



August 15, 2021
GEN/QA-5075

Patricia Silva, Chief
Inspections and Operations Branch
Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards

Reference: NRC Letter (Patricia Silva) to General Atomics, "Part 71 Quality Assurance Program Approval Biennial Change Report," dated December 22, 2017

Dear Ms. Silva,

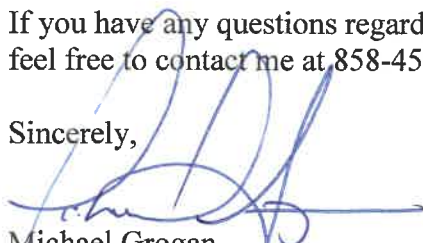
In response to your letter (Ref.) and pursuant to 10 CFR 71.106, General Atomics (GA) Quality Assurance Program submits its second biennial report listing the changes made to the General Atomics Nuclear Quality Assurance (QA) program between 16 August 2017 and 16 August 2020 (Please see the enclosure).

None of the changes to GA's Nuclear QA program during the stated time period reduce commitments to the NRC. Of the four changes made to GA's QA nuclear program in 2018, one is an enhancement that strengthens commitments to tracking nonconformances, two are administrative in nature with the authority to approve QA procedures having been delegated to the Manager of Nuclear Quality, and one is a clarification of a responsibility of Level III NDE personnel.

The enclosed report is in the format of a table listing each of the changes made to GA's QA Program. The information in the table includes the procedure numbers, the revision numbers, effective dates, procedure titles, the changed sections, the changes made, the reason(s) for the changes, and the basis for concluding that the changes do not reduce the commitments to the NRC.

If you have any questions regarding this report of the changes to GA's nuclear program, please feel free to contact me at 858-455-2809, michael.grogan@ga.com, or the mailing address below.

Sincerely,



Michael Grogan
Director, Licensing, Safety, and Nuclear Compliance

Enclosure: Table as described in the text of the letter

cc: K. Partain (GA)
P. Pater (GA)
K. Wall (GA)

Summary of Changes to the October 31, 2018 GA Quality Assurance Manual

QP No.	Rev. No.	Effective Date	Title	Previous	Changed Section	Change	Reason for Change	Basis for Concluding that the Revised Program Incorporating the Change Continues to Satisfy the Applicable Requirements of Subpart H of 10CFR71
QP 5	C	10/31/2018	Instructions, Procedures, and Drawings	4.2.2 QPs contained in the QAM require approval signature of the Director, Quality Assurance, and the Senior Vice President, EMS.	4.2 QA Manual, 4.2.2	QPs contained in the QAM require the approval signature of the Manager of Nuclear Quality Assurance.	In late 2018 the GA Corporate Director of Quality Assurance delegated the authority to the Manager of Nuclear Quality Assurance to approve all nuclear quality procedures (QPs) in the Quality Assurance Manual	This delegation of authority to manage the approval of quality procedures in the quality assurance manual is permitted under section 73.101, Quality Assurance Organization. Thos change does not reduce commitments to the
QP 5	C	10/31/2018	Instructions, Procedures, and Drawings	4.4 The QA organization shall use Quality Division Instructions (QDI) to implement or supplement QAM requirements applicable to QA activities. The individual QDIs are prepared using QDI 6-2 as a guideline, and are approved by the Quality Systems Manager and the QA Director.	4.4 Quality Division Instructions	4.4 The QA organization shall use Quality Division Instructions (QDI) to implement or supplement QAM requirements applicable to QA personnel or QA activities. The individual QDIs are prepared using QDI 6-2 as a guideline, and are approved by the Manager of Nuclear Quality Assurance.	In late 2018 the GA Corporate Director of Quality Assurance delegated the authority to the Manager of Nuclear Quality Assurance to approve all nuclear quality division instructions procedures (QDI) in the QDI Manual	This delegation of authority to manage the approval of quality procedures in the quality assurance manual is permitted under section 73.101, Quality Assurance Organization. Thos change does not reduce commitments to the
QP 5	C	10/31/2018	Instructions, Procedures, and Drawings	4.4 Nondestructive examination (NDE) QDIs are contained in the NDE Operations Book.	4.4 Quality Division Instructions	Nondestructive examination (NDE) QDIs are contained in the NDE Operations Book. NDE QDI procedures are approved at the division level by a Level III NDE person and the Director, Quality Assurance.	Added the last sentence to clarify the signature approval protocol for the NDE QDI procedures.	This is a clarification of a responsibility of Level III NDE personnel of documented procedures, per Section 71.111
QP 15	C	10/31/2018	Nonconformance Report Preparation	Not part of Rev. B of the procedure	4.3.13 Disposition, Control	The Nonconformance Log is to be reviewed on a monthly basis and that review documented in the table titled "Nonconformance Report Review" in the electronic copy of the master NR Log file. The review date and the reviewer's name shall be entered in the table. Save the NR Log and make a pdf of the updated workbook. Post the pdf file of the NR Log on the NTM portion of the "O" drive for access by project personnel. Remove previous versions of the pdf file when an updated version is posted.	The purpose for the monthly review of the Nonconformance Log is to keep attention focused on tracking the nonconformances and getting them closed. The purpose for posting the NR log on the Nuclear Technologies (NTM) portion of the networks drive is to keep the NTM division members aware of the nonconformances and their status.	Per Section 71.131, this change improves documentation of NRs and notification of nonconformances to NTM staff members to remind them they need to address the problems described in the nonconformance reports.