

From: Tapp, Jeremy
Sent: Wednesday, February 07, 2018 10:47 AM
To: HAKER Wolfgang <W.Haker@daher.com>
Cc: ROTH Stephan <S.Roth@daher.com>
Subject: DAHER Part 71 QAP Biennial Change Report and Revised QAP Review

Hello Wolfgang

Thank you for your response. Because the Part 71 QAP document is not under a formal review and approval process, I will discuss one issue identified during the review of your revised QAP and associated biennial change report via email below.

In reviewing the changes made between Revision 0 and Revision 1, a potential issue was identified in the area of Internal Audits. In Revision 0 on page 19 it states "...that all organisation units involved in the QM system will be audited annually." My understanding is that this required annual audits of your Part 71 transportation program. In Revision 1 on page 15 it states "...that all processes and all organization units involved in the QM system will be audited once during the validity of a certificate (3 years)." My understanding is that this currently requires or allows an audit of your Part 71 transportation program once every 3 years.

If my understanding is correct, this is considered a reduction in effectiveness because your commitment to perform internal audits annually has been reduced to once every 3 years. And under 10 CFR Part 71.106(a), this change requires formal NRC review and approval with adequate justification on why the reduction in commitment still maintains safety and quality and continues to meet NRC's Part 71 subpart H requirements. The other option you have is to revise your program to the original annual frequency, which would be an allowed change per 71.106(b).

Please let me know if you have any questions or need clarification as I'd be happy to discuss further.

If you don't have any additional questions, please let me know what your plans are moving forward as soon as a decision is made.

Thank you,

Jeremy Tapp
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