

From: Robert Clark
To: Mark Flaherty
Date: 4/12/02 2:34PM
Subject: Ginna Revised QA Program

This e-mail conveys issues to be discussed in a future conference call (Monday 4/15/02). It does not state a formal NRC staff position, and does not formally request for additional information. Disposition of issues described in this e-mail will be discussed in the conference call.

QA Issues:

1. The compensatory actions should be implemented in conformance with your Appendix B quality assurance program. With respect to compensatory actions, discuss the following:
 - a. How the compensatory actions conform with your corrective action program, including provisions for cause determination, recurrence control, documentation, and reporting of significant conditions to appropriate levels of management.
 - b. How procurement documents are revised to reflect actions which compensate for deficiencies in a supplier's quality assurance program.
 - c. Provisions for revising vendor documents (e.g., design documents, vendor manuals) to reflect compensatory actions.
2. Records of audits are generated and retained as quality assurance records. Compensatory actions taken to resolve deficiencies in a supplier's quality assurance program should be retained as part of the audit record. Discuss the provisions that will ensure that a complete audit record is retained, including documentation of compensatory actions.
3. The proposed alternative compensates for a supplier's "failure to comply." Describe the audit process for reinspecting areas of noncompliance, with specific reference to ANSI N45.2.12, section 4.3.2.7 and Regulatory Guide 1.144, section 4.b.
4. The proposed alternative should be revised to address timeliness requirements and inclusion of completed compensatory actions in the followup report.

cc: Thomas Harding

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From: Robert Clark

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