



HITACHI

GE Hitachi Nuclear Energy

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M200169

Project Number: 710

December 23, 2020

ATTN: Document Control Desk
Director, Division of Reactor Oversight
Office of Nuclear Reactor Regulation
Director, Division of Fuel Management
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Accepted Version of NEDO-11209 Revision 16, "GE Hitachi Nuclear Energy Quality Assurance Program Description"

By Reference 1, the NRC issued the final Safety Evaluation (SE) for the amendment to GE Hitachi Nuclear Energy (GEH) Quality Assurance Topical Report (TR) NEDO-11209 Revision 16, "GE Hitachi Nuclear Energy Quality Assurance Program Description." The NRC requested in Reference 1 that GEH publish the accepted version of the TR incorporating the Safety Evaluation. As requested, enclosed is the accepted (-A) version of the subject TR.

If you have any questions, please contact Mark Gerdes (mark.gerdes@ge.com; 910-232-1409).

Sincerely,

Mark L. Gerdes

Senior Business Process Manager
Quality Programs and ASME Program Leader
GE-Hitachi Nuclear Energy Americas LLC

Reference:

1. Dennis C. Morey (USNRC) to Michelle Catts (GEH) on December 17, 2020, "Final Safety Evaluation for GE-Hitachi Nuclear Energy Proposed Revision 16 to Topical Report, NEDO-11209A "Quality Assurance Program Description (QAPD)," (EPID L-2020-TOP-0042)"

Enclosures:

1. NEDO-11209-A, Revision 16 - Non-Proprietary Information

cc:

N. Otto, NRC, NRR/DORL/LLPB
D. Morey, NRC, Chief NRR/DORL/LLPB
K. Kavanagh, NRC, Chief NRR/DRO/IQVB
C. Miller, NRC, Director NRR/DRO
A. Kock, NRC, Director NMSS/DFM
J. McKirgan, NRC, Chief NMSS/DFM/STLB
M. Catts, GEH Wilmington
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S. Griffin, GEH Wilmington
M. Gerdes, GEH Wilmington
PLM Specification 001N8521, R14



HITACHI

GE Hitachi Nuclear Energy

GE Hitachi Nuclear Energy Americas LLC
3901 Castle Hayne Road
Wilmington, North Carolina 28401

NEDO-11209-A
REVISION 16
December 2020

Non-Proprietary Information

Quality Assurance Topical Report

GE Hitachi Nuclear Energy
Quality Assurance Program Description

PREPARED BY:

MARK GERDES, QUALITY PROGRAMS LEADER

REVIEWED BY:

MICHELLE CATTS, QUALITY SENIOR VICE PRESIDENT

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 17, 2020

Ms. Michelle P. Catts
Senior Vice President, Regulatory Affairs
GE-Hitachi Nuclear Energy Americas, LLC
P.O. Box 780 M/C A-10
Wilmington, NC 28401

SUBJECT: FINAL SAFETY EVALUATION FOR GE-HITACHI NUCLEAR ENERGY,
PROPOSED REVISION 16 TO TOPICAL REPORT, NEDO-11209A,
REVISION 15, "GE-HITACHI NUCLEAR ENERGY QUALITY ASSURANCE
PROGRAM DESCRIPTION" (EPID L-2020-TOP-0042)

Dear Ms. Catts:

By letter dated July 29, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20211L779), GE Hitachi Nuclear Energy (GEH) submitted for the U.S. Nuclear Regulatory Commission (NRC) staff's review and approval, proposed Revision 16 to Topical Report (TR), NEDO-11209A Revision 15, "GE-Hitachi Nuclear Energy Quality Assurance Program Description," in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50.4(b)(7), "Quality Assurance Related Submissions," (ii).

By letter dated December 1, 2020 (ADAMS Package Accession No. ML20329A006), an NRC staff draft safety evaluation (SE) regarding our approval of Revision 16 to TR, NEDO-11209A Revision 15, was provided for your review and comment. In letter dated December 13, 2020 (ADAMS Accession No. ML20350B364, from Mark Gerdes, stated in part that GEH has reviewed the draft SE and accepts the SE as written without necessity for changes or additional information.

The NRC staff has found that TR, NEDO-11209A, Revision 16 is acceptable for referencing in licensing applications for nuclear power plants to the extent specified and under the limitations delineated in the TR and in the enclosed final SE. The final SE defines the basis for our acceptance of the TR.

Our acceptance applies only to material provided in the subject TR. We do not intend to repeat our review of the acceptable material described in the TR. When the TR appears as a reference in licensing applications, our review will ensure that the material presented applies to the specific plant involved. License amendment requests that deviate from this TR will be subject to a plant specific review in accordance with applicable review standards.

M. Catts

In accordance with the guidance provided on the NRC website, we request that GEH publish approved version of TR, NEDO-11209A Revision 16, "GE-Hitachi Nuclear Energy Quality Assurance Program Description," within three months of receipt of this letter. The approved version shall incorporate this letter and the enclosed final SE after the title page. The approved version shall include a "A" (designating approved) following the TR identification symbol.

If future changes to the NRC's regulatory requirements affect the acceptability of this TR, GEH will be expected to revise the TR appropriately or justify its continued applicability for subsequent referencing. Licensees referencing this TR would be expected to justify its continued applicability or evaluate their plant using the revised TR.

Sincerely,

/RA/

Dennis C. Morey, Chief
Licensing Projects Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 99901376

Project No. 712

Enclosure: Final SE (Non-Proprietary)

cc w/o encl.: See next page

M. Catts

- 3 -

SUBJECT: FINAL SAFETY EVALUATION FOR GE-HITACHI NUCLEAR ENERGY,
PROPOSED REVISION 16 TO TOPICAL REPORT, NEDO-11209A,
REVISION 15, "GE-HITACHI NUCLEAR ENERGY QUALITY ASSURANCE
PROGRAM DESCRIPTION" (EPID L-2020-TOP-0042)
DATED: DECEMBER 17, 2020

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EXTERNAL DISTRIBUTION:

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ADAMS Accession Nos.:

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ML20350B365 (Letter)

ML20350B363 (Final SE)

***concurrence via email**

NRR-106

| OFFICE | NRR/DORL/LLPB* | NRR/DORL/LLPB* | NRR/DRO/IQVB* | NRR/DORL/LLPB* |
|--------|----------------|----------------|---------------|----------------|
| NAME | NOtto | DHarrison | KKavanagh | DMorey |
| DATE | 12/14/2020 | 12/16/2020 | 12/17/2020 | 12/17/2020 |

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OFFICE OF NUCLEAR REACTOR REGULATION

FINAL SAFETY EVALUATION FOR GE HITACHI NUCLEAR ENERGY

PROPOSED REVISION 16 TO TOPICAL REPORT, NEDO-11209A, REVISION 15

“GE HITACHI NUCLEAR ENERGY QUALITY ASSURANCE PROGRAM DESCRIPTION”

(EPID: L-2020-TOP-0042)

1.0 INTRODUCTION

By letter dated July 29, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20211L779), GE Hitachi Nuclear Energy (GEH) submitted for the U.S. Nuclear Regulatory Commission (NRC) staff’s review and approval the proposed Revision 16 to NEDO-11209A Revision 15, “GE Hitachi Nuclear Energy Quality Assurance Program Description,” in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) paragraph 50.4(b)(7)(ii). GEH is also a 10 CFR Part 71, “Packaging and Transportation of Radioactive Material,” licensee holder and utilizes the same quality assurance (QA) program description (QAPD) to meet the requirements of 10 CFR Part 71. The GEH QAPD provides an overview of the program controls applied to quality related items and activities at GEH. GEH proposed that Revision 16 would replace the current Revision 15 QAPD, in its entirety. The changes included in Revision 16 include updating the QAPD to be based on American Society of Mechanical Engineers (ASME) Nuclear Quality Assurance (NQA)-1-2015, “Quality Assurance Requirements for Nuclear Facility Application,” dated February 20, 2015, updated to reflect new organization structure, updates to more recent documents, and editorial and clarification changes.

2.0 REGULATORY EVALUATION

The Commission’s regulatory requirements related to QA programs for non-licensees are set forth in 10 CFR 50.4(b)(7)(ii). This regulation requires that a change to an NRC-accepted QAPD from non-licensees (i.e., architect/engineers, nuclear steam system suppliers, fuel suppliers, constructors, etc.) must be submitted to the NRC. The NRC will review the proposed QAPD for acceptability to ensure the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied.

Appendix B, “Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,” to 10 CFR Part 50 establishes QA requirements for the design, fabrication, construction, and testing of structures, systems, and components (SSCs) of the facility. The pertinent requirements of Appendix B to 10 CFR Part 50 apply to all activities affecting the safety-related functions of SSCs and include designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modifying.

3.0 TECHNICAL EVALUATION

NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Section 17.5, "Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants," Revision 1, dated August 2015 (ADAMS Accession No. ML15037A441), which provides acceptance criteria for QAPDs. SRP Section 17.5 is based on ASME Standard NQA-1-2008 Edition and the NQA-1a-2009 Addenda, as supplemented by additional regulatory and industry guidance for nuclear operating facilities. In addition, the NRC staff used Regulatory Guide (RG) 1.28, "Quality Assurance Program Criteria (Design and Construction)," Revision 5, dated October 2017, endorses the use of NQA-1-2015 with exceptions and clarifications, within. The GEH QAPD, Revision 16, is based on NQA-1-2015 and the exceptions and clarifications noted in RG 1.28, Revision 5.

The format used for the NRC staff's evaluation followed the sequence of the 18 criteria of Appendix B and corresponding provisions of NQA-1-2015. The QAPD provides guidance for establishing a top-level policy document that defines the quality requirements and assigns major functional responsibilities. The GEH QAPD applies to work involving SSCs for nuclear power plants and fuel reprocessing plants that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. In Part I, "Introduction," GE Reuter Stokes was removed from the list of companies affiliated and applicable to the GEH QAPD.

3.1 Organization

In Part II, "QAPD Details," Section 1.0, "Organization," GEH made changes to personnel and organizational titles and reporting structure. In Section 1.10, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion I, "Organization," and NQA-1-2015 Edition, Requirement 1.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 1.0 and concluded that the organizational changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion I, "Organization."

3.2 Quality Assurance Program

In Part II, Section 2.0, "Quality Assurance Program," GEH made minor changes to the discussion on review and approval of subsequent issues. In Section 2.9, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion II, "Quality Assurance Program," and NQA-1-2015 Edition, Requirement 2.

The NRC staff reviewed Section 2.0 of the GEH QAPD, and the measures documented and its commitment. The NRC staff finds the changes to the QAPD continue to meet the guidance in SRP Section 17.5 and the requirements in Appendix B to 10 CFR Part 50, Criterion II, "Quality Assurance Program."

3.3 Design Control

In Part II, Section 3.0, "Design Control," GEH made changes to add clarity and remove duplication of information. In Section 3.10, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion III, "Design Control," and NQA-1-2015 Edition, Requirement 3. In addition, GEH commits to compliance with NQA-1-2015, Subpart 2.7 for establishing requirements for computer program design control.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 3.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion III, "Design Control."

3.4 Procurement Document Control

In Part II, Section 4.0, "Procurement Document Control," GEH added controls for software errors in procurement documents. In Section 4.5, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion IV, "Procurement Document Control," and NQA-1-2015 Edition, Requirement 4.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 4.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion IV, "Procurement Document Control."

3.5 Instructions, Procedures, and Drawings

In Part II, Section 5.0, "Instructions, Procedures, and Drawings," GEH made no modifications to this section except to update its commitment. In Section 5.4, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion V, "Instructions, Procedures, and Drawings," and NQA-1-2015 Edition, Requirement 5.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 5.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion V, "Instructions, Procedures, and Drawings."

3.6 Document Control

In Part II, Section 6.0, "Document Control," GEH made no modifications to this section except to update its commitment to reflect the use of NQA-1-2015 Edition. In Section 6.5, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion IV, "Document Control," and NQA-1-2015 Edition, Requirement 6.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 6.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion VI, "Document Control."

3.7 Control of Purchased Material, Equipment, and Services

In Part II, Section 7.0, "Control of Purchased Material, Equipment, and Services," GEH changed the title of Source Acceptance to Source Verification. In Section 4.5, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion VII, "Control of Purchase

Material, Equipment, and Services,” and NQA-1-2015 Edition, Requirement 7. In addition, GEH added requirement for the calibration or a test laboratory to be accredited to ISO/IEC 17025:2017 or 2005.

The NRC staff notes that the proposed GEH QAPD has already been approved to use the Nuclear Energy Institute (NEI) Technical Report NEI 14-05A, Revision 1, “Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services,” dated August 2014 (ADAMS Accession No. ML14245A391), in NRC staff safety evaluation for GEH QAPD, Revision 12, dated June 6, 2016 (ADAMS Accession No. ML161138A359).

The NRC staff is currently completing its review of Revision 1 to NEI 14-05A submitted to the NRC by NEI on February 20, 2020 (ADAMS Accession No. ML20054C066). The revision provides clarification guidance for the use of the International Laboratory Accreditation Cooperation process and the use of the 2017 edition of ISO/IEC 17025.

It is expected that when the NRC approval is completed, GEH will incorporate all limitations and conditions documented in the revision to NEI-14-05 and the associated NRC staff’s safety evaluation.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 7.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion VII, “Control of Purchased Material, Equipment, and Services.”

3.8 Identification and Control of Materials, Parts, and Components

In Part II, Section 8.0, “Identification and Control of Materials, Parts, and Components,” GEH made no modifications to this section except to update its commitment. In Section 8.6, “Commitment,” GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion VIII, and NQA-1-2015 Edition, Requirement 8.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 8.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion VIII, “Identification and Control of Materials, Parts, and Components.”

3.9 Control of Special Processes

In Part II, Section 9.0, “Control of Special Processes,” GEH made no modifications to this section except to update its commitment to reflect the use of NQA-1-2015 Edition. In Section 9.6, “Commitment,” GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion IX, and NQA-1-2015 Edition, Requirement 9.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 9.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion IX, “Control of Special Processes.”

3.10 Inspection

In Part II, Section 10.0, "Inspection" GEH made no modifications to this section except to update its commitment to reflect the use of NQA-1-2015 Edition. In Section 10.6, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion X, "Inspection," and NQA-1-2015 Edition, Requirement 10.

The NRC staff reviewed the changes to the QA measures to be implemented by GEH in QAPD Section 10.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion X, "Inspection."

3.11 Test Control

In Part II, Section 11.0, "Test Control," GEH made modifications and reorganized statements related to software testing based on the commitment to NQA-1-2015 Subpart 2.7. In Section 11.6, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XI, "Test Control," and NQA-1-2015 Edition, Requirement 11. In addition, GEH added "In establishing requirements for computer program test procedures and test records, GEH commits to compliance with NQA-1-2015, Subpart 2.7."

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 11.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion XI, "Test Control."

3.12 Control of Measuring and Test Equipment

In Part II, Section 12.0, "Control of Measuring and Test Equipment," GEH made no modifications to this section except to update its commitment to reflect the use of NQA-1-2015 Edition. In Section 12.6, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XII, "Control of Measuring and Test Equipment," and NQA-1-2015 Edition, Requirement 12.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 12.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion XII, "Control of Measuring and Test Equipment."

3.13 Handling, Storage, and Shipping

In Part II, Section 13.0, "Handling, Storage, and Shipping," GEH made no modifications to this section except to update its commitment to reflect the use of NQA-1-2015 Edition. In Section 13.6, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XIII, "Handling, Storage, and Shipping," and NQA-1-2015 Edition, Requirement 13.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 13.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion XIII, "Handling Storage, and Shipping."

3.14 Inspection, Test, and Operating Status

In Part II, Section 14.0, "Inspection, Test, and Operating Status," GEH made no modifications to this section except to update its commitment to reflect the use of NQA-1-2015 Edition. In Section 14.3, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XIV, "Inspection, Test and Operating Status," and NQA-1-2015 Edition, Requirement 14.

The NRC staff reviewed the changes to the QA measures to be implemented by GEH in QAPD Section 14.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion XIV, "Inspection, Test, and Operating Status."

3.15 Nonconforming Material or Components

In Part II, Section 15.0, "Nonconforming Material or Components," GEH made no modifications to this section except to update its commitment to reflect the use of NQA-1-2015 Edition. In Section 15.5, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XV, "Nonconforming, Material or Components," and NQA-1-2015 Edition, Requirement 15.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 15.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion XV, "Nonconforming Material or Components."

3.16 Corrective Action Program

In Part II, Section 16.0, "Corrective Action," GEH made a minor grammatical change to this section and updated its commitment to reflect the use of NQA-1-2015 Edition. In Section 16.5, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XVI, "Corrective Action," and NQA-1-2015 Edition, Requirement 16.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 16.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion XVI, "Corrective Action."

3.17 Quality Assurance Records

In Part II, Section 17.0, "Quality Assurance Records," GEH made modifications to Section 17.7.4 related to indexing information necessary to retrieve the record to this section and updated its commitment to reflect the use of NQA-1-2015 Edition. In Section 17.8, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XVII, "Quality Assurance Records," and NQA-1-2015 Edition, Requirement 17, and RG 1.28, Revision 5.

The NRC staff reviewed the changes to the QA measures to be implemented by GEH in QAPD Section 17.0 and concluded that the changes in the QAPD continue to meet the guidance in

SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion XVII, "Quality Assurance Records."

3.18 Audits

In Part II, Section 18.0, "Audits," GEH made modifications to this section to reflect the changes in NQA-1-2015 and the regulatory positions in RG 1.28, Revision 5. In addition, GEH made changes to update its commitment to reflect the use of NQA-1-2015 Edition. In Section 18.7, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XVIII, and NQA-1-2015 Edition, Requirement 18 and RG 1.28, Revision 5.

The current revision QAPD, Revision 15 requires the following for internal audits:

Internal audits of organizations and activities are conducted prior to placing a facility in operation and at least once a year subsequently. Once Activities have been established, internal audits are conducted to ensure all GEH Quality Assurance (QA) program elements are evaluated for each functional area within a period of two years. Activities with durations of less than one year are audited at least once during the life of the activity.

The proposed change in GEH QAPD, Revision 16 requires the following for internal audits:

Prior to placing a licensed facility into operation – All applicable QA program elements are audited at least once each year or at least once during the life of the activity, whichever is shorter.

After placing a licensed facility into operation – All applicable QA program elements for each functional area shall be audited within a period of two years. For well-established activities, the period may be extended one year at a time beyond the two-year interval based on the results of an annual evaluation of the applicable functional area and objective evidence that the functional area activities are being satisfactorily accomplished. However, the internal audit interval shall not exceed a maximum of four years.

Activities not related to a licensed facility or other support activities – All applicable QA program elements shall be audited at least once each year or at least once during the life of the activity, whichever is shorter. This interval may be extended up to two years based on the results of an annual evaluation and objective evidence that the activities are being satisfactorily accomplished in accordance with the applicable QA program elements.

The NRC staff reviewed the changes related to internal audits. Based on GEH's experience in the nuclear industry, the NRC staff finds GEH has a well-established audit program. The NRC staff determined the GEH's proposed changes in internal audit frequency for internal audits is in alignment with current NRC staff guidance and is therefore acceptable.

The NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 18.0 and concluded that the changes in the QAPD continue to meet the guidance in SRP Section 17.5, and Appendix B to 10 CFR Part 50, Criterion XVIII, "Audits."

4.0 CONCLUSION

The NRC staff used the acceptance criteria in NUREG-0800, Section 17.5, as the basis for evaluating the acceptability of the changes to the GEH QAPD, Revision 16, in conformance with the applicable portions of 10 CFR Part 71, and Appendix B to 10 CFR Part 50. The NRC staff concludes that GEH QAPD, NEDO-11209, Revision 16, follows the NRC guidance contained within and conforms to the format of NUREG-0800, Section 17.5, complies with Appendix B to 10 CFR Part 50 requirements for the QA program and, therefore, is acceptable.

5.0 REFERENCES

1. Safety Evaluation of GEH Quality Assurance Topical Report, NEDO-11209, Revision 12, Quality Assurance Program Description, dated June 6, 2016 (ADAMS Accession No. ML16138A359).
2. Final Safety Evaluation of NEI 14-05, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services, Revision 1," dated February 9, 2015 (ADAMS Accession No. ML14322A535).
3. NEI submittal Revision 1 to Technical Report NEI 14-05A, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," dated February 20, 2020 (ADAMS Accession No. ML20054C066).
4. Safety Evaluation of GEH Quality Assurance Topical Report, NEDO-11209, Revision 15, Quality Assurance Program Description, dated May 20, 2020 (ADAMS Accession No. ML20140A322).
5. Regulatory Guide 1.28, "Quality Assurance Program Criteria (Design and Construction)," dated October 27, 2020 (ADAMS Accession No. ML17207A293).
6. NUREG-0800, Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition, Section 17.5 Revision 1, "Quality Assurance Program Description – Design Certification, Early Site Permit and New License Applicants," August 2015 (ADAMS Accession No. ML15037A441).
7. American Society of Mechanical Engineers (ASME) NQA-1-2015, "Quality Assurance Requirements for Nuclear Facility Applications," dated February 20, 2015.

Principal Contributor: A. Keim

Date: December 17, 2020



GEH Quality Assurance Program Description

REVISION HISTORY

| Revision | Description | | | Date | Author |
|--|----------------------|--|--|----------|-------------|
| 9 | Complete re-write | | | 06/28/10 | E.L. Jordan |
| Incorporation of NRC RAI responses and editorial changes | <u>Page</u> | <u>Section</u> | <u>Change</u> | 12/09/10 | E.L. Jordan |
| | i | Title Page | Reformatted | | |
| | 1 - 8 | 1 | re-written (RAI 1 to 4) | | |
| | 9 | 2.1 | Spelling | | |
| | 14 | 3.4 | reworded (RAI 7) | | |
| | 18 | 3.6 | Detail added (RAI 8) | | |
| | 29 | 7.8 | Spelling | | |
| | 43 | 13.3 | Detail added (RAI 9) | | |
| Created Approved Final Version | <u>Page</u> | <u>Section</u> | <u>Change</u> | 08/08/11 | E.L. Jordan |
| | All | All | Added "-A"; "August 2011" | | |
| | Mult. | All | NQA-1-2008 added to commitment statements of each sec. | | |
| | iv - vii | TOC | Updated | | |
| | NA | | Inserted NRC Letter | | |
| 10 | <u>Page</u> | <u>Section</u> | <u>Change</u> | 12/20/12 | M. Gerdes |
| | All | All | General format changes to acronym references and text per writers guide and bulleted lists | | |
| | iv, v, vi, vii, viii | TOC | Updated | | |
| | 1 | 1.1 | Updated acronyms and abbreviations | | |
| | 1 | 1.2.1, 1.2.1.1, 1.2.1.2, 1.2.1.3 | Clarified QAPD adherents and removed org. elements table | | |
| | 3 & 4 | 1.2.2.3 | Updated to reflect current organizational structure | | |
| | | | Removed NQA & Support Services titles, which are now included in Quality Programs, combined P&L and Support Quality Leaders to "Org. Specific Quality Leaders", added Continuous Improvement | | |
| | 4 | 1.4 | Removed NQA title and added QA organization | | |
| | 6 | Fig. 1 | Replaced figure with new reflecting current organizational structure | | |
| | 7 | Fig. 2 | Replaced table with new reflecting current organizational structure | | |
| | 22 | 6.4 | Clarified to current process for all temporary changes. | | |
| 24 | 7.5 | Clarified to remove conditionality of nonconformance reporting | | | |
| 28 | 7.10 | Eliminated 1 st bullet exception to Requirement 7 | | | |



GEH Quality Assurance Program Description

| Revision | Description | | Date | Author | |
|----------|------------------------------------|--|--|-----------|-----------|
| | 33 | 10.2 | Clarified to include how activities are defined | | |
| | 42 & 43 | 15.3 | Eliminated 2 nd sentence in Rework and Repair definition to align with current procedure requirements | | |
| | 50 | 18.4 | Updated to reflect current organization responsible for Internal Audits | | |
| 10 | Page All | Section All | Change Admin change to include "-A" on all page headers | 1/21/2013 | M. Gerdes |
| | 7 | Fig. 2 | Admin change to correct spelling of New Plant Projects | | |
| 11 | Page All Multiple Multiple | Section All All Multiple | Change Reformatted text and sections Updated for organization changes Incorporated portions of NEDO-32280, "GEH ISO-9001 Quality Management System" into NEDO-11209 | 3/13/2014 | R. Augi |
| | Multiple All | Multiple All | Clarified NQA-1 commitments Formatted overall structure of the QAPD to align with NEI-06-14 | | |
| | 6 | Policy Statement | Added Policy Statement | | |
| | 9 | Scope /Applicability | Moved Introduction to this section, Scope rewritten | | |
| | 16 | 1.7.1 | Added "Delegation Inside the GEH Organization" | | |
| | 18 | Figure 2 | Deleted | | |
| | 21 | 2.8 | Added "Quality Assurance Program Description Management" section | | |
| | 39 | 7.10 | Added Perry Johnson to list of accredited calibration bodies | | |
| | 51 | 12.5.3 | Added "Out of Calibration" section | | |
| | 57 | 16.1, 16.3, 16.4 | Added Corrective Action Program details | | |
| | 65 | 18.3.3 | Added "Audit Performance" section | | |
| | 67 | Part III | Added "Supplemental Details" | | |
| | 74 | Part IV | Moved "Regulatory Commitments" from Appendix A | | |
| 12 | Page 21 | Section 2.8 | Change Revised Quality Assurance Program Description Management Section 2.8 | 2/11/2015 | R. Augi |
| | 29 | 3.10 | Added Subpart 2.7 to Section 3.10 & 11.6 | | |
| | 49 | 11.6 | Commitments | | |
| | 77 | Appendix A | Added a new Appendix A for GEH Responses to NRC RAIs | | |
| | All | All | Added "-A" to NEDO-11209 | | |
| 13 | Amendment 1 to Revision 12: | | | | |
| | Submittal: | MFN 15-091, "Amendment to NEDO-11209-A Revision 12, "GE Hitachi Nuclear Energy Quality Assurance Program Description," October 14, 2015. | | | |
| | Approval: | MFN 16-040, "Final Safety Evaluation for General Electric Hitachi Nuclear Energy Americas, LLC Amendment to NEDO-11209-A Revision 12, "GE Hitachi Nuclear Energy Quality Assurance Program Description," June 6, 2016. | | | |



GEH Quality Assurance Program Description

| Revision | Description | | | Date | Author |
|----------|-------------------|------------------------------------|--|-----------|---------|
| | <u>Page</u> 8 | <u>Section</u> Policy Statement | <u>Change</u> Added "the safety of its employees and the public above all other demands" to the first sentence and changed the GEH President and CEO from Caroline Reda to Jay Wileman. | 8/04/2016 | R. Augi |
| | 10 | Acronyms & Abbreviations | Removed A2LA, ANS, GSC, IAS, LAS, MRA, NVLAP, PJLA | | |
| | 11 | 1.0 | Added "10 CFR Part 71 (Subpart H)" to sixth paragraph | | |
| | 15 | 1.3.3 | Added "Quality Control" to Nuclear Oversight support | | |
| | 17 | 1.4.3 | Removed Item 3: Deleted "Profit & Loss Quality Leaders". | | |
| | 17 | 1.4.4 | Item 1: Added option to report to Nuclear Oversight Senior Vice President. | | |
| | 18 | 1.5 | Converted to numbered items, added "2. All personnel performing Quality Control activities shall be under the direction of the Quality organization and have access to the P&L Quality Leader". | | |
| | 19 | Figure 1 | Revised Organizational Structure, "P&L Specific Quality Leaders" solid line to Nuclear Oversight, dotted line to P&L | | |
| | <u>Page</u> 32 | <u>Section</u> 4.2 | <u>Change</u> Added "Quality Requirements Flow Down - The Supplier is to flow down appropriate quality assurance requirements in subtier procurement documents." | | |
| | 41, 42 | 7.10 | Item 1: Changed calibration laboratory accreditation to reference NEI 14-05A in place of individual accreditation bodies. Item 1: Removed ANS from ISO/IEC 17025 Item 2: Removed EPRI NP-5652 (including 89-02 and 91-05) from the commitment statement. | | |
| | 65 | 17.7.6 | Updated consistent with the RAI response in MFN 16-026 dated April 15, 2016. Item 2: Clarified wording for media environmental controls. | | |
| | 66 | 18.2 | Added a new Item 4: "Audit personnel shall not assess their own work." | | |
| | 70 | 1.3 | Item 1: Changed "Quality Council" to "Integrated Management Review". | | |
| | 70 | 1.3 | Made the subject matter a separately numbered item (Item 2), and added "Safety, health, environmental items; Security topics; Business Goals" to subject matter. | | |
| | 71 | 2.1 | Added Item 2: "GEH manages information and knowledge as a resource" and Item 3: "Change is managed to assure each change is planned, controlled, communicated, monitored and tracked." | | |
| | 73 | 4.4 | Added a new section entitled "Graded Approach to Quality". | | |



GEH Quality Assurance Program Description

| Revision | Description | | | Date | Author |
|----------|--|-------------------------------------|---|------------|-------------|
| | 76 | Part IV | Added "Subpart H" to 10 CFR Part 71, added "regulations and" to the first sentence and added NEI 14-05A to guidance documents. | | |
| | <u>Page</u> 77 | <u>Section</u> Appendix A | <u>Change</u> Added GEH RAI responses from MFN 16-017 dated March 2, 2016 and MFN 16-026 dated April 15, 2016. | | |
| | All | All | Changed the revision number in the header from 12 to 13 and changed the corporate entity from GE Power and Water to GE Power. | | |
| 14 | <p>Amendment 1 to Revision 13:</p> <p>Submittal: M170236, "Amendment to NEDO-11209-A Revision 13, 'GE Hitachi Nuclear Energy Quality Assurance Program Description,'" October 6, 2017.</p> <p>Approval: M180019, "Final Safety Evaluation for GE Hitachi Nuclear Energy Amendment to NEDO 11209-A Revision 13, 'GE Hitachi Nuclear Energy Quality Assurance Program Description,'" January 10, 2018.</p> | | | | |
| | <u>Page</u> | <u>Section</u> | <u>Change</u> | 01/19/2018 | A. Peklaris |
| | <u>11</u> | Acronyms and Abbreviations | Added definitions for NOS and NPP; moved US NRC for alphabetical order. | | |
| | PART I INTRODUCTION | | | | |
| | 12 | 1.0 Scope/Applicability | Reuter Stokes to Reuter Stokes LLC | | |
| | 13 | 1.0 Scope/Applicability | GS-R-3 to GSR Part 2 | | |
| | 13 | 1.0 Scope/Applicability | Added "LLC" after "Reuter Stokes" | | |
| | PART II QAPD DETAILS | | | | |
| | 15 | 1.3.1 Profit and Loss Organizations | At end of first sentence, deleted "including Nuclear Fuels & Services and Nuclear Plant Projects." | | |
| | 15 | 1.3.1 Profit and Loss Organizations | Moved content previously in Sections 1.3.1.1, 1.3.1.2 and 1.4.3 and modified it to reflect current organization structure and responsibilities. | | |
| | 15 | 1.3.1.1 Nuclear Fuels & Services | Section 1.3.1.1 has been deleted, its content is included in paragraph 1.3.1 | | |
| | 15 | 1.3.1.2 Nuclear Plant Projects | Section 1.3.1.2 has been deleted, its content is included in paragraph 1.3.1 | | |
| | 16 | 1.3.2 Support Organizations | Updated this section to reflect new organization as shown on revised Figure 1 | | |

GEH Quality Assurance Program Description

| Revision | Description | Date | Author |
|----------|--|------|--------|
| 18 | 1.4.3 Business Leaders for Profit and Loss Organizations (P&L) and Global Supply Chain Organizations | | |
| 18 | 1.4.3 Business Leaders for Profit and Loss Organizations (P&L) and Global Supply Chain Organizations | | |
| 18, 19 | Paragraph numbers 1.4.4, 1.4.5, 1.4.6, 1.4.7 | | |
| 21 | Figure 1: Organizational Structure | | |
| | PART III | | |
| | SUPPLEMENTAL DETAILS | | |
| 72 | 1.1 General Requirements | | |
| 72 | 1.2.1 Quality Objectives | | |
| 72 | 1.2.2 Quality Management System Planning | | |
| 74 | 3.1 Planning of Product Realization | | |
| 78 | 6.0 Safety Culture & Safety Conscious Work Environment | | |
| 80 | PART IV | | |
| | REGULATORY COMMITMENTS | | |
| | GS-R-3 changed to GSR Part 2 | | |



GEH Quality Assurance Program Description

| Revision | Description | | Date | Author | |
|----------|--|-----------------------------|---|------------|-----------|
| 15 | <p>Amendment 1 to Revision 14: Submittal: M200066, "Amendment to NEDO-11209-A Revision 14, "GE Hitachi Nuclear Energy Quality Assurance Program Description," October 14, 2015. Approval: M200077, "Final Safety Evaluation for General Electric Hitachi Nuclear Energy Americas, LLC Amendment to NEDO-11209-A Revision 15, "GE Hitachi Nuclear Energy Quality Assurance Program Description," May 26, 2020.</p> | | | | |
| | 70, 71, & 72 | 18.5 | Added External/Supplier Audit scheduling to address exigent conditions. Added one RAI to Appendix A. Added Appendix B for Historical SEs. | 5/22/2020 | M. Gerdes |
| 16 | <p>Amendment 1 to Revision 15: Submittal: M200104, Proposed Revision 16 to NEDO-11209A Revision 15, "GE Hitachi Nuclear Energy Quality Assurance Program Description," July 28, 2020. Approval: Dennis C. Morey (USNRC) to Michelle Catts (GEH) on December 17, 2020, "Final Safety Evaluation for GE-Hitachi Nuclear Energy Proposed Revision 16 to Topical Report, NEDO-11209A "Quality Assurance Program Description (QAPD)," (EPID L-2020-TOP-0042).</p> | | | | |
| | 1 | Title Page | Updated Quality SVP and Quality Programs titles | 12/21/2020 | M. Gerdes |
| | 14 | Acronyms and Abbreviations | Updated copyright date from 2017 to 2020 Removed P&L – Profit and Loss Added GL – Generic Letter Added RG – Regulatory Guide Added SVP – Senior Vice President | | |
| | All | PART II and PART III | Updated overall formatting and section numbering | | |
| | All | PART II | Changed commitments and references from NQA-1-2008 with 2009 Addenda to NQA-1-2015 | | |
| | PART I | | | | |
| | 15 & 16 | 1.0 Scope and Applicability | Removed GE Reuter Stokes LLC Added services, related fuel services and decommissioning to statement for responsible activities | | |
| | PART II | | | | |
| | 17 | 1.2 | Updated terminology for clarity | | |
| | 18 | 1.3.2 | Updated to clarify Org Chart control in project plans and procedures | | |
| | 18 | 1.3.3 | Rewritten to reflect new organization structure definitions and responsibilities. Aligned section order and added details to clarify Operational and Functional Orgs Removed previous organizational details of Services, Fuels, NPP and Support Orgs | | |
| | 19 | 1.4.1 | Removed reference to President of GE Power | | |



GEH Quality Assurance Program Description

| Revision | | Description | Date | Author |
|----------|-----------------------------------|---|------|--------|
| 19 & 20 | 1.4.2 | Updated organizational titles to Quality from Nuclear Oversight, Quality Programs from Quality Oversight Removed Quality Oversight Leader Removed Performance Improvement Leader Updated Quality Leader reporting structure and responsibility details Removed Sourcing General Manager | | |
| 20 | 1.5 | Updated for Operational and Function Organization per 1.3.3 | | |
| 20 | 1.7.2 | Updated to clarify Quality Control activities and Quality organization | | |
| 21 | 1.8.2 | Updated organizational titles to Quality from Nuclear Oversight, Quality Programs from Quality Oversight | | |
| 21 | 1.9.1.3 | Updated organizational titles to Quality from NOS | | |
| 22 | 1.0 – Figure 1 | Updated Figure 1 to reflect new organization/reporting structure | | |
| 23 | 2.1.4 | Updated Quality title from Nuclear Oversight | | |
| 26 | 2.8.1, 2.8.2 | Updated to add details related to management of the QAPD | | |
| 27-33 | 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7 | Updated to reflect requirements and terminology to NQA-1-2015 and alignment to design processes | | |
| 33 | 3.8 | Added clarification to NQA-1-2015 Subpart 2.7 | | |
| 33 | 3.10 | Added commitment to NQA-1-2015 Subpart 2.7 | | |
| 34 | 4.2 | Added Software Errors as item covered in procurement documentation | | |
| 41 | 7.6.3.2 | Updated section title to Source Verification from Source Acceptance | | |
| 44 | 7.10.1 | Updated to reflect ISO/IEC 17025 2017 Edition from 2005 Edition | | |
| 45 | 7.10.2 | Updated commitment statement to NQA-1-2015 Subpart 2.14 | | |
| 52 | 11.2 | Added 11.2.6 and 11.2.7 related to Acceptance Testing of computer programs | | |
| 52 | 11.3.1 | Updated title to Test Procedures from Test Procedures for Other than Computer Programs | | |
| 52 | 11.3.2 | Removed 11.3.2 with commitment to NQA-1-2015 Subpart 2.7 | | |



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| Revision | | Description | Date | Author |
|-----------------|------------------|---|------|--------|
| 53 | 11.5.3 to 11.5.8 | Removed 11.5.3 to 11.5.8 with addition of 11.2.6 and 11.2.7 and commitment to NQA-1-2015 Subpart 2.7 | | |
| 54 | 11.6 | Updated commitment statement to NQA-1-2015 Subpart 2.7 | | |
| 66 | 17.7.4 | Updated to clarify indexing of electronic documents | | |
| 67 | 17.8 | Removed GL 88-18 and RIS 2000-18 and added RG 1.28 Rev. 5 | | |
| 68 | 18.3 | Updated title to Audit Planning and Performance from Audit Documentation | | |
| 68 & 69 | 18.3.1 | Updated to reflect requirements and terminology to NQA-1-2015 and alignment to processes | | |
| 72 | 18.7 | Added RG 1.28 Rev. 5 and removed RIS 2000-18 | | |
| PART III | | | | |
| 73 | 1.0 | Updated title to Quality Management System and Processes from Management Responsibility Updated to reflect QMS acronym | | |
| 74 & 75 | 2.2 & 2.3 | Moved Sections 1.3 and 1.4 to section 2.0 as Added Section 2.2 Communication and 2.3 Management Review | | |
| 74 | 2.0 | Updated title to Support Management from Resource Management | | |
| 74 | 2.1 | Updated title to Resources from Provision of Resources | | |
| 75 | 3.0 | Updated title to Operations from Product Realization | | |
| 75 | 3.1 | Updated title to Operational Planning and Control from Planning of Product Realization | | |
| 76 | 3.2 | Updated title to Requirements for Product and Services from Customer Related Processes | | |
| 77 | 3.3 | Moved Graded Approach to Quality to 3.3 from 4.4 | | |
| 78 | 5.0 | Updated title to Monitoring, Measurement, Analysis and Evaluation from Measurement, Analysis and Improvement | | |
| PART IV | | | | |
| 81 & 82 | All | Updated Part IV format to include section numbering and titles for: Sec 1.0 QAPD Part I and Part II Commitments Sec 2.0 QAPD Part II Regulations and Standards References | | |



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| Revision | | Description | Date | Author |
|-------------------|------------|--|------|--------|
| | | Sec 3.0 QAPD Part I and Part III Standards | | |
| 81 | 1.0 | Updated commitments to include titles | | |
| | | Updated to NQA-1-2015 from NQA-1-2008 with 2009 Addenda and added position statement to clarify NQA-1-2015 Part I and Part II commitments | | |
| 81 & 82 | 2.0 | Updated standards applicable to GEH QAPD and GEH Quality Assurance Programs | | |
| | | Updated reference to RG 1.28 to Revision 5 and added position statement for audit frequencies | | |
| | | Added reference to RG 1.164 Revision 0 and removed reference to EPRI NP-5652, GL-89-02, and GL 91-05 | | |
| | | Removed reference to GL 88-18 per NRC endorsement of RG 1.28 | | |
| | | Updated reference to NIRMA Technical Guides TG-11, TG-15, TG-16 and TG-21, 2011 Editions, per NRC endorsement of RG 1.28, removed reference to RIS 2000-18, and added position statement for NIRMA TG-21 | | |
| | | Added ML19056A451 (Provisional Recognition to ISO/IEC 17025, 2017 Edition) | | |
| | | Added statement clarifying use of additional standards | | |
| 82 | 3.0 | Added ISO 45001 removing OHSAS 18001:2007 | | |
| | | Updated commitment statement clarifying use of addition standards | | |
| APPENDIXES | | | | |
| 83 | Appendix A | Moved GEH Responses to NRC RAIs to Appendix A | | |
| 96 | Appendix B | Added Appendix B Historical NRC Safety Evaluations | | |

POLICY STATEMENT

GE Hitachi Nuclear Energy (GEH) is committed to the safety of its employees and the public above all other demands. GEH is committed to achieving the highest quality products and services through the disciplined application of the GEH Quality Management System (QMS). GEH shall provide the required designs, components, materials, parts, and services in response to customer contract requirements and in full accord with applicable standards and regulations in a manner that will ensure the health and safety of the public and workers. These activities shall be performed in compliance with the requirements of the Code of Federal Regulations (CFR), the applicable Nuclear Regulatory Commission (NRC) Facility Operating Licenses, regulatory guidance documents, applicable laws and regulations of the state and local governments, and ISO 9001 (most recent edition).

GEH has developed and implemented a QMS in order to document the company's best business practices, better satisfy the requirements and expectations of its customers, and improve the overall management of the company. The GEH QMS is comprised of this Quality Assurance Program Description (QAPD) and the implementing procedures. Together they provide for control of GEH activities that affect the quality of safety-related nuclear plant structures, system, and components (SSCs) and include all planned and systematic activities necessary to provide adequate confidence that such SSCs will perform satisfactorily in service. This QAPD may also be applied to certain equipment and activities that are not safety-related, but support safe plant operations, or where other NRC guidance establishes program requirements. GEH strives to continually improve the overall effectiveness of the Quality Management System.

The QAPD is the top-level policy document that establishes the manner in which quality is to be achieved and presents GEH's overall philosophy regarding achievement and assurance of quality. Implementing procedures assign more detailed responsibilities and requirements, and define the organizational interfaces involved in conducting activities within the scope of the QMS. Compliance with the QAPD and implementing procedures is mandatory for personnel directly or indirectly associated with implementation of the GEH QMS.



Jay Wileman President and CEO

12/22/2020

Date

GE Hitachi Nuclear Energy



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ACRONYMS AND ABBREVIATIONS

| Acronym | Definition |
|----------------|--|
| ASME | American Society of Mechanical Engineers |
| CAQ | Condition Adverse to Quality |
| CFR | Code of Federal Regulations |
| EHS | Environmental Health and Safety |
| EPRI | Electric Power Research Institute |
| GEH | GE Hitachi Nuclear Energy |
| GL | Generic Letter |
| GNF | Global Nuclear Fuel |
| IEC | International Electrotechnical Commission |
| ILAC | International Laboratory Accreditation Cooperation |
| ISO | International Standards Organization |
| M&TE | Measuring and Test Equipment |
| US NRC | United States Nuclear Regulatory Commission |
| QA | Quality Assurance |
| QAP | Quality Assurance Program |
| QAPD | Quality Assurance Program Description |
| QMS | Quality Management System |
| RG | Regulatory Guide |
| RIS | Regulatory Issue Summary |
| SCAQ | Significant Condition Adverse to Quality |
| SSC | Structures, systems and components |
| SVP | Senior Vice-President |

PART I INTRODUCTION

1.0 SCOPE/APPLICABILITY

This Quality Assurance Program Description (QAPD) implements the GE Hitachi Nuclear Energy (GEH) Quality Management System and has been adopted by the following companies affiliated with the General Electric Company (GE) and the GE Power business unit that are engaged in providing products and services to the nuclear power industry and which have agreed to be bound by the provisions of this QAPD, including the assignment of authority and responsibility set forth herein:

- GE Hitachi Nuclear Energy LLC
- GE Hitachi Nuclear Energy Americas LLC
- GE Hitachi Nuclear Energy International LLC
- Global Nuclear Fuel Americas LLC
- Global Nuclear Fuel Japan Ltd.

The companies that have adopted this QAPD have authorized the President and Chief Executive Officer (hereinafter the “President”) of GE Hitachi Nuclear Energy LLC to establish the quality program as described in this document and have committed each of the companies to implement the quality program.

Additional companies affiliated with GE may adopt this QAPD in the future by agreeing to be bound by its provisions. For ease of reference this QAPD is identified as a topical report issued by GE Hitachi Nuclear Energy (GEH) notwithstanding that it has been adopted by the companies identified above. References to GEH in this QAPD shall be interpreted to refer to and apply to each of the companies that have adopted this QAPD with compliance verified by periodic audits and self-assessment activities.

The companies that have adopted this QAPD are comprised of both operating components and business-specific organizations. These organizations are responsible for activities including, but not limited to, marketing, design, procurement, manufacture, installation, inspection, testing, servicing, project management, and operation of certain nuclear power plant products, services, fuel and fuel related services, radioactive material packaging and transportation, and decommissioning. GEH also offers new plant designs and engineering services such as system studies, diagnostics, fuel and service analyses, and product and service testing.

This QAPD is divided into the following parts:

- Part I: Introduction
- Part II: QAPD Details (per 10 CFR 50 Appendix B)
- Part III: Supplemental Details
- Part IV: Regulatory Commitments

Part II of this QAPD describes the portion of the QMS required to meet the requirements of the United States of America contained in 10 CFR Part 50 Appendix B, 10 CFR Part 71 (Subpart H), 10 CFR Part 21, and ASME NQA-1-2015 Edition. Specifically, it applies to work involving

GEH Quality Assurance Program Description

structures, systems and components (SSC) for nuclear power plants and fuel reprocessing plants that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. GEH may extend this program to other areas that do not meet these criteria.

Part III addresses the supplemental portions of the QMS that are not specifically addressed by 10 CFR 50 Appendix B or NQA-1 to create an integrated quality program for projects that may refer to ISO 9001, GSR Part 2, KTA-1401 and other standards as applicable. Part III is not reviewed or approved by the NRC.

In some cases, Part II and Part III of this QAPD are supplemented by quality plans at specific locations or functional areas of GEH to assist in the implementation of the specific requirements for those activities. In all cases, this QAPD will be a referenced document. Regardless, this QAPD document is the overall description of the GEH Nuclear Energy Quality Assurance Program that implements the GEH Quality Management System. When there are conflicts between the requirements of any of these documents, the QAPD shall be followed, and the conflict shall be reported in accordance with Part II, Section 16 of this document.

This QAPD is applicable at the following GEH facilities and other locations performing contracted services:

- Wilmington, NC
- San Jose, CA
- Pleasanton, CA (Vallecitos Site)
- Philadelphia, PA (Service Shop)
- Kurihama, Japan (NOTE: GNF-J utilizes Part I and II of this QAPD for 10 CFR 50, Appendix B activities. GNF-J maintains a separate ISO quality program that is not covered under the scope of this QAPD)

**PART II QAPD DETAILS****1.0 ORGANIZATION****1.1 General**

This Section describes the GE Hitachi Nuclear Energy (GEH) organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying the Quality Assurance Program Description (QAPD).

- 1.1.1 The GEH organizational structure encompasses those positions responsible for establishing, managing, implementing, verifying, interpreting, and continually improving the GEH Quality Management System (QMS).
- 1.1.2 This QAPD describes the relationships of organizations within GEH, and between GEH and principal contractors, in regard to responsibilities and authority for performing activities within the scope of the QAPD.
- 1.1.3 Adherence to this QAPD includes the organizational elements located at the GEH headquarters facility in Wilmington, NC and all satellite facilities of GEH.
- 1.1.4 Additionally, adherence to this QAPD may be applied to work performed at customer or supplier locations where required by either regulations or contract requirements.

1.2 Management Commitment

- 1.2.1 The GEH business shall implement this quality program and demonstrate, by performance inside and outside of the Company, total dedication to the attainment of quality leadership.
- 1.2.2 GEH management is committed to implement and maintain the QMS and continually improve its effectiveness by:
 - Communicating to the organization the importance of meeting customer, statutory and regulatory requirements
 - Establishing the quality policy
 - Ensuring that quality objectives are established
 - Conducting management reviews
 - Ensuring the availability of resources
- 1.2.3 GEH management ensures that all quality programs are communicated to employees. To achieve this, any or all of the following may be used:
 - Company communications
 - All employee meetings
 - Staff meetings
 - Internal correspondences and memos
 - Training

1.3 Organizational Structure

- 1.3.1 For the purposes of managing the GEH QMS, the organizational structure is shown in Figure 1.

**GEH Quality Assurance Program Description**

1.3.2 Organizational Charts that depict typical organizational structure and functional descriptions are controlled and included in applicable plans, procedures and instructions and, as necessary, in project plans and procedures for specific project related work to be performed.

1.3.3 Operational Organizations and Functional Support Organizations

1.3.3.1 The GEH business includes Operational Organizations that are comprised of operational segments responsible for project management, product and services management and delivery, continued plant operations support, and development of new plants, technologies and related offerings to the industry. These organizations are established to comply with regulatory requirements.

1.3.3.2 The GEH business includes Functional Support Organizations that are responsible for facilitating and supporting the activities of the Operational Organizations. These Functional Support Organizations include key functions such as Quality, Engineering, Manufacturing Operations and Sourcing. Additional groups include but are not limited to Sales, Commercial Operations, Finance, Human Resources, Legal/Compliance, and Government Affairs.

1.3.3.3 The Quality Organization is responsible for managing and supporting implementation of the QMS and the QAPD with responsibility for Quality Programs and Quality Oversight.

1.3.3.4 Activities performed by the Operational or Functional Support organizations that affect quality are performed under the direction of Executive management, normally Senior Vice Presidents (SVPs), who report to the President for purpose of the responsibilities of this QAPD.

1.3.3.5 Reporting to the SVPs are Managers or Leaders, who have been trained in accordance with the QAPD and in accordance with implementing the written procedures.

1.3.3.6 The SVPs, Managers, and Leaders ensure that personnel working under their direction are trained in accordance with written procedures and ensure that only trained personnel are permitted to perform activities affecting quality.

1.3.3.7 These managers and leaders are tasked with assuring that only trained personnel are permitted to perform those activities for which they are qualified.

1.4 Management Positions

Key organizational management positions are described below. The specific organizational 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. Any internal disagreements that cannot be resolved through the system described in this QAPD are to be submitted to the President's office for resolution.

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1.4.1 President and Chief Executive Officer

1.4.1.1 The President has executive responsibility and sets appropriate directives, policies, goals and objectives to ensure the total quality of all GEH products and services.

1.4.1.2 The President retains specific duties and responsibilities that cannot be delegated. These include but are not limited to:

- Approving this QAPD through the Statement of Policy
- Establishing the GEH organizational structure, including the organizational roles, responsibilities, authority and accountability
- Integrating quality assurance program activities into overall business activities
- Monitoring key performance indicators as part of a management review

1.4.1.3 The President has established forums for communication and periodic reviews of quality objectives and business commitments with the business segments and quality management, including but not limited to:

- Periodic reviews of business and quality objectives (customer scorecards, delivered product defects, corrective actions, trends, and process improvements)
- Management reviews of the status and adequacy of the GEH Quality Management System

1.4.2 Quality Senior Vice President

1.4.2.1 The Quality Senior Vice President (SVP) reports to the President and Chief Executive Officer.

1.4.2.2 The Quality SVP is responsible for governance and implementation of the QAPD in accordance with regulatory requirements and GEH company requirements/commitments.

1.4.2.3 The Quality SVP reports to top management on the performance of the quality program and any need for improvement.

1.4.2.4 The Quality SVP is responsible for maintaining this QAPD and an organization that is appropriately staffed to effectively manage its duties and responsibilities, including but not limited to, performance of audits and oversight activities to ensure adherence to and effectiveness of the overall quality assurance program.

1.4.2.5 The Quality SVP assigns the responsibility to appropriate quality groups in the business the authority and organizational freedom to carry out the following:

- a) Identify quality assurance issues
- b) Initiate corrective action
- c) Verify that required action has been properly implemented
- d) Limit or control further processing, delivery or installation of a nonconforming item, or an unsatisfactory condition until proper disposition has occurred
- e) Freedom to oversee and verify compliance with the regulatory requirements and industry and international standards

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- 1.4.2.5.1 This structure is designed to provide sufficient independence from cost and schedule when opposed to quality and safety considerations, provides the required independence between the performers and the verifiers, and enables a direct line of communication to the Quality SVP and President.

1.4.2.6 Quality Leaders

- 1.4.2.6.1 The Quality Leaders are assigned the responsibility to support the implementation of the quality requirements set forth in this QAPD within their assigned organizations.
- 1.4.2.6.2 The Quality Leaders are responsible for verification that administrative controls are implemented or assuring that an activity has been correctly performed within their assigned organizations.
- 1.4.2.6.3 This verification includes leadership of quality engineers, inspection personnel, and performance of independent inspections or verification activities.
- 1.4.2.6.4 The Quality Leaders report to the Quality Organization and indirectly to the Operational or Functional Organizations or may report to the Operational or Functional Organizations and indirectly to the Quality Organization.
- 1.4.2.6.5 This structure is designed to provide sufficient independence from cost and schedule when opposed to quality and safety considerations, provides the required independence between the performers and the verifiers, and enables a direct line of communication to the Operational or Functional Leaders and the Quality SVP.

1.5 Organizational and Functional Responsibilities

The responsibilities of the Operational and Functional Organizations are detailed in implementing procedures.

1.6 Interface Responsibilities

Interfaces are defined either through policy in the case of defining interfaces between legal entities or by procedures.

1.7 Responsibilities of all Employees and Contractors**1.7.1** All employees and contractors are responsible for the following:

- Ensuring strict compliance with laws and regulations pertaining to the quality, safety, and performance requirements in every country where GEH products and services are offered.
- Incorporating quality during all work activities.
- Reporting conditions that are not consistent with the requirements of the QAPD through the Corrective Action Program.

1.7.2 All personnel performing Quality Control activities shall be under the direction of the Quality organization for implementation of the quality requirements set forth in this QAPD and have access to the Quality SVP.

**GEH Quality Assurance Program Description**

1.8 Authority to Stop Work

- 1.8.1** All employees and contractors have the authority and responsibility to stop work if continuing the work is or could be detrimental to the final product or would be masked by successive manufacturing activities or if the activity is not compliant with the procedural guidance or would create an unsafe condition.
- 1.8.2** The Quality SVP, Quality Programs organization and the Quality Leaders have the authority and the responsibility to issue a stop work notice and control further processing, delivery, installation, or use of nonconforming products or services.
- 1.8.3** This authority is to ensure that cost and schedule considerations do not override quality or safety considerations.

1.9 Delegation**1.9.1 Delegation Inside the GEH Organization**

- 1.9.1.1** Each Manager, Supervisor or Leader may assign the performance of their duties to their direct reports who are qualified to perform such duties. However, the responsibility for those duties cannot be assigned or delegated.
- 1.9.1.2** Managers, Supervisors or Leaders, if qualified, may perform the work for their subordinates.
- 1.9.1.3** The President, Quality SVP and other positions identified herein retain overall responsibility for the program although authority to accomplish assigned tasks may also be delegated.

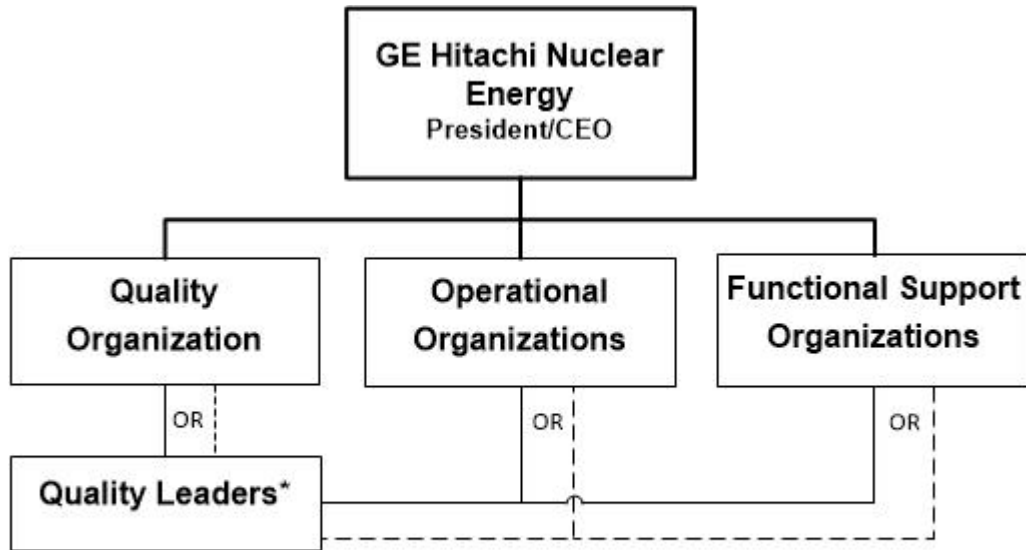
1.9.2 Delegation Outside the GEH Organization

Delegation of work to participants outside of the GEH Quality Assurance Program, such as subcontractors or suppliers, will be identified and described as follows:

- The organizational elements responsible for the delegated work are identified and documented.
- Management controls and lines of communication between the GEH designated person and the delegated organization are identified and documented.
- Responsibility for the Quality Assurance Program and the extent of management oversight is established.
- The performance of delegated work is formally evaluated.

1.10 Commitment

In establishing its organizational structure, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria I, and NQA-1-2015 Edition, Requirement 1.



*May report directly or indirectly to SVP of Quality for matters affecting Nuclear Quality; Ref. QAPD Section 1.4.2.6

FIGURE 1: ORGANIZATIONAL STRUCTURE

2.0 QUALITY ASSURANCE PROGRAM

2.1 General

This section describes the GE Hitachi Nuclear Energy (GEH) quality assurance program, as documented through this Quality Assurance Program Description (QAPD) and its implementing policies, procedures and instructions, and identifies the associated requirements for planning, implementing, monitoring, and maintaining the program. This program was documented, approved, and implemented prior to the commencement of the activities within its scope.

- 2.1.1** The quality assurance program is maintained and continually improved through the use of quality policies, quality objectives, periodic audit and assessment results, analysis of data, corrective and preventive action, and periodic management review.
- 2.1.2** The quality program is binding on all companies that have adopted this QAPD, including participating organizations from the President to all employees and contractors whose activities may influence quality.
- 2.1.3** Controls are provided over activities affecting quality to an extent consistent with the importance of those activities.
- 2.1.4** The President, Quality SVP and other positions identified herein retain and exercise the responsibility for the scope and implementation of an overall QAPD.
- 2.1.5** Activities performed at GEH that are included in the scope of this QAPD include but are not limited to: training, indoctrination and certification of personnel; design activities; procurement; instructions, procedures and drawings; document control; control and identification of purchased material parts and components; special processes; test and inspection; control of Measuring and Test Equipment (M&TE); handling, storage and shipping; maintenance of test, inspection and operating status of items; control of nonconforming material, corrective action, records, and audits.
- 2.1.6** Project, product, or service specific Quality Plans may be developed to supplement the requirements of this QAPD and provide for specific contractual requirements and alternate quality assurance standards when necessary.

2.2 Controlled Conditions

- 2.2.1** Planning and performance of activities affecting quality are accomplished under suitably controlled conditions as delineated in appropriate implementing procedures and instructions.
- 2.2.2** Controlled conditions include:
 - The use of appropriate equipment (hardware and software)
 - Suitable workspace and utilities
 - Suitable environmental conditions for accomplishing the activity, such as adequate cleanliness
 - Supporting services to achieve conformity to product and service requirements
 - Assurance that all prerequisites for the given activity have been satisfied

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- 2.2.3 Special controls, processes, test equipment, tools, and skills to attain the required quality of activities or items and verification are provided.
- 2.2.4 Work environment in the manufacturing, assembly, inspection, test, and material storage areas is maintained as required to achieve conformity to product specifications, applicable standards, and regulations.
- 2.2.5 GEH policies, procedures and instructions related to Quality and Environmental Health and Safety, define the implementation of requirements for adequate and safe facilities and plant activities.

2.3 Indoctrination and Training

- 2.3.1 GEH personnel indoctrination and training is commensurate with the scope, complexity, and importance of the activities; and with the education, experience, and proficiency of the personnel performing the activity.
- 2.3.2 Training shall be provided to achieve initial proficiency, maintain proficiency, and adapt to changes in technology, methods, or job responsibilities.
- 2.3.3 On-the-job training shall be used if direct hands-on applications or experience is needed to achieve and maintain proficiency.
- 2.3.4 Personnel performing or managing activities affecting quality receive indoctrination and training in their job responsibilities and authority, that includes general criteria, technical objectives, requirements of applicable codes and standards, regulatory commitments, company procedures, and quality requirements.
- 2.3.5 Records of indoctrination and training include the employee's name, topic covered and date of completion.

2.4 Qualification Requirements

- 2.4.1 Quality-related activities that require qualification of personnel are listed in this section.
- 2.4.2 Qualification is controlled by written procedures and only those personnel who have met the requirements are permitted to perform these activities.
- 2.4.3 The qualification of inspection, test, auditor, lead auditor and special process personnel shall be certified in writing and records thereof maintained.
- 2.4.4 The need for initial and periodic special physical characteristics and physical examination of personnel shall be identified, and copies of appropriate objective evidence shall be retained.

2.4.5 Nondestructive Examination

The companies that have adopted this QAPD shall have a written practice for qualification of nondestructive examination personnel who perform processes such as ultrasonic, radiographic, magnetic particle, liquid penetrant, electromagnetic, leak, or visual examination in accordance with applicable industry codes and standards.

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2.4.6 Inspection and Test

Procedures specify minimum initial capabilities, education, experience, and training, as well as, examination, performance, re-evaluation periods, and permissible gaps in activity, for inspection and test personnel.

2.4.7 Lead Auditor

2.4.7.1 Requirements for a lead auditor's qualification are defined in written procedures.

2.4.7.2 The evaluation criteria include education, experience, communication skills, training, audit participation, examination as well as maintenance of proficiency and requalification.

2.4.7.3 Audit team members, including technical specialists, shall have, or be given, appropriate training (including orientation) to develop their competence for performing audits.

2.5 Detection and Correction of Quality Problems

2.5.1 A corrective action program has been established to document quality problems, assign actions to correct the problem, take preventative steps to prevent reoccurrence, and to verify effective remediation.

2.5.2 The corrective action program is described in Section 16 of this QAPD.

2.6 Assessment of Effectiveness

2.6.1 Quality personnel monitor activities affecting quality against acceptance criteria to ensure satisfactory performance. These criteria are outlined in implementing procedures.

2.6.2 GEH management reviews the GEH Quality Management System to ensure its continuing suitability and effectiveness. The review is performed to integrate and communicate quality-related matters, problems, corrective actions, status and effectiveness of assigned projects for continuous improvement, and annual reports on the status and adequacy of the quality management system to the top level management. These reviews identify opportunities for improvement and needed changes. Records are maintained of the management review meetings.

2.6.2.1 During management reviews, typical input includes the following:

- Results of audits and assessments
- Customer feedback
- Customer and regulatory requirements
- Process performance and product conformity
- Status of corrective and preventive actions
- Follow-up actions from previous management reviews
- Planned changes that could affect the Quality Management System
- Recommendations for improvement

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2.6.2.2 Output from the management review shall include decisions and actions related to the following:

- Improvement of the effectiveness of the Quality Management System and its processes
- Improvement of product related to customer requirements
- Resource needs to ensure proper implementation of the Quality Management System, and assignment of responsibilities for completing actions

2.6.3 Managers review those portions of the program under their area of responsibility.

2.6.4 To ensure effective implementation, these reviews take place at least once each fiscal year.

2.7 Grace Period

A grace period of 90 days may be applied to provisions that are required to be performed on a periodic basis unless otherwise noted. The grace period does not allow the clock for a particular activity to be reset forward. The clock is reset backwards by performing the activity early.

2.8 Quality Assurance Program Description Management

2.8.1 Proposed changes to this QAPD are submitted to the NRC for review and approval per 10 CFR 50.4(b)(7)(ii). The proposed changes will be termed “amendments” to the QAPD and will be presented as markups of the current accepted version along with a basis discussion for each change.

2.8.2 Upon receipt of the NRC Safety Evaluation (SE) and acceptance of each amendment, the QAPD revision shall be finalized and issued as “NEDO-11209-A” with the Draft designation removed and the revision number incremented. The SEs for each previous NRC accepted amendment, are provided in Appendix B. The SE for the current revision is placed after the “Disclaimer” page in the front of the document.

2.9 Commitment

In establishing its Quality Assurance Program, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria II and NQA-1-2015 Edition, Requirement 2.



3.0 DESIGN CONTROL

3.1 GENERAL

- 3.1.1** This section describes the GE Hitachi Nuclear Energy (GEH) program that ensures all engineering organizations of the companies that have adopted this Quality Assurance Program Description (QAPD) have overall responsibility for the control of the design process from its inception to the final result.
- 3.1.2** In controlling the design process the goal is to ensure that a design and its associated design documentation meet all applicable technical requirements, regulatory requirements, codes and standards, and contractual requirements.
- 3.1.3** The GE Hitachi Nuclear Energy (GEH) design program extends to the control of the design, the control of design changes, and to temporary modifications to structures, systems, components, and software (including design reports) subject to the provisions of this QAPD.
- 3.1.4** This section describes control of the design inputs, design processes, design analyses, design verification, change control, interface control, Quality Assurance (QA) responsibilities, and documentation and records.
- 3.1.5** Design control ensures that design inputs are correctly translated into design outputs (such as specifications, drawings, procedures, reports, and instructions) so that the final design output can be related to the design input in sufficient detail to permit verification.

3.2 Design Inputs

- 3.2.1** Engineering is responsible for identifying and documenting design inputs for each design project.
- 3.2.2** The design inputs are specified to the level of detail necessary to permit the design activities to be carried out in a correct manner and to provide a consistent basis for completing design activities, making design decisions, accomplishing design verification, and evaluating design changes.
- 3.2.3** Each design requires that the design inputs be verified. The purpose of this verification is to determine whether the design inputs were correctly selected and whether the assumptions made to perform the design activity were adequately identified and reasonable.
- 3.2.4** When GEH performs design activities for nuclear licensees, GEH records may not contain all necessary design information. In such cases, GEH will need to obtain and document design inputs from the licensee for use in the design.

3.3 Design Process

3.3.1 Design Responsibility

- 3.3.1.1** The Engineering organization develops and maintains procedures that comply with the requirements of this QAPD and that specify the activities that are to be performed in each design project. The procedures related to design and

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development processes describe the details of the design and development stages with responsibilities and authorities; and appropriate review, verification, and validation activities.

3.3.1.2 For each specific design project, the GEH design organization documents and organizes the design information in sufficient detail to permit the design process to be performed in a correct manner, and to permit verification that the design meets requirements.

3.3.1.3 Appropriate quality standards are also identified and their selection reviewed and approved.

3.3.2 Design Methods

3.3.2.1 The design methods, materials, parts, equipment, and processes that are essential to the function of the structures, systems, and components (SSC) or to the completion of a design report are selected and independently reviewed for suitability for their intended application.

3.3.2.2 Design methods are documented, controlled, reviewed, and approved as applicable. Where design activities are repeated, documented design methods are reviewed on a periodic basis to confirm continued applicability and updated as necessary.

3.3.3 Design Result

3.3.3.1 The engineering organizations are responsible for delivering design output that meets design process requirements to ensure that the design result:

- Is based upon and accurately incorporates verified design inputs
- Is documented in sufficient detail to permit the design to be recreated independently in the absence of the original designer
- Is relatable to the design input by documentation in sufficient detail to support design verification
- Defines criteria for inspections and tests when they are required
- Includes or references appropriate acceptance criteria
- Identifies assemblies and/or components that are part of the item being designed
- For commercial grade items refer to Section 7.8 of this QAPD

3.3.3.2 Applicable information derived from plant operating and construction experience is made available to the responsible organization as appropriate.

3.3.3.3 Characteristics critical to the safe and proper functioning of the product are classified and designated on the appropriate drawings and specifications according to implementing procedures or appropriate international practices specified by the customer.

3.3.3.4 The design and development outputs provide information for purchasing, production, and product acceptance criteria.

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3.3.3.5 Requirements for special processes such as welding, heat-treating, and nondestructive examination are specified on design documentation.

3.4 Design Analyses

Design analyses are 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 recourse to the originator.

3.4.1 Use of Computer Programs

3.4.1.1 Each computer program used for design analysis is accepted for use and controlled by applying the applicable requirements of this section prior to use (i.e., pre-verified or controlled computer programs), or the computer program's results are independently verified with the design analysis for each application.

3.4.1.2 The acceptance of controlled computer programs used for design analysis, and verification methods applied to the results of unproven programs, meet the following requirements:

- The computer program, or the verification method applied to the computer program results, produces correct solutions for the applied mathematical model within defined limits for each parameter employed.
- The applied mathematical model produces a valid solution to the physical problem associated with the particular application.

3.4.2 Documentation of Design Analyses

3.4.2.1 Documentation of design analyses is legible, reproducible, and includes the following:

- Identification of the person responsible for the design
- The scope and/or objective of the analyses
- Design inputs and their sources
- Results of literature searches or other background data if applicable
- Assumptions and indication of those assumptions that must be verified as the design proceeds
- Methods and equations that are implemented in computer programs, or if a pre-verified computer program is used, the computer type, program name and revision, and confirmation that the computer program is used within its approved application
- Design results and output
- Review and/or verification and approval
- A record of comments made or issues raised during review and/or verification, and the resolution of those comments and issues
- Identification of the persons originating and performing the review, verification and approval
- Identification of the system or component for which the calculation applies



3.4.3 Design and Development Review

- 3.4.3.1** The design and development activities are reviewed according to the requirements of the related design review procedures. The review process evaluates design outputs against input requirements; and provides an opportunity to take actions on any problems identified.
- 3.4.3.2** The review team consists of representatives of functions concerned with the activity.
- 3.4.3.3** Records of the results of the reviews and any necessary actions are maintained.

3.5 Design Verification

The companies that have adopted this QAPD have a design verification program that ensures that design inputs, calculations, changes, and results are independently reviewed and approved by personnel other than the preparer of the design or design document.

3.5.1 Verification Responsibilities

- 3.5.1.1** The responsible design organization identifies and documents the design verification scope and method(s) used.
- 3.5.1.2** The results of design verification are documented with the identification of the verifier clearly indicated.
- 3.5.1.3** Design verification is performed by one or more competent individuals or groups other than those who performed the design but who may be from the same organization.
- 3.5.1.4** This verification may be performed by the originator's manager, provided:
 - a) the manager did not specify a singular design approach or rule out certain design considerations and did not establish the design inputs used in the design; and
 - b) the manager is the only individual in the organization competent to perform the verification

3.5.2 Verification Timing

- 3.5.2.1** Design verification is performed prior to releasing the design for procurement, manufacture, construction, licensing application or use by another design organization, except where this timing cannot be met, such as when insufficient data exist. In those cases, the unverified portion of the design is identified and controlled.
- 3.5.2.2** In all cases the design verification is completed prior to relying upon the component, system, structure, or computer program to perform its intended function.

3.5.3 Verification of Modifications

If the design is modified to resolve verification findings, the modified design is verified prior to release or use.



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3.5.4 Extent of Design Verification

- 3.5.4.1 The extent of the design verification is a function of the importance to safety, the complexity of the design, the degree of standardization, the state of the art and the similarity with previously proven designs.
- 3.5.4.2 The extent is defined by the originator in the verification scope, agreed to by the verifier, and approved by the manager.
- 3.5.4.3 Where the design has been previously verified, the verification extent or scope may be reduced; verification need not be duplicated for identical designs. However, the applicability of previously verified designs, with respect to meeting pertinent design inputs, is verified for each application.
- 3.5.4.4 Known problems affecting previously verified designs and their effects on other features are considered.
- 3.5.4.5 The original design and associated verification documentation are referenced in records of subsequent application of the verified design.

3.5.5 Verification Methods

Acceptable verification methods include, but are not limited to, any one or a combination of the following:

3.5.5.1 Design Reviews

- 3.5.5.1.1 Design reviews for verification may be performed by an individual or by a team.
- 3.5.5.1.2 A design review provides assurance that the final design is correct and satisfactory by addressing the following, where applicable:
 - The design inputs were correctly selected.
 - Assumptions necessary to perform the design activity are adequately described and reasonable. Where necessary, assumptions are identified for subsequent verifications when the detailed design activities are completed.
 - Appropriate design methods and computer programs were used and design calculations were performed correctly.
 - Design inputs were correctly incorporated into the design.
 - Design output is reasonable compared to design inputs.
 - Design inputs necessary for interfacing organizations are specified in the design documents or in supporting procedures or instructions.
 - Suitable materials, parts, processes, and inspection and testing criteria are specified.

3.5.5.2 Alternate Calculations

- 3.5.5.2.1 Alternate calculations use alternative methods to verify correctness of calculations.

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- 3.5.5.2.2 The appropriateness of assumptions, input data, and calculation method used are considered.
- 3.5.5.2.3 When calculations are performed by computers, the review also considers the computer program; its associated computer hardware, and system software.

3.5.5.3 Qualification Tests

- 3.5.5.3.1 Testing demonstrates adequacy of performance under conditions that simulate the most adverse design conditions. Operating modes and environmental conditions are considered in determining the most adverse conditions.
- 3.5.5.3.2 Where the test is intended to verify only specific design features, the other features of the design are verified by other approved verification methods.
- 3.5.5.3.3 When tests are being performed on models or mockups, scaling laws are established and verified. The results of model test work are documented, subjected to error analysis, where applicable, and evaluated prior to use in the final design.
- 3.5.5.3.4 If qualification testing indicates that modifications to the item are necessary to obtain acceptable performance, the modification is documented and the item modified and retested or otherwise verified to ensure satisfactory performance.

3.5.5.4 Design and Development Validation

- 3.5.5.4.1 Design validation is performed to ensure that a design meets a customer's requirements. Validation is normally performed for the final product under controlled conditions by testing, lead use assemblies, following the performance of a lead unit(s), environmental testing, system and plant pre-operational and startup testing, mock-up testing, etc., preferably prior to delivery to customer.

3.6 Change Control

- 3.6.1 Changes to design inputs, final designs, field changes, temporary and permanent modifications, and system application are justified and subject to design control measures commensurate with those applied to the original design.
- 3.6.2 These measures include evaluation of effects of those changes on the overall design and on any analysis upon which the design is based.
- 3.6.3 The evaluations include facility configurations that affect operation or performance of a GEH product such as conditions that occur during operation, maintenance, test, surveillance, and inspection activities.
- 3.6.4 The same affected groups or organizations that reviewed and approved the original design documents shall approve design changes.
- 3.6.5 When organizational responsibilities change, the owner or designee is responsible to designate a new responsible organization that has demonstrated competence in the

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specific design area and has an adequate understanding of the requirements and intent of the original design.

- 3.6.6 Where a significant design change is necessary due to a design error, the design and verification procedures are reviewed for adequacy and modified as necessary.
- 3.6.7 Design change requests from the field are processed in accordance with procedures for the communication of instructions to the field to implement approved changes.
- 3.6.8 Records of the changes, reviews, and any necessary actions are maintained in accordance with applicable procedures for processing design records.

3.7 Interface Control

- 3.7.1 The companies that have adopted this QAPD are responsible to control interfaces among themselves and between their organizations and their subcontractors and suppliers.
- 3.7.2 Interface control is specified in implementing procedures that assign responsibility to the participating design organizations for review, approval, release, distribution, and revision of documents across design interfaces.
- 3.7.3 Design information transmitted across interfaces identifies the status of the design information for the document provided and identifies incomplete items that require further evaluation, review, or approval.
- 3.7.4 Where it is necessary to initially transmit design information by other informal means, the transmittal is confirmed promptly by a controlled document.

3.8 Software Design Control

The design process for development of software is documented, approved by the responsible organization, and controlled per QAPD Section 3.0 except for Sections 3.2 - Design Input, 3.3 - Design Process, 3.5 - Design Verification, and 3.6 - Change Control, which are performed in accordance with NQA-1-2015 Subpart 2.7.

3.9 Documentation and Records

- 3.9.1 Design documentation and records, that provide evidence that the design and design verification processes were properly performed are collected, stored, and maintained in accordance with Section 17, Quality Assurance Records, of this QAPD.
- 3.9.2 Design documentation and records include not only final design documents, such as drawings and specifications, and revisions to those documents, but also documentation that identifies the important steps in the design process, including sources of design inputs, that support the final design.

3.10 Commitment

In establishing provisions for design control, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria III and NQA-1-2015, Requirement 3. In establishing requirements for computer program design control, GEH commits to compliance with NQA-1-2015 Subpart 2.7.



4.0 PROCUREMENT DOCUMENT CONTROL

4.1 General

This section describes the GE Hitachi Nuclear Energy (GEH) program that ensures sufficient technical, quality, and regulatory requirements to ensure the requisite level of quality are included or referenced in the documents for procurement of items and services. The program is applied to all phases of procurement and may require verification of activities of suppliers below the first tier.

4.2 Procurement Document Contents

The following requirements and information are included in procurement documents, as applicable:

- Scope of Work Statement – A statement of the scope of work to be performed by the Supplier
- Technical Requirements - Drawings, specifications, codes, standards, regulations, and procedures or instructions including revisions that describe the items or services to be furnished
- Appropriate customer unique requirements, including customer specified surveillance or inspection at the supplier's facility
- The procurement documents also identify appropriate test, inspection and acceptance criteria for evaluating the supplier's performance
- Requirements for qualification of personnel
- Quality Assurance Program Requirements – A reference to the supplier's documented Quality Assurance Program that has been reviewed and determined to meet the applicable requirements of 10 CFR Part 50 Appendix B consistent with the circumstances of the procurement. Alternately, Suppliers may work to the GEH Quality Assurance Program and implementing procedures.
- Quality Requirements Flow Down - The Supplier is to flow down appropriate quality assurance requirements in subtier procurement documents.
- Right of Access – Provisions for access to the Supplier's and subtier Supplier's facilities and records for surveillance or audit by GEH, their designated representative and others authorized by GEH.
- Documentation Requirements - Identification of supplier documentation to be submitted to GEH for information, review, or approval. The time of submittal will also be specified. GEH will specify retention times and disposition requirements for records to be kept by the Supplier.
- Nonconformances – The procurement documents specify the GEH requirements for the Supplier's reporting of nonconformances, including invoking the requirements of 10 CFR Part 21 if applicable.
- Software Errors – The procurement documents specify the GEH requirements for the Supplier's reporting of software errors, including invoking the requirements of 10 CFR Part 21 if applicable.
- Spare and Replacement Parts – The procurement documents specify the applicable requirements to identify spare and replacement parts or assemblies and the related data required for ordering these parts or assemblies.



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- Commercial Grade Items - Procurement documents for Commercial Grade Items that will be procured by GEH for use as Safety-Related items contain technical and quality requirements such that the procured item can be appropriately dedicated per Section 7.8 of this QAPD.

4.3 Review of Procurement Documents

- 4.3.1** Technical or quality changes made as a result of bid evaluations or negotiations are incorporated in the procurement documents prior to issuance.
- 4.3.2** Personnel performing reviews have access to pertinent information and an adequate understanding of the requirements and intent of the procurement documents.

4.4 Procurement Document Changes

Changes to procurement documents are subject to the same level of control as was exercised in the preparation of the original procurement documents.

4.5 Commitment

In establishing controls for procurement documents, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria IV and NQA-1-2015 Edition, Requirement 4.

**5.0 INSTRUCTIONS, PROCEDURES, AND DRAWINGS****5.1 General**

This section establishes the requirements to ensure that activities affecting quality are prescribed by and performed in accordance with implementing procedures or work instructions (i.e., approved procedures, instructions, and drawings).

5.2 Requirements

- 5.2.1** Activities affecting quality are prescribed by controlled implementing procedures of a type appropriate to the circumstance and will be accomplished in accordance with these implementing procedures or work instructions. These procedures shall be readily available at their point of use.
- 5.2.2** Activities affecting quality are suspended if they cannot be accomplished as described in controlled implementing procedures.
- 5.2.3** Engineering drawings and specifications are also controlled to ensure that products are identified during all stages of production, delivery, and installation; and that the products are traceable.

5.3 Content of Procedures

- 5.3.1** The activity is described to a level of detail that is based on one or more of the following: the complexity of the task, the need to ensure consistent and acceptable results, the significance of the item, the work environment, or worker proficiency and ability.
- 5.3.2** Quantitative and/or qualitative acceptance criteria are included for determining that prescribed activities have been satisfactorily accomplished and that prescribed results have been satisfactorily attained.

5.4 Commitment

In establishing procedural controls, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria V and NQA-1-2015 Edition, Requirement 5.



6.0 DOCUMENT CONTROL

6.1 General

GE Hitachi Nuclear Energy (GEH) has established the necessary measures and governing procedures to control the preparation of, issuance of, and changes to documents that specify quality requirements or prescribe how activities affecting quality, including organizational interfaces, are controlled to ensure that correct documents are being employed.

6.1.1 The operation and use of the document control system (including electronic systems used to make documents available at points of use) is documented and provides for the following:

- Identification of internal and external documents to be controlled
- Identification of the correct document (including revision) to be used and control of superseded documents
- Distribution for use at the appropriate location
- Identification of assignment of responsibility for preparing, reviewing, approving, and issuing documents
- Review of documents for adequacy, completeness, legibility and correctness prior to approval and issuance
- A method for providing feedback from users to continually improve procedures and work instructions
- Coordinating and controlling interface documents and procedures

6.1.2 The types of documents to be controlled include, but are not limited to:

- a) Drawings such as design, construction, installation, and as-built drawings
- b) Engineering calculations
- c) Design specifications
- d) Purchase orders and related documents
- e) Vendor-supplied documents
- f) Audit, surveillance, and quality verification/inspection procedures
- g) Inspection and test reports
- h) Instructions and procedures for activities covered by this Quality Assurance Program Description (QAPD)
- i) Technical requirements
- j) Nonconformance reports

6.2 Review and Approval of Documents

6.2.1 Individuals other than the preparer review documents for adequacy, accuracy, and completeness.

6.2.2 Prior to issuance or use, the reviewed documents are approved. This review process is applied to all subsequent revisions.



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6.2.3 A listing of all controlled documents identifying the current approved revision, or date of approval, is maintained so personnel can readily determine the appropriate document for use.

6.3 Changes to Documents

6.3.1 Changes to documents, other than those defined in implementing procedures as minor changes, are reviewed and approved by the same organizations that performed the original review and approval unless other organizations are specifically designated.

6.3.2 The reviewing organization is given access to pertinent background data or information upon which to base their approval.

6.3.3 Minor changes to documents, such as inconsequential editorial corrections, do not require that the revised documents receive the same review and approval as the original documents.

6.3.4 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 classification will be clearly delineated in implementing procedures.

6.4 Temporary Documents

6.4.1 Temporary procedures include designation of the period of time during which it is valid to use them.

6.4.2 Temporary procedure changes are approved by two members of the staff knowledgeable in the areas affected by the procedures.

6.5 Commitment

In establishing procedural controls, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria VI, and NQA-1-2015 Edition, Requirement 6.



7.0 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

7.1 General

7.1.1 This section describes the GE Hitachi Nuclear Energy (GEH) program for ensuring that purchased items and services meet specified requirements. The program's systematic activities are performed to written procedures and include the following:

- Procurement document preparation, review, and change control according to the requirements of Section 4.0 of this QAPD
- Selection of procurement sources
- Proposal/bid evaluation and award
- Evaluation of GEH contractor/supplier performance
- Oversight including any hold and witness point notifications
- Control of nonconformances
- Corrective action
- Acceptance of an item or service
- Identification of Quality Assurance Records

7.1.2 GEH retains the responsibility for any outsourced processes that affect product or service conformity with requirements.

7.2 Supplier Evaluation and Selection

7.2.1 A supplier is selected based on a pre-qualification process performed by GEH before a contract or purchase order is awarded.

7.2.2 During the pre-qualification review, the supplier's capability to provide items or services in accordance with GEH Sourcing requirements is determined.

7.2.3 Measures for evaluating and selecting procurement sources are documented and include one or more of the following elements:

- An evaluation of the supplier's history for providing an identical or similar product that performs satisfactorily in actual use. This evaluation is required to reflect the supplier's current capability.
- An evaluation of the supplier's current quality assurance records. This evaluation must be supported by documented qualitative and quantitative information that can be objectively evaluated.
- An evaluation of the supplier's technical and quality capabilities, based upon a direct review and inspection of supplier's facilities and personnel, and the supplier's implementation of its quality assurance program.

7.2.4 Suppliers that meet the requirements are placed on the GEH Approved Supplier List (ASL) and are subject to periodic re-evaluation and assessments based on the established guidelines and requirements.



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7.3 Proposal/Bid Evaluation

- 7.3.1 The proposal/bid evaluation process is required to include a determination of the supplier's capability to conform to technical and quality assurance requirements.
- 7.3.2 Before the contract is awarded, GEH must resolve, or obtain commitments to resolve, unacceptable quality conditions identified during the proposal/bid evaluation.

7.4 Control of Supplier Generated Documents

- 7.4.1 Supplier generated documents are controlled, processed, and accepted in accordance with established methods.
- 7.4.2 These measures must provide for the acquisition (per procurement document requirements; reference Section 4 of this QAPD), processing, and recorded evaluation of technical, inspection, and test data compared against the acceptance criteria.
- 7.4.3 If GEH approval of supplier procedures is required, this approval is accomplished prior to the supplier's use.
- 7.4.4 Instructions are provided for the retention and disposition of quality assurance records that are to be retained by the supplier.

7.5 Control of Supplier Nonconformances

- 7.5.1 GEH and its suppliers establish and document methods for disposition of nonconforming items and services in their purchase agreements.
- 7.5.2 Suppliers are instructed to send GEH all nonconformance reports from procurement documentation requirements generated during the manufacturing process.
- 7.5.3 As a minimum, nonconformance reports are obligated to contain the following:
 - A description of the nonconforming item
 - An evaluation of the nonconforming item
 - At least one recommended corrective action
 - A technical justification for each corrective action identified
- 7.5.4 Nonconformances to the contractual procurement requirements or GEH approved documents are required to be submitted to GEH for approval of the recommended disposition prior to shipment when the nonconformance consists of one or more of the following:
 - A violation of technical or material requirements
 - A violation of a GEH-approved requirement in supplier documents
 - A nonconformance that cannot be corrected by continuation of the original manufacturing process or by rework (i.e., use-as-is)
 - An item that does not conform to the original requirement even though the item can be restored to a condition such that the capability of the item to function is unimpaired (i.e., repair)

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7.6 Acceptance of Items or Services

7.6.1 Suppliers are required to verify that furnished items or services comply with GEH procurement document requirements before offering the items or services for acceptance.

7.6.2 The extent of verification activities performed by GEH is a function of the relative importance, complexity and quantity of the items or services procured; and the supplier's past performance relative to quality.

7.6.3 Methods of Acceptance

GEH methods for accepting supplier-furnished items or services ensure that items or services comply with GEH procurement document requirements and include one or more of the following, as appropriate to the items or services being procured:

7.6.3.1 Certificate of Conformance

When a certificate of conformance is used to accept an item or related service the following are considered minimum requirements:

- The certificate identifies the purchased item or service to the specific procurement document.
- The certificate identifies the specific procurement document requirements met by the purchased item or service, such as codes, standards, and other specifications. The procurement document requirements identified include any approved changes, waivers, or deviations applicable to the item or service.
- The certificate identifies any procurement document requirements that have not been met, together with an explanation and the means for resolving the nonconformances.
- A person who is responsible for this quality function and whose responsibilities and position are described in the supplier's quality assurance program attests to the certificate.
- The certification process, including the implementing documents to be followed in filling out a certificate and the administrative implementing documents for review and approval of the certificates, are described in the GEH or supplier's implementing procedure.
- Measures are identified to verify the validity of certificates and the effectiveness of the certification process (i.e., by audit of the supplier or by an independent inspection or test of the item). GEH will conduct verifications at intervals commensurate with the past quality performance of the supplier.

7.6.3.2 Source Verification

7.6.3.2.1 GEH may accept an item or service by source verification such as monitoring, witnessing, or observing activities performed by the supplier.

7.6.3.2.2 Source verification is implemented at intervals consistent with the importance and complexity of the item or service.

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7.6.3.2.3 Source verification is planned and performed so that observations of specific activities at predetermined points can be accomplished and may include customer required involvement.

7.6.3.2.4 Documented evidence of acceptance of source verified items or services are retained by GEH and furnished to the receiving destination of the item and the supplier.

7.6.3.3 Receiving Inspection

7.6.3.3.1 When receiving inspection is used, items are verified by objective evidence, which includes such features as:

- a) Item configuration
- b) Item identification
- c) Item dimensional, physical or other characteristics
- d) Whether or not the item is free from shipping damage
- e) Item cleanliness

7.6.3.3.2 Receiving inspection is coordinated with a review of supplier documentation.

7.6.3.4 Post-installation Testing

When post-installation testing is used, test requirements and acceptance criteria are mutually established by GEH and the customer.

7.6.3.5 Acceptance of Services

In cases involving procurement of services only, such as third-party inspection, engineering and consulting services, auditing, installation, repair, overhaul, or maintenance work, GEH accepts the service by any or all of the following methods:

- a) A technical review of the data produced
- b) A surveillance and/or audit of the activity
- c) A review of any objective evidence for conformance to the procurement document requirements

7.7 Supplier Performance Evaluation

7.7.1 GEH, as a purchaser of items and services, establishes measures to interface with its suppliers to verify their performance.

7.7.2 These measures include any of the following:

- Establishing an understanding between GEH and the supplier regarding the requirements and specifications identified in the procurement documents
- Requiring the supplier to identify planning techniques and processes to be used in fulfilling procurement document requirements
- Reviewing supplier documents that are prepared or processed during work performed to fulfill procurement document requirements
- Identifying and processing necessary change information
- Establishing the method to be used to document information exchanges between GEH and the particular supplier



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- Establishing the extent of source surveillance and inspection
- Determining any additional or modified design criteria
- Analyzing exceptions or changes requested or specified by the supplier and determining the effects that such changes may have on the intent of the procurement documents or quality of the item or service furnished
- Ensuring that GEH verification activities do not relieve the supplier of its responsibilities for verification of quality achievement

7.7.3 If there is no ongoing receipt inspection or operating experience with which to analyze the supplier for a period of twelve months, an annual evaluation is performed as follows:

- Review of supplier-furnished documents and records such as certificates of conformance, nonconforming notices, and corrective actions
- Results of previous source verifications, audits, and receiving inspections
- Operating experience of identical or similar products furnished by the same supplier
- Results of audits from other sources (e.g., customer, ASME, or NRC audits)

7.8 Commercial Grade Items and Services - Dedication

7.8.1 Utilization of commercial grade items or services is permitted if controls are in place to provide reasonable assurance that the item or service will perform its intended safety function.

7.8.2 Such controls include, but are not limited to the following:

- a) A determination that the item or service performs a safety function
- b) Confirmation that the item or service meets the applicable commercial grade item definitions
- c) Identification and documentation of the critical characteristics, including acceptance criteria
- d) Selection, performance (inspection/test/survey/surveillance), acceptance, and documentation of the dedication methods for determining compliance with the critical characteristic acceptance criteria

7.8.3 The commercial grade item or service dedication process will be controlled via documented procedures and retention of objective evidence.

7.9 Records

Records are maintained to indicate the performance of the following functions:

- a) Supplier evaluation and selection
- b) Acceptance of the items or services procured
- c) Supplier nonconformances to procurement document requirements, including a description of their evaluation and disposition

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7.10 Commitment

7.10.1 In establishing a program for the control of items and services, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria VII and NQA-1-2015 Edition, Requirement 7 with the following exceptions:

- GEH considers 10 CFR Part 50 licensees, Authorized Nuclear Inspection Agencies, National Institute of Standards and Technology, or other State and Federal agencies, which may provide items or services to GEH, as not requiring evaluation or audit.
- When purchasing commercial grade calibration or testing services from a laboratory holding accreditation by an accrediting body recognized by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement, commercial grade surveys and source verifications need not be performed provided each of the following conditions are met:
 - A documented review of the supplier's accreditation will be performed and will include a verification of each of the following:
 - The calibration or test laboratory is accredited to ISO/IEC 17025:2017 or 2005 "General Requirements for the Competence of Testing and Calibration Laboratories" by an accreditation body that is a signatory to the ILAC Mutual Recognition Arrangement per NEI 14-05A as endorsed by the US NRC.
 - For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the necessary measurement parameters, ranges, and uncertainties.
 - For procurement of testing services, the published scope of accreditation for the test laboratory covers the necessary testing services including test methodology and tolerances/uncertainty.
 - The purchase documents require the following:
 - The service must be provided in accordance with the supplier's accredited ISO/IEC-17025:2017 or 2005 program and scope of accreditation.
 - The reporting of as-found calibration data in the certificate of calibration when calibrated items are found to be out-of-tolerance.
 - The certificate of calibration includes identification of the laboratory equipment and standards used to perform the calibration.
 - The supplier is to notify GEH of any condition that adversely impacts the laboratory's ability to maintain the scope of accreditation.
 - Impose any additional technical and administrative requirements, as necessary, to comply with the GEH QA program and technical provisions, which may include but are not necessarily limited to, tolerances, accuracies, ranges, and industry standards.
 - At receipt inspection, GEH shall validate the following:
 - The contracted calibration or testing service has been performed in accordance with the supplier's ISO/IEC-17025:2017 or 2005 program, and has been performed within the laboratory's scope of accreditation, and
 - The purchase order's requirements are met.



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7.10.2 In establishing a program for dedication of commercial-grade items GEH commits to compliance with NQA-1-2015, Subpart 2.14.



8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

8.1 General

GE Hitachi Nuclear Energy (GEH) has established a program to provide for the identification and control of materials, parts, and components (partially fabricated assemblies, consumables, and limited shelf life items).

- 8.1.1** Integral to the program are measures for preventing the use, shipment, or installation of incorrect or unacceptable items.
- 8.1.2** The program provides for the identification of each item that is established and maintained throughout fabrication, erection, installation, and use so the item can be traced to its documentation.
- 8.1.3** The identification and control measures provide for relating an item or product (batch, lot, part, or assembly) at any stage, from material receipt through fabrication and shipment to an applicable design drawing, specification, or other pertinent control document.
- 8.1.4** When required by codes, standards, contract or specifications, traceability will be maintained to specific material certifications, test reports, heat numbers, heat treatment lot numbers, or other attributes.

8.2 Identification Methods

- 8.2.1** Procedures related to material and equipment traceability requirements are used to assure product identification and traceability.
- 8.2.2** Item identification is maintained through the life of the product, component, part, or item so marked.
- 8.2.3** This identification is accomplished using heat numbers, part numbers, serial numbers, or other appropriate means; and is located either on the item or on records traceable to the item.
- 8.2.4** Items in the production stream, whether they are batch, lot, component, or part items, are identified from initial receipt from the supplier through fabrication, delivery, installation, and use.
- 8.2.5** The identification corresponds to a listing or other specifying process that relates the product, component, or part to the product delivered.

8.3 Preference for Physical Marking

- 8.3.1** Where practical, physical identification is given preference to other forms of identification.
- 8.3.2** When physical identification is neither practical nor sufficient, physical separation, procedural control, or other appropriate means will be used.

8.4 Maintenance of Marking

- 8.4.1** Markings will be transferred to each part of an item when subdivided and will not be obliterated or hidden by surface treatment or coatings unless other means of maintaining identification are utilized.



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8.4.2 Where identification marking of an item is employed, the marking will be clear, unambiguous and indelible, and will be applied in such a manner as not to affect the function or quality of the item.

8.4.3 Measures to maintain or replace identification markings will be based on the expected length of time in storage and environmental conditions so that they are not obliterated due to handling, aging, or deterioration.

8.5 Limited Life Items

Measures are established to track the age of limited shelf life items so that they cannot be used after the established lifetime has expired. Provisions are made for updating inventory records.

8.6 Commitment

In establishing provisions for identification and control of items, GEH commits to compliance with 10 CFR Part 50 Appendix B Criteria VIII and NQA-1-2015 Edition, Requirement 8.



9.0 CONTROL OF SPECIAL PROCESSES

9.1 General

The GE Hitachi Nuclear Energy (GEH) program ensures that special processes such as welding, heat treating, and nondestructive examination are properly controlled.

- 9.1.1** Special processes are accomplished by personnel qualified under associated codes, standards, regulations, specifications, design criteria and other special requirements.
- 9.1.2** Special processes are conducted in accordance with the applicable codes, standards, regulations, specifications, design criteria and other special requirements, procedures, and equipment.
- 9.1.3** Control is accomplished through the use of instructions, procedures, drawings, checklists, or other appropriate means within established parameters and is maintained under specified environmental conditions.
- 9.1.4** Each special process work instruction will include, or reference, procedures, personnel, and equipment qualification and calibration requirements appropriate to that particular process.

9.2 Criteria

A process is designated “special” if the success of the process is highly dependent on the control of the process or the skill of the operators, or both, and if the specified quality cannot be readily determined by inspection or test of the product.

9.3 Non-Standard Processes

For special processes not covered by existing codes or standards, or where product requirements exceed those of established codes or standards, the necessary requirements for the qualification of personnel, procedures, or equipment are defined or referenced in procedures or work instructions.

9.4 Responsibility

The organization performing the special process is responsible for adherence to the approved procedures and processes.

9.5 Records

Records are maintained, as appropriate for the qualified personnel, processes, and equipment, and their revalidation, for each special process.

9.6 Commitment

In establishing measures for the control of special processes, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria IX and NQA-1-2015 Edition, Requirement 9.



10.0 INSPECTION

10.1 General

This section describes the GE Hitachi Nuclear Energy (GEH) program for inspection of items and activities to verify conformance to requirements and adherence to documented instructions, procedures, and drawings.

10.1.1 Inspection types include, but are not limited to:

- source,
- in process,
- final,
- receipt,
- maintenance,
- modification,
- in-service, and
- operations

10.1.2 Inspection results are documented by the inspector, reviewed by authorized personnel qualified to evaluate the technical adequacy of the inspection results, and controlled by instructions, procedures, and drawings.

10.1.3 Appropriately controlled measuring and test equipment (reference Section 12.0 of this QAPD) shall be used in the performance of the inspections.

10.2 Inspection Personnel

10.2.1 Inspections are performed by independent personnel who have not performed the work and do not report to the supervisors responsible for the work being inspected.

10.2.2 Those activities that require qualified inspection personnel are defined per implementing procedures or instructions.

10.3 Planning

10.3.1 Provisions are incorporated into inspection work instructions to ensure inspection planning is properly accomplished to assure quality of product or service.

10.3.2 Planning activities identify the characteristics and activities inspected, sample size, inspection methods, acceptance criteria, and organization responsible for performing the inspection.

10.3.3 Inspection requirements and acceptance criteria include requirements specified in the applicable design documents or in other pertinent technical documents approved by the responsible design organization.

10.3.4 Examinations, measurements, or tests of material or products processed are performed for each work operation where necessary to ensure quality.

10.3.5 Inspections and tests are utilized to ensure control of special processes as designated in applicable test and inspection procedures.

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10.3.6 Sampling

If sampling procedures are used, they are based on standard statistical methods or industry practices with either engineering or quality approval.

10.3.7 Hold Points

10.3.7.1 Mandatory inspection hold points that require documented consent of the designated representative prior to the work proceeding are specified in appropriate documents.

10.3.7.2 Consent to waive specified hold points is recorded prior to continuation of work beyond the designated hold point.

10.3.8 Process Monitoring

10.3.8.1 If inspection of processed material or products is impossible or disadvantageous, indirect control by monitoring process methods, equipment, and personnel are provided.

10.3.8.2 Both inspection and process monitoring are provided when control is inadequate without both.

10.3.8.3 When used in the monitoring and measurement of specified requirements, the ability of computer software to satisfy the intended application is confirmed. This is completed prior to initial use and reconfirmed as necessary.

10.3.9 Re-inspection

Modifications, repairs, or replacements of items performed after final inspection require re-inspection or retest, as appropriate, to verify acceptability.

10.4 Final Inspection**10.4.1 Resolution of Nonconformances**

A records review of the results and resolution of nonconformances identified by prior inspections will be included as part of the final inspection.

10.4.2 Inspection Requirements

The GEH final inspection requirements include verification of the following: completeness of the product or service, markings, calibration, adjustments, protection from damage, or other characteristics, as required, to verify the quality and conformance of the item to the specified requirements.

10.4.3 Acceptance

10.4.3.1 Only authorized personnel are permitted to accept the work being inspected.

10.4.3.2 Release of product to ship is authorized by issuing a Product Quality Certificate.

10.5 Records

Appropriate records are established, maintained, and include the following as a minimum:

- a) Item inspected



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- b) The date of the inspection
- c) The name of the inspector
- d) The type of observation
- e) The acceptability of the result
- f) One or more references to information on any action taken in connection with nonconformances

10.6 Commitment

In establishing inspection requirements, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria X and NQA-1-2015 Edition, Requirement 10.



11.0 TEST CONTROL

11.1 General

- 11.1.1** This section establishes the GE Hitachi Nuclear Energy (GEH) program to control testing, to collect data such as for design input or to verify conformance of an item to specified requirements, or to demonstrate satisfactory performance for service.
- 11.1.2** Characteristics to be tested and test methods to be employed are specified.
- 11.1.3** The test program includes proof tests before installation, preoperational tests, post maintenance tests, post modification tests, and operational tests as appropriate.
- 11.1.4** Test results are documented and their conformance with the test requirements and the acceptance criteria are evaluated.

11.2 Test Requirements

- 11.2.1** Test requirements and acceptance criteria are provided in an applicable design, or other pertinent technical document, and are approved by the responsible design organization.
- 11.2.2** Criteria are defined that specify when testing is required and activities that require qualified test personnel.
- 11.2.3** Required tests are controlled under appropriate environmental conditions using the tools and equipment, including appropriately controlled measuring and test equipment (reference Section 12.0 of this QAPD), necessary to conduct the test in a manner to fulfill test requirements and acceptance criteria.
- 11.2.4** The tests performed obtain the necessary data with sufficient accuracy for evaluation and acceptance.
- 11.2.5** If temporary changes to the approved configuration of a facility are required for testing purposes, approval by the responsible design organization is required prior to performing the test.
- 11.2.6** Acceptance testing of computer programs demonstrates, as appropriate, that the computer program properly handles abnormal conditions and events as well as credible failures; does not perform adverse unintended functions; and does not degrade the system either by itself or in combination with other functions or configuration items
- 11.2.7** Acceptance testing of changes to computer programs is subjected to selective retesting to detect unintended adverse effects introduced during the change and to verify that a modified system(s) or system component(s) still meets specified software design requirements.

11.3 Test Procedures

11.3.1 Test Procedures

- 11.3.1.1** Test procedures include or reference the test configuration and test objectives.

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11.3.1.2 Test procedures also include provisions for assuring that prerequisites and suitable environmental conditions are met, adequate instrumentation is available and used, appropriate tests and equipment are used, and necessary monitoring is performed.

11.3.1.3 Prerequisites include the following, as applicable:

- a) The test instrumentation must be properly calibrated
- b) The appropriate equipment must be used
- c) The test must be conducted by personnel who are trained in the procedures
- d) The condition of the test equipment and the item to be tested must meet test specifications
- e) Suitable environmental conditions must exist in the test location
- f) The provisions for data acquisition must be working and in good order

11.3.1.4 Alternately, appropriate sections of related documents, such as ASTM methods, Supplier manuals, equipment maintenance instructions, or approved drawings or travelers with acceptance criteria, may be used. Such documents include or are supplemented with appropriate criteria listed above to ensure adequate procedures for the test.

11.4 Test Results

11.4.1 Test results are documented and evaluated by a responsible authority to ensure that test requirements have been satisfied.

11.4.2 Test results for design qualification tests are evaluated by the responsible design organization.

11.5 Test Records

11.5.1 Test records are established and maintained to indicate the ability of the item or computer program to satisfactorily perform its intended function or to meet its documented requirements.

11.5.2 Test records vary depending on the test type, purpose, and application, but contain the following information, as a minimum:

- a) The item tested
- b) The date of the test
- c) The name of the tester or data recorder
- d) The type of observation required
- e) The results and acceptability of those results
- f) Any action taken in connection with deviations from the original testing specification or procedure
- g) The name of the person evaluating test results



11.6 Commitment

In establishing test control requirements, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria XI and NQA-1-2015 Edition, Requirement 11. In establishing requirements for computer program test procedures and test records, GEH commits to compliance with NQA-1-2015 Subpart 2.7.



12.0 CONTROL OF MEASURING AND TEST EQUIPMENT

12.1 General

- 12.1.1** GE Hitachi Nuclear Energy (GEH) has established a program, including governing procedures, to control the calibration, maintenance, storage, and use of Measuring and Test Equipment (M&TE).
- 12.1.2** The procedures cover equipment such as indicating and actuating instruments and gages, tools, reference and transfer standards, and nondestructive examination equipment.
- 12.1.3** The suppliers of commercial-grade calibration services are evaluated for compliance with the control measures as described in Section 7 of this QAPD.
- 12.1.4** Calibration and control measures are not required for commercial equipment such as rulers, tape measures, levels, etc., if such equipment provides the required accuracy.
- 12.1.5** M&TE is properly handled and stored to maintain accuracy.

12.2 Selection of Equipment for Use

- 12.2.1** Selection of M&TE is based on the type, range, accuracy, and tolerance needed to accomplish the required measurements for determining conformance to specified requirements.
- 12.2.2** The utilization of M&TE is traceable to their application and use.

12.3 Calibration Process

- 12.3.1** M&TE are calibrated at prescribed intervals, or whenever the accuracy of the M&TE is suspect, or prior to use.
- 12.3.2** Calibration is conducted against certified equipment or reference standards having known valid relationships to nationally recognized standards, or to international standards which are known to be equivalent to and verified against corresponding nationally recognized standards. The program requires that traceability to the reference standards be maintained. Where no such standards exist, the basis for calibration or verification is documented.
- 12.3.3** M&TE is safeguarded from adjustments that would invalidate the measurement result.
- 12.3.4** M&TE is protected from damage and deterioration during handling, maintenance and storage.
- 12.3.5** Calibration tolerance relative to the accuracy of reference standards used and the M&TE calibrated shall be addressed in calibration documentation. When tolerance ratios become close, the basis for the selection of the specific reference standard shall be technically justified.

12.4 Control of Calibration Status

- 12.4.1** M&TE are suitably marked, tagged, labeled, or otherwise identified to indicate calibration status and establish traceability to calibration records.
- 12.4.2** M&TE that is overdue for calibration or found to be out-of-calibration is tagged and/or segregated, removed from service, and not used until it has been recalibrated.
- 12.4.3** M&TE consistently found to be out-of- calibration will be repaired or replaced.

**12.5 Records****12.5.1 General**

Records are established and maintained to indicate calibration status and the capability of M&TE to satisfactorily perform its intended function.

12.5.2 Reports and Certificates

Calibration reports and certificates reporting the results of calibrations include the information and data necessary for interpretation of the calibration results and verification of conformance to applicable requirements.

12.5.3 Out of Calibration

12.5.3.1 When M&TE is lost, damaged or found out-of-calibration, the validity of previous measurements, inspections, or test results, and the acceptability of items previously inspected or tested from the last acceptable calibration shall be evaluated.

12.5.3.2 The responsible quality organization assesses and records the validity of the previous measuring results.

12.5.3.3 Appropriate action is taken on the equipment and any product affected.

12.6 Commitment

In establishing a M&TE calibration program, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria XII and NQA-1-2015 Edition, Requirement 12.



13.0 HANDLING, STORAGE, AND SHIPPING

13.1 General

- 13.1.1** GE Hitachi Nuclear Energy (GEH) has established a program to control the handling, storage, packaging, cleaning, shipping, and preservation of items to prevent inadvertent damage or loss, and to minimize deterioration.
- 13.1.2** Customer supplied material is controlled to ensure that the material is received, inspected, stored, and maintained in a controlled environment; and that any customer supplied material that is lost, damaged, or is otherwise unsuitable for use be reported to the customer.
- 13.1.3** The design of packaging and shipping containers is procedurally controlled by packaging related procedures for GEH Procured or Manufactured Items.

13.2 Instructions

Cleaning, handling, storing, packaging, shipping, and preservation of items are controlled by written instructions, drawings, specifications or other pertinent documents. Sufficient labeling is provided to identify the items and to indicate any special conditions needed to prevent degradation.

13.3 Special Controls

- 13.3.1** Special controls (such as containers, shock absorbers, and accelerometers) and environments (such as inert gas atmospheres, specific moisture content levels, and temperature levels) are provided and verified when required to maintain acceptable quality.
- 13.3.2** The presence of these special environments is indicated by marking the exterior of the container to prevent premature penetration of the sealing boundary.
- 13.3.3** The need for special controls or specific procedures is established on a case by case basis according to the item's complexity, use, and sensitivity to damage. Consideration for critical, sensitive, perishable or high-value items should be incorporated in controls and procedures.

13.4 Special Tools and Equipment

- 13.4.1** Special handling tools and equipment will be used and controlled as necessary to ensure safe and adequate handling.
- 13.4.2** Special handling tools and equipment will be inspected and tested at specified time intervals, or prior to use, and in accordance with procedures to verify that the tools and equipment are adequately maintained.

13.5 Operators

Operators of special handling and lifting equipment will be experienced or trained in the use of the equipment.

13.6 Commitment

In establishing provisions for handling, storage, and shipping, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria XIII and NQA-1-2015 Edition, Requirement 13.

**14.0 INSPECTION, TEST, AND OPERATING STATUS****14.1 General**

GE Hitachi Nuclear Energy (GEH) has established a program to identify the inspection and test status of individual items and for indicating the operating status of equipment, such as valves and switches. Implementing procedures specify the authority for the application and removal of these status indicators.

14.2 Inspection and Test Status

14.2.1 Inspection and test status indicators provide assurance that items that have not successfully passed required inspections and/or tests are not inadvertently installed, used, operated, or released for subsequent operations or shipment.

14.2.2 The inspection and test status is maintained through the use of physical location, status indicators (such as tags, markings, shop travelers, stamps, or inspection records), or other suitable means.

14.3 Commitment

In establishing measures for control of inspection, test, and operating status, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria XIV and NQA-1-2015 Edition, Requirement 14.



15.0 NONCONFORMING MATERIAL OR COMPONENTS

15.1 General

- 15.1.1** GE Hitachi Nuclear Energy (GEH) has established a program to control nonconforming items and to prevent inadvertent installation or use.
- 15.1.2** Nonconforming items have a deficiency in characteristic, documentation, or procedure that makes the quality of the item or activity unacceptable or indeterminate.
- 15.1.3** Controls provide for identification, documentation, evaluation, segregation (when practical), disposition of nonconforming items, and for notification to affected organizations.

15.2 Identification and Control

- 15.2.1** Nonconforming items are identified by legible marking, tagging, or other methods not detrimental to the item, on the item, the container, or the package containing the item.
- 15.2.2** Nonconforming items that are segregated are placed in a clearly identified and designated hold area until they can be properly dispositioned.
- 15.2.3** When segregation is impractical or impossible due to physical conditions, such as size, weight, or access limitations, other administrative measures are employed to preclude inadvertent use of a nonconforming item.
- 15.2.4** Further processing, delivery, installation, or use of a nonconforming item is administratively controlled until an evaluation of the item is completed by authorized personnel and the appropriate disposition for that item is determined.

15.3 Disposition

- 15.3.1** The responsibility and authority for the evaluation and disposition of nonconforming items is defined in implementing procedures.
- 15.3.2** Responsibility for the control of further processing, delivery, installation, or use of nonconforming items is designated in writing.
- 15.3.3** Personnel performing evaluations to determine a disposition must have the following qualifications:
 - a) Demonstrated competence in the specific area they are evaluating
 - b) Possess an adequate understanding of the requirements
 - c) Access to pertinent background information
- 15.3.4** Dispositions can include:
 - Rework – the process by which an item is made to conform to original requirements by completion or correction.
 - Repair – the process of restoring a nonconforming characteristic to a condition such that the capability of an item to function reliably and safely is unimpaired, even though that item still does not conform to the original requirement.

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- Use-as-is – a disposition permitted for a nonconforming item when it has been established that the item is satisfactory for its intended use.
- Reject – the item is unsuitable for use and is to be designated as scrap or returned to the vendor.

15.3.5 Technical justification for the acceptability of a nonconforming item dispositioned in either the repair or use-as-is categories must be documented.

15.3.6 Nonconformances to design requirements dispositioned use-as-is or repair are subject to design control measures commensurate with those applied to the original design.

15.3.7 Required as-built records reflect the use-as-is or repair condition.

15.3.8 When required by contract, the proposed disposition is submitted to the Customer for approval prior to acceptance for delivery.

15.3.9 Each nonconformance is reviewed to determine if such nonconformity may exist in the delivered products. If there is a concern that a nonconformance could lead to creation of a substantial safety hazard, a request to initiate an evaluation is made in accordance with the Corrective Action Program for Reporting of Defects and Noncompliance Under 10 CFR Part 21.

15.4 Re-examination

15.4.1 Reworked, repaired, or replacement items are re-examined in accordance with applicable procedures and with the original acceptance criteria, unless otherwise stipulated.

15.4.2 Repaired items may use alternate acceptance criteria if the need is established during the repair plan design review.

15.5 Commitment

GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria XV and NQA-1-2015 Edition, Requirement 15.

**16.0 CORRECTIVE ACTION PROGRAM****16.1 General**

- 16.1.1** The GEH Corrective Action Program utilizes a system of implementing procedures to establish the necessary measures to promptly identify, control, document, classify, and correct Conditions Adverse to Quality (CAQs).
- 16.1.2** The GEH implementing procedures ensure that appropriate actions are initiated following the determination of CAQs in accordance with regulatory requirements and applicable quality standards.
- 16.1.3** These measures ensure that corrective actions are adequately documented and not inadvertently nullified by subsequent actions. Completion of corrective actions shall be confirmed.
- 16.1.4** GEH implementing procedures require personnel to identify known CAQs.
- 16.1.5** When complex issues arise, such that an immediate determination of whether a CAQ exists cannot be made, the GEH Corrective Action Program identifies a process for the documentation and timely evaluation of the issue.
- 16.1.6** If there is a concern that a CAQ that could result in a substantial safety hazard, a safety evaluation is requested in accordance with the Corrective Action Program for Reporting of Defects and Noncompliance Under 10 CFR Part 21.
- 16.1.7** A Significant Condition Adverse to Quality (SCAQ) is a failure, malfunction, deficiency, defective item, or nonconformance that, if uncorrected, could have a serious effect on safety or operability. SCAQs are documented and reported to responsible management. Their cause is determined and actions to preclude their recurrence are taken.
- 16.1.8** Implementing procedures for the Corrective Action Program are used to ensure that:
- All corrective actions from audits and self-assessments, all nonconformances, and customer complaints are analyzed to detect conditions or potential CAQs.
 - Changes in processes or procedures resulting from corrective and preventive actions are implemented and recorded.
- 16.1.9** The Corrective Action Program and related tools are utilized to document, track status, and maintain records of corrective and preventive action activities and results.
- 16.1.10** Warranty service and customer complaint related procedures are used to ensure that customer complaints are documented, dispositioned and resolved.

16.2 Identification of Trends

- 16.2.1** Reports of conditions that are adverse to quality are analyzed to identify trends in quality performance.
- 16.2.2** Significant conditions and trends adverse to quality are reported to the appropriate level of management.



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16.3 Corrective Action

16.3.1 Appropriate corrective actions are taken to resolve CAQs observed during internal or external audits.

16.3.2 Implementing procedures define the requirements for:

- Reviewing CAQs and determining their severity level
- Determining the root causes and their effects and extents
- Evaluating the need for action to avoid recurrence
- Determining and implementing corrective action needed
- Reviewing corrective actions taken

16.4 Preventive Action

16.4.1 GEH identifies actions to eliminate the causes of SCAQs in order to prevent their reoccurrence. Preventive actions are taken as appropriate to address the causes of the problems.

16.5 Commitment

In establishing corrective action requirements, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria XVI and NQA-1-2015 Edition, Requirement 16.

17.0 QUALITY ASSURANCE RECORDS

17.1 General

- 17.1.1** GE Hitachi Nuclear Energy (GEH) has established measures to provide provisions for the identification, administration, receipt, storage, preservation, safekeeping, retrieval, and disposition of all records such that damage or loss does not occur.
- 17.1.2** Quality records are established to provide objective evidence of conformance to requirements and effective implementation of the GEH quality management system.
- 17.1.3** The records system is defined, implemented, and enforced in accordance with written procedures, instructions, or other documentation.
- 17.1.4** The applicable design specifications, procurement documents, test procedures, operational procedures, or other documents specify the records generated, supplied, and maintained. Records shall be traceable to associated items and activities, and accurately reflect the work accomplished or information required.
- 17.1.5** Records may be hard copy, electronic, or both.
- 17.1.6** Records shall be examined for adequacy, legibility, and completeness.
- 17.1.7** Safekeeping of records includes access control and protection from equipment malfunction.
- 17.1.8** Records shall remain legible, readily identifiable and retrievable, even after hardware, software or technology changes.

17.2 Administration

17.2.1 Personnel

- 17.2.1.1** Requirements and responsibilities for record transmittal, receipt, location, distribution, retention, maintenance, and disposition are described in implementing procedures.
- 17.2.1.2** Training is provided for individuals or organizations in charge of the generation of electronic records, data and media storage, the implementation of security measures, the migration of data, the regeneration of data, and the recovery of data.

17.2.2 Indexing System

An indexing system provides sufficient information to permit identification between the record and the item, or activity, to which it applies. Record controls shall provide for retrievability within planned retrieval times based on the record classification, type or content.

17.2.3 Corrections

- 17.2.3.1** Records are corrected or changed in accordance with procedures that provide for appropriate review or approval by the originating organization.



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17.2.3.2 The correction or change includes the date and the identification of the person authorized to issue such correction or change.

17.3 Classification

Records are classified as Lifetime or Nonpermanent.

17.3.1 Lifetime Records

17.3.1.1 Lifetime records are those that meet one or more of the following criteria:

- a) Significant value in demonstrating capability for safe operation
- b) Significant value in maintaining, reworking, repairing, replacing, or modifying an item
- c) Significant value in determining the cause of an accident or malfunction of an item
- d) Provision of required baseline data for in-service inspections and in-service tests

17.3.1.2 Lifetime records are maintained for the life of the particular item while it is installed in the plant or stored for future use.

17.3.2 Nonpermanent Records

17.3.2.1 Nonpermanent records are those required to show evidence that an activity was performed in accordance with the applicable requirements but need not be retained for the life of the item because they do not meet the criteria for lifetime records.

17.3.2.2 The retention period for nonpermanent records is established in implementing procedures.

17.4 Receipt Control

17.4.1 The person or organization responsible for receiving the records is designated.

17.4.2 This designee is responsible for organizing and implementing a system of receipt control of records for permanent and temporary storage, and for providing protection from damage or loss during the time that the records are in their possession.

17.4.3 At a minimum, a receipt control system includes the following:

- a) a method for designating the required records;
- b) a method for identifying records received;
- c) procedures for receipt and inspection of incoming records; and
- d) a method for submittal of completed records to the storage facility without unnecessary delay.

17.4.4 Each receipt control system is structured to permit a current and accurate assessment of the status of records during the receiving process.

17.5 Authentication

17.5.1 Documents are considered valid records only if stamped, initialed, authenticated, or signed and dated by authorized personnel.

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17.5.2 This authentication may take the form of a statement by the responsible individual or organization.

17.5.3 Handwritten signatures are not required if the document is clearly identified as a statement by the reporting individual or organization. These records may be originals or reproduced copies.

17.6 Storage**17.6.1 General**

17.6.1.1 Records will be stored at a predetermined location in facilities, containers, or a combination thereof, constructed and maintained in a manner that minimizes the risk of loss, damage, or destruction from:

- Natural disasters such as winds, floods, or fires
- Environmental conditions such as high and low temperatures and humidity
- Infestation of insects, mold, or rodents
- Dust or airborne particles

17.6.1.2 Activities that may be detrimental to the records are prohibited in the designated storage area.

17.6.1.3 Access to the processing, storage, and retrieval of records is limited to authorized personnel.

17.6.1.4 Provisions have been made to prevent damage from harmful conditions (such as excessive light, stacking, electromagnetic fields, temperature, and humidity), as applicable to the specific media utilized for record storage.

17.6.2 Facility Types

GEH uses two methods of providing storage - single and dual.

17.6.2.1 Single storage consists of a storage facility, vault, room, or containers with a minimum two-hour fire rating.

17.6.2.2 The design and construction of a single storage facility, vault, room, or container will be reviewed for adequacy by a person competent in fire protection or contain a certification or rating from an accredited organization.

17.6.2.3 Dual facilities, containers, or a combination thereof are located at facilities that are sufficiently remote from each other to eliminate the chance exposure to a simultaneous hazard. The requirements of Section 17.6.1 shall apply to both facilities.

17.6.3 Temporary Storage

When temporary storage of reviewed and approved records (such as for processing, review, or use) is required, the storage facility or container will provide a one-hour fire rating, unless dual storage requirements are met.



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17.6.4 Retention

17.6.4.1 Integral to the GEH records storage program is an implementing procedure that records retention periods.

17.6.4.2 This procedure notifies personnel of record retention requirements and helps to ensure that records are maintained for their retention periods.

17.6.5 Duplication/Transfer

Provisions are established to ensure that when records are duplicated or transferred to the same media or different media for the purpose of maintenance or storage, that the duplication or transfer is appropriately authorized, and that record content, legibility and retrievability are maintained.

17.7 Electronic Records

17.7.1 For Quality Assurance Records in electronic media, the GEH program includes controlling procedures with provisions for the generation, distribution, use, maintenance, storage, and disposition of electronic records.

17.7.2 The procedures identify the acceptable media on which electronic records may be created and stored. Also, the procedures include provisions to verify that the media is appropriate, suitable for the capture or storage of records, and error/defect free.

17.7.3 Electronic documents shall be authenticated with appropriate information on the media or with the information contained within or linked to the document itself.

17.7.4 Indexing

Electronic documents shall be indexed with appropriate information including necessary fields (metadata) as necessary to retrieve the record.

17.7.5 Corrections

A new record is to be generated when substantial corrections or changes to previous electronic records are required.

17.7.6 Retention

17.7.6.1 Electronic records are subject to the same retention requirements as paper records.

17.7.6.2 Retention requirements for electronic records also identify and maintain the information system (software/hardware), the documentation that describes the information system operation and use, and the record standard it produces.

17.7.7 Receipt

The person or organization responsible for receiving the records is also responsible for organizing and implementing an inventory of system applications, record formats, and programs required to process and retrieve electronic records.

**17.7.8 Authentication**

- 17.7.8.1** For electronic records, authentication is accomplished by manually affixing a seal, signature, an electronic representation (user ID/password combination and digital signature) or other acceptable process control that ensures genuineness, validity, or reliability.
- 17.7.8.2** Authorized personnel with access to electronic records and information systems should have a unique user ID/password for access.
- 17.7.8.3** The system should provide controls for users who enter or alter information in electronic records to ensure its data integrity and prevent unauthorized alteration or erasure.
- 17.7.8.4** Transfer of authentication authority is documented and controlled in accordance with written procedures.

17.7.9 Storage

- 17.7.9.1** Electronic media should be stored in a dust-free environment and away from electronic devices and demagnetizing equipment such that no unacceptable degradation of the media occurs during the established retention period.
- 17.7.9.2** Media should be maintained at a constant temperature between 40 to 80 degrees Fahrenheit (4.4 to 26.7 degrees Celsius), and a relative humidity between 30 to 50 percent.
- 17.7.9.3** Magnetic and optical media should be tested periodically to identify any loss of data, to ensure that they are free of permanent errors, and that the record system hardware/software still supports the retrieval of the records.

17.7.10 Obsolescence

- 17.7.10.1** An electronic record migration/regeneration program is implemented for electronic records stored in media with a standard life expectancy that fails to meet the specific retention period.
- 17.7.10.2** This program is implemented in accordance with documented procedures that provide for appropriate record authentication, quality verification of the completion, and accuracy of the data transferred.

17.8 Commitment

In establishing a quality assurance records program, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria XVII, NQA-1-2015 Edition, Requirement 17, US NRC Regulatory Guide (RG) 1.28, Revision 5, October 2017.



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18.0 AUDITS

18.1 General

- 18.1.1 The GE Hitachi Nuclear Energy (GEH) audit program is designed to verify compliance to quality assurance program requirements, to verify that performance criteria are met, to determine the effectiveness of the program, and to provide a comprehensive independent evaluation of activities and procedures.
- 18.1.2 Audits are performed in accordance with written procedures or checklists by qualified personnel who do not have direct responsibility for performing the activities being audited.
- 18.1.3 Audit results are documented and reviewed by responsible management.
- 18.1.4 Follow-up action is taken where indicated.
- 18.1.5 If work under this QAPD is delegated to others, then the work is to be audited by GEH in accordance with this QAPD.

18.2 Personnel

- 18.2.1 An audit team is identified prior to the beginning of each audit. This team contains one or more auditors; and is led by a lead auditor.
- 18.2.2 The lead auditor organizes and directs the audit and verifies that the audit team has the necessary experience or training commensurate with the scope, complexity, or special nature of the activities to be audited.
- 18.2.3 Audit personnel are given sufficient authority and organizational freedom to make the audit process meaningful and effective.
- 18.2.4 Audit personnel shall not assess their own work.

18.3 Audit Scheduling, Planning and Performance

18.3.1 Annual Audit Schedule

- 18.3.1.1 An audit schedule is documented at the beginning of each year to document the planned, periodic coverage of internal functions performing quality related activities, commensurate with the status and importance of the activity, and the performance of suppliers.
- 18.3.1.2 Audits are scheduled for internal activities at the following intervals:
 - a) Prior to placing a licensed facility into operation – All applicable quality assurance program elements are audited at least once each year or at least once during the life of the activity, whichever is shorter.
 - b) After placing a licensed facility into operation - All applicable quality assurance program elements for each functional area shall be audited within a period of two years. For well-established activities, the period may be extended one year at a time beyond the two-year interval based on the results of an annual evaluation of the applicable functional area and objective evidence that the functional area activities are being satisfactorily accomplished. However, the internal audit interval shall not exceed a maximum of four years.



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- c) Activities not related to a licensed facility or other support activities - All applicable quality assurance program elements shall be audited at least once each year or at least once during the life of the activity, whichever is shorter. This interval may be extended up to two years based on the results of an annual evaluation and objective evidence that the activities are being satisfactorily accomplished in accordance with the applicable quality assurance program elements.

18.3.1.3 The audit schedule is reviewed periodically and revised, as necessary, to ensure that coverage is current.

18.3.1.4 When necessary to ensure adequate coverage, the scheduled audits may be supplemented by focused, in-depth audits or self-assessments covering specific subjects.

18.3.2 Audit Plan

18.3.2.1 The auditing organization develops and documents an audit plan specific to each audit.

18.3.2.2 This plan identifies the audit scope, requirements, personnel assigned to the audit, the activities to be audited, any organizations to be notified; and the applicable documents, schedules, and written procedures or checklists to be used.

18.3.3 Audit Performance

18.3.3.1 Elements selected for audit shall be evaluated against specified requirements.

18.3.3.2 Objective evidence shall be examined to the depth necessary to determine if the elements are effectively implemented.

18.3.3.3 Conditions requiring prompt corrective action shall be reported immediately to management of the audited organization.

18.3.4 Audit Report

Following the audit, a report is generated and signed by the audit team leader. The report includes the following information, as appropriate:

- a) A description of the audit scope
- b) Identification of the auditors by name and organization
- c) Identification of persons contacted during audit activities
- d) A summary of the audit results, including a statement on the effectiveness of the quality assurance program elements that were audited
- e) A description of each adverse audit finding in sufficient detail to enable an effective corrective action to be taken by the audited organization

18.3.5 Audit Records

Audit records are required to include audit plans, audit reports, written replies, and the record of the completion of any corrective actions resulting from the audit.

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18.4 Internal Audits

The Quality Oversight organization is responsible for internal audits of the implementation of the requirements stated in this QAPD to accomplish the following:

- to ensure compliance with the overall Quality Assurance Program,
- to ensure compliance with the applicable codes, standards, and regulations,
- to ensure the QAPD is effectively implemented,
- to ensure the QAPD is adequate and maintained.

18.5 Supplier Audits

18.5.1 Supplier quality assurance programs are audited on a triennial basis starting with the year that the first audit occurs, and if the procurement scope significantly changes from the originally audited scope.

18.5.2 Exigent Conditions:

18.5.2.1 During periods of exigent conditions affecting GEH facilities or its suppliers, and where performance of audit or survey activities for domestic and international suppliers is not feasible, a 25% extension of the triennial audit period may be exercised. The total allowable extension for exigent conditions is 275 days.

Examples of exigent conditions include, but are not limited to the following:

- a. declaration of a national emergency or state of emergency impacting GEH facilities or supplier infrastructure,
- b. natural disaster, weather emergency or other severe localized or national weather event or resulting damage to or impacting GEH facilities or supplier infrastructure, or
- c. localized outbreak of a severe health concern to the public impacting GEH facilities or supplier infrastructure.

18.5.2.2 Continued use of suppliers that have exceeded the time period for audits or surveys due to exigent conditions is allowed, if the following conditions are met:

- a. Priority should be given to completing audits and surveys of affected suppliers in order of the expiration of the triennial audit period. Such audits or surveys should be completed as soon as practical and shall also include a review of supplier activities performed since the triennial audit expiration date.
- b. GEH shall verify that the supplier is still implementing a quality assurance program that meets Appendix B to 10 CFR Part 50.
GEH shall verify that the suppliers have maintained adequate documented programmatic controls in place for the activity affecting quality.
- c. A documented evaluation shall be performed identifying the conditions inhibiting performance of the audit or survey and providing a basis for maintaining the supplier as an approved supplier during the exigent condition 25% extension period. The evaluation should consider the following, as applicable:

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- 1) Any significant open issues with the NRC, any open Part 21 notifications, and any open findings since the previous triennial audit.
- 2) The relative importance, complexity and quantity of the items/services procured,
- 3) Supplier's quality performance
- 4) Consideration of additional procurement or inspection requirements, such as:
 - Supplier document submittals for review
 - Supplier inspection/testing requirements or sampling plans
 - Receipt inspection or sampling plans
- d. If there is no ongoing receipt inspection or operating experience with which to analyze the supplier for a period of 12 months since the last audit or survey, an annual documented evaluation shall be performed and include the following:
 - 1) Review of supplier-furnished documents and records such as certificates of conformance, nonconformance notices, and corrective actions.
 - 2) Results of previous source verifications, audits, survey and receiving inspection activities.
 - 3) Operating experience of identical or similar products furnished by the same supplier.
 - 4) Results of audits from other sources (e.g., customer, American Society of Mechanical Engineers (ASME), or NRC audits).
- e. If the contract or a contract modification significantly enlarges the scope of, or changes the methods or controls for, activities performed by the same supplier, the supplier will provide documented justification that the change(s) are adequately addressed by its quality assurance program controls.

18.5.2.3 For audits performed during the 25% extension period for exigent conditions, the audit "clock" does not reset backwards to the original date the audit or survey should have been performed. Rather, the date that the audit or survey is actually performed would be the start of the new triennial audit or survey frequency.

18.5.3 In addition to triennial audits, annual evaluations of suppliers are conducted as described in Section 7 of this QAPD.

18.5.4 If more than one purchaser buys from a single supplier, a purchaser may either perform or arrange for an audit of the supplier on behalf of itself and other purchasers to reduce the number of external audits of the supplier.

18.5.5 The scope of this audit should satisfy the needs of all of the purchasers, and the audit report should be distributed to all the purchasers for whom the audit was conducted.

18.5.6 Each of the purchasers relying on the results of an audit performed on behalf of several purchasers remains individually responsible for the adequacy of the audit.



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18.6 Audit Response and Follow-up

18.6.1 Management of the audited organization or activity performs the following activities:

- Investigates adverse audit findings
- Schedules corrective action, including measures to prevent recurrence of significant conditions adverse to quality
- Notifies the auditing organization in writing of action taken or planned

18.6.2 Responses to audit findings are evaluated by the auditing organization.

18.6.3 Follow-up action is taken to verify that any corrective action required is accomplished as scheduled.

18.7 Commitment

In establishing an audit program, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria XVIII, NQA-1-2015 Edition, Requirement 18 and US NRC Regulatory Guide (RG) 1.28, Revision 5, October 2017.



PART III SUPPLEMENTAL DETAILS

1.0 QUALITY MANAGEMENT SYSTEM AND PROCESSES

1.1 General Requirements

1.1.1 The Quality Management System (QMS) as delineated in this Quality Assurance Program Description (QAPD) is implemented, maintained and continually improved through the use of implementing procedures, quality objectives, audit results, analysis of data, corrective and preventive action, and management review.

1.1.2 To establish and implement this QMS, GEH has:

- Identified and documented the processes needed, and their application throughout the organization.
- Determined the sequence and interaction of these processes.
- Determined criteria and methods needed to ensure that the operation and control of the processes are effective and are documented in quality plans and implementing procedures.
- Ensured the continuing availability of resources and information necessary to achieve planned results and continual improvement of these processes.
- Established a system for addressing risks and opportunities.
- Determined external and internal issues to achieve planned results.
- Established systems to monitor, measure, review and analyze these processes.
- Established processes to identify and implement actions necessary to achieve planned results and continual improvement of these processes.
- Provided products and services that meet customer and applicable statutory and regulatory requirements by determining the interested parties relevant to the quality management system and assuring that the interested parties requirements accomplished by monitoring and reviewing information about their relevant requirements.

1.2 Planning

1.2.1 Quality Objectives

1.2.1.1 Quality objectives are established throughout the organization to implement the quality policy, to meet process and product requirements, to include risk and opportunities, including internal and external issues, to promote the use of risk-based thinking and to facilitate continual improvement.

1.2.1.2 During management review meetings, quality objectives are reviewed against set goals and past performance.

1.2.2 Quality Management System Planning

1.2.2.1 Quality system processes are planned to ensure that the system is appropriate for its intended purpose, and that it is effective.

1.2.2.2 Various quality objectives and documents comprising the QMS are periodically reviewed and appropriate changes are made. These changes may be in response to

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changing circumstances, such as process or organizational change, external or internal factors evaluation, risk and opportunities analysis change or to improve the effectiveness of the quality system.

- 1.2.2.3** Before implementing, each quality assurance programmatic change is reviewed to ensure that it does not conflict with the integrity of the QMS.

2.0 SUPPORT MANAGEMENT**2.1 Resources**

- 2.1.1** The GEH business segments have the responsibility of planning and implementing the quality assurance functions performed within their area of responsibility. The quality assurance activities related to design, procurement, production, installation, inspection, and test of the product and services are performed by the business segments and supporting organizations.
- 2.1.2** GEH manages information and knowledge as a resource.
- 2.1.3** Change is managed to assure each change is planned, controlled, communicated, monitored and tracked.
- 2.1.4** The business segments are responsible for identifying quality requirements, quality related activities to be performed, and for providing adequate resources to:
- Plan, develop processes, implement requirements, and deliver products and services to customer satisfaction
 - Maintain and continually improve the QMS
 - Enhance delivered quality and customer satisfaction
 - Perform audit and oversight activities

2.2 Communication

- 2.2.1** To achieve the effectiveness of the QMS, the following internal communication channels are established within GEH:
- Broadcast communications
 - Indoctrination sessions or staff meetings
 - Integrated Management Review (to review, integrate and communicate quality-related matters, problems, corrective actions, status and effectiveness of assigned projects for continuous improvement, and annual reports on the status and adequacy of the quality management system to the top-level management)
- 2.2.2** The subject matter discussed may include:
- Performance and/or improvements upon quality objectives
 - Customer feedback
 - Customer/regulatory requirements
 - Adequacy of quality system, processes, and procedures
 - Safety, health, environmental items
 - Security topics
 - Business goals

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2.2.3 The distribution of results from management reviews, internal audit results, etc. are also used as communication tools regarding the effectiveness of the QMS.

2.3 Management Review**2.3.1 General**

Top management of GEH reviews the GEH QMS to ensure its continuing suitability and effectiveness. These reviews identify opportunities for improvement and needed changes.

2.3.2 Review Input

During management reviews, typical input includes the following:

- Quality objectives
- Results of audits
- Customer feedback
- Process performance and product conformity
- Status of corrective and preventive actions
- Follow-up actions from previous management reviews
- Planned changes that could affect the Quality Management System
- Recommendations for improvement

2.3.3 Review Output

Review output from the management review shall include decisions and actions related to the following:

- Improvement of the effectiveness of the QMS and its processes
- Improvement of product related to customer requirements
- Resource needs to ensure proper implementation of the QMS, and assignment of responsibilities for completing actions

3.0 OPERATIONS**3.1 Operational Planning and Control**

3.1.1 The processes needed for product realization have been developed and are consistent with the requirements of the other processes of the QMS.

3.1.2 All products and services shall meet the applicable quality requirements addressed in Part II of this QAPD and the following:

- Customer procurement requirements specified in contracts, purchase orders, procurement documents, work authorizations, specifications, or equivalent controlled documents
- Industrial, regulatory, environmental, and safety standards and controls as specified by controlled work authorization, specification, customer procurement requirements, or equivalent controlled documents, as applicable to the business

3.1.3 Implementing procedures related to work planning and scheduling require the responsible manager to develop and document the work plan for the overall job, including appropriate

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consideration of purchase order requirements, quality requirements, organizational interfaces, verification, and job closure.

3.1.4 Implementing procedures related to new product introduction describe the detailed process for the development and introduction of new products.

3.1.5 Other considerations during product realization planning include product specific:

- Quality objectives and requirements (customer wants, regulatory, risk and opportunities, technical and quality)
- Processes (design engineering, procurement, supplier evaluation)
- Documentation (drawings, specifications, procedures, plans, instructions)
- Resources (personnel with appropriate skills and qualifications, facilities, equipment)
- Verification, validation, monitoring, inspection and test requirements (evidence of results, certifications and Quality Assurance Records)
- Acceptance criteria

3.1.6 Product realization planning and requirements for customer site work are addressed in applicable project and quality plans.

3.2 Requirements for Products and Services**3.2.1 Determination of Requirements Related to the Products and Services**

Proposals and contracts are reviewed to determine customer requirements in accordance with implementing procedures for commercial risk and approval, work planning and scheduling, design inputs and customer technical requirements, and spare and renewal parts. This includes customer's stated requirements or intended expectations, regulatory requirements, product specification, and any other GEH identified requirements.

3.2.2 Review of Requirements Related to the Product

3.2.2.1 Prior to contract acceptance, various product and service related requirements are reviewed in accordance with the commercial risk and approval process to ensure that:

- Product and service requirements are defined
- Contract requirements differing from those previously stated are resolved
- GEH has the ability to meet the defined requirements
- Where a customer does not provide a documented statement of requirement, the customer requirements are confirmed before acceptance

3.2.2.2 Implementing procedures define processes and requirements for review and acceptance of customer technical requirements and design inputs for design and engineering services, and requirements for review and acceptance of requirements for spare and renewal parts.

3.2.3 Customer Communication

3.2.3.1 Customer Account Leaders/Project Managers are responsible for fulfilling customer requirements for product information, inquiries, and orders including amendments. Responsible Customer Account Leaders/Project Managers monitor customer

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satisfaction with products through customer feedback methods and direct communication with the goal of improving customer satisfaction.

3.2.3.2 Direct customer communications are accomplished utilizing media, such as:

- Product Services Information Letters (SIL)
- Internet website for engineering services
- Request for quote inquiries
- Customer feedback and/or complaints

3.3 Graded Approach to Quality

3.3.1 The safety related classification of products and services is documented and approved by the appropriate management.

3.3.2 The safety related classification of products and services is based upon:

- Significance and complexity
- Hazards and magnitude of the potential impact including the possible consequences of failure.

3.3.3 The process, control and methodology to ensure accurate classification of items is documented in procedures.

4.0 PRODUCTION AND SERVICE PROVISION**4.1 Control of Production and Service Provision**

4.1.1 GEH will plan and implement production and service activities (including field services) under controlled conditions, which include:

- The availability of information that describes the characteristics of the product/service
- The availability of work instructions
- The use of suitable equipment and trained/qualified personnel
- The availability and use of monitoring and measurement equipment
- The implementation of monitoring and measurement activities
- The implementation of product/service release, delivery and post-delivery activities

4.1.2 Manufacturing suppliers are evaluated to ensure their capability to produce under controlled conditions including suitable equipment, processes, personnel skills, procedures, and work instructions, and utilization of calibrated measuring and test equipment for product acceptance.

4.1.3 Servicing of material/equipment is performed by the applicable business in accordance with the customer's contract.

4.1.4 Field services are provided under individual project or quality plans, as applicable to the contract.

4.2 Identification and Traceability

4.2.1 Unique identification and traceability of materials, parts and components, is addressed in Part II, Section 8.0 of this QAPD.

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- 4.2.2 The status of materials, parts and components is addressed in Part II, Section 14.0 of this QAPD.
- 4.2.3 All GEH engineering drawings and specifications are controlled according to implementing procedures to ensure that products are identified during all stages of production, delivery, and installation; and that they are traceable.
- 4.2.4 Product definition documentation is controlled as Quality Assurance Records per implementing procedures.
- 4.2.5 Procedures related to material and equipment traceability requirements are used to assure product identification and traceability.
- 4.2.6 Procedures related to material inspection and release ensure that inspected and tested products are identified appropriately to indicate monitoring and measurement status.
- 4.2.7 Inspection and test status at customer sites is controlled in accordance with applicable project and quality plans.

4.3 Customer Property

- 4.3.1 Procedures pertaining to customer supplied material ensure that customer supplied material is received, inspected, stored, maintained in a controlled environment, and that any customer supplied material that is lost, damaged, or is otherwise unsuitable for use be reported to the customer.
- 4.3.2 Implementing procedures that define control of proprietary information ensure that customer supplied documents are protected and handled in a controlled manner.

5.0 MONITORING, MEASUREMENT, ANALYSIS AND EVALUATION**5.1 General**

- 5.1.1 GEH plans and implements periodic self-assessments and audits, performs measurement and analysis, and determines improvements as needed to:
 - Demonstrate conformity of the product and services
 - Ensure conformity of the QMS
 - Continually improve the effectiveness of the QMS
- 5.1.2 These requirements and methods are identified in the procedures for audits, self-assessments and the Corrective Action Program.
- 5.1.3 Procedures are established for assessing statistical trends and include determination of applicable methods, including statistical techniques, and the extent of their use.

5.2 Monitoring and Measurement**5.2.1 Customer Satisfaction**

- 5.2.1.1 GEH's commitment to customer satisfaction includes serving customer needs with reliable, consistent, and superior products and service, while maintaining the highest standards of integrity.

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5.2.1.2 Customer Feedback and related information is used to gauge company performance against customer requirements.

5.2.1.3 Direct communications are established with customers by the GEH Customer Service representatives, Account Leaders and Project Managers to inquire, monitor, and ensure that customer requirements are fulfilled.

5.2.1.4 General Expectations for customer satisfaction are to:

- Drive customer satisfaction and loyalty.
- Deliver results with a sustained compliance culture.
- Continually improve everything we do, leveraging Lean and Six Sigma methodologies.
- Achieve operational excellence that our employees and customers feel.
- Provide and understand customer needs and make every reasonable effort satisfy them before, during, and after every transaction.
- Make every effort to honor commitments to customers that reflect our expertise and capabilities while providing clear and timely communications.

5.2.2 Monitoring and Measurement of Process

5.2.2.1 Self-assessments, in addition to audits and measurement methods, where applicable, are applied to demonstrate the ability of the processes of the QMS to achieve planned results. This QAPD and implementing procedures for the Corrective Action Program define activities such as:

- Setting quality objectives
- Performing self-assessments
- Initiating actions to correct identified deficiencies
- Conducting management reviews

5.2.2.2 Control of nonconforming material related procedures detail the process of documenting and controlling nonconforming products and services.

5.3 Analysis of Data

5.3.1 Data is collected and analyzed to demonstrate effectiveness of the QMS and to evaluate the following:

- Customer satisfaction (complaints, feedback, scorecards)
- Conformity to product and services requirements (nonconformances, analyses, and trends)
- Corrective Action Program
- Suppliers (performance trend)

5.3.2 Data collected at various sources is analyzed to assess and improve customer satisfaction, product quality, process trends, and supplier performance.

5.3.3 In addition to standard data analysis tools, Six-Sigma continuous process improvement techniques may be incorporated.



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5.3.4 Procedures related to statistical techniques list various techniques for use by GEH personnel.

6.0 SAFETY CULTURE & SAFETY CONSCIOUS WORK ENVIRONMENT

GEH management performs the following actions to establish the appropriate safety conscious work environment within GEH operations:

- 6.1** Ensures common understanding of the key aspects of safety culture within the organization.
- 6.2** Provides the means by which the organization supports individuals and teams in carrying out their tasks safely and successfully, taking into account the interaction between individuals, technology and the organization.
- 6.3** Reinforces a learning and questioning attitude at all levels of the organization.
- 6.4** Provides the means by which the organization continually seeks to develop and improve its safety culture.
- 6.5** Provides the means by which the organization assess the performance of its safety culture.



PART IV REGULATORY COMMITMENTS

1.0 QAPD Part I and Part II Commitments

The company commits to compliance with the following regulations and standards:

- 10CFR Part 50 Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants
- ASME NQA-1-2015 Edition, Quality Assurance Requirements for Nuclear Facility Applications

Position: The company commits to NQA-1-2015 Part I in its entirety and Part II for those activities within GEH's scope as an NSSS supplier. The commitment are further described in the commitment sections of this QAPD and contract specific quality plans.

- 10 CFR Part 21, Reporting of Defects and Noncompliance
- 10 CFR Part 70, Domestic Licensing of Special Nuclear Material; Subpart D (70.22(f)) for licensing of special nuclear material
- 10 CFR Part 71, Packaging and Transportation of Radioactive Material; Subpart H
- 10 CFR Part 72, Licensing Requirements for Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste and Reactor-Related Greater than Class C Waste; Subpart G for storage of radioactive material and waste

2.0 QAPD Part II Regulations and Standards References

The company commits to the following guidance documents to develop the GEH Quality Assurance Program:

- US NRC Regulatory Guide (RG) 1.28, Revision 5, October 2017, "Quality Assurance Program Criteria (Design and Construction)"

Position: The company commits to the audit frequency requirements as defined in NQA-1-2015, Section 201.

- US NRC Regulatory Guide (RG) 1.164, Revision 0, June 2017, "Dedication of Commercial-Grade Items for use in Nuclear Power Plants"
- ISO/IEC 17025, "General Requirements for the Competence of Testing and Calibration Laboratories", 2017 Edition
- ML19056A451 (April 16, 2019), Provisional Recognition of the International Standard Organization (ISO)/International Electromechanical Commission (IEC) standard No. 17025, "General Requirements for the Competence of Testing and Calibration Laboratories", 2017 Edition
- NEI 14-05A, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services"
- NIRMA (Nuclear Information and Records Management Association, Inc.) Technical Guides (TG); NIRMA TG-11, NIRMA TG-15, and NIRMA TG-16; as endorsed by US NRC Regulatory Guide (RG) 1.28, Revision 5

Position: The company commits to NIRMA TG-21 1998 Edition as endorsed by US NRC RIS 2000-18.



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Additional standards may be referenced, or commitments specified in project specific or work specific quality plans and implementing procedures as required.

3.0 QAPD Part I and Part III Standards

The company commits to compliance with the following standards:

- ISO 9001, Quality Management Systems
- IAEA GSR Part 2, Leadership and Management for Safety
- KTA 1401, General Quality Requirements
- JEAC 4111, Quality Assurance Code for Safety in Nuclear Power Plants
- ISO 14001, Environmental Management Systems
- ISO 45001, Occupational Health and Safety Management Systems Requirements with Guidance for Use

Commitments to additional standards may be specified in project specific or work specific quality plans and implementing procedures as required.



APPENDIX A: GEH RESPONSES TO NRC RAI

This appendix includes the GEH responses to the following RAIs:

Responses to RAIs on NEDO-11209 Revision 11:

Three RAIs from MFN 14-057, dated August 29, 2014

A supplemental response to RAI 2, from MFN 14-057 Supplement 1, dated September 23, 2014.

Responses to RAIs on the amendment to NEDO-11209 Revision 12:

One RAI from MFN 16-017, dated March 2, 2016

One RAI from MFN 16-026 dated April 15, 2016

Response to the one RAI on NEDO-11209 Revision 15:

One RAI from M200075, dated May 13, 2020

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RAI 1: (MFN 14-057, dated August 29, 2014)

In January 2011, the U.S. Nuclear Regulatory Commission (NRC) staff approved NEDO-11209, "GE Hitachi Quality Assurance Program Description," Revision 9. In March 2014, General Electric Hitachi (GEH) submitted Revision 11 to the NRC, but did not submit Revision 10. GEH provided Enclosure 2, "Roadmap for NEDO-11209, Revision 11," which covered NEDO-11209, Revision 9 mapping to Revision 10 and 11. In the Table, the NRC staff identified five changes made in NEDO-11209, Revision 10, Section 1.1, Section 1.4.2.2, Section 1.4.3.1, and Section 18.4. The NRC staff requests that GEH verify that these are all the changes made to the NRC approved NEDO-11209, Revision 9, that were incorporated into NEDO-11209, Revision 10. The staff's purpose is to verify that GEH's Revision 10 of the Quality Assurance Program Description (QAPD) remained acceptable in accordance with Title 10 of the *Code of Federal Regulation* (10 CFR) 50.4(b)(7)(ii).

GEH Response:

GEH has provided Attachment 1 to this document which lists all the changes from Revision 9 to Revision 10.

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RAI 2:

In the GEH QAPD, Part II, "QAPD Details," changes were made to Section 2.0, "QUALITY ASSURANCE PROGRAM," Subsection 2.8, "Quality Assurance Program Description Management," Item 1, to read as follows:

"Changes that are made to the QAPD that are a reduction in commitment are submitted to the US NRC for review and approval per 10 CFR 50.4(b)(7)(ii)."

The requirements of 10 CFR 50.4(b)(7)(ii) for changes to a vendor's QA program do not permit vendors to evaluate whether or not changes to an NRC approved QAPD are reductions in commitment. The NRC staff requests that GEH clarify its process of evaluating potential reductions in commitment.

GEH Response:

The basis for the GEH request for this process option originates in our understanding of the NRC's approach in dealing with non-licensee Quality Assurance (QA) programs. It is clear in 10 CFR 50.4(b)(7)(ii) that a change to an approved program has to be submitted, but it isn't clear that NRC review and approval is always required. Two examples, in particular, led to the requested item being added to our revision request. First, in the approval letter for another vendor's Quality Management System (QMS) ([ML12338A515](#)), it is clear that the NRC review utilizes, in part, 10 CFR 50.54(a)(4) to determine the acceptability of changes to a non-licensee QMS program. Second, the Safety Evaluation Report provided by the NRC for Revision 9 of NEDO-11209 ([ML112140602](#)) contained the following paragraph in the Regulatory Evaluation section (bold text added for emphasis):

*The NRC regulatory requirements related to quality assurance (QA) programs for non-licensees are set forth in 10 CFR 50.4(b)(7)(ii). This regulation requires that a change to an NRC accepted QATR from non-licensees (i.e., architect/engineers, nuclear steam supply system (NSSS) suppliers, fuel suppliers, constructors, etc.) must be submitted to the NRC. **When requested**, the NRC will review the proposed QATR for acceptability to ensure the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied.*

The phrase "When requested" implied that further review and approval by the NRC staff was contingent upon a specific request. GEH interpreted these two examples to mean that we should submit all changes but only request NRC review and approval of those that failed a detailed screening criteria as discussed below.

GEH has drafted Section 2.8 based upon 10 CFR 50.54 (3) and will use a screening process to evaluate potential reductions in commitment that are in line with 10 CFR 50.54 (3).

1. The first category of changes is administrative in nature: improvement and clarifications, spelling corrections, punctuation, or editorial items.
2. The second category of changes are based upon NRC acceptance of other standards:
 - o The use of a QA standard approved by the NRC which is more recent than the QA standard in the QAPD at the time of the change;
 - o The use of a QA alternative or exception approved by an NRC safety evaluation (SE), provided that the bases of the NRC approval are applicable to GEH; and
 - o The elimination of QA program information that duplicates language in QA regulatory guides and QA standards to which GEH is committed.
3. The third category is focused on organizational changes:
 - o The use of generic organizational position titles that clearly denote the position function, supplemented as necessary by descriptive text, rather than specific titles;
 - o The use of generic organizational charts to indicate functional relationships, authorities, and responsibilities, or, alternately, the use of descriptive text; and
 - o Organizational revisions that ensure that persons and organizations performing QA functions continue to have the requisite authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations.
4. The fourth category is intended to cover changes in the QAPD in Part III that are made to address international standards changes. NEDO-11029 Revision 11 Section 2.8(g) currently states:
"Any change to Part III, "Supplemental Details" or Part IV, "References" that do not entail NRC related standards (i.e. ISO 9001, KTA-1401, GS-R-3)."

GEH proposes to make the following changes in the "-A" version of NEDO-11209 Revision 11:

- Move the international standards from Part IV, "Regulatory Commitments" to Part III;



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- Create a new section in Part III “Supplemental Details”: Section 7.0 “References”; and
- NEDO-11209 Part II Section 2.8 (g) would be changed to read:
“Any change to Part III, “Supplemental Details” that do not entail NRC related standards (i.e. ISO 9001, KTA-1401, GS-R-3).”



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RAI 3:

The NRC staff determined that GEH did not make a commitment to the American Society of Mechanical Engineers NQA-1-2008/2009a, Subpart 2.7, "Quality Assurance Requirements of Computer Software for Nuclear Facility Applications." The staff requests clarification on the applicability of Subpart 2.7 to GEH's quality activities.

GEH Response:

GEH will include a commitment to NQA-1-2008/2009a, Subpart 2.7, "Quality Assurance Requirements of Computer Software for Nuclear Facility Applications" in Sections 3.10 and 11.6 of the "-A" version of NEDO-11209 based on the NRC SE.



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Attachment 1: GEH Quality Assurance Program Description NEDO-11209 Revision 9 Mapping to Revision 10

| Revision 9 Section | Revision 9 Section Description | Revision 10 Summary of Change |
|--------------------|--|--|
| | Disclaimer | No change |
| | Revision History | Updated |
| | Table of Contents | Updated |
| | Acronyms & Abbreviations | Added EHS, GSC, SCAQ in Revision 10 In Revision 10, Removed NQA from Acronyms & Abbreviations. |
| | Introduction | No change |
| | Scope | No change |
| SECTION 1 | Organization | No change |
| 1.1 | General | Clarified QAPD adherents Removed organizational elements table |
| 1.2 | Organizational Description | No change |
| 1.2.1 | Organizational Structure | Updated to reflect 2012 organizational structure |
| 1.2.1.1 | P&Ls | Updated to reflect 2012 organizational structure |
| 1.2.1.2 | Support Organizations | Updated to reflect 2012 organizational structure |
| 1.2.1.3 | Quality | Updated to reflect 2012 organizational structure |
| 1.2.2 | Management Positions | No change |
| 1.2.2.1 | President and Chief Executive Officer | Wording change in first paragraph, removed duplicate text on establishment of GEH QA policy. Added that the President additionally reports to GE Power and Water. |
| 1.2.2.2 | Business Leaders for P&L's and Support Organizations | No change |
| 1.2.2.3 | Quality Leader | Removed NQA & Support Services title, combined them into Quality Programs Combined P&L and Support Quality Leaders into "Organization Specific Quality Leaders" Added Continuous Improvement |
| 1.2.3 | Functional Responsibilities | No change |
| 1.2.4 | Interface responsibilities | No change |
| 1.3 | All Employees and contractors | No change |
| 1.4 | Authority to Stop Work | Removed NQA title and added Quality Assurance Organization |
| 1.5 | Delegation Outside the GEH Organization | No change |
| 1.6 | Commitment | No change |
| Figure 1 | Organizational Structure | Updated figure for 2012 organization |
| Figure 2 | Functional Responsibilities | Replaced table with new table reflecting 2012 organization |
| SECTION 2 | QUALITY ASSURANCE PROGRAM | No change |
| SECTION 3 | DESIGN CONTROL | No change |
| SECTION 4 | PROCUREMENT DOCUMENT CONTROL | No change |
| SECTION 5 | PROCEDURES, INSTRUCTIONS, AND DRAWINGS | No change |
| SECTION 6 | DOCUMENT CONTROL | No change |
| 6.1 | General | No change |



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| Revision 9 Section | Revision 9 Section Description | Revision 10 Summary of Change |
|---------------------------|---|---|
| 6.2 | Review and Approval of Documents | No change |
| 6.3 | Changes to Documents | No change |
| 6.4 | Temporary Documents | Clarified to current process for all temporary changes |
| 6.5 | Commitment | No change |
| SECTION 7 | CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES | |
| 7.1 | General | No change |
| 7.2 | Supplier Evaluation and Selection | No change |
| 7.3 | Proposal/Bid Evaluation | No change |
| 7.4 | Control of Supplier Generated Documents | No change |
| 7.5 | Control of Supplier Nonconformances | Removed conditionality of nonconformance reporting from #4 |
| 7.6 | Acceptance of Items or Service | No change |
| 7.7 | Supplier Performance Evaluation | No change |
| 7.8 | Commercial Grade Items and Services - Dedication | No change |
| 7.9 | Records | No change |
| 7.10 | Commitment | Eliminated 1st bullet exception to Requirement 7 Editorial changes |
| SECTION 8 | IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS | No change |
| SECTION 9 | CONTROL OF SPECIAL PROCESSES | No change |
| SECTION 10 | INSPECTION | |
| 10.1 | General | No change |
| 10.2 | Inspection Personnel | Clarified to include how activities are defined |
| 10.3 | Planning | No change |
| 10.4 | Final Inspection | No change |
| 10.5 | Records | Editorial/layout changes |
| 10.6 | Commitment | No change |
| SECTION 11 | TEST CONTROL | Some editorial changes throughout section |
| SECTION 12 | CONTROL OF MEASURING AND TEST EQUIPMENT | No change |
| SECTION 13 | HANDLING, STORAGE, AND SHIPPING | No change |
| SECTION 14 | INSPECTION, TEST, AND OPERATING STATUS | No change |
| SECTION 15 | NONCONFORMING MATERIALS, PARTS, OR COMPONENTS | |
| 15.1 | General | No change |
| 15.2 | Identification and Control | No change |
| 15.3 | Disposition | Eliminated 2nd sentence in Rework and Repair definition to align with current procedure requirements Editorial changes |
| 15.4 | Re-examination | No change |
| 15.5 | Commitment | No change |
| SECTION 16 | CORRECTIVE ACTION | No change |



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| Revision 9 Section | Revision 9 Section Description | Revision 10 Summary of Change |
|---------------------------|---------------------------------------|--|
| SECTION 17 | QUALITY ASSURANCE RECORDS | Editorial changes |
| SECTION 18 | AUDITS | |
| 18.1 | General | No change |
| 18.2 | Personnel | No change |
| 18.3 | Audit Documentation | Editorial changes |
| 18.4 | Internal Audits | Updated to reflect 2012 organization change responsibility for Internal Audits |
| 18.5 | Supplier Audits | No change |
| 18.6 | Audit Response and Follow-up | No change |
| 18.7 | Commitment | No change |
| APPENDIX A | REGULATORY COMMITMENTS | No change |

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RAI 2: (MFN 14-057 Supplement 1, dated September 23, 2014)

In the GEH QAPD, Part II, "QAPD Details," changes were made to Section 2.0, "QUALITY ASSURANCE PROGRAM," Subsection 2.8, "Quality Assurance Program Description Management," Item 1, to read as follows:

"Changes that are made to the QAPD that are a reduction in commitment are submitted to the US NRC for review and approval per 10 CFR 50.4(b)(7)(ii)."

The requirements of 10 CFR 50.4(b)(7)(ii) for changes to a vendor's QA program do not permit vendors to evaluate whether or not changes to an NRC approved QAPD are reductions in commitment. The NRC staff requests that GEH clarify its process of evaluating potential reductions in commitment.

GEH Response:

GEH will replace the three numbered sections in Subsection 2.8 "Quality Assurance Program Description Management" with the following two numbered sections in the "-A" version of NEDO-11209 based on the NRC SE:

1. Proposed changes to this QAPD are submitted to the NRC for review and approval per 10 CFR 50.4(b)(7)(ii). The proposed changes will be termed "amendments" to the QAPD and will be presented as markups of the then approved version along with a basis discussion for each change.
2. Upon receipt of the NRC approval of each amendment, the QAPD shall be revised and issued as "NEDO-11209-A" and the revision number incremented. Each NRC approved amendment, with the associated changes, is illustrated in the Revision History located in the front of this document.

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RAI 1.0: (MFN 16-017, dated March 2, 2016)

General Electric Hitachi Nuclear Energy QAPD, draft changes to Revision 12, Part III, "Supplemental Details," Section 4.4, "Graded Approach to Quality," provides a brief description and the safety classification basis.

Provide additional details to clarify which systems, structures, and components (SSCs) would be subject to the graded approach to quality. Explain what specific criteria will be used to identify which SSCs can use graded quality assurance, and explain how that meets the requirements of Title 10 of the Code of Federal Regulations Part 50, Appendix B.

GEH Response:

GEH applies the graded approach to quality for all items that do not meet the definition of a basic component as defined by 10 CFR Part 21.

A graded approach to quality only applies to non-basic components. For example, it applies to SSCs with a Safety-Related Classification of "S" (Special) in Tier 2 Table 3.2-1 of the ESBWR Design Control Document, Revision 10, dated April 2014 (i.e., the "ESBWR DCD"), as certified by the US NRC effective 11/14/2014. The ESBWR DCD elevates many SSCs that would have been classified as "Non-Safety Related" under 10 CFR 50, Appendix B in order to apply more rigorous quality requirements (see Note 5 of Tier 2 Table 3.2-1 of the ESBWR DCD).

In addition, GEH may apply the classification of Special to products and services provided to international nuclear power plants not covered by 10 CFR 50 Appendix B or 10 CFR Part 21 to ensure that applicable international regulations, codes, and standards are met.

GEH's use of a graded approach to quality meets the requirements of Title 10 of the Code of Federal Regulations Part 50, Appendix B in that GEH applies all applicable 10 CFR 50 Appendix B requirements, as described and endorsed by ASME NQA-1, to all basic components as defined by 10 CFR Part 21.

Effect on QAPD Topical Report:

This RAI response has no effect on the QAPD Topical Report.

**GEH Quality Assurance Program Description**

RAI: (MFN 16-026, dated April 15, 2016)

General Electric Hitachi Nuclear Energy QAPD, draft changes to Revision 12, Part II, "QAPD Details," Section 7.10, "Commitment," provides a brief description of the requirements to be followed when procuring commercial-grade calibration services from a calibration laboratory. Section 4 of NEI 14-05, "Guidelines for the Use of Accreditation in Lieu of Commercial-Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1, states, in part, "Purchasers that rely on the accreditation by ILAC signatories in lieu of commercial-grade surveys are required by 10 CFR Part 50, Appendix B to document this alternative method in their QA Program.... A Template for describing the use of the ILAC process in lieu of a commercial-grade survey in a Purchaser's QA Program is provided in Appendix A. Although a Purchaser is not required to use the Template in Appendix A, all of the actions and steps described in Appendix A need to be included in the Purchaser's QA Program." The staff's evaluation and endorsement of NEI 14-05, is documented in the "Final Safety Evaluation for Technical Report NEI 14-05, 'Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services,' Revision 1," (ADAMS No. ML14322A535), dated February 9, 2015. Additionally, the staff recently issued Regulatory Issue Summary (RIS) 2016-01, "Nuclear Energy Institute Guidance for The Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," (ADAMS No. ML15323A346), dated March 16, 2016. The RIS also reiterated the requirement to include all of the actions and steps in the QA Program.

The proposed change to NEDO-11209-A, Revision 12, does not address the requirements of Appendix A of NEI 14-05 as approved by the staff. Provide clarification on how General Electric Hitachi Nuclear Energy incorporates these requirements of Appendix A in its QAPD.

GEH Response:

GEH will revise its QAPD, NEDO-11209-A, to add all requirements in Appendix A of NEI 14-05A as applicable to procurement of commercial-grade calibration and testing services from a laboratory. These changes can specifically be seen in the attached markup (Enclosure 2) of Section 7.10 of the QAPD and will be incorporated into the final, approved Revision 13 of the QAPD.

Effect on QAPD Topical Report:

The QAPD is modified as described in the GEH response. Enclosure 2 provides a revised Section 7.10 that will be incorporated into the final, approved Revision 13 of the QAPD. Because of the extensive changes, a revision bar version of Section 7.10 is provided in lieu of a redline-strikethrough version. Other administrative changes to the QAPD from the draft version submitted via GEH letter MFN 15-091, dated October 14, 2015, are associated with organizational changes within General Electric and GEH. Namely, "GE Power and Water" will be changed to "GE Power" throughout, and Jay Wileman has replaced Caroline Reda as President and CEO of GE Hitachi Nuclear Energy. Finally, the copyright year on the cover page will be changed from 2015 to 2016. These administrative changes are not shown in this response, but will be incorporated in the final, approved Revision 13 of the QAPD.

QAPD Modifications from MFN 16-026 Enclosure 2**7.8 Commercial Grade Items and Services - Dedication**

1. Utilization of commercial grade items or services is permitted if controls are in place to provide reasonable assurance that the item or service will perform its intended safety function.
2. Such controls include, but are not limited to the following:
 - (a) A determination that the item or service performs a safety function
 - (b) Confirmation that the item or service meets the applicable commercial grade item definitions
 - (c) Identification and documentation of the critical characteristics, including acceptance criteria
 - (d) Selection, performance (inspection/test/survey/surveillance), acceptance, and documentation of the dedication methods for determining compliance with the critical characteristic acceptance criteria

**GEH Quality Assurance Program Description**

3. The commercial grade item or service dedication process will be controlled via documented procedures and retention of objective evidence.

7.9 Records

Records are maintained to indicate the performance of the following functions:

- (e) Supplier evaluation and selection
- (f) Acceptance of the items or services procured
- (g) Supplier nonconformances to procurement document requirements, including a description of their evaluation and disposition

7.10 Commitment

1. In establishing a program for the control of items and services, GEH commits to compliance with 10 CFR Part 50 Appendix B, Criteria VII and NQA-1-2008 Edition with the NQA-1a-2009 Addenda, Requirement 7 with the following exceptions:
 - GEH considers 10 CFR Part 50 licensees, Authorized Nuclear Inspection Agencies, National Institute of Standards and Technology, or other State and Federal agencies, which may provide items or services to GEH, as not requiring evaluation or audit.
 - When purchasing commercial grade calibration or testing services from a laboratory holding accreditation by an accrediting body recognized by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement, commercial grade surveys and source verifications need not be performed provided each of the following conditions are met:
 - A documented review of the supplier's accreditation will be performed and will include a verification of each of the following:
 - The calibration or test laboratory is accredited to ISO/IEC 17025:2005 "General Requirements for the Competence of Testing and Calibration Laboratories" by an accreditation body that is a signatory to the ILAC Mutual Recognition Arrangement per NEI 14-05A as endorsed by the US NRC.
 - For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the necessary measurement parameters, ranges, and uncertainties.
 - For procurement of testing services, the published scope of accreditation for the test laboratory covers the necessary testing services including test methodology and tolerances/uncertainty.
 - The purchase documents require the following:
 - The service must be provided in accordance with the supplier's accredited ISO/IEC-17025:2005 program and scope of accreditation.
 - The reporting of as-found calibration data in the certificate of calibration when calibrated items are found to be out-of-tolerance.
 - The certificate of calibration includes identification of the laboratory equipment and standards used to perform the calibration.
 - The supplier is to notify GEH of any condition that adversely impacts the laboratory's ability to maintain the scope of accreditation.
 - Impose any additional technical and administrative requirements, as necessary, to comply with the GEH QA program and technical provisions, which may include but are not necessarily limited to, tolerances, accuracies, ranges, and industry standards.
 - At receipt inspection, GEH shall validate the following:
 - The contracted calibration or testing service has been performed in accordance with the supplier's ISO/IEC-17025:2005 program, and has been performed within the laboratory's scope of accreditation, and
 - The purchase order's requirements are met.
2. The GEH program for dedication of commercial-grade items commits to be consistent with NQA-1a-2009, Subpart 2.14.

**GEH Quality Assurance Program Description**

RAI: (M200075, dated May 13, 2020)

By letter dated April 29, 2020 (Agencywide Documents Access and Management System Package Accession No. ML20120A553), GE Hitachi Nuclear Energy (GEH) submitted to the U.S. Nuclear Regulatory Commission (NRC) proposed Topical Report, NEDO-11209A, "Quality Assurance Program Description (QAPD)," Revision 15. Below is the NRC staff request for additional information:

- 1) In Section 18.5, "Supplier Audits," of the GEH Quality Assurance Program Description (QAPD), GEH proposes an overall 25% extension of the triennial audit period for audits or surveys of domestic and international suppliers to be exercised during periods of exigent conditions affecting GEH facilities or its suppliers, and where performance of such activities is not feasible. GEH also notes that the 25% extension of the triennial audit period is inclusive of the 90-day grace period.

Please describe how GEH ensures that this wording is clear in its use and applicability in that the 25% extension is only for exigent conditions and does not create confusion regarding the existing 36 months audit frequency and associated 90-day grace period afforded for emergent administrative issues as discussed in GEH QAPD, Section 2.7, "Grace Period."

GEH Response:

GEH will update the Proposed Revision 15 to NEDO-11209A Revision 14, "GE Hitachi Nuclear Energy Quality Assurance Program Description", Section 18.5 first paragraph of sub-section 2.1 which states, "An overall 25% extension of the triennial audit period for audits or surveys of domestic and international suppliers may be exercised during periods of exigent conditions affecting GEH facilities or its suppliers, and where performance of such activities is not feasible. Note: The 25% extension of the triennial audit period is inclusive of the 90-day grace period."

QAPD Modifications from M200075 Enclosure 1

The updated text will-state:

"During periods of exigent conditions affecting GEH facilities or its suppliers, and where performance of audit or survey activities for domestic and international suppliers is not feasible, a 25% extension of the triennial audit period may be exercised. The total allowable extension for exigent conditions is 275 days."

Additionally, QAPD Section 18.5 Sub-part 2.2 will state "Continued use of suppliers that have exceeded the time period for audits or surveys due to exigent conditions is allowed, if the following conditions are met:" and Sub Part 2.2 c will state "A documented evaluation shall be performed identifying the conditions inhibiting performance of the audit or survey and providing a basis for maintaining the supplier as an approved supplier during the exigent condition 25% extension period. The evaluation should consider the following, as applicable:"



APPENDIX B: HISTORICAL NRC SAFETY EVALUATIONS (SE)

| Office of Nuclear Reactor Regulation | | | |
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| Minimal Revisions Review Topical Report Final Safety Evaluation for GE Hitachi Nuclear Energy Topical Report NEDO-11209A, "Quality Assurance Program Description (QAPD)" | | | |
| Topical Report Information | | Review Information | |
| Report Number: Topical Report NEDO-11209A Title: Proposed Revision 15 to GE Hitachi Nuclear Energy (GEH) Topical Report NEDO-11209A, "Quality Assurance Program Description (QAPD)" EPID: L-2020-TOP-0023 Docket No.: 99902024 | | Division/ Branch: DRO/IQVB Project Manager: Ngola Otto Reviewers: Carla Roque-Cruz | |
| Determination of Minimal Revisions | | | |
| Is this the review of very limited scope? | Yes | <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Does the TR change maintain the original SE conclusions? | Yes | <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| Do the staff methods for establishing the original conclusions remain unaffected? | Yes | <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| If any of the above questions are answered no, a simplified safety evaluation cannot be used. | | | |
| 1. Introduction | | | |
| <p>By letter dated April 29, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20120A553), GE Hitachi Nuclear Energy (GEH), requested approval of a proposed change to its quality assurance (QA) program description (QAPD). In response to the United States Nuclear Regulatory Commission (NRC) staff's request for additional information (ADAMS Accession No. ML20125A033) to clarify the proposed changes, GEH provided a supplemental submittal (ADAMS Accession No. ML20134J088) to include additional information to its QAPD. The proposed change was considered a change to an NRC-accepted QAPD from nonlicensees (i.e., architect/engineers, nuclear steam system suppliers (NSSS)), in accordance with Title 10 of <i>the Code of Federal Regulations</i> (10 CFR) Part 50, "Domestic Licensing of Production and Utilization Facilities," 50.4(b)(7)(ii). GEH is also a 10 CFR Part 71, "Packaging and Transportation of Radioactive Material," licensee holder and utilizes the same QAPD to meet the requirements of 10 CFR Part 71. The proposed change extends the supplier audit frequency from once every three years (i.e., triennial) for supplier audits and surveys affected by exigent conditions. The increased period between supplier audits and surveys will be supplemented by analysis or evaluations of supplier performance as prescribed in this safety evaluation. The change is applicable to supplier audits performed to meet the requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50 and Subpart H, "Quality Assurance," of 10 CFR Part 71 for supplier audit frequency for exigent conditions, as described in GEH's QAPD.</p> <p>Currently, GEH's QAPD Chapter 18, "Audits," requires supplier QA programs to be audited on a triennial basis starting with the year that the first audit occurs, and if the procurement scope significantly changes from the originally audited scope. In addition to triennial audits, annual evaluations of suppliers are conducted as described in Section 7 of the QAPD.</p> <p>GEH proposed change to its QAPD is a new section to Chapter 18, Section 18.5.2, to incorporate Exigent Condition requirements. This section includes an overall 25 percent extension of the triennial audit period for audits or surveys of domestic and international suppliers that may be exercised during periods of exigent conditions affecting GEH facilities or</p> | | | |

| Office of Nuclear Reactor Regulation | |
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| Minimal Revisions Review Topical Report Final Safety Evaluation for GE Hitachi Nuclear Energy Topical Report NEDO-11209A, "Quality Assurance Program Description (QAPD)" | |
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| <p>its suppliers, and where performance of such activities is not feasible. Subsection 18.5.2, "Exigent Conditions" to this QAPD states that:</p> <p style="padding-left: 40px;">During periods of exigent conditions affecting GEH facilities or its suppliers, and where performance of audit or survey activities for domestic and international suppliers is not feasible, a 25 percent extension of the triennial audit period may be exercised. The total allowable extension for exigent conditions is 275 days.</p> <p>Exigent conditions, such as the state of emergency caused by COVID-19, impacts GEH's ability to complete external supplier audits and surveys within the frequency specified in their NRC-approved QA program. Exigent conditions have restricted both domestic and international travel and restricted access to supplier facilities. The proposed change to GEH's QAPD would provide an extension to the external supplier audit and survey frequency that need to be completed during exigent conditions.</p> <p>The NRC staff has reviewed the proposed change to GEH's QAPD that would be implemented in the event of exigent conditions for QA programs submitted under 10 CFR 50.4(b)(7)(ii).</p> <p>Details of the NRC staff's evaluation are summarized below.</p> <p>2. Regulatory Basis</p> <p>The regulations at 10 CFR 50.4(b)(7)(ii), set forth the NRC's regulatory requirements regarding changes to an NRC-accepted QA TR from non-licensees (i.e., architect/engineers, NSSS, fuel suppliers, constructors, etc.) that must be submitted to the NRC's Document Control Desk. Similarly, 10 CFR 71.106 sets forth the NRC's regulatory requirements regarding changes to NRC-approved QA programs that will reduce commitments in the program description as approved by the NRC.</p> <p>The regulatory requirements for QA program audits of suppliers is set forth in Criterion VII, "Control of Purchased Material, Equipment, and Services" and Criterion XVIII, "Audits," of Appendix B to 10 CFR Part 50, and in 10 CFR Part 71.115, "Control of Purchase Material, Equipment, and Services and 10 CFR 71.137, "Audits". Licensees contractually impose these requirements upon their suppliers. Criterion VII of Appendix B to 10 CFR Part 50 and 10 CFR 71.115 require establishing measures for assuring that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents. These measures shall include provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of</p> | |

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| <p>products upon delivery. Documentary evidence that material and equipment conform to the procurement requirements shall be available at the nuclear power plant or fuel reprocessing plant site prior to installation or use of such material and equipment. Criterion XVIII of Appendix B to 10 CFR Part 50 and 10 CFR 71.137 require a comprehensive system of planned and periodic audits shall be carried out to verify compliance with all aspects of the QA program and to determine the effectiveness of the program.</p> <p>Regulatory Guide (RG) 1.28, "Quality Assurance Program Criteria (Design and Construction)," Revision 4 (ADAMS Accession No. ML100160003) and RG 7.10, "Establishing Quality Assurance Programs for Packaging Used in Transport of Radioactive Material," Revision 3 (ADAMS Accession No. ML14064A505), identify the ASME's Standard, NQA-1, "Quality Assurance Requirements for Nuclear Facility Applications," as an adequate basis for complying with the requirements of Appendix B to 10 CFR Part 50 and 10 CFR Part 71 Subpart H. RG 1.28 identifies some exceptions which are discussed in the Regulatory Position section of RG 1.28, Revision 4. Both RGs state that the audits and surveys are to be conducted on a triennial basis. RG 1.28, Revision 4, Section C.2.b.5 allows a general grace period to be taken for a supplier audit that must be performed on a triennial basis. Further, the grace period does not allow the supplier audit "clock" to be reset forward. However, the "clock" can be reset backwards by the supplier audit activity being performed early.</p> <p>3. Technical Evaluation</p> <p>In evaluating the adequacy of the proposed change, the NRC staff considered the guidance of NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition," Chapter 17.5, "Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants;" RG 1.28, Revision 4; and ASME NQA-1. The guidance in RG 1.28, Regulatory Position 2.b, "External Audits," states in part, that audits of supplier's QA program should be performed on a triennial basis.</p> <p>The extension of the audit frequency during exigent conditions as proposed by GEH will provide for greater flexibility in its consideration of other similar events, such as the ongoing COVID-19 pandemic. The current national emergency limiting domestic and international travel, is resulting in GEH not meeting its contractual commitment imposed by licensees associated with the external audit frequency. As the duration of the current national emergency is unknown, the NRC agrees an overall extension of 25 percent to the triennial audit frequency for impacted supplier audits and surveys may be implemented for exigent conditions.</p> <p>During the exigent conditions, GEH may continue to use suppliers that have exceeded the maximum allowed audit or survey time based on the conditions set forth in the new subsection,</p> | |

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| <p>"Exigent Conditions," within the GEH QAPD, Revision 15. The NRC staff found that the descriptions provided in Subsection 18.5.2 are consistent with the following NRC staff's considerations for allowing extensions to the periodicity of audits and surveys for suppliers during exigent conditions:</p> <ol style="list-style-type: none"> a. GEH should prioritize completing audits or surveys of affected suppliers based on safety significance and any issues with the supplier. However, the audit or survey shall be completed within the 25 percent grace period. b. There is verification that the supplier is still implementing a quality assurance program that meets Appendix B to 10 CFR Part 50. <ol style="list-style-type: none"> i. For suppliers with delinquent surveys, the entity shall ensure that the suppliers have maintained adequate documented programmatic controls in place for the activity affecting quality. c. The alternative method of the 25 percent extension discussed above is applicable to domestic and international suppliers. d. Receipt inspection and industry operating experience are reviewed on an ongoing basis as the information becomes available and documented. The results of the review are promptly considered for the effects on a supplier's continued qualification and adjustments made as necessary, including corrective actions. e. If there is no ongoing receipt inspection or operating experience with which to analyze the supplier for a period of 12 months since the last audit or survey, an annual documented evaluation shall be performed and include, as appropriate, the following: <ol style="list-style-type: none"> i. Review of supplier-furnished documents and records such as certificates of conformance, nonconformance notices, and corrective actions. ii. Results of previous source verifications, audits, survey and receiving inspection activities. iii. Operating experience of identical or similar products furnished by the same supplier. iv. Results of audits from other sources (e.g., customer, American Society of Mechanical Engineers (ASME), or NRC inspection). | |

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| Minimal Revisions Review Topical Report Final Safety Evaluation for GE Hitachi Nuclear Energy Topical Report NEDO-11209A, "Quality Assurance Program Description (QAPD)" | |
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| <p>f. If the contract or a contract modification significantly enlarges the scope or changes the methods or controls for activities performed by the same supplier, the supplier will provide documented justification the change(s) are adequately addressed by its quality assurance program controls.</p> <p>The overall 25 percent extension for audits or surveys would only be applicable to exigent conditions. A determination of exigent conditions would be based on GEH's prudent judgement.</p> <p>The above frequency extension for supplier audits or surveys during exigent conditions is a different alternative to the 90-day grace period allowed under RG 1.28, Revision 4, Section C.2.b.5. The general 90-day grace period alternative will remain unchanged for conditions of a minor nature. Examples of conditions of a minor nature would include, but not limited to: 1) staffing limitations preventing a timely audit to be completed and 2) scheduling conflicts by either the vendor, supplier or sub-tier supplier.</p> <p>As previously stated, the expectation for the use of the 25 percent frequency extension would be limited to implementation for exigent conditions. The expectation would be that GEH attempts to maintain the current triennial audit or survey period. Unlike the existing alternative on the use of a grace period, GEH would not have to reset the "clock" backwards when the audit or survey is finally performed to the original date the audit or survey should have been performed. The date that the audit or survey is finally performed would be the start of the new triennial audit or survey frequency. The NRC staff considered that should events of a severe nature occur closely together, the requirement for not allowing the "clock" to be reset forward would result in an additional potential scheduling constraint on completing audits or surveys in a timely manner.</p> <p>The NRC considered the maturity of the GEH QA program and its supply chain oversight in determining this allowance of a 25 percent extension for audits and surveys to be completed from the date of the expiration of the triennial audit or survey frequency. The NRC also considered the potential risk significance of extending the audit and survey frequency by 25 percent. Based on the reliability of GEH's QA program, the expected short duration that GEH will be under an exigent condition, and GEH's continuous monitoring of ongoing and previous supplier performance, the NRC staff determined that there is minimal risk associated with implementing the extended audit and survey frequencies during exigent conditions. Therefore, the NRC concluded that the conditions stated above ensure that reasonable assurance of the quality of items and services will continue to be maintained during this extension period.</p> | |

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| 4. Conclusion <p>The NRC staff has reviewed GEH's QAPD, Revision 15 submittal. As stated above, the NRC staff concluded that there is reasonable assurance that GEH's QA program will continue to meet the requirements of Appendix B to 10 CFR Part 50, and 10 CFR Part 71 Subpart H while implementing the 25 percent extension of audit and survey frequencies during exigent conditions. Therefore, the NRC staff found GEH's proposed changes to its QAPD, Revision 15 to be an acceptable method for extending audit frequencies during exigent conditions.</p> <p>Principal Contributor: Carla P. Roque-Cruz</p> <p>Date: May 21, 2020</p> | | | |
| ADAMS Accession Nos: Package: ML20141K704; Transmittal Email: ML20140A332 SE: ML20140A322 | | | |
| Approval | Printed Name | Signature | Date |
| Technical Branch Chief | Kerri Kavanagh | /RA/ | 5/20/2020 |
| Projects Branch Chief | Dennis Morey | /RA/ | 5/20/2020 |

January 10, 2018

Mr. Jerald G. Head
Senior Vice President, Regulatory Affairs
General Electric-Hitachi
Nuclear Energy Americas, LLC
P.O. Box 780, M/C A-18
Wilmington, NC 28401-0780

SUBJECT: FINAL SAFETY EVALUATION FOR GE HITACHI NUCLEAR ENERGY
AMENDMENT TO NEDO-11209 REVISION 13, "GE HITACHI NUCLEAR
ENERGY QUALITY ASSURANCE PROGRAM DESCRIPTION"
(EPID L-2017-TOP-0058)

Dear Mr. Head:

By letter dated October 6, 2017 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17279A629), GE Hitachi Nuclear Energy Americas LLC (GEH) submitted the proposed amendment to Topical Report (TR) NEDO-11209, Revision 13, "GE Hitachi Nuclear Energy Quality Assurance Program Description," to the U.S. Nuclear Regulatory Commission (NRC) staff for review.

By letter dated December 8, 2017, an NRC draft safety evaluation (SE) regarding our approval of TR NEDO-11209 Revision 13, "GE Hitachi Nuclear Energy Quality Assurance Program Description," was provided for your review and comment (ADAMS Accession No. ML17334A074). By letter dated December 15, 2017, you stated that GEH did not identify any factual errors or clarity concerns in the draft SE (ADAMS Accession No. ML17349A537).

The NRC staff has found that TR NEDO-11209, Revision 13, is acceptable for referencing in licensing applications for nuclear power plants to the extent specified and under the limitations delineated in the TR and in the enclosed final SE. The final SE defines the basis for our acceptance of the TR.

Our acceptance applies only to material provided in the subject TR. We do not intend to repeat our review of the acceptable material described in the TR. When the TR appears as a reference in licensing applications, our review will ensure that the material presented applies to the specific plant involved. License amendment requests that deviate from this TR will be subject to a plant-specific review in accordance with applicable review standards.

J. Head

- 2 -

In accordance with the guidance provided on the NRC website, we request that GNF publish an approved version of TR NEDO-11209 Revision 13, within three months of receipt of this letter. The approved version shall incorporate this letter and the enclosed final SE after the title page. The approved version shall include a "-A" (designating approved) following the TR identification symbol.

If future changes to the NRC's regulatory requirements affect the acceptability of this TR, GNF will be expected to revise the TR appropriately or justify its continued applicability for subsequent referencing. Licensees referencing this TR would be expected to justify its continued applicability or evaluate their plant using the revised TR.

Sincerely,

/RA/

Dennis C. Morey, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Docket No. 99902024

Enclosure:
Final SE (Non-Proprietary)

J. Head

- 3 -

SUBJECT: FINAL SAFETY EVALUATION FOR GE HITACHI NUCLEAR ENERGY
AMENDMENT TO NEDO-11209 REVISION 13, "GE HITACHI NUCLEAR
ENERGY QUALITY ASSURANCE PROGRAM DESCRIPTION"
(EPID L-2017-TOP-0058) DATED: JANUARY 10, 2018

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GE-Hitachi Nuclear Energy Americas

Docket No. 99902024

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FINAL SAFETY EVALUATION OF GENERAL ELECTRIC HITACHI NUCLEAR ENERGY,

QUALITY ASSURANCE TOPICAL REPORT NEDO-11209-A, REVISION 13,

“GE HITACHI NUCLEAR ENERGY QUALITY ASSURANCE PROGRAM DESCRIPTION”

(EPID L-2017-TOP-0058)

DOCKET NO. 99902024

1.0 INTRODUCTION

By letter dated October 6, 2017 (Ref. 1), General Electric Hitachi Nuclear Energy (GEH) submitted an amendment to Quality Assurance Topical Report (QATR) NEDO 11209-A, Revision 13, “GE Hitachi Nuclear Energy Quality Assurance Program Description,” to the U.S. Nuclear Regulatory Commission (NRC) for review and approval in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.4(b)(7)(ii). GEH proposed that this updated QATR would replace the current QATR for GEH, which was approved by NRC as documented in a safety evaluation (SE) dated June 6, 2016 (Ref. 2).

2.0 REGULATORY BASIS

The Commission’s regulatory requirements related to Quality Assurance (QA) programs for non-licensees are set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) 50.4(b)(7)(ii). This regulation requires that a change to a NRC-accepted QA program description from non-licensees (i.e., architect/engineers, nuclear steam system suppliers, fuel suppliers, constructors, etc.) must be submitted to the NRC. The NRC will review the proposed QATR for acceptability to ensure the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied.

Appendix B, “Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants,” to 10 CFR Part 50 establishes QA requirements for the design, fabrication, construction, and testing of structures, systems, and components (SSCs) of the facility. The pertinent requirements of Appendix B to 10 CFR Part 50 apply to all activities affecting the safety-related functions of SSCs and include designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modifying.

3.0 EVALUATION

In evaluating the adequacy of the GEH QATR, the NRC staff used the guidance contained in NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants,” SRP Section 17.5, “Quality Assurance Program Description – Design Certification, Early Site Permit and New License Applicants,” Revision 1, dated August 2015 (Ref. 3) hereafter referred to as standard review plan (SRP) Section 17.5, which provides acceptance criteria for design certification, early site permit, combined operating license, construction permit, and operating license applicants. SRP Section 17.5 is based on American Society of Mechanical Engineers (ASME) Standard NQA-1-2008 Edition and the NQA-1a-2009 Addenda, as supplemented by additional regulatory and industry guidance for nuclear operating facilities. ASME Standard NQA-1-2008 Edition and the NQA-1a-2009 Addenda, upon which the

GEH QATR is based, incorporated the supplemental guidance into a single document, and is, therefore, in alignment with SRP Section 17.5. In addition, NQA-1-2008 Edition and the NQA-1a-2009 Addenda, is endorsed by NRC Regulatory Guide 1.28, "Quality Assurance Program Requirements (Design and Construction)," Revision 4.

The proposed changes made to GEH's QATR, Revision 13, include minor editorial changes and changes to the organizational structure within GEH. In a conference call held on November 9, 2017, GEH staff provided clarification for organizational changes regarding the reporting structure of the Profit and Loss (P&L) Business Leaders, Nuclear Oversight Quality, and P&L Quality Leaders. GEH clarified that the dotted lines between P&L Business leaders and P&L Quality leaders and the dotted lines between Nuclear Oversight Quality and P&L Quality leaders, as shown in Figure 1 of Revision 13 to the QATR, provide flexibility for the management of resources in implementing the quality requirements set forth in the QATR; however, Nuclear Oversight Quality maintains responsibility for the final release of products to the customer.

The NRC staff verified that the revised GEH QATR continues to ensure that persons and organizations performing quality assurance functions have the required authority and organizational freedom, and remain sufficiently independent from cost and schedule when opposed to safety considerations.

4.0 CONCLUSION

The NRC staff used the acceptance criteria of NUREG-0800, Section 17.5 as the basis for evaluating the acceptability of the GEH QATR, NEDO-11209-A, Revision 13 for conformance with the applicable requirements of Appendix B to 10 CFR Part 50. The NRC staff concludes that GEH's QATR, NEDO-11209-A, Revision 13, follows the NRC guidance contained within and conforms to the format of NUREG-0800, Section 17.5, complies with Appendix B to 10 CFR Part 50 requirements for the QA program and, therefore, is acceptable.

5.0 REFERENCES

1. GE Hitachi Nuclear Energy Amendment to NEDO-11209-A, Revision 13, October 6, 2017, "GE Hitachi Nuclear Energy Quality Assurance Program Description" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML17279A629).
2. Safety Evaluation of General Electric Hitachi GE Hitachi Nuclear Energy, Quality Management System, Quality Assurance Topical Report, NEDO-11209, Revision 12, Quality Assurance Program Description (CAC NO. MF7028), June 6, 2016 (ADAMS Accession No. ML16138A359).
3. NUREG-0800, Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition, Section 17.5 Revision 1, "Quality Assurance Program Description – Design Certification, Early Site Permit and New License Applicants," August 2015 (ADAMS Accession No. ML15037A441).

Principal Contributor: Ashley Ferguson, NRO

Date: January 10, 2018

June 6, 2016

Mr. Jerald G. Head
Senior Vice President, Regulatory Affairs
General Electric-Hitachi
Nuclear Energy Americas, LLC
P.O. Box 780, M/C A-18
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SUBJECT: FINAL SAFETY EVALUATION FOR GENERAL ELECTRIC HITACHI NUCLEAR ENERGY AMERICAS, LLC AMENDMENT TO NEDO-11209-A REVISION 12, "GE HITACHI NUCLEAR ENERGY QUALITY ASSURANCE PROGRAM DESCRIPTION," (CAC NO. MF7028)

Dear Mr. Head:

By letter dated October 14, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15287A009), GE Hitachi Nuclear Energy Americas, LLC (GEH) submitted Amendment to NEDO-11209-A Revision 12, "GE Hitachi Nuclear Energy Quality Assurance Program Description," to the U.S. Nuclear Regulatory Commission (NRC) staff for review.

By letter dated May 6, 2016, an NRC draft safety evaluation (SE) regarding our approval of NEDO-11209-A, Revision 12, was provided for your review and comment (ADAMS Accession No. ML16110A324). By letter dated May 16, 2016, (ADAMS Accession No. ML16137A542) you replied that you had no comments.

The NRC staff has found that Amendment to NEDO-11209-A, Revision 12, is acceptable for referencing in licensing applications for nuclear power plants to the extent specified and under the limitations delineated in the Amendment and in the enclosed final SE. The final SE defines the basis for our acceptance of the Amendment.

Our acceptance applies only to material provided in the subject Amendment. We do not intend to repeat our review of the acceptable material described in the Amendment. When the Amended Topical Report (TR) appears as a reference in license applications, our review will ensure that the material presented applies to the specific plant involved. License amendment requests that deviate from this Amended TR will be subject to a plant-specific review in accordance with applicable review standards.

In accordance with the guidance provided on the NRC website, we request that GEH publish the approved Amendment to TR NEDO-11209-A, Revision 12, within three months of receipt of this letter. The approved version shall incorporate this letter and the enclosed final SE Supplement after the title page. Also, it must contain historical review information, including NRC requests for additional information and your responses. The approved version shall include an "-A" (designating approved) following the TR identification symbol.

J. Head

- 2 -

If future changes to the NRC's regulatory requirements affect the acceptability of this TR, GEH will be expected to revise the TR appropriately. Licensees referencing this TR would be expected to justify its continued applicability or evaluate their plant using the revised TR.

Sincerely,

/RA/

Kevin Hsueh, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 710

Enclosure:
Final SE

cc w/encl: See next page

J. Head

- 2 -

If future changes to the NRC's regulatory requirements affect the acceptability of this TR, GEH will be expected to revise the TR appropriately. Licensees referencing this TR would be expected to justify its continued applicability or evaluate their plant using the revised TR.

Sincerely,

/RA/

Kevin Hsueh, Chief
Licensing Processes Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

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ADAMS Accession No.: ML16138A359; *concurred via e-mail NRR-106

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| DATE | 5/26/2016 | 05/24/2016 | 5/31/2016 | 6/6/2016 |

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Project No. 710

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FINAL SAFETY EVALUATION BY THE
OFFICE OF NEW REACTORS
OF GENERAL ELECTRIC HITACHI NUCLEAR ELECTRIC, QUALITY
ASSURANCE TOPICAL REPORT NEDO-11209-A, REVISION 12, "GE HITACHI
NUCLEAR ENERGY QUALITY ASSURANCE PROGRAM DESCRIPTION"
(CAC NO. MF7028)

1.0 INTRODUCTION

By letter dated October 14, 2015 (Reference 1), General Electric Hitachi Nuclear Energy (GEH) submitted an amendment to Quality Assurance Topical Report (QATR) NEDO 11209-A, Revision 12, "GE Hitachi Nuclear Energy Quality Assurance Program Description," to the U.S. Nuclear Regulatory Commission (NRC) for review and approval in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.4(b)(7)(ii). GEH proposed that this updated QATR would replace the current QATR for GEH, which was approved by NRC as documented in a safety evaluation report (SER) dated October 20, 2014 (Reference 6).

During its review, the NRC staff determined that additional information was required to complete its review. On February 8, 2016 (Reference 2) and April 11, 2016 (Reference 3), the NRC transmitted two requests for additional information (RAIs) that were necessary complete the staff's review of QATR Revision 12. By letter dated March 2, 2016, and electronic correspondence dated April 15, 2016, GEH responded to the staff's RAIs (Reference 4 and Reference 5).

2.0 REGULATORY BASIS

The Commission's regulatory requirements related to Quality Assurance (QA) programs for non-licensees are set forth in 10 CFR 50.4(b)(7)(ii). This regulation requires that a change to a NRC-accepted QA program description from non-licensees (i.e., architect/engineers, nuclear steam system suppliers, fuel suppliers, constructors, etc.) must be submitted to the NRC. The NRC will review the proposed QATR for acceptability to ensure the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied.

Enclosure

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Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50 establishes QA requirements for the design, fabrication, construction, and testing of structures, systems, and components (SSCs) of the facility. The pertinent requirements of Appendix B to 10 CFR Part 50 apply to all activities affecting the safety-related functions of SSCs and include designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modifying.

3.0 EVALUATION

In evaluating the adequacy of the GEH QATR, the NRC staff used the guidance contained in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," SRP Section 17.5, "Quality Assurance Program Description – Design Certification, Early Site Permit and New License Applicants," Revision 1, dated August 2015 (Reference 7) hereafter referred to as standard review plan (SRP) Section 17.5, which provides acceptance criteria for design certification, early site permit, combined operating license, construction permit, and operating license applicants. SRP Section 17.5 is based on American Society of Mechanical Engineers (ASME) Standard NQA-1-2008 Edition and the NQA-1a-2009 Addenda, as supplemented by additional regulatory and industry guidance for nuclear operating facilities. ASME Standard NQA-1-2008 Edition and the NQA-1a-2009 Addenda, upon which the GEH QATR is based, incorporated the supplemental guidance into a single document, and is therefore in alignment with SRP Section 17.5. In addition, NQA-1-2008 Edition and the NQA-1a-2009 Addenda, is endorsed by NRC Regulatory Guide (RG) 1.28, "Quality Assurance Program Requirements (Design and Construction)," Revision 4.

The proposed changes made to QATR Revision 12, include the following:

- Minor editorial changes spelling corrections, punctuation, administrative improvements, and clarifications to reflect the current organization within General Electric and GEH. The staff verified that the revised GEH QATR continues to ensure that persons and organizations performing quality assurance functions have the required authority and organizational freedom, and remain sufficiently independent from cost and schedule when opposed to safety considerations.
- In addition to the minor editorial changes, GEH added Section 4.4, "Graded Approach to Quality," to PART III, "Supplemental Details," of the QATR. The NRC staff submitted RAI 1 (Reference 2) requesting additional details how GEH planned to implement Section 4.4. GEH's response to RAI 1 (Reference 4) described that the graded approach to quality only applies to non-basic components. For example, it applies to SSCs with a Safety-Related Classification of "S" (Special) in Tier 2 Table 3.2-1 of the Economic Simplified Boiling Water Reactor Design Control Document (ESBWR DCD), Revision 10 dated April 2014, as certified by the US NRC (Reference 8). The ESBWR DCD

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elevates many SSCs that would have been classified as “Non-Safety Related” under Appendix B to 10 CFR Part 50, in order to apply more rigorous quality requirements (see Note 5 of Tier 2 Table 3.2-1 of the ESBWR DCD). In addition, GEH in their response described that they may apply the classification of Special to products and services provided to international nuclear power plants not covered by Appendix B to 10 CFR Part 50 or 10 CFR Part 21 to ensure that applicable international regulations, codes, and standards are met. GEH’s use of a graded approach to quality meets the requirements of Appendix B to 10 CFR Part 50 in that GEH applies all applicable Appendix B to 10 CFR Part 50 requirements, as described by ASME in NQA-1-2008 Edition and supplemented by NQA-1a-2009 Addenda, to all basic components as defined by 10 CFR Part 21. The NRC staff found this approach to be acceptable.

- The proposed amendment to QATR Revision 12 also included a commitment to implement the quality assurance program alternative of the Nuclear Energy Institute (NEI) Technical Report NEI 14-05, Revision 1, "Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," dated August 2014 (Reference 9). The NRC staff concluded, in an SER dated February 9, 2015 (Reference 10), that NEI 14-05, Revision 1, provided an acceptable approach for licensees and suppliers subject to the QA requirements of Appendix B to 10 CFR Part 50, for using laboratory accreditation by Accreditation Bodies that are signatories to the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA) in lieu of performing commercial-grade surveys as part of the commercial-grade dedication process for procurement of calibration and testing services performed by domestic and international laboratories accredited by signatories to the ILAC MRA.

The proposed change was deemed to constitute a reduction in commitment. The NRC staff’s review verified that GEH correctly implemented the requirements of NEI 14-05, Revision 1. NEI 14-05, Revision 1, Section 4, “Purchaser’s Quality Assurance Program,” states, in part, that "Purchasers that rely on the accreditation by ILAC signatories in lieu of commercial-grade surveys are required by 10 CFR Part 50, Appendix B to document this alternative method in their QA Program. A Template for describing the use of the ILAC process in lieu of a commercial-grade survey in a Purchaser’s QA Program is provided in Appendix A. Although a Purchaser is not required to use the Template in Appendix A, all of the actions and steps described in Appendix A need to be included in the Purchaser’s QA Program.”

Section 7.10, “Commitment,” of PART II, “QAPD Details,” was revised to include guidance proposed by GEH to implement the requirements of NEI 14-05, Revision 1. The proposed change to this section, as described, did not address the requirements of this alternative as outlined in NEI 14-05, Revision 1. The NRC staff electronically transmitted RAI 2 (Reference 3) requesting clarification on how GEH planned to meet the requirements of NEI 14-05, Revision 1 in its QATR. In response (Reference 5), GEH revised Section 7.10 to include all the requirements listed in Appendix A of NEI 14-05, Revision 1. The NRC staff found this approach to be acceptable.

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3.0 CONCLUSION

The NRC staff used the acceptance criteria of NUREG-0800, Section 17.5 as the basis for evaluating the acceptability of the GEH QATR, NEDO-11209-A, Revision 12 for conformance with the applicable requirements of Appendix B to 10 CFR Part 50. The NRC staff concludes that GEH's Quality Assurance Topical Report NEDO-11209-A Revision 12, follows the NRC guidance contained within and conforms to the format of NUREG-0800, Section 17.5, complies with Appendix B to 10 CFR Part 50 requirements for the QA program, and is therefore, acceptable.

4.0 REFERENCES

1. GE Hitachi Nuclear Energy Amendment to NEDO-11209-A, Revision 12, dated October 14, 2015, "GE Hitachi Nuclear Energy Quality Assurance Program Description" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15287A009).
2. NRC letter to GE Hitachi Nuclear Energy, "Request for Additional Information Regarding Review of Amendment to NEDO-11209-A Revision 12, GE Hitachi Nuclear Energy Quality Assurance Program Description," dated February 8, 2016 (ADAMS Accession No. ML16005A572).
3. NRC electronic correspondence to GE Hitachi Nuclear, "Request for Additional Information Regarding Review of Amendment to NEDO-11209-A Revision 12, "GE Hitachi Nuclear Energy Quality Assurance Program Description," dated April 11, 2016 (ADAMS Accession No. ML16102A443)
4. GE Hitachi Nuclear Energy letter to NRC, "NRC Request for Additional Information Regarding Review of Amendment to NEDO-11209-A Revision 12, GE Hitachi Nuclear Energy Quality Assurance Program Description," dated March 2, 2016 (ADAMS Accession No. ML16063A013)
5. GE Hitachi Nuclear Energy electronic correspondence to NRC, "NRC Request for Additional Information Regarding Review of Amendment to NEDO-11209-A Revision 12, GE Hitachi Nuclear Energy Quality Assurance Program Description," dated April 15, 2016 (ADAMS Accession Nos. ML16106A161).
6. Safety Evaluation of General Electric Hitachi GE Hitachi Nuclear Energy, Quality Management System, Quality Assurance Topical Report, NEDO-11209, Revision 11, Quality Assurance Program Description (TAC NO. MF3792), dated October 20, 2014 (ADAMS Accession No. ML14267A483)
7. NUREG-0800, Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition, Section 17.5 Revision 1, "Quality Assurance

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Program Description – Design Certification, Early Site Permit and New License Applicants," dated August 2015, (ADAMS Accession No. ML15037A441).

8. NUREG-1966 "Final Safety Evaluation Report Related to the Certification of the Economic Simplified Boiling-Water Reactor Standard Design" (ADAMS Accession No. ML14100A304)
9. Submittal of NEI 14-05, Revision 1, "Guidelines for the Use of Accreditation in Lieu of Commercial-Grade Surveys for Procurement of Laboratory Calibration and Test Services," dated August 31, 2014 (ADAMS Accession No. ML14245A392).
10. Final Safety Evaluation for Technical Report NEI 14-05, Guidelines for the use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services, Revision 1 dated February 9, 2015 (ADAMS Accession No. ML14322A535)

Principal Contributor: Jonathan Ortega-Luciano, NRO

Date:

January 16, 2015

Mr. Jerald G. Head
Senior Vice President, Regulatory Affairs
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Wilmington, NC 28401-0780

SUBJECT: FINAL SAFETY EVALUATION FOR GENERAL ELECTRIC HITACHI NUCLEAR ENERGY AMERICAS, LLC TOPICAL REPORT NEDO-11209, "GE HITACHI NUCLEAR ENERGY QUALITY ASSURANCE PROGRAM DESCRIPTION," REVISION 11 (TAC NO. MF3792)

Dear Mr. Head:

By letter dated March 31, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14090A330), GE Hitachi Nuclear Energy Americas, LLC (GEH) submitted Topical Report (TR) NEDO-11209, "GE Hitachi Nuclear Energy Quality Assurance Program Description" Revision 11, to the U.S. Nuclear Regulatory Commission (NRC) staff for review.

By letter dated November 14, 2014, an NRC draft safety evaluation (SE) regarding our approval of NEDO-11209, Revision 11, was provided for your review and comment (ADAMS Accession No. ML14316A349). The NRC staff's disposition of the GEH comments on the draft SE are presented in the attachment to the final SE enclosed with this letter.

The NRC staff has found that NEDO-11209, Revision 11, is acceptable for referencing in licensing applications for nuclear power plants to the extent specified and under the limitations delineated in the TR and in the enclosed final SE. The final SE defines the basis for our acceptance of the TR.

Our acceptance applies only to material provided in the subject TR. We do not intend to repeat our review of the acceptable material described in the TR. When the TR appears as a reference in license applications, our review will ensure that the material presented applies to the specific plant involved. License amendment requests that deviate from this TR will be subject to a plant-specific review in accordance with applicable review standards.

In accordance with the guidance provided on the NRC website, we request that GEH publish the approved TR NEDO-11209, Revision 11, within three months of receipt of this letter. The approved version shall incorporate this letter and the enclosed final SE Supplement after the title page. Also, it must contain historical review information, including NRC requests for additional information and your responses. The approved version shall include an "-A" (designating approved) following the TR identification symbol.

If future changes to the NRC's regulatory requirements affect the acceptability of this TR, GEH and/or licensees referencing it will be expected to revise the TR appropriately, or justify its continued applicability for subsequent referencing.

Sincerely,

/RA/

Aby S. Mohseni, Deputy Director
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 710

Enclosure: Final Safety Evaluation

cc w/encl: See next page

If future changes to the NRC's regulatory requirements affect the acceptability of this TR, GEH and/or licensees referencing it will be expected to revise the TR appropriately, or justify its continued applicability for subsequent referencing.

Sincerely,

/RA/

Aby S. Mohseni, Deputy Director
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Project No. 710

Enclosure: Final Safety Evaluation

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| DATE | 1 / 5 /2014 | 12/19/2014 | 1 / 7 /2014 | 1 / 14 /2014 | 1/16/2014 |

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Project No. 710

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SAFETY EVALUATION BY THE OFFICE OF NEW REACTORS
GENERAL ELECTRIC (GE) HITACHI NUCLEAR ENERGY AMERICAS, LLC.
QUALITY MANAGEMENT SYSTEM, QUALITY ASSURANCE TOPICAL REPORT
NEDO-11209, REVISION 11 "GE HITACHI NUCLEAR ENERGY QUALITY
ASSURANCE PROGRAM DESCRIPTION" PROJECT NO. 710

1.0 INTRODUCTION

By letter dated March 31, 2014 (Reference 1), GEH submitted quality management system (QMS) quality assurance (QA) topical report (QATR) NEDO-11209, Revision 11, "GE Hitachi Nuclear Energy Quality Assurance Program Description [QAPD]," to the U.S. Nuclear Regulatory Commission (NRC) for review and approval in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.4(b)(7)(ii). GEH proposed that this updated QATR would replace the current QATR for GEH, which was approved by the NRC as documented by letter dated January 11, 2011 (Reference 5).

2.0 REGULATORY BASIS

The NRC regulatory requirements related to QA programs for non-licensees are set forth in 10 CFR 50.4(b)(7)(ii). This regulation requires that a change to an NRC accepted QATR from non-licensees (i.e., architect/engineers, nuclear steam supply system (NSSS) suppliers, fuel suppliers, constructors, etc.) must be submitted to the NRC. When requested, the NRC will review the proposed QATR for acceptability to ensure the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied.

Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50 establishes QA requirements for the design, construction, and operation of structures, systems, and components (SSCs) of nuclear facilities. The relevant requirements of Appendix B to 10 CFR Part 50 apply to all activities affecting the safety-related functions of those SSCs including their design, purchase, fabrication, handling, shipping, storage, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modification.

3.0 TECHNICAL EVALUATION

In evaluating the adequacy of the GEH QMS QATR, the NRC staff used the guidance contained in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," SRP Section 17.5, "Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants," dated March 2007 (Reference 4) hereafter referred to as standard review plan (SRP) Section 17.5, which provides acceptance criteria for design certification, early site permit, combined operating license, construction permit, and operating license applicants. SRP Section 17.5 is based on American Society of Mechanical Engineers

(ASME) Standard NQA-1-1994 Edition, as supplemented by additional regulatory and industry guidance for nuclear operating facilities. ASME Standard NQA-1-2008 and the NQA-1a-2009 Addenda, upon which the GEH QATR is based, incorporated the supplemental guidance into a single document, and is therefore in alignment with SRP Section 17.5. In addition, NQA-1-2008 and the NQA-1a-2009 Addenda, hereafter referred to as NQA-1-2008, is endorsed by NRC Regulatory Guide (RG) 1.28, "Quality Assurance Program Requirements (Design and Construction)," Revision 4.

3.1 BACKGROUND

The proposed GEH QMS QATR is similar in many respects to previous submittals approved for licensees in accordance with NUREG-0800, Section 17.5. The original QAPD was based largely on commitments to the following: (1) Appendix B of 10 CFR Part 50, (2) RG 1.28, "Quality Assurance Program Requirements (Design and Construction)," (3) ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants," and (4) applicable sections of the ASME Boiler and Pressure Vessel Code.

This QATR is based on GEH commitment to 10 CFR Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," and ASME Nuclear Quality Assurance (NQA) Standard NQA-1-2008, "Quality Assurance Requirements for Nuclear Facility Applications" and NQA-1a-2009 Addenda. The QATR is organized into eighteen basic sections corresponding to the quality requirements delineated in Appendix B to 10 CFR Part 50 and is responsive to both Appendix B, as applicable, and the regulatory guidance set forth in RG 1.28, Revision 4. GEH considers the collective requirements of the QATR and NQA-1-2008 and NQA-1a-2009 Addenda equivalent to the NRC staff guidance in SRP Section 17.5.

NUREG-0800, SRP Section 17.5 outlines the NRC staff review of a standardized QA program and is based on the following documents: (1) ASME Standard NQA-1 (1994 Edition); (2) RG 1.8, "Qualification and Training of Personnel for Nuclear Power Plants;" (3) RG 1.28, "Quality Assurance Program Requirements (Design and Construction);" (4) RG 1.33, "Quality Assurance Program Requirements (Operation);" and (5) NRC Review Standard 002, "Processing Applications for Early Site Permits." The review approach of SRP Section 17.5 has previously been used by the NRC staff for evaluating the NQA-1-1994 standard as the basis for a QA Program.

3.2 EVALUATION

The NRC staff evaluated the adequacy of the GEH QMS QATR in describing how the requirements of Appendix B to 10 CFR Part 50 will be satisfied. The format and content of the QATR were evaluated in accordance with the guidance of Section 17.5, which provides a basis for the NRC staff's review of QA programs based on the NQA-1-2008 Standard. The acceptability of the level of detail provided by the QATR is in part determined by its adequacy in addressing the acceptance criteria of SRP Section 17.5.

In January 2011, the U.S. NRC staff approved NEDO-11029, "GE Hitachi Quality Assurance Program Description," Revision 9. In March 2014, GEH submitted

Revision 11 to the NRC, but did not submit Revision 10. GEH provided Enclosure 2, "Roadmap for NEDO-11209, Revision 11," which covered NEDO-11209, Revision 9 mapping to Revision 10 and 11. In the Table, the NRC staff identified five changes made in NEDO-11209, Revision 10, to Section 1.1, Section 1.4.2.2, Section 1.4.3.1, and Section 18.4.

On August 18, 2014, the NRC staff requested that GEH (Reference 6) verify that these were all the QA changes made to NRC approved NEDO-11209, Revision 9, that were incorporated into NEDO-11209, Revision 10. The NRC staff's purpose was to verify that GEH's Revision 10 of the QAPD remained acceptable in accordance with 10 CFR 50.4(b)(7)(ii). This was Request for Additional Information (RAI) 1. On August 29, 2014, GEH responded to RAI 1 (Reference 7). The NRC staff confirmed that all of the QA changes made in GEH NEDO-11209, Revision 10, were acceptable and incorporated into GEH NEDO-11209, Revision 11. This resolved RAI 1.

3.2.1 Format and Content of the QATR

The format used for the NRC staff's evaluation followed the sequence of the 18 criteria of Appendix B and corresponding provisions of NQA-1. The QATR provides guidance for establishing a top-level policy document that defines the quality requirements and assigns major functional responsibilities. The GEH QATR applies to work involving SSCs for nuclear power plants and fuel reprocessing plants that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. It is incumbent upon the client to identify the specific QA requirements that must be met for the scope of vendor QA scope of work activities.

3.2.1.1 ORGANIZATION

In Part II, "QAPD Details," Section 1.0, "ORGANIZATION," GEH made the following organizational changes: (1) added ISO9001 and GS-R-1 industry guidance; (2) added Nuclear Fuels & Services subsection 1.3.1.1; (3) added Nuclear Plant Projects subsection 1.3.1.2; (4) modified Nuclear Oversight Organization in subsection 1.3.2 to add support organizations; (5) renamed "Nuclear Oversight" in subsection 1.3.3 with added support organizations; (6) removed duplicate items in subsection 1.4.1 for the President and Chief Executive Officer, and moved duplicate items to the GEH QAPD Statement of Policy and added responsibility items 2 and 4; (7) renamed the "Quality Leader," as the Nuclear Oversight Senior Vice President," and added responsibility items 2, 3, and 5; (8) renamed the "Nuclear Quality Assurance Leader," as the "Quality Oversight Leader in subsection 1.4.2.1 with clarified responsibilities for this position; (9) modified the responsibilities to remove audit functions for Profit and Loss Quality Leaders in subsection 1.4.3.1; (10) added the Sourcing General Manager in subsection 1.4.4; (11) added the responsibilities of employees and contractors in Section 1.5; (12) updated organizational structures and clarified conditions for issuing a "stop work;" in Section 1.6; and (13) added section with delegation authority inside the GEH Organization in Section 1.7.

In Section 1.8, "Commitments," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion I, and NQA-1-2008 and NQA-1a-2009, Addenda, Requirement 1. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in

QAPD Section 1.0 and concluded that the controls for the organizational structure meet the guidance in SRP Section 17.5, Section A, "ORGANIZATION (Criteria I)."

3.2.1.2 QUALITY ASSURANCE PROGRAM (QAP)

In Part II, "QAPD Details," GEH made changes to QAPD Section 2.0, "QUALITY ASSURANCE PROGRAM." The NRC staff reviewed and found acceptable the minor editorial changes to QAPD Sections 2.1, "General," through 2.7, "Grace Period." However, GEH made significant QAP management changes to QAPD Section 2.8, "Quality Assurance Program Description Management." Specifically, changes to QAPD Section 2.8 included:

1. Changes that are made to the QAPD are submitted to the NRC for review and approval per 10 CFR 50.4(b)(7)(ii).
2. In addition to QAP changes involving administrative improvements and clarifications, spelling corrections, punctuation, or editorial items, the following changes are not considered to be reductions in commitment:
 - (a) The use of a QA standard approved by the NRC which is more recent than the QA standard in the QAPD at the time of the change;
 - (b) The use of a QA alternative or exception approved by an NRC safety evaluation, provided that the bases of the NRC approval are applicable to GEH;
 - (c) The use of generic organizational position titles that clearly denote the position function, supplemented as necessary by descriptive text, rather than specific titles;
 - (d) The use of generic organizational charts to indicate functional relationships, authorities, and responsibilities, or, alternately, the use of descriptive text;
 - (e) The elimination of QAP information that duplicates language in quality assurance RGs and QA standards to which GEH is committed;
 - (f) Organizational revisions that ensure that persons and organizations performing QA functions continue to have the requisite authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations; and
 - (g) Any change to Part III, "Supplemental Details," or Part IV, "References," that do not entail NRC related standards (i.e., ISO 9001, KTA-1401, GS-R-3).

The NRC staff reviewed the regulations in 10 CFR 50.54(a)(3)(i) through 10 CFR 50.54(a)(3)(vi) and determined that GEH QAPD Section 2.8, Items (a) through (f) noted above, are not applicable to GEH since GEH is an NSSS vendor, not a licensee. The

requirements of 10 CFR 50.4(b)(7)(ii) for changes to a vendor's QA program do not permit vendors to evaluate whether or not changes to an NRC accepted vendor QAPD are reductions in commitment. The NRC staff requested that GEH clarify its process for evaluating potential reductions in commitment. On August 18, 2014, the NRC staff sent GEH NRC RAI 2 on this issue (Reference 6).

On August 29, 2014, GEH responded to RAI 2 (Reference 7). On September 11, 2014, the NRC staff conducted a conference call with GEH to clarify GEH's use of 10 CFR 50.54(a)(3) and 10 CFR 50.54(a)(4). The NRC staff reiterated an Office of General Counsel interpretation on the applicability of this regulation. On September 23, 2014, GEH again responded to RAI 2 by removing use of the regulations in 10 CFR 50.54(a)(3) and 10 CFR 50.54(a)(4) for QA reductions in commitments (Reference 8). GEH submitted changes to the GEH QAPD, Revision 11, appropriately applying the regulation in 10 CFR 50.4(b)(7)(ii). This resolved RAI 2.

With respect to Part III, "Supplemental Details," and Part IV, "References," that do not involve NRC regulations or related standards (i.e., ISO 9001, GS-R-3, KTA-1401, and GS-R-3), the NRC staff determined that GEH may use these industry standards at their own discretion without prior NRC review and approval as long as these industry standards do not conflict with 10 CFR Part 50, Appendix B, for safety related components.

In GEH QATR QAPD Section 2.9, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion II, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 2. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 2.0 and concluded that the controls for the QAP meet the guidance in SRP Section 17.5, Section B, "QUALITY ASSURANCE PROGRAM (Criteria II)."

3.2.1.3 DESIGN CONTROL

In Part II, "QAPD Details," GEH made changes to Section 3.0, "DESIGN CONTROL." The NRC staff reviewed and found acceptable editorial changes to the QAPD which added: (1) Sections 3.2, "Design Inputs," (2) Subsection 3.3.3, "Design Results;" bullet items 4, 5, and 6; (3) Subsection 3.4.3, "Design and Development Review;" (4) Subsection 3.5.4, "Extent of Design Verification;" added item 1 with the words "state of the art;" (5) Subsection 3.5.6, "Design and Development Validation," and (6) Section 3.6, "Change Control," added items 7 and 8.

In GEH QATR QAPD Section 3.10, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion III, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 3. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 3.0 and concluded that the controls for design meet the guidance in SRP Section 17.5, Section C, "DESIGN CONTROL AND VERIFICATION (Criteria III)."

3.2.1.4 PROCUREMENT DOCUMENT CONTROL

In Part II, "QAPD Details," GEH made minor editorial changes to Section 4.0, "PROCUREMENT DOCUMENT CONTROL." In Section 4.5, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion IV, NQA-1-2008 and NQA-1a-2009 Addenda, Requirement 4. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 4.0 and concluded that the controls for procurement documents meet the guidance in SRP Section 17.5, Section D, "PROCUREMENT DOCUMENT CONTROL (Criteria IV)."

3.2.1.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

In Part II, "QAPD Details," GEH made minor editorial changes to GEH QAPD Section 5.0, "INSTRUCTIONS, PROCEDURES AND DRAWINGS." In Section 5.4, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion V, NQA-1-2008 and NQA-1a-2009 Addenda, Requirement 5. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 5.0 and concluded that the controls for instructions, procedures, and drawings meet the guidance in SRP Section 17.5, Section E, "INSTRUCTIONS, PROCEDURES, AND DRAWINGS (Criteria V)."

3.2.1.6 DOCUMENT CONTROL

In Part II, "QAPD Details," GEH made minor editorial changes to GEH QAPD Section 6.0, "DOCUMENT CONTROL." In Section 6.5, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion VI and NQA-1-2008 Edition with the NQA-1a-2009 Addenda, Requirement 6. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 6.0 and concluded that the controls for documents meet the guidance in SRP Section 17.5, Section F, "DOCUMENT CONTROL (Criteria VI)."

3.2.1.7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

In Part II, "QAPD Details," GEH made changes to Section 7.0, "CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES."

1. In GEH QATR QAPD Section 7.10, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion VII, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 7, with the following exceptions:

- GEH considers 10 CFR Part 50 licensees, Authorized Nuclear Inspection Agencies, National Institute of Standards and Technology, or other State and Federal agencies, which may provide items or services to GEH, as not requiring evaluation or audit.
- When purchasing commercial grade calibration services from a calibration laboratory, procurement source evaluation and selection measures need not be performed provided each of the following conditions are met:

- The purchase documents impose any additional technical and administrative requirements, as necessary, to comply with the GEH QAP and technical provisions. At a minimum, the purchase document will require that the calibration certificate/report include identification of the laboratory equipment/standard used.
 - The purchase documents require reporting as-found calibration data when calibrated items are found to be out-of-tolerance.
 - A documented review of the supplier's accreditation will be performed and will include a verification of each of the following:
 - The calibration laboratory holds a domestic accreditation by the National Voluntary Laboratory Accreditation Program (NVLAP), the American Association for Laboratory Accreditation (A2LA), ACLASS Accreditation Services, Laboratory Accreditation Bureau (LAB), International Accreditation Services (IAS) or Perry Johnson Laboratory Accreditation, Inc. (PJLA) as recognized through the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA).
 - The accreditation is based on ANS/ISO/IEC 17025, "General Requirements for the Competence of Testing and Calibration Laboratories".
 - The published scope of accreditation for the calibration laboratory covers the necessary measurement parameters, ranges, and uncertainties.
2. The GEH program for dedication of commercial-grade items commits to be consistent with the following:
- NQA-1a-2009, Subpart 2.14,
 - EPRI NP-5652, "Guideline for the Utilization of Commercial-Grade Items in Nuclear Safety Related Applications", 6/88 as endorsed and modified by the following NRC Generic Letters (GLs):
 - GL 89-02, Actions to Improve the Detection of Counterfeit and Fraudulently Marketed Products (3/89)
 - GL 91-05, "Licensee Commercial-Grade Procurement and Dedication Programs" (4/91)

As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 7.0 and concluded that the controls for purchased material, equipment, and services, including controls for commercial-grade calibration services and commercial-grade dedication, meet the guidance in Section 17.5. Section G, "CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES (Criteria VII)," Item 12b,

“Accreditation to ANSI/ISO/IEC 17025,” and Section V, “QA Program Commitments,” to GL 89-02 and GL 91-05.

3.2.1.8 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS

In Part II, “QAPD Details,” GEH made minor editorial changes to Section 8.0, “IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS.” In Section 8.6, “Commitment,” GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion VIII, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 8. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 8.0 and concluded that the controls for purchased material, parts, and components meet the guidance in SRP Section 17.5, Section H, “IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS (Criteria VIII).”

3.2.1.9 CONTROL OF SPECIAL PROCESSES

In Part II, “QAPD Details,” GEH made minor editorial changes to Section 9.0, “CONTROL OF SPECIAL PROCESSES.” In GEH QATR QAPD Section 9.6, “Commitment,” GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion IX, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 9. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 9.0 and concluded that the control of special processes meets the guidance in SRP Section 17.5, Section I, “CONTROL OF SPECIAL PROCESSES.”

3.2.1.10 INSPECTION

In Part II, “QAPD Details,” GEH made minor editorial changes to GEH QAPD Section 10.0, “INSPECTION.” In Section 10.6, “Commitment,” GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion X, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 10. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 10.0 and concluded that the controls for inspections meet the guidance in SRP Section 17.5, Section J, “INSPECTION.”

3.2.1.11 TEST CONTROL

In Part II, “QAPD Details,” GEH made minor editorial changes to Section 11.0, “TEST CONTROL.” In Section 11.6, “Commitment,” GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XI and NQA-1-2008 Edition with the NQA-1a-2009 Addenda, Requirement 11. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 11.0 and concluded that controls for tests meet the guidance in SRP Section 17.5, Section K, “TEST CONTROL.”

3.2.1.12 CONTROL OF MEASURING AND TEST EQUIPMENT

In Part II, "QAPD Details," GEH made minor editorial changes to GEH QAPD Section 12.0, "CONTROL OF MEASURING AND TEST EQUIPMENT." In Section 12.6, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XII, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 12. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 12.0 and concluded that the control of measuring and test equipment meets the guidance in SRP Section 17.5, Section L, "CONTROL OF MEASURING AND TEST EQUIPMENT."

3.2.1.13 HANDLING, SHIPPING, AND STORAGE

In Part II, "QAPD Details," GEH made no changes to GEH QAPD Section 13.0, "HANDLING, SHIPPING, AND STORAGE." In Section 13.6, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XIII, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 13. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 13.0 and concluded that the controls for handling, shipping and storage meet the guidance in SRP Section 17.5, Section M, HANDLING, STORAGE, AND SHIPPING."

3.2.1.14 INSPECTION, TEST, AND OPERATING STATUS

In Part II, "QAPD Details," GEH made no changes to Section 14.0, "INSPECTION, TEST, AND OPERATING STATUS." In Section 14.3, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XIV, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 14. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 14.0 and concluded that the controls for inspections, tests, and operating status meet the guidance in SRP Section 17.5, Section N, "INSPECTION, TEST, AND OPERATING STATUS."

3.2.1.15 NONCONFORMING MATERIAL AND COMPONENTS

In Part II, "QAPD Details," GEH made minor editorial changes to Section 15.0, "NONCONFORMING MATERIAL AND COMPONENTS." In Section 15.5, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XV, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 15. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 15.0 and concluded that the controls for nonconforming material and components meet the guidance in SRP Section 17.5, Section O, "NONCONFORMING MATERIAL AND COMPONENTS."

3.2.1.16 CORRECTIVE ACTION

In Part II, "QAPD Details," GEH made minor editorial changes to Section 16.0, "CORRECTIVE ACTION." In Section 16.5, Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XVI, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 16. As set forth above, the NRC staff reviewed the QA

measures to be implemented by GEH in QAPD Section 16.0 and concluded that the controls for corrective action meet the guidance in SRP Section 17.5, Section P, "CORRECTIVE ACTION."

3.2.1.17 QUALITY ASSURANCE RECORDS

In Part II, "QAPD Details," GEH made minor editorial changes to Section 17.0, "QUALITY ASSURANCE RECORDS." In GEH QATR QAPD Section 17.8, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XVII, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 17, GL 88-18, "Plant Records and Storage on Optical Disk," and Regulatory Information Summary (RIS) 2008-18, "Guidance on Managing Quality Assurance Records in Electronic Media." As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 17.0 and concluded that the controls for QA records meet the guidance in SRP Section 17.5, Section Q, "QUALITY ASSURANCE RECORDS."

3.2.1.18 AUDITS

In Part II, "QAPD Details," GEH made minor editorial changes to Section 18.0, "AUDITS." In GEH QATR QAPD Section 18.7, "Commitment," GEH commits to compliance with Appendix B to 10 CFR Part 50, Criterion XVIII, NQA-1-2008 and the NQA-1a-2009 Addenda, Requirement 18. As set forth above, the NRC staff reviewed the QA measures to be implemented by GEH in QAPD Section 18.0 and concluded that the controls for audits meet the guidance in SRP Section 17.5, Section R, "AUDITS."

3.2.1.19 GEH QATR QAPD, Part IV, REGULATORY COMMITMENTS

In Part IV, "REGULATORY COMMITMENTS," GEH commits to the following regulations and guidance documents in Part I and II:

- 10 CFR Part 50, Appendix B
- ASME NQA-1-2008 and the NQA-1a-2009, Part I in its entirety and Part II for those activities within GEH's scope as an NSSS supplier as described in contract specific quality plans.
- 10 CFR Part 21
- 10 CFR Part 70, Subpart D (70.22(f)) for licensing of special nuclear material
- 10 CFR Part 71
- 10 CFR Part 72, Subpart G for storage of radioactive material and waste
- Nuclear Information and Records Management Association, Inc. (NIRMA) Technical Guides (TGs) as endorsed by US NRC RIS 2000-18
- EPRI NP-5652, "Guideline for the Utilization of Commercial-Grade Items in Nuclear Safety Related Applications" (as endorsed and modified by US NRC GL 89-02, "Actions to Improve the Detection of Counterfeit and Fraudulently Marketed Products")
- ANS/ISO/IEC 17025, "General Requirements for the Competence of Testing and Calibration Laboratories"

- RG 1.28, Revision 4, 2010 – “Quality Assurance Program Requirements (Design and Construction)”
- GL 88-18, “Plant Record Storage on Optical Disks”
- GL 89-02, “Actions to Improve the Detection of Counterfeit and Fraudulently Marketed Products”
- GL 91-05, “Licensee Commercial-Grade Procurement and Dedication Programs”
- RIS 2000-18, “Guidance on Managing Quality Assurance Records in Electronic Media”

The NRC staff found that GEH did not commit to ASME NQA-1-2008 and NQA-1-2009a Addenda, Subpart 2.7, “Quality Assurance Requirements of Computer Software for Nuclear Facility Applications.” On August 18, 2014, the NRC staff requested additional information from GEH (Reference 6) to verify if GEH quality activities should include ASME NQA-1-2008/2009a Edition, Subpart 2.7. This was RAI 3.

On August 29, 2014, in GEH’s response to RAI 3 (Reference 7), GEH stated that “GEH will include a commitment to NQA-1-2008/2009a, Subpart 2.7, “Quality Assurance Requirements of Computer Software for Nuclear Facility Applications,” in Section 3.10 and 11.6 of the “A” (Approved Version) of NEDO-12209. Based on this GEH response, the NRC staff determined that RAI 3 is resolved.

4.0 CONCLUSIONS

The NRC staff evaluated GEH’s QATR QAPD, Revision 11 (Reference 1), reviewed the previous GEH submittal letter (Reference 2) on GEH QATR QAPD, Revision 9 (Reference 3) and the NRC approval letter and safety evaluation for GEH QATR QAPD, Revision 9 (Reference 5). The NRC staff concludes that GEH provided adequate responses (Reference 7 and 8) to resolve three NRC staff RAIs (Reference 6) in Sections 3.2.1.2 and 3.2.1.19 of this safety evaluation. The NRC staff also concludes that GEH’s QATR QAPD, Revision 11, including QA alternatives, adequately addresses the requirements of Appendix B to 10 CFR Part 50 and is acceptable.

5.0 REFERENCES

1. Letter from GE Hitachi Nuclear Energy (GEH) to NRC, MFN 14-108, Quality Assurance Topical Report (QATR) NEDO-11209, “GE Hitachi Nuclear Energy Quality Assurance Program Description,” Revision 11, dated March 31, 2014 (ADAMS Accession No. ML14090A330).
2. Letter from GE Hitachi Nuclear Energy (GEH) to NRC, MFN 10-354, “Response to NRC RAIs on GE Hitachi Nuclear Energy QATR NEDO-11209, Revision 9, “GE Hitachi Nuclear Energy Quality Assurance Program Description,” dated December 10, 2010 (ADAMS Accession No. ML103480313).

3. GEH QATR NEDO-11209, "GE Hitachi Nuclear Energy Quality Assurance Program Description," Revision 9, dated December 9, 2010 (ADAMS Accession No. ML103480314).
4. NRC NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants," Section 17.5, "Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants," dated March 2007 (ADAMS Accession No. ML06319009)
5. NRC Approval Letter for GEH QATR QAPD, Revision 9, dated January 11, 2011 (ADAMS Accession No. ML110110473)
6. NRC Letter to GEH, Request for Additional information RE: General Electric Hitachi (GEH) Quality Assurance Topical Report NEDO-11209, "GE Hitachi Nuclear Energy Quality Assurance Program Description," Revision 11, August 18, 2014 (TAC No. MF3792) (ADAMS Accession No. ML14217A387)
7. Letter from GEH to NRC, MFN 14-057, "GEH Response to NRC Request for Additional Information 2, dated August 29, 2014 Re: GE Hitachi (GEH) Quality Assurance Topical Report (QATR) NEDO-11209, GE Hitachi Nuclear Energy Quality Assurance Program Description," Revision 11, March 2014 (TAC No. MF3792) (ADAMS Accession No. ML14241A433)
8. Letter from GEH to NRC, MFN 14-057, Supplement 1, "GEH Response to RAI No. 2, dated September 23, 2014, RE: GEH QATR NEDO-11209, GEH Nuclear Energy QAPD," Revision 11, March 2014 (TAC No. MF3792) (ADAMS Accession No. ML14266A382).

Attachment: Resolution of Comment

Principal Contributor: Francis X. Talbot

Date:

RESOLUTION OF COMMENTS BY THE OFFICE OF NUCLEAR REACTOR

REGULATION ON DRAFT SAFETY EVALUATION FOR

TOPICAL REPORT NEDO-11209, REVISION 11,

“GE HITACHI NUCLEAR ENERGY QUALITY ASSURANCE PROGRAM

DESCRIPTION”

(TAC NO. MF3792)

| Location | Comment | NRC Disposition |
|--|---|--|
| Page 6, Section 3.2.1.3 “Design Control” | Item (3) Subsection 3.4.2, “Design and Development Review;” should be Subsection 3.4.3. | Comment accepted. Change made in final SE. |