

**NRC STAFF'S INFORMATION NEEDS FOR  
THE ENERGYSOLUTIONS 10 CFR PART 50 APPENDIX B  
QUALITY ASSURANCE PROGRAM DESCRIPTION TOPICAL REPORT**

On February 17, 2026, EnergySolutions submitted their Quality Assurance Program Description (QAPD) Topical Report (TR) Revision 0 (ADAMS Accession No. ML26048A290) for the U.S Nuclear Regulatory Commission (NRC) staff review. Revision 0 of the TR was determined by the NRC staff to be acceptable for review by letter dated March 13, 2026 (ML26049A076).

The NRC staff has completed an initial review of EnergySolutions's QAPD Revision 0 topical report and developed a set of preliminary questions and information needs to improve its understanding of the information presented in the report. The questions are intended to:

- Obtain clarification regarding material in the topical report
- Promptly identify areas where additional information may be needed
- Facilitate discussions and continue effective communication

Based on the outcome of its discussions with EnergySolutions on the topics identified below, the NRC staff may develop formal requests for additional information to complete its review of the topical report.

1. The staff notes that in Part IV of the QAPD "Regulatory Commitments" within Section 1 "Regulatory Guides (RG)" EnergySolutions commits to the following RG:  
Regulatory Guide 1.87 (Draft Regulatory Guide DG-1436, Proposed Revision 3 to Regulatory Guide 1.87, issued December 2024), Acceptability of ASME Code Section III, Division 5, "High Temperature Reactors" Appendix A High Temperature Reactor Quality Group Classification  
**Issue** – The most recent revision of RG 1.87 is Revision 3 dated August 2025.  
**Information Need** – Clarify if you intend to update the QAPD to include the revision # and correct dates associated with this RG. If you don't intend to commit to the latest revision of this RG, explain the rationale for not committing to meeting the latest revision.
2. Criterion XI "Test Control" of Appendix B to 10 CFR Part 50 and SRP 17.5.K.4 "Test Control," state, "Test procedures shall include provisions for assuring that all prerequisites for the given test have been met, that adequate test instrumentation is available and used, and that the test is performed under suitable environmental conditions."  
**Issue** – EnergySolutions QAPD Section 11 "Test Control" does not include a requirement that test procedures shall include provisions that the test is performed under suitable environmental conditions.  
**Information Need** – Please reference this requirement in Section 11 of the QAPD or provide a justification for not referencing this requirement .

3. SRP 17.5.L.2 “Control of Measuring & Test Equipment” states that, “M&TE is labeled, tagged, or otherwise controlled to indicate its calibration status and to ensure its traceability to calibration test data.”

SRP 17.5.L.4 “Control of Measuring & Test Equipment” states that, “M&TE are calibrated, adjusted, and maintained at prescribed intervals or, prior to use, against certified equipment having known valid relationships to nationally recognized standards. If no nationally recognized standards exist, the bases for calibration are documented.

SRP 17.5.L.5 “Control of Measuring & Test Equipment” states that, “M&TE found out of calibration is tagged or segregated and not used until it is recalibrated. When M&TE is found out of calibration, an evaluation is made and documented of the validity of previous inspection or test results and of the acceptability of items previously inspected or tested. If any measuring or test equipment is consistently found out of calibration, it is repaired or replaced. A calibration is performed when the accuracy of the equipment is suspect.”

**Issue 1** – EnergySolutions QAPD Section 12 “Control of Measuring & Test Equipment” does not provide a requirement to ensure that M&TE is labeled, tagged, or otherwise controlled to indicate its calibration status or to ensure its traceability to calibration test data.

**Issue 2** – EnergySolutions QAPD Section 12 “Control of Measuring & Test Equipment” does not provide a requirement for M&TE being calibrated, adjusted or maintained at prescribed intervals prior to use, against certified equipment having known valid relationships to nationally recognized standards

**Issue 3** – EnergySolutions QAPD Section 12 “Control of Measuring & Test Equipment” does not provide a requirement for controls when M&TE is found out of calibration.

**Information need** – Please reference these requirements in Section 12 of the QAPD or provide a justification for not referencing these requirements.

4. QAPD Part II Section 13 “Handling, Storage, and Shipping” states that: In establishing provisions for handling, storage, and shipping, ES commits to compliance with NQA-1-2022, Requirement 13. ES also commits, during the construction of new nuclear plants, to compliance with the requirements of NQA-1-2022, Subpart 2.1, Subpart 2.2, Subpart 2.3, **Subpart 2.15** and Regulatory Position C.5 as stated in Regulatory Guide 1.28 Revision 6, September 2023, with the following clarifications and exceptions:

Subpart 2.2, Section 700 “Handling” 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.

**Issue** – NQA-1-2022 Subpart 2.15 “Quality Assurance Requirements for Hoisting, Rigging, and Transporting of Items for Nuclear Power Plants” states that subpart 2.15

has been replaced with ASME HRT-1–2016, “Rules for Hoisting, Rigging, and Transporting Equipment for Nuclear Facilities”

**Information need** – State if EnergySolutions intends to meet the controls included in ASME HRT-1-2016 for hoisting, rigging, and transport activities.

5. Criterion II of Appendix B to 10 CFR Part 50 states, in part, “The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.”

SRP Section 17.5, Subsection II.T, “Training and Qualification - Inspection and Test (Criterion II),” provides the training and qualification requirements for inspection and test personnel.

NQA-1-2022 Requirement 2 Section 302 “Inspection and Test” include specific requirements for personnel performing inspections and tests.

**Issue** - EnergySolutions QAPD Section 2.6, “Personnel Training and Qualifications,” does not provide a requirement for the training and qualification of inspection and test personnel.

**Information need** - Clarify how EnergySolutions QAPD addresses the training and qualification requirements for inspection and test personnel.

6. Part IV of the EnergySolutions QAPD provides a list and descriptions of RGs and quality assurance standards that EnergySolutions commits to conformance with. The NRC staff reviewed this list and finds that the list does not include commitment to the following two GLs listed in SRP Section 17.5, Section V and no exception, alternative or justification is provided for their absence:

- NRC GL 89-02 “Actions to Improve the Detection of Counterfeit and Fraudulently Marked Products” dated March 1989 (ML031140060)
- NRC GL 91-05 “Licensee Commercial-Grade Dedication Programs” dated April 1991 (ML031140508)

**Information need** – These two items are referenced on NQA-1-2022, Requirement 7, Section 700, and Subpart 2.14. Please provide a revised list of commitments to include applicable quality related GLs or provide a justification for any exception or alternative proposed in lieu of the criteria in the GLs.

7. SRP Section 17.5, Sections U.2.b and U.2.c specify requirements and reference Generic Letter (GL) 85-06 "Quality Assurance Guidance for ATWS Equipment that Is Not Safety Related," (ML031140390) and RG 1.155, "Station Blackout," for non-safety-related SSCs credited for ATWS and SBO respectively.

**Issue** – EnergySolutions QAPD Part III Section 2 "Non-Safety-Related SSCs Credited for Regulatory Events" does not include a reference to these NRC documents.

**Information need** – Clarify if EnergySolutions intends to commit to the GL and RG. If EnergySolutions doesn't intend to commit to this GL and RG, describe the reasons for not doing so.

8. SRP 17.5.O.4 "Nonconforming Materials, Parts, or Components" states that, Personnel performing evaluations to determine a disposition have demonstrated competence in the specific area they are evaluating, have an adequate understanding of the requirements, and have access to pertinent background information.

**Issue** – QAPD Section 15 "Nonconforming Materials, Parts, or Components" does not include a description of this requirement.

**Information need** – This requirement should be included as part of Section 15 "Nonconforming Materials, Parts, or Components" of the QAPD.