APPENDIX F
CHECKLIST FOR EVALUATING ACCEPTANCE OF QUALITY ASSURANCE ELEMENTS

F1. Organization – The organizational elements responsible for Quality Assurance (QA) are acceptable if:

1. The responsibility for the overall QA is retained and exercised by the applicant.

2. The applicant identifies and describes the major delegation of work involved in establishing and implementing its QA program or any part thereof to other organizations.

3. When major portions of the applicant's QA program are delegated:

   (1) The applicant describes how responsibility is exercised for overall QA. The extent of management supervision should be given, including the position location, qualifications, and criteria for determining the number of personnel performing these functions.

   (2) The applicant evaluates the performance of work by the delegated organization (method and frequency–once per year, although a longer cycle is acceptable with other evaluations of individual elements–are stated).

   (3) Qualified individuals or organizational elements are identified by position title within the applicant's organization as responsible for the quality of the delegated work before activities are started.

4. Clear management controls and effective lines of communication exist for QA activities among the applicant, contractors, and suppliers to ensure direction of QA.

5. Organizational charts clearly identify all the onsite and offsite organizational elements that function under the purview of QA (such as design, engineering, procurement, manufacturing, construction, inspection, testing, instrumentation, control, operation, and maintenance), the lines of responsibility, and the criteria for determining the size of the QA organization, including the inspection staff.

6. The applicant describes the QA responsibilities of each of the organizational elements noted on the organization charts.

7. The applicant identifies a management position that retains overall authority and responsibility for QA. This position may be filled by a person having the title "QA Manager" or other individual performing that function. This position has the following characteristics:

   (1) The position resides at least at the same organizational level as the position of the highest line manager directly responsible for performing activities that affect the quality/safety of facility operations (such as engineering,

procurement, construction, and operation) and is independent of operational restraints.

(2) The person in the position has effective communication channels with other senior management personnel.

(3) The person in the position has responsibility for approval of QA manuals.

8. Conformance to established requirements (except for designs) is verified by individuals or groups within the QA organization who do not have direct responsibility for performing the work being verified or by individuals or groups trained and qualified in QA concepts and practices who are independent of the organization responsible for performing the task.

9. Persons and organizations performing QA functions have sufficient access to management at a level necessary to ensure the capability to:

(1) Identify quality/safety problems;

(2) Initiate, recommend, or provide solutions through designated channels; and

(3) Verify implementation of solutions.

Positions with the above authority are identified by position title and a description of how the above actions are carried out is provided.

10. When work contributes to a situation adverse to safety and has to be stopped, the following provisions apply:

(1) Designated QA personnel, sufficiently free from direct pressures resulting from operational concerns, have the responsibility, delineated in writing, to stop work in unsafe situations and to control further operations until the conditions that created the unsafe condition are corrected.

(2) The organizational positions with stop-work authority are identified.

11. Provisions are established for the resolution of disputes involving quality of items relied on for safety arising from a difference of opinion between QA personnel and personnel from other departments (engineering, procurement, manufacturing, etc.).

12. Designated QA individuals are involved in day-to-day activities relied on for safety of facility conditions and operations. QA staff members routinely attend and participate in status meetings to ensure that they are kept abreast of day-to-day activities and that there is adequate QA coverage of those activities.

13. Policies regarding the implementation of QA are documented and made mandatory. These policies are established at the facility management or corporate level.

14. The position description ensures that the individual directly responsible for the definition, direction, and effectiveness of overall QA has sufficient authority to effectively implement responsibilities. This position is to be sufficiently free from operational responsibilities to ensure independence of action. Qualification requirements for this individual are established in a position description that includes the following prerequisites:

    (1) Management experience through assignments to responsible positions;

    (2) Knowledge of QA regulations, policies, practices, and standards; and

    (3) Experience in performing QA or QA-related activities in design, construction, or operation in a fuel cycle plant, a power reactor, a low-level waste facility, or in a similar high-technology industry.

15. The person responsible for onsite QA is identified by position and has the appropriate organizational position, responsibilities, and authority to exercise proper control over QA. The duties of this individual are structured such that adequate attention can be given to ensuring that QA at the plant site is being effectively implemented.

Additional guidance for organization is given in SRP Section 4.0, "Organization and Administration."

F2. QA Function – The QA function for items relied on for safety is acceptable if:

1. The scope of QA includes:

    (1) A commitment that activities affecting the quality of design, construction, and operation will be subject to the applicable controls of QA. Activities covered by QA are identified on QA-defining documents.

    (2) A commitment that any test program for items relied on for safety will be conducted with QA controls and a description of how QA will be applied.

    (3) A commitment that computer programs for functions related to safety will be procured/developed, modified, maintained, and used in accordance with QA controls and a description of how QA will be applied.

    (4) A commitment that special items, environmental conditions, skills, or processes will be provided as necessary to ensure the quality of activities having an effect on safety.

2. A brief summary of the applicant's corporate QA policies is given.

3. The following provisions are established to ensure that quality-affecting procedures required to implement QA are consistent with QA commitments and corporate policies and are properly documented, controlled, and made mandatory through a policy statement or equivalent document signed by the responsible official:

   (1) The QA organization reviews and documents concurrence in the quality-affecting procedures.

   (2) The organizational group or individual responsible for the policy statement is identified.

   (3) The quality-affecting procedural controls of the principal contractors are provided for the applicant's review with documented agreement of acceptance before the initiation of activities relied on for safety.

4. Provisions are included for notifying the NRC of changes in the implementation of QA from that described in the application.

5. The QA organization and the necessary technical organizations participate early in the QA definition stage to determine and identify QA controls and the extent to which they are to be applied to items as they relate to safety. This effort may involve applying a defined, graded approach to the items in accordance with their importance to safety.

6. A description is provided that emphasizes how the detailed QA will be properly implemented and carried out.

7. A description is provided of how management (above or outside the QA organization) regularly assesses the scope, status, adequacy, and compliance of QA. These measures should include:

   (1) Frequent appraisals of QA status through reports, meetings, audits and/or self assessments;

   (2) Performance of an annual, preplanned, and documented assessment; and

   (3) Identification and tracking of corrective actions based on assessment findings.

8. Activities which are items relied on for safety (such as design, procurement, and site investigation) initiated prior to formal NRC acceptance of the QA program are controlled by a QA program in accordance with this SRP section. Approved procedures and appropriately trained personnel should be available to implement the applicable portion of the QA program prior to the initiation of the activity.

9. A summary description is provided on how responsibilities and control of quality-affecting activities are transferred from the principal contractors to the applicant as the design and construction phase is completed.

10. Indoctrination, training, and qualification[1] are established so that:

    (1) Personnel responsible for performing and verifying activities affecting quality are instructed as to the purpose, scope, and implementation of the applicable manuals, instructions, and procedures.

    (2) Personnel performing and verifying activities affecting safety and/or quality are trained and qualified in the principles, techniques, and requirements of the activity being performed.

    (3) For formal training and qualification, documentation includes a statement of the training objective and its content, the attendees, and the date of attendance.

    (4) Proficiency tests are given to those personnel performing and verifying activities affecting quality, and acceptance criteria are developed to determine if individuals are properly trained and qualified.

    (5) The certificate of qualifications clearly delineates the specific functions personnel are qualified to perform and the criteria used to qualify personnel in each function.

    (6) Proficiency of personnel performing and verifying activities affecting safety/quality is maintained by retraining, reexamining, and/or recertifying, as determined by management or program commitment.

11. The applicant's ISA is developed and maintained under QA controls.

F3. Design Control[2] – Control of the design of items relied on for safety is acceptable if:

1. The scope of design control includes design activities associated with the preparation and review of design documents, including the correct translation of applicable regulatory safety requirements and associated design bases into design, procurement, and procedural documents.

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[1] Guidance for training and qualification of plant personnel is given in SRP Section 15.4.

[2] Guidance for configuration management is given in SRP Section 15.2.

2. Organizational responsibilities are described for preparing, reviewing, approving, and verifying design documents related to an item or its processes, such as system descriptions, design input and criteria, design drawings, design analyses, computer programs, specifications, and procedures.

3. Organizational responsibilities are described for planning and conducting site characterization, including reviewing, approving, and verifying analyses and conclusions.

4. Errors and deficiencies in approved design documents, including design methods (such as computer codes) that could adversely affect the performance of items and processes are documented, and action is taken to ensure that all errors and deficiencies are corrected.

5. Deviations from specified quality standards are identified, and procedures are established to ensure their control.

6. Internal and external design interface controls, procedures, and lines of communication among participating design organizations and across technical disciplines are established and described for the review, approval, release, distribution, and revision of documents involving design interfaces to ensure that items are compatible geometrically and functionally.

7. Procedures are established and described requiring documented verification of the dimensional accuracy and completeness of design drawings and specifications.

8. Procedures are established and described requiring that design drawings and specifications for items relied on for safety be reviewed by the QA organization to ensure that the documents are prepared, reviewed, and approved in accordance with company procedures and that the documents contain necessary QA requirements, such as inspection and test requirements, acceptance requirements, and those pertaining to the extent of documenting inspection and test results. These reviews are documented.

9. Guidelines or criteria are established and described for determining the method of design verification (design review, alternate calculations, or tests).

10. Procedures are established and described for design verification activities that ensure the following:

    (1) The verifier is qualified, and neither the verifier nor the verifier’s immediate supervisor is directly responsible for the design. In exceptional circumstances, the designer's immediate supervisor may perform the verification provided:

        (a) The supervisor is the only technically qualified individual;

(b) The need is individually documented and approved in advance by the supervisor's management; and

(c) QA audits and self assessments cover frequency and effectiveness of the use of supervisors as design verifiers to guard against abuse.

(2) Design verification is completed before release of procurement, manufacturing, or construction to another organization for use in other design activities. When this schedule cannot be met, the design verification may be deferred, provided the justification for this action is documented and the unverified portion of the design output document and all design output documents, based on the unverified data, are appropriately identified and controlled. Construction site activities associated with a design or design change should not proceed without verification past the point where the installation would become irreversible (i.e., require extensive demolition and rework).

(3) Procedural control is established for design documents that reflect the commitments of the application for construction approval and license application for operations. Procedural control differentiates between documents that undergo formal design verification by interdisciplinary or multi-organizational teams and those that can be reviewed by a single individual (a signature and date are acceptable documentation for personnel certification). Design documents that pertain to plant safety and are subject to procedural control include, but are not limited to, specifications, calculations, computer programs, system descriptions, and drawings (including flow diagrams, piping and instrument diagrams, control logic diagrams, electrical single-line diagrams, diagrams of structural systems for major facilities, site arrangements, and equipment locations). Specialized reviews should be used when uniqueness or special design considerations warrant them.

(4) The responsibilities of the verifier, the areas and features to be verified, the pertinent considerations to be verified, and the extent of documentation are identified in procedures.

11. The following provisions are included if the verification method is only by test:

(1) Procedures provide criteria that specify when verification should be by test.

(2) Prototype, component, or feature testing is performed as early as possible before installation of plant items or before the installation would become irreversible.

(3) Verification by test is performed under conditions that simulate the most adverse design conditions as determined by analysis.

12. Procedures are established to ensure that verified computer codes are certified for use and that their use is specified.

13. Design and specification changes, including field changes, are subject to the same design controls that were applicable to the original design.

F4. Procurement Document Control – Control of procurement documents for the procurement of items relied on for safety is acceptable if:

1. Procedures are established for the review of procurement documents to determine that quality requirements are correctly stated, are inspectable, and are controllable; that there are adequate acceptance and rejection criteria; and that procurement documents have been prepared, reviewed, and approved in accordance with QA requirements. To the extent necessary, procurement documents should require that contractors and subcontractors provide acceptable QA. The review and documented concurrence of the adequacy of quality requirements stated in procurement documents are performed by independent personnel trained and qualified in QA practices and concepts.

2. Procedures are established to ensure that procurement documents identify applicable regulatory, technical, administrative, and reporting requirements; drawings; specifications; codes or industry standards; inspection and test requirements; and special process instructions that must be met by suppliers.

3. Organizational responsibilities are described for procurement planning; the preparation, review, approval, and control of procurement documents; supplier selection; bid evaluations; and the review of and concurrence with supplier QA before initiation of activities relied on for safety. The involvement of the QA organization is described.

F5. Instructions, Procedures,[3] and Drawings – Activities related to instructions, procedures, and drawings pertaining to items relied on for safety are acceptable if:

1. Organizational responsibilities are described for ensuring that activities affecting the quality of items relied on for safety are prescribed by documented instructions, procedures, and drawings and accomplished through implementation of these documents.

2. Procedures are established to ensure that instructions, procedures, and drawings that could affect safety include quantitative acceptance criteria (such as those

[3] Guidance for plant procedures is given in SRP Section 15.5.

pertaining to dimensions, tolerances, and operating limits) for determining that activities relied on for the safety of plant operations have been satisfactorily performed.

F6. Document Control – Control of documents related to items relied on for safety is acceptable if:

1. The scope of document control is described and the types of controlled documents are identified. As a minimum, controlled documents include:

   (1) Design documents (e.g., calculations, drawings, specifications, and analyses), including documents related to computer codes;

   (2) Procurement documents;

   (3) Instructions and procedures for such activities as fabrication, construction, modification, installation, maintenance, testing, and inspection;

   (4) Documents pertaining to as-built conditions;

   (5) QA and quality control manuals, procedures, and reports; and

   (6) Technical reports.

2. Procedures for the review, approval, and issuance of documents and changes thereto are established and described to ensure technical adequacy and inclusion of appropriate safety/quality requirements before implementation. The QA organization, or an individual other than the person who generated the document but who is qualified in QA, reviews and concurs with these documents in regard to QA-related aspects.

3. Procedures are established to ensure that changes to documents are reviewed and approved by the same organizations as those that performed the initial review and approval or by other qualified, responsible organizations delegated by the applicant.

4. Before commencing work, procedures are established to ensure that documents are available at the location where the activity will be performed.

5. Procedures are established and described to ensure that obsolete or superseded documents are removed and replaced by applicable revisions in work areas in a timely manner.

6. A master list or equivalent document control system is established to identify the current revision of instructions, procedures, specifications, drawings, and procurement documents. When such a list is used, it should be updated and distributed to predetermined responsible personnel.

7. Procedures are established and described to provide for the preparation of drawings pertaining to as-built conditions and related documentation in a timely manner to accurately reflect the actual design.

F7. Control of Purchased Items – Control of purchased items relied on for safety is acceptable if:

1. Organizational responsibilities are described for the control of purchased items including interactions between design, procurement, and QA organizations.

2. Verification of suppliers' activities during fabrication, inspection, testing, and shipment of items relied on for safety is planned and performed with QA organization participation in accordance with written procedures to ensure conformance to the purchase order requirements. The procedures, as applicable to the method of procurement, provide for:

   (1) The specification of the characteristics or processes to be witnessed, inspected, or otherwise verified; the method of verification and the required documentation; and the personnel responsible for implementing these procedures; and

   (2) Audits, surveillances, or inspections that ensure that the supplier complies with the quality requirements.

3. Procurement of spare or replacement parts for items relied on for safety is subject to QA controls, to codes or standards, and to technical requirements equal to or better than the original technical requirements, or as required to prevent the procurement of defective items.

4. Selection of suppliers is documented and filed.

5. Items are inspected when received to ensure:

   (1) The item is properly identified and corresponds to the identification on the purchase document and the documentation when the item is received.

   (2) The item and acceptance records satisfy the inspection instructions before installation or use of the item.

   (3) Specified inspection, test, and other records (such as certificates of conformance attesting that the item conforms to specified requirements) are available at the facility before installation or use of the item.

6. Items accepted and released are identified as to their inspection status before they are forwarded to a controlled storage area or are released for installation or further work.

7. The supplier furnishes the following records to the purchaser:

   (1) Documentation that identifies the purchased item and the specific procurement requirements (e.g., codes, standards, and specifications) met by the item relied on for safety;

   (2) Documentation that identifies any procurement requirements that have not been met; and

   (3) A description of those items that do not conform to the procurement requirements and that are designated "accept as is" or "repair."

The procedure for review and acceptance of these documents is described.

8. For commercial "off-the-shelf" items where specific QA controls cannot be imposed in a practicable manner, special quality verification requirements are established and described to ensure that an acceptable item has been received by the purchaser.

9. Suppliers' certificates of conformance are periodically evaluated by audits, independent inspections, or tests to ensure that they are valid and that the results are documented.

F8. Identification and Control of Items – Identification and control of items relied on for safety are acceptable if:

1. Controls are established and described to identify and control items relied on for safety. The description should include organizational responsibilities.

2. Procedures are established that ensure that identification is maintained either on the item relied on for safety or on records traceable to the item, to preclude use of incorrect or defective items.

3. Identification of items relied on for safety can be traced to the appropriate documentation such as drawings, specifications, purchase orders, manufacturing and inspection documents, deviation reports, and physical and chemical test reports.

4. Correct identification of items is verified and documented before they are released for fabrication, assembling, shipping, and installation.

F9. Control of Special Processes – Control of special processes related to items relied on for safety is acceptable if:

1. Organizational responsibilities, including those for the QA organization, are described for the qualification of special processes, equipment, and personnel.

2. Procedures are established for recording evidence of an acceptable level of quality for special processes, using qualified procedures, equipment, and personnel.

3. Qualification records of procedures, equipment, and personnel associated with special processes are established, filed, and kept current.

F10. Inspection – Inspection of items relied on for plant or process safety is acceptable if:

1. The scope of inspection indicates that an effective inspection program has been established. Procedures provide criteria for determining the accuracy requirements of inspection equipment and criteria for determining when inspections are required or for defining how and when inspections are performed. The QA organization participates in these functions.

2. Organizational responsibilities for inspection are described. Individuals performing inspections are other than those who performed or directly supervised the item/activity being inspected and do not report directly to the immediate supervisors who are responsible for the item/activity being inspected. If the individuals performing inspections are not part of the QA organization, the inspection procedures, personnel qualification criteria, and independence from undue pressure, such as operational needs, should be reviewed and found acceptable by the QA organization before the initiation of the activity.

3. A qualification plan for inspectors is established and documented and the qualifications and certifications of inspectors are kept current.

4. Inspection procedures, instructions, or checklists provide for the following:

   (1) Identification of characteristics and activities to be inspected;

   (2) A description of the method of inspection;

   (3) Identification of the individuals or groups responsible for performing the inspection in accordance with the provisions of Item 10.b in this section;

   (4) Acceptance and rejection criteria;

   (5) Identification of required procedures, drawings, and specifications and revisions;

(6) Identification of inspection personnel, measuring and test equipment used (including any data recorders), and the results of the inspection; and

(7) Specification of the necessary measuring and test equipment, including accuracy requirements.

5. Inspection results are documented and evaluated and their acceptability is determined by a responsible individual or group.

F11. Test Control – Control of tests of items relied on for safety is acceptable if:

1. The description of the scope of test control indicates that an effective test program has been established for tests, including proof tests before installation and pre-operational tests. Procedures provide criteria for determining the accuracy requirements of test equipment and provide criteria for determining when a test is required or how and when testing activities should be performed.

2. Test procedures or instructions provide, as required, for the following:

(1) The requirements and acceptance limits in applicable design and procurement documents;

(2) Instructions for performing the test;

(3) Test prerequisites such as calibrated instrumentation, adequate test equipment and instrumentation, including their accuracy requirements, completeness of items to be tested, suitable and controlled environmental conditions, and provisions for data collection and storage;

(4) Test acceptance and rejection criteria,

(5) Mandatory inspection hold points for witness by owner, contractor, or inspector (as applicable);

(6) Methods of documenting or recording test data and results; and

(7) Provisions for ensuring that test prerequisites have been met.

3. Test results are documented and evaluated and their acceptability is determined by a responsible individual or group.

4. A qualification plan is established and documented for those individuals conducting the tests and certifications for those individuals performing the tests are kept current.

F12. Control of Measuring and Test Equipment – Control of measuring and test equipment (such as instruments, tools, gauges, fixtures, reference and transfer standards, and nondestructive test equipment) identified as items relied on for safety or used to measure or test other items relied on for safety is acceptable if:

1. The scope for the control of measuring and test equipment is described, along with the types of equipment to be controlled. This information indicates that effective calibrations and adjustments have been established.

2. QA and other organizations' responsibilities are described for establishing, implementing, and ensuring the effectiveness of the calibrations and adjustments.

3. Procedures are established and described for calibration (technique and frequency), maintenance, and control of measuring and test equipment. The review of and documented concurrence with these procedures are described and the organization responsible for these functions is identified.

4. Measuring and test equipment is identified and traceable to the calibration data.

5. Measuring and test equipment is labeled, tagged, or "otherwise controlled" to indicate the due date of the next calibration. The method to "otherwise control" measuring and test equipment should be described.

6. Measuring and test equipment is calibrated at specified intervals on the basis of the required accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurement. The test equipment should have sufficient accuracy to ensure that the equipment being calibrated is within required tolerance, and the basis of acceptance is documented and authorized by responsible management. The management authorized to perform this function is identified.

7. Calibrating standards have greater accuracy than standards being calibrated. Calibrating standards with the same accuracy may be used if they can be shown to be adequate to meet the requirements, and the basis of acceptance is documented and authorized by a responsible member of the management staff. The management staff member authorized to perform this function is documented.

8. Reference and transfer standards are traceable to nationally recognized standards; where national standards do not exist, provisions are established to document the basis for calibration.

9. Measurements are taken and documented to determine the validity of previous inspections and the acceptability of items inspected or tested since the last calibration when measuring and test equipment is found to be out of calibration. Inspections or tests are repeated on items determined to be suspect.

F13. Handling, Storage, and Shipping – Handling, storage, and shipping of items relied on for safety are acceptable if:

1. Special handling, preservation, storage, cleaning, packaging, and shipping requirements are established and implemented by suitably trained individuals in accordance with predetermined work and inspection instructions.

2. Procedures are established and described to control the cleaning, handling, storage, packaging, and shipping of items in accordance with design and procedure requirements.

F14. Inspection, Test, and Operating Status – Inspection, test, and operating status of items relied on for safety are acceptable if:

1. Procedures are established to indicate the inspection, test, and operating status of items.

2. Procedures are established and described to control the application and removal of inspection and welding stamps and status indicators such as tags, markings, labels, and stamps.

3. Procedures are established and described to control the alteration of the sequence of required tests, inspections, and other operations relied on for safety. Such actions should be subject to the same controls as those for the original review and approval.

4. The status of nonconforming, inoperative, or malfunctioning items and processes is documented and identified to prevent inadvertent use. The organization responsible for this function is identified.

F15. Nonconforming Items – Control of nonconforming items relied on for safety is acceptable if:

1. Procedures are established and described for the identification, documentation, segregation, review, disposition, and notification to affected organizations of nonconforming items (including computer codes) if disposition is other than to scrap. The procedures identify authorized individuals responsible for the independent review of nonconforming items, including their disposition and closeout.

2. QA and other organizational responsibilities are described for the definition and implementation of activities related to nonconformance control. This includes identifying those individuals or groups with authority for the disposition of nonconformance.

3. Documentation identifies the nonconforming item; describes the nonconformance, the disposition of the nonconforming item, and the inspection requirements; and includes signature approval of the disposition. Nonconformances are corrected or resolved before the initiation of preoperational testing of the item.

4. Reworked, repaired, and replacement items are inspected and tested in accordance with the original inspection and test requirements or acceptable alternatives.

5. Nonconformance reports are periodically analyzed by the QA organization to show quality trends, and the significant results are reported to upper management for review and assessment.

F16. Corrective Action – Corrective actions that affect or support items relied on for safety are acceptable if:

1. Procedures are established and described indicating that effective corrective actions have been established. The QA organization reviews and documents concurrence with the procedures.

2. Corrective action is documented and initiated after the determination of a condition adverse to safety/quality (e.g., nonconformance, failure, malfunction, deficiency, deviation, defective item, a failure to follow operating procedures, or a human error) to preclude recurrence. The QA organization concurrence is required regarding the adequacy of the corrective action.

3. Follow-up action is taken by the QA organization to verify proper implementation of corrective action and to close out the corrective action in a timely manner.

4. Significant conditions adverse to safety, the root cause of the conditions, and the corrective action taken to preclude repetition are documented and reported to immediate management and upper levels of management for review and assessment.

F17. QA Records[4] – Control of QA records is acceptable if:

1. QA and other organizations are identified and their responsibilities are described for the definition and implementation of QA records.

2. Inspection and test records contain the following, where applicable:

   (1) A description of the type of observation;

   (2) The date and results of the inspection or test;

[4] Additional guidance for records management is given in SRP Section 15.8.

(3) Information on conditions adverse to quality;

(4) Identification of the inspector or data recorder;

(5) Evidence as to the acceptability of the results; and

(6) Action taken to resolve any discrepancies noted.

3. Suitable facilities for the storage of the records are described.

F18. Audits and Assessments – Guidance for audits and assessments is given in SRP Section 15.6.

F19. Applicant's Provisions for Continuing QA – The applicant's provisions for continuing QA are acceptable if the submittal addresses reviews and updates based on reorganizations, revised activities, lessons learned, changes to applicable regulations, and other QA changes that should be reflected in the license application's QA program description to keep it current.