

CENG_{SM}

a joint venture of



November 21, 2013

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: **Calvert Cliffs Nuclear Power Plant**
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Calvert Cliffs Independent Spent Fuel Storage Installation
Docket No. 72-8
Nine Mile Point Nuclear Station
Unit Nos. 1 & 2; Docket Nos. 50-220 & 50-410
Nine Mile Point Independent Spent Fuel Storage Installation
General License
Docket No. 72-1036
R. E. Ginna Nuclear Power Plant
Docket No. 50-244
R. E. Ginna Independent Spent Fuel Storage Installation
General License
Docket No. 72-67

Change to Quality Assurance Topical Report, Revision 7

Constellation Energy Nuclear Group, LLC (CENG) is submitting the following change to Revision 7 of the CENG Quality Assurance Topical Report (QATR). This change is submitted for approval by the Nuclear Regulatory Commission (NRC) in accordance with 10 CFR 50.54(a)(4).

The change:

Change the following portions of Section B.4 (page 22):

In establishing controls for procurement, CENG commits to compliance with NQA-1, 1994, Basic Requirements 4 and 7, and Supplements 4S-1 and 7S-1, with the following exceptions:

1. For Supplement 4S-1, Section 2.3, which ~~states requires procurement documents to require a quality program that complies with NQA-1~~ "Procurement documents shall require that the Supplier have a documented quality assurance program that implements portions or all of the requirements of this Part (Part I)": ~~CENG may accept vendors having a documented quality assurance program that implements the applicable requirements of ASME NQA-1 1994, or another NRC endorsed standard that has shown to be equivalent to NQA-1 1994. Vendors~~ CENG vendors shall be required to have a documented quality assurance program that implements the applicable requirements of 10CFR50, Appendix B. *The vendor's documented quality assurance program must have been confirmed to meet the requirements of 10CFR50, Appendix B. In addition, CENG*

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vendors may comply with additional documented quality assurance program requirements that implement portions or all the applicable requirements of ASME NQA-1-1994.

Reason for the change:

Criterion IV of 10 CFR Part 50, Appendix B specifies: "to the extent necessary, procurement documents shall require contractors or subcontractors to provide a quality assurance program consistent with the pertinent provisions of this appendix." Discussions with NRC at a NQA-1 meeting confirmed that there is no regulatory requirement to impose QA Program requirements other than Appendix B on contractors or subcontractors. Not all vendors have QA Programs that implement NQA-1 or other standards. Some commit only to compliance with Appendix B. This change will minimize conflicts with vendor QA Programs without violating regulations.

Basis for the change:

Criterion IV of 10 CFR Part 50 Appendix B, Procurement Document Control, specifies "Measures shall be established to assure that applicable regulatory requirements, design bases, and other requirements necessary to assure adequate quality are suitably included or referenced in the documents for procurement of material, equipment, and services, whether purchased by the applicant or by its contractors or subcontractors. To the extent necessary, procurement documents shall require contractors or subcontractors to provide a quality assurance program consistent with the pertinent provisions of this appendix."

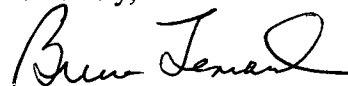
The proposed change will remain in compliance with Criterion IV by continuing to directly impose the requirements of Appendix B. The change will enhance compliance by clarifying the requirement for CENG to verify vendor compliance with Appendix B.

A markup of the QATR pages affected by this change is included as Attachment 1. Upon approval, please replace Pages 22 and 23 of the NRC copy of the QATR with the pages in Attachment 2.

There are no regulatory commitments in this correspondence.

Should you have questions regarding this matter, please contact me at (410) 470-3778

Sincerely,



Bruce P. Leonard
Manager-Fleet Quality & Performance
Assessment

BPL/EMT

- Attachments: (1) QATR Pages 22 and 23 of 47 with Requested Change
(2) QATR Replacement Pages 22 and 23 of 47

Document Control Desk

November 21, 2013

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cc: Project Manager, Calvert Cliffs, NRC
Project Manager, Nine Mile Point NRC
Project Manager, R.E. Ginna, NRC
Regional Administrator, NRC Region I

Resident Inspector, Calvert Cliffs
Resident Inspector, Ginna
Resident Inspector, Nine Mile Point
S. Gray, Maryland DNR

ATTACHMENT (1)

QATR PAGES 22 AND 23 OF 47 WITH REQUESTED CHANGE

depending upon the relative importance and complexity of the purchased item or service and the supplier's past performance.

The contents of procurement documents vary according to the item and/or service being purchased and its function in the plant. Procurement documents include the following, as applicable:

1. Material description and/or scope of work to be performed.
2. Technical requirements with reference to applicable drawings, specifications, codes and standards identified by title, document number, revision and date. Any required procedures, such as special process instructions, are identified in such a way as to indicate source and need.
3. Regulatory, administrative and reporting requirements. This includes 10 CFR 21 requirements, specifications, codes, standards, tests, inspections, and special processes. (The QA programmatic requirements of ASME NQA-1 or ANSI N45.2 may be used, where appropriate.)
4. A requirement for a documented QA program.
5. A requirement for the supplier to invoke applicable quality requirements on subtier suppliers.
6. Provisions for access to supplier and subtier suppliers' facilities and records for inspections, surveillances and audits.
7. Identification of documentation to be provided by the supplier.
8. Provisions for documentation and dispositioning of nonconformances.

Spare and replacement parts are procured in accordance with the following provisions to assure that their performance and quality are at least equivalent to those of the parts that will be replaced:

1. Specifications and codes referenced in procurement documents for spare or replacement items are the same or equivalent to those for the original items or to the reviewed and approved revisions;
2. Where quality requirements for the original items cannot be determined, requirements and controls are established by an engineering evaluation; and
3. Any additional or modified design criteria imposed after previous procurement of the item(s), are identified and incorporated.

Appropriate controls are imposed for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt, and quality evaluation of commercial grade items or services to ensure that they will perform satisfactorily in service.

In establishing controls for procurement, CENG commits to compliance with NQA-1, 1994, Basic Requirements 4 and 7, and Supplements 4S-1 and 7S-1, with the following exceptions:

1. For Supplement 4S-1, Section 2.3, which ~~states requires procurement documents to require a quality program that complies with NQA-1, "Procurement documents shall require that the Supplier have a documented quality assurance program that implements portions or all of the requirements of this Part (Part I)".~~ CENG may accept vendors having a documented quality assurance program that implements the applicable requirements of ASME NQA-1-1994, or another NRC endorsed standard that has shown to be equivalent to NQA-1-1994. Vendors CENG vendors shall be required to have a documented quality assurance program that implements the applicable requirements of 10CFR50, Appendix B. The vendor's documented quality assurance program must have been confirmed to meet the requirements of 10CFR50, Appendix B. In addition, CENG vendors may comply with additional documented quality assurance program requirements that implement portions or all of the applicable requirements of ASME NQA-1-1994.

2. For NQA-1-1994 Supplement 4S-1 and Supplement 7S-1, CENG will use the guidance contained in Generic Letters 91-05 and 89-02/EPRI NP-5652 to procure commercial grade items in lieu of these requirements.
3. For Supplement 7S-1, Section 8.1, documentary evidence that items conform to procurement requirements need not be available at the site prior to item installation, but will be available at the site prior to placing reliance on the item for its intended safety function.
4. Supplement 7S-1 Paragraph 8.2.4 states "...post-installation test requirements and acceptance documentation shall be mutually established by the Purchaser and Supplier." In exercising ultimate responsibility for its QA Program, CENG establishes post-installation test requirements, giving due consideration to supplier recommendations.
5. CENG may procure Commercial Grade calibration services from domestic (US) calibration laboratories accredited by the National Voluntary Laboratory Accreditation Program (NVLAP) or American Association for Laboratory Accreditation (A2LA) in lieu of a CENG or 3rd party commercial grade survey or in-process surveillances provided all of the following are met:
 - a. The accreditation is to ANSI/ISO/IEC 17025.
 - b. The accrediting body is either NVLAP or A2LA. Continued acceptability of the A2LA alternative is contingent on NVLAP recognition through the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA).
 - c. The published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties. (Procured services must be within the accredited scope of the NVLAP and/or A2LA certificates.)
 - d. The procurement documents impose additional technical and administrative requirements, as necessary, to satisfy CENG QA program technical requirements. (Procurement documents shall explicitly require that the calibration certificate/report include identification of the laboratory equipment/standards used.)
 - e. The procurement documents require reporting as-found calibration data when calibration items are found to be out-of-tolerance.
 - f. This alternative method is applicable to sub-suppliers of calibration service suppliers, provided the above conditions are met.

B.5 PROCUREMENT VERIFICATION

CENG establishes and implements measures to verify the quality of purchased items and services, whether purchased directly or through contractors, at intervals and to a depth consistent with the item's or service's importance to safety, complexity, quantity and the frequency of procurement. Verification actions include testing, as appropriate, during design, fabrication and construction activities associated with plant maintenance or modifications. Verifications occur at the appropriate phases of the procurement process, including, as necessary, verification of activities of suppliers below the first tier. When suppliers perform work under their own QA programs, those programs are reviewed for compliance with the applicable requirements of 10 CFR Part 50 Appendix B and the contract.

In establishing procurement verification controls, CENG commits to compliance with NQA-1, 1994, Basic Requirement 7 and Supplement 7S-1.

ATTACHMENT (2)

QATR REPLACEMENT PAGES 22 AND 23 OF 47

depending upon the relative importance and complexity of the purchased item or service and the supplier's past performance.

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