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April 30, 2019
L-19-038

10 CFR 50.54(a)(4)

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:
Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License No. NPF-3
Request for Approval of Decommissioning Quality Assurance Program, Revision 0 for the Davis-Besse Nuclear Power Station

Pursuant to 10 CFR 50.54(a)(4), FirstEnergy Nuclear Operating Company (FENOC) is submitting a proposed Decommissioning Quality Assurance Program (DQAP) in preparation for the transition of the Davis-Besse Nuclear Power Station (DBNPS), Unit No. 1, to a permanently defueled condition.

By letter dated April 25, 2018 (Accession No. ML18115A007), FENOC provided formal notification to the U.S. Nuclear Regulatory Commission (NRC) that DBNPS will permanently cease power operation by May 31, 2020. Once DBNPS permanently ceases operations and submits the certifications required by 10 CFR 50.82(a)(1)(i) and (ii), pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license for DBNPS will no longer authorize operation of the reactor or placement or retention of fuel in the reactor vessel.

The proposed DQAP will be implemented at DBNPS after the required certifications pursuant to 10 CFR 50.82(a)(1) have been docketed. The DQAP is a new document based on the existing FENOC Fleet Quality Assurance Program Manual (QAPM) that is currently used at all operational FENOC nuclear sites. The DQAP reflects changes and simplifications based on a decommissioned status of the DBNPS. In some cases, changes have been identified as reductions in commitment. The changes that limit regulatory guidance and standards to those that are applicable to a facility undergoing decommissioning results in deletion of regulatory guides and standards previously committed to in the FENOC QAPM and are identified as a reduction in commitment. The DBNPS DQAP assures compliance with 10 CFR 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants; 10 CFR 71, Subpart H, Quality Assurance; and 10 CFR 72, Subpart G, Quality Assurance.

The proposed changes associated with the DQAP include:

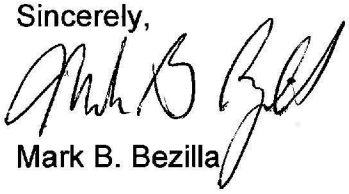
- Changes in applicability due to reclassification of systems, structures, and components.
- Implementation methodology details found in the FENOC Fleet QAPM that are not included in the DBNPS DQAP.
- Streamlining organizational functions to accommodate changing and consolidating responsibilities.
- Application of regulations applicable to a facility undergoing decommissioning.
- Extensive editorial changes that eliminate redundancy, provide clarity, and improve readability.

In accordance with 10 CFR 50.54(a)(4)(ii), Enclosure A provides a comparison of the changes between the DBNPS DQAP and the FENOC Fleet QAPM, including those changes determined to be a reduction in commitment from the previously approved FENOC Fleet QAPM. This provides a basis for concluding that the DBNPS DQAP will continue to meet the applicable regulatory requirements. Enclosure B provides the complete DQAP document. Once approved, the DQAP will become the basis for the DQAP at other FENOC plants undergoing decommissioning.

To support the current schedule that reflects DBNPS transitioning to a permanently shutdown and defueled facility, FENOC requests review and approval of the proposed DBNPS DQAP by May 1, 2020. FENOC is also requesting a 60-day implementation period following the effective date of the DQAP. FENOC requests that the approved DQAP become effective following submittal of the required 10 CFR 50.82(a)(1)(ii) certification that DBNPS has been permanently defueled.

There are no regulatory commitments contained in this submittal. If there are any questions, or if additional information is required, please contact Mr. Thomas A. Lentz, Manager, Nuclear Licensing & Regulatory Affairs, at (330) 315-6810.

Sincerely,



Mark B. Bezilla

Enclosures:

A. 10 CFR 50.54(a) Evaluation with Comparison of Davis-Besse Decommissioning Quality Assurance Program and FENOC Fleet Quality Assurance Program Manual
B. FENOC Decommissioning Quality Assurance Program for the Davis-Besse Nuclear Power Station, Revision 0

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager
Utility Radiological Safety Board

Enclosure A
L-19-038

10 CFR 50.54(a) Evaluation with Comparison of Davis-Besse Decommissioning Quality Assurance Program and FENOC Fleet Quality Assurance Program Manual
(28 pages, excluding this page)

10 CFR 50.54(a) EVALUATION

Instructions: Use this form as a template for the 10 CFR 50.54(a) Evaluation Report. Attach additional pages and supporting documentation as necessary. Refer to NOP-LP-2022, Attachment 1, for guidance for performing the evaluation.

Summary of Change(s): This is the initial issuance of the Davis-Besse Decommissioning Quality Assurance Program (DQAP) that is applicable to a site where operation has permanently ceased and all the fuel has been permanently removed from the reactor vessel. Changes made utilized input from:

- Request for Approval of Decommissioning Quality Assurance Program, Revision 0 for Oyster Creek Nuclear Generating Station dated November 30, 2017 (ML17334A798).
- Response to Request for Additional Information (RAI) Regarding Request for Approval of Decommissioning Quality Assurance Program, Revision 0 for Oyster Creek Nuclear Generating Station dated June 6, 2018 (ML18157A227).
- Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation - Review and Acceptance of Changes RE: Decommissioning Quality Assurance Program (EPID L-2017-LLQ-0003) dated June 27, 2018 (ML18165A136).
- Proposed Revision to the Entergy Vermont Yankee Quality Assurance Program Manual (VY QAPM) dated September 19, 2017 (ML17268A152).
- Entergy Vermont Yankee Quality Assurance Program Manual Vermont Yankee Nuclear Power Station and Independent Spent Fuel Storage Facility - Review and Acceptance of Changes (EPID L-2017-DP3-0002) dated May 1, 2018 (ML18099A166).

A detailed evaluation of the changes associated with moving from a FENOC Fleet Quality Assurance Program (QAPM) to a Davis-Besse Decommissioning Quality Assurance Program (DQAP) is contained in an attachment.

The DQAP reflects changes and simplifications based on site decommissioning status. The removal of commitment to Regulatory Guides and associated standards is considered a reduction in commitment to that stated in the previously approved QAPM. The proposed DQAP includes a change in focus on systems, structures, and components that are important to safety based on the decommission status, moving implementation methodology to procedures, and limiting regulatory guidance and quality standards to those that are applicable to a decommissioning facility. The Davis-Besse DQAP assures compliance with 10 CFR 50 Appendix B Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants, 10 CFR 72, Subpart G Quality Assurance, and 10 CFR 71 Packaging And Transportation of Radioactive Material, Subpart H Quality Assurance.

The proposed changes for development of the DQAP include:

- Changes in applicability due to reclassification of structures, systems, and components.
- Implementation methodology details found in the QAPM are not included in the DQAP.
- Streamlining organizational functions to accommodate changing and consolidating responsibilities.
- Applies regulations applicable to a decommissioning facility.

Proposed Change(s): Regulatory guides, industry standards, and exceptions to those standards that are only applicable to an operating facility will not be carried over to the DQAP. The remaining regulations and quality standard will be added to Appendix C in the DQAP. These are:

- 10 CFR 50, Appendix B
- 10 CFR 71 Subpart H

- 10 CFR 72 Subpart G
- NUREG/CR 6407

Additional regulatory guides, regulations, and industry standards are listed in the DQAP Appendix E Davis-Besse Site Specific Administrative Requirements and Technical Specifications. Removal of section A.7 and Table 1 removes commitment to Regulatory Guides and associated standards and is considered a reduction in commitment to the previously approved QAPM. This is considered acceptable because the proposed revision continues to satisfy the criteria of 10 CFR 50 Appendix B, 10 CFR 71 Subpart H, and 10 CFR 72 Subpart G. This approach in removal of Regulatory Guides and associated standards has been previously approved by the NRC for other facilities in decommissioning status. The NRC approved the removal of commitment to specific Regulatory Guides and standards for:

- Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation - Review and Acceptance of Changes Re: Decommissioning Quality Assurance Program (EPID L-2017-LLQ-0003) dated June 27, 2018 (ML18165A136).
- Entergy Vermont Yankee Quality Assurance Program Manual Vermont Yankee Nuclear Power Station and Independent Spent Fuel Storage Facility – Review and Acceptance of Changes (EPIID L-2017-DP3-0002) dated May 1, 2018, ML18099A166.

The evaluation questions below are answered based upon the change removing specific Regulatory Guides and associated standards previously committed to in the QAPM.

Evaluation Questions:

No.	Question	Yes, No, or N/A
1	Does the proposed change involve administrative improvements and clarifications, spelling corrections, punctuation, or editorial items?	NO
	Basis for response: There are no administrative improvements for removing specific Regulatory Guides and associated standards.	
2	Does the proposed change involve the use of a QA standard approved by the NRC, which is more recent than the QA standard in the licensee's current QA program at the time of the change?	NO
	Basis for response: The DQAP is not adopting a more recent QA standard.	
3	Does the proposed change involve the use of a quality assurance alternative or exception approved by an NRC safety evaluation, provided the bases of the NRC approval are applicable to the licensee's facility? If yes, explain how the NRC approval bases from the SER are incorporated or covered by the QAPM.	NO

	Basis for response: For the most part the proposed changes are based upon: • Request for Approval of Decommissioning Quality Assurance Program, Revision 0 for Oyster Creek Nuclear Generating Station dated November 30, 2017 (ML17334A798). • Response to Request for Additional Information (RAI) Regarding Request for Approval of Decommissioning Quality Assurance Program, Revision 0 for Oyster Creek Nuclear Generating Station dated June 6, 2018 (ML18157A227). • Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation - Review and Acceptance of Changes RE: Decommissioning Quality Assurance Program (EPID L-2017-LLQ-0003) dated June 27, 2018 (ML18165A136). • Proposed Revision to the Entergy Vermont Yankee Quality Assurance Program Manual (VY QAPM) dated September 19, 2017 (ML17268A152). • Entergy Vermont Yankee Quality Assurance Program Manual Vermont Yankee Nuclear Power Station and Independent Spent Fuel Storage Facility - Review and Acceptance of Changes (EPID L-2017-DP3-0002) dated May 1, 2018 (ML18099A166). The attached comparison between the existing FENOC QAPM and the proposed Davis-Besse DQAP includes the review of the NRC approval bases from previously issued SERs. Changes made are similar to those approved by the SERs referenced above. However, applicability of the bases for approval are not identical to the changes in the proposed DQAP. Oyster Creek utilized NQA-1 as the basis for it's QA program while Davis-Besse utilized ANSI N45.2 and associated daughter standards. The Vermont Yankee change was approved based upon the plant having removed all fuel from the fuel pool and placed upon the dry fuel storage pad. Davis-Besse will be implementing the DQAP with fuel still in the spent fuel pool. This change is considered acceptable because the proposed revision will continue to satisfy the criteria of 10 CFR 50 Appendix B, 10 CFR 71 Subpart H, and 10 CFR 72 Subpart G.	
4	Does the proposed change involve the use of generic organizational position titles that clearly denoted the position function, supplemented as necessary by descriptive text, rather than specific titles?	NO
	Basis for response: This change involves removal of commitments to specific Regulatory Guides and associated standards, not a change in generic orgnizational position titles.	
5	Does the proposed change involve the use of generic organizational charts to indicate functional relationships, authorities, and responsibilities, or, alternatively the use of descriptive text?	NO
	Basis for response: This change involves removal of commitments to specific Regulatory Guides and associated standards, not a change in generic organizational charts or use of descriptive text.	
6	Does the proposed change continue to ensure that persons and organizations performing quality assurance functions continue to have the requisite authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations?	NO
	Basis for response: This question is answered no because this change removes commitments to specific Regulatory Guides and associated standards. This change does not impact the persons and organizations performing quality assurance functions and thus does not affect the authority and organizational freedom.	

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7	Does the proposed change involve the elimination of quality assurance program information that duplicates language in quality assurance regulatory guides and quality assurance standards to which the licensee is committed?	NO
	Basis for response: No duplicate language is elmiminated for the proposed change.	

Results:

☐ Change does not represent a reduction in commitment and does not require NRC approval prior to implementation (at least one question above is answered "Yes" for each evaluated change.)

Summary:

☒ Change represents a reduction in commitment and requires NRC approval prior to implementation (all questions above are answered "No" for any change evaluated.)

Summary: Removal of section A.7 and Table 1 removes commitment to Regulatory Guides and associated standards and is considered a reduction in commitment to that stated in the previously approved QAPM. This is considered acceptable because the proposed revision will continue to satisfy the criteria of 10 CFR 50 Appendix B, 10 CFR 71 Subpart H, and 10 CFR 72 Subpart G. This approach in removal of Regulatory Guides and associated standards has been previously approved by the NRC for other facilities in decommissioning status. The NRC approved the removal of commitment to specific Regulatory Guides and standards for:

- Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation - Review and Acceptance of Changes RE: Decommissioning Quality Assurance Program (EPID L-2017-LLQ-0003) dated June 27, 2018 (ML18165A136).
- Entergy Vermont Yankee Quality Assurance Program Manual Vermont Yankee Nuclear Power Station and Independent Spent Fuel Storage Facility - Review and Acceptance of Changes (EPID L-2017-DP3-0002) dated May 1, 2018 (ML18099A166).

References:

- Request for Approval of Decommissioning Quality Assurance Program, Revision 0 for Oyster Creek Nuclear Generating Station dated November 30, 2017 (ML17334A798).
- Response to Request for Additional Information (RAI) Regarding Request for Approval of Decommissioning Quality Assurance Program, Revision 0 for Oyster Creek Nuclear Generating Station dated June 6, 2018 (ML18157A227).
- Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation - Review and Acceptance of Changes RE: Decommissioning Quality Assurance Program (EPID L-2017-LLQ-0003) dated June 27, 2018 (ML18165A136).
- Proposed Revision to the Entergy Vermont Yankee Quality Assurance Program Manual (VY QAPM) dated September 19, 2017 (ML17268A152).
- Entergy Vermont Yankee Quality Assurance Program Manual Vermont Yankee Nuclear Power Station and Independent Spent Fuel Storage Facility - Review and Acceptance of Changes (EPID L-2017-DP3-0002) dated May 1, 2018 (ML18099A166).

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Review and Approvals (Print/Sign Name):

Thomas J. Kniecik / T.J. Kniecik / 3-7-2019
Fleet Oversight Evaluator Date

Larry Lockard / Larry Lockard / 3/7/2019
Supervisor, Compliance Auditing – Reviewer Date

MARK D. MCACIVAK / MARK D. MCACIVAK / 3.7.2019
Manager, Fleet Oversight – Approval Date

Decommissioning DQAP Rev 0 Fleet QAPM to Davis-Besse DQAP		
Change(s)	Evaluation and Justification	Reduction in Commitment?
Specific Changes from the FENOC Fleet QAPM to the Davis-Besse DQAP		
Table of Contents		
A.1 Methodology replaced with Policy Statement. A.2 Organization combined with A.3 in new 1.0 Organization. A.3 Responsibility combined with A.2 in new 1.0 Organization. A.4 Authority moved to new 2.0 Quality Assurance Program section. A.5 Personnel Training and Qualification moved to new 2.0 Quality Assurance Program section. A.6 Corrective Action combined with 15.0 Nonconforming Material, Parts, or Components and 16.0 Corrective Action. A.7 Regulatory Commitments now Appendix C Regulatory Commitments. B.1 Methodology deleted. B.2 Design Control moved to new 3.0 Design Control. B.3 Design Verification combined in new 3.0 Design Control.	Changes to the table of contents are considered editorial changes that do not reduce the effectiveness or commitments to the technical requirements of the DQAP.	No 50.54 (a)(3) Administrative improvement / editorial changes

B.4 Procurement Control moved to new 4.0 Procurement Document Control. B.5 Procurement Verification combined in new 4.0 Procurement Document Control and new 18.0 Audits. B.6 Identification and Control of Items moved to new 8.0 Identification and Control of Materials, Parts and Components. B.7 Handling, Storage, and Shipping moved to new 13.0 Handling, Storage, and Shipping. B.8 Test Control moved to new 11.0 Test Control. B.9 Measuring and Test Equipment Control moved to new 12.0 Control of Measuring and Test Equipment. B.10 Inspection, Test, and Operating Status moved to new 14.0 Inspection, Test, and Operating Status. B.11 Special Process Control moved to new 9.0 Control of Special Processes. B.12 Inspection moved to new 10.0 Inspection. B.13 Corrective Action moved to new 16.0 Corrective Action.		

B.14 Document Control moved to new 6.0 Document Control. B.15 Records moved to new 17.0 Quality Assurance Records. C.1 Methodology deleted. C.1 and C.2 combined to form new section 18. C.2 Audit moved to new 18.0 Audits D.1 Description deleted. Table 1 – Regulatory Commitments now Appendix C Regulatory Commitments. In addition to the new DQAP table of contents sections listed above the following new sections were added: • 5.0 Instructions, Procedures, and Drawings • 7.0 Control of Purchased Material, Equipment, and Services • 17.0 Quality Assurance Records • Appendix A Terms and Definitions • Appendix B Writing Reference Documents • Appendix D General Administrative Requirements • Appendix E Davis-Besse Site Specific Administrative Requirements		

A. Management 1. Methodology		
A. Management 1. Methodology, Reduced specific detail and included applicable statements in new Policy Statement, 2.0 Quality Assurance Program, and Appendix D General Administrative Requirements.	Implementation methodology details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. The NRC approved the reduced level of implementation details for: • The Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation by letter dated June 27, 2018 (ML18165A136).
A.2 Organization		
This is a complete rewrite to reflect the plant decommissioning status and is now Section 1.0 Organization. A number of changes were made by streamlining organizational functions to accommodate changing and consolidating responsibilities.	Changes to the organizational responsibilities are considered administrative and do not impact the reporting relationships with the Chief Nuclear Officer (CNO). The station top level management position and the corporate management position for Nuclear Oversight continue to report to the CNO.	No 50.54(a)(3)(iii) The changes continue to provide descriptive text for organizational position titles and functions with clear alignment to the CNO.
A.3 Responsibility		
Reduced specific detail and included applicable statements in 1.0 Organization.	Implementation methodology details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. The NRC approved the reduced level of implementation details for: • The Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in

	implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	an attached safety evaluation by letter dated June 27, 2018 (ML18165A136).
A.4 Authority		
Reduced specific detail and included applicable statements in 2.0 Quality Assurance Program.	Implementation methodology details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation.
A.5 Personnel Training and Qualification		
Included applicable statements in 2.0 Quality Assurance Program. Removed step d. which provided reference to the Regulatory Guides and associated standards committed to in Section A.7 and Table 1.	Removal of step d. is considered administrative due to the deletion of A.7 and Table 1. See discussion of changes for these sections.	No 50.54 (a)(3) Administrative / editorial changes
A.6 Corrective Action		
Included applicable statements in 16.0 Corrective Action	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of

	flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation.
A.7 Regulatory Commitments		
Regulatory guides, industry standards, and exceptions to those standards that are only applicable to an operating facility will not be carried over to the DQAP. The remaining regulations and quality standard will be added to Appendix C in the DQAP. These are: • 10 CFR 50, Appendix B • 10 CFR 71 Subpart H • 10 CFR 72 Subpart G • NUREG/CR 6407 Additional commitment to site specific regulatory guides, regulations, and industry standards are listed in the DQAP Appendix E Davis-Besse Site Specific Administrative Requirements and Technical Specifications.	Commitments to standards and regulatory guides with a focus on operating facilities are out of scope for a decommissioning plant. The DQAP will reflect regulatory standards that apply to decommissioning activities. Written procedures applicable to safe storage of nuclear fuel recommended in Appendix A of Regulatory Guide 1.33, shall be established, implemented, and maintained. This commitment is contained in new Appendix E, Davis-Besse Site Specific Administrative Requirements. Other regulatory commitments are contained in new Appendix C.	Yes 50.54 (a)(4) Removal of section A.7 and Table 1 removes commitment to Regulatory Guides and associated standards is considered a reduction in commitment to the previously approved QAPM. This is considered acceptable because the proposed revision continues to satisfy the criteria of 10CFR50 Appendix B, 10 CFR 71 Subpart H, and 10CFR72 Subpart G. This approach in removal of Regulatory Guides and associated standards has been previously approved by the NRC for other facilities in decommissioning status. The NRC approved the removal of commitment to specific Regulatory Guides and standards for: • The Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation by letter dated June 27, 2018 (ML18165A136).

		• Vermont Yankee Nuclear Power Station and Independent Spent Fuel Storage Facility – Review and Acceptance of Changes by letter dated May 1, 2018, ML18099A166.
B. Performance/Verification 1. Methodology		
1. Methodology deleted removing unnecessary detail that is covered by new 3.0 Design Control.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation
B.2. Design Control		
B.2 Design Control is now contained in new 3.0 Design Control. While the exact wording is not the same the new DQAP includes the design control provisions to control design inputs, performance, interfaces, verification, changes and records. The design control provisions include requirements for verifying the acceptability of design activities and documents, consistent with their effects on safety for SSCs that have important-to-safety functions.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved

	ensure QA program requirements are met.	the Design Control section of the Oyster Creek DQAP.
B.3 Design Verification		
B.3 Design Verification is now combined in new 3.0 Design Control. While the exact wording is not the same the new DQAP includes the design control provisions to control design inputs, performance, interfaces, verification, changes and records. The design control provisions include requirements for verifying the acceptability of design activities and documents, consistent with their effects on safety for SSCs that have important-to-safety functions.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Design Control section of the Oyster Creek DQAP.
B.4 Procurement Control		
B.4 Procurement Control is now contained in new 4.0 Procurement Document Control. While the exact wording is not the same the new DQAP establishes controls to assure that procured items and services are subject to quality and technical requirements at least equivalent to those specified for original equipment or specified by properly reviewed and approved revisions to assure the items are suitable for the intended service, and are of acceptable quality, consistent with their effects on safety. The DQAP requires a list of approved suppliers to be periodically audited and evaluated at an established periodicity.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Procurement Document Control section of the Oyster Creek DQAP.

B.5 Procurement Verification		
B.5 Procurement Verification is now combined in new 4.0 Procurement Document Control. While the exact wording is not the same the new DQAP establishes controls to assure that procured items and services are subject to quality and technical requirements at least equivalent to those specified for original equipment or specified by properly reviewed and approved revisions to assure the items are suitable for the intended service, and are of acceptable quality, consistent with their effects on safety. The DQAP requires a list of approved suppliers to be periodically audited and evaluated at an established periodicity.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Procurement Document Control section of the Oyster Creek DQAP.
B.6 Identification and Control of Items		
B.6 Identification and Control of Items is now contained in new 8.0 Identification and Control of Materials, Parts, and Components. While the exact wording is not the same the new DQAP establishes the necessary measures for the identification and control of items such as materials, including consumables and items with limited shelf life, parts, components, and partially fabricated subassemblies. Identification is maintained on the items or in documents traceable to the items. Provisions are included for the maintenance or	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Identification and Control of Materials, Parts, and Components section of the Oyster Creek DQAP.

replacement of markings due to aging or handling.		
B.7 Handling, Storage, and Shipping		
B.7 Handling, Storage, and Shipping is now contained in new section 13. Handling, Storage, and Shipping. While the exact wording is not the same the new DQAP establishes the necessary measures to control the handling, storage, packaging, shipping, cleaning, and preservation of items to prevent damage or deterioration. The DQAP establishes provisions to control situations in which special requirements might be needed to ensure important-to-safety SSCs will be handled, stored and shipped adequately.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Handling, Storage, and Shipping section of the Oyster Creek DQAP.
B.8 Test Control		
B.8 Test Control is now contained in new section 11. Test Control. While the exact wording is not the same the new DQAP establishes measures for a test program to demonstrate that important-to-safety SSCs will perform satisfactorily in service in accordance with decommissioning technical specifications, license conditions and design documentation. The DQAP establishes the necessary measures and governing provisions to demonstrate that items subject to these provisions will perform satisfactorily in service.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Test Control section of the Oyster Creek DQAP.

B.9 Measuring and Test Equipment Control		
B.9 Measuring and Test Equipment Control is now contained in new section 12. Control of Measuring and Test Equipment. While the exact wording is not the same the new DQAP establishes measures to control the calibration, maintenance, handling, storage and use of measuring and test equipment (M&TE), including installed plant instrumentation that provides information important-to-safety. The DQAP establishes provisions for organizational responsibilities to ensure an effective calibration program and designates the management position responsible for production as the oversight organization of the M&TE calibration process and is also responsible for governance and oversight of the site M&TE control. The DQAP also requires performance of an evaluation on the impact for important-to-safety activities conducted with as found out-of-tolerance M&TE.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Control of Measuring and Test Equipment section of the Oyster Creek DQAP.
B.10 Inspection, Test, and Operating Status		
B.10 Inspection, Test, and Operating Status is combined in new section 11. Test Control. While the exact wording is not maintained and level of detail is reduced the new DQAP establishes measures for a test program to demonstrate that important-to-safety SSCs will	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear

perform satisfactorily in service in accordance with decommissioning technical specifications, license conditions and design documentation. The DQAP establishes the necessary measures and governing provisions to demonstrate that items subject to these provisions will perform satisfactorily in service.	This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Test Control section of the Oyster Creek DQAP.
B.11 Special Process Control		
B.11 Special Process Control is now contained in new section 9.0 Control of Special Processes. While the exact wording is not the same the new DQAP establishes provisions to assure that special processes that require interim process controls such as welding, heat treating, chemical cleaning and nondestructive examination, are controlled and accomplished by qualified personnel using approved written procedures in accordance with applicable codes, standards, specifications, criteria and other special requirements.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Control of Special Processes section of the Oyster Creek DQAP.
B.12 Inspection		
B.12 Inspection is now contained in new section 10. Inspection. While the exact wording is not the same the new DQAP establishes measures for inspection of important-to-safety activities to verify conformance with specified requirements and meet the acceptance criteria established in applicable design documentation.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel

	implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Inspection section of the Oyster Creek DQAP.
B.13 Corrective Action		
B.13 Corrective Action is now contained in new section 16 Corrective Action. While the exact wording is not the same the new DQAP establishes the necessary measures to promptly identify, control, document, classify, and correct conditions adverse to quality. The DQAP requires personnel to identify known conditions adverse to quality. Significant conditions adverse to quality are documented and reported to responsible management.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Corrective Action section of the Oyster Creek DQAP.
B.14 Document Control		
B.14 Document Control is now contained in new section 6.0 Document Control. While the exact wording is not the same the new DQAP establishes provisions to specify the format and content, control the development, review, approval, issue, use, revision, and temporary changes of documents that prescribe activities affecting quality to assure that the correct documents are being employed.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Document Control section of the Oyster Creek DQAP.

B.15 Records		
B.15 Records is now contained in new section 17. Quality Assurance Records. While the exact wording is not the same the new DQAP establishes the necessary measures to ensure that sufficient records of items and activities affecting quality are identified, generated, collected, stored, maintained, and retained. The DQAP establishes provisions to ensure retrievable records show objective evidence of compliance with regulations and the DQAP implementing procedures. Concerning use of electronic records storage and management, the DQAP complies with the NRC guidance given in Regulatory Issue Summary (RIS) 2000-18, "Guidance on Managing Quality Assurance Records in Electronic Media," dated October 23, 2000.	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA program requirements are met.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Quality Assurance Records section of the Oyster Creek DQAP.
C. Assessment 1. Methodology		
C.1 Methodology is combined in new section 18. Audits. While the exact wording is not maintained and level of detail is reduced the new DQAP establishes the necessary measures to implement audits to verify compliance and implementation with all aspects of the DQAP. The DQAP establishes an internal audit program frequency commensurate with the status and importance of the activity without exceeding a 24-month period unless approved	Some specific details found in the QAPM are not included in the DQAP. The intent of the DQAP is to describe appropriate and sufficient requirements to establish how the DQAP meets 10 CFR 50 Appendix B while allowing flexibility in the manner by which a requirement is met. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved

for extension as delineated by the DQAP. The DQAP provides provisions for audit schedule, preparation, personnel selection, personnel qualification, performance, reporting, follow-up, and records management. Audits are performed by personnel having no direct responsibilities in the areas to be audited. The internal audit schedule is maintained, reviewed, and revised at least annually to ensure quality programs met regulations and standards. External audits of suppliers are conducted to ensure adequate implementation of the suppliers Quality Assurance Program at a frequency of not more than three years unless an extension is approved in accordance with the DQAP requirements. The DQAP ensures audit results are reviewed and approved in accordance with approved procedures.	ensure QA program requirements are met.	the Audits section of the Oyster Creek DQAP.
C.2. Audit		
C.1 Methodology is combined with C.2 in new section 18, Audits. The listing of specific audits and their frequency was removed. While the exact wording is not maintained and level of detail is reduced the new DQAP establishes the necessary measures to implement audits to verify compliance and implementation with all aspects of the DQAP. The DQAP establishes an internal	Section 18 of the DQAP describes the audit process including frequency of audits but in less detail. The audit program procedures will provide the necessary implementation details to meet regulations. This reduction in implementation details provides flexibility of the implementation of the DQAP while maintaining appropriate and sufficient guidance to ensure QA	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the reduced level of implementation details for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety

audit program frequency commensurate with the status and importance of the activity without exceeding a 24-month period unless approved for extension as delineated by the DQAP. The DQAP provides provisions for audit schedule, preparation, personnel selection, personnel qualification, performance, reporting, follow-up, and records management. Audits are performed by personnel having no direct responsibilities in the areas to be audited. The internal audit schedule is maintained, reviewed, and revised at least annually to ensure quality programs met regulations and standards. External audits of suppliers are conducted to ensure adequate implementation of the suppliers Quality Assurance Program at a frequency of not more than three years unless an extension is approved in accordance with the DQAP requirements. The DQAP ensures audit results are reviewed and approved in accordance with approved procedures. The Oyster Creek DQAP stated that "External audits of suppliers are conducted to ensure adequate implementation of the suppliers Quality Assurance Program at a frequency of not less than three years …". This was corrected in the Davis-Besse DQAP to a frequency	program requirements are met.	evaluation the NRC approved the Audits section of the Oyster Creek DQAP. No 50.54(a)(3) The change from performing external audits at a frequency of not less than three years to not more than three years is a clarification. Not more than three years is more restrictive than not less than three years.

of not “more” than three years.		
D. Independent Safety Review 1. Description		
Regulatory guides, requirements, industry standards, and exceptions to those standards that are only applicable to an operating facility will not be carried over to the DQAP. Independent Safety Review is deleted and a new Safety Review Committee is now described in new Appendix D General Administrative Requirements. The Safety Review Committee serves the CNO as an on-site review body that performs procedure and program reviews for decommissioning activities and ISFSI operation as necessary on matters of Nuclear Safety.	The requirement for Independent Safety Review is found in NUREG-0737, Clarification of TMI Action Plan Requirements, which was applicable to licensees of operating power reactors. This is not applicable to a decommissioning plant.	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the removal of standards and regulatory guides that are out of scope for a decommissioning plant for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation. Also, within this safety evaluation the NRC approved the Appendix D General Administrative Requirements that describe the new Safety Review Committee.
Table 1 – Regulatory Commitments		
A. Regulatory Guide 1.8 – September 1975 / ANSI N18.1 - 1971		
B. Regulatory Guide 1.30 – August 1972 / ANSI N45.2.4 – 1972		
C. Regulatory Guide 1.33 – February 1978 / ANSI N18.7 – 1976 / ANS 3.2		
D. Regulatory Guide 1.37 – March 1973 / ANSI N45.2.1 – 1973		
E. Regulatory Guide 1.38 – May 1977 / ANSI N45.2.2 – 1978		
F. Regulatory Guide 1.39 – September 1977 / ANSI N45.2.3 – 1973		
G. Regulatory Guide 1.58 – September 1980 / ANSI N45.2.6 – 1978		
H. Regulatory Guide 1.64 – June 1976 / ANSI N45.2.11 – 1974		
I. Regulatory Guide 1.74 – February 1974 / ANSI N45.2.10 - 1973		
J. Regulatory Guide 1.88 – October 1976 / ANSI N45.2.9 – 1974		
K. Regulatory Guide 1.94 – April 1976 / ANSI N45.2.5 – 1974		
L. Regulatory Guide 1.116 – May 1977 / ANSI N45.2.8 – 1975		
M. Regulatory Guide 1.123 – July 1977 / ANSI N45.2.13 – 1976		
N. Regulatory Guide 1.144 – September 1980 / ANSI N45.2.12 – 1977		
O. Regulatory Guide 1.146 – August 1980 / ANSI N45.2.23 – 1978		
Table 1 – Regulatory Commitments is deleted and Regulatory Commitments are now contained in new	Commitments to standards and regulatory guides with a focus on operating facilities are out of scope for a	Yes 50.54 (a)(4) Removal of section A.7 and Table 1 removes commitment to Regulatory Guides and

Appendix C. This is a complete rewrite to reflect the plant decommissioning status. Regulatory guides, industry standards, and exceptions to those standards that are only applicable to an operating facility will not be carried over to the DQAP. The remaining regulations and quality standard will be added to new Appendix C in the DQAP. These are: • 10 CFR 50, Appendix B • 10 CFR 71 Subpart H • 10 CFR 72 Subpart G • NUREG/CR 6407 NUREG/CR 6407 "Classification of Transportation Packaging and Dry Fuel Storage System Components According to Importance to Safety" (Revision 1 - October 2013) Additional commitment to site specific regulatory guides, regulations, and industry standards are listed in the DQAP new Appendix E, Davis-Besse Site Specific Administrative Requirements and Technical Specifications.	decommissioning plant. The DQAP will reflect regulatory standards that apply to decommissioning activities. Written procedures applicable to safe storage of nuclear fuel recommended in Appendix A of Regulatory Guide 1.33, shall be established, implemented, and maintained. This commitment is contained in new Appendix E, Davis-Besse Site Specific Administrative Requirements.	associated standards is considered a reduction in commitment to the previously approved QAPM. This is considered acceptable because the proposed revision will continue to satisfy the criteria of 10CFR50 Appendix B, 10 CFR 71 Subpart H, and 10CFR72 Subpart G. This approach in removal of Regulatory Guides and associated standards has been previously approved by the NRC for other facilities in decommissioning status. The NRC approved the removal of commitment to specific Regulatory Guides and standards for: • The Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation by letter dated June 27, 2018 (ML18165A136). • Vermont Yankee Nuclear Power Station and Independent Spent Fuel Storage Facility – Review and Acceptance of Changes by letter dated May 1, 2018, ML18099A166.
New DQAP Sections not previously included in FENOC QAPM		
5.0 Instructions, Procedures, and Drawings Instructions, Procedures and Drawings was not previously contained as a separate	Consolidation of requirements from various sections is considered an administrative improvement. The Oyster Creek Nuclear	No 50.54 (a)(3) Administrative improvement. By letter dated June 27, 2018 (ML18165A136) for the

section in the FENOC QAPM. Previous requirements were found in various sections such as A.3.f.; Procedures that implement the QAPM are approved by the management responsible for the applicable quality function. These procedures are to reflect the QAPM and work is to be accomplished in accordance with them.	Generating Station and Independent Spent Fuel Storage Installation DQAP was used as a guide.	Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP the NRC approved an identical section 5.0 Instructions, Procedures and Drawings.
7.0 Control of Purchased Material, Equipment, and Services This section was not previously contained as a separate section in the FENOC QAPM. Previous requirements were found in various sections such as B.4, Procurement Control, B.5 Procurement Verification, B.6, Identification and Control of Items.	Consolidation of requirements from various sections is considered an administrative improvement. The Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP was used as a guide.	No 50.54 (a)(3) Administrative improvement. By letter dated June 27, 2018 (ML18165A136) for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP the NRC approved an identical (except change of company name) section 7.0 Control of Purchased Material, Equipment, and Services.
17.0 Quality Assurance Records This section was not previously contained as a separate section in the FENOC QAPM. Previous requirements were found in various sections such as B.2.h; Design Documentation and records, which provide evidence that the design and design verification process was performed in accordance with this program, shall be collected, stored, and maintained in accordance with documented procedures.	Consolidation of requirements from various sections is considered an administrative improvement. The Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP was used as a guide.	No 50.54 (a)(3) Administrative improvement. By letter dated June 27, 2018 (ML18165A136) for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP the NRC approved an identical section 17.0 Quality Assurance Records.

Appendix A Terms and Definitions This section was not previously contained in the FENOC QAPM. Previous terms and definitions were found in various commitments such as ANSI N45.2.10 – 1973, Quality Assurance Terms and Definitions. Added: DC Phase 5 and 6; ANSI N45.2.10 – 1973, Quality Assurance Terms and Definitions; NUREG-1536 Revision 1, Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility; and NUREG-1757 Vol.1, Rev.2, Consolidated Decommissioning Guidance as references to the approved Oyster Creek DQAP.	Consolidation of requirements from various sections is considered an administrative improvement. The Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP was used as a guide.	No 50.54 (a)(3) Administrative improvement. By letter dated June 27, 2018 (ML18165A136) for the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP the NRC approved a similar Appendix A Terms and Definitions.
Appendix B Writing Reference Documents This section was not previously contained in the FENOC QAPM. Using the approved Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP as a guide and adding: NUREG-1536 Revision 1, Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility, Section 14 Quality Assurance Evaluation; and NUREG-1757 Vol.1, Rev.2, Consolidated Decommissioning Guidance,	Addition of these reference documents is for information only. This information does not affect the technical requirements of the DQAP or regulatory and industry standards.	No 50.54 (a)(3) Administrative improvement. Addition of reference documents is for information only and follows the example in the letter dated June 27, 2018 (ML18165A136) the NRC approved the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation which included approval of section Appendix B Writing Reference Documents.

Section 17.6 Decommissioning Plan: Quality Assurance Program; and SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION DECOMMISSIONING QUALITY ASSURANCE PROGRAM, REVISION 0 EXELON GENERATION COMPANY, LLC OYSTER CREEK NUCLEAR GENERATING STATION AND INDEPENDENT SPENT FUEL STORAGE INSTALLATION DOCKET NOS. 50-219 AND 72-15 to the approved Oyster Creek DQAP; and Entergy Vermont Yankee Quality Assurance Program Manual Vermont Yankee Nuclear Power Station and Independent Spent Fuel Storage Facility – Review and Acceptance of Changes (EPID-L-2017-DP3-0002) May 1, 2018, ADAMS Accession No. ML18099A166.		
Appendix C Regulatory Commitments The Appendix did not previously exist in the FENOC QAPM. Regulatory Commitments were previously contained in Table – 1 Regulatory Commitments. The table was deleted and this Appendix created.	The DQAP will reflect regulatory standards that apply to decommissioning activities and that are not already reflected in site FSAR, DSAR. or Technical Specifications. The requirement for written procedures applicable to safe storage of nuclear fuel recommended in Appendix A of Regulatory Guide 1.33, shall be established, implemented, and maintained	No 50.54 (a)(3) Administrative improvement. By letter dated June 27, 2018 (ML18165A136) the NRC approved the identical Appendix C Oyster Creek DQAP containing commitments to: 10 CFR 50, Appendix B 10 CFR 71 Subpart H 10 CFR 72 Subpart G NUREG/CR 6407

	is contained in new Appendix E, Davis-Besse Site Specific Administrative Requirements. Creation of the Appendix for this proposed revision is an administrative improvement.	Also, contained in the approved DQAP Appendix E is a commitment to establish, implement and maintain written procedures applicable to safe storage of nuclear fuel recommended in Appendix A of Regulatory Guide 1.33.
Appendix D General Administrative Requirements This section was not previously contained in the FENOC QAPM. This new section contains requirements for: 1. Fire Protection describing program requirements for a decommissioning facility. 2. Transport of Radioactive Waste describing shipping requirements. 3. Services describing requirements for Meterology, Offsite Dose Calculation Manual, and Radiological Environmental Monitoring. 4. License Renewal requirements for aging management. Note: this was contained in the FENOC QAPM A.1.f. 5. Safety Review Committee description.	Addition of these administrative requirements does not affect the technical requirements of the DQAP. Including this level of detail is an administrative improvement.	No 50.54(a)(3) Administrative Improvement No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation which included approval of section Appendix D General Administrative Requirements.
Appendix E Davis-Besse Site Specific Administrative Requirements	Addition of this Appendix describes the level of commitment for a decommissioning facility to	No 50.54 (a)(3)(ii) The use of a quality assurance alternative or exception approved by an NRC safety

This section was not previously contained in the FENOC QAPM. This new section contains requirements for: 1. RG 1.33 requirement for procedures applicable to safe storage of nuclear fuel. 2. Independent Spent Fuel Storage Installation (ISFSI) describing QA program requirements are performed in accordance with the applicable 10CFR72.2212 report. 3. Records Retention describing which records are maintained for a decommissioning facility.	RG 1.33, how the ISFSI quality program requirements are performed, and which records are maintained and their duration. The FENOC QAPM previously committed to RG 1.33 concerning procedures and to ANSI N45.2.9-1974 for records. Commitments to standards and regulatory guides with a focus on operating facilities are out of scope for a decommissioning plant. Therefore, the applicable requirements are now captured in this Appendix. No changes were made to the NRC approved Appendix E other than change the title from Oyster Creek to Davis-Besse. See discussion on changes to Table 1 for discussion regarding removal of commitments.	evaluation. By letter dated June 27, 2018 (ML18165A136) the NRC approved the Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation DQAP in an attached safety evaluation which included approval of section Appendix E Oyster Creek Site Specific Administrative Requirements. No 50.54(a)(3) Changing the title from Oyster Creek to Davis-Besse is considered a clarification.

Enclosure B
L-19-038

FENOC Decommissioning Quality Assurance Program for the
Davis-Besse Nuclear Power Station, Revision 0
(40 pages, excluding this page)

FENOC

DECOMMISSIONING QUALITY ASSURANCE PROGRAM (DQAP)

Revision 0

Davis-Besse Nuclear Power Station

Docket No. 50-346

License No. NPF-3

Approved By: _____Date _____
Vice President, Fleet Oversight

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Policy Statement

The Decommissioning Quality Assurance Program (DQAP) is the highest tiered document that assigns major functional responsibilities for decommissioning facilities owned and operated by FirstEnergy Nuclear Operating Company (FENOC) (the Company).

Implementing documents assign more specific responsibilities and define the organizational interfaces involved in conducting safety-related and important to safety activities within the scope of this DQAP. These requirements apply to those organizations and positions, which manage and perform activities within its scope.

The Company organization is structured on the basis that the attainment of the objectives of this Program relies on those who manage, perform, and support the performance of activities within the scope of the DQAP. Assurance of this attainment relies on those who have no direct responsibility for performing the activity.

The Company will maintain our decommissioning facilities in a manner that will ensure the health and safety of the public and our workers. All facilities shall, at a minimum, comply with the applicable requirements of the Code of Federal Regulations, NRC Licenses, and the laws and regulations of the state and local governments.

1. ORGANIZATION

The Company is responsible for the establishment and execution of the DQAP at sites that have submitted a Certification of Permanent Cessation of Operations and Certification of Permanent Removal of Fuel from the Reactor Vessel to the NRC per 10 CFR 50.82(a)(1)(i) and (ii), respectively. The titles of managers used in the DQAP are generic, or functional titles and their formal titles may vary. Unless otherwise specifically prohibited, responsibilities of managers described in the DQAP may be delegated to, and be performed by, other qualified individuals. Positions below the Chief Nuclear Officer (CNO) may report through an additional layer of management but shall maintain sufficient authority and organizational freedom to implement their assigned responsibilities. Establishment of site organizations will be commensurate with the activities and risks associated with Decommissioning (DC) Phases 2, 3, 4, 5, and 6. The different phases are defined in Appendix A of this DQAP.

1.1. Responsibilities

1.1.1. The authorities and duties of persons and organizations performing activities within the scope of this DQAP are established and delineated in writing. These activities include both performing the functions of attaining quality objectives and the Quality Assurance functions.

1.1.2. All Company personnel who work directly, or indirectly, for the Company are responsible for the achievement of quality in their work. Accordingly, all Company personnel and its contractors engaged in supporting decommissioning activities shall comply with the requirements of this DQAP.

1.1.3. The overall responsibility for operation, maintenance, inspection, test, modification, decommissioning, and storage of spent fuel resides with the Chief Nuclear Officer (CNO), FENOC. The top level management position responsible for the administration and implementation of the DQAP at Davis-Besse resides at the station and reports to the CNO.

1.1.4. The DQAP is reviewed and approved by the management position responsible for Nuclear Oversight. The management position responsible for Nuclear Oversight is responsible for periodically apprising the CNO on the effectiveness of the DQAP implementation and immediately apprises the CNO of significant problems affecting quality.

1.1.5. Management of line organizations at Davis-Besse are responsible to ensure that the quality of work and activities meets the requirements set forth in the technical specifications, this DQAP, and implementing procedures.

1.2. Corporate Organizations

1.2.1. The Chief Nuclear Officer (CNO), FENOC, has overall responsibility for the safe and reliable operation of the Company's nuclear stations. This is the management position responsible for setting and implementing policies, objectives, expectations, and priorities to ensure activities are performed in accordance with the DQAP and other requirements. The Safety Review Committee provides periodic updates to the CNO. The following management positions report to and/or receive direction from the CNO with respect to their assigned roles and responsibilities associated with the execution of this DQAP:

- The station top level management position described in Section 1.3.1.
- A corporate management position responsible for Nuclear Oversight reports to the CNO and is responsible to provide management and oversight to ensure compliance with the DQAP. The following management position reports to this position:
  - A management position responsible for Davis-Besse Nuclear Oversight maintains a staff to verify the DQAP is effectively implemented. Nuclear Oversight personnel shall have sufficient authority and organizational freedom to identify any quality problems and to verify implementation of corrective actions. Additionally, Nuclear Oversight personnel shall have direct access to appropriate levels of management necessary to perform their function and shall be independent from cost and schedule when opposed to quality and safety considerations. This position may be responsible for a single station or for multiple stations. Functional responsibilities include:
    - Managing the performance of periodic audits and quality verification inspections in order to verify that activities within the scope of this DQAP have been correctly performed.
    - Establishing quality assurance practices and policies.
    - Authority and obligation to raise any conditions adverse to quality to the CNO for resolution as necessary.
    - Assuring quality activities are performed in accordance with implementing procedures.
    - Reporting on oversight activities to the CNO.
    - Authority to stop work when quality is adversely affected.

1.2.2. Additional support organizational activities such as emergency preparedness, licensing, calibrations, procurement, training, legal, communications, records and document control, information technology, business operations, and human resources may be provided by the station or by corporate or contracted organizations.

1.3. Station Management

1.3.1. The following station management positions describe the typical station DQAP functional responsibilities, which may be delegated to others as established in this document. The specific organization titles for the quality assurance functions are identified in procedures. The authority to accomplish the quality assurance functions described is delegated to the incumbent's staff as necessary to fulfill the identified responsibility. These functions may be performed by the same individuals and may report through an additional layer of management but shall maintain sufficient authority and organizational freedom to implement the assigned responsibilities.

- The station top level management position reports to the CNO and is responsible for station activities and the implementation of quality assurance policies, goals and objectives. These responsibilities also include, but are not limited to functional areas, such as maintenance, engineering, projects, operations, emergency planning, and security. The following positions report to this individual:
  - A management position responsible for production with responsibility for station maintenance, procurement, projects, and planning that support nuclear and personnel safety within the constraints of the decommissioning license and regulatory requirements.
  - A management position responsible for engineering is responsible for the development and maintenance of engineering programs, facility design bases, engineering services and information technology.
  - A management position responsible for implementation of the Radiation Protection Program, Radiological Environmental Monitoring Program, Radiological Effluent Controls Program, radioactive waste shipping, Process Control Program and chemistry activities.
  - A management position responsible for overall operational activities is accountable for maintaining the facility within the constraints of the applicable regulatory requirements and the license.
  - A management position responsible for regulatory assurance is accountable for implementation of the Emergency Plan, Corrective Action Program, Security Plan, and licensing activities.

2. QUALITY ASSURANCE PROGRAM

2.1. The Davis-Besse QA Program is described in this DQAP which provides control over activities affecting quality to an extent consistent with their importance to safety and compliance. The DQAP includes specific monitoring activities which are measured against acceptance criteria in a manner sufficient to provide Company management assurance that the activities affecting quality are performed in an acceptable manner. The DQAP requirements apply to (i.e. the following are in the scope of the DQAP) systems, structures, or components (SSCs) designated as safety related and important to safety, regulatory programs, and for other activities and SSCs identified in either the facility specific Defueled Safety Analysis Report (DSAR) or Appendix of this DQAP.

2.2. The DQAP satisfies the requirements of 10 CFR 50 Appendix B, *Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants,* 10 CFR 71 Subpart H, *Quality Assurance for Packaging and Transportation of Radioactive Material,* and 10 CFR 72 Subpart G, *Quality Assurance for Independent Storage of Spent Nuclear Fuel and High-Level Radioactive Waste*. Regulatory commitments are listed within Appendix C of the DQAP. Implementation of this DQAP is controlled through separately issued procedures, instructions, and drawings. Each organization is responsible for the establishment and implementation of procedures and instructions prescribing the activities within the scope of this DQAP for which they are responsible.

2.3. Activities affecting quality shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanliness; and assurance that all prerequisites for the given activity have been satisfied. The DQAP takes into account the need for special controls, processes, test equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection and test where required.

2.4. Changes to the DQAP will be implemented in accordance with 10 CFR 50.54(a).

2.5. Program Control and Authority

2.5.1. The management position responsible for Nuclear Oversight is responsible for ensuring the applicable portions of the DQAP are properly documented, approved and implemented. Disputes arising between departments or organizations on any QA matter that cannot be resolved at a lower level of management will be referred to the CNO.

2.5.2. Additional requirements for specific programs are described in Administrative Controls of technical specifications or in the DQAP, with the exception of security requirements which are contained in the Physical Security Plan; and Emergency Plan requirements which are contained within the Site Emergency Plan. Fire Protection Program requirements are addressed in Appendix D of this DQAP.

2.6. Program Review

2.6.1 The status and effectiveness of the DQAP and its implementation is periodically reviewed by the management of the organization responsible for its execution. In addition, the effectiveness of the DQAP is evaluated and reported by Nuclear Oversight through the audit and inspection functions.

2.7. Personnel Training and Qualifications

2.7.1. Personnel assigned to implement elements of the quality assurance program are capable of performing their assigned tasks.

2.7.2. Training programs are established and implemented to ensure that personnel achieve and maintain suitable proficiency.

2.7.3. Personnel training and qualification records are maintained in accordance with procedures.

3.0. DESIGN CONTROL

3.1. Measures shall be established to assure that the designs, including applicable regulatory requirements and design bases, technical and quality requirements are correctly translated to design documents which include specifications, drawings, procedures and instructions. The Company has overall responsibility for design and design control activities including, preparing, reviewing, approving, and verifying design documents related to the facility's SSCs within the scope of the DQAP.

3.2. Design changes to SSCs within the scope of this DQAP shall be properly controlled using design control measures commensurate with those applied to the original design. Design changes are reviewed and approved by the same design groups cognizant in the discipline affected by the change that reviewed and approved the original documentation unless alternative design groups are designated. Design activities associated with the facility changes or modifications may be performed by the Company or qualified contractors. Design groups shall have access to background information, shall be competent in the specific area of design interest, and shall understand the requirements and intent of the original design.

3.3. Measures shall be established for the selection and review for suitability of application of materials, parts, equipment, and processes that are essential to SSCs that have current safety-related and important to safety functions. Design control implementing procedures shall define responsibility for the following:

- Design Input
- Design Performance
- Design Interface Control
- Design Verification
- Design Change

3.4. Design inputs shall be identified, documented and correctly translated into design outputs. Design inputs shall be specified to a level of detail necessary to allow the design activities to be carried out in a controlled manner. The final design output shall relate to the design input in sufficient detail to facilitate design verification.

3.5. The design organization shall prescribe and document the design activities to the level of detail necessary to permit the design process to be completed in a correct manner which permits verification that the design meets requirements. Design documents shall support facility design, construction, safe storage and handling of spent fuel, and decommissioning projects. Appropriate quality standards shall be identified and documented, and their selection reviewed and approved. Deviations from original design standards shall be reviewed to ensure that the designated quality requirements remain in the design of SSCs as applicable.

3.6. Design control measures shall be applied to those SSCs within the scope of this DQAP. Design analyses shall be sufficiently detailed such that a person technically qualified in the subject can review and understand the analyses and verify the adequacy of the results without additional input.

3.7. Design interfaces for SSCs within the scope of this DQAP shall be identified and controlled. Interface controls shall include the assignment of responsibility and the establishment of procedures among participating design organizations. Controls shall be established for the review, approval, release, distribution and revision of documents involving design interfaces. Design information transmitted across interfaces shall be documented and controlled.

3.8. Changes or modifications to designated SSCs shall be approved by the Design Authority or designee. Procedures for implementing design changes and field changes shall assure that the impact of the change is considered, required actions documented, and information concerning the change transmitted to affected persons or organizations. Applicable regulatory criteria (i.e. 10 CFR 50.59, 10 CFR 50.82(a), or 10 CFR 72.48) shall be used to determine if NRC approval is required prior to implementation of a design change. For SSCs within the scope of this DQAP, these changes shall be subject to design control measures commensurate with those applied to the original design.

3.9. Design verification for SSCs within the scope of this DQAP shall provide assurance that the final design is correct and has been performed in accordance with approved procedures describing position responsibilities and authorities for the design reviews. Documentation to be reviewed for this design work includes the necessary calculations and/or analysis, design criteria specifications, drawings, procedures, and instructions to permit a comprehensive review.

3.10. Design verification may be accomplished through design reviews, alternate calculations, or qualification testing. These methods of design verification are defined in design procedures as applicable. The results of the design verification activities shall be documented with the identification of the verifier

clearly documented. Design verification shall be performed by competent individual(s) other than those who performed the original design but may be from the same organization. This verification may be performed by the originator's supervisor, provided the supervisor did not specify a singular design approach, rule out certain design considerations, did not establish the design inputs used in the design, or the supervisor is the only individual in the organization competent to perform the verification. Cursory supervisory reviews do not satisfy the intent of design verification. Design verification shall be completed prior to relying upon the SSC to perform its important to safety function.

3.11. Nonconforming activities such as deviations, errors, or deficiencies in the approved design documents, including design methods (e.g., computer codes), shall be identified, documented, and controlled. Computer programs used to calculate or develop data for important to safety activities shall be subject to validation and verification.

3.12. Design documentation and records which provide evidence that the design and design verification process was performed in accordance with the DQAP, shall be collected, stored and maintained in accordance with approved procedures. This documentation includes final design documents, such as drawings, specifications, calculations, and revisions there to and documentation which identifies important steps, including sources of design inputs that support the final design.

4.0. PROCUREMENT DOCUMENT CONTROL

4.1. Measures shall be established for the preparation, review, and approval of procurement documents for those items and activities within the scope of this DQAP. Procurement documents include or reference the appropriate regulatory, technical, and quality requirements necessary to assure adequate quality for those materials, equipment, and services that are within the scope of this DQAP. Measures are established to assure that, to the extent necessary, contractors or subcontractors provide a QA Program consistent with the provisions of 10 CFR 50 Appendix B, 10 CFR 71 Subpart H, or 10 CFR 72 Subpart G, and 10 CFR 21, as applicable.

4.2. The Company maintains a controlled list of evaluated suppliers that are audited on a triennial basis. The evaluated list of such vendors, suppliers, and contractors is described in controlling procedures for the appropriate important to safety classification except for procurement from other licensees that have a NRC approved quality program.

4.3. Procurement documents require the vendors to incorporate quality assurance program requirements in sub-tier procurement documents and allow right of access to the vendors, sub-tier vendors, and contractors facilities and records for inspection or audit by the Company or its designated representative.

4.4. Procurement document control applies to SSCs within the scope of this DQAP and any spare or replacement parts for those SSCs. Procurement documents shall include those requirements necessary to assure that the items and services to be provided meet the specified technical and quality requirements. Specifically, the procurement system assures that the appropriate technical and quality requirements are specified for procurement of items and services considering the important to safety function, complexity of the design, manufacturing, degree of inspection/testability upon receipt and other factors which affect the quality of products and services.

4.5. Procedures that implement procurement document control shall describe the organizational responsibilities for procurement planning, preparation, review, approval and control of procurement documents; supplier selection; bid evaluation; identification of replacement parts where applicable; and review and evaluation of supplier's QA Program prior to release for bid and contract award for activities within the scope of this DQAP.

4.6. Procedures shall be established to review the adequacy of the technical and QA requirements specified within procurement documents. Personnel who have access to pertinent information and who have an adequate understanding of the requirements and intent of the procurement documents shall perform reviews required to ensure the adequacy of the technical and QA requirements. Changes to procurement documents shall be subject to the same controls as the original documents.

5.0. INSTRUCTIONS, PROCEDURES AND DRAWINGS

5.1. Measures shall be established to assure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, and drawings. Documented and approved instructions, procedures, and drawings are required to accomplish work on SSCs within the scope of this DQAP.

5.2. These instructions, procedures, and drawings include, as appropriate, quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished. Procedures may include reference to vendor equipment manuals, design drawings and specifications, prerequisites, special precautions, and the delineation of work to be performed. Equipment manuals and manufacturer's instructions shall be readily available for use as appropriate.

5.3. Controls are established which ensure that instructions, procedures, and drawings are current and accurately reflect plant design and regulatory requirements. Documents comprising of instructions, procedures, specifications, and drawings prepared by outside contractors for the performance of site activities are reviewed and approved by the responsible manager or designated representative.

6.0. DOCUMENT CONTROL

6.1. Measures shall be established to control the issuance of documents, such as instructions, procedures, drawings, including changes thereto, which prescribe activities affecting quality and activities within the scope of this DQAP. These measures assure that documents, such as procedures, instructions and drawings, are reviewed for adequacy by qualified personnel other than the personnel that prepared the document, approved for release and use, and available at the location where the activity is performed. Written procedures shall define the type of documents to which the document control system applies. These procedures also define the process for controlling the preparation, review, approval, issuance, and distribution.

6.2. Documents and changes to documents that prescribe or verify activities within the scope of this DQAP shall be controlled in a manner that precludes the use of inappropriate or outdated documents. The document control system procedures shall be established to identify the current revision of instructions, procedures, specifications, drawing and procurement documents.

6.3. Changes to documents shall be reviewed and approved by the same organization that performed the original review and approval unless another qualified organization has been designated. Administrative controls shall be established that provide the methods by which temporary changes can be made to procedures which are approved, including the designation of persons authorized to approve such changes, and the time period during which they may be used. Minor changes to documents, such as inconsequential editorial corrections, shall not require that the revised documents receive the same review and approval as the original documents. To avoid a possible omission of a required review, the type of minor changes that do not require such a review and approval and the persons who can authorize such a decision shall be clearly delineated.

7.0. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

7.1. Measures shall be established for the control of purchased material, equipment, and services to assure they conform to the procurement documents as they apply to activities within the scope of this DQAP. These measures provide for the following as appropriate: source evaluation and selection, evaluation of objective evidence of quality furnished by the supplier, source inspection, audit, and examination of items or services. Procedures shall describe each organization's responsibilities for the control of purchased material, equipment, and services, including the interfaces between all affected organizations.

7.2. Verification that a supplier can meet the specified technical and quality requirements shall be documented. The Company maintains a controlled list of evaluated suppliers that are audited on a triennial basis. Documented supplier performance monitoring is performed in accordance with approved procedures as an acceptable alternate to the performance of the annual evaluation of suppliers. The evaluated list of such vendors, suppliers, and contractors is described in controlling procedures for the appropriate important to safety classification except for procurement from other licensees that have an NRC approved quality program. Suppliers of commercial grade calibration or testing services may be qualified based on their accreditation by a nationally - recognized accrediting body, as an alternative to qualification by supplier audit, commercial grade survey, or in-process surveillance as described below.

7.3. This DQAP considers that other 10 CFR Parts 50 and 52 licensees, Authorized Nuclear Inspection Agencies, National Institute of Standards and Technology, or other State and Federal agencies which may provide items or services to the facility are not required to be evaluated or audited.

7.4. Commercial grade calibration and/or testing services may be procured from domestic and international commercial calibration and/or testing laboratories based on the laboratory's accreditation to ISO/IEC-17025 by an Accreditation Body (AB) which is a signatory to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) provided all of the following are met:

7.4.1. A documented review of the supplier's accreditation is performed and includes a verification of the following:

- The calibration or test laboratory holds accreditation by an accrediting body recognized by the ILAC MRA. The accreditation encompasses ISO/IEC-17025:2005, "General Requirements for the Competence of Testing and Calibration Laboratories."
- For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties.
- For procurement of testing services, the published scope of accreditation for the test laboratory covers the needed testing services including test methodology and tolerances / uncertainty.

7.4.2. The purchase documents require that:

- The service must be provided in accordance with their accredited ISO/IEC-17025:2005 program and scope of accreditation.
- As found calibration data must be reported in the certificate of calibration when calibrated items are found to be out-of-tolerance. (For calibration services only)
- The equipment /standards used to perform the calibration must be identified in the certificate of calibration. (For calibration services only)
- The customer must be notified of any condition that adversely impacts the laboratory’s ability to maintain the scope of accreditation.
- Additional technical and quality requirements, as necessary, based upon a review of the procured scope of services, which may include, but are not necessarily limited to, tolerances, accuracies, ranges, and industry standards.

7.4.3. It is validated, at receipt inspection, that the laboratory's documentation certifies that:

- The contracted calibration or test service has been performed in accordance with their ISO/IEC-17025:2005 program, and has been performed within their scope of accreditation; and
- The purchase order's requirements are met.

7.5. The effectiveness of contractor's and supplier's QA program shall be assessed at intervals consistent with the importance, complexity, and quantity of the product or service. Supplier performance and compliance with procurement documents are monitored by source verification, receipt inspection, audit, or a combination to ensure continued acceptable supplier performance. Receiving inspection shall verify, by objective evidence, the acceptability of items in accordance with facility procedures. Accepted items are appropriately marked and located in a controlled storage area until use. Documentary evidence shall be retained in accordance with facility requirements and applicable regulatory requirements and shall be sufficient to identify the specific requirements, such as codes, standards, or specifications, met by the purchased material and equipment.

7.6. For acquiring of services only, such as: third-party inspection, engineering and consulting services; auditing and installation; and repair, overhaul, or maintenance work from suppliers whose QA Program has not been reviewed or accepted; those suppliers may be used provided additional controls such as technical verification of data produced, surveillance and/or audit of the activity, or review of objective evidence are employed. These additional controls shall be documented in the request for services and approved by the appropriate level of management.

7.7. Spare and replacement parts are procured such that their performance and quality are at least equivalent to those of the parts that will be replaced, as determined by engineering where applicable.

7.8. Designated quality personnel or other personnel with appropriate qualifications are responsible for assuring source inspections, surveys, or audits of suppliers are performed as necessary. Documentation of acceptance shall be available prior to installation or acceptance for use.

8.0. IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

8.1. Measures shall be established for the identification and control of material, parts, and components, including partially fabricated assemblies and consumables, to assure that only correct and accepted items are used or installed. Identification is maintained on the items or in documents traceable to the items, and physical identification shall be used to the maximum extent possible. If physical identification is either impractical or insufficient for proper control, the Company controls an item by physical separation, procedural control or other appropriate means.

8.2. Markings are applied using materials and methods that are clear, legible and do not detrimentally affect the function or service life of the items that are marked. Markings are transferred to each part of an identified item prior to being subdivided. Markings are not obliterated or masked by surface treatments or coatings unless alternative identification methods are established. When codes, standards, or specifications require specific identification or traceability requirements of an item, procedures shall describe how to maintain traceability as applicable.

8.3. Provisions are made in procedures for maintenance or replacement of markings or identification due to damage from handling or aging, excessive deterioration due to environmental exposure, and for updating records while in storage. Items having limited shelf or operating life are controlled to preclude use after the shelf life or operating life has expired.

9.0. CONTROL OF SPECIAL PROCESSES

9.1. Measures shall be established to assure that special processes that require interim process controls to assure quality, such as welding, heat treating, and nondestructive examination, are controlled. These provisions include assuring that special processes are accomplished by qualified personnel using instructions, procedures, drawings, checklists, or other appropriate means. Personnel are qualified and special processes are performed in accordance with applicable codes, standards, specifications, criteria or other specially established requirements. Special processes are those where the results are highly dependent on the control of the process or the skill of the operator, or both, and for which the specified quality cannot be fully and readily determined by inspection or test of the final product. Records are maintained, as appropriate, for the qualified personnel, processes, and equipment.

9.2. The Company qualifies NDE personnel in accordance with the applicable editions of the codes and standards accepted by the NRC as identified in Company NDE procedures.

10. INSPECTION

10.1. Measures shall be established for inspection of activities within the scope of this DQAP by or for the organization performing the activity, in order to verify conformance with approved instructions procedures, drawings, and specifications for accomplishing the task.

10.2. A comprehensive program of inspections shall be established and implemented to verify conformance of an item or activity with the specified requirements and inspection methods used and will be performed by personnel qualified to validate that the activities meet the acceptance criteria specified in applicable design documents. Inspections shall be performed by qualified individuals other than those who perform or directly supervise the activity being inspected.

10.3. Where mandatory hold or witness points are required for witness or inspection activities by designated personnel, the designated hold points shall be indicated in appropriate documentation. Work shall not progress beyond the point of an assigned hold point unless the inspection is complete or consent to waive the hold point is given by the designated organization.

10.4. Inspections shall be planned to ensure the characteristic to be inspected and the methods used to perform the inspection and acceptance criteria are documented. If inspection of processed or fabricated items is impractical, monitoring of the processing method and equipment shall be utilized. Process monitoring shall be performed by qualified personnel or a qualified automated process. Inspection and process monitoring shall both be used if quality control is inadequate without both.

10.5. Final inspections shall include record review and examinations, measurements/tests as appropriate to verify adequate quality measures were employed in the construction, fabrication and/or processing. Final inspection results shall document the as-found condition including final acceptance/rejection criteria evaluation.

10.6. Unacceptable inspection results shall be evaluated and resolved in accordance with approved procedures. Any modifications, repairs, and replacements are re-inspected to the same standard or method to verify acceptability of the items. Inspection records shall identify the item inspected, date of inspection, inspector’s identity, results of inspection, and reference to information taken in connection with nonconformances.

11. TEST CONTROL

11.1. Measures shall be established for a documented test program in accordance with applicable technical specifications, license conditions, and design documents to assure that all required testing demonstrate that the structures, systems, or components within the scope of this DQAP will perform satisfactorily in service. The test program shall ensure that design and performance criteria have been satisfied and that the testing does not adversely affect the important to safety SSCs.

11.2. The test program shall include criteria for determining when testing is required, such as proof tests prior to installation, preoperational tests, and operational tests of SSCs. The procedures that implement testing shall specify the appropriate prerequisites for the test (e.g., personnel qualification requirements, environmental conditions, equipment requirements) sufficient instruction for the performance of the testing, hold or witness points, acceptance/rejection criteria and limits, and the required test documentation. Test results are evaluated by qualified personnel to determine compliance with established acceptance criteria. Test results which do not meet acceptance criteria, shall be documented and evaluated in order to determine the appropriate corrective actions. The test program shall require that modifications, repairs, and replacement of items that have a current important to safety function be tested, utilizing the same criteria as the original items to the extent applicable to the current important to safety function. If alternative tests are required, the alternative tests must be reviewed and approved by the same organization that established the original requirements unless the applicable manager designates another responsible organization. Test records shall be maintained in accordance with approved procedures.

12. CONTROL OF MEASURING AND TEST EQUIPMENT

12.1. Measures shall be established to assure those tools, gauges, instruments, and other measuring and test equipment (M&TE), used for activities within the scope of this DQAP, are controlled, calibrated and adjusted in order to maintain accuracy within necessary limits and to ensure its traceability to calibration test data. Measures shall also be established for the control of permanently installed instrument and control devices that are within the scope of this DQAP.

12.2. Organizational responsibilities shall be delineated for establishing, implementing, and assuring the effectiveness of the calibration program for M&TE. Reference standards used to determine the acceptability of items and activities, shall be of appropriate type, and maintained within prescribed accuracy limits, suitable range and accuracy in order to verify conformance to specified requirements.

12.3. The management position responsible for production is responsible for the governance of M&TE and oversight of the site calibration process for Davis-Besse. This includes the establishment of calibration practices, intervals, accuracy requirements, certification/de-certification, and equivalency decisions, as well as the resolution of technical issues regarding M&TE calibration. This management position is also responsible for governance and oversight of site M&TE Control. This includes assessment of site compliance to the control of M&TE as defined in corporate maintenance procedural guidance.

12.4. Procedures for the control and calibration of permanently installed plant equipment that are within the scope of this DQAP shall specify identification requirements (labeling, codes, or other documented control system), the recall process and calibration process and frequencies (including documented pre-calibration checks) of the M&TE to nationally recognized standards. Calibration methods are documented and performed by competent personnel in an environment that does not adversely affect the calibration. The calibration procedures shall specify recording of as-found conditions and a means for determining which equipment shall be included in the calibration program. M&TE used in the calibration of permanently installed plant equipment shall have ranges, precision, and accuracy equal to or greater than that to be calibrated and where this is impractical; the cognizant authority shall document rationale for accuracy.

12.5. The calibration procedures shall delineate special controls where applicable, for usage, handling, and storage required for environmental conditions such as temperature, humidity, cleanliness, or radiation in order to maintain accuracy and operating characteristics of the M&TE.

12.6. Calibration reference standards shall be based on nationally recognized standards or accepted values of natural physical constants. Where national standards do not exist, the basis for the calibration shall be documented. Special calibration and control measures are not required when normal commercial practices provide adequate accuracy (e.g. rulers, tape measures, levels, and other such devices).

12.7. M&TE which is found to be damaged, out-of-calibration or for which accuracy is suspect, shall be tagged and segregated and processed in accordance with approved procedures. When M&TE is found to be out-of-tolerance, an evaluation is made of its previous uses to determine corrective action.

13. HANDLING, STORAGE, AND SHIPPING

13.1. Measures shall be established to control the handling, storage, shipping, packaging, cleaning and preservation of items, material and equipment within the scope of this DQAP, in accordance with applicable design, work, and procurement requirements in order to prevent damage or deterioration during handling, packaging, preservation, storage, and shipping.

13.2. Special coverings, equipment and protective environments shall be specified and provided where necessary for the protection of items, material, and equipment from damage and deterioration. Special protective measures are specified and provided when required to maintain acceptable quality. When special protective features are required, their existence shall be verified and monitored as necessary to assure that the special protective features continue to serve their intended functions. Special handling tools and equipment shall be provided, where necessary, to ensure items, material and equipment can be handled safely and without damage.

13.3. Controls for hoisting, rigging, and transporting shall be established to protect SSCs within the scope of this DQAP as applicable. Markings or labeling shall be used to indicate the presence of special environments, or the need for special controls. Provisions shall be described for the storage of chemicals, reagents (including control of shelf life), lubricants and other combustible materials. Cleanliness controls shall be implemented to protect applicable SSCs from the introduction of foreign material and maintain system cleanliness as applicable throughout maintenance and modification activities.

14. INSPECTION, TEST, AND OPERATING STATUS

14.1. Measures shall be established for indicating the status of items within the scope of this DQAP undergoing inspections and tests to prevent the inadvertent bypassing or altering the sequence of such inspections or tests and avoid inadvertent operation. Where necessary to preclude inadvertent bypassing of inspections or tests, or to preclude inadvertent operation, these measures require the inspection, test, or operating status be verified before release, fabrication, receipt, installation, test or use. These measures also establish the necessary authorities and controls for the application and removal of status indicators or labels. The methods used to indicate inspection, test and operating status, including control of these indicators, are prescribed by approved procedures and shall be readily apparent and verifiable.

14.2. In addition, temporary design changes (temporary modifications), such as temporary bypass lines, electrical jumpers and lifted wires, and temporary trip-point settings, are controlled by procedures that include requirements for appropriate installation and removal, independent/concurrent verifications where necessary, and status tracking.

14.3. Deviations from the required sequence shall be subject to the same level of control as the generation of the original sequence to prevent the bypassing or omission of required test or inspection. The operating status of nonconforming, inoperable or malfunctioning SSCs shall be identified and documented to prevent inadvertent operation.

15. NONCONFORMING MATERIAL, PARTS, OR COMPONENTS

15.1. Measures shall be established for the identification, evaluation, segregation when practical, disposition of nonconforming items, and for notification to affected organizations. Items (including applicable services) that do not conform to specified requirements shall be controlled to prevent inadvertent installation or use.

15.2. Measures shall require that the individual (or designee), discovering a nonconformance, identify, describe, and document the nonconformance in accordance with the requirements of the corrective action program. Actions taken to address nonconforming items shall be documented. Controls are provided to address conditional release of nonconforming items for use on an at-risk basis prior to resolution and disposition of the nonconformance, including maintaining identification of the item and documenting the basis for such release. Conditional release of nonconforming items for installation requires the approval of designated management. Nonconformances are corrected or resolved prior to depending on the item to perform its intended important to safety function. Nonconformances to design requirements dispositioned as repair or use-as-is are subject to design control measures commensurate with those applied to the original design. Significant trends in nonconformances are reported to management in accordance with applicable procedures, regulatory requirements, and industry standards.

15.3. Nonconforming items that are being used for training must be controlled (e.g., administratively controlled, permanently identified, marked, have obliterated Material ID Tag or Q level indicators) to prevent inadvertent or inappropriate use of the item.

16. CORRECTIVE ACTION

16.1. Measures shall be established to promptly identify, control, document, classify, and correct conditions adverse to quality. 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. Procedures require personnel to identify known conditions adverse to quality. When a complex issue arises where it cannot be readily determined if a condition adverse to quality exists, measures shall be established for documentation and timely evaluation of the issue. Significant conditions adverse to quality are documented and reported to responsible management. In the case of a significant condition adverse to quality, the cause is determined and actions to preclude recurrence are taken and followed up on to verify implementation.

16.2. In the case of suppliers performing activities within the scope of this DQAP, or other similar situations, the applicable manager may delegate specific responsibilities for corrective actions but maintains responsibility for the effectiveness of corrective action measures.

17. QUALITY ASSURANCE RECORDS

17.1. Measures shall be established which define the requirements and responsibilities for identification, generation, collection, compilation, storage, maintenance, retention, and retrieval of records necessary to provide objective evidence that activities within the scope of this DQAP are in compliance with the regulations and facility implementing procedures.

17.2. Distribution of records shall be controlled in accordance with written procedures. Measures are established for replacement, restoration, or substitution of lost or damaged records. A system for receipt control of records is established. Receipt control is required for records transferred between Company locations, vendors and the Company, and from Company department files to final storage locations.

17.3. Records are legible, accurate, complete, identifiable, and retrievable. Records are considered valid and complete when dated and stamped, initialed, signed, or otherwise authenticated. Corrections, revisions, or supplements to completed records are reviewed and approved by an authorized individual in the originating organization. Such changes are dated and stamped, initialed, signed, or otherwise authenticated including the use of electronic approval and authorization as applicable.

17.4. Record storage facilities are established and maintained in a manner that minimizes the risk of damage or destruction. Records may be kept by suppliers and maintained on an available basis for a specified period of time. Records may be stored in electronic media provided that the process for managing and storing data is documented in procedures that comply with applicable regulations, including NRC guidance in RIS 2000-18 and as recognized in NIRMA (Nuclear Information Records Management Association) technical guides TG-11, TG-15, TG-16, and TG-21 as approved in NRC SERs.

17.5. Record retention periods are established to meet regulatory, Updated Final Safety Analysis Report (UFSAR)/DSAR, DQAP, and License requirements. The most stringent retention period is implemented when multiple requirements exist. Records are dispositioned at the end of the prescribed retention period.

18. AUDITS

18.1. Measures shall be established for a system of planned and documented audits in order to verify compliance with all aspects of the DQAP and determine the effective implementation of programs covered by the DQAP. Internal and supplier audits are conducted in accordance with written procedures or checklists. Audit personnel shall not have direct responsibilities in the areas to be audited.

18.2. The internal audit program is conducted on a performance driven frequency that is commensurate with the status and importance of the activity to be completed but does not exceed 24-months, unless otherwise required by regulation. Audits may be extended beyond their originally scheduled due date based on the following criteria:

A. Audits shall be performed at the intervals designated and the schedules are based on the month in which the audit starts.

B. A maximum extension not to exceed 25 percent of the audit interval is allowed unless restricted by regulation.

C. When an audit interval extension greater than one month is used, the next audit for that particular audit area is scheduled from the original anniversary month rather than from the month of the extended audit.

D. Item B applies to supplier audits and evaluations except that a total combined interval for any three (3) consecutive inspection or audit intervals does not exceed 3.25 times the specified inspection or audit interval.

18.3. Audit scheduling, preparation, personnel selection, personnel qualification, performance, reporting, response, follow-up, and records management for audits are performed in accordance with written procedures. Audit scopes and schedules are based upon the status of work progress, activities being performed, regulatory requirements, and/or experience with the organization being audited. An audit schedule shall be maintained, reviewed, and revised as necessary at least annually, to ensure that programs receive necessary audits to support regulatory compliance.

18.4. External audits of suppliers providing materials, parts, equipment orservices within the scope of this DQAP are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's Quality Assurance Program at a frequency of not more than three (3) years with an audit extension period identified in 18.2.D above.

18.5. Audit reports shall be prepared, reviewed, approved and distributed in accordance with approved procedures.

APPENDIX A

TERMS AND DEFINITIONS

A.1. DC Phase 1

- The period from Permanent Shutdown until permanent fuel removal

A.2. DC Phase 2

- The period from permanent fuel removal until end of the Zirconium (Zr) Fire Analysis (a.k.a. zirc-fire) period

A.3. DC Phase 3

- The period from the end of the Zr Fire Analysis period until fuel pool is empty (fuel is in the Independent Spent Fuel Storage Installation (ISFSI))

A.4. DC Phase 4

- The period from fuel in the ISFSI until all fuel removed from the ISFSI

A.5. DC Phase 5

- The period from all fuel removed from site until start of decontamination

A.6. DC Phase 6

- The period from start of decontamination until License termination

Note: Some decontamination of SSCs may occur in any DC Phase.

A.7. Important to safety (for this DQAP)

- SSCs whose functions are to protect spent fuel and/or the capability to prevent or mitigate the consequences of accidents that could result in potential for offsite exposure comparable to the guidelines in 10 CFR 50.34(a)(1), 10 CFR 50.67(b)(2) or 10 CFR 100.11, as applicable. These SSCs are typically listed in site specific DSARs or ISFSI design documents. Refer to NUREG/CR-6407, Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety, for application of this term to transportation packaging and dry fuel storage systems for compliance with 10 CFR 71 and 10 CFR 72.
- Safety Related - SSCs, which are considered important to safety because they perform safety actions, are required to avoid or mitigate the consequences of abnormal conditions or accidents. These SSCs are typically listed in site specific DSARs or ISFSI design documents.

A.8. For other terms and definitions refer to the applicable standard or regulatory guidance such as:

- ANSI N45.2.10 – 1973, Quality Assurance Terms and Definitions
- ASME NQA-1, 1994, Quality Assurance Requirements for Nuclear Facility Applications
- 10 CFR 50.2, Definitions
- 10 CFR 71.4, Definitions
- 10 CFR 72.3, Definitions
- NUREG-1536 Revision 1, Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility
- NUREG-1757 Vol.1, Rev.2, Consolidated Decommissioning Guidance

APPENDIX B

WRITING REFERENCE DOCUMENTS

B.1. Quality Standards and Regulatory Guidance

- Regulatory Guide 7.10, Establishing Quality Assurance Programs for Packaging Used in the Transportation of Radioactive Materials (Revision 2-March 2005).
- NUREG-1536 Revision 1, Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility, Section 14 Quality Assurance Evaluation.
- NUREG-1757 Vol.1, Rev.2, Consolidated Decommissioning Guidance, Section 17.6 Decommissioning Plan: Quality Assurance Program.

B.2. Safety Evaluation Reports

- Revision 1, U.S. NRC, Safety Evaluation by the Office of Nuclear Reactor Regulation quality assurance independent review program alternative, Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Plant, Palisades Nuclear Plant, Point Beach Nuclear Plant, Units 1 and 2, Docket No. 50-331, 50-305, 50-263, 50-255, 50-266, 50-301, 50-282, and 50-306, Dated January 13, 2005, ADAMS Accession No. ML050210276.
- U.S. NRC, Safety Evaluation by the Office of Nuclear Reactor Regulation related to revision 15 of the operational quality assurance manual, Entergy operations, Inc. Grand Gulf Nuclear Station, Unit 1, Docket No. 50-416, November 18, 1997.
- U.S. Nuclear Regulatory Commission, Safety Evaluation by the Office of Nuclear Reactor Regulation request for change to the operating quality assurance manual, revision 31, change notice 15-002, Union Electric Company, Callaway Plant, Unit 1, Docket No. 50-483, April 1, 2016, ADAMS Accession No. ML16089A167.
- U.S. NRC, Safety Evaluation by the Office of Nuclear Reactor Regulation proposed change to the Quality Assurance Program Common Safety Review Board Conduct of Operations Southern Nuclear Operating Company, Inc. for Joseph M. Farley Nuclear Plants, Units 1 and 2; Edwin I. Hatch Plant, Units 1 and 2; Vogtle Electric Generating Plant, Units 1 and 2, Docket Nos. 50-348, 50-364, 50-321, 50-366, 50-424, and 50-425. June 17, 2005, ADAMS Accession No. ML051570349.
- U.S. NRC, Safety Evaluation by the Office of Nuclear Reactor Regulation Decommissioning Quality Assurance Program changes San Onofre Nuclear Generating Station, Units 1, 2, and 3 and the Independent Spent Fuel Storage Installation, Docket Nos. 50-206, 50-361, 50-362, and 72-041 Common Safety Review Board Conduct of Operations. July 23, 2015, ADAMS Accession No. ML15191A461.

- U.S. NRC, Safety Evaluation by the Office of Nuclear Reactor Regulation, Decommissioning Quality Assurance Program, Revision 0, Exelon Generating Company, LLC, Oyster Creek Nuclear Generating Station and Independent Spent Fuel Storage Installation, Docket Nos. 50-219 and 72-15, June 27, 2018, ADAMS Accession No. ML18165A136.
- U.S. NRC, Safety Evaluation of the Nuclear Operations, Inc, Vermont Yankee Nuclear Power Station, Quality Assurance Program Manual, Revision 7, May 1, 2018, ADAMS Accession No. ML18099A166.

APPENDIX C

REGULATORY COMMITMENTS

C.1. 10 CFR 50 Appendix B, *Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants*

C.2. 10 CFR 71 Subpart H, *Quality Assurance*

C.3. 10 CFR 72, Subpart G, *Quality Assurance*

C.4. NUREG/CR-6407, *Classification of Transportation Packaging and Dry Fuel Storage System Components According to Important to* Safety *(2/1996)*

APPENDIX D

GENERAL ADMINISTRATIVE REQUIREMENTS

D.1. Fire Protection

10 CFR 50.48(f) requires that licensees that have submitted the certification required under 50.82(a)(1) shall maintain a fire protection program to address the potential for fires that could cause the release or spread of radioactive materials. The quality assurance program established for these fire protection SSCs ensures that design, procurement, instruction, procedures, drawings, inspection, installation, testing, maintenance, operations, nonconforming Items, corrective action, records, audits and administrative controls meet the applicable quality assurance guidelines as described in Appendix A to BTP APCSB 9.5-1 during decommissioning and permanent shutdown. Engineering determines what fire protection SSCs are required to prevent fires, rapidly detect, control, and extinguish fires that do occur and could result in a radiological hazard and, minimize the risk the public, environment, and plant personnel resulting from fires that could result in a release of radioactive materials. Engineering also establishes the requirements for the design, procurement, fabrication, installation and/or modification of these fire protection SSCs. All other fire protection equipment and supplies will be of commercial quality, in accordance with National Fire Protection Association (NFPA) guidelines.

D.2. Transport of Radioactive Waste

D.2.1 When the Company contracts with vendors to transport radioactive waste in NRC approved shipping packages, it meets the requirements of 10 CFR 71, Subpart H. The Company assures that this service is procured from an organization with a QA program and if applicable, includes a NRC licensed transport system. Loading, surveying, closure, placarding, and inspections are conducted in accordance with written procedures and instructions. Transport casks and trailers are inspected before release in accordance with Department of Transportation (DOT) 49 CFR. Shipping manifests, including final radiation surveys, are completed and retained. Radioactive waste shipments not meeting the requirements for NRC approved packaging, shall meet the requirements of DOT 49 CFR.

D.3. Services

D.3.1. The Company procures services from qualified suppliers. It is not necessary that these suppliers have a quality assurance program approved by the licensee, however, suppliers should provide a quality assurance program that includes the quality assurance program elements presented in Regulatory Guide 4.15, Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment, and routinely provide program data summaries sufficiently detailed to permit evaluation of the program for the following areas:

- Meteorology.
- Offsite Dose Calculation Manual.
- Radiological environmental monitoring.

D.4. License Renewal

D.4.1. Consistent with the requirements of 10 CFR 54.21(a)(3), the Company implements the requirements of DQAP Section 1 through 18 for aging management activities related to safety related SSCs as described by licensing documents for those systems that remain active.

D.4.2. Additionally, to manage the aging effects of non-safety related SSCs that were determined to be within the scope of License Renewal, the Company implements the administrative controls, corrective actions and confirmation processes described in DQAP Sections 6 and 16 for those systems that remain active.

D.5. Safety Review Committee

D.5.1. The Safety Review Committee (SRC) serves the CNO as an on-site review body that performs procedure and program reviews for decommissioning activities and ISFSI operation as necessary on matters of Nuclear Safety. Details regarding the membership, quorum, agenda, and meeting schedule are contained in implementing procedures.

APPENDIX E

DAVIS-BESSE SITE SPECIFIC ADMINISTATIVE REQUIREMENTS

E.1. Regulatory Guide 1.33

E.1.1. Written procedures applicable to safe storage of nuclear fuel recommended in Appendix A of Regulatory Guide 1.33, shall be established, implemented, and maintained. (ref. Davis-Besse Technical Specification Section 5.4, Procedures)

E.2. Independent Spent Fuel Storage Installation (ISFSI) SSC

E.2.2. ISFSI quality assurance program requirements are performed in accordance with the applicable 10 CFR 72.212 report which invokes the portions of the NRC approved 10 CFR 50 Appendix B quality assurance program as described in this DQAP, commensurate with the safety classification of the component and quality requirements specified in the cask vendor Final Safety Analysis Report (FSAR) or site-specific license.

E.3. Records Retention

E.3.1 The following records shall be retained for at least five years:

- Records and logs of activities related to the safe storage of irradiated fuel.
- Records and logs of principle maintenance activities, inspections, repair and replacement of principal items of equipment related to safe storage of irradiated fuel.
- All Licensee Event Reports.
- Records of surveillance activities, inspections and calibrations required by technical specifications.
- Records of changes made to the procedures required by technical specification.
- Records of sealed source leak tests and results.
- Records of annual physical inventory of all source material of record.

E.3.2 The following records shall be retained for the duration of the Facility License:

- Records and drawing changes reflecting facility design modification made to systems and equipment needed for the safe storage of irradiated fuel as described in the Updated Final Safety Analysis Report.
- Records of irradiated fuel inventory, fuel transfers and assembly burnup histories.
- Records of facility radiation and contamination surveys.
- Records of doses received by all individuals for whom monitoring was required.
- Records of gaseous and liquid radiative material released to the environs.
- Records of training and qualification for current members of the facility staff.
- Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- Records of results of analyses required by the Radiological Environmental Monitoring Program.
- Records of reviews performed for changes made to the Offsite Dose Calculation Manual and Process Control Plan.
- Records of radioactive shipments.