

Enclosure 1

Kairos Power Response to NRC Question 12.9-2

(Non-Proprietary)



Question Number: 12.9-2

More information is needed about sections in the ANSI 15.8 QA standard that were omitted in the Hermes QA program description.

Kairos Power Response:

Section 12.9, Appendix B omitted Section 3.7, "Control Area"; Section 3.8, "Ancillary Duties"; and Section 3.9, "Emergency Communications" of ANSI-ANS-15.8-1995 (R2005), "Quality Assurance Program Requirements for Research Reactors" because these provisions are duplicative of other operational documents (i.e., conduct of operations) and are not consistent with fundamental attributes of QAP criteria (e.g., they are not associated with safety-related SSCs or related activities, do not produce records, and do not lend themselves to QA oversight). The detail of these subjects discussed in these sections of the standard will be addressed in the Final Safety Analysis Report as part of the conduct of operations in Chapter 12.

Section 4 "Applicability to Existing Facilities" and Section 5 "Decommissioning" of ANSI-ANS-15.8-1995 (R2005) were not addressed because these portions are not applicable to the Hermes reactor or to the Preliminary Safety Analysis Report. Kairos Power has no existing facilities for which Section 4 would be applicable. And a decommissioning report for the facility will be provided with the application for the Operating License consistent with 10 CFR 50.33(k) and address the content requirements in 10 CFR 50.75(d)(2).

Impact on Licensing Document:

This response has no impact on the content of the Hermes Non-Power Reactor Preliminary Safety Analysis Report.

References:

none