, "Self Assessments," Revision 0, May 01, 2012

UNE-PI-0, "Self-Assessment & Bench Marking Program Policy," Revision 0, May 21, 2012

LS-AN-990, "COLA Changes Under DC/COL-ISG-011," Revision 1, May17, 2010
 LS-AN-134, "Request for Information Process," Revision 2, March 31, 2010
 LS-AN-132-102, "Preparation of COLA Revision," Revision 0, August 10, 2009
 LS-AN-132-1003, "Preparation of Disk for NRC Electronic Submittal," Revision 0, August 11, 2009
 LS-AN-131-1001, "UNISTAR RAI response/COLA Input Expectations," Revision 3, July 23, 2010
 LS-AN-131, "UNISTAR RAI/SER-OI Process," Revision 5, June 9, 2009
 LS-AN-121, "Receipt of Incoming Correspondence," Revision 2, March 31, 2010
 LS-AN-1092, "Processing Client Prepared COLA Input," Revision 0, October 19, 2007
 LS-AN-103, "Regulatory Review of EPR Design and Program Changes," Revision 0, December 1, 2008
 UNE-IT-1-992, "Software Configuration Management and Quality Assurance," Revision 0, May 5, 2012
 UNE-IT-1-991, "Software Configuration Management and Quality Assurance for QA/Regulated Documents and Records," Revision 0, May 31, 2012
 UNE-IT-1, "Information Technology for Electronic Records Management Program," Revision 0, May 31, 2012
 IT-AN-992, "Disaster Prevention and Recovery," Revision 0, June 9, 2009
 IT-AN-9901, "QA and Regulatory Electronic Records and Documents Archive/Restore," Revision 0, June 9, 2009
 IT-AN-1, "Information Technology Policy," Revision 1, December 1, 2010
 EP-AN-1, "Emergency Planning Policy," Revision 0, November 3, 2010
 UNE-EG-3-210, "Vendor Non-Conformance Review," Revision 0, June 5, 2012
 UNE-EG-3-201, "Design Document Owner Acceptance," Revision 0, June 7, 2012
 UNE-EG-3, "Engineering oversight Program," Revision 0, June 7, 2012
 UNE-TQ-1-501, "Engineering Training and Qualification," Revision 0, May 31, 2012
 UNE-EG-2-101, "UNISTAR Configuration Management and Implementation," Revision 0, May 31, 2012
 UNE-EG-2, "UniStar Configuration Management and Program," Revision 0, May 31, 2012
 UNE-EG-1-102, "Engineering Technical Evaluation Process," Revision 0, May 31, 2012
 UNE-EG-1, "Design Control Program," Revision 0, May 31, 2012
 UNE-EG-0, "Engineering Policy," Revision 0, June 4, 2012
 EG-AN-991, "Commercial Grade Dedication," Revision 0, May 29, 2009
 UNE-IT-1-992, "Software Configuration Management and Quality Assurance," Revision 0, May 31, 2012
 UNE-IT-1-991, "Software Configuration Management and Quality Assurance for QA/Regulated Documents and Records," Revision 0, May 31, 2012
 UNE-IT-1, "Information Technology for Electronic Records Management Program," Revision 0, May 31, 2012
 UNE-TQ-1-501, "Engineering Training and Qualifications," Revision 0, May 31, 2012
 UNE-EC-1-101, "Employee Concerns Process," Revision 0, May 21, 2012
 UNE-EC-1, "Employee Concerns Program," Revision 0, May 21, 2012
 EC-AN-1, "Safety Conscious Work Environment," Revision 0, December 21, 2007
 CA-AN-101-1010, "Electronic Condition Reports," Revision 2, March 14, 2011
 UNE-CA-1-106, "Root Cause Analysis," Revision 0, May 2, 2012
 UNE-CA-1-105, "Apparent Cause Evaluation," Revision 0, May 1, 2012
 UNE-CA-1-104, "Common Cause Analysis," Revision 0, May 1, 2012
 UNE-CA-1-103, "Corrective Action Program Trending and Analysis," Revision 0, May 1, 2012
 UNE-CA-1-102, "Management Review Committee," Revision 0, May 15, 2012
 UNE-CA-1-101, "Corrective Action Program (CAP) Procedure," Revision 0, May 15, 2012

UNE-CA-1, "Corrective Action Program Description," Revision 0, May 1, 2012
 UNE-CA-0, "Corrective Action Program Policy," Revision 0, May 21, 2012
 UNE-AD-1-301, "Program Process Control," Revision 0, April 25, 2012
 UNE-AD-1-104, "Document Preparation Tracking," Revision 0, April 27, 2012
 UNE-AD-1-201, "Control and Format of Policies," Revision 0, April 25, 2012
 UNE-AD-1-103, "Procedure Use and Adherence," Revision 0, April 25, 2012
 UNE-AD-1, "Administrative Program," Revision 1, May 30, 2012
 UNE-AD-0, "Document Hierarchy and Administration Policy," Revision 0, April 25, 2012
 UNE-TQ-1, "UniStar Training and Qualification Program," Revision 0, May 23, 2012
 UNE-TQ-1-101, "General Employee Training," Revision 0, May 30, 2012
 UNE-TQ-1-502, "Orientation of New Employees/Contractors," Revision 0, May 31, 2012
 UNE-TQ-1-506, "Procurement Training and Qualification," Revision 0, May 31, 2012
 UNE-RM-0, "Records Management Policy," Revision 0, May 23, 2012
 UNE-RM-1, "Records Management Program," Revision 0, May 31, 2012
 UNE-RA-1-132, "Revision of Licensing Basis Documentation Before Operating License Issuance," Revision 0, May 31, 2012
 UNE-RM-1-101, "Records Management," Revision 0, June 1, 2012
 UNE-RM-1-201, "Document Control," Revision 0, June 26, 2012
 UNE-SC-1-100, "Procurement of Contracted Materials, Equipment and Services," Revision 0, May 31, 2012
 UNE-AD-1-101, "Procedure Process Control," Revision 1, June 26, 2012
 UNE-RA-0, "Regulatory Affairs Policy," June 4, 2012
 UNE-RA-1-123, "Commitment Management," Revision 0, May 31, 2012
 UNE-TA-1-503, "Records Management (RM)/Document Control (DC) Training and Qualification," Revision 0, June 1, 2012
 UNE-RA-1, "Regulatory Affairs Program," Revision 0, May 31, 2012
 UNE-RA-1-133, "Acceptance Review of EPR Design Certification Changes," Revision 0, May 31, 2012
 UNE-RA-1-201, "Implementation of 10 CFR Part 21 and 10 CFR 50.55(e)," Revision 0, May 31, 2012
 UNE-SC-176-1003, "Desktop Tool for Purchase Order Processing," Revision 0, December 12, 2011
 UNE-SC-176-1001, "Desktop Tool for Purchasing Requisitions and Goods Receipt," Revision 0, October 25, 2011
 TQ-AC-107, "Evaluation Phase Activities," Revision 0, October 21, 2010
 TQ-AC-106, "Implementation Phase Activities," Revision 0, October 21, 2010
 TQ-AC-105, "Development Phase Activities," Revision 0, October 21, 2010
 TQ-AC-104, "Design Phase Activities," Revision 0, October 21, 2010
 TQ-AC-103, "Training Analysis Activities," Revision 0, October 21, 2010
 TQ-AC-102, "Training Administration," Revision 0, October 21, 2010
 TQ-AC-101, "Conduct of Training," Revision 0, October 21, 2010
 TQ-AC-10, "Nuclear Training Program," Revision 0, October 21, 2010
 TQ-AN-1, "Training and Qualification Policy," Revision 0, October 28, 2010
 SY-AN-999, "Control of Safeguards Information," Revision 0, November 2, 2010
 SY-AN-1, "Security Policy," Revision 0, November 3, 2010
 RM-AN-102-1001, "Distribution of Controlled Documents," Revision 0, November 5, 2010
 RM-AN-111, "Client Incoming Document Transfer Program," Revision 0, March 30, 2007
 RM-AN-110, "Transfer of Records to Client," Revision 0, March 30, 2007
 RM-AN-103, "Electronic Documents and Records Program," Revision 2
 SC-AN-1, "Supply Chain," Revision 0, November 2, 2010
 RM-AN-101, "Records Management," Revision 3 and 6

RM-AN-102, "Control of Documentation Distribution," Revision 1

Internal Audits and Surveillances:

Internal Audit (IA)-2011-003, "Quality and Performance Improvement," November 4, 2011
IA-2011-002, "Supply Chain Functional Area,"
IA-2011-006, "Engineering Functional Area," July 27, 2012
IA-2012-001, "Regulatory Affairs Functional Area,"
IA-2012-002, "Supply Chain Functional Area,"
Internal Surveillance (IS)-2012-02, Review of the UNE Records of Quality Assurance
Indoctrination and SCWE Training," July 27, 2012

External Audits:

Black & Veach Audit 2011-001, dated May 11, 2011
Sargent & Lundy Audit 2009-001, dated September 27, 2009
EDF Ceidre 2011-001, dated January 12, 2012
NUPIC audit participation Audit Report VA12-002, Paul C. Rizzo Associates, Inc.

Other Records Management Documents:

UNE White Paper, "UniStar Records Management System Solution," February 17, 2012.
UNE Records Management Process (RMP), dated February 19, 2012
Position White Paper, "UniStar RMS Quality Dedication Analysis," dated March 23, 2012
UNE Purchase Order US15-US5-4300013719, NTT America, Incorporated, PO for NTT
America Data Center Services, NTT America, Enterprise Solutions Business Unit, Data Backup
Service Description
Global Security Services, "Security Assurance Reference (SAR) Guide"
UNE-EG-AN-991, Revision 0, Attachment 1, "Request for Commercial Grade Dedication
Services, Title: Records Management System (RMS) Utilizing Microsoft Office Share Point
Services (MOSS)," dated April 9, 2012
UNE Audit Response Plan, IA-2011-03, "Records Reconciliation Plan"

Condition Report (CR) CR-2010-000084

CR 2009-000083
CR-2010-000067
CR-2010-000089
CR-2010-000090
CR-2010-000094
CR-2010-000095
CR-2010-000097
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CR-2010-000108
CR-2010-000117
CR-2010-000120
CR 2010-000126
CR-2010-000128
CR-2010-000146
CR-2010-000152
CR-2010-000163
CR-2010-000164
CR-2010-000165
CR-2011-000001
CR-2011-000006

CR-2011-000011
CR-2011-000039
CR-2011-000044
CR-2011-000048
CR-2011-000049
CR-2011-000056
CR-2011-000061
CR-2011-000066
CR-2011-000073
CR-2011-000095
CR-2011-000098
CR-2011-000104
CR-2011-000105
CR-2011-000133
CR-2011-000140
CR-2011-000151
CR-2011-000158
CR-2011-000174
CR-2011-000180
CR-2012-002
CR-2012-007
CR-2012-013
CR-2012-015
CR-2012-017
CR-2012-023
CR-2012-032
CR-2012-038
CR-2012-044
CR-2012-047
CR-2012-048
CR-2012-049
CR-2012-055
CR-2012-057
CR-2012-061
CR-2012-066
CR-2012-074
CR-2012-077
CR-2012-079
CR-2012-080
CR-2012-098
CR-2012-107
CR-2012-108
CR-2012-109
CR-2012-110

Corrective Action (CA) 1047 for CR-2012-013
CA 1048 for CR-2012-013
CA 1051 for CR-2012-015
CA1052 for CR-2012-015
CA 1077 for CR 2010-000103
CA 1165 for CR-2011-000179

CA 1166 for CR-2012-061
CA 1167 for CR-2012-061
CA 1168 for CR-2012-061

Documents Reviewed for Design Documents Owner Acceptance

UNE 00283 ARE, "US EPR Detailed Design Owner Review for US EPR System Design Document: Vibration Monitoring System," dated August 24, 2009
EPR00-115-3DR-KIR-00001-00A, "System Design Requirements Document: Vibration Monitoring System (VMS) (ECS:KIR)" Rev 0, dated October 14, 2008
UNE 00058 ARE, US EPR Detailed Design Owner Review for CWS PIS, dated October 6, 2008
Circulating Water System P&ID Comment Resolution, dated October 22, 2008
UNE 00066 ARE, US EPR Detailed Design Owner Review for CWS PIS, dated October 27, 2008
Circulating Water System Piping & Instrument Diagrams Circulating Water System SDRD (UNE 00066 ARE), dated November 21, 2008
UNE 00078 ARE, US EPR Detailed Design Owner Review for CWS PIS, dated December 1, 2008
Circulating Water P&ID, dated December 16, 2008

Purchase Orders (PO):

PO No. 300258, AREVA NP, CC3 NSSS Heavy Forgings
PO No. 300431, Washington Group, HDPE Piping Topical Report
PO No. 300517, Amsden Consulting Services, Internal Audit of UNE
PO No. 10004, EDF Development, Long lead Material Procurement Surveillance for US EPR
PO No. 4200006128, Bechtel Power Corp, Bechtel COLA for CC3
PO No. 4300011726, Paul C. Rizzo, UHS Intake Structure for CC3

Meeting Documentation:

MRC 1Q11 Meeting Agenda Rev 0
MRC 1Q11 Meeting Minutes 3-16-11
MRC 1Q11 Meeting PowerPoint (handout)