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10 CFR 50.54(a)(4)

U. S. Nuclear Regulatory Commission
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	72-036	72-042	72-1039	

Edwin I. Hatch Nuclear Plant, Units 1 and 2
Joseph M. Farley Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 3 and 4

Revise the Southern Nuclear Quality Assurance Plans to Integrate
Vogtle Units 3 and 4 and Make Other Enhancements – Reduction in Commitment

Ladies and Gentlemen:

In accordance with the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(a)(4), Southern Nuclear Operating Company (SNC) hereby requests approval of a revision to the Quality Assurance Topical Report (QATR). The proposed revision, which contains reductions in commitment from the current Quality Assurance Program (QAP) descriptions, must be submitted to the Nuclear Regulatory Commission (NRC) for approval prior to implementation. Specifically, SNC's QATR will be revised to accommodate integrating the QAP for Vogtle Electric Generating Plant, Units 3 and 4, and to make other enhancements.

The enclosure provides information pursuant to 10 CFR 50.54(a)(4) and includes a summary of the proposed change, justification of the proposed change, and a basis for concluding that the revised QATR will continue to satisfy the criteria of 10 CFR 50 Appendix B. Attachment 1 provides tabulated information for each reduction in commitment. Attachment 2 provides a mark-up of the affected pages for the reduction in commitments from Version 27 of the QATR. Attachment 3 provides clean-typed pages of the proposed QATR, in its entirety. Please note that by letter dated March 24, 2025 (ADAMS Accession No. ML25083A242) SNC provided Version 27.0 of QATR and 25.2 of the Nuclear Development Quality Assurance Manual. These remain the current versions of the respective documents as of the date of this request. The proposed QATR and reduction in commitments do not impact the SNC licensing action to adopt

Regulatory Guide 1.8 Revision 4, which was submitted on January 23, 2025 (ADAMS Accession No. ML25023A218).

Approval of the reductions in commitment are requested within one year of completion of the NRC's acceptance review. This letter contains no regulatory commitments, nor does it contain security-related information. The SNC QATR will be revised within 180 days of NRC approval.

If you have any questions, please contact Mr. Ryan Joyce at (205) 992-6468.

Respectfully submitted,

Jamie Coleman

Jamie M. Coleman
Regulatory Affairs Director

Enclosure: Description and Basis for Change

Attachments: Attachment 1 – Reduction in Commitment Table
Attachment 2 – Marked-up QATR Pages for Reductions in Commitment
Attachment 3 – Proposed Clean Typed QATR

cc: NRC Regional Administrator, Region II
NRR Project Manager – Farley, Hatch, Vogtle 1&2, Vogtle 3&4
Senior Resident Inspector – Farley, Hatch, Vogtle 1&2, Vogtle 3&4
Document Services RTYPE:CGA02.001

ENCLOSURE to NL-25-0067

Edwin I. Hatch Nuclear Plant, Units 1 and 2
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Revise the Southern Nuclear Quality Assurance Plans to Integrate Vogtle Units 3 and 4 and Make Other Enhancements – Reduction in Commitment

Description and Basis for Change

1. Description of the Change

The Southern Nuclear Operating Company (SNC) Quality Assurance Program (QAP) is described in the Quality Assurance Topical Report (QATR) and in the Nuclear Development Quality Assurance Program (NDQAM). The current QATR is applicable to the Joseph M. Farley Nuclear Plant (Farley), Edwin I. Hatch Nuclear Plant (Hatch), and Alvin W. Vogtle Electric Generating Plant, Units 1 and 2 (VEGP 1&2). The SNC NDQAM describes the QAP for Vogtle Electric Generating Plant, Units 3 and 4 (VEGP 3&4). SNC submitted the current versions of the QATR and the NDQAM by letter dated March 24, 2025 (ADAMS Accession No. ML25083A242).

The primary purpose of the proposed change is to transition the VEGP 3&4 QAP from the NDQAM to the SNC fleet QATR. This will be accomplished by implementing a revised version of the QATR that describes the QAP for all SNC sites to include VEGP 3&4. Upon issuance of the revised QATR, the NDQAM will be inactivated. The proposed change also includes enhancements that are consistent with industry standards and regulatory guidance. An evaluation concluded that implementation of the proposed QATR would constitute a reduction in commitment per 10 CFR 50.54(a)(4). Therefore, NRC approval is required prior to implementation.

Attachment 1 of this enclosure tabulates information related to each reduction in commitment (RIC) and includes the current QAP requirement, a summary of the proposed change and a justification for complying with 10 CFR 50, Appendix B. For each RIC, Attachment 2 provides mark-ups of the affected pages of the QATR reduction in commitments and includes references to the associated information in Attachment 1. Attachment 3 provides a clean-typed copy of the proposed QATR. Additional information can be made available for NRC audit, if necessary.

2. Reason for the Proposed Change

The primary purpose of the proposed change is to transition the VEGP 3&4 QAP from the NDQAM to the QATR. This will align all SNC plants to a common QAP description, which is consistent with SNC's fleet management model of using common processes and procedures across the fleet that are consistent with industry-best practices and that comply with regulatory requirements. Transitioning VEGP 3&4 to the QATR will reduce the burden of maintaining two QAP descriptions within the fleet. Additional enhancements are proposed that aim to improve flexibility and reduce redundancy.

3. Basis for Concluding that the Revised Program Continues to Satisfy the Criteria of 10 CFR 50 Appendix B and the Previously Accepted Quality Assurance Program

The SNC QAP will continue to satisfy the criteria of 10 CFR 50 Appendix B and the QAP description commitments previously accepted by the NRC. The justification for each reduction in commitment is provided in Attachment 1 of this enclosure.

The SNC QATR makes no commitment to the guidance of ANSI N18.7-1976/American Nuclear Society (ANS) 3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants" (Reference 1), as endorsed by Regulatory Guide (RG) 1.33, Revision 2 (Reference 2). SNC considers the collective requirements of the QATR and NQA-1-1994

(Reference 3) to be equivalent to N18.7-1976. Much of the guidance provided by N18.7-1976 is similar to the guidance of NQA-1-1994; the additional guidance provided by N18.7-1976 is incorporated directly in the QATR. The NRC staff previously determined that the QA program commitments for each of the SNC plants had been acceptably retained by the common QATR. The staff further determined that the QATR, as supplemented by the guidance of NQA-1-1994, provided an acceptable alternative to an explicit commitment to N18.7-1976 and RG 1.33, Revision 2 (Reference 4).

NEI 06-14A, Quality Assurance Program Description, Revision 7 (Reference 5), provides a generic template for use by early site permit and combined license applicants to implement applicable requirements related to the QAP. The template includes the QA methods and administrative control requirements that meet 10 CFR 50, Appendix B, and 10 CFR Part 52 and is based on the requirements of ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," Parts I, II, and III. When NEI 06-14A was issued, ASME NQA-1-1994 was the latest approved standard for a QAP as referenced in the NRC's Standard Review Plan. The QAP template in NEI 06-14A, Revision 7, was found acceptable by the NRC, as documented in the Final Safety Evaluation, dated November 3, 2009 (Reference 6). Since the NRC found NEI 06-14A to be an acceptable template that satisfies 10 CFR 50, Appendix B and can be used for applicants of a 10 CFR Part 52 combined license, SNC considers that the template can also be used to satisfy 10 CFR 50, Appendix B for Part 50 license holders (i.e., for Hatch, Farley, and Vogtle 1&2). The proposed QATR includes changes to the independent review function, which is based on NEI 06-14A, the current QATR, and N18.7-1976. The implementation of the independent review description is acceptable since the function is for the operational phase and based on NQA-1-1994, the current QATR, and N18.7-1976, all of which have been accepted as satisfying the requirements of 10 CFR 50, Appendix B.

The changes to the QAPs in consolidating commitments in the proposed QATR are: (1) a commitment to NQA-1-1994 as the basis for the QA program; (2) explicit incorporation of N18.7-1976 operational administrative and QA controls in the QATR; (3) consolidation of organizational descriptions; (4) reliance on alternatives and exceptions to NQA-1-1994 that have previously been approved by NRC safety evaluations.

4. Conclusion

The proposed change is compliant with, and continues to satisfy, the criteria of 10 CFR 50 Appendix B and the QAP description commitments previously accepted by the NRC.

5. References

1. ANSI N18.7-1976/ANS-3.2, American National Standard Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants Revision of N18.7-1972, February 19, 1976
2. Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation), Revision 2, February 1978 (ML003739995)
3. Quality Assurance Requirements for Nuclear Facility Applications, ASME NQA-1-1994 Edition, Issued July 29, 1994

4. Joseph M. Farley Nuclear Plant, Units 1 and 2 (FNP), Edwin I. Hatch Nuclear Plant, Unit Nos. 1 and 2 (HNP), Vogtle Electric Generating Plant, Units 1 and 2 (VEGP) - Approval of Southern Nuclear Operating Company, Inc.'s Quality Assurance Topical Report, June 21, 2007 (ML071510506)
5. Nuclear Energy Institute (NEI) 06-14A, Quality Assurance Program Description, Revision 7, August 2010 (ML102370305)
6. Final Safety Evaluation for Technical Report NEI 06-14, "Quality Assurance Program Description," Revision 7, November 3, 2009 (ML092650695)
7. Request for Approval Of Nuclear Management Company Quality Assurance Topical Report, October 31, 2003 (ML033070155)
8. Approval of Nuclear Management Company Quality Assurance Topical Report, March 24, 2005 (ML050700416)

ATTACHMENT 1 to NL-25-0067

Edwin I. Hatch Nuclear Plant, Units 1 and 2
Joseph M. Farley Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 3 and 4

Quality Assurance Program Reduction in Commitment Table

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
1	N/A – no associated QATR section as the positions are removed in the proposed change The detailed responsibilities of fleet senior managers over operations, maintenance, radiation protection, environmental and chemistry, industrial safety, training, engineering, organizational effectiveness, nuclear fuel, central design engineering, plant support engineering, regulatory affairs, regulatory compliance, licensing, environmental, security, and emergency preparedness are removed in the proposed change. The functional areas associated with these positions remain listed in the proposed QATR based on how the positions report. The functional areas are listed as reporting to one of the following positions: • Senior manager of governance and oversight (1.3.1.1.1.1) • Engineering VP (1.3.1.1.1.2) • Regulatory Affairs VP (1.3.1.1.2.1) For Vogtle 3&4, certain positions from Part II, Section 4.0 of the	Current QATR, Part II, Section 1.2.1 In the current QATR, the following corporate senior manager responsibilities are described: • operations (1.2.1.1.1.2.1) • maintenance (1.2.1.1.1.2.2) • radiation protection (1.2.1.1.1.2.3) • environmental and chemistry (1.2.1.1.1.2.4) • industrial safety (1.2.1.1.1.2.5) • training (1.2.1.1.1.2.6) • engineering (1.2.1.1.1.2.7) • organizational effectiveness (1.2.1.1.1.2.8) • nuclear fuel (1.2.1.1.1.3.1) • central design engineering (1.2.1.1.1.3.2) • plant support engineering (1.2.1.1.1.3.3) • regulatory affairs director (1.2.1.1.2.1.1) • regulatory compliance (1.2.1.1.2.1.1.1) • licensing (1.2.1.1.2.1.1.2) • environmental (1.2.1.1.2.1.1.3) • security (1.2.1.1.2.1.2) • emergency preparedness (1.2.1.1.2.1.3) Current NDQAM, Part II, Section 4.0 In the current NDQAM, the following corporate positions are described:	Item No. 1 and Item No. 2 are RICs for Farley, Hatch, Vogtle 1&2, and Vogtle 3&4. The content and level of detail in the proposed version of the QATR meets or exceeds NQA-1-1994, Basic Requirement 1, Organization, which states, in part: "The organizational structure, functional responsibilities, levels of authority, and lines of communication for activities affecting quality shall be documented. …" The proposed changes associated with RIC No. 1 and RIC No. 2 are to remove detailed responsibilities of certain corporate and site senior manager positions from the QATR. The level of detail in the current QATR is not needed to meet the standard in NQA-1-1994, Basic Requirement 1, Organization. The organization described in the proposed QATR meets the standard in NQA-1-1994 and is therefore compliant with 10 CFR Part 50, Appendix B.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
	NDQAM are not carried forward into the proposed QATR.	• site security director - Vogtle 1-4 (4.1.1) • information technology (5.2)	
2	N/A – no associated QATR section as the positions are removed in the proposed change The detailed responsibilities of site senior managers over maintenance, operations, environmental and chemistry, radiation protection, outages, regulatory affairs, and security are removed in the proposed change. These positions remain in either Subsection 1.3.2.1 as being directed by the site VP or in Subsection 1.3.2.1.1 as being directed by the plant manager. For Vogtle 3&4, certain positions from Part II, Section 3.0 of the NDQAM are not carried forward into the proposed QATR.	Current QATR, Part II, Section 1.2.2 In the current QATR, the following site senior manager responsibilities are described: • maintenance (1.2.2.1.1) • operations (1.2.2.1.2) • environmental and chemistry (1.2.2.1.3) • radiation protection (1.2.2.1.4) • outages (1.2.2.1.5) • regulatory affairs (1.2.2.2) • security (1.2.2.5) Current NDQAM, Part II, Section 3.0 In the current NDQAM, the following site senior manager responsibilities are described: • operations (3.1.1.1) • maintenance (3.1.1.2) • radiation protection (3.1.1.3) • regulatory affairs (3.1.3) • operations engineering (3.1.4.1) • cyber security (3.1.4.2) • digital I&C (3.1.4.3)	

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	Proposed QATR Part/Section Summary of Proposed Change	Current QATR or NDQAM Part/Section Current Requirement	Justification for Change
		• construction engineering resolution team project manager (3.1.4.4)	
3	N/A – no associated QATR section as the content is removed in the proposed change Part II, Section 15, of the proposed QATR addresses nonconforming materials, parts, or components. However, the requirement to review nonconformance dispositions for reporting to the site VP is removed in the proposed change.	Current QATR, Part II, Section 15 The next-to-last sentence in Section 15 states: "Nonconformance dispositions are reviewed for adequacy, analysis of quality trends, and reports provided to the vice president - site."	Item No. 3 and Item No. 4 are RICs for Farley, Hatch, and Vogtle 1&2. Regulatory Guide (RG) 1.33, Revision 2, February 1978, Quality Assurance Program Requirements (Operation), endorsed ANSI N18.7-1976/ANS-3.2, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants, February 19, 1976. ANSI N18.7-1976 does not provide a standard for trending of nonconformance dispositions in Section 5.2.14, Nonconforming Items. Section 5.2.11, Corrective Actions, states, "In the case of significant conditions adverse to safety, the measures shall assure that the cause of the condition is determined, and corrective action taken shall be documented and reported to appropriate levels of management… ." Proposed QATR, Part II, Section 15, remains consistent with ANSI N18.7-1976/ANS-3.2 and NQA-1-1994, Supplement 15S-1, Section 4.4, Disposition, for addressing nonconforming materials, parts, or components. Subsection 15.1.3 of the proposed QATR invokes Section 16 of the QATR, Corrective Action. SNC's Corrective Action Program (CAP) provides the requirements to promptly identify, control, document, classify, correct, and trend conditions adverse to quality. SNC's CAP implementing procedures address management notifications, trending of conditions adverse to quality, and the management review of nonconformance dispositions (performed by the Management Review Committee or MRC).
4	N/A – no associated QATR section as the content is removed in the proposed change Part II, Section 15, of the proposed QATR addresses nonconforming materials, parts, or components. However, the requirement to report significant trends to the site VP is removed in the proposed change.	Current QATR, Part II, Section 15 The last sentence in Section 15 states: "Significant trends are reported to the vice president - site in accordance with SNC procedures, regulatory requirements, and industry standards."	

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
			Furthermore, Part II, Section 3, Design Control, Subsection 3.1.3 of the proposed QATR provides that the disposition of nonconforming items as "use as is" or "repair" are reviewed by the SNC design organization or other authorized organizations. Section 15 of the proposed QATR meets the standards in ANSI N18.7-1976/ANS-3.2 and NQA-1-1994 related to dispositioning nonconformances for materials, parts, or components and is therefore compliant with 10 CFR 50, Appendix B.
5	Part II, Subsection 18.1.1 In the proposed change, the last sentence is revised to state, "In addition to audits, SNC may also provide oversight with surveillances." Appendix C of the current QATR has been removed in the proposed change (see RIC No. 14 for discussion on the removal of Appendix C).	Current QATR, Part II, Section 18 Section 18 states: "SNC has established the necessary measures and governing procedures to implement audits to verify that activities covered by this QATR are performed in conformance with the requirements established. The audit programs are themselves reviewed for effectiveness as a part of the overall audit process. In addition to audits, SNC commits to perform surveillances as described in Appendix C to this QATR."	This is a RIC for Farley, Hatch, and Vogtle 1&2. There is no regulatory requirement to perform QA surveillances as described in Appendix C of the current QATR. SNC proposes to remove Appendix C from the QATR; however, SNC will maintain the option to perform QA surveillances per procedure. The proposed QATR reflects a revision to Subsection 18.1.1 to remove the reference to Appendix C and provide for the optional use of QA surveillances. The QATR maintains a focus on the audit program, which remains compliant with 10 CFR 50, Appendix B. Therefore, the proposed change is acceptable.
6	N/A – no associated QATR section as the meeting quorum requirements are removed in the proposed change The quorum requirements for PRB meetings are removed from the QATR in the proposed change.	Current QATR, Appendix A, Section 3.0 "A quorum of the PRB shall consist of the Chairperson or Vice Chairperson plus two voting members, or one voting member and one designated voting alternate. However, if more than a minimum number of members are present to meet the requirement for a quorum, a maximum of	This is a RIC for Farley, Hatch, and Vogtle 1&2. NEI 06-14A, Quality Assurance Program Description, Revision 7 (ML102370305), provides a generic template for use by early site permit and combined license applicants to implement applicable requirements related to the Quality Assurance Program (QAP). The template includes the QA methods and administrative control

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
	Note that in the proposed change, requirements for the Independent Review function are relocated to Part II, Subsection 2.5 (from Appendix A in the current QATR).	one third of the voting membership may be designated alternates."	requirements that meet 10 CFR 50, Appendix B, and 10 CFR Part 52 and is based on the requirements of ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," Parts I, II, and III. When NEI 06-14A was issued, ASME NQA-1-1994 was the latest approved standard for a QAP as referenced in the NRC's Standard Review Plan (NUREG-0800). The Independent Review section in the proposed QATR (Part II, Section 2, Subsection 2.5) is based on NEI 06-14A, PART V, Additional Quality Assurance and Administrative Controls for the Plant Operational Phase, Subsection 2.2, Independent Review. SNC is proposing to implement Option I in Subsection 2.2 of the template (Independent Review Body). The implementation of this Independent Review description for Farley, Hatch and Vogtle 1&2 is acceptable since the Independent Review function is for the operational phase and based on NQA-1-1994, which has been accepted to satisfy the requirements of 10 CFR 50, Appendix B. The QAP template in NEI 06-14A, Revision 7, was found acceptable by the NRC, as documented in the Final Safety Evaluation, dated November 3, 2009 (ML092650695). Details of the PRB quorum requirements will be procedurally controlled. SNC's proposed QATR Subsection 2.5 related to the performance of the Independent Review is consistent with Option I of NEI 06-14A, PART V, Subsection 2.2, Independent Review, which the NRC found to satisfy 10 CFR 50, Appendix B.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
7	Part II, Subsection 2.5.1 In the proposed change, the QATR requirements to conduct PRB reviews of specific regulatory evaluations are revised to be less prescriptive, but consistent with the standard. The description of the scope of reviews to be conducted by the PRB is provided in Part II, Subsection 2.5.1, which was relocated from Appendix A, Section 4.0, in the current QATR. The PRB will review proposed changes to the facility that are determined to adversely affect nuclear safety or impact Technical Specifications. They'll review changes that require an amendment to the license or Technical Specifications (TSs) and other changes such as those related to tests and experiments not described in the Updated Final Safety Analysis Report (UFSAR). A review of matters related to nuclear safety can also be requested by the site VP or any PRB member (Subsection 2.5.1.5).	Current QATR, Appendix A, Section 4.0 "The PRB shall be responsible for: (a) Review of (1) all procedures and programs required by facility Technical Specifications administrative controls and changes thereto that require a regulatory evaluation under the facility's 10 CFR 50.59 and 10 CFR 72.48 screening program, (2) changes to the quality assurance program description determined to be reductions in the commitment under the provisions of 10 CFR 50.54(a), and (3) any other proposed procedures, programs, or changes thereto affecting facility nuclear safety as determined by the plant manager."	This is a RIC for Farley, Hatch, Vogtle 1&2, and Vogtle 3&4. For Farley, Hatch, and Vogtle 1&2, the proposed change is consistent with NEI 06-14A with clarifications regarding the PRB's review of proposed changes to the facility to conform with the current QATR and existing implementing procedures for the review of 10 CFR 50.59 evaluations. Performing an independent review of 10 CFR 50.59 evaluations is consistent with N18.7-1976, Section 4.3.4. SNC employs a process that guides the screening and evaluation of proposed changes to the facility in accordance with § 50.59 and § 52 Appendix D. Changes that screen in for evaluation (referred to as a "full evaluation") per SNC's procedure will fall under the scope of reviews to be conducted by the PRB. The PRB will continue to review evaluations conducted in accordance with 10 CFR 50.59, which includes tests and experiments not described in the UFSAR and other proposed changes to the TSs and license amendments relating to nuclear safety, except in those cases where the licensing change is identical to a previously approved change. The review of other regulatory evaluations, such as those conducted in accordance with § 50.54 or § 72.48, will not require PRB review under the proposed change. However, these evaluations may be reviewed at the discretion of PRB members or the site VP.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
	Vogtle 3&4 will adopt the fleet approach where the PRB reviews proposed changes to the facility that screen in for a "full evaluation" in accordance with § 52 Appendix D. The current process described in the NDQAM calls for the independent review of proposed changes to the facility that includes the review of "screenings" (proposed changes that don't screen in for a full evaluation, also referred to as changes that "screen out").	Current NDQAM Part II Section 8.1.1 Reviews proposed changes to the facility as described in the safety analysis report (SAR) and verifies that changes do not adversely affect safety and if a technical specification change or NRC review is required.	Vogtle 3&4 will adopt the language in the proposed QATR regarding the PRB's review of proposed changes to the facility. Specifically, the Vogtle 3&4 PRB will review "full evaluations" that are conducted in accordance with § 52 Appendix D (i.e., the Vogtle 3&4 PRB would no longer be required to review proposed changes that do not screen in for a full evaluation – "screenings"). This is consistent with the process in the current QATR governing PRB reviews at Farley, Hatch, and Vogtle 1&2. SNC's proposed QATR Part II, Subsection 2.5.1 related to the scope of the Independent Review to be conducted by the PRB, is consistent with NEI 06-14A, with clarifications that adopt the existing QATR language related to the review of 10 CFR 50.59 evaluations. The proposed QATR is acceptable as NEI 06-14A and SNC's current QATR satisfy the requirements of 10 CFR 50, Appendix B.
8	Part II, Subsection 2.5.1 The QATR requirement to perform a specific review of facility operations to detect potential safety hazards is removed in the proposed change. The description of the scope of reviews to be conducted by the PRB is provided in Subsection 2.5.1, which was relocated from Appendix A, Section 4.0, in the current QATR.	Current QATR, Appendix A, Section 4.0 "The PRB shall be responsible for: (i) Review of facility operations to detect potential safety hazards."	This is a RIC for Farley, Hatch, and Vogtle 1&2. Part II, Subsection 2.5 of the proposed QATR implements NEI 06-14A, Part V, Subsection 2.2, Independent Review, Option I. Consistent with NEI 06-14A, the proposed QATR provides for the independent review of violations, deviations, and events requiring reports to the NRC, per Subsection 2.5.1.4. The PRB will also review matters related to nuclear safety and corrective actions for significant conditions adverse to quality, per Subsections 2.5.1.5 and 2.5.1.6, respectively.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
			The independent reviews to be conducted under Subsection 2.5.1 of the proposed QATR will encompass "review of facility operations to detect potential safety hazards." Subsection 2.5.1 of the proposed QATR related to the scope of the Independent Review is consistent with NEI 06-14A, which the NRC found to satisfy 10 CFR 50, Appendix B.
9	N/A – no associated QATR section as the content is removed in the proposed change The QATR requirement to review proposed changes to the Independent Spent Fuel Storage Installation (ISFSI) TS or license is removed from the QATR in the proposed change. The description of the scope of reviews to be conducted by the PRB is provided in Subsection 2.5.1 of the proposed QATR, which was relocated from Appendix A, Section 4.0, in the current QATR.	Current QATR, Appendix A, Section 4.0 "The PRB shall be responsible for: (k) Review of proposed changes to the ISFSI Technical Specifications or license."	This is a RIC for Farley, Hatch, Vogtle 1&2, and Vogtle 3&4. SNC exercises a general license for the storage of spent fuel in an ISFSI pursuant to § 72.210. The ISFSI vendor holds the license and the process to review, submit and manage TSs or license changes. The vendor's QAP is required in accordance with § 72 Subpart G, and it is reviewed per § 72.144(e). Applications for amendments to the licenses are made in accordance with § 72.56. SNC is not a holder of a specific license and is not directly involved with the license amendment process for the ISFSI TSs or license. There is no regulatory requirement for a registered user to perform reviews of TS or license changes. The proposed change is consistent with regulations in 10 CFR 72 and is therefore compliant with 10 CFR 50 Appendix B.
10	Part IV, QA of the ISFSI, Audits In the proposed change, the following language is added after the existing sentence:	Current QATR, Appendix F, QA of the ISFSI, Audits "Audits are performed on a frequency not to exceed 36 months for quality activities	This is a RIC for Farley, Hatch, and Vogtle 1&2.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
	"A maximum extension not to exceed 25% of the audit interval shall be allowed. That is the maximum time between specific audits shall not exceed 45 months."	related to the operation and maintenance of the ISFSI."	The audit extension allowance is consistent with the approved SNC 10 CFR 50, Appendix B QA program, particularly, Part II, Section 18, Audits (Subsection 18.2.1.2 in the proposed QATR). Regulation § 72.140(d) specifies that a previously approved QAP that satisfies the requirements of Appendix B to Part 50, Subpart H to Part 71, or Subpart G to Part 72 will be accepted as satisfying the requirements of paragraph (b) of § 72.140, with an exception related to recordkeeping requirements. The allowance to extend audit intervals was previously found to be compliant with 10 CFR 50, Appendix B and can therefore be applied to audits of the ISFSI, in accordance with 10 CFR 72.140(d).
11.a	Part II, Subsection 2.5.1 In the proposed change, the independent reviews performed by the PRB will be conducted on a "periodic basis" versus "once per calendar month" in the current QATR.	Current QATR, Appendix A, Section 3.0 "The PRB shall meet at least once per calendar month, or more frequently if convened by the PRB Chairperson."	This is a RIC for Farley, Hatch, and Vogtle 1&2. Part II, Subsection 2.5.1 of the proposed QATR implements NEI 06-14A, Part V, Subsection 2.2, Independent Review, which states, "Activities occurring during the operational phase shall be independently reviewed on a periodic basis." The proposed change is consistent with NEI 06-14A, which the NRC found to satisfy 10 CFR 50, Appendix B.
11.b	Part II, Subsection 2.5.2.1 The description of the PRB membership is provided in Part II, Subsection 2.5.2.1 of the proposed QATR (relocated from Section 2.0 of Appendix A in the current QATR).	Current QATR, Appendix A, Section 2.0 Appendix A, Section 2.0, outlines the PRB membership in the current QATR. The current language can be reviewed in the mark-ups provided in Attachment 2.	This is a RIC for Farley, Hatch, and Vogtle 1&2. The proposed QATR implements NEI 06-14A, Part V, Subsection 2.2, Independent Review, Option I. Subsection 2.5.2.1 of the proposed QATR is consistent with NEI 06-14A, except that the

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
	In the proposed change, a degree of selectivity has been incorporated that provides additional flexibility and addresses potential independence requirements as they may arise. Currently, the PRB chair, vice-chair, and members are appointed, in writing, by the plant manager. In the proposed change, PRB membership appointments are less prescriptive, but the PRB will maintain the same level of collective technical knowledge and experience, as specified in Subsection 2.5.2.1 of the proposed QATR.		technical knowledge and experience areas remain as they are in the current QATR. The proposed change is consistent with NEI 06-14A and the current QATR; therefore, it is compliant with 10 CFR 50, Appendix B.
12	Part II, Subsection 2.5.2.1 The proposed change removes Vogtle 3&4's commitment to ANSI/ANS-3.1-1993 as it relates to the technical knowledge and experience of PRB members. The PRB membership will be governed by Subsection 2.5.2.1 of the proposed QATR.	Current NDQAM, Part II, Section 2, Subsection 8.2.2.1 "The review [of the results of independent review body reviews] is performed by a team consisting of personnel with experience and competence in the activities being reviewed, but independent from cost and schedule considerations and from the organizations responsible for those activities. The PRB chairman and the members of the PRB shall collectively possess technical knowledge and experience as described in Section 4.7 of ANSI/ANS-3.1-1993."	This is a RIC for Vogtle 3&4. The proposed change integrates Vogtle 3&4 into the fleet QATR. The PRB membership experience requirements for Vogtle 3&4 will be governed by Subsection 2.5.2.1 of the proposed QATR. The results of independent review body reviews are addressed by Subsection 2.5.3 of the proposed QATR, which provides for the use of outside consultants or organizations, as necessary. The proposed QATR implements NEI 06-14A, Part V, Subsection 2.2, Independent Review, Option I. Subsection 2.5.2.1 of the proposed QATR is consistent with NEI 06-14A, except that the technical knowledge and experience areas remain as they are in the current QATR for Farley, Hatch, and Vogtle 1&2.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
			The proposed change is consistent with NEI 06-14A and the current QATR; therefore, it is compliant with 10 CFR 50 Appendix B.
13	Part II, Subsection 2.5.3 Independent reviews addressed by Appendix B of the current QATR is relocated to Part II, Subsection 2.5.3 of the proposed QATR. The review can be supplemented by outside consultants or organizations, as necessary, to ensure the team has the requisite expertise and competence, per Subsection 2.5.3.1 of the proposed QATR. Management will determine the schedule and scope of review and the composition of the team performing the review, as specified in Subsections 2.5.3.3 and 2.5.3.4 of the proposed QATR.	Current QATR, Appendix B Appendix B, Independent Review, of the current QATR 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 review addresses matters that plant and corporate management determine warrant special attention, such as plant programs, performance trends, employee concerns, or other matters related to safe plant operations. The performance of the [PRB] is included in this review. The review is performed by a team consisting of personnel with experience and competence in the activities being reviewed, but independent from the organizations responsible for those activities. The review is supplemented by outside consultants or organizations as necessary to ensure the team has the requisite expertise and competence. Results are documented and reported to responsible management."	This is a RIC for Farley, Hatch, and Vogtle 1&2. In the proposed change, the results of independent review body reviews of matters involving the safe operation of the facility will be periodically independently reviewed. This will be implemented by Subsection 2.5.3 of the proposed QATR, which is consistent with NEI 06-14A, PART V, Subsection 2.2, Independent Review, Option I. The NRC found NEI 06-14A to satisfy 10 CFR 50, Appendix B. Therefore, the proposed change is justified.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
14	N/A – no associated QATR section as Appendix C of the current QATR is removed in the proposed change	Current QATR, Appendix C Appendix C of the current QATR describes the conduct of QA Surveillances and is removed in the proposed change. See Attachment 2 of this enclosure for the content in Appendix C of the current QATR.	This is a RIC for Farley, Hatch, and Vogtle 1&2. There is no regulatory requirement to perform QA surveillances to meet internal auditing requirements. SNC proposes to remove the commitment to perform QA surveillances from the QATR; however, SNC intends to maintain the option to perform surveillances and those activities will be controlled by procedure. This change will not reduce the effectiveness of the internal audit program that complies with 10 CFR 50 Appendix B.
15	N/A – no associated QATR section as Appendix D of the current QATR is removed in the proposed change	Current QATR, Appendix D Appendix D of the current QATR provides definitions of terms and states: "SNC uses the definitions of terms as provided in Section 4 of the Introduction of NQA-1-1994 in interpreting the requirements of NQA-1-1994 and the other standards to which the QATR commits. In addition, definitions are provided for the following terms not covered in NQA-1-1994: … ". See Attachment 2 of this enclosure for all defined terms in Appendix D of the current QATR.	This is a RIC for Farley, Hatch, and Vogtle 1&2. Definitions provided in Appendix D of the current QATR are from ANSI N18.7-1976/ANS-3.2, except "construction." The definition for construction is incorporated into Part II, Section 1, Subsection 1.2, Organizational Structure (Design and Construction). SNC considers removal of the Definitions from the QATR to be an administrative improvement. This is consistent with 10 CFR 50.54(a)(3) for assessing changes that may not be considered reductions in commitment and states, in part: "In addition to [QA] program changes involving administrative improvements and clarifications, spelling corrections, punctuation, or editorial items, the following changes are not considered to be reductions in commitment: … (v) The elimination of [QAP] information that duplicates language in [QA] regulatory guides and

RIC No.	Proposed QATR Part/Section Summary of Proposed Change	Current QATR or NDQAM Part/Section Current Requirement	Justification for Change
			[QA] standards to which the licensee is committed." Removal of the definitions from Appendix D of the current QATR is considered an administrative improvement. The definitions come from an endorsed standard and do not need to be duplicated in the QATR. The definition for "construction" is incorporated into the proposed QATR in Part II, Section 1, Subsection 1.2. Therefore, the proposed change satisfies 10 CFR 50, Appendix B.
16	N/A – no associated QATR section as Appendix E of the current QATR is removed in the proposed change	Current QATR, Appendix E Appendix E of the QATR provides information related to SNC procedures that govern the design, operation, and maintenance of its nuclear generating plants. See Attachment 2 of this enclosure for Appendix E of the current QATR.	This is a RIC for Farley, Hatch, and Vogtle 1&2. This appendix provides redundant information. The information in Appendix E was provided as equivalent requirements for meeting the positions in RG 1.33, Revision 2. SNC's commitment to RG 1.33, Rev. 2, is described in the proposed QATR in Part III, Regulatory Commitments. Also, 10 CFR 50, Appendix B, Criterion V, requires: "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished." SNC is committed to using Appendix A of RG 1.33 for establishing procedures required for plant operational phase activities. The proposed change is consistent with 10 CFR 50, Appendix B.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
17	Part III, Subsection 1.5.1 In the proposed change, Vogtle 3&4 will adopt the language from the QATR, which represents a RIC as it relates to regulatory commitments.	Current NDQAM, Part IV Part IV of the current NDQAM, Regulatory Commitments, states: "1.5.1 Regulatory Guide 1.33 describes a method acceptable to the NRC staff for complying with the Commission's regulations with regard to overall quality assurance program requirements for the operation phase of nuclear power plants. 1.5.2 SNC commits to this guidance and identifies conformance with it in FSAR Chapter 1, Appendix 1A."	This is a RIC for Vogtle 3&4. The proposed change is acceptable as the current QATR, Part III, Subsection 1.5.1, states: "[SNC] considers that the collective [QA] requirements of this QATR and the QA requirements of ASME NQA-1-1994 are equivalent to ANSI N18.7-1976/ANS-3.2 and Regulatory Guide 1.33, Revision 2. Consequently, [SNC] does not commit to ANSI N18.7-1976, or to Regulatory Guide 1.33, except that Appendix A of Regulatory Guide 1.33 shall be used as guidance for establishing the procedures required for plant operational phase activities." Regarding SNC's assertion that the collective requirements of the QATR and NQA-1-1994 are equivalent to N18.7-1976 and RG 1.33, Revision 2, the NRC stated in its June 21, 2007, letter approving SNC's QATR (ML071510506) that, "This approach has previously been approved by the NRC staff as an acceptable approach to adopting NQA-1-1994 as the basis for licensee QA programs." The proposed change for Vogtle 3&4 to adopt the language in Part III, Subsection 1.5.1 of the proposed QATR is acceptable and was previously accepted by the NRC. Therefore, the proposed change satisfies 10 CFR 50, Appendix B.
18	N/A – no associated QATR section as the content is not transferred from the NDQAM	Current NDQAM, Part II, Section 2.0, Subsection 5.0	This is a RIC for Vogtle 3&4. Farley, Hatch and Vogtle 1&2 use the NIEP to audit the QA programs for each utility every 36

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
	Part II, Subsection 5.0, of the NDQAM is not included in the proposed QATR. Upon implementation of the proposed change, the Vogtle 3&4 QAP will be audited consistently with the process used at Farley, Hatch, and Vogtle 1&2, which utilizes the Nuclear Industry Evaluation Program (NIEP) to audit the QAPs for each utility every 36 months. See Part II, Subsection 18.2.2 of the proposed QATR.	Subsection 5.0 is related to the periodic review of the QAP and states: "Management of those organizations implementing the QA program or portions thereof, assess the adequacy of that part of the program for which they are responsible to assure its effective implementation at least once each year or at least once during the life of the activity, whichever is shorter."	months. Vogtle 3&4 will be subject to this process when integrated into the fleet QATR. The justification is the same as the justification for RIC No. 19 below (use of NIEP).
19	N/A – no associated QATR section as the content is not transferred from the NDQAM Subsection 8.1.7 of the current NDQAM is not included in the proposed QATR. Upon implementation of the proposed change, the Vogtle 3&4 QAP will be audited consistently with the process used at Farley, Hatch, and Vogtle 1&2, which utilizes the NIEP to audit the QAPs for each utility every 36 months. See Part II, Subsection 18.2.2 of the proposed QATR.	NDQAM V25.0, Part II, Section 8.0 Subsection 8.1.7 related to the independent review function states: "Reviews the adequacy of the internal audit program every 24 months."	This is a RIC for Vogtle 3&4. Farley, Hatch and Vogtle 1&2 use the 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. On October 31, 2003, NMC requested approval of their QATR (ML033070155). The submittal included the independent review process. In a letter dated August 18, 2004, (ML042300115) the NRC submitted a request for additional information (RAI). RAI 1.4 stated, "The submittal proposes to eliminate the independent review program, described in section 4.3 of N18.7. If this program were eliminated … describe the oversight process that would ensure that the performance and effectiveness of the assessment and independent assessment programs are maintained."

RIC No.	Proposed QATR Part/Section Summary of Proposed Change	Current QATR or NDQAM Part/Section Current Requirement	Justification for Change
			On September 22, 2004 (ML042710439), NMC responded and stated, "At the present time, NMC is a member of the [NIEP], which is a cooperative effort among nearly all nuclear plant operators in the [USA]. This program provides for periodic (one to two years), comprehensive evaluations of the compliance and effectiveness of quality assurance/oversight activities at both the plant and corporate level. Performance is evaluated against several objectives to determine if oversight activities are effective at identifying problems and precursors to problems, and that identified problems are appropriately addressed. The NIEP process differs from previous cooperative audit programs in the level of persons performing the evaluations; NIEP Evaluations are expected to use management and senior management level personnel with the experience and judgment capabilities to critically assess effectiveness of the oversight function, as well as recommend improvements. Whether NMC remains a member of the NIEP or not, the NMC QATR establishes requirements such that the level of review is sufficient to identify whether the oversight (audit) process meets requirements established in the QATR and is effective." The NRC issued the Safety Evaluation Report on March 25, 2005, approving the NMC QATR (ML050700416). Therefore, the proposed change is acceptable and satisfies 10 CFR 50, Appendix B.
20	N/A – no associated QATR section as the content is not transferred from the NDQAM	Current NDQAM, Part II, Section 15.0 Subsection 1.7 states:	This is a RIC for Vogtle 3&4. ANSI N18.7-1976 does not provide a standard for trending of nonconformance dispositions in Section

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
	Part II, Section 15, of the proposed QATR addresses nonconforming materials, parts, or components. However, the requirements to review nonconformance dispositions and to report significant trends to management are not carried over into the proposed QATR. This is similar to RIC No. 3 and 4 for Farley, Hatch, and Vogtle 1&2.	"Nonconformance dispositions are reviewed for adequacy, analysis of quality trends, and reports provided to the designated management." Subsection 1.8 states: "Significant trends are reported to management in accordance with SNC procedures, regulatory requirements, and industry standards."	5.2.14, Nonconforming Items. Section 5.2.11, Corrective Actions, states, "In the case of significant conditions adverse to safety, the measures shall assure that the cause of the condition is determined, and corrective action taken shall be documented and reported to appropriate levels of management… ." Proposed QATR, Part II, Section 15, remains consistent with ANSI N18.7-1976/ANS-3.2 and NQA-1-1994, Supplement 15S-1, Section 4.4, Disposition, for addressing nonconforming materials, parts, or components. Subsection 15.1.3 of the proposed QATR invokes Section 16 of the QATR, Corrective Action. SNC's CAP provides the requirements to promptly identify, control, document, classify, correct, and trend conditions adverse to quality. SNC's CAP implementing procedures address management notifications, trending of conditions adverse to quality, and the management review of nonconformance dispositions (performed by the Management Review Committee or MRC). Furthermore, Part II, Section 3, Design Control, Subsection 3.1.3 of the proposed QATR provides that the disposition of nonconforming items as "use as is" or "repair" are reviewed by the SNC design organization or other authorized organizations. Section 15 of the proposed QATR meets the standards in ANSI N18.7-1976/ANS-3.2 and NQA-1-1994 related to dispositioning nonconformances for materials, parts, or components and is therefore compliant with 10 CFR 50 Appendix B.
21	Part II, Section 4.0	Current NDQAM, Part II, Section 15.0	This is a RIC for Vogtle 3&4.

Reduction in Commitment (RIC) Table – Summary and Justification of Proposed QATR Changes

RIC No.	**Proposed QATR Part/Section** **Summary of Proposed Change**	**Current QATR or NDQAM Part/Section** **Current Requirement**	**Justification for Change**
	The language from the NDQAM is not included in the proposed QATR. However, Subsection 4.1.2 of the QATR references reporting requirements and states: "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."	Subsection 2.0, Reporting Program, states: "SNC has appropriate interfaces between the NDQAP for identification and control of nonconforming materials, parts, or components and the non-QA Reporting Program to satisfy the requirements of 10 CFR 52, 10 CFR 50.55(e) and/or 10 CFR 21 during COL and construction and 10 CFR 21 during operations."	The language in Part II, Subsection 4.1.2 of the proposed QATR addresses reporting requirements related to procurement document control and is consistent with NEI 06-14A, Revision 7. The language in Part II, Subsection 4.1 of the proposed QATR is unchanged from the current QATR. 10 CFR 50.55(e) applies to activities prior to the Commission making the finding under 10 CFR 52.103(g); therefore, this no longer applies to Vogtle 3&4. The proposed change is consistent with regulation and NEI 06-14A, which the NRC found to satisfy 10 CFR 50, Appendix B.

ATTACHMENT 2 to NL-25-0067

Edwin I. Hatch Nuclear Plant, Units 1 and 2
Joseph M. Farley Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 3 and 4

Marked-up QATR Pages for Reductions in Commitment

Attachment 2 is intended to meet the requirements in 10 CFR 50.54(a)(4)(ii) related to submitting "all pages affected by that change." 10 CFR 50.54(a)(4)(ii) states (emphasis added):

(ii) The submittal of a change to the Safety Analysis Report quality assurance program description must include all pages affected by that change and must be accompanied by a forwarding letter identifying the change, the reason for the change, and the basis for concluding that the revised program incorporating the change continues to satisfy the criteria of appendix B of this part and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC (the letter need not provide the basis for changes that correct spelling, punctuation, or editorial items).

The following table provides a road map for reviewing the QATR mark-ups related to each reduction in commitment (RIC). Note that markups of the NDQAM are not being provided as the NDQAM will be inactivated upon issuance of the proposed QATR. The proposed QATR is being submitted, in its entirety, as Attachment 3. Additional markups can be made available for NRC audit, if needed.

RIC No.	Mark-up Included	Comment
1	Yes	Corporate senior manager positions described in RIC #1 are removed in the proposed change starting with the senior manager responsible for fleet operations. See Attachment 1 and the mark-up for all corporate positions removed from the QATR in the proposed change.
2	Yes	Site senior manager positions described in RIC #2 are removed in the proposed change starting with the senior manager responsible for maintenance. See Attachment 1 and the mark-up for all site positions removed from the QATR in the proposed change.
3	Yes	The QATR requirement related to the review of nonconformance dispositions for reporting to the site VP is removed in the proposed change.
4	Yes	The QATR requirement related to the reporting of significant trends to the site VP is removed in the proposed change.
5	Yes	Appendix C, QA Surveillances, of the current QATR is removed in the proposed change. The mark-up reflects a change to the text to remove the reference to Appendix C and to provide flexibility for the use of surveillances, which will be controlled by procedure.
6	Yes	Appendix A, Plant Review Board, is removed in the proposed change and the meeting quorum requirements are not carried over to Subsection 2.5, Independent Review, in the proposed QATR.
7	Yes	Appendix A, Plant Review Board, is removed in the proposed change and the requirements to perform reviews of specific regulatory evaluations are not carried over to Subsection 2.5.1 in the proposed QATR.

8	Yes	Appendix A, Plant Review Board, is removed in the proposed change and the specific language to conduct a review of facility operations to detect potential safety hazards is not carried over to Subsection 2.5.1 in the proposed QATR.
9	Yes	Appendix A, Plant Review Board, is removed in the proposed change and the requirement to conduct a review of proposed changes to the ISFSI TSs or license is removed in the proposed QATR.
10	Yes	The mark-up reflects the audit extension allowance being added to the audits of the ISFSI.
11.a	Yes	Appendix A, Plant Review Board, is removed in the proposed change and content related to the conduct of the PRB is being relocated to Subsection 2.5 in the proposed QATR. Subsection 2.5.1 of the proposed QATR contains the requirement for PRB meeting frequency ("on a periodic basis").
11.b	Yes	Appendix A, Plant Review Board, is removed in the proposed change and content related to the conduct of the PRB is being relocated to Subsection 2.5 in the proposed QATR. Subsection 2.5.2.1 of the proposed QATR contains the requirement for PRB membership.
12	No	This RIC is related to the NDQAM, which will be inactivated upon issuance of the proposed QATR. There would be no value in providing a mark-up as all text would be stricken through. The current version of the NDQAM can be made available for NRC audit, if needed.
13	Yes	Appendix B, Independent Review, is being removed in the proposed change and content related to the review of the results of independent review body reviews is being relocated to Subsection 2.5.3.
14	Yes	Appendix C, Quality Assurance Surveillances, is being removed in the proposed QATR.
15	Yes	Appendix D, Definitions, is being removed in the proposed QATR.
16	Yes	Appendix E, Procedures, is being removed in the proposed QATR.
17	No	These RICs are related to the NDQAM, which will be inactivated upon issuance of the proposed QATR. There would be no value in providing a mark-up as all text would be stricken through. The current version of the NDQAM was submitted to the NRC on March 24, 2025 (ML25083A242).
18	No	
19	No	
20	No	
21	No	

PART II QUALITY ASSURANCE PROGRAM DETAILS

SECTION 1 ORGANIZATION

1.1. General

1.1.1. This Section describes the SNC organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAP implementation.

1.1.2. The organizational structure includes corporate functions and onsite functions for each plant. The applicable site Final Safety Analysis Report (FSAR) and implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of this QATR.

~~1.1.1.~~1.1.3. As the top-level document describing QA program requirements, generic titles are used in the QATR to describe required elements and organization structure, as necessary to maintain appropriate independence of the QA ~~organization, and~~organization and are not intended to reflect specific titles within the organization. Specific titles identifying individuals responsible for implementation of QA program elements are provided in the conduct of operations ~~described in Chapter 13 of~~procedures for the applicable ~~site FSAR~~department. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

1.2. Organizational Structure (Design and Construction)

Initial Design and Construction phases of the Farley Nuclear Plant, the Hatch Nuclear Plant, and the Vogtle Electric Generating Plant (collectively “Plants”) are complete. This program does not cover Construction Phase activities. However, major rework or modification activities may occur during the Operations Phase that are similar in nature to activities performed during the Construction Phase such as, but not limited to, steam generator replacement, cooling tower replacement, and ISFSI installation.

1.3. Organizational Structure (Operations Phase)

This section describes the SNC nuclear operations organizational structure, functional responsibilities, levels of authority and important interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes corporate and onsite functions and interface responsibilities for multiple organizations that perform quality-related functions. Implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of the QAPD. Specific titles identifying certain positions responsible for implementation of QA program elements are also provided in the conduct of operations procedures for the applicable department.

The nuclear operations organization, under the direction of the president and CEO, has direct

responsibility for the operation and maintenance of the Plants.
~~The nuclear operations organization, under the direction of the president and CEO, has direct responsibility for the operation and maintenance of the Plants. The president and CEO reports to the SNC Board of Directors.~~

~~The SNC corporate organization is responsible for assuring the availability of and providing technical support for the Plants. Support capability is available through the efforts of the SNC corporate staff. In addition to being the licensee, SNC also serves as its own architect/engineer.~~

The structure of the nuclear operations organization is described in the following paragraphs.

1.3.1. CORPORATE ORGANIZATION

This Section provides information concerning functions, responsibilities, and organizational structure of the corporate staff responsible for the management and technical support of the Plants. These corporate organizations provide support for operations and maintenance of the plants including general management, licensing, design configuration, design basis maintenance, procurement, testing, quality assurance, emergency planning, and security of the plant during the operations phase of the Plants. SNC management is responsible for directing activities of the Plant organizations, as well as the corporate support organizations. The corporate organizations function in a support role to the Plants.

1.3.1.1.President and CEO

The SNC President and Chief Executive Officer (president/CEO) is responsible for all aspects of operation of Southern Company's nuclear plants, including employment decisions. The president/CEO is also responsible for all technical and administrative support activities provided by SNC and non-affiliated contractors. The President/CEO directs the chief nuclear officer/executive vice president, senior vice president - technical support, vice president - general counsel, and director - finance in fulfillment of their responsibilities. The president/CEO provides day to day technical directions to the vice president human resources. ~~-~~The president/CEO reports to the SNC Board of Directors with respect to all matters.

1.3.1.1.1. Chief Nuclear Officer / Executive Vice President

The chief nuclear officer/executive vice president (CNO/EVP) is responsible for the safe, reliable, and efficient operation of the Joseph M. Farley Nuclear Plant (FNP), the Edwin I. Hatch Nuclear Plant (HNP), and the Alvin W. Vogtle Electric Generating Plant (VEGP). The chief nuclear officer directs the vice president – sites, the vice president – engineering and the senior ~~General~~ m~~M~~anager responsible ~~Responsible~~ for g~~G~~overnance and o~~O~~versight. The chief nuclear officer has overall responsibility for establishing quality policy and implementation of the quality program. The authority to accomplish quality assurance functions is delegated to the staff as necessary to fulfill the identified responsibilities. The senior manager responsible for nuclear oversight will have the authority and organizational freedom, including sufficient independence from cost and schedule to escalate matters directly to the CNO/EVP if needed to ensure that quality concerns and/or nuclear safety considerations are addressed.

~~1.2.1.1.1.1.1 Vice President – Site~~

~~The vice president – site for each Plant reports to the chief nuclear officer regarding operation issues and support matters, and is responsible for operation, maintenance, and technical support of the respective Plant over which they have authority. A vice president – site directs the plant manager, the senior manager responsible for engineering, the regulatory affairs manager, the senior manager responsible for security, and the senior manager responsible for training for each respective plant. The vice president – site has overall responsibility for the execution of the administrative controls and quality assurance program at the respective plant to assure nuclear safety for that plant.~~

1.2~~3~~.1.1.1.1 ~~G~~Senior manager responsible for governance and oversight ~~general manager~~

The ~~governance and oversight general~~ senior manager responsible for governance and oversight reports to the chief nuclear officer. This individual is responsible for identifying and resolving fleet issues and utilizing trends, operating experience, and industry best practices to improve fleet performance. The senior ~~governance and oversight general~~ manager responsible for governance and oversight directs the senior managers responsible for fleet operations, fleet maintenance, fleet environmental and chemistry, fleet radiation protection, fleet industrial safety, fleet training, fleet engineering, and fleet organizational effectiveness (which also oversees the corrective action program). ~~-~~In addition, the senior ~~governance and oversight general~~ manager responsible for governance and oversight is responsible for ensuring governance and oversight for information technology.

RIC #1

~~1.2.1.1.1.2.1 Senior manager responsible for fleet operations~~

~~The senior manager responsible for fleet operations is responsible for governance and oversight of nuclear plant operations and related functions. The senior manager responsible for fleet operations also establishes policy level guidance, provides strategic direction to plant operations departments regarding operating practices and standards, evaluates programs for conformance to industry best practices, and drives performance improvements~~ where needed.

~~1.2.1.1.1.2.2 Senior manager responsible for fleet maintenance~~

~~The senior manager responsible for fleet maintenance is responsible for overall governance and oversight of nuclear plant maintenance and operational focus through equipment reliability by facilitating timely identification, screening, scoping, planning, scheduling, coordination~~, and ~~execution of work necessary to maximize the availability and reliability of plant equipment and systems and related functions. These responsibilities include conducting activities in a manner that reflects ownership and commitment to the safe and world-class operation of each nuclear station by employing sound principles and quality practices that achieve high reliability, preservation, availability of structures, systems, and components. The senior manager responsible for fleet maintenance also establishes policy level guidance, provides direction to plant maintenance departments regarding maintenance practices, and drives performance improvements~~ where needed.

~~1.2.1.1.1.2.3 Senior manager responsible for radiation protection~~

~~The senior manager responsible for radiation protection is responsible for providing governance and oversight of the radiation protection program for each nuclear station~~ by minimizing

~~radiation exposure to plant personnel, contractors, members of the public, and the environment to levels as low as reasonably achievable (ALARA) while supporting safe, reliable, and effective power generation.~~

~~1.2.1.1.1.2.4 Senior manager responsible for environmental and chemistry~~

~~The senior manager responsible for environmental and chemistry is responsible for providing governance and oversight of fleet environmental and chemistry activities.~~

~~1.2.1.1.1.2. 5 Senior manager responsible for fleet industrial safety~~

~~The senior manager responsible for fleet industrial safety and health is responsible for governance and oversight to ensure comprehensive processes are in place to protect employees from workplace-related industrial accidents. This is primary accomplished through ensuring governance and process are in place that meet federal OSHA regulatory requirements.~~

~~1.2.1.1.1.2.6 Senior manager responsible for fleet training~~

~~The senior manager responsible for fleet training is responsible for overall governance and oversight of training and qualification related functions. The senior manager responsible for fleet training establishes policy level guidance, provides direction to nuclear plant training departments regarding practices and standards, evaluates programs for conformance to industry best practices, and drives improvements where needed.~~

~~1.2.1.1.1.2.7 Senior manager responsible for fleet engineering~~

~~The senior manager responsible for fleet engineering is responsible for governance and oversight of design and fleet plant support (programs, and equipment reliability). The senior manager responsible for fleet engineering is also responsible for standardization, long-term resource planning, and promoting best practices~~.

~~1.2.1.1.1.2.8 Senior manager responsible for fleet organizational effectiveness~~

~~The senior manager responsible for fleet organizational effectiveness is responsible for overall governance and oversight for fleet organizational effectiveness. The senior manager responsible for fleet organizational effectiveness fleet organizational effectiveness manager is responsible for oversight and management of the corrective action and performance improvement programs. The fleet organizational effectiveness manager establishes policy level guidance, provides direction to each site's nuclear plant organizational effectiveness staffs regarding practices and standards, evaluates programs for conformance to industry best practices, and drives performance improvement where needed.~~

1.~~2~~3.1.1.1.~~4~~2 Vice President – Engineering

The vice president – engineering is responsible for providing plant specific and generic engineering support in the areas of nuclear fuels and analysis, design and procurement engineering, plant support, and project management for improvement projects. The vice

president – engineering is responsible for assuring that specialized engineering expertise is available as needed for normal operations and emergency situations, ensuring the fleet is prepared to respond safely to a severe accident, assessing nuclear industry issues through contact with owners and ad hoc groups, nuclear utility interfaces, assuring that documentation and records of design activities are properly maintained. The vice president – engineering directs the senior managers responsible for central design engineering, ~~the senior manager responsible for~~ fleet plant support, and ~~the senior manager responsible for~~ fleet nuclear fuel.

~~1.2.1.1.1.3.1 Senior manager responsible for fleet nuclear fuel~~

~~The senior manager responsible for fleet nuclear fuel is responsible for governance and oversight, support, and perform for nuclear fuel. Additional responsibilities include governance and oversight of nuclear fuel procurement, nuclear fuel and core design, nuclear fuel reload licensing, nuclear fuel performance, dry cask storage fuel selection, and nuclear fuel vendor oversight affecting plant sites and the corporate office.~~

~~1.2.1.1.1.3.2 Senior manager responsible for central design engineering~~

~~The senior manager responsible for central design engineering is responsible for development of modifications, the creation, revision and retention of calculations, domestic documents, vendor drawings, and other design basis material. Staff may be located at both the corporate office and site locations (Farley, Hatch, Vogtle). Additional responsibilities include the corporate support to the plants in the areas of seismic and stress analysis, cyber security, and procurement engineering. Procurement engineering provides technical guidance and support for Supply Chain procurement activities.~~

~~1.2.1.1.1.3.3 Senior manager responsible for fleet plant support engineering~~

~~The senior manager responsible for fleet plant support engineering is responsible for corporate governance, oversight, support and perform roles to the plants in matters related to component engineering, in-service testing and inspection programs, equipment operability and reliability issues, fire protection, and environmental qualification.The senior manager responsible for fleet plant support engineering is responsible for standardization, long term resource planning, and promoting best practices.~~

1.~~2~~3.1.1.2 Senior Vice President – Technical Support

The senior vice president – t~~T~~echnical s~~S~~upport reports to the President/CEO and is responsible for developing the overall licensing strategy for the operating fleet and managing relationships with Nuclear Regulatory Commission (NRC) and other governmental authorities. The s~~S~~enior v~~V~~ice p~~P~~resident – t~~T~~echnical s~~S~~upport is also responsible for overall execution of refueling outages, major capital projects, nuclear development efforts for Southern Nuclear. In addition, the senior vice president – technical support is responsible for Southern Nuclear Services including execution of the Pooled Inventory Management Program, the national Strategic Alliance for FLEX Emergency Response (SAFER) response centers and consulting efforts on AP1000 experience. The senior vice president – technical support directs the vice president - regulatory affairs, the senior manager responsible for fleet outage services~~fleet outage services general manager~~, the senior manager responsible for fleet projects~~fleet capital project general manager~~, and the external affairs and communications director.

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1.~~2~~3.1.1.2.1 Vice President – Regulatory Affairs

The vice president – regulatory affairs is responsible for licensing and interface activities with the Nuclear Regulatory Commission for the fleet~~, including Vogtle 3 and 4~~. The vice president – regulatory affairs provides organizational support and ensures prompt and proper disposition of regulatory issues, develops regulatory positions and advises senior management on priorities and activities affecting regulatory issues at the nuclear sites. Other responsibilities include developing policies and standardized processes and procedures for the maintenance of the licensing basis, the preparation of submittals to the NRC and other regulatory organizations, and the dissemination of regulatory and operational experience information, environmental and chemistry, and security. The vice president – regulatory affairs directs the fleet regulatory affairs director, senior manager responsible for security programs, senior manager responsible for fleet emergency preparedness, and the senior manager responsible for risk informed engineering which also oversees safety analysis engineering.

~~1.2.1.1.2.1.1 Fleet regulatory affairs director~~

~~The fleet regulatory affairs director directs the senior manager responsible for environmental, the senior manager responsible for regulatory compliance and the senior manager responsible for licensing. The senior manager responsible for regulatory compliance and the senior manager responsible for licensing are responsible for providing corporate support to the Plants in matters related to licensing and regulatory compliance.~~

~~1.2.1.1.2.1.1.1 Senior manager responsible for regulatory compliance~~

~~The senior manager responsible for regulatory compliance is the primary interface with the Nuclear Regulatory Commission (NRC) and has the responsibility to evaluate regulatory information, and translate NRC requirements.~~

~~1.2.1.1.2.1.1.2 Senior manager responsible for licensing~~

~~The senior manager responsible for licensing is responsible for maintaining the Final Safety Analysis Report (FSAR), Technical Specifications, and other licensing documents for each Plant to include being responsible for preparation of submittals to the NRC and other regulatory organizations. The position is also responsible to provide oversight of the Document Services and Procedure Management programs.~~

~~1.2.1.1.2.1.1.3 Senior manager responsible for environmental~~

~~The senior manager responsible for environmental is responsible for providing supervision, direction, and implementation of the environmental, transportation, navigation, endangered species, Radiological Environmental Monitoring Programs (REMP), and the Environmental Protection Plans. This position also evaluates programs for conformance to industry standards and formalizes this into governing procedures where needed, monitors and reports performance results to assure functional area expectations are met, and manages external relationships with regulatory and industry oversight agencies, utility and industry peers, industry groups and other~~

~~advisory groups.~~

~~1.2.1.1.2.1.2 Senior manager responsible for security programs~~

~~The senior manager responsible for security programs provides matrix accountability to the Vice President Regulatory Affairs for matters related to fleet security, access, Energy Center security, medical and FFD services. This position is responsible for designing and implementing an integrated FFD and Access function for SNC as well as providing transitional leadership during key organizational changes in security.~~

~~The senior manager responsible for Security Programs is responsible for establishing and maintaining a regulation-based, physical protection program which will provide high assurance that all site activities involving special nuclear materials are not contrary to the common defense nor constitute an unreasonable risk to the public. The SNC security program must assure effective physical, tactical and administrative controls to prevent radiological sabotage and to thwart the theft of special nuclear materials at SNC's nuclear facilities. The position is also responsible for providing oversight with respect to maintenance of the site-specific security plan, training and qualification plan, and contingency plan (collectively known as the Site Physical Security Plan) for each SNC Plant.~~

~~1.2.1.1.2.1.3 Senior manager responsible for fleet emergency preparedness~~

~~The senior manager for fleet emergency preparedness is responsible for oversight of the emergency preparedness programs, the site Emergency Plans and emergency response communications, and the corporate emergency preparedness programs (including the common Emergency Operations Facility.~~

1.~~2~~3.1.1.2.2 Senior manager responsible for fleet outage services~~Fleet Outage Services General Manager~~

The senior manager responsible for fleet outage services ~~fleet outage services general manager~~ is responsible for managing members of the outside alliance partners as they are involved with outage preparation, outage closeout, and program assessment activities pertaining to fuel handling including dry storage. The s~~S~~enior manager responsible for fleet outage services is also responsible for establishing policy level guidance and procedures; for providing oversight to plant staffs regarding outage preparation and dry storage activities; establishes the common approach for the execution of refueling outages; ensuring refueling and turbine outage activities are integrated and supported; evaluates programs for conformance to industry best standards; and drives performance improvements where needed.

~~1.2.1.1.2.2.1 Senior manager responsible for fleet operations~~

~~The senior manager responsible for fleet operations is responsible for governance and oversight of nuclear plant operations and related functions. The senior manager responsible for fleet operations also establishes policy level guidance, provides strategic direction to plant operations departments regarding operating practices and standards, evaluates programs for conformance to industry best practices, and drives performance improvements where needed.~~

1.~~2~~3.1.1.2.3 Senior manager responsible for fleet projects~~Fleet Capital Project General Manager~~

The senior ~~fleet capital project general~~ manager responsible for fleet projects is responsible for governance, oversight,
support and performance for major project management at the site and fleet level. The senior manager responsible for fleet projects directs the project management organization manager, the manager of fleet projects, and the senior managers responsible for site projects.

1.~~2~~3.1.1.3 Vice President - General Counsel

The vice president and general council reports directly to the President/CEO. The vice president and general counsel is responsible for compliance, employee concerns, and the Quality Assurance Program (QAP) oversight for SNC. The vice president and general counsel directs the senior manager responsible for~~of~~ compliance of~~for~~ nuclear programs.

1.3.1.1.3.1 Senior manager responsible for~~of~~ compliance of~~for~~ nuclear programs

The senior manager responsible for~~of~~ compliance of~~for~~ nuclear programs reports to the senior manager of g~~G~~eneral c~~C~~ounsel and directs the senior manager responsible for n~~N~~uclear o~~O~~versight.

1.~~2~~3.1.1.3.~~1~~2 Senior manager responsible for nuclear oversight

The senior manager responsible for nuclear oversight is responsible for SNC nuclear oversight activities using staffs located at corporate headquarters and at each of the operating plants. This includes ensuring implementation of the QA program in accordance with regulatory commitments. The nuclear oversight organization provides comprehensive independent audits of safety-related activities to verify that they are in compliance with the quality assurance program. The senior manager responsible for nuclear oversight will have the authority and organizational freedom, including sufficient independence from cost and schedule to escalate matters directly to the CNO/EVP if needed to ensure that quality concerns and/or nuclear safety considerations are addressed. ~~The nuclear oversight organization also performs QA Surveillance activities as described in Appendix C of this QATR.~~

1.~~2~~3.1.1.4 Senior manager responsible for supply chain

The senior manager responsible for supply chain reports directly to the vice president – supply chain management – Southern Company and is responsible for the areas of procurement, procurement document control, development of sources of supply including the selection of suppliers to be awarded purchase orders or contracts, and materials management activities.

1.~~2~~3.2 STANDARD PLANT ORGANIZATION

The onsite operating organization shall provide, as part of the normal duties of plant supervisory personnel, timely and continuing monitoring of operating activities to assist the vice president – site in keeping abreast of general plant conditions and to verify that the day-to-day operating activities are conducted safely and in accordance with applicable administrative controls. The onsite Operating organization shall include one or more individuals knowledgeable in the following fields: nuclear power plant operation; nuclear power plant, mechanical, electrical and electronic systems; nuclear engineering; chemistry and radiochemistry; radiation protection; and quality assurance.

1.3.2.1 Vice President – Site

The vice president – site for each Plant reports to the CNO/EVP~~chief nuclear officer~~ regarding operation issues and support matters, and is responsible for operation, maintenance, and technical support of the respective Plant over which they have authority. A vice president – site directs the plant manager, the senior manager responsible for engineering, the regulatory affairs manager, the senior manager responsible for security, and the senior manager responsible for training for each respective plant. The vice president – site has overall responsibility for the execution of the administrative controls and quality assurance program at the respective plant to assure nuclear safety for that plant.

1.~~2~~3.2.1.1 Plant Manager

The plant manager (PM) is responsible for direct management of the plant, including operations, maintenance, refueling, industrial safety, and technical and administrative activities. The PM is responsible for:

A. Compliance with the requirements of the operating license, Technical Specifications, and quality assurance program, and

B. Approval, prior to implementation, of each proposed test, experiment, or modification to systems or equipment that impact nuclear safety.

The PM directs senior managers responsible for maintenance, operations, environmental and chemistry, radiation protection, and ~~work management~~outages.

SNC plants maintain a plant review board (PRB) at each plant to review overall plant operations and advise plant site management on matters related to nuclear safety Part II, Section 2 ~~Appendix A~~provides a detailed description of these PRBs.

RIC #2

~~1.2.2.1.1 Senior manager responsible for maintenance~~

~~The senior manager responsible for maintenance directs the maintenance personnel in performance of preventive maintenance, repair of plant equipment, performance of peer quality control measures, and maintenance support utilizing contractor craft personnel. This includes facilitating timely identification, screening, scoping, planning, scheduling,~~

~~coordination, and execution of work necessary to maximize the availability and reliability of plant equipment and systems.~~

~~1.2.2.1.2 Senior manager responsible for operations~~

~~The senior manager responsible for operations is responsible for the safe and reliable operation of the plant. This includes unit operations; day-to-day planning; technical support; preparation for and conduct of outage related activities; and overseeing outage work activities, surveillances, and tests.~~
~~In addition, operating personnel responsibilities include:~~

~~The reactor operator's authority and responsibility for shutting down the reactor when it is determined that the safety of the reactor is in jeopardy or when operating parameters exceed any of the reactor protection system set points and automatic shutdown does not occur.~~

~~The responsibility to determine the circumstances, analyze the cause, and determine that operations can proceed safely before the reactor is returned to power after a trip or an unexplained or unscheduled power reduction.~~

~~The senior reactor operator's responsibility to be present at the plant and to provide direction for returning the reactor to power following a trip or an unscheduled or unexplained power reduction.~~

~~The responsibility to believe and respond conservatively to instrument indications unless they are proved to be incorrect.~~

~~The responsibility to adhere to the plant's Technical Specifications.~~

~~The responsibility to review routine operating data to assure safe operation.~~

- ~~The responsibility to take action to minimize personnel injury or damage to the facility and to protect the health and safety of the public in the event of an emergency not covered by approved procedures.~~

~~1.2.2.1.3 Senior manager responsible for chemistry~~

~~The senior manager responsible for environmental and chemistry is responsible for chemical and radiochemical activities at the plant; chemistry related engineering activities including filter / demineralizer control and hydrogen water chemistry; administrative control of effluent releases from the plant to ensure that the releases are maintained as low as reasonably achievable (ALARA) and within the required limits; and implementing primary, secondary, and component cooling water chemistry programs. This position is also responsible for environmental compliance per local, state and federal regulations.~~

~~1.2.2.1.4 Senior manager responsible for radiation protection~~

~~The senior manager responsible for radiation protection is responsible for the radiation protection and for the maintenance of all required radiation exposure records of plant support and visiting personnel; and provides radiation surveys and minimization of occupational radiation exposure (ALARA program); manages the shipping and receiving of all byproduct, source, and special nuclear material except fuel; manages the radwaste management program including radwaste cleaning / processing performed by operations; and manages the personnel dosimetry and respiratory protection programs.~~

~~1.2.2.1.5 Senior manager responsible for outages~~

~~The senior manager responsible for outages is responsible for ensuring maximum advantage is taken of forced outages and load reductions to do needed repair, replacement, modification, and inspection work; working with Maintenance to ensure management control of work is accomplished through the use of an effective priority system; preparing Outage Safety Assessments in support of scheduled refueling outages; and conducting ongoing outage risk assessments.~~

~~1.2.2.2 Senior manager responsible for regulatory affairs~~

~~The senior manager responsible for regulatory affairs reports directly to the vice president – site and is responsible for supporting the operations and maintenance of the plant. This includes providing direction for emergency preparedness and the licensing manager.~~

1.~~2~~3.2.~~4~~1.2 Senior manager responsible for engineering

The senior manager responsible for engineering reports directly to the vice president – site. The senior manager responsible for engineering serves as the engineering lead for the respective site and is responsible for plant support (including equipment reliability, engineering programs, quality control, systems engineering), site design engineering, reactor engineering, and plant modifications. The senior manager responsible for engineering is responsible for standardization, long-term resource planning, and promoting best practices.

1.~~2~~3.2.~~5~~1.3 Senior manager responsible for training

The senior manager responsible for training reports directly to the vice president – site and is responsible for developing and maintaining a training / retraining program for plant personnel that meets requirements for INPO accreditation and that meets the respective site-specific security plan and emergency response plans; and maintaining the training simulator. Implementation of initial and continuing non-accreditation training programs is the responsibility of applicable non-licensed departmental managers and supervisors.

~~1.2.2.5 Senior manager responsible for security~~

~~The senior manager responsible for plant security is responsible to maintain the security department in accordance with the respective site-specific security plan, training and~~

~~qualification plan, and contingency plan (collectively known as the Site Physical Security Plan) for the Plant; control safeguards material; maintain interfaces with offsite agencies; and coordinate the security drill and exercise program. The position is also responsible for maintaining the Site Physical Security Plan. The senior manager responsible for plant security reports to the site vice president.~~

1.4 Independent Oversight

Independent Oversight is implemented through Nuclear Oversight, the quality verification process and the Plant Review Board. Personnel performing independent oversight have direct access to responsible management at a level where appropriate action can be affected to address issues related to quality and report to a management level such that required authority and organizational freedom are provided, including sufficient independence from cost and schedule considerations.

1.4.1 A senior manager responsible for nuclear oversight reports to senior manager responsible for compliance of nuclear programs and is responsible to ensure the quality assurance program is established, maintained, and effectively executed throughout the Nuclear Fleet. The senior manager responsible for nuclear oversight will have the authority and organizational freedom, including sufficient independence from cost and schedule to escalate matters directly to the CNO/EVP if needed to ensure that quality concerns and/or nuclear safety considerations are addressed.

1.4.2 Quality verifications are performed by individuals with responsibility to the site Engineering organization and as described in section 10 of this QATR.

1.4.3 Plant Review Board
The independent review function is implemented through the Plant Review Board (PRB) is described in section 2.5 of this QATR and results reported to the Plant Manager.

~~1.4~~1.5 NQA-1-1994 Commitment

In establishing its organizational structure, SNC commits to compliance with NQA-1-1994, Part ~~II,~~ Basic Requirement 1 and Supplement 1S-1.

SECTION 15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

15.1. General

15.1.1. SNC has established the necessary measures and governing procedures to control items, including services, which do not conform to specified requirements to prevent inadvertent installation or use.

15.1.2. Controls provide for identification, documentation, evaluation, segregation when practical, and disposition of nonconforming items, and for notification to affected organizations~~.~~.

15.1.3. ~~These c~~Controls require ~~that an individual discovering~~ a nonconforming condition ~~to identify~~ is identified, described, and documented ~~the nonconformance~~ in accordance with Section 16, Corrective Action, of this QATR.

15.1.4. Controls are provided to address conditional release of nonconforming items for use on an at risk basis prior to resolution and disposition of the nonconformance, including maintaining identification of the item and documenting the basis for such release.

15.1.5. Conditional release of nonconforming items for installation requires the approval of the vice president - site or his designee. Nonconformances are corrected or resolved prior to depending on the item to perform its intended safety function.

15.1.6. Nonconformances are evaluated for impact on operability of quality structures, systems, and components to assure that the final condition does not adversely affect safety, operation, or maintenance of the item or service.

15.1.7. Nonconformances to design requirements dispositioned repair or use-as-is, shall be subject to design control measures commensurate with those applied to the original design.

RIC #3

~~Nonconformance dispositions are reviewed for adequacy, analysis of quality trends, and reports provided to the vice president - site. Significant trends are reported to the vice president - site in accordance with SNC procedures, regulatory requirements, and industry standards.~~

RIC #4

~~15.1.~~15.2. ~~15.1~~ NQA-1-1994 Commitment

In establishing measures for nonconforming materials, parts, or components, SNC commits to compliance with NQA-1-1994, Basic Requirement 15, and Supplement 15S-1.

SECTION 16 CORRECTIVE ACTION

16.1. General

16.1.1. SNC has established the necessary measures and governing procedures to promptly identify, control, document, classify, and correct conditions adverse to quality.

16.1.2. SNC procedures require personnel to identify known conditions adverse to quality and assure that corrective actions are documented and initiated in accordance with regulatory guidance and applicable quality standards.

16.1.3. When complex issues arise where it cannot be readily determined if a condition adverse to quality exists, SNC documents establish the requirements for documentation and timely evaluation of the issue.

16.1.4. Results of evaluations of conditions adverse to quality are analyzed to identify trends. Significant conditions adverse to quality and significant adverse trends are documented and reported to responsible management.

~~16.1.~~16.2. ~~16.1~~ NQA-1-1994 Commitment

In establishing provisions for corrective action, SNC commits to compliance with NQA-1-1994, Basic Requirement 16.

SECTION 18 AUDITS

18.1. General

18.1.1. SNC has established the necessary measures and governing procedures to implement audits to verify that activities covered by this QATR are performed in conformance with the requirements established. The audit programs are themselves reviewed for effectiveness as a part of the overall audit process. ~~In addition to audits, SNC commits to perform surveillances as described in Appendix C to this QATR.~~ In addition to audits, SNC may also provide oversight with surveillances.

RIC #5

18.2. ~~18.1~~ Performance of Audits

18.2.1. Audits of facility activities shall be performed within the specified time interval with the following allowances (allowances do not apply to audits of the emergency plan and security plan):

18.2.1.1. Audits shall be performed at the intervals designated herein for each audit area. Schedules shall be based on the month in which the audit starts.

18.2.1.2. A maximum extension not to exceed 25% of the audit interval shall be allowed. That is, for audits on a 36 month frequency, the maximum time between specific audits shall not exceed 45 months. For audits on a 24 month frequency, the maximum time between specific audits shall not exceed 30 months. Likewise, audits on an annual (12 month) frequency shall not be extended beyond 15 months.

18.2.1.3. When an audit interval extension greater than one month is used, the next audit for that particular audit area will be scheduled from the original anniversary month rather than from the month of the extended audit.

18.2.2. The following audits of facility activities are required:

18.2.2.1. The conformance of reactor and plant operation to provisions contained within the technical specifications and applicable license conditions, at least once per 36 months;

18.2.2.2. The performance, training, and qualifications of the entire plant staff, at least once per 36 months;

18.2.2.3. The results of actions taken to correct deficiencies occurring in plant equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 36 months;

18.2.2.4. The performance of activities required by the quality assurance program to meet the criteria of 10 CFR50, Appendix B, at least once per 36 months;

18.2.2.5. The emergency plan and implementing procedures, in accordance with 10 CFR 50.54(t) requirements with the clarification that subsequent audit due dates are based on the month the previous audit was started;

18.2.2.6. The security plan and implementing procedures, in accordance with 10 CFR 50.54(p) and 10 CFR 73.55 requirements. ~~at least once per 24 months;~~

18.2.2.7. The fire protection program, at least once per 36 months. The audit will include the fire protection program implementation, organization, personnel, training, fire protection equipment, procedures, and program controls. The audit team will include an outside qualified fire protection consultant.

18.2.2.8. The radiological environmental monitoring program and the results thereof at least once per 36 months;

18.2.2.9. The offsite dose calculation manual (ODCM) and implementing procedures, at least once per 36 months;

18.2.2.10. The process control program (PCP) and implementing procedures for processing and packaging of radioactive waste, at least once per 36 months;

18.2.2.11. The environmental protection plan (EPP), at least once per 36 months;

18.2.2.12. Any other area of plant operation considered appropriate by the vice-president - site.

18.2.3. Audit of supplier activities shall be performed at 36 month intervals. Annual evaluation of suppliers is performed in accordance with approved procedures. As an alternate, supplier performance monitoring may be used. A maximum extension not to exceed 25% of the audit interval shall be allowed. The combined time interval for any three consecutive audit intervals should not exceed 3.25 times the specified audit interval.

18.2.4. Audit schedule changes reflecting more frequent audits are required by one or more of the following conditions:

18.2.4.1. When significant changes are made in functional areas of the QAP, such as significant reorganization or procedure revisions.

18.2.4.2. When there is evidence that the performance or reliability of safety-related items is in jeopardy due to deficiencies or nonconformances in the QAP.

18.2.4.3. When a systematic, independent assessment of QAP effectiveness is necessary.

18.2.4.4. When it is necessary to verify implementation of required corrective actions.

18.2.5. Audit reports as described above shall be forwarded to the management positions responsible for the areas audited within 30 days after completion by the auditing

organization.

18.3. ~~18.2~~ NQA-1-1994 Commitment

In establishing the independent audit program, SNC commits to compliance with NQA-1-1994, Basic Requirement 18 and Supplement 18S-1.

APPENDIX A: PLANT REVIEW BOARD

1.0 General

The plant review board (PRB) shall advise the plant manager on matters related to nuclear power plant safety for the respective plant.

In discharging its independent review responsibilities, the PRB shall keep safety considerations paramount when opposed to cost or schedule considerations. Should a voting member at a particular meeting have direct responsibility for an item under review where a conflict of such considerations is likely, that member shall be replaced (to fill the quorum) by another voting member not having such potential conflict.

RIC #11.b

2.0 Membership

The PRB shall be composed of a minimum of five members. The plant manager responsible for facility operations shall appoint, in writing, the members of PRB, including the PRB Chairperson and the Vice Chairperson(s) drawn from the committee members. A representative from the Quality Assurance organization shall be a non-voting member.

Alternate members shall be appointed in writing by the PRB Chairperson to serve on a temporary basis. Each alternate shall meet the minimum qualifications for the PRB member that the alternate is replacing, and shall have the same area of expertise as the member being replaced.

The PRB membership shall collectively possess technical knowledge and experience in the following areas:

- Nuclear power plant operations
- Nuclear engineering
- Chemistry and radiochemistry
- Instrumentation and control
- Radiological safety
- Mechanical and electrical engineering
- Administrative controls and quality assurance practices

As necessary, PRB membership may be supplemented with personnel having experience in specialty areas such as metallurgy and nondestructive testing.

RIC #11.a

3.0 Meetings

The PRB shall meet at least once per calendar month, or more frequently if convened by the PRB Chairperson.

RIC #6

A quorum of the PRB shall consist of the Chairperson or Vice Chairperson plus two voting members, or one voting member and one designated voting alternate. However, if more than a minimum number of members are present to meet the requirement for a quorum, a maximum of one third of the voting membership may be designated alternates.

For any PRB decision affecting site-wide issues, the Chairperson shall ensure appropriate representation.

4.0 Reviews

RIC #7

The PRB shall be responsible for:

(a) Review of (1) all procedures and programs required by facility Technical Specifications administrative controls and changes thereto that require a regulatory evaluation under the facility's 10 CFR 50.59 and 10 CFR 72.48 screening program, (2) changes to the quality assurance program description determined to be reductions in the commitment under the provisions of 10 CFR 50.54(a), and (3) any other proposed procedures, programs, or changes thereto affecting facility nuclear safety as determined by the plant manager.

(b) Review of all proposed changes to nuclear facility operating license prior to submittal for NRC approval.

(c) Review of all proposed facility tests and experiments that affect nuclear safety.

(d) Review of all proposed changes or modifications to systems or equipment that affect nuclear safety.

(e) Review of evaluations of proposed changes, tests, and experiments performed pursuant to 10 CFR 50.59 and 10 CFR 72.48.

(f) Performance of special reviews and investigations and reports as requested by the vice president - site, Chairperson of the PRB or the plant manager, such as indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.

(g) Investigations of all violations of Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the plant manager, the vice president - site, and the CNO.

(h) Review of all nuclear facility reportable events.

RIC #8

(i) Review of facility operations to detect potential safety hazards.

(j) Review of violations of codes, regulations, orders, license requirements, or of internal procedures or instructions having nuclear safety significance or abnormal degradation of systems designated to contain radioactive material.

(k) Review of proposed changes to the ISFSI Technical Specifications or license.

RIC #9

5.0 Authority

The PRB shall recommend to the plant manager written approval or disapproval in meeting minutes of items considered under Responsibilities (a) through (k) above.

The PRB shall render determinations in writing or meeting minutes if any item considered above, as appropriate and as provided by 10 CFR 50.59, 10 CFR 50.92, or 10 CFR 72.48, requires a license amendment or requires a significant hazards consideration determination.

The PRB shall provide written notification within 24 hours to the vice president – site of disagreement between the PRB and the plant manager. The vice president - site shall have responsibility for resolution of any such disagreement.

6.0 Records

The PRB shall maintain written minutes of each meeting and copies shall be provided to the plant manager, vice president - site and the PRB members. Records of the minutes shall be maintained in accordance with this QATR, Section 17.

RIC #13

~~APPENDIX B: INDEPENDENT REVIEW~~

~~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 review addresses matters that plant and corporate management determine warrant special attention, such as plant programs, performance trends, employee concerns, or other matters related to safe plant operations. The performance of the Plant Review Board is included in this review. The review is performed by a team consisting of personnel with experience and competence in the activities being reviewed, but independent from the organizations responsible for those activities. The review is supplemented by outside consultants or organizations as necessary to ensure the team has the requisite expertise and competence. Results are documented and reported to responsible management.~~

RIC #14

~~APPENDIX C: QUALITY ASSURANCE SURVEILLANCES~~

~~Periodic surveillances of plant activities shall be conducted to examine subjects such as plant operating characteristics and plant design and operating experience information, which may indicate areas for improving plant safety. These reviews are used to determine if the activities are being performed correctly and if human errors are being reduced as much as practical. The reviewer shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving plant safety to appropriate management. A periodic summary report shall be provided to the appropriate vice president.~~

~~Persons performing QA Surveillances will be independent of performance functions, the signoff function, and the plant management chain while performing the oversight activity.~~

~~Persons performing QA Surveillances will be sufficiently qualified to properly conduct the reviews, and shall be engineers or appropriate specialists.~~

~~QA Surveillances are performed under the direction of the senior manager responsible for quality assurance.~~

RIC #15

APPENDIX D: DEFINITIONS

SNC uses the definitions of terms as provided in Section 4 of the Introduction of NQA-1-1994 in interpreting the requirements of NQA-1-1994 and the other standards to which the QATR commits. In addition, definitions are provided for the following terms not covered in NQA-1-1994:

Administrative Controls: Rules, orders, instructions, procedures, policies, practices and designations of authority and responsibility.

Construction: As used in this QATR, Construction shall mean the performance of major rework or modification activities during the Operations Phase that are similar in nature to activities performed during the construction phase such as, but not limited to, steam generator replacement, cooling tower replacement, and ISFSI installation. This program does not cover construction phase activities.

Emergency Procedures: See Appendix E.

Experiments: Performance of plant operations carried out under controlled conditions in order to establish characteristics or values not previously known.

Maintenance and Modification Procedures: Written procedures defining the policies and practices by which structures, mechanical, electrical, and instrumentation and control systems, and components thereof, are kept in a condition of good repair or efficiency so that they are capable of performing their intended functions.

Nuclear Power Plant: Any plant using a nuclear reactor to produce electric power, process steam or space heating.

Off-normal Condition Procedures: Written procedures which specify operator actions for restoring an operating variable to its normal controlled value when it departs from its range, or to restore normal operating conditions following a perturbation. (May be called Abnormal, Off-normal or other terms conveying the same intent.)

On-site Operating Organization: On-site personnel concerned with the operation, maintenance and certain technical services.

Operating Activities: Work functions associated with normal operation and maintenance of the plant, and technical services routinely assigned to the on-site operating organization.

Operating Procedures: Written procedures defining the normal methods, means and limits of operation of the nuclear power plant, a plant system or systems, or processes, including actions to be taken by operating personnel for removal from and return to service of equipment on which maintenance is to be or has been performed.

~~**Operational Phase:** That period of time during which the principal activity is associated with normal operation of the plant. This phase of plant life is considered to begin formally with commencement of initial fuel loading, and ends with plant decommissioning.~~

~~**Review:** A deliberately critical examination, including observation of plant operation, evaluation of assessment results, procedures, certain contemplated actions, and after-the-fact investigations of abnormal conditions.~~

~~**Supervision:** Direction of personnel activities or monitoring of plant functions by an individual responsible and accountable for the activities they direct or monitor.~~

~~**Surveillance Testing:** Periodic testing to verify that safety related structures, systems, and components continue to function or are in a state of readiness to perform their functions, and to provide assurance that failures or substandard performance do not remain undetected and that the required reliability of safety related systems is maintained. Such functions include keeping parameters within normal bounds or acting to put the plant in a safe condition if they exceed normal bounds.~~

~~**System:** An integral part of nuclear power plant comprising components which may be operated or used as a separate entity to perform a specific function.~~

RIC #16

APPENDIX E: PROCEDURES

This appendix contains a description of the various types of procedures used by SNC to govern the design, operation, and maintenance of its nuclear generating plants. Each procedure shall be sufficiently detailed for a qualified individual to perform the required function without direct supervision, but need not provide a complete description of the system or plant process.

Procedure format and content may vary from one location to the other. However, procedures include the following elements as appropriate to the purpose or task to be described.

- **Title/Status**

  Each procedure is given a title descriptive of the work or subject it addresses, and includes a revision number and/or date and an approval status.

- **Purpose/Statement of Applicability/Scope**

  The purpose for which the procedure is intended is clearly stated (if not clear from the title). The systems, structures, components, processes or conditions to which the procedure applies are also clearly described.

- **References**

  Applicable references, including reference to appropriate Technical Specifications, are required. References are included within the body of the procedure when the sequence of steps requires other tasks to be performed (according to the reference) prior to or concurrent with a particular step.

- **Prerequisites/Initial Conditions**

  Prerequisites/initial conditions identify those independent actions or procedures that must be accomplished and plant conditions which must exist prior to performing the procedure. A prerequisite applicable to only a specific portion of a procedure is so identified.

- **Precautions**

  Precautions alert the user to those important measures to be used to protect equipment and personnel, including the public, or to avoid an abnormal or emergency situation during performance of the procedure. Cautionary notes applicable to specific steps are included in the main body of the procedure and are identified as such.

- **Limitations and Actions**

  Limitations on the parameters being controlled and appropriate corrective measures to return the parameter to the normal control band are specified.

- **Main Body**

  The main body of the procedure contains the step-by-step instructions in the degree of detail necessary for performing the required function or task.

- **Acceptance Criteria**

  The acceptance criteria provide the quantitative or qualitative criteria against which the success or failure (as of a test-type activity) of the step or action would be judged.

Checklists

Complex procedures utilize checklists which may be included as part of the procedure or appended to it.

Administrative Control Procedures

These include administrative procedures, directives, policies, standards, and similar documents that control the programmatic aspects of facility activities. These administrative documents ensure that the requirements of regulatory and license commitments are implemented. Several levels of administrative controls are applied ranging from those affecting the entire Company to those prepared at the implementing group level. These documents establish responsibilities, interfaces, and standard methods (rules of practice) for implementing programs. In addition to the administrative controls described throughout this QATR, instructions governing the following activities are provided:

- **Operating Orders/Procedures**

  Instructions of general and continuing applicability to the conduct of business to the plant staff are provided. Examples where these are applied include, but are not limited to, job turnover and relief, designation of confines of control room, definition of duties of operators and others, transmittal of operating data to management, filing of charts, limitations on access to certain areas and equipment, shipping and receiving instructions. Provisions are made for periodic review and updating of these documents, where appropriate.

- **Special Orders**

  Management instructions, which have short-term applicability and require dissemination, are issued to encompass special operations, housekeeping, data taking, publications and their distribution, plotting process parameters, personnel actions, or other similar matters. Provisions are made for periodic review, updating, and cancellation of these documents, where appropriate.

- **Plant Security and Visitor Control**

  Procedures or instructions are developed to supplement features and physical barriers designed to control access to the plant and, as appropriate, to vital areas within the plant. Information concerning specific design features and administrative provisions of the plant security program is confidential and thus accorded limited distribution. The security and visitor control procedures consider, for example, physical provisions, such as: fences and lighting; lock controls for doors, gates and compartments containing sensitive equipment; and provisions for traffic and access control. Administrative provisions, such as: visitor sign-in and sign-out procedures; escorts and badges for visitors; emphasis on inspection, observation and challenging of strangers by operating crews; and a program of pre-employment screening for potential employees are also considered.

- **Temporary Procedures**

  Temporary procedures may be used to direct operations during testing, refueling, maintenance, and modifications to provide guidance in unusual situations not within the scope of the normal procedures. These procedures ensure orderly and uniform operations for short periods when the plant, a system, or a component of a system is performing in a manner not covered by existing detailed procedures or has been modified or extended in such a manner that portions of existing procedures do not apply. Temporary Procedures include designation of the period of time during which they may be used and are subject to the procedure review process as applicable.

Engineering Procedures

These documents provide instructions for the preparation of engineering documents, engineering analysis, and implementation of engineering programs. This includes activities such as designs; calculations; fabrication, equipment, construction, and installation specifications; drawings; analysis and topical reports; and testing plans or procedures. They include appropriate references to industry codes and standards, design inputs, and technical requirements.

~~Installation Procedures~~

~~These documents provide instructions for the installation of components generally related to new construction and certain modification activities. They include appropriate reference to industry standards, installation specifications, design drawings, and supplier and technical manuals for the performance of activities. These documents include provisions, such as hold or witness points, for conducting and recording results of required inspections or tests. These documents may include applicable inspection and test instructions subject to the requirements for test and inspection procedures below.~~

~~System Procedures~~

~~These documents contain instructions for energizing, filling, venting, draining, starting up, shutting down, changing modes of operation, and other instructions appropriate for operations of systems related to the safety of the plant. Separate procedures may be developed for correcting off-normal conditions for those events where system complexity may lead to operator uncertainty. Appropriate procedures will also be developed for the fire protection program.~~

~~Start-up Procedures~~

~~These documents contain instructions for starting the reactor from cold or hot conditions and establishing power operation. This includes documented determination that prerequisites have been met, including confirmation that necessary instruments are operable and properly set; valves are properly aligned, necessary system procedures, tests and calibrations have been completed; and required approvals have been obtained.~~

~~Shutdown Procedures~~

~~These documents contain guidance for operations during controlled shutdown and following reactor trips, including instructions for establishing or maintaining hot shutdown/standby or cold shutdown conditions, as applicable. The major steps involved in shutting down the plant are specified, including instructions for such actions as monitoring and controlling reactivity, load reduction and cooldown rates, sequence for activating or deactivating equipment, requirements for prompt analysis for causes of reactor trips or abnormal conditions requiring unplanned controlled shutdowns, and provisions for decay heat removal.~~

~~Power Operation and Load Changing Procedures~~

~~These documents contain instructions for steady-state power operation and load changing. These type documents include, as examples, provisions for use of control rods, chemical shim, coolant flow control, or any other system available for short-term or long-term control of reactivity, making deliberate load changes, responding to unanticipated load changes, and adjusting operating parameters.~~

~~Process Monitoring Procedures~~

~~These documents contain instructions for monitoring performance of plant systems to assure that core thermal margins and coolant quality are maintained in acceptable status at all times, that integrity of fission product barriers is maintained, and that engineered safety features and emergency equipment are in a state of readiness to keep the plant in a safe condition if needed. Maximum and minimum limits for process parameters are appropriately identified. Operating procedures address the appropriate nature and frequency of this monitoring.~~

~~Fuel Handling Procedures~~

~~These documents contain instructions for core alterations, accountability of fuel and partial or complete refueling operations that include, for example, continuous monitoring of neutron flux throughout core loading, periodic data recording, audible annunciation of abnormal flux increases, and evaluation of core neutron multiplication to verify safety of loading increments. Procedures are also provided for receipt and inspection of new fuel, and for fuel movements in the spent fuel storage areas. Fuel handling procedures include prerequisites to verify the status of systems required for fuel handling and movement; inspection of replacement fuel and control rods; designation of proper tools, proper conditions for spent fuel movement, proper conditions for fuel cask loading and movement; and status of interlocks, reactor trip circuits and mode switches. These procedures provide requirements for refueling, including proper sequence, orientation and seating of fuel and components, rules for minimum operable instrumentation, actions for response to fuel damage, verification of shutdown margin, communications between the control room and the fuel handling station, independent verification of fuel and component locations, criteria for stopping fuel movements, and documentation of final fuel and component serial numbers (or other unique identifiers) and locations.~~

~~Maintenance Procedures~~

~~These documents contain instructions in sufficient detail to permit maintenance work to be performed correctly and safely, and include provisions, such as hold or witness points, for conducting and recording results of required inspections or tests. These documents may include applicable inspection or test instructions subject to the requirements for test and inspection procedures below. Appropriate referencing to other procedures, standards, specifications, or supplier manuals is provided. When not provided through other documents, instructions for equipment removal and return to service, and applicable radiation protection measures (such as protective clothing and radiation monitoring) will be included. Additional maintenance procedure requirements are addressed in NQA-1-1994, Subpart 2.18, Section 2.2, Procedures.~~

~~Radiation Control Procedures~~

~~These documents contain instructions for implementation of the radiation control program requirements necessary to meet regulatory commitments, including acquisition of data and use of equipment to perform necessary radiation surveys, measurements and evaluations for the assessment and control of radiation hazards. These procedures provide requirements for monitoring both external and internal exposures of employees, utilizing accepted techniques; routine radiation surveys of work areas; effluent and environmental monitoring in the vicinity of the plant; radiation monitoring of maintenance and special work activities, and for maintaining records demonstrating the adequacy of measures taken to control radiation exposures to employees and others.~~

~~Calibration and Test Procedures~~

~~These documents contain instructions for periodic calibration and testing of instrumentation and control systems, and for periodic calibration of measuring and test equipment used in activities affecting the quality of these systems. These documents provide for meeting surveillance requirements and for assuring measurement accuracy adequate to keep safety-related parameters within operational and safety limits.~~

~~Chemical and Radiochemical Control Procedures~~

~~These documents contain instructions for chemical and radiochemical control activities and include: the nature and frequency of sampling and analyses; instructions for maintaining coolant quality within prescribed limits; and limitations on concentrations of agents that could cause corrosive attack, foul heat transfer surfaces, or become sources of radiation hazards due to activation. These documents also provide for the control, treatment and management of radioactive wastes, and control of radioactive calibration sources.~~

~~Emergency Operating Procedures~~

~~These documents contain instructions for response to potential emergencies so that a trained operator will know in advance the expected course of events that will identify an emergency and the immediate actions that should be taken in response. Format and content of emergency procedures are based on regulatory and Owner's Group(s) guidance that identify potential emergency conditions and generally require such procedures to include a title, symptoms to aid in identification of the nature of the emergency, automatic actions to be expected from protective systems, immediate operator actions for operation of controls or confirmation of automatic actions, and subsequent operator actions to return the reactor to a normal condition or provide for a safe extended shutdown period under abnormal or emergency conditions.~~

~~Emergency Plan Implementing Procedures~~

~~These documents contain instructions for activating the Emergency Response Organization and facilities, protective action levels, organizing emergency response actions, establishing necessary communications with local, state and federal agencies, and for periodically testing the procedures, communications and alarm systems to assure they function properly. Format and content of such procedures are such that requirements of each facility's NRC approved Emergency Plan are met.~~

~~Test and Inspection Procedures~~

~~These documents provide the necessary measures to assure quality is achieved and maintained for the nuclear facilities. The instructions for tests and inspections may be included within other procedures, such as installation and maintenance procedures, but will contain the objectives, acceptance criteria, prerequisites for performing the test or inspection, limiting conditions, and appropriate instructions for performing the test or inspection, as applicable. These procedures also specify any special equipment or calibrations required to conduct the test or inspection and provide for appropriate documentation and evaluation by responsible authority to assure test or inspection requirements have been satisfied. Where necessary, hold or witness points are identified within the procedures and require appropriate approval for the work to continue beyond the designated point. These procedures provide for recording the date, identification of those performing the test or inspection, as-found condition, corrective actions performed (if any), and as-left condition, as appropriate for the subject test or inspection.~~

~~APPENDIX F~~PART IV: QUALITY ASSURANCE OF THE INDEPENDENT SPENT-FUEL STORAGE INSTALLATION

This ~~Appendix~~ Part ~~F~~ describes the administrative controls and the quality assurance (QA) program requirements applied to important-to-safety (ITS) structures, systems, and components associated with independent spent fuel storage installation (ISFSI) to assure conformance to regulatory requirements and the design bases. This program is an extension of the quality assurance program requirements described in the QATR, modified to address 10 CFR 72 Subpart G items specific to ISFSI and related support activities. This Part is applicable to all SNC nuclear plants with ISFSIs.

The QA program requirements described in the QATR are applicable to ISFSI items classified as ITS Category A and ITS Category B. Specific aspects of the QA program requirements described in the QATR are applied to ITS Category C items as specified in the individual subsections.

The following definitions are applicable to activities and items covered by this ~~Appendix~~ Part~~F~~:

ITS structures, systems, and components are those features of an ISFSI whose function is to:

- Maintain the conditions required to store spent fuel safely,
- Prevent damage to the spent fuel container during handling storage, or
- Provide reasonable assurance that spent fuel can be received, handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.

The definition of ITS safety categories below are based on NUREG/CR-6407, “Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety.”

1. Category A - ITS Category A items include structures, components, and systems whose failure could directly result in a condition adversely affecting public health and safety. The failure of a single item could cause loss of primary containment leading to release of radioactive material, loss of shielding, or unsafe geometry compromising criticality control.

2. Category B - ITS Category B items include structures, components, and systems whose failure or malfunction could indirectly result in a condition adversely affecting public health and safety. The failure of a Category B item, in conjunction with failure of an additional item, could result in an unsafe condition.

3. Category C - ITS Category C items include structures, components, and systems whose failure or malfunction would not significantly reduce the packaging effectiveness and

would not be likely to create a situation adversely affecting public health and safety.

The QA program requirements, as described in the following QATR sections and subsections, are applied to ITS Category A, B, and C items unless modified by the description below:

- Part II, Section 1 Organization

  The corporate organization established to support the operation of the plant also functions to support operation of the ISFSI.

  Additional offsite support is provided by the spent fuel storage vendor.

  Those plant organizations with responsibilities related to 10 CFR 50.59 evaluation reviews also perform the corresponding ISFSI evaluation reviews under 10 CFR 72.48.

- Part II, Section 2 QA Program

  QA program requirements are applied to the ISFSI and support structures, systems, and components using a graded approach based on the ISFSI item classification. ITS Category A, B and C are identified in the respective 10 CFR 72.212 Report, as applicable. Items identified as not important to safety in the respective 10 CFR 72.212 Report are excluded from the QA program.

  The plant organization has the same responsibilities for ITS Category A and Category B items as it does for other plant activities.

- Part II, Section 3 Design Control

  Design control measures for ITS Category A and Category B items are applied where appropriate per the controls in the QATR. Additional review concerns that are specific to the ISFSI are criticality physics, shielding, and features to facilitate decontamination.

  The designs of ITS Category C items specify procurement, inspection, and testing at a level appropriate for the importance of the function performed.

- Part II, Section 4 Procurement Document Control

  A graded approach is applied through the use of a multi-level procurement classification system based upon the end-use of each item or service. Items procured as ITS Category A or Category B are controlled as described in the QATR. ITS Category A or Category B items procured as commercial grade are controlled by the existing commercial grade dedication program. ITS Category C items are procured as appropriate for function and safety importance, and are excluded from the provisions of 10 CFR 21.

- Part II, Section 5 Instructions, Procedures, and Drawings

- Part II, Section 6 Document Control
- Part II, Section 16 Corrective Action
- Part II, Section 17 QA Records

  Records pertaining to design, fabrication, erection, testing, maintenance, and use of ITS items are maintained for the duration of the General License granted under Subpart K of 10 CFR 72 for the specific storage system.

- Part II, Section 18 Audits

  Audits are performed on a frequency not to exceed 36 months for quality activities related to the operation and maintenance of the ISFSI. A maximum extension not to exceed 25% of the audit interval shall be allowed. That is the maximum time between specific audits shall not exceed 45 months.

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The QA program requirements, as described in the following identified QATR sections, are applied to ITS Category A and B items.

- Part II, Section 7 Control of Purchased Material, Equipment, and Services.
- Part II, Section 8 Identification and Control of Materials, Parts, and Components.
- Part II, Section 9 Control of Special Processes.
- Part II, Section 10 Inspection.
- Part II, Section 11 Test Control.
- Part II, Section 12 Control of Measuring and Test Equipment.
- Part II, Section 13 Handling, Storage, and Shipping.
- Part II, Section 14 Inspection, Test, and Operating Status.
- Part II, Section 15 Nonconforming Materials, Parts, and Components.

ATTACHMENT 3 to NL-25-0067

Edwin I. Hatch Nuclear Plant, Units 1 and 2
Joseph M. Farley Nuclear Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 1 and 2
Vogtle Electric Generating Plant, Units 3 and 4

Proposed QATR Clean Typed

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

Joseph M. Farley Nuclear Plant Unit 1 Docket No. 50-348

Joseph M. Farley Nuclear Plant Unit 2 Docket No. 50-364

Edwin I. Hatch Nuclear Plant Unit 1 Docket No. 50-321

Edwin I. Hatch Nuclear Plant Unit 2 Docket No. 50-366

Alvin W. Vogtle Electric Generating Plant Unit 1 Docket No. 50-424

Alvin W. Vogtle Electric Generating Plant Unit 2 Docket No. 50-425

Alvin W. Vogtle Electric Generating Plant Unit 3 Docket No. 52-025

Alvin W. Vogtle Electric Generating Plant Unit 4 Docket No. 52-026

Joseph M. Farley Nuclear Plant Independent Spent Fuel Storage Installation Docket 72-42

Edwin I. Hatch Nuclear Plant Independent Spent Fuel Storage Installation Docket 72-36

Alvin W. Vogtle Electric Generating Plant Independent Spent Fuel Storage Installation Docket 72-1039

Joseph M. Farley Nuclear Plant Radwaste Shipping Docket 71-333

Edwin I. Hatch Nuclear Plant Radwaste Shipping Docket 71-521

Alvin W. Vogtle Electric Generating Plant Unit 1 & 2 Radwaste Shipping Docket 71-726

Alvin W. Vogtle Electric Generating Plant Unit 3 & 4 Radwaste Shipping Docket 71-0966

QUALITY ASSURANCE TOPICAL REPORT

SNC-1

Version 28.0

SOUTHERN NUCLEAR OPERATING COMPANY, INC

POLICY STATEMENT

Southern Nuclear Operating Company, Inc. (SNC) shall maintain and operate nuclear plants in a manner that will ensure the health and safety of the public and workers. Facilities shall be operated in compliance with the requirements of the Code of Federal Regulations (CFR), the applicable Nuclear Regulatory Commission (NRC) Facility Operating Licenses, and applicable laws and regulations of the state and local governments.

The SNC Quality Assurance Program (QAP) described in the SNC Quality Assurance Topical Report (QATR) and associated implementing documents provides for control of SNC activities that affect the quality of safety related nuclear plant structures, systems, and components and includes all planned and systematic activities necessary to provide adequate confidence that such structures, systems, and components will perform satisfactorily in service. The QAP may also be applied to certain equipment and activities that are not safety related, but support safe plant operations, or where other NRC guidance establishes program requirements.

The QATR is the top-level policy document that establishes the manner in which quality is to be achieved and presents SNC's overall philosophy regarding achievement and assurance of quality. Implementing documents assign more detailed responsibilities and requirements and define the organizational interfaces involved in conducting activities within the scope of the QATR. Compliance with the QATR and implementing documents is mandatory for personnel directly or indirectly associated with implementation of the SNC QAP.

Signed: Pete P Sena III

Pete P. Sena III
Chairman, President and Chief Executive Officer
Southern Nuclear Operating Company, Inc.

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

QUALITY ASSURANCE TOPICAL REPORT

SNC-1

Version 28.0

Approved by:

_____ _____
Rick Libra Date
Executive Vice President
and Chief Nuclear Officer

_____ _____
Christopher Whitfield Date
Director Nuclear Oversight

Effective Date: _____

SOUTHERN NUCLEAR OPERATING COMPANY, INC.
QUALITY ASSURANCE TOPICAL REPORT

Version Number	Revision Description Table
1.0	QATR approved and implemented 12/15/07.
2.0 – 27.0	Refer to previous versions of the QATR for complete descriptions of the changes. Previous versions can be found in Documentum.
28.0	Implements LDCR- 2025-004 which incorporates Vogtle 3&4 commitments as stated in the Nuclear Development Quality Assurance Manual (NDQAM) into the SNC Fleet Quality Assurance Topical Report (QATR). Various commitments from the previous QATR are being adopted for Vogtle 3&4. Upon implementation of LDCR-2025-004, the NDQAM will be inactivated. The QATR is being updated to include current standards for independent review and removal of Appendices for procedures, definitions and surveillances. Formatting and editorial revisions were necessary to improve readability. Due to the format changes, new section numbers and new part numbers were created. PART I Introduction • Added Vogtle 3&4 specific references to 10 CFR 52 and NURUG 800 17.5. • Refined SNC Fleet commitment to NQA-1-1994. PART II Section 1 Organization • Updated SNC's organizational structure to streamline descriptions and to include Vogtle 3&4. • Added Independent Oversight subsection to provide the description of the organizational relationship of the independent review function to the SNC organization. PART II Section 2 Quality Assurance Program • Added Vogtle 3&4 specific commitments to specific program controls applied to non-safety related Systems, Structures and Components (SSCs). • Added a new Independent Review subsection implements Option 1 of NEI 06-14A but incorporating the knowledge and experience from QATR for the Fleet.

	• For Vogtle 3&4, the commitment for the PRB to review the adequacy of the internal audit program every 24 months is removed consistent with NRC Safety Evaluation ML050700416. PART II Section 3 Design Control • Added Vogtle 3&4 specific commitments for computer application and digital equipment software. • Added Vogtle 3&4 specific commitments for setpoint control. PART II Section 4 Procurement Document Control • Added Vogtle 3&4 clarification and exception to NQA-1 Supplement 4S-1 Section 3 and made the clarification and exception applicable to the entire Fleet. • Added clarification for commercial grade items procurement documents. • Deleted the existing NQA-1-1994 clarification and exception for commercial grade calibration and/or testing as duplicate to Part II Section 7.3. PART II Section 5 Instructions, Procedures, And Drawings • Created subsection titled “Temporary Procedure Control” with a statement clarifying the designation of the period of time during which temporary procedures may be used. • Added new subsection titled “Procedure Content” to reference the introduction to Part II of NQA-1-1994 and to state that procedures governing tests, inspections, operational activities, and maintenance will include as applicable, initial conditions and prerequisites for the performance of the activity. • Delete specific reference Regulatory Guide (RG) 1.33 as redundant to QATR Part III, Regulatory Commitments for Regulatory Guide 1.33 description. Refence to QATR Appendix E is also deleted as Appendix E is being deleted by this change. PART II Section 6 Document Control • Added Vogtle 3&4 commitment regarding identifying and superseding documents and made the commitment applicable to the entire Fleet. PART II Section 7 Control Of Purchased Material, Equipment, and Services • Added Vogtle 3&4 commitment regarding contracts or contract modifications and made the commitment applicable to the entire Fleet. • Added Vogtle 3&4 commitment regarding initial audits of suppliers and made the commitment applicable to the entire Fleet.

	• Relocated commitments regarding calibration services from Part II Section 4.3 • Added Vogtle 3&4 commitment regarding NDE personnel qualification certification, and made the commitment applicable to the entire Fleet. • Added Vogtle 3&4 commitment regarding special quality verification requirements for commercial grade items, and made the commitment applicable to the entire Fleet. • Added Vogtle 3&4 commitment regarding 10 CFR 21 reporting responsibility, and made the commitment applicable to the entire Fleet. PART II Section 8 Identification And Control Of Materials, Parts, and Components • Various format, clarification and editorial changes. PART II Section 9 Control Of Special Processes • Various format and editorial changes. PART II Section 10 Inspection • Added Vogtle 3&4 NQA-1-1994 clarification and exception regarding structures with design based on American Concrete Institute ACI-349. PART II Section 11 Test Control • Added a statement regarding test results, data, and testing personnel. • Various format and editorial changes. PART II Section 12 Control Of Measuring and Test Equipment • Added a statement regarding the location of requirement of commercial grade services within the QATR • Various format and editorial changes. PART II Section 13 Handling, Storage, And Shipping • Clarified a requirement that only applies for Farley, Hatch and Vogtle 1&2. PART II Section 14 Inspection, Test, and Operating Status • Various format and editorial changes. PART II Section 15 Nonconforming Materials, Parts, or Components • Deleted commitments regarding the nonconformance trends and analyses to be submitted to the site vice president. PART II Section 16 Corrective Action • Various format and editorial changes.

	PART II Section 17 Quality Assurance Records • Added Vogtle 3&4 commitment regarding records storage, and made the commitment applicable to the entire Fleet. PART II Section 18 Audits • Remove commitment to perform surveillances as describe in Appendix C which is being deleted. • Clarified the requirements for subsequent audit due dates applicable to emergency plan and implementing procedures. • Clarified the requirement for security plan audits. • For Vogtle 3&4, fire protection audit periodicity is being changed to conform with the existing 36 month frequency previously approved for the SNC fleet. PART III Regulatory Commitments • Added Vogtle 3&4 only commitments. • Deleted Appendix A, Appendix B, Appendix C, Appendix D, and Appendix E PART IV Quality Assurance of the Independent Spent-Fuel Storage Installation • Changed Appendix F to QATR Part IV. • Added an audit extension allowance consistent with the approved SNC 10 CFR 50 Appendix B QA program PART V Non-Safety Related SSCs - Significant Contributors to Plant Safety (Vogtle 3&4 Only) • Added Vogtle 3&4 specific commitment for specific program controls are applied to non-safety related SSCs.

SOUTHERN NUCLEAR OPERATING COMPANY, INC.
QUALITY ASSURANCE TOPICAL REPORT

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SOUTHERN NUCLEAR OPERATING COMPANY, INC.
QUALITY ASSURANCE TOPICAL REPORT

PART I INTRODUCTION

1.0 General

1.1. This Southern Nuclear Operating Company, Inc., (SNC) Quality Assurance Topical Report (QATR) is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for plants operated by SNC.

1.2. The QATR describes the methods and establishes quality assurance program and administrative control requirements that meet 10 CFR 50, Appendix B and 10 CFR 52 (Vogtle 3&4 only). The QATR is organized and formatted to conform to NRC Standard Review Plan (NUREG 0800) Sections 17.1, 17.2 (Revision 2 – July 1981) and 17.5 (Revision 0 – March 2007) and is based on the requirements of ASME NQA-1-1994, "Quality Assurance Requirements for Nuclear Facility Applications," Parts I and II, except as specified in this QATR.

1.3. The Quality Assurance Program (QAP) is defined by the NRC approved regulatory document that describes the quality assurance program elements (the QATR), along with the associated corporate, fleet, and site-specific implementing documents.

1.4. Corporate Policies and Guidelines establish high level responsibilities and authority for carrying out important administrative functions which are outside the scope of the QAP. Nuclear fleet wide procedures establish practices for certain activities which are common to all SNC organizations performing those activities such that the activity is controlled and carried out in a manner that meets QAP requirements.

1.5. Site or organization specific procedures establish detailed implementation requirements and methods which may be used to implement Corporate Policies and Guidelines and nuclear fleet wide procedures or be unique to particular functions or work activities.

2.0 Scope / Applicability

2.1 This QATR applies to activities affecting the quality and performance of safety-related structures, systems, and components.

2.2. Safety related systems, structures, and components, under the control of the QATR, are identified for each plant. In addition, systems, structures, and components important to safety, associated with the Independent Spent Fuel Storage Installation (ISFSI), are identified for each plant (if applicable). The technical aspects of these items are considered when determining program applicability, including, as appropriate, the item's design safety function. The QAP may be applied to certain activities where regulations other than 10 CFR 50 and 10 CFR 52, as applicable, establish QA program requirements

for activities within their scope. Thus, selected elements of this QATR are applied to the "important to safety" activities of radioactive waste shipping and independent spent fuel storage, as defined in 10 CFR 71 Subpart H and 10 CFR 72 Subpart G, respectively, as allowed, by 10 CFR 71.101.f and 10 CFR 72.140.d. Accordingly, application of the elements of this QATR for ISFSI is as defined in the respective 10 CFR 72.212 report for each site, as applicable.

2.3. Plant Farley Units 1&2, Plant Hatch Units 1&2, and Plant Vogtle Units 1&2 have been licensed to use 10 CFR 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems, and Components for Nuclear Power Reactors." The applicability and scope of this regulation is as specified in 10 CFR 50.69. Within the provisions of this voluntary regulation, alternative approaches are allowed for establishing the requirements for treatment of a structure, system, or component, using a risk informed method of categorization according to safety significance. For structures, systems, or components categorized as Safety-Related, Low Safety Significant (LSS) (RISC-3) in accordance with 10 CFR 50.69, alternative compliance to 10 CFR 50 Appendix B is allowed.

2.4. The policy of SNC is to assure a high degree of availability and reliability of its nuclear plants while ensuring the health and safety of its workers and the public. To this end, selected elements of the Quality Assurance Program are also applied to certain equipment and activities that are not safety related or important to safety, but support safe, economic, and reliable plant operations, or where other NRC guidance establishes program requirements. These include, but not limited to, emergency preparedness, security, radiation protection, and fire protection. Implementing documents establish program element applicability.

3.0 Responsibilities

3.1. SNC personnel engaged in activities described in this QATR shall comply with the requirements of the Quality Assurance Program. Contractors, or other organizations supporting SNC, are required to comply with the QAP established by this QATR, or with their own programs determined by SNC to include sufficient controls to meet the applicable requirements of 10 CFR 50, Appendix B. All facilities shall be operated in compliance with the applicable Code of Federal Regulations, NRC Operating Licenses, and the applicable laws and regulations of the state and local governments in which the facility is located.

3.2. Quality assurance personnel have the authority to stop work actions or plant operations when they perceive that work is not progressing in a manner that meets the quality assurance program.

4.0 Interfaces with Owners

Operating service agreements exist between Southern Nuclear Operating Company, Inc. and the nuclear power plant owner organizations to establish responsibilities and authorities, consistent with each facility's NRC Operating License, for the operation and maintenance of said facilities. These agreements designate SNC as the exclusive licensee authorized to

operate Joseph M. Farley Nuclear Plant, Edwin I. Hatch Nuclear Plant, and Alvin W. Vogtle Electric Generating Plant in accordance with the terms and conditions of their respective licenses.

5.0 NQA-1-1994 Commitments

5.1. QATR revisions are reviewed by SNC Senior Management and approved by the SNC Chief Nuclear Officer. Changes to this QATR will be governed by and made in compliance with 10 CFR 50.54(a).

5.2. 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.

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PART II QUALITY ASSURANCE PROGRAM DETAILS

SECTION 1 ORGANIZATION

1.1 General

1.1.1 This Section describes the SNC organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAP implementation.

1.1.2 The organizational structure includes corporate functions and onsite functions for each plant. The applicable site Final Safety Analysis Report (FSAR) and implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of this QATR.

1.1.3 As the top-level document describing QA program requirements, generic titles are used in the QATR to describe required elements and organization structure, as necessary to maintain appropriate independence of the QA organization and are not intended to reflect specific titles within the organization. Specific titles identifying individuals responsible for implementation of QA program elements are provided in the conduct of operations procedures for the applicable department. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

1.2 Organizational Structure (Design and Construction)

Initial Design and Construction phases of the Farley Nuclear Plant, the Hatch Nuclear Plant, and the Vogtle Electric Generating Plant (collectively “Plants”) are complete. This program does not cover Construction Phase activities. However, major rework or modification activities may occur during the Operations Phase that are similar in nature to activities performed during the Construction Phase such as, but not limited to, steam generator replacement, cooling tower replacement, and ISFSI installation.

1.3 Organizational Structure (Operations Phase)

This section describes the SNC nuclear operations organizational structure, functional responsibilities, levels of authority and important interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes corporate and onsite functions and interface responsibilities for multiple organizations that perform quality-related functions. Implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of the QAPD. Specific titles identifying certain positions responsible for implementation of QA program elements are also provided in the conduct of operations procedures for the applicable department.

The nuclear operations organization, under the direction of the president and CEO, has direct

responsibility for the operation and maintenance of the Plants.

The structure of the nuclear operations organization is described in the following paragraphs.

1.3.1 Corporate Organization

This Section provides information concerning functions, responsibilities, and organizational structure of the corporate staff responsible for the management and technical support of the Plants. These corporate organizations provide support for operations and maintenance of the plants including general management, licensing, design configuration, design basis maintenance, procurement, testing, quality assurance, emergency planning, and security of the plant during the operations phase of the Plants. SNC management is responsible for directing activities of the Plant organizations, as well as the corporate support organizations. The corporate organizations function in a support role to the Plants.

1.3.1.1 President and CEO

The SNC President and Chief Executive Officer (president/CEO) is responsible for all aspects of operation of Southern Company's nuclear plants, including employment decisions. The president/CEO is also responsible for all technical and administrative support activities provided by SNC and non-affiliated contractors. The President/CEO directs the chief nuclear officer/executive vice president, senior vice president - technical support, vice president - general counsel, and director - finance in fulfillment of their responsibilities. The president/CEO provides day to day technical directions to the vice president human resources. The president/CEO reports to the SNC Board of Directors with respect to all matters.

1.3.1.1.1 Chief Nuclear Officer / Executive Vice President

The chief nuclear officer/executive vice president (CNO/EVP) is responsible for the safe, reliable, and efficient operation of the Joseph M. Farley Nuclear Plant (FNP), the Edwin I. Hatch Nuclear Plant (HNP), and the Alvin W. Vogtle Electric Generating Plant (VEGP). The chief nuclear officer directs the vice president – sites, the vice president – engineering and the senior manager responsible for governance and oversight. The chief nuclear officer has overall responsibility for establishing quality policy and implementation of the quality program. The authority to accomplish quality assurance functions is delegated to the staff as necessary to fulfill the identified responsibilities. The senior manager responsible for nuclear oversight will have the authority and organizational freedom, including sufficient independence from cost and schedule to escalate matters directly to the CNO/EVP if needed to ensure that quality concerns and/or nuclear safety considerations are addressed.

1.3.1.1.1.1. Senior manager responsible for governance and oversight

The senior manager responsible for governance and oversight reports to the chief nuclear officer. This individual is responsible for identifying and resolving fleet issues and utilizing trends, operating experience, and industry best practices to improve fleet performance. The senior manager responsible for governance and oversight directs the senior managers responsible for fleet operations, fleet maintenance, fleet environmental and chemistry, fleet

radiation protection, fleet industrial safety, fleet training, fleet engineering, and fleet organizational effectiveness (which also oversees the corrective action program). In addition, the senior manager responsible for governance and oversight is responsible for ensuring governance and oversight for information technology.

1.3.1.1.1.2. Vice President – Engineering

The vice president – engineering is responsible for providing plant specific and generic engineering support in the areas of nuclear fuels and analysis, design and procurement engineering, plant support, and project management for improvement projects. The vice president – engineering is responsible for assuring that specialized engineering expertise is available as needed for normal operations and emergency situations, ensuring the fleet is prepared to respond safely to a severe accident, assessing nuclear industry issues through contact with owners and ad hoc groups, nuclear utility interfaces, assuring that documentation and records of design activities are properly maintained. The vice president – engineering directs the senior managers responsible for central design engineering, fleet plant support, and fleet nuclear fuel.

1.3.1.1.2 Senior Vice President – Technical Support

The senior vice president – technical support reports to the President/CEO and is responsible for developing the overall licensing strategy for the operating fleet and managing relationships with Nuclear Regulatory Commission (NRC) and other governmental authorities. The senior vice president – technical support is also responsible for overall execution of refueling outages, major capital projects, nuclear development efforts for Southern Nuclear. In addition, the senior vice president – technical support is responsible for Southern Nuclear Services including execution of the Pooled Inventory Management Program, the national Strategic Alliance for FLEX Emergency Response (SAFER) response centers and consulting efforts on AP1000 experience. The senior vice president – technical support directs the vice president - regulatory affairs, the senior manager responsible for fleet outage services, the senior manager responsible for fleet projects, and the external affairs and communications director.

1.3.1.1.2.1. Vice President – Regulatory Affairs

The vice president – regulatory affairs is responsible for licensing and interface activities with the Nuclear Regulatory Commission for the fleet. The vice president – regulatory affairs provides organizational support and ensures prompt and proper disposition of regulatory issues, develops regulatory positions and advises senior management on priorities and activities affecting regulatory issues at the nuclear sites. Other responsibilities include developing policies and standardized processes and procedures for the maintenance of the licensing basis, the preparation of submittals to the NRC and other regulatory organizations, and the dissemination of regulatory and operational experience information, environmental and chemistry, and security. The vice president – regulatory affairs directs the fleet regulatory affairs director, senior manager responsible for security programs, senior manager responsible for fleet emergency preparedness, and the senior manager responsible for risk informed engineering which also oversees safety analysis engineering.

1.3.1.1.2.2. Senior manager responsible for fleet outage services

The senior manager responsible for fleet outage services is responsible for managing members of the outside alliance partners as they are involved with outage preparation, outage closeout, and program assessment activities pertaining to fuel handling including dry storage. The senior manager responsible for fleet outage services is also responsible for establishing policy level guidance and procedures; for providing oversight to plant staffs regarding outage preparation and dry storage activities; establishes the common approach for the execution of refueling outages; ensuring refueling and turbine outage activities are integrated and supported; evaluates programs for conformance to industry best standards; and drives performance improvements where needed.

1.3.1.1.2.3. Senior manager responsible for fleet projects

The senior manager responsible for fleet projects is responsible for governance, oversight, support and performance for major project management at the site and fleet level. The senior manager responsible for fleet projects directs the project management organization manager, the manager of fleet projects, and the senior managers responsible for site projects.

1.3.1.1.3 Vice President - General Counsel

The vice president and general council reports directly to the President/CEO. The vice president and general counsel is responsible for compliance, employee concerns, and the Quality Assurance Program (QAP) oversight for SNC. The vice president and general counsel directs the senior manager responsible for compliance of nuclear programs.

1.3.1.1.3.1. Senior manager responsible for compliance of nuclear programs

The senior manager responsible for compliance of nuclear programs reports to the senior manager of general counsel and directs the senior manager responsible for nuclear oversight.

1.3.1.1.3.1.1. Senior manager responsible for nuclear oversight

The senior manager responsible for nuclear oversight is responsible for SNC nuclear oversight activities using staffs located at corporate headquarters and at each of the operating plants. This includes ensuring implementation of the QA program in accordance with regulatory commitments. The nuclear oversight organization provides comprehensive independent audits of safety-related activities to verify that they are in compliance with the quality assurance program. The senior manager responsible for nuclear oversight will have the authority and organizational freedom, including sufficient independence from cost and schedule to escalate matters directly to the CNO/EVP if needed to ensure that quality concerns and/or nuclear safety considerations are addressed.

1.3.1.1.4 Senior manager responsible for supply chain

The senior manager responsible for supply chain reports directly to the vice president – supply chain management – Southern Company and is responsible for the areas of procurement, procurement document control, development of sources of supply including the selection of suppliers to be awarded purchase orders or contracts, and materials management activities.

1.3.2 Standard Plant Organization

The onsite operating organization shall provide, as part of the normal duties of plant supervisory personnel, timely and continuing monitoring of operating activities to assist the vice president – site in keeping abreast of general plant conditions and to verify that the day-to-day operating activities are conducted safely and in accordance with applicable administrative controls. The onsite Operating organization shall include one or more individuals knowledgeable in the following fields: nuclear power plant operation; nuclear power plant, mechanical, electrical and electronic systems; nuclear engineering; chemistry and radiochemistry; radiation protection; and quality assurance.

1.3.1.2 Vice President – Site

The vice president – site for each Plant reports to the CNO/EVP regarding operation issues and support matters, and is responsible for operation, maintenance, and technical support of the respective Plant over which they have authority. A vice president – site directs the plant manager, the senior manager responsible for engineering, the regulatory affairs manager, the senior manager responsible for security, and the senior manager responsible for training for each respective plant. The vice president – site has overall responsibility for the execution of the administrative controls and quality assurance program at the respective plant to assure nuclear safety for that plant.

1.3.1.2.1 Plant manager

The plant manager (PM) is responsible for direct management of the plant, including operations, maintenance, refueling, industrial safety, and technical and administrative activities. The PM is responsible for:

A. Compliance with the requirements of the operating license, Technical Specifications, and quality assurance program, and

B. Approval, prior to implementation, of each proposed test, experiment, or modification to systems or equipment that impact nuclear safety.

The PM directs senior managers responsible for maintenance, operations, environmental and chemistry, radiation protection, and outages.

SNC plants maintain a plant review board (PRB) at each plant to review overall plant operations and advise plant site management on matters related to nuclear safety Part II, Section 2 provides a detailed description of these PRBs.

1.3.1.2.2 Senior manager responsible for engineering

The senior manager responsible for engineering reports directly to the vice president – site. The senior manager responsible for engineering serves as the engineering lead for the respective site and is responsible for plant support (including equipment reliability, engineering programs, quality control, systems engineering), site design engineering, reactor engineering, and plant modifications. The senior manager responsible for engineering is responsible for standardization, long-term resource planning, and promoting best practices.

1.3.1.2.3 Senior manager responsible for training

The senior manager responsible for training reports directly to the vice president – site and is responsible for developing and maintaining a training / retraining program for plant personnel that meets requirements for INPO accreditation and that meets the respective site-specific security plan and emergency response plans; and maintaining the training simulator. Implementation of initial and continuing non-accreditation training programs is the responsibility of applicable non-licensed departmental managers and supervisors.

1.4 Independent Oversight

Independent Oversight is implemented through Nuclear Oversight, the quality verification process and the Plant Review Board. Personnel performing independent oversight have direct access to responsible management at a level where appropriate action can be affected to address issues related to quality and report to a management level such that required authority and organizational freedom are provided, including sufficient independence from cost and schedule considerations.

1.4.1 A senior manager responsible for nuclear oversight reports to senior manager responsible for compliance of nuclear programs and is responsible to ensure the quality assurance program is established, maintained, and effectively executed throughout the Nuclear Fleet. The senior manager responsible for nuclear oversight will have the authority and organizational freedom, including sufficient independence from cost and schedule to escalate matters directly to the CNO/EVP if needed to ensure that quality concerns and/or nuclear safety considerations are addressed.

1.4.2 Quality verifications are performed by individuals with responsibility to the site Engineering organization and as described in section 10 of this QATR.

1.4.3 Plant Review Board

The independent review function is implemented through the Plant Review Board (PRB) is described in section 2.5 of this QATR and results reported to the Plant Manager.

1.5 NQA-1-1994 Commitment

In establishing its organizational structure, SNC commits to compliance with NQA-1-1994, Part II, Basic Requirement 1 and Supplement 1S-1.

SECTION 2 QUALITY ASSURANCE PROGRAM

2.1 General

SNC has established the necessary measures and governing procedures to implement the QAP as described in the QATR. SNC is committed to meeting this QAP in all aspects of work that are important to the safety and reliability of the nuclear plants as described and to the extent delineated in this QATR. Further, SNC ensures through the systematic process described herein that its suppliers of safety related equipment or services meet the applicable requirements of 10 CFR 50, Appendix B. Senior management is regularly apprised of audit results evaluating the adequacy of implementation of the QAP through the audit functions described in the Audit Section of this QATR.

As described in Part V (Vogtle 3&4 only), specific program controls are applied to non-safety related SSCs, for which 10 CFR 50, Appendix B is not applicable, that are significant contributors to plant safety. The specific program controls consistent with applicable sections of the QATR are applied to those items in a selected manner, targeted at those characteristics or critical attributes that render the SSC a significant contributor to plant safety.

2.2 Responsibilities

2.2.1 Personnel who work directly or indirectly for SNC are responsible for the achievement of acceptable quality in the work covered by this QATR. This includes those activities delineated in Part I, Section 1.1 of this QATR.

2.2.2 SNC personnel performing verification activities are responsible for verifying the achievement of acceptable quality. Activities governed by the QAP are performed as directed by documented instructions, procedures and drawings that are of a detail appropriate for the activity's complexity and effect on safety.

2.2.3 Instructions, procedures and drawings specify quantitative or qualitative acceptance criteria as applicable or appropriate for the activity, and verification is against these criteria. Provisions are established to designate or identify the proper documents to be used in an activity, and to ascertain that such documents are being used.

2.2.4 The senior manager responsible for quality assurance is responsible to verify that processes and procedures comply with QATR and other applicable requirements, that such processes or procedures are implemented, and that management appropriately ensures compliance.

2.3 Delegation of Work

2.3.1 SNC retains and exercises the responsibility for the scope and implementation of an effective QAP.

2.3.2 Positions identified in the Organization Section of this QATR may delegate all or part of the activities of planning, establishing, and implementing the program for which

they are responsible to others, but retain the responsibility for the program's effectiveness. Decisions affecting safety are made at the level appropriate for its nature and effect, and with any necessary technical advice or review.

2.3.3 Delegated responsibilities may also be performed under a supplier's or principal contractor's quality assurance program, provided that the supplier or principal contractor has been approved as a supplier in accordance with the QATR. Periodic audits and assessments of supplier QA programs are performed in accordance with Section 18 of this QATR to assure compliance with the supplier's or principal contractor's quality assurance program and implementing procedures. In addition, routine interfaces with project personnel assure that quality expectations are met.

2.4 Personnel Qualifications

2.4.1 Personnel assigned to implement elements of the QAP shall be capable of performing their assigned tasks. To this end SNC establishes and maintains formal indoctrination and training programs for personnel performing, verifying, or managing activities within the scope of the QAP to assure that suitable proficiency is achieved and maintained.

2.4.2 Plant and support staff minimum qualification requirements are as delineated in each site's Technical Specifications. Other qualification requirements may be established but will not reduce those required by Technical Specifications. Sufficient managerial depth is provided to cover absences of incumbents.

2.4.3 When required by code, regulation, or standard, specific qualification and selection of personnel is conducted in accordance with those requirements as established in the applicable SNC procedures. Indoctrination includes the administrative and technical objectives, requirements of the applicable codes and standards, and the QAP elements to be employed.

2.4.4 Training for positions identified in 10 CFR 50.120 is accomplished according to programs accredited by the National Nuclear Accrediting Board of the National Academy of Nuclear Training that implement a systematic approach to training. Records of personnel training and qualification are maintained.

2.4.5 The minimum qualifications of the senior manager responsible for quality assurance are that the manager holds an engineering degree, or a degree in a related science, and has a minimum of five years' experience in the areas of engineering, field construction, or plant operations. Two of these five years must involve working under a nuclear quality assurance program.

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2.5 Independent Review

2.5.1 Activities occurring during the operational phase shall be independently reviewed on a periodic basis. The independent review function, implemented through the Plant Review Board (PRB), performs the following:

2.5.1.1 The PRB will review proposed changes to the facility that are determined to adversely affect nuclear safety or impact Technical Specifications.

2.5.1.2 Reviews proposed tests and experiments not described in the SAR. Changes to proposed tests and experiments not described in the SAR that do require a technical specification change or license amendment must be reviewed by the PRB prior to NRC submittal and implementation.

2.5.1.3 Reviews proposed technical specification changes and license amendments relating to nuclear safety prior to NRC submittal and implementation, except in those cases where the change is identical to a previously approved change.

2.5.1.4 Reviews violations, deviations, and events that are required to be reported to the NRC. This review includes the results of investigations and recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.

2.5.1.5 Reviews any matter related to nuclear safety that is requested by the Site Vice President, or any PRB member.

2.5.1.6 Reviews corrective actions for significant conditions adverse to quality.

2.5.2 The PRB functions as an independent review body. In discharging its review responsibilities, the PRB keeps safety considerations paramount when opposed to cost or schedule considerations. One or more departments may collectively perform this function.

2.5.2.1 The review is performed by a team consisting of personnel with experience and competence in the activities being reviewed, but independent from cost and schedule considerations and from the organizations responsible for those activities. The PRB chairman and the members of the PRB shall collectively possess technical knowledge and experience in the following areas:

- Nuclear power plant operations
- Nuclear engineering
- Chemistry and radiochemistry

- Instrumentation and control
- Radiological safety
- Mechanical and electrical engineering
- Administrative controls and quality assurance practices

2.5.2.2 PRB reviews are supplemented as follows:

2.5.2.2.1 A qualified person, independent of the preparer, reviews proposed changes in the procedures as described in the UFSAR prior to implementation of the change to determine if a technical specification change or NRC approval is required.

2.5.2.2.2 Audits of selected changes in the procedures described in the UFSAR are performed to verify that procedure reviews and revision controls are effectively implemented.

2.5.2.2.3 Competent individual(s) or group(s) other than those who performed the original design but who may be from the same organization verify that changes to the facility do not result in a loss of adequate design or safety margins.

2.5.3 The results of independent review body reviews of matters involving the safe operation of the facility are periodically independently reviewed. This review is intended to support management in identifying and resolving issues potentially affecting safe plant operation. This review supplements the existing corrective action programs and audits.

2.5.3.1 The review is supplemented by outside consultants or organizations as necessary to ensure the team has the requisite expertise and competence.

2.5.3.2 Results are documented and reported to responsible management.

2.5.3.3 Management periodically considers issues they determine warrant special attention, such as deficient plant programs, declining performance trends, employee concerns, or other issues related to safe plant operations and determine what issues warrant the review.

2.5.3.4 Management determines the schedule and scope of review and the composition of the team performing the review.

2.6 NQA-1-1994 Commitment

2.6.1 In establishing qualification and training programs, SNC commits to compliance with NQA-1-1994, Basic Requirement 2 and Supplements 2S-1, 2S-2, 2S-3 and 2S-4, with the following clarifications and exceptions:

2.6.1.1 NQA-1-1994, Supplement 2S-1

- SNC Supplement 2S-1 will include use of the guidance provided in Appendix 2A-1 of NQA-1 1994 Part III, the same as if it were part of the Supplement. The following two alternatives may be applied to the implementation of this Supplement and Appendix:

  - In lieu of being certified as Level I, II, or III in accordance with NQA-1-1994, personnel performing operations phase independent quality verification inspections, examinations, measurements, or tests of material, products, or activities will be required to possess qualifications equal to or better than those required for performing the task being verified; and the verification is within the skills of these personnel and/or is addressed by procedures. These individuals will not be responsible for the planning of quality verification inspections and tests (i.e., establishing hold points and acceptance criteria in procedures, and determine who will be responsible for performing the inspections), evaluating inspection training programs, nor certifying inspection personnel.

  - A qualified engineer may be used to plan inspections, evaluate the capabilities of an inspector, or evaluate the training program for inspectors. For the purpose of these functions, a qualified engineer is one who has a baccalaureate in engineering in a discipline related to the inspection activity (such as electrical, mechanical, civil) and has a minimum of five years engineering work experience with at least two years of this experience related to nuclear facilities.

2.6.1.2 NQA-1-1994, Supplement 2S-2

- In lieu of Supplement 2S-2, for qualification of nondestructive examination personnel, SNC will follow the applicable standard cited in the version(s) of Section III and Section XI of the ASME Boiler and Pressure Vessel Code approved by the NRC for use at SNC sites.

2.6.1.3 NQA-1-1994, Supplement 2S-3

- The requirement that prospective Lead Auditors have participated in a minimum of five (5) audits in the previous three (3) years is replaced by the following, "The prospective lead auditor shall demonstrate his/her ability to properly implement the audit process, as implemented by SNC, to effectively lead an audit team, and to effectively organize and report results, including

participation in at least one nuclear audit within the year preceding the date of qualification."

SECTION 3 DESIGN CONTROL

3.1 General

3.1.1 SNC has established and implements a process to control the design, design changes and temporary modifications (e.g., temporary bypass lines, electrical jumpers and lifted wires, and temporary setpoints) of items that are subject to the provisions of this QATR.

3.1.2 The design process includes provisions to control design inputs, outputs, changes, interfaces, records and organizational interfaces. These provisions assure that design inputs (such as design bases and the performance, regulatory, quality, and quality verification requirements) are correctly translated into design outputs (such as analyses, specifications, drawings, procedures, and instructions) so that the final design output can be related to the design input in sufficient detail to permit verification.

3.1.3 Design change processes and the division of responsibilities for design related activities are endorsed by the SNC design authority. The design control program includes interface controls necessary to control the development, verification, approval, release, status, distribution and revision of design inputs and outputs. Design changes and disposition of nonconforming items as “use as is” or “repair” are reviewed and approved by the SNC design organization or by other organizations so authorized by the design authority.

3.1.4 In addition, temporary design changes (temporary modifications), such as temporary bypass lines, electrical jumpers and lifted wires, and temporary trip-point settings, are controlled by procedures that include requirements for appropriate installation and removal verifications and status tracking.

3.1.5 Design documents are reviewed by individuals knowledgeable in QA to ensure the documents contain the necessary QA requirements.

3.2 Design Verification

3.2.1 SNC design processes provide for design verification to ensure that items and activities subject to the provisions of this QATR are suitable for their intended application, consistent with their effect on safety. Design changes are subjected to these controls, which include verification measures commensurate with those applied to original plant design.

3.2.2 Design verifications are performed by competent individuals or groups other than those who performed the original design but who may be from the same organization. The verifier shall not have taken part in the selection of design inputs, the selection of design considerations, or the selection of a singular design approach, as applicable. This verification may be performed by the originator’s supervisor provided the

supervisor did not specify a singular design approach, rule out certain design considerations, did not establish the design inputs used in the design, or if the supervisor is the only individual in the organization competent to perform the verification. If the verification is performed by the originator's supervisor, the justification of the need is documented and approved in advance by management.

3.2.3 The extent of the design verification required is a function of the importance to safety of the item under consideration, the complexity of the design, the degree of standardization, the state-of-the-art, and the similarity with previously proven designs. This includes design inputs, design outputs and design changes. Design verification procedures are established and implemented to assure that an appropriate verification method is used, the appropriate design parameters to be verified are chosen, the acceptance criteria are identified, and the verification is satisfactorily accomplished and documented. Verification methods may include, but are not limited to, design reviews, alternative calculations and qualification testing. Testing used to verify the acceptability of a specific design feature demonstrates acceptable performance under conditions that simulate the most adverse design conditions expected for item's intended use.

3.2.4 SNC normally completes design verification activities before the design outputs are used by other organizations for design work, and before they are used to support other activities such as procurement, manufacture or construction. When such timing cannot be achieved, the design verification is completed before relying on the item to perform its intended design or safety function.

3.3 Design Records

3.3.1 SNC maintains records sufficient to provide evidence that the design was properly accomplished. These records include the final design output and any revisions thereto, as well as record of the important design steps (e.g., calculations, analyses and computer programs) and the sources of input that support the final output.

3.3.2 Plant design drawings reflect the properly reviewed and approved configuration of the plant.

3.4 Computer Application and Digital Equipment Software (Vogtle 3&4 Only)

3.4.1 The QAP governs the development, procurement, testing, maintenance, and use of computer application and digital equipment software when used in safety-related applications and designated non safety-related applications.

3.4.2 SNC and suppliers are responsible for developing, approving, and issuing procedures, as necessary, to control the use of such computer application and digital equipment software. The procedures require that the application software be assigned a proper quality classification and that the associated quality requirements be consistent with this classification.

3.4.3 Each application software and revision there to is documented and approved by designated SNC and supplier management and listed in a software register for identifying active quality related applications. This QAP is also applicable to the administrative functions associated with the maintenance and security of computer hardware where such functions are considered essential in order to comply with other QAP requirements such as QA records.

3.5 Setpoint Control (Vogtle 3&4 Only)

Instrument and equipment setpoints that could affect nuclear safety shall be controlled in accordance with written instructions. As a minimum, these written instructions shall:

3.5.1 Identify responsibilities and processes for reviewing, approving, and revising setpoints and setpoint changes originally supplied by the Design Certification holder, the A/E, and the plant's technical staff.

3.5.2 Ensure that setpoints and setpoint changes are consistent with design and accident analysis requirements and assumptions.

3.5.3 Provide for documentation of setpoints, including those determined operationally.

3.5.4 Provide for access to necessary setpoint information for personnel who write or revise plant procedures, operate or maintain plant equipment, develop or revise design documents, or develop or revise accident analyses.

3.6 NQA-1-1994 Commitment

In establishing its program for design control and verification, SNC commits to compliance with NQA-1-1994, Basic Requirement 3, and Supplement 3S-1.

Vogtle 3&4 only, SNC commits to the subsurface investigations requirements contained in Subpart 2.20 and the standards for computer software contained in Subpart 2.7

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SECTION 4 PROCUREMENT DOCUMENT CONTROL

4.1 General

SNC has established the necessary measures and governing procedures to assure that purchased items (components, spares and replacement parts necessary for plant design, construction, operation, refueling, maintenance and modifications) and services are subject to quality and technical requirements at least equivalent to those specified for original equipment or specified by properly reviewed and approved revisions to the original requirements to assure the items are suitable for the intended service, and are of acceptable quality, consistent with their effect on safety. Procurement document changes shall be subject to the same degree of control as utilized in the preparation of the original documents. These controls include provisions such that:

4.1.1 Where original technical or quality assurance requirements cannot be determined, an engineering evaluation is conducted and documented by qualified staff to establish appropriate requirements and controls to assure that interfaces, interchangeability, safety, fit and function, as applicable, are not adversely affected or contrary to applicable regulatory requirements.

4.1.2 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.

4.1.3 Applicable design bases and other requirements necessary to assure adequate quality shall be included or referenced in documents for procurement of items and services. To the extent necessary, procurement documents shall require suppliers to have a quality assurance program consistent with the applicable requirements of this QATR.

4.2 Reviewer Qualification

Reviews required by this Section shall be performed by personnel who have access to pertinent information and who have an adequate understanding of the requirements and intent of the procurement documents.

4.3 NQA-1-1994 Commitment

In establishing controls for procurement, SNC commits to compliance with NQA-1-1994, Basic Requirements 4 and Supplements 4S-1, with the following clarifications and exceptions:

NQA-1-1994, Supplement 4S-1

- Section 2.3 of Supplement 4S-1 includes a requirement that procurement documents require suppliers to have a documented quality assurance program that implements NQA-1-1994, Part 1. 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.

- With regard to service performed on a plant site by a supplier, SNC procurement documents may allow the supplier to work under the SNC quality assurance program, including implementing procedures, in lieu of the supplier having its own quality assurance program.

- Section 3 of this supplement 4S-1 requires procurement documents to be reviewed prior to bid or award of contract. The quality assurance review of procurement documents is satisfied through review of the applicable procurement specification, including the technical and quality procurement requirements, prior to bid or award of contract. Procurement document changes will also receive the quality assurance review; e.g., scope, technical, or quality requirements.

- Procurement documents for Commercial Grade Items that will be procured by SNC for use as safety-related items shall contain technical and quality requirements such that the procured item can be appropriately dedicated.

SECTION 5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

5.1 General

SNC has established the necessary measures and governing procedures to ensure that activities affecting quality are prescribed by and performed in accordance with instructions, procedures or drawings of a type appropriate to the circumstances and which, where applicable, include quantitative or qualitative acceptance criteria to implement the QAP as described in the QATR. Such documents are prepared and controlled according to Part II, Section 6 of this QATR. In addition, means are provided for dissemination to plant staff of instructions of both general and continuing applicability, as well as those of short-term applicability. Provisions are included for reviewing, updating, and canceling such procedures.

5.2 Procedure Adherence

5.2.1 The SNC policy is that procedures are followed, and the requirements for use of procedures have been established in administrative procedures.

5.2.2 Where procedures cannot be followed as written, provisions are established for making changes in accordance with Part II, Section 6 of this QATR.

5.2.3 Requirements are established to identify the manner in which procedures are to be implemented, including identification of those tasks that require:

- the written procedure to be present and followed step-by-step while the task is being performed,
- the user to have committed the procedure steps to memory,
- verification of completion of significant steps, by initials or signatures or use of check-off lists.

5.2.4 Procedures that are required to be present and referred to directly are those developed for extensive or complex jobs where reliance on memory cannot be trusted, tasks that are infrequently performed, and tasks where steps must be performed in a specified sequence.

5.3 Temporary Procedure Control

Administrative procedures prescribe the methods whereby plant procedures can be temporarily revised without undue delay when the need arises. Temporary procedure revisions that do not change intent of the approved procedure may be made with the concurrence of two individuals, one of which holds a senior reactor operator's license on the affected unit. Such revisions are documented and, if required, reviewed by the Plant Review Board and approved by the appropriate plant management within 14 days of implementation. In cases of emergency, personnel are authorized to depart from approved procedures when necessary to prevent injury

to personnel or damage to the plant. Such procedures are logged describing the prevailing conditions and reasons for the action taken.

Temporary Procedures include designation of the period of time during which they may be used and are subject to the procedure review process as applicable.

5.4 Procedure Content

The established measures address the applicable content of procedures as described in the introduction to Part II of NQA-1-1994. In addition, procedures governing tests, inspections, operational activities, and maintenance will include as applicable, initial conditions and prerequisites for the performance of the activity.

5.5 NQA-1-1994 Commitment

In establishing procedural controls, SNC commits to compliance with NQA-1-1994, Basic Requirement 5.

SECTION 6 DOCUMENT CONTROL

6.1 General

SNC has established the necessary measures and governing procedures to control the preparation of, issuance of, and changes to documents that specify quality requirements or prescribe how activities affecting quality are controlled to assure that correct documents are being employed. Such documents, including changes thereto, shall be reviewed for adequacy and approved for release by authorized personnel.

The control system shall be documented and shall provide the following:

- identification of documents to be controlled and their specified distribution;
- a method to identify the correct document (including revision) to be used and control of superseded documents;
- identification of assignment of responsibility for preparing, reviewing, approving, and issuing documents;
- review of documents for adequacy, completeness, and correctness prior to approval and issuance;
- coordinating and controlling interface documents and procedures; and
- a method for providing feedback from users to continually improve procedures and work instructions.

6.2 Changes to Documents

6.2.1 Changes to documents, other than those defined in implementing procedures as minor changes, are considered as major changes and shall be reviewed and approved by the same organizations that performed the original review and approval unless other organizations are specifically designated.

6.2.2 The reviewing organization shall have access to pertinent background data or information upon which to base their approval.

6.2.3 Minor changes to documents, such as inconsequential editorial corrections, shall not require that the revised documents receive the same review and approval as the original documents.

6.2.4 To avoid a possible omission of a required review, the type of minor changes that do not require such a review and approval and the persons who can authorize such a decision shall be clearly delineated in implementing procedures.

6.3 NQA-1-1994 Commitment

In establishing provisions for document control, SNC commits to compliance with NQA-1-1994, Basic Requirement 6 and Supplement 6S-1.

SECTION 7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

7.1 General

SNC has established the necessary measures and governing procedures to control the procurement of items and services to assure conformance with specified requirements. Such control shall provide for the following as appropriate: source evaluation and selection, evaluation of objective evidence of quality furnished by the Supplier, source inspection, audit, and examination of items or services upon delivery or completion.

7.2 Acceptance of Item or Service

7.2.1 SNC establishes and implements measures to assure the quality of purchased items and services, whether purchased directly or through contractors, at intervals and to a depth consistent with the item's or service's importance to safety, complexity, quantity and the frequency of procurement. Verification actions include testing, as appropriate, during operation phase activities, including those associated with plant maintenance or modifications. Verifications occur at the appropriate phases of the procurement process, including, as necessary, verification of activities of suppliers below the first tier.

7.2.2 Measures to assure the quality of purchased items and services include the following, as applicable:

7.2.2.1 Items are inspected, identified, and stored to protect against damage, deterioration, or misuse.

7.2.2.2 Prospective suppliers of safety-related items and services are evaluated to assure that only qualified suppliers are used. Qualified suppliers are audited on a triennial basis. In addition, if a subsequent contract or a contract modification significantly enlarges the scope of or changes the methods or controls for activities performed by the same supplier, an audit of the modified requirements is conducted. SNC may utilize audits conducted by outside organizations for supplier qualification provided that the scope and adequacy of the audits meet SNC requirements. Annual evaluation of suppliers is performed in accordance with approved procedures. As an alternate, supplier performance monitoring may be used. Industry programs, such as those applied by ASME, Nuclear Procurement Issues Committee (NUPIC), or other established utility groups, are used as input or the basis for supplier qualification whenever appropriate. The results of the reviews are promptly considered for effect on a supplier's continued qualification and adjustments made as necessary (including corrective actions, adjustments of supplier audit plans, and input to third party auditing entities, as warranted). In addition, results are reviewed periodically to determine if, as a whole, they constitute a significant condition adverse to quality

requiring additional action.

7.2.2.3 Provisions are made for accepting purchased items and services, such as source verification, receipt inspection, pre- and post-installation tests, certificates of conformance, and document reviews. Acceptance actions are completed to ensure that procurement, inspection, and test requirements, as applicable, have been satisfied before relying on the item to perform its intended safety function.

7.2.2.4 Controls are imposed for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt and acceptance of commercial-grade services or “off-the-shelf” items to assure they will perform satisfactorily in service in safety related applications.

7.2.2.5 If there is insufficient evidence of implementation of a QA program, the initial evaluation is of the existence of a QA program addressing the scope of services to be provided. The initial audit is performed after the supplier has completed sufficient work to demonstrate that its organization is implementing a QA program.

7.3 NQA-1-1994 Commitment/Exceptions

In establishing procurement verification controls, SNC commits to compliance with NQA-1-1994, Basic Requirement 7 and Supplement 7S-1, with the following clarifications and exceptions:

7.3.1 NQA-1-1994, Supplement 7S-1

7.3.1.1 SNC considers that other 10 CFR 50 licensees, Authorized Nuclear Inspection Agencies, National Institute of Standards and Technology, or other State and Federal agencies which may provide items or services to SNC plants are not required to be evaluated or audited.

7.3.1.2 When purchasing commercial grade calibration or testing services from a laboratory holding accreditation by an accrediting body recognized by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA), commercial grade surveys need not be performed provided all of the following conditions are met:

7.3.1.2.1 A documented review of the supplier's accreditation is performed and includes a verification of the following:

- The calibration or test laboratory holds accreditation by an accrediting body recognized by the ILAC MRA. The accreditation encompasses ISO/IEC-17025:2017, General Requirements for the Competence of Testing and Calibration Laboratories.

- For procurement of calibration services, the published scope of

accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties.

- 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.

- 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.

7.3.1.2.2 The purchase documents require that:

- The service must be provided in accordance with their accredited ISO/IEC-17025:2017 program and scope of accreditation.

- 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)

- The equipment/standards used to perform the calibration must be identified in the certificate of calibration. (for calibration services only)

- Subcontracting of these accredited services is prohibited.

- The customer must be notified of any condition that adversely impacts the laboratory's ability to maintain the scope of accreditation.

- 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.

- Any additional technical and quality requirements, as necessary, based upon a review of the procured scope of services, which may include, but are not necessarily limited to, tolerances, accuracies, ranges, and industry standards.

7.3.1.2.3 It is validated, at receipt inspection, that the laboratory's documentation certifies that:

- The contracted calibration or test service has been performed in accordance with their ISO/IEC-17025:2017 program and has been performed within their scope of accreditation, and

- The purchase order's requirements are met.

7.3.1.2.4 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.

7.3.1.3 For Section 8.1, SNC considers documents that may be stored in approved electronic media under SNC control and not physically located on the plant site but which are accessible from the respective nuclear facility site as meeting the NQA-1 requirement for documents to be available at the site.

7.3.1.4 As clarification for Section 8.1, SNC allows for the establishment of appropriate controls associated with conditional releases of nonconforming items for installation, consistent with the provisions of Section 15 of this QATR. Accordingly, items may be conditionally released as described in Section 15 prior to receipt of documentary evidence that items conform to procurement documents.

7.3.1.5 In lieu of the requirements of 7S-1, Section 10, Commercial Grade Items, controls for commercial grade items and services are established in SNC documents using the guidance of EPRI NP-5652, dated June 1988, as discussed in Generic Letter 89-02 and Generic Letter 91-05.

7.3.1.5.1 For commercial grade items, special quality verification requirements are established and described in SNC documents to provide the necessary assurance an item will perform satisfactorily in service. The SNC documents address determining the critical characteristics that ensure an item is suitable for its intended use, technical evaluation of the item, receipt requirements, and quality evaluation of the item.

7.3.1.5.2 SNC will also use other appropriate approved regulatory means and controls to support SNC commercial grade dedication activities. SNC will assume 10 CFR 21 reporting responsibility for all items that SNC dedicates as safety-related.

7.3.1.6 Pandemic & Exigent Conditions

7.3.1.6.1 Within Requirement 7S-1, the terms “direct evaluation” and “audit” may be satisfied using remote assessment techniques in pandemic or exigent conditions.

7.3.1.6.2 In the case of pandemic or exigent conditions, SNC has adopted EPRI Document – 3002020796 – Remote Assessment Techniques: Planning and Conducting Audits and Surveys Using Remote Techniques During Exigent Conditions, April 2021

SECTION 8 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

8.1 General

8.1.1. SNC has established the necessary measures and governing procedures to identify and control items to prevent the use of incorrect or defective items.

8.1.2. This includes controls for consumable materials and items with limited shelf life to preclude the use of items whose shelf life has expired.

8.1.3. The identification of items is maintained throughout fabrication, erection, installation and use so that the item can be traced to its documentation, consistent with the item's effect on safety. Identification locations and methods are selected so as not to affect the function or quality of the item.

8.2 NQA-1-1994 Commitment

8.2.1. In establishing provisions for identification and control of items, SNC commits to compliance with NQA-1-1994, Basic Requirement 8 and Supplement 8S-1.

SECTION 9 CONTROL OF SPECIAL PROCESSES

9.1 General

9.1.1 SNC has established the necessary measures and governing procedures to assure that special processes that require interim process controls to assure quality, such as welding, heat treating, and nondestructive examination, are controlled.

9.1.2 These provisions include assuring that special processes are accomplished by qualified personnel using qualified procedures and equipment. Special processes are performed in accordance with applicable codes, standards, specifications, criteria or other specially established requirements.

9.1.3 Special processes are those where the results are highly dependent on the control of the process or the skill of the operator, or both, and for which the specified quality cannot be fully and readily determined by inspection or test of the final product.

9.2 NQA-1-1994 Commitment

9.2.1 In establishing measures for the control of special processes, SNC commits to compliance with NQA-1-1994, Basic Requirement 9 and Supplement 9S-1.

SECTION 10 INSPECTION

10.1 General

10.1.1 SNC has established the necessary measures and governing procedures to implement inspections that assure items, services and activities affecting safety meet established requirements and conform to applicable documented specifications, instructions, procedures, and design documents.

10.1.2 Inspection may also be applied to items, services and activities affecting plant reliability and integrity. Types of inspections may include those verifications related to procurement, such as source, in-process, final, and receipt inspection, as well as maintenance, modification, in-service, and operational activities.

10.1.3 Inspections are carried out by properly qualified persons independent of those who performed or directly supervised the work. Inspection results shall be documented. Where quality verification inspections at plants are performed by the maintenance organization, the inspectors report to the engineering support organization while performing inspections in order to meet the independence requirements of NQA-1-1994, Supplement 10S-1, Section 3.1.

10.2 NQA-1-1994 Commitment

10.2.1 In establishing inspection requirements, SNC commits to compliance with NQA-1-1994, Basic Requirement 10, Supplement 10S-1 and Subpart 2.4, with the clarification that follows below. In addition, for situations comparable to original new plant construction, SNC commits to compliance with the requirements of Subparts 2.5 and 2.8 for establishing appropriate inspection requirements.

- Subpart 2.4 commits SNC to IEEE 336-1985. IEEE 336-1985 refers to IEEE 498-1985. Both IEEE 336-1985 and IEEE 498-1985 use the definition of “Safety Systems Equipment” from IEEE 603-1980. SNC commits to the definition of Safety Systems Equipment in IEEE 603-1980, but does not commit to the balance of that standard.

- 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. (Vogtle 3&4 only)

- An additional exception to Subpart 2.4 is contained in Section 12 of this QATR.

SOUTHERN NUCLEAR OPERATING COMPANY, INC.
QUALITY ASSURANCE TOPICAL REPORT

SECTION 11 TEST CONTROL

11.1 General

11.1.1 SNC has established the necessary measures and governing procedures to demonstrate that items subject to the provisions of this QATR will perform satisfactorily in service, that the plant can be operated safely and as designed, and that the coordinated operation of the plant as a whole is satisfactory.

11.1.2 These programs include criteria for determining when testing is required, such as proof tests before installation, pre-operational tests, post-maintenance tests, post-modification tests, in-service tests, and operational tests (such as surveillance tests required by Plant Technical Specifications), to demonstrate that performance of plant systems is in accordance with design. Programs also include provisions for establishing and adjusting test schedules and maintaining status for periodic or recurring tests. Tests are performed according to applicable procedures that include, consistent with the effect on safety,

11.1.2.1 instructions and prerequisites to perform the test,

11.1.2.2 use of proper test equipment,

11.1.2.3 acceptance criteria, and

11.1.2.4 mandatory verification points as necessary to confirm satisfactory test completion.

11.1.3 Test results are documented and evaluated by the organization performing the test and reviewed by a responsible authority to assure that the test requirements have been satisfied. If acceptance criteria are not met, retesting is performed as needed to confirm acceptability following correction of the system or equipment deficiencies that caused the failure.

11.1.4 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.

11.2 NQA-1-1994 Commitment

11.2.1 In establishing provisions for testing, SNC commits to compliance with NQA-1-1994, Basic Requirement 11 and Supplement 11S-1.

11.2.2. Commitment for Computer Program Testing

SNC establishes and implements provisions to assure that computer software used in applications affecting safety is prepared, documented, verified and tested, and used such that the expected output is obtained and configuration control maintained. To this end SNC commits to compliance with the requirements of NQA 1 1994, Basic Requirement 11, Supplement 11S 2 and Subpart 2.7 to establish the appropriate provisions.

SECTION 12 CONTROL OF MEASURING AND TEST EQUIPMENT

12.1 General

12.1.1 For the operations phase of the plants, SNC has established and implements procedures for the calibration and adjustment of instrument and control devices installed in the plants. The calibration and adjustment of these installed devices is accomplished through the plant maintenance programs to ensure that each plant is operated within its design and technical requirements. Appropriate documentation will be maintained for these devices to indicate the control status, when the next calibration is due, and identify any limitations on the use of the device.

12.1.2 SNC has also established the necessary measures and governing procedures to control the calibration, maintenance, and use of measuring and test equipment that is not installed as plant equipment and that provides information important to safe plant operation. The provisions of such procedures cover equipment such as indicating and actuating instruments and gages, tools, reference and transfer standards, and nondestructive examination equipment.

12.1.3 The suppliers of commercial-grade calibration services shall be controlled as described in Part II, Section 7.

12.1.4 The provisions of this QATR Section are intended to assure that:

- Measuring and test equipment is calibrated at specified intervals on the basis of the item's required accuracy, intended use, frequency of use, and stability characteristics or other conditions affecting its performance. Alternatively, equipment may be calibrated immediately before and after use if a defined interval is not appropriate.

- Measuring and test equipment is labeled, tagged or otherwise controlled to indicate its calibration status and provide traceability to calibration test data or records.

- Calibrations are performed against standards that have an accuracy of at least four times the required accuracy of the equipment being calibrated. When this is not possible, the standards have an accuracy that ensures the equipment being calibrated will be within the required tolerance.

- Where possible, calibration standards are traceable to appropriate national standards. Calibration standards have greater accuracy than the standards being calibrated, except where the same accuracy as the instruments being calibrated can be shown to be adequate for the service requirements.

- Measuring and test equipment found out of calibration is tagged or segregated and not used until it is successfully re-calibrated. An evaluation is performed to determine the acceptability of any items measured, inspected or tested with an out-of-calibration device from the time of the previous calibration.

12.2NQA-1-1994 Commitment

12.2.1 In establishing provisions for control of measuring and test equipment, SNC commits to compliance with NQA-1-1994, Basic Requirement 12, Supplement 12S-1 and Subpart 2.16 for establishing appropriate requirements for calibration and control of measuring and test equipment, with the following clarifications and exceptions:

12.2.1.1 NQA-1-1994, Subpart 2.16 (ANSI/IEEE 498-1985)

- Section 5.5 of ANSI/IEEE 498-85 requires all M&TE to be labeled. SNC plants may not label certain M&TE, such as installed instrumentation, but will provide other means of identification so that appropriate controls can be implemented. This exception also applies to labeling and tagging of items requiring calibration as discussed in Section 7.2.1 of ANSI/IEEE 336-85 (NQA-1, Subpart 2.4).

SECTION 13 HANDLING, STORAGE, AND SHIPPING

13.1 General

13.1.1 SNC has established the necessary measures and governing procedures to control the handling, storage, packaging, shipping, cleaning, and preservation of items to prevent inadvertent damage or loss, and to minimize deterioration.

13.1.2 These provisions include specific procedures, when required to maintain acceptable quality of the items important to safety. Items are appropriately marked and labeled during packaging, shipping, handling and storage to identify, maintain, and preserve the item's integrity and indicate the need for special controls.

13.1.3 Special controls (such as containers, shock absorbers, accelerometers, inert gas atmospheres, specific moisture content levels and temperature levels) are provided when required to maintain acceptable quality.

13.2 Housekeeping

13.2.1 Housekeeping practices during normal operations and maintenance activities, including refueling, are established to account for conditions or environments that could affect the quality of structures, systems and components within the plant. This includes control of cleanness of facilities and materials, fire prevention and protection, disposal of combustible material and debris, control of access to work areas, protection of equipment, radioactive contamination control and storage of solid radioactive waste.

13.2.2 Housekeeping practices help assure that only proper materials, equipment, processes and procedures are used and that the quality of items is not degraded. Necessary procedures or work instructions, such as for electrical bus and control center cleaning, cleaning of control consoles, and radioactive decontamination are developed and used.

13.3 NQA-1-1994 Commitment

In establishing provisions for handling, storage and shipping, SNC commits to compliance with NQA-1-1994, Basic Requirement 13 and Supplement 13S-1. SNC also commits to compliance with the requirements of NQA-1-1994, Subparts 2.1, 2.2, and 2.3 (Farley, Hatch, and Vogtle 1&2), with the following clarifications and exceptions:

13.3.1 NQA-1-1994, Subpart 2.1

- Subpart 2.1, Sections 3.1 and 3.2, establish criteria for classifying items into cleanness classes and requirements for each class. Instead of using the cleanness level system of Subpart 2.1, SNC plants may establish cleanness requirements on a case-by-case basis, consistent with the other provisions of Subpart 2.1. SNC

establishes appropriate cleanliness controls for work on safety related equipment to minimize introduction of foreign material and maintain system/component cleanliness throughout maintenance or modification activities, including documented verification of absence of foreign materials prior to system closure.

13.3.2 NQA -1-1994, Subpart 2.2

- Subpart 2.2, Sections 3.2 and 3.5: For items in storage, as determined by facility management, the packaging requirements described under Section 3, Packaging, may include alternate methods of affording required protection such as maintaining a storage atmosphere free from harmful contaminants in concentrations that could produce damage to the stored items, or utilizing storage practices that obviate the need for capping all openings.

- Subpart 2.2, Section 6.6, “Storage Records:” This section requires written records be prepared containing information on personnel access. As an alternative to this requirement, SNC documents establish controls for storage areas that describe those authorized to access areas and the requirements for recording access of personnel. However, these records of access are not considered quality records and will be retained in accordance with the administrative controls of the applicable plant.

- Subpart 2.2, Section 7.1 refers to Subpart 2.15 for requirements related to handling of items. The scope of Subpart 2.15 includes hoisting, rigging and transporting of items for nuclear power plants. This scope exceeds the scope of the NRC’s original endorsement of ANSI N45.2.2 in Regulatory Guide 1.38, and establishes requirements for which there is no NRC regulatory position. In lieu of compliance with Subpart 2.15, SNC establishes and implements controls over hoisting, rigging and transport activities to the extent necessary to protect the integrity of the items involved, as well as potentially affected nearby structures and components. For re-rating of lifting equipment to allow “special lifts,” SNC performs dynamic load testing over the full range of the lift using test loads at least 110% of the lift weight. Dynamic tests include raising, lowering and traversing the load. Where required, SNC complies with applicable hoisting, rigging and transportation regulations and codes.

13.3.3 NQA-1-1994, Subpart 2.3 requires a written record of the entry and exit of all personnel be established and maintained for Zones I, II, and III. The following exceptions are taken:

- Instead of the five-level zone designation in Subpart 2.3, Section 2.2, SNC bases its control over housekeeping activities on a consideration of what is necessary and appropriate for the activity involved. The controls are effected through procedures or instructions which, in the case of maintenance or modification work, are developed on a case-by-case basis. Factors considered in developing the procedures and instructions include cleanliness control, personnel safety, fire prevention and protection, radiation control, and security. The procedures and instructions make use of standard janitorial and work practices to the extent possible.

SECTION 14 INSPECTION, TEST, AND OPERATING STATUS

14.1 General

14.1.1 SNC has established the necessary measures and governing procedures to identify the inspection, test, and operating status of items and components subject to the provisions of this QATR in order to maintain personnel and reactor safety and avoid unauthorized operation of equipment.

14.1.2 Where necessary to preclude inadvertent bypassing of inspections or tests, or to preclude inadvertent operation, these measures require the inspection, test or operating status be verified before release, fabrication, receipt, installation, test or use. These measures also establish the necessary authorities and controls for the application and removal of status indicators or labels.

14.2 NQA-1-1994 Commitment

In establishing measures for control of inspection, test and operating status, SNC commits to compliance with NQA-1-1994, Basic Requirement 14.

SECTION 15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

15.1 General

15.1.1 SNC has established the necessary measures and governing procedures to control items, including services, which do not conform to specified requirements to prevent inadvertent installation or use.

15.1.2 Controls provide for identification, documentation, evaluation, segregation when practical, and disposition of nonconforming items, and for notification to affected organizations.

15.1.3 Controls require a nonconforming condition is identified, described, and documented in accordance with Section 16, Corrective Action, of this QATR.

15.1.4 Controls are provided to address conditional release of nonconforming items for use on an at risk basis prior to resolution and disposition of the nonconformance, including maintaining identification of the item and documenting the basis for such release.

15.1.5 Conditional release of nonconforming items for installation requires the approval of the vice president - site or his designee. Nonconformances are corrected or resolved prior to depending on the item to perform its intended safety function.

15.1.6 Nonconformances are evaluated for impact on operability of quality structures, systems, and components to assure that the final condition does not adversely affect safety, operation, or maintenance of the item or service.

15.1.7 Nonconformances to design requirements dispositioned repair or use-as-is, shall be subject to design control measures commensurate with those applied to the original design.

15.2 NQA-1-1994 Commitment

In establishing measures for nonconforming materials, parts, or components, SNC commits to compliance with NQA-1-1994, Basic Requirement 15, and Supplement 15S-1.

SECTION 16 CORRECTIVE ACTION

16.1 General

16.1.1 SNC has established the necessary measures and governing procedures to promptly identify, control, document, classify, and correct conditions adverse to quality.

16.1.2 SNC procedures require personnel to identify known conditions adverse to quality and assure that corrective actions are documented and initiated in accordance with regulatory guidance and applicable quality standards.

16.1.3 When complex issues arise where it cannot be readily determined if a condition adverse to quality exists, SNC documents establish the requirements for documentation and timely evaluation of the issue.

16.1.4 Results of evaluations of conditions adverse to quality are analyzed to identify trends. Significant conditions adverse to quality and significant adverse trends are documented and reported to responsible management.

16.2 NQA-1-1994 Commitment

In establishing provisions for corrective action, SNC commits to compliance with NQA-1-1994, Basic Requirement 16.

SECTION 17 QUALITY ASSURANCE RECORDS

17.1 General

17.1.1 SNC has established the necessary measures and governing procedures to ensure that sufficient records of items and activities affecting quality are developed, reviewed, approved, issued, used, and revised to reflect completed work. The provisions of such procedures establish the scope of the records retention program for SNC and include requirements for records administration, including receipt, preservation, retention, storage, safekeeping, retrieval, access controls, user privileges and final disposition.

17.1.2 For activities governed by 10 CFR 71 or 72, these provisions address the specific requirements of Sections 71.135 and 72.174.

17.2 Record Retention

17.2.1 Measures are established that ensure that sufficient records of completed items and activities affecting quality are appropriately stored.

17.2.2 Records of activities for design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits include the appropriate content requirements of NQA-1-1994, Parts I and II. Such records and their retention times are based on Regulatory Position C.2, Table 1, of Regulatory Guide 1.28, Revision 3. This table addresses design, construction, and initial start-up records and will be applied to operating and decommissioning phase records that are similar in nature to the construction records.

17.2.3 Additional operations phase records and their retention periods are identified in applicable UFSARs.

17.2.4 In addition, SNC uses the list of records in 10 CFR 71.135 and 10 CFR 72.174 to establish the types of records that will be created and retained in support of transportation and storage operations governed by 10 CFR Part 71 and Part 72, respectively. In all cases where state, local, or other agencies have more restrictive requirements for record retention, those requirements will be met.

17.3 Electronic Records

17.3.1 When using electronic records storage and retrieval systems, SNC complies with NRC guidance in RIS 2000-18, October 2000, “Guidance on Managing Quality Assurance Records in Electronic Media” including NIRMA guidelines; TG 11-1998, TG15-1998, TG16-1998, and TG21-1998. SNC will also meet the NRC Regulatory Position C.2 of Regulatory Guide 1.28, Revision 3, August 1985 except that the reference to ASME NQA-1 will be to the 1994 edition.

17.4 NQA-1-1994 Commitment

In establishing provisions for records, SNC commits to compliance with NQA-1-1994, Basic Requirement 17 and Supplement 17S-1, with the following clarifications and exceptions:

- NQA-1-1994, Supplement 17S-1
  - Supplement 17S-1, Section 4.2(b) requires records to be firmly attached in binders or placed in folders or envelopes for storage in steel file cabinets or on shelving in containers. For hard-copy records maintained by SNC, the records are suitably stored in steel file cabinets or on shelving in containers, except that methods other than binders, folders or envelopes may be used to organize the records for storage.

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SECTION 18 AUDITS

18.1 General

18.1.1 SNC has established the necessary measures and governing procedures to implement audits to verify that activities covered by this QATR are performed in conformance with the requirements established. The audit programs are themselves reviewed for effectiveness as a part of the overall audit process. In addition to audits, SNC may also provide oversight with surveillances.

18.2 Performance of Audits

18.2.1 Audits of facility activities shall be performed within the specified time interval with the following allowances (allowances do not apply to audits of the emergency plan and security plan):

18.2.1.1 Audits shall be performed at the intervals designated herein for each audit area. Schedules shall be based on the month in which the audit starts.

18.2.1.2 A maximum extension not to exceed 25% of the audit interval shall be allowed. That is, for audits on a 36 month frequency, the maximum time between specific audits shall not exceed 45 months. For audits on a 24 month frequency, the maximum time between specific audits shall not exceed 30 months. Likewise, audits on an annual (12 month) frequency shall not be extended beyond 15 months.

18.2.1.3 When an audit interval extension greater than one month is used, the next audit for that particular audit area will be scheduled from the original anniversary month rather than from the month of the extended audit.

18.2.2 The following audits of facility activities are required:

18.2.2.1 The conformance of reactor and plant operation to provisions contained within the technical specifications and applicable license conditions, at least once per 36 months;

18.2.2.2 The performance, training, and qualifications of the entire plant staff, at least once per 36 months;

18.2.2.3 The results of actions taken to correct deficiencies occurring in plant equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 36 months;

18.2.2.4 The performance of activities required by the quality assurance program to

meet the criteria of 10 CFR50, Appendix B, at least once per 36 months;

18.2.2.5 The emergency plan and implementing procedures, in accordance with 10 CFR 50.54(t) requirements with the clarification that subsequent audit due dates are based on the month the previous audit was started;

18.2.2.6 The security plan and implementing procedures, in accordance with 10 CFR 50.54(p) and 10 CFR 73.55 requirements.

18.2.2.7 The fire protection program, at least once per 36 months. The audit will include the fire protection program implementation, organization, personnel, training, fire protection equipment, procedures, and program controls. The audit team will include an outside qualified fire protection consultant.

18.2.2.8 The radiological environmental monitoring program and the results thereof at least once per 36 months;

18.2.2.9 The offsite dose calculation manual (ODCM) and implementing procedures, at least once per 36 months;

18.2.2.10 The process control program (PCP) and implementing procedures for processing and packaging of radioactive waste, at least once per 36 months;

18.2.2.11 The environmental protection plan (EPP), at least once per 36 months;

18.2.2.12 Any other area of plant operation considered appropriate by the vice-president - site.

18.2.3 Audit of supplier activities shall be performed at 36 month intervals. Annual evaluation of suppliers is performed in accordance with approved procedures. As an alternate, supplier performance monitoring may be used. A maximum extension not to exceed 25% of the audit interval shall be allowed. The combined time interval for any three consecutive audit intervals should not exceed 3.25 times the specified audit interval.

18.2.4 Audit schedule changes reflecting more frequent audits are required by one or more of the following conditions:

18.2.4.1 When significant changes are made in functional areas of the QAP, such as significant reorganization or procedure revisions.

18.2.4.2 When there is evidence that the performance or reliability of safety-related items is in jeopardy due to deficiencies or nonconformances in the QAP.

18.2.4.3 When a systematic, independent assessment of QAP effectiveness is necessary.

18.2.4.4 When it is necessary to verify implementation of required corrective actions.

18.2.5 Audit reports as described above shall be forwarded to the management positions responsible for the areas audited within 30 days after completion by the auditing organization.

18.3 NQA-1-1994 Commitment

In establishing the independent audit program, SNC commits to compliance with NQA-1-1994, Basic Requirement 18 and Supplement 18S-1.

PART III REGULATORY COMMITMENTS

NRC Regulatory Guides and Quality Assurance Standards.

This section identifies the NRC Regulatory Guides and the other quality assurance standards which have been selected to supplement and support the SNC QA Program. Southern Nuclear commits to compliance with these standards to the extent described herein. Commitment to a particular Regulatory Guide or other QA standard does not constitute a commitment to the Regulatory Guides or QA standards that may be referenced therein.

1.0 Regulatory Guides

1.1 Regulatory Guide 1.8 – Qualification and Training of Personnel for Nuclear Power Plants

1.1.1 Southern Nuclear meets the requirement of the applicable Technical Specifications for each plant for the selection and training of nuclear power plant personnel.

1.1.2 The SNC nuclear plant qualification and training program is described in Sections 13.1 and 13.2 of the Farley, Hatch and Vogtle 1&2 FSARs and Chapter 1, Appendix 1A and Table 1.9-1, Regulatory Guide/Section Cross-References, for Vogtle 3&4.

1.1.3 SNC identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1, Appendix 1A (Vogtle 3&4 Only).

1.2 Regulatory Guide 1.26, Revision 4, March 2007 – Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants (Vogtle 3&4 Only)

1.2.1 SNC identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1, Appendix 1A and Table 1.9-1 (Vogtle 3&4 Only).

1.3 Regulatory Guide 1.28, Revision 3, August, 1985 – Quality Assurance Program Requirements (Design and Construction)

1.3.1 Southern Nuclear meets the requirements of this regulatory guide for Construction Activities conducted by Southern Nuclear, except that ASME NQA-1-1994 edition (as modified by the exceptions to NQA-1-1994 as shown in this QATR) will be used in place of ANSI/ASME NQA-1-1983 and the ANSI/ASME NQA-1a-1983 Addenda.

1.3.2 Within Regulatory Guide 1.28, the terms “direct evaluation” and “audit” may be

satisfied using remote assessment techniques in pandemic or exigent conditions.

1.4 Regulatory Guide 1.29, Revision 4, March 2007 – Seismic Design Classification (Vogtle 3&4 Only)

1.4.1 Southern Nuclear identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1, Appendix 1A and Table 1.9-1 for Vogtle 3&4.

1.5 Regulatory Guide 1.33, Revision 2, February 1978 – Quality Assurance Program Requirements (Operation)

1.5.1 Southern Nuclear considers that the collective quality assurance requirements of this QATR and the QA requirements of ASME NQA-1-1994 are equivalent to ANSI N18.7-1976/ANS-3.2 and Regulatory Guide 1.33, Revision 2. Consequently, Southern Nuclear does not commit to ANSI N18.7-1976, or to Regulatory Guide 1.33, except that Appendix A of Regulatory Guide 1.33 shall be used as guidance for establishing the procedures required for plant operational phase activities.

1.6 Regulatory Guide 1.37, Revision 1, March 2007 – Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants (Vogtle 3&4 Only)

1.6.1 Southern Nuclear identifies conformance and exceptions for the applicable regulatory position guidance provided in this regulatory guide in FSAR Chapter 1, Appendix 1A and Table 1.9-1.

2.0 Standards:

2.1 ASME NQA-1-1994 Edition – Quality Assurance Requirements for Nuclear Facility Applications

2.1.1. SNC commits to NQA-1-1994, Parts I, II, and III as described in the foregoing sections of this document.

2.2 Nuclear Information and Records Management Association, Inc. (NIRMA) Technical Guides (TGs)

2.2.1. SNC commits to NIRMA TGs as described in Part II, Section 17

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PART IV: QUALITY ASSURANCE OF THE INDEPENDENT SPENT-FUEL STORAGE INSTALLATION

This Part describes the administrative controls and the quality assurance (QA) program requirements applied to important-to-safety (ITS) structures, systems, and components associated with independent spent fuel storage installation (ISFSI) to assure conformance to regulatory requirements and the design bases. This program is an extension of the quality assurance program requirements described in the QATR, modified to address 10 CFR 72 Subpart G items specific to ISFSI and related support activities. This Part is applicable to all SNC nuclear plants with ISFSIs.

The QA program requirements described in the QATR are applicable to ISFSI items classified as ITS Category A and ITS Category B. Specific aspects of the QA program requirements described in the QATR are applied to ITS Category C items as specified in the individual subsections.

The following definitions are applicable to activities and items covered by this Part:

ITS structures, systems, and components are those features of an ISFSI whose function is to:

- Maintain the conditions required to store spent fuel safely,
- Prevent damage to the spent fuel container during handling storage, or
- Provide reasonable assurance that spent fuel can be received, handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.

The definition of ITS safety categories below are based on NUREG/CR-6407, “Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety.”

1. Category A - ITS Category A items include structures, components, and systems whose failure could directly result in a condition adversely affecting public health and safety. The failure of a single item could cause loss of primary containment leading to release of radioactive material, loss of shielding, or unsafe geometry compromising criticality control.

2. Category B - ITS Category B items include structures, components, and systems whose failure or malfunction could indirectly result in a condition adversely affecting public health and safety. The failure of a Category B item, in conjunction with failure of an additional item, could result in an unsafe condition.

3. Category C - ITS Category C items include structures, components, and systems whose failure or malfunction would not significantly reduce the packaging effectiveness and would not be likely to create a situation adversely affecting public health and safety.

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The QA program requirements, as described in the following QATR sections and subsections, are applied to ITS Category A, B, and C items unless modified by the description below:

- Part II, Section 1 Organization

  The corporate organization established to support the operation of the plant also functions to support operation of the ISFSI.

  Additional offsite support is provided by the spent fuel storage vendor.

  Those plant organizations with responsibilities related to 10 CFR 50.59 evaluation reviews also perform the corresponding ISFSI evaluation reviews under 10 CFR 72.48.

- Part II, Section 2 QA Program

  QA program requirements are applied to the ISFSI and support structures, systems, and components using a graded approach based on the ISFSI item classification. ITS Category A, B and C are identified in the respective 10 CFR 72.212 Report, as applicable. Items identified as not important to safety in the respective 10 CFR 72.212 Report are excluded from the QA program.

  The plant organization has the same responsibilities for ITS Category A and Category B items as it does for other plant activities.

- Part II, Section 3 Design Control

  Design control measures for ITS Category A and Category B items are applied where appropriate per the controls in the QATR. Additional review concerns that are specific to the ISFSI are criticality physics, shielding, and features to facilitate decontamination.

  The designs of ITS Category C items specify procurement, inspection, and testing at a level appropriate for the importance of the function performed.

- Part II, Section 4 Procurement Document Control

  A graded approach is applied through the use of a multi-level procurement classification system based upon the end-use of each item or service. Items procured as ITS Category A or Category B are controlled as described in the QATR. ITS Category A or Category B items procured as commercial grade are controlled by the existing commercial grade dedication program. ITS Category C items are procured as appropriate for function and safety importance, and are excluded from the provisions of 10 CFR 21.

- Part II, Section 5 Instructions, Procedures, and Drawings

- Part II, Section 6 Document Control

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- Part II, Section 16 Corrective Action
- Part II, Section 17 QA Records

  Records pertaining to design, fabrication, erection, testing, maintenance, and use of ITS items are maintained for the duration of the General License granted under Subpart K of 10 CFR 72 for the specific storage system.

- Part II, Section 18 Audits

  Audits are performed on a frequency not to exceed 36 months for quality activities related to the operation and maintenance of the ISFSI. A maximum extension not to exceed 25% of the audit interval shall be allowed. That is the maximum time between specific audits shall not exceed 45 months.

The QA program requirements, as described in the following identified QATR sections, are applied to ITS Category A and B items.

- Part II, Section 7 Control of Purchased Material, Equipment, and Services.
- Part II, Section 8 Identification and Control of Materials, Parts, and Components.
- Part II, Section 9 Control of Special Processes.
- Part II, Section 10 Inspection.
- Part II, Section 11 Test Control.
- Part II, Section 12 Control of Measuring and Test Equipment.
- Part II, Section 13 Handling, Storage, and Shipping.
- Part II, Section 14 Inspection, Test, and Operating Status.
- Part II, Section 15 Nonconforming Materials, Parts, and Components.

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PART V: NONSAFETY-RELATED SSC QUALITY CONTROL (VOGTLE 3&4 ONLY)

SECTION 1 Non-safety Related SSCs - Significant Contributors to Plant Safety

Specific program controls are applied to non-safety related SSCs, for which 10 CFR 50, Appendix B is not applicable, that are significant contributors to plant safety. The specific program controls consistent with applicable sections of the QATR are applied to those items in a selected manner, targeted at those characteristics or critical attributes that render the SSC a significant contributor to plant safety.

The following clarify the applicability of the QA Program to the nonsafety-related SSCs and related activities, including the identification of exceptions to the QA Program described in Part II, Sections 1 through 18 taken for non-safety-related SSCs.

1.0 Organization

The verification activities described in this part may be performed by the SNC line organization. The QA organization described in Part II is not required to perform these functions.

2.0 QA Program

SNC QA requirements for non-safety-related SSCs are established in this Part V of the QATR and appropriate procedures. Suppliers of these SSCs or related services describe the quality controls applied in appropriate procedures. A new or separate QA program is not required.

3.0 Design Control

SNC has design control measures to ensure that the contractually established design requirements are included in the design. These measures ensure that applicable design inputs are included or correctly translated into the design documents, and deviations from those requirements are controlled. Design verification is provided through the normal supervisory review of the designer's work.

4.0 Procurement Document Control

Procurement documents for items and services obtained by or for SNC include or reference documents describing applicable design bases, design requirements, and other requirements necessary to ensure component performance. The procurement documents are controlled to address deviations from the specified requirements.

5.0 Instructions, Procedures, and Drawings

SNC provides documents such as, but not limited to, written instructions, plant

procedures, drawings, vendor technical manuals, and special instructions in work orders, to direct the performance of activities affecting quality. The method of instruction employed shall provide an appropriate degree of guidance to the personnel performing the activity to achieve acceptable functional performance of the SSC.

6.0 Document Control

SNC controls the issuance and change of documents that specify quality requirements or prescribe activities affecting quality to ensure that correct documents are used. These controls include review and approval of documents, identification of the appropriate revision for use, and measures to preclude the use of superseded or obsolete documents.

7.0 Control of Purchased Items and Services

SNC employs measures, such as inspection of items or documents upon receipt or acceptance testing, to ensure that all purchased items and services conform to appropriate procurement documents.

8.0 Identification and Control of Purchased Items

SNC employs measures where necessary, to identify purchased items and preserve their functional performance capability. Storage controls take into account appropriate environmental, maintenance, or shelf life restrictions for the items.

9.0 Control of Special Processes

SNC employs process and procedure controls for special processes, including welding, heat treating, and nondestructive testing. These controls are based on applicable codes, standards, specifications, criteria, or other special requirements for the special process.

10.0 Inspection

SNC uses documented instructions to ensure necessary inspections are performed to verify conformance of an item or activity to specified requirements or to verify that activities are satisfactorily accomplished. These inspections may be performed by personnel in the line organization. Knowledgeable personnel are from the same discipline and have experience related to the work being inspected.

11.0 Test Control

SNC employs measures to identify required testing that demonstrates that equipment conforms to design requirements. These tests are performed in accordance with test instructions or procedures. The test results are recorded, and authorized individuals evaluate the results to ensure that test requirements are met.

12.0 Control of Measuring and Test Equipment (M&TE)

SNC employs measures to control M&TE use, and calibration and adjustment at specific intervals or prior to use.

13.0 Handling, Storage, and Shipping

SNC employs measures to control the handling, storage, cleaning, packaging, shipping, and preservation of items to prevent damage or loss and to minimize deterioration. These measures include appropriate marking or labels, and identification of any special storage or handling requirements.

14.0 Inspection, Test, and Operating Status

SNC employs measures to identify items that have satisfactorily passed required tests and inspections and to indicate the status of inspection, test, and operability as appropriate.

15.0 Control of Nonconforming Items

SNC employs measures to identify and control items that do not conform to specified requirements to prevent their inadvertent installation or use.

16.0 Corrective Action

SNC employs measures to ensure that failures, malfunctions, deficiencies, deviations, defective components, and non-conformances are properly identified, reported, and corrected.

17.0 Records

SNC employs measures to ensure records are prepared and maintained to furnish evidence that the above requirements for design, procurement, document control, inspection, and test activities have been met.

18.0 Audits

SNC employs measures for line management to periodically review and document the adequacy of the process, including necessary corrective action. Audits independent of line management are not required. Line management is responsible for determining whether reviews conducted by line management or audits conducted by any organization independent of line management are appropriate. If performed, audits are conducted and documented to verify compliance with design and procurement documents, instructions, procedures, drawings, and inspection and test activities. Where the measures of this part (Part V) are implemented by the same programs, processes, or procedures as the comparable activities of Part II, the audits performed under the provisions of Part II may be used to satisfy the review requirements of this Section (Part V, Section 1.18).

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SECTION 2 Non-safety-Related SSCs Credited for Regulatory Events

1.0 General

The following criteria apply to fire protection (10 CFR 50.48), anticipated transients without scram (ATWS) (10 CFR 50.62), the station blackout (SBO) (10 CFR 50.63) SSCs that are not safety related. SNC implements quality requirements for the fire protection system in accordance with Regulatory Position 1.7, “Quality Assurance,” in Regulatory Guide 1.189, “Fire Protection for Operating Nuclear Power Plants” as identified in FSAR Chapter 1. SNC implements the quality requirements for ATWS equipment in accordance with Part V, Section 1.SNC implements the quality requirements for SBO equipment in accordance with Part V, Section 1. Regulatory Guide 1.155 is not applicable for the AP1000 design in accordance with the certified design as shown in DCD Appendix 1A. Regulatory Guide 1.155 relates to the availability of safety related functions supported by AC power. Since AC power is not required to support the availability of safety-related functions, the guidance is not applicable.