

From: Allen Fetter
Sent: Thursday, June 8, 2023 10:25 AM
To: Schiele, Raymond Joseph
Cc: ClinchRiver-CPSafRAIsPEM Resource; Deanna Zhang; Kerri Kavanagh; Montague, Kelvin Jevon
Subject: FW: Additional clarification questions for TVA's draft responses to Staff's clarification questions and draft Revision 2 of the QAPD
Attachments: Additional Clarification Questions for Revision 2 of TVA New Nuclear QAPD.docx

Ray,

Please see the attached and Deanna Zhang's email below regarding Rev 2 of the QAPD Topical Report.

Allen H. Fetter, Senior Project Manager
U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Division of New and Renewed Licenses
New Reactor Licensing and Infrastructure Branch
Washington, D.C.

301-415-8556 (Office)
301-385-5342 (Mobile)

From: Deanna Zhang <Deanna.Zhang@nrc.gov>
Sent: Thursday, June 8, 2023 10:19 AM
To: Allen Fetter <Allen.Fetter@nrc.gov>
Cc: Kerri Kavanagh <Kerri.Kavanagh@nrc.gov>
Subject: Additional clarification questions for TVA's draft responses to Staff's clarification questions and draft Revision 2 of the QAPD

Allen,

Please see the attached two additional clarification questions for TVA's draft responses to Staff's clarification questions and draft Revision 2 of the QAPD.

Sincerely,

Deanna Zhang
Senior Reactor Operations Engineer
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
OWFN-4H12
(w) 301.415.1946

Hearing Identifier: ClinchRiver_CPSafRAIs_Public
Email Number: 4

Mail Envelope Properties (MW4PR09MB9396187FBBE49870CD91CDCC8550A)

Subject: FW Additional clarification questions for TVA's draft responses to Staff's clarification questions and draft Revision 2 of the QAPD
Sent Date: 6/8/2023 10:25:01 AM
Received Date: 6/8/2023 10:25:05 AM
From: Allen Fetter

Created By: Allen.Fetter@nrc.gov

Recipients:

"ClinchRiver-CPSafRAIsPEm Resource" <ClinchRiver-CPSafRAIsPEm.Resource@nrc.gov>
Tracking Status: None
"Deanna Zhang" <Deanna.Zhang@nrc.gov>
Tracking Status: None
"Kerri Kavanagh" <Kerri.Kavanagh@nrc.gov>
Tracking Status: None
"Montague, Kelvin Jevon" <kjmontague@tva.gov>
Tracking Status: None
"Schiele, Raymond Joseph" <rjschiele@tva.gov>
Tracking Status: None

Post Office: MW4PR09MB9396.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	1096	6/8/2023 10:25:05 AM
Additional Clarification Questions for Revision 2 of TVA New Nuclear QAPD.docx		
18719		

Options

Priority: Normal
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:

Additional Clarification Questions for Revision 2 of TVA New Nuclear QAPD

1. The draft RAI clarification response for Question 2 provides a table comparing the responsibilities of the New Near Program Fleet QAPD, General Manager, QA and the New Nuclear Projects New Nuclear QAPD General Manager, New Nuclear Projects QA. Row two of this table states, "New Nuclear Program group reports to the CNO and is responsible for governance, oversight, and support of TVA's new nuclear projects."

Can TVA please confirm that the New Nuclear Program group will be responsible for governance, oversight and support of TVA's new nuclear "projects"?

2. Part II, Section 18.2 of the TVA New Nuclear QAPD states "Internal audits of activities conducted after placing the facility in operation, should be performed in such a manner as to assure that an audit of all applicable QA program elements is completed for each functional area within a period of two years. Internal audit frequencies of well-established activities, conducted after placing the facility in operation, may be extend one year at a time beyond the above 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."

Part II, Section 18.3 describes TVA New Nuclear commitment to compliance with NQA-1-2015, Requirement 18 and the applicable regulatory positions stated in RG 1.28 with an exception for allowing extension of the internal audit interval for up to 25 percent of the audit interval.

RG 1.28, Revision 5, Section C, Item 4.a provides an exception to NQA-1-2018, Requirement 18. Specifically, for internal audits, this Item 4.a states that "Applicable elements of an organization's QA program should be audited at least once each year or at least once during the life of the activity, whichever is shorter."

Given that the TVA New Nuclear QAPD, Part II Section 18.3 is committing to RG 1.28, Revision 5, with no exceptions to the internal audit interval beyond the ability to have a 25% extension to the specified internal audit interval, can TVA address the discrepancy of what is stated in Part II, Section 18.2 regarding the internal audit interval of two years and the one year internal audit interval specified in RG 1.28, Revision 5?