ATTACHMENT 5

OPERATIONAL QUALITY
ASSURANCE PROGRAM

DRY SPENT FUEL STORAGE CASK

VIRGINIA POWER

OPERATIONAL QUALITY ASSURANCE PROGRAM

Virginia Power has elected to implement the requirements of their "Operational Quality Assurance Program - Topical Repon VEP-1 (Updated)" on this project as specified in the following documents in lieu of the GNSI Topical Report 29004-001:

1. Surry Dry Cask ISFSI Safety Analysis Report, Section 11

   "As described in the Virginia Power NODS, Virginia Power has the ultimate responsibility for ensuring that the manufacture of safety-related components is done in accordance with the NODS. In accordance with the NODS, the cask manufacturers must do their work under approved QA plans. The GNSI QA plans are described in Chapter 11 of the GNSI Topical Report (1)."

   (1) "Topical Safety Analysis Report for the CASTOR V/21 Cask Independent Spent Fuel Storage Installation (Dry Storage), GNSI, January 1985."

2. Surry Dry Cask ISFSI Safety Evaluation Report, Section 4.0

   "The staff finds that the requirements for Quality Assurance (10 CFR 72.80) will be met when the existing QA program is applied, as has been committed to by the applicant, to the procurement and handling of the GNSI CASTOR V/21 cask..."

3. Virginia Power Specification for Dry Spent Fuel Storage Casks for Surry Power Station Units 1 and 2, NUS-2001 Section 1.4.11.

4. GNSI Safety Evaluation Report - Section 14.

   "Chapter 11, 'Quality Assurance,' of the TSAR referenced Appendix 7, 'Quality Assurance Handbook for Dry Spent Fuel Storage Cask (QAH),' Revision 1 of the QAH (docketed July 25, 1984). However, the QAH has been superceded by submittal by General Nuclear Systems, Inc., (not the applicant) of the 'Quality Assurance Plan for the CASTOR Dry Spent Fuel Storage/Transport Cask' (docketed March 5, 1985, under Project Nos. M-34 and M-37 and 71-0510), which includes Revision 2 of the QAH and which responds to NRC staff comments sent to Gesellschaft für Nuklear-Service mbH (formerly the applicant) by letter dated November 13, 1984 for Revision 1 of the QAH.

   The quality assurance program established by General Nuclear Systems, Inc., which is based on the criteria of Appendix B to 10 CFR 50 and which references ANS/ASME NQA-1-1979, 'Quality Assurance Program

Requirements for Nuclear Power Plants,' is acceptable for referencing without further review in a license application to receive and store spent fuel under 10 CFR Part 71, provided that the license applicant has an NRC approved Quality Assurance Program which meets the requirements of Appendix B to 10 CFR Part 50 and which is applied to this activity."

This position is based upon the review of the various commitments made in our controlling regulatory documents as well as our procurement documents since the start of the project. Our Topical Report addresses the applicable criteria of 10 CFR 50, Appendix B, as approved by the NRC on an annual basis.