

SNC Vogtle 3&4 Pre-Submittal Meeting

Transition of the Vogtle 3&4 Quality Assurance Program (QAP) from the Nuclear Development Quality Assurance Manual (NDQAM) to the SNC Fleet Quality Assurance Topical Report (QATR)

January 8, 2024



Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

- The purpose is to discuss the transition of the Vogtle 3&4 Quality Assurance Program from the Nuclear Development Quality Assurance Manual (NDQAM) to the fleet Quality Assurance Topical Report (QATR).

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

- This meeting will cover the following topics for each license amendment request:
 - Reason for Proposed Change
 - Overview License Amendment Request
 - Precedent (if applicable)

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

• Reason for Proposed Change

- Aligns all SNC plants to a common Quality Assurance Plan Description
- SNC operating plants (except V34) use a common Quality Assurance Plan Description - [Quality Assurance Topical Report (QATR)]
- V34 has separate Quality Assurance Plan Description – Nuclear Development Quality Assurance Manual (NDQAM)
- Integrates V34 quality plan commitments from NDQAM with QATR
- Updates Fleet QA plan description (QATR) to incorporate improvements in formatting and content.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part I Changes

Change	Discussion
Added reference to 10 CFR 52 and NUREG 0800 Section 17.5, Revision 0, as appropriate.	V34 Commitment Additions
Added NDQAM statement, “SNC may delegate to others, such as contractors, agents, or consultants, the work of establishing and executing the quality assurance program, or any part thereof, but shall retain responsibility for the quality assurance program.”	<u>Potential increase in Commitment (F, H, V1&2)</u> V34 Commitment Addition
Replaced ‘Definitions of terms used in this QATR and not contained in NQA-1-1994 list of definitions are shown in Appendix D to the QATR.’ with ‘The definitions provided in NQA-1-1994, Part I, Introduction, Section 4 or ANS-3.2/ANSI N18.7-1976 apply to select terms as used in this document.’	QATR Improvement Item. Definitions are contained in referenced standards/regulatory document. This is coupled with the deletion of Appendix D “Definitions.”

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Organization)

Change	Discussion
Replaced NDQAM statement “Specific titles identifying individuals responsible for implementation of QA program elements are provided in the conduct of operations procedures for the applicable departments. ” with existing QATR statement ‘Specific titles identifying individuals responsible for implementation of QA program elements are provided in the conduct of operations described in Chapter 13 of the applicable site FSAR. ’	Vogtle 3&4 impact only. Adopted QATR description for the fleet regarding the location titles responsible for implementation of QA program elements. No impact to any plant conduct of operations procedures.
Revised subsection to state that construction is complete all sites and added clarification language from the NDQAM regarding major rework and modifications during the Operation Phase	QATR Improvement Item.
Added the NDQAM subsection general description language the operational structure during the operational phase	QATR Improvement Item.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Organization cont..)

Change	Discussion
Reduced levels of management listed this subsection. Fleet: President and CEO, Chief Nuclear Officer/EVP, Sr. Vice President – Operations, Vice President – Operations Support, Vice President – Engineering, Vice President – Regulatory Affairs, Vice President Human Resources and Senior manager responsible for supply chain. Site: Vice President – Site and Plant manager remain.	QATR Improvement Item. Changes are made to the organization section of the QATR to limit the extent and detail of organization position description consistent with current industry practice. (ex. Palo Verde SER) The descriptions of these positions list the direct reports performing a quality function.
Removed levels of management listed this subsection to positions that do not perform quality-related activities as described in NQA-1-1994 or the organization structure above the position was sufficient to describe the QA function.	QATR Improvement Item. The current NDQAM description is used.
Added the NDQAM general description of “Independent Oversight” to this subsection	QATR Improvement Item. The current NDQAM description is used.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Quality Assurance Program)

Change	Discussion
<p>Added a new subsection titled “Independent Review” which aligns with the level of detail of the NDQAM and Option 1 of NEI 06-14A. As a result, the QATR Appendix A “Plant Review Board” (PRB) and Appendix B “Independent Review” is deleted.</p> <p>The Plant Review Board (PRB) is designated as the “Independent Review Body” as stated in Option 1 of NEI 06-14A.</p>	<p>The new Independent Review subsection implements the QAP as described in Option 1 of NEI 06-14A but incorporating the knowledge and experience from QATR.</p>
<p>With regards to the PRB meeting schedule, the new section states, “Activities occurring during the operational phase shall be independently reviewed on a periodic basis.”</p>	<p><u>Potential Reduction in Commitment (F, H and V 1&2)</u> The QATR currently states, “The PRB shall meet at least once per calendar month, or more frequently if convened by the PRB Chairperson.” The periodicity will be controlled by implementing procedures.</p>
<p>With regards to oversight of PRB activities, the new section states, “The results of IRB reviews of matters involving the safe operation of the facility are periodically independently reviewed.”</p>	<p><u>Potential Reduction in Commitment (F, H and V 1&2)</u> The QATR currently states, “SNC periodically performs independent reviews of matters involving the safe operation of its fleet of nuclear power plants, with a minimum of one such review being conducted for each generating site each year. The performance of the Plant Review Board is included in this review.” The periodicity will be controlled by implementing procedures.</p>

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial

QATR Part II Changes (Quality Assurance Program cont..)

Change	Discussion
The NDQAM statement, “ Reviews the adequacy of the audit program every 24 months ” will not be transferred to the QATR.	<u>Potential Reduction in Commitment (V 3&4)</u> Farley, Hatch and Vogtle 1&2 use the Nuclear Industry Evaluation Program (NIEP) to audit the QA programs for each utility every 36 months. Vogtle 3&4 will be subject to this process when integrated into the fleet QATR.
The minimum required education and experience of the PRB (i.e., Independent Review Committee) Chair and Members as stated in the NDQAM will not be transferred to the QATR.	The plant and support staff, in which PRB membership are drawn from, qualification requirements are as delineated in each site’s Technical Specifications.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Design Control)

Change	Discussion
Added subsections for Computer Application and Digital Equipment Software (Vogtle 3&4 Only) and Setpoint Control (Vogtle 3&4 Only)	V34 Commitment Additions
Added Vogtle 3&4 specific commitment to NQA-1-1994	V34 Commitment Addition

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Procurement Document Control)

Change	Discussion
10 CFR 50.55(e) references removed from this section.	10 CFR 50.55(e) is related to construction activities; thus, it is historical.
The NDQAM statement, “ 10 CFR 21 requirements for posting, evaluating and reporting will be followed and imposed on suppliers when applicable. ” will not be transferred to the QATR.	Duplicate information. The QATR contains the following statement, “ Applicable technical, regulatory, administrative, quality and reporting requirements (such as specifications, codes, standards, tests, inspections, special processes, and 10 CFR 21) are invoked for procurement of items and services. ”
Added NDQAM language regarding contracts bids or awards reviews.	QATR Improvement Item. The statements capture various requirements found in Basic Requirement 4 and Basic Requirement 8 of NQA-1 which are currently applicable to the Fleet.
Relocated International Laboratory Accreditation Cooperation (ILAC) commitment items to Part II, Section 7 NQA-1-1994 Commitments	QATR Improvement item

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial

QATR Part II Changes (Instructions, Procedures, and Drawings)

Change	Discussion
Removed this statement from the “Temporary Procedure Control” subsection, “and, if required, reviewed by the Plant Review Board and approved by the appropriate plant management within 14 days of implementation.”	The scope of PRB reviews is detailed new subsection titled “Independent Review.” Review of temporary procedures is not mentioned in scope but require PRB for review if a 50.59 Evaluation is required by implementing procedures.
Incorporated NDQAM language on “Procedure Content.”	QATR Improvement Item.
Remove the following statement, “Appendix E of this QATR provides additional details regarding procedures developed and implemented by SNC.”	Appendix E provides redundant information. The information in Appendix E was provided as equivalent requirements for meeting the regulatory positions of Reg. Guide 1.33, Rev. 2. SNC commitment to Reg. Guide 1.33, Rev. 2 is described in QATR Part III, Regulatory Commitments.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Document Control)

Change	Discussion
The NDQAM Subsection 1.2, “Types of Documents to be controlled” will not be transferred to the QATR.	The NDQAM language was derived from bracketed and italicized information in NEI 06-14A as examples of the documents to be controlled and is not all inclusive. The QATR does not list the types of documents to be controlled to this level of detail.
The NDQAM Subsection 2.0, “Review and Approval of Documents” will not be transferred to the QATR.	<u>Potential Reduction in Commitment (V 3&4)</u> Level of detail not in the QATR. Activity controlled at the procedure level.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Identification And Control Of Materials, Parts, and Components)

Change	Discussion
Added clarification language NDQAM statement, “This includes controls for consumable materials and items with limited shelf life to preclude the use of items whose shelf life has expired. ”	QATR Improvement Item.
Added commitment, “ There are specific personnel qualification and certification requirements for personnel performing safety-related non-destructive evaluation (NDE) activities for the nuclear industry that are not addressed by the ILAC accreditation process. Therefore, the ILAC accreditation process cannot be used as part of the commercial-grade dedication process of NDE services in lieu of performing procurement source evaluation and selection. ”	<u>Increase in commitment (F, H, V1&2)</u>

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Control of Special Processes)

Change	Discussion
Only editorial changes.	

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Inspection)

Change	Discussion
The NDQAM Subsection 2.0, "Inspection Program" will not be transferred to the QATR.	Potential Reduction in Commitment (V 3&4) Level of detail not in the QATR. Activity controlled at the procedure level.
Added NDQAM statement regarding "Inspector Qualification," "SNC has established qualification programs for personnel performing quality inspections. The qualification program requirements are described in Part II, Section 2. These qualification programs are applied to individuals performing quality inspections regardless of the functional group where they are assigned."	QATR Improvement Item.
Added NDQAM statement regarding "NQA-1-1994 Commitment" for Vogtle 3&4 only, "For structures with design based on American Concrete Institute ACI-349, the testing and inspection requirements of ACI-349, as identified and supplemented in Updated Final Safety Analysis Report Section 3.8, may be applied in lieu of NQA-1-1994 Subpart 2.5, paragraph 7.13."	V34 Commitment Addition

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Test Control)

Change	Discussion
<p>Added NDQAM statement, “Tests are performed and results documented in accordance with applicable technical and regulatory requirements including those described in the Technical Specifications and UFSAR. Test programs ensure appropriate retention of test data in accordance with the records requirements of this QATR. Personnel that perform or evaluate tests are qualified in accordance with the requirements established in Part II, Section 2.”</p>	<p>QATR Improvement Item.</p>

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial

QATR Part II Changes (Control Of Measuring and Test Equipment)

Change	Discussion
Added NDQAM statement, “The suppliers of commercial-grade calibration services shall be controlled as described in Part II, Section 7.”	QATR Improvement Item.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Handling, Storage, and Shipping)

Change	Discussion
Added NDQAM statement, “ The suppliers of commercial-grade calibration services shall be controlled as described in Part II, Section 7. ”	QATR Improvement Item.
The NDQAM statements regarding the special handling devices will not be transferred to the QATR.	<u>Potential Reduction in Commitment (V 3&4)</u> Special handling devices are described in the UFSAR/FSAR for each site with regards to compliance to NUREG-0612, “Control of Heavy Loads at Nuclear Power Plants.”

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial

QATR Part II Changes (Inspection, Test, and Operating Status)

Change	Discussion
Added NDQAM statement, “Administrative procedures also describe the measures taken to control altering the sequence of required tests, inspections, and other operations. Review and approval for these actions is subject to the same control as taken during the original review and approval of tests, inspections, and other operations.”	QATR Improvement Item.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Nonconforming Materials, Parts, or Components cont.)

Change	Discussion
<p>Added NDQAM statement, “Administrative procedures also describe the measures taken to control altering the sequence of required tests, inspections, and other operations. Review and approval for these actions is subject to the same control as taken during the original review and approval of tests, inspections, and other operations.”</p>	<p>QATR Improvement Item.</p>
<p>The QATR statement, “Conditional release of nonconforming items for installation requires the approval of the vice president - site or his designee.” to “Conditional release of nonconforming items for installation requires the approval of the designated management.”</p>	<p><u>Potential Reduction in Commitment (F, H, V 1&2)</u></p>
<p>The NDQAM statement, “Nonconformance dispositions are reviewed for adequacy, analysis of quality trends, and reports provided to the designated management.” will not be transferred to the QATR.</p>	<p><u>Potential Reduction in Commitment (V 3&4)</u> Analysis of trends of nonconformances is described in NUREG-0800-17.1, but it is not in NUREG-0800-17.5 and this change is consistent with ANSI N18.7. NQA-1-1994 does not describe trending of dispositions of nonconformances. Appendix 16A-1, Nonmandatory Guidance on Corrective Action, Section 3.1 states, ‘Conditions adverse to quality should be reviewed to determine the existence of trends.’ This is consistent with QATR Part II, Section 16 which requires trending of conditions adverse to quality and analysis of the trends.</p>

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial

QATR Part II Changes (Nonconforming Materials, Parts, or Components cont..)

Change	Discussion
The NDQAM Subsection 2.0, "Reporting Program" will not be transferred to the QATR.	<u>Potential Reduction in Commitment (V 3&4)</u> This describes administrative controls that are controlled by the Corrective Action Program, the Part 21 Reporting Program and detailed in existing fleet and site procedures.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Corrective Action)

Change	Discussion
<p>The following NDQAM statements will not be transferred to the QATR:</p> <ul style="list-style-type: none"> • “SNC procedures require personnel to identify known conditions adverse to quality.” • “In the case of a significant condition adverse to quality, the cause is determined and actions to preclude recurrence are taken.” 	<p><u>Potential Reduction in Commitment (V 3&4)</u> Level of detail not in the QATR. Activity controlled at the procedure level.</p>
<p>The following NDQAM statements will not be transferred to the QATR: “In the case of suppliers working on safety-related activities, or other similar situations, SNC may delegate specific responsibilities for corrective actions but SNC maintains responsibility for the effectiveness of corrective action measures.”</p>	<p>Duplicate information. Section 4 “Procurement Document Control” NQA 1 1994 Commitment, states “In lieu of this requirement, SNC may require suppliers to have a documented supplier quality assurance program that is determined to meet the applicable requirements of 10 CFR 50, Appendix B, as appropriate to the circumstances of the procurement” which will include a corrective action program.</p>
<p>The NDQAM Subsection 2.0, “Interface with the Reporting Program” will not be transferred to the QATR.</p>	<p><u>Potential Reduction in Commitment (V 3&4)</u> This describes administrative controls that are controlled by the Corrective Action Program, the Part 21 Reporting Program and detailed in existing fleet and site procedures.</p>

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Quality Assurance Records)

Change	Discussion
Added NDQAM statement, “Measures are established that ensure that sufficient records of completed items and activities affecting quality are appropriately stored.”	QATR Improvement Item.

Under Consideration: Upgrading to the latest Nuclear Information and Records Management Association (NIRMA) standards.
[Ref. R.G. 1.28, “Quality Assurance Program Criteria (Design and Construction)” Rev. 6]

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial QATR Part II Changes (Audits)

Change	Discussion
Adopted the QATR Section “Performance of Audit” to align Vogtle 3&4 audit intervals with the Fleet	NDQAM Part II, Section 18, 3.0 Internal Audits, Paragraph 3.2 states, ‘Audits of Fleet organizations established prior to new construction will be conducted at the frequency indicated in the SNC QATR.’ Additionally, NEI 06-14A provides for extending frequencies of audits that is consistent with the SNC method.

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Non-Editorial Changes Part III (Regulatory Commitments)

Change	Discussion
Add Vogtle 3&4 specific commitment to Regulatory Guide 1.8	V34 Commitment Addition
Add Vogtle 3&4 specific commitment to Regulatory Guide 1.26, revision 4	V34 Commitment Addition
Remove Vogtle 3&4 commitment to Regulatory Guide 1.33, Revision 2 to be consistent with SNC Fleet QATR	<u>Potential Reduction in Commitment (V 3&4)</u>

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

Additional Non-Editorial Changes

Change	Discussion
Appendix A “Plant Review Board” Deleted	Relocated to new QATR “Independent Review” Section (Adopted NDQAM Language)
Appendix B “Independent Review” Deleted	Relocated to new QATR “Independent Review” Section (Adopted NDQAM Language)
Appendix C “Quality Assurance Surveillances” Deleted	As stated in ASME NQA-1-1994, Part I, Section 4, Terms and Definitions, “an audit should not be confused with surveillance or inspection activities performed for the sole purpose of process control or product acceptance.” SNC procedure NOS-106, Nuclear Oversight Surveillances, version 7.0, would be incorporated by reference.
Appendix D “Definitions” Deleted	Duplication. Definitions are provided in NQA-1-1994, Part I, Introduction, Section 4 or ANS-3.2/ANSI N18.7-1976.
Appendix E “Procedures” Deleted	This appendix provides redundant information. The information in Appendix E was provided as equivalent requirements for meeting the regulatory positions of Reg. Guide 1.33, Rev. 2. SNC commitment to Reg. Guide 1.33, Rev. 2 is described in QATR Part III, Regulatory Commitments.
Created new Part V “Nonsafety-Related SSC Quality Control (Vogtle 3&4 Only)” [NDQAM Part III]	V34 Commitment Addition

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

- Precedent

Schedule

Transition the Vogtle 3&4 QAP from the NDQAM to the SNC Fleet QATR

• Schedule

- Submit LAR – 3rd Quarter 2024.
- Request Approval – 1 year from acceptance.

Questions?



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