



Implementation of New Part 71 QAP Requirements

Jeremy Tapp
DSFM REG CON
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Introduction

- The purpose of this presentation is to provide an overview of the changes made to Part 71 with respect to Quality Assurance Programs (QAP) and clarification on implementation of the revised requirements.
- Stakeholder feedback is welcome and appreciated.

Agenda

- Background
- Part 71 Changes
- Part 71 Guidance
- Questions

NMSS

Division of Spent Fuel Management

Background

- 10 CFR Part 71 final rulemaking was issued June 12, 2015
- Effective date was July 13, 2015
- Update DOT and NRC regulations to harmonize with IAEA transportation requirements
- Part 71 QAP administrative procedures changes a subset of the overall rulemaking

Part 71 Changes

Applicable to Part 71 QAP approval holders

§ 71.38 Renewal of a certificate of compliance

- The title was revised to remove reference to QAP approvals
- Paragraphs (a), (b), and (c) were revised to remove reference to QAP approvals

Part 71 Changes

- There are no longer expiration dates for QAP approvals
- NRC Form 311 for QAP Approvals was revised to remove the expiration date block
- New Form 311s were mailed to all current QAP approval holders in August and September 2015

Part 71 Changes

§ 71.101 Quality assurance requirements

- Only editorial changes to remove references to “licensee” where not needed

§ 71.106 Changes to a quality assurance program

- New section added to establish requirements that will apply to changes to quality assurance programs

Part 71 Changes

§ 71.106 (a)

- Must submit to the NRC any changes determined to reduce commitments for prior review and approval

§ 71.106 (b)

- Allows QAP approval holders to make changes to previously approved programs without prior review and approval if the change is determined not to reduce commitments

Part 71 Changes

§ 71.106 (b) (cont.)

- Changes made that do not reduce commitments must be submitted to the NRC every 24 months
 - If no changes were made during the reporting period, the submittal is still required and would indicate no changes were made
- The 24 month reporting period starts on the date your revised Form 311 QAP approval was signed

Part 71 Changes

§ 71.106 (b) (cont.)

- Part 50 licensees may combine their Part 50 and Part 71 24 month QAP submittals on their current schedule
 - Add a reference to 71.106 and distribution per 71.1(a)

§ 71.106 (c)

- Shall maintain records of QAP changes

Part 71 Changes

§ 71.135 Quality assurance records

- Section revised to include those QA records that apply to changes made to previously approved QAPs
- Specifically, the second sentence of this section was revised to indicate the records must include changes to the QAP as required by the new § 71.106

Part 71 Guidance

- Reg Guide 7.10 was revised in June 2015 to include guidance on implementation of the new 71.106
 - Consider the need for working-level documents (procedures) for implementing changes to QAPs and performing required submittals
 - Changes to records documents should also be considered

Questions

