Industry Comments on draft Revision 1 to *Quality Assurance Program Description – Design Certification, Early Site Permit and New License Applicants,* [Docket ID NRC-2014-0204]

1. The titles for the areas of review should be consistent with the criterion from Appendix B to 10 CFR Part 50 that they reference.
    a. On pages 17.5-2 and 17.5-13: "C. Design Control and Verification" should be changed to be consistent with Criterion III "Design Control".
    b. On pages 17.5-2 and 17.5-26: "Q. Records" should be changed to be consistent with Criterion XVII "Quality Assurance Records".
2. On page 17.5-6, A.7.d: The NRC has introduced a new criterion that the management position responsible for the Quality Assurance Program (QAP), "Has no other duties or responsibilities unrelated to QA that would prevent his full attention to QA matter." This new criteria is overly restrictive and may preclude the individual from having any other oversight responsibility, even if another responsibility has no impact on their ability to fulfill their QA responsibilities. We agree that it is important that the individual not be precluded from performing their QA responsibilities, and we recommend the criteria should be phrased as follows, consistent with NQA-1 2008/2009: "Has sufficient authority and organizational freedom to implement the QA program, and is sufficiently independent from cost and schedule."
3. On page 17.5-6, A.8: The concept that all quality verification is performed by the QA organization or by organizations independent of the organization performing the task is not consistently applied in the Standard Review Plan Section 17.5 (SRP). There are several exceptions, for example design verification, identified in NQA-1 and in the NRC approved NEI 11-04A *Nuclear Generation Quality Assurance Program Description* where the qualifier can be in the same organization. This criterion should reflect that exceptions are permitted in some specific instances.
4. On page 17.5-7, A.11: The last sentence appears to be incomplete. Adding the words "compliant with the requirements of" between "QA program" and "10 CFR 50.34(f)(3)(iii)(F)" may convey the intended meaning.
5. On page 17.5.7, B.1: The sentence is long and confusing. It should be revised and split into two sentences to be clearer.
6. On page 17.5-11, B.13.b.(6).i: The last sentence is more appropriately worded as follows: "The Independent Review Committee also verifies that changes do not adversely affect safety, and <u>determines</u> if a technical specification change or NRC review is required." Underline indicates changes to the draft criteria.
7. On page 17.5-15, C.16: The new criterion related to the review of procedures by the QA organization is inconsistent with the role of the QA organization. The QA organization provides oversight of the design process but does not approve individual drawings. The criteria as proposed would require the QA organization to be involved in every design drawing, specification and subsequent change. Consistent with NQA-1, we recommend the criteria be revised as follows: "Procedures are established and described requiring that design drawings and specifications be reviewed by <u>individuals knowledgeable of QA requirements</u> to ensure that the documents are prepared, reviewed, and approved in accordance with company procedures and that the documents contain the necessary QA requirements such as inspection and test

requirements, acceptance requirements, and the extent of documenting inspection and test results." Underline indicates changes to the draft criteria.

8. On page 17.5-18, F.8: The draft SRP Revision 1 changes the criterion from "all" of the conditions needing to be met to "one" of the conditions needing to be met; however, the revised criterion is not clear. It may be clearer if the language is revised to match Section 6.1 of the NRC approved NEI 11-04A.
9. On page 17.5-27: Criteria defining "Lifetime" and "Nonpermanent" records were removed (from Revision 0, these are items Q.11 through Q.13 on pages 17.5-28 and 17.5-29). It is not clear whether the NRC's intention is that these terms would be defined by each licensee. We believe that providing a common definition of these terms in Section 17.5 would provide clarity, and we recommend that the definitions from Revision 0 be inserted between Q.12 and Q.13 on page 17.5-27.