



RANDALL L. KURTZ

Vice President
(312) 269-6562
(312) 735-8676 (Mobile)
randall.l.kurtz@sargentlundy.com

July 22, 2021

Proposed Revision to Sargent & Lundy (S&L)
Topical Report SL-TR-1
Quality Assurance (QA) Program

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001
Attention: Joeseph Holonich

On February 2, 2021, Sargent & Lundy (S&L) submitted Revision 26 of SL-TR-1 (ADAMS Accession No. ML21033A786) and requested a safety evaluation. On February 19, 2021 the Nuclear Regulatory Commission (NRC) transmitted the final safety evaluation via e-mail (under Nos. ML20322A454 and ML20322A019) to NEI for Revision 1 of NEI 14-05 A. The enclosed changes to SL-TR-1 Revision 26 are being submitted to facilitate S&L's future use of this recently issued safety evaluation.

Enclosed are revised pages for Revision 26 of SL-TR-1, including a revised summary of changes and Table of Contents, submitted to you in accordance with 10 CFR 50.4(b)(7)(ii). The Topical Report is non-proprietary. Please provide a safety evaluation for Revision 26 including these revised pages.

If you have any questions, please contact me at 312.735.8676.

Best Regards,

Randall L. Kurtz
Quality Assurance Director

RLK:arm
Enclosure



TABLE OF CONTENTS
FOR
QUALITY ASSURANCE PROGRAM

Summary of Changes	<u>REV.</u> 26
Statement of Policy	26
Title Page	26

<u>SECTION</u>	<u>TITLE</u>	<u>NUMBER OF PAGES</u>
00	Introduction	00-1 to -7
01	Organization	01-1 to -8
02	Quality Assurance Program	02-1 to -5
03	Design Control	03-1 to -8
04	Procurement Document Control	04-1 to -4
05	Instructions, Procedures and Drawings	05-1 to -2
06	Document Control	06-1 to -3
07	Control of Purchased Material, Equipment, and Services	07-1 to -8
08	Identification and Control of Materials, Parts, and Components	08-1 to -2
09	Control of Special Processes	09-1
10	Inspection	10-1 to -4
11	Test Control	11-1 to -3
12	Control of Measuring and Test Equipment	12-1 to -6
13	Handling, Storage, and Shipping	13-1 to -2
14	Inspection, Test, and Operating Status	14-1
15	Nonconforming Materials, Parts or Components	15-1 to -3
16	Corrective Action	16-1 to -2
17	Quality Assurance Records	17-1 to -4
18	Audits	18-1 to -5

SUMMARY OF CHANGES

Revision 26

1. (Section 00.00, Page 00-1) was revised to not limit the scope of S&L services to Engineering & Design. S&L intends to provide I&C integration services to its customers.
2. (Section 00.00, Page 00-1; Section 07.05, Page 07-6/7; Section 14.00, Page 14-1) was revised to replace 'nuclear plant' with 'nuclear facility'.
3. (Section 00.00, Page 00-3) was revised to change the committed edition of ASME NQA-1 to the 2008 with 2009 Addenda edition as approved in Regulatory Guide 1.28 Revision 4. This change includes the addition of a commitment to Subparts 2.2 and 2.14. This change also required reference updates to the following sections: 00.00, 1.01, 2.05, 10.07, 11.01, 14.01 and 17.04.
4. (Section 00.00, Page 00-4) was revised to update the commitment to Regulatory Guide 1.8 to Revision 4 dated June 2019. The exception related to commitment to the 1994 edition of NQA-1 was also removed as it is no longer required.
5. (Section 00.00, Page 00-5) was revised to add a commitment to Regulatory Guide 1.26 Revision 5 dated February 2017.
6. (Section 00.00, Page 00-5) was revised to add a commitment to Regulatory Guide 1.28 Revision 4 dated June 2010.
7. (Section 00.00, Page 00-6) was revised to add a commitment to Regulatory Guide 1.152 Revision 3 dated July 2011.
8. (Section 00.00, Page 00-6) was revised to update the commitment to Regulatory Guide 7.10 to Revision 3 dated June 2015. The exception noted with this commitment was also updated to reflect the change to the 2008 with 2009 Addenda Edition of ANSI/ASME NQA-1.
9. (Section 00.01, Page 01-7; Section 04.00 Page 04-1) were revised to remove 10 CFR 50.55(e) as this regulation is not applicable to the activities S&L or its suppliers are typically engaged in.
10. (Section 01.00, Page 01-1) was revised to reflect recent organizational changes. Two of the major changes are:
 - The Nuclear Power Technologies Group is now the Nuclear Power Group
 - The Director of Engineering, Chief Operations Officer and Director of Operations is subsumed under the single title of Director of Engineering & Innovation.
11. (Section 01.01, Pages 01-2 & 01-6) were revised to expand the scope to all required software documentation and not just verification and validation reports.
12. (Section 2.05, Page 02-4) was revised to incorporate the software design control and configuration management requirements added to Requirement 3 in the 2008/2009a edition of NQA-1.

13. (Section 2.05, Page 02-4) was revised to remove the last two lines of the paragraph. The process for temporary changes to computer programs is not included in the 2008/2009a edition of NQA-1.
14. (Sections 5.01 and 5.02, Page 05-1) were updated to reflect the change to the 2008 with 2009 Addenda Edition of ANSI/ASME NQA-1 regarding level of detail for instructions, procedures and drawings.
15. (Section 07.06, Page 07-7) was revised to reflect the addition of Subpart 2.14 in the 2008 with 2009 Addenda Edition of ANSI/ASME NQA-1 regarding Commercial Grade Dedication
16. (Section 07.03, Page 07-4) was revised to remove the specific reference to safety-related software as S&L suppliers provide items and services beyond software.
17. (Section 08.00, Page 08-1) was revised to add scope to the QA Program related to S&Ls identification and control of items.
18. (Section 10.02, Page 10-2) was revised to reflect the change in independence requirements between the 1994 and 2008/2009a editions of NQA-1.
19. (Section 11.01, Page 11-1) was revised to add scope to the QA Program related to S&Ls control of tests.
20. (Section 12.01, Page 12-1) was revised to reflect the guidance related to use of commercial grade calibration services outlined in NEI-14-05A Revision 1, as endorsed by [Final Safety Evaluation dated November 23, 2020 \(ML20322A456\)](#). Additionally, this section was revised to address requirements changes in the 2008/2009a edition of NQA-1 and to align with S&Ls planned scope of services.
21. (Section 13.00, Page 13-1) was revised to add scope to the QA Program related to S&Ls handling, storage and shipping of items.
22. (Section 15.00, Page 13-1) was revised add scope to the QA Program related to S&Ls control of nonconforming items.
23. (Section 17.10, Page 17-4) was revised to clarify the position related to the storage of electronic records associated with software.
24. (Section 18.04, Page 18-4) was revised to add 'organizations to be notified' to the requirements for an audit plan per NQA-1 requirements.

12.00 CONTROL OF MEASURING AND TEST EQUIPMENT

12.01 S&L engages in four general types of activities requiring calibration and control of measuring equipment: (1) inspection (as described in Chapter 10.00 of the program) or test (as described in Chapter 11 of the program) activities in-house, at plant and construction sites, fabricators' facilities (2) verification (via surveillance) by S&L that inspection or tests or other activities conducted by non-S&L organizations have been performed with acceptably calibrated measuring or test equipment (see Chapter 07.00), (3) acquisition of engineering design data at plant and construction sites by means such as certain walkdowns, and (4) in-house review of radiographic film or images. On client request S&L also develops calibration procedures for use by non-S&L organizations, or reviews calibration procedures submitted by clients/suppliers.

For procurement of commercial-grade calibration services for safety-related applications, laboratory accreditation programs administered by the National Institute of Standards and Technology and by the American Association for Laboratory Accreditation, as recognized through the Mutual Recognition Arrangement (MRA) of the International Laboratory Accreditation Program (ILAC), are acceptable in lieu of a supplier audit, commercial-grade survey, or in-process surveillance provided that all of the following conditions are met:

1. A documented review of the laboratory's accreditation is performed and includes a verification of the following:
 - a. The calibration or test laboratory holds accreditation by an Accrediting Body (AB) recognized by the ILAC MRA. The accreditation encompasses ISO/IEC-17025:2017, "General Requirements for the Competence of Testing and Calibration Laboratories."

- b. For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties.
 - c. For procurement of testing services, the published scope of accreditation for the test laboratory covers the needed testing services including test methodology and tolerances/uncertainty.
 - d. The laboratory has achieved accreditation based on an on-site accreditation assessment by the selected AB within the past 48 months. The laboratory's accreditation cannot be based on two consecutive remote accreditation assessments.
2. The purchase documents require that:
- a. The service must be provided in accordance with their accredited ISO/IEC-17025:2017 program and scope of accreditation.
 - b. As-found calibration data must be reported in the certificate of calibration when calibrated items are found to be out-of-tolerance (for calibration services only).
 - c. The equipment/standards used to perform the calibration must be identified in the certificate of calibration (for calibration services only).
 - d. Subcontracting of these accredited services is prohibited.
 - e. S&L shall be notified of any condition that adversely impacts the laboratory's ability to maintain the scope of accreditation.
 - f. Performance of the services listed on this order is contingent on the laboratory's accreditation having been achieved through an on-site accreditation assessment by the AB within the past 48 months.

