

ENCLOSURE 2

NUCLEAR MANAGEMENT COMPANY

DUANE ARNOLD ENERGY CENTER

DOCKET 50-331

KEWAUNEE NUCLEAR POWER PLANT

DOCKET 50-305

MONTICELLO NUCLEAR GENERATING PLANT

DOCKET 50-263

PALISADES NUCLEAR PLANT

DOCKET 50-255

POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

DOCKETS 50-266 AND 50-301

PRAIRIE ISLAND NUCLEAR GENERATING PLANT UNITS 1 AND 2

DOCKETS 50-282 AND 50-306

October 31, 2003

**EXISTING SITE QA PROGRAMS VS QATR
COMPARISON MATRICES**

77 Pages Follow

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QA Program Comparison Matrix
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Ref: UFSAR 17.2 – “Quality Assurance During the Operations Phase” Rev. 29 4/18/03
NMC QATR [Rev. 0a, October 10, 2003]

Current QAPD Section / (paragraph)	QATR Section / (paragraph)	Δ's	R/N/I (Note 1)	Basis for Reduction in Commitment Meeting Appendix B
17.2.0.1(1)	Policy (1)	Note 2	N	
17.2.0.1(2)	A.7.1	The QATR has not been approved by the NRC for activities covered by 10 CFR 71. The QATR was developed to meet 10 CFR 71 Subpart H. This QATR is being submitted to the NRC for approval for 10 CFR 71 applications along with its approval for 10 CFR 50 applications.	N	
17.2.0.1(3)	A.7.1	The QATR has not been approved by the NRC for activities covered by 10 CFR 72. The QATR was developed to meet 10 CFR 72 Subpart G. This QATR is being submitted to the NRC for approval for 10 CFR 72 applications along with its approval for 10 CFR 50 applications.	N	
17.2.0.1(4)	N/A	This paragraph discusses the quality assurance program required for the characterization and classification of radioactive waste being shipped to a disposal site.	R	This is not required by 10CFR50 Appendix B. Therefore, this does not degrade the DAEC Quality Assurance Program. This paragraph was added since the last NRC review to provide the site with additional information. Since this was not in the last NRC reviewed version, removing this paragraph is not a reduction in commitment.
17.2.0.1(5)	A.7.1	Note 2	N	
17.2.0.1(6)	A.4 (1)	The QATR does not differentiate between the nuclear power plant and the spent fuel storage installation. Both are covered under the QATR.	N	
17.2.0.1(7)	A.1 (2)	Note 2	N	
17.2.0.1(8)	Policy 1	Note 2	N	
17.2.0.2(1)	N/A	This explanation is not required in the QATR.	N	
17.2.0.2(2)	Policy 2	Note 2	N	
17.2.0.2(3)	A.1 (1)	Note 2	N	
17.2.0.2(4)	Policy 1	Note 2	N	

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17.2.1.1(1)	A.2 (2)	Note 2	N	
17.2.1.1(2)	A.2 (1)	Note 2. The information contained in UFSAR Section 13.1 will remain in that section.	N	
17.2.1.2	A.2.1.2.b.1	Note 2	N	
17.2.1.3(1)	A.2.1.2.b.1	Responsibility for the Operational Quality Assurance Program and the Nuclear Oversight Department implementing procedures is assigned to the Director, Nuclear Oversight in the QATR. Transfer of responsibility is not viewed as a reduction in commitment.	N	
17.2.1.3(2)	A.2.2.1.e	Note 2	N	
17.2.1.3(3)	N/A	Note 4		
17.2.1.3(4)	N/A	Note 4		
17.2.1.3(5)	A.2.2.1.e Figure #2	Note 2	N	
17.2.1.3.1	A.2.2.1.e	Note 2	N	
17.2.1.4	A.2.1.2.b.1	Responsibility for supplier assessment has been assigned to the Director, Nuclear Oversight in the QATR. Transfer of responsibility is not viewed as a reduction in commitment.	N	
17.2.2.1(1)	A.1 (3)	Note 2 – Definition of safety related structures, systems and components is not in the QATR. Basis for deciding what SSCs the QATR applies to is provided.	N	
17.2.2.1(2)	A.1 (4)	Note 2	N	
17.2.2.2(1)	A.7.1 A.7.3	Note 2	N	
17.2.2.2(2)	A.7.3	Note 2	N	
17.2.2.3.1(1)	A.1 (4)	Note 2	N	
17.2.2.3.1(2)	A.1 (4)	Note 2	N	
17.2.2.3.2	A.1 (4)	Note 2	N	
17.2.2.4(1)	A.7.1	Note 2	N	
17.2.2.4(2)	A.1 (3)	Note 2 – The QATR does not mention “department instructions” specifically. The QATR term “site procedures” covers all instructions and procedures unique to a site.	N	

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17.2.2.4.1	A.1 (3)	Note 2	N	
17.2.2.4.2	A.1 (3)	Note 2	N	
17.2.2.4.3	A.1 (3)	Note 2	N	
17.2.2.4.4	A.1 (3)	Note 2 – The QATR does not mention “department instructions” specifically. The QATR term “site procedures” covers all instructions and procedures unique to a site.	N	
17.2.2.5	A.1 (1)	Note 2	N	
17.2.2.6(1)	A.5	Note 2	N	
17.2.2.6(2)	N/A	Note 3	N	
17.2.2.6(3)	N/A	Note 3	N	
17.2.2.6(4)	N/A	Note 3	N	
17.2.2.6(5)	N/A	Note 3	N	
17.2.2.6(6)	N/A	Note 3	N	
17.2.2.7(1)	C.3 (1) C.3 (2) C.3 (3)	Note 2	N	
17.2.2.7(2)	C.3 (3)	Note 2	N	
17.2.3.1(1)	B.2 (1)	Note 2	N	
17.2.3.1(2)	B.2 (1)	Note 2	N	
17.2.3.1(3)	B.2 (1)	Note 2	N	
17.2.3.2	N/A	Note 4	N	
17.2.3.3	B.2 (5)	Note 2	N	
17.2.3.4(1)	B.2 (5)	Note 2	N	
17.2.3.4(2)	B.2 (5)	Note 2	N	
17.2.3.4(3)	B.2 (5)	Note 2	N	
17.2.3.5	B.2 (5)	Note 2	N	
17.2.3.6(1)	B.3 (1)	Note 2	N	
17.2.3.6(2)	B.3 (5)	Note 2	N	
17.2.3.6(3)	B.3 (4)	Note 2	N	
17.2.3.6(4)	B.3 (3)	Note 2	N	
17.2.3.6(5)	B.3 (4)	Note 2	N	
17.2.3.6(6)	B.3 (4)	Note 2	N	
17.2.3.6(7)	B.3 (4)	Note 2	N	
17.2.3.6(8)	B.3 (4)	Note 2	N	
17.2.3.6.1(1)	B.3 (4)	Note 2	N	

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17.2.3.6.1(2)	B.3 (4)	Note 2	N	
17.2.3.6.2	B.3 (4)	Note 2	N	
17.2.3.6.3(1)	B.3 (4)	Note 2	N	
17.2.3.6.3(2)	B.3 (4)	Note 2	N	
17.2.3.7(1)	B.3 (4)	Note 2	N	
17.2.3.7(2)	N/A	Note 3	N	
17.2.3.8	Appendix A Appendix B	Note 2	N	
17.2.4.1	B.4 (1)	Note 2	N	
17.2.4.2	N/A	Note 4	N	
17.2.4.3	B.4 (1) B.4 (2)	Note 2	N	
17.2.4.4	B.4 (2) B.7 (1)	Note 2	N	
17.2.4.5	N/A	Note 3	N	
17.2.5.1	B.14 (1)	Note 2	N	
17.2.5.2(1)	B.14 (1)	Note 2	N	
17.2.5.2(2)	B.14 (1)	Note 2	N	
17.2.5.2(3)	N/A	Note 3	N	
17.2.5.3	B.14 (1)	Note 2	N	
17.2.6.1	B.14 (2)	Note 2	N	
17.2.6.2	B.14 (1) B.14 (2)	Note 2	N	
17.2.6.3(1)	B.14 (1) B.14 (2)	Note 2	N	
17.2.6.3(2)	B.14 (1) B.14 (2)	Note 2	N	
17.2.6.4(1)	N/A	Note 3	N	
17.2.6.4(2)	N/A	Note 3	N	
17.2.6.4(3)	N/A	Note 3	N	
17.2.6.4(4)	N/A	Note 3	N	
17.2.6.4(5)	N/A	Note 3	N	
17.2.6.5(1)	B.14 (2)	Note 2	N	
17.2.6.5(2)	N/A	Note 3	N	
17.2.6.5(3)	B.14 (2)	Note 2	N	

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17.2.7.1	B.6 (1) B.5 (1)	Note 2	N	
17.2.7.2(1)	B.4 (2)	Note 2	N	
17.2.7.2(2)	B.4 (2)	Note 2	N	
17.2.7.2(3)	B.4 (2)	Note 2	N	
17.2.7.2(4)	N/A	Note 3	N	
17.2.7.3(1)	B.4 (2)	Note 2	N	
17.2.7.3(2)	B.4 (2)	Note 2	N	
17.2.7.3(3)	B.4 (2)	Note 2	N	
17.2.7.3(4)	B.4 (2)	Note 2	N	
17.2.7.3(5)	B.4 (2)	Note 2	N	
17.2.7.4(1)	B.4 (2)	Note 2	N	
17.2.7.4(2)	B.4 (2)	Note 2	N	
17.2.7.4(3)	B.4 (2)	Note 2	N	
17.2.7.4(4)	B.4 (2)	Note 2	N	
17.2.7.5	B.4 (2)	Note 2	N	
17.2.8.1(1)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.1(2)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.1(3)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.1(4)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.2(1)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.2(2)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.2(3)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.2(4)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.2(5)	B.4 (2)	Note 2	N	
17.2.8.2(6)	B.6 (1) B.6 (2)	Note 2	N	

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17.2.8.2(7)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.2(8)	N/A	Note 3	N	
17.2.8.3(1)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.3(2)	B.6 (1) B.6 (2)	Note 2	N	
17.2.8.3(3)	B.6 (1) B.6 (2)	Note 2	N	
17.2.9.1(1)	B.11 (1)	Note 2	N	
17.2.9.1(2)	N/A	Note 4	N	
17.2.9.2(1)	B.11 (1)	Note 2	N	
17.2.9.2(2)	B.11 (2)	Note 2	N	
17.2.9.2(3)	N/A	Note 3. This paragraph describes how we are implementing NQA-1 Supplement 9S-1 Sections 2, 3, 3.1.2 and 3.2.	N	
17.2.9.2(4)	B.11 (2)	Note 2	N	
17.2.9.2(5)	B.11 (2)	Note 2	N	
17.2.9.2(6)	B.11 (2)	Note 2	N	
17.2.9.2(7)	B.11 (2)	Note 2	N	
17.2.9.3(1)	B.11 (2)	Note 2	N	
17.2.9.3(2)	A.5	Note 2, Note 4	N	
17.2.9.4(1)	B.14 (1)	Note 2	N	
17.2.9.4(2)	B.5 (1)	Note 2, Note 4	N	
17.2.9.4(3)	N/A	Note 3	N	
17.2.9.5	A.7.3	Note 2 – The definition of Special Processes in the QATR encompasses coatings. This section will be moved to UFSAR Section 1.8 via CAP 28651.	N	
17.2.10.1(1)	B.12 (1)	Note 2	N	
17.2.10.1(2)	N/A	Note 4	N	
17.2.10.2(1)	B.14 (1)	Note 2	N	
17.2.10.2(2)	B.12	Note 2	N	
17.2.10.2(3)	B.12	Note 2	N	
17.2.10.2(4)	B.12	Note 2	N	
17.2.10.2(5)	B.12	Note 2	N	

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17.2.10.2(6)	B.12	Note 2	N	
17.2.10.3(1)	B.12	Note 2	N	
17.2.10.3(2)	B.12	Note 2	N	
17.2.10.4(1)	B.12	Note 2	N	
17.2.10.4(2)	B.12 A.7.2	Note 2	N	
17.2.10.4(3)	B.14 (1)	Note 2	N	
17.2.10.4.1(1)	N/A	Note 3 – This paragraph describes how we are implementing the ASME Boiler and Pressure Vessel Code and code Quality Assurance Requirements (A.7.2).	N	
17.2.10.4.1(2)	N/A	Note 4	N	
17.2.10.4.2	B.8	Note 2	N	
17.2.10.5	B.12	Note 2	N	
17.2.10.6	B.12	Note 2	N	
17.2.11.1	B.8 (1)	Note 2	N	
17.2.11.2(1)	B.8 (1)	Note 2	N	
17.2.11.2(2)	B.8 (1)	Note 2	N	
17.2.11.3	B.8 (1)	Note 2	N	
17.2.11.4	B.8 (1)	Note 2	N	
17.2.11.5(1)	B.8 (1)	Note 2	N	
17.2.11.5(2)	B.8 (1)	Note 2	N	
17.2.12.1	B.9 (1)	Note 2	N	
17.2.12.2(1)	B.9 (1)	Note 2	N	
17.2.12.2(2)	B.9 (1)	Note 2	N	
17.2.12.2(3)	B.9 (2)	Note 2	N	
17.2.12.2(4)	N/A	Note 3	N	
17.2.12.2(5)	B.9 (6)	Note 2	N	
17.2.12.2(6)	B.9 (2)	Note 2	N	
17.2.12.3(1)	B.9 (1)	Note 2	N	
17.2.12.3(2)	B.9 (1)	Note 2	N	
17.2.13.1(1)	B.7 (1)	Note 2	N	
17.2.13.1(2)	B.7 (1)	Note 2	N	
17.2.13.1(3)	B.7 (1)	Note 2	N	
17.2.13.1(4)	B.7 (1)	Note 2	N	
17.2.13.1(5)	B.7 (1)	Note 2	N	

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17.2.13.2(1)	B.7 (1)	Note 2	N	
17.2.13.2(2)	B.7 (1)	Note 2	N	
17.2.13.2(3)	B.7 (2)	Note 2	N	
17.2.13.3(1)	B.7 (1)	Note 2	N	
17.2.13.3(2)	B.7 (1)	Note 2	N	
17.2.13.3(3)	A.7.1	Note 2	N	
17.2.13.4(1)	B.7 (1)	Note 2	N	
17.2.13.4(2)	B.7 (1)	Note 2	N	
17.2.13.5	B.7 (1)	Note 2	N	
17.2.13.6(1)	B.7 (1)	Note 2	N	
17.2.13.6(2)	B.7 (1)	Note 2	N	
17.2.13.7(1)	B.7 (2)	Note 2	N	
17.2.13.7(2)	B.7 (2)	Note 2	N	
17.2.13.8	B.7 (1)	Note 2	N	
17.2.14.1	B.10 (1)	Note 2	N	
17.2.14.2(1)	B.10 (1)	Note 2	N	
17.2.14.2(2)	B.10 (1)	Note 2	N	
17.2.14.2(3)	B.10 (1)	Note 2	N	
17.2.14.3(1)	B.10 (2)	Note 2	N	
17.2.14.3(2)	N/A	Note 3	N	
17.2.14.3(3)	N/A	Note 3	N	
17.2.14.3(4)	N/A	Note 3	N	
17.2.14.4(1)	N/A	Note 3	N	
17.2.14.4(2)	N/A	Note 3	N	
17.2.14.4(3)	N/A	Note 3	N	
17.2.14.4(4)	N/A	Note 3	N	
17.2.14.5	B.14 (1) B.14 (2)	Note 2	N	
17.2.14.6(1)	N/A	This paragraph discusses the requirements for the Start-up Test Report. There is not an equivalent discussion in the QATR.	R	This report is not required by 10CFR50 Appendix B. Therefore, not including this wording does not degrade the Quality Assurance Program at the DAEC. This is being moved to UFSAR Section 1.8 via CAP 28653.

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17.2.14.6(2)	N/A	This paragraph discusses the requirements for the Start-up Test Report. There is not an equivalent discussion in the QATR.	R	This report is not required by 10CFR50 Appendix B. Therefore, not including this wording does not degrade the Quality Assurance Program at the DAEC. This is being moved to UFSAR Section 1.8 via CAP 28653.
17.2.15.1	B.13 (1) B.13 (2)	Note 2	N	
17.2.15.2	B.13 (2)	Note 2	N	
17.2.15.3(1)	B.13 (2)	Note 2	N	
17.2.15.3(2)	B.13 (2)	Note 2	N	
17.2.15.4(1)	B.13 (2)	Note 2	N	
17.2.15.4(2)	B.13 (2)	Note 2	N	
17.2.15.4(3)	B.13 (2)	Note 2	N	
17.2.16.1	B.13 (1)	Note 2	N	
17.2.16.2(1)	B.13 (1)	Note 2	N	
17.2.16.2(2)	N/A	Note 4	N	
17.2.16.2(3)	B.13 (3)	Note 2, Note 3, Note 4	N	
17.2.16.3	B.13 (2)	Note 2	N	
17.2.16.4(1)	A.7.1	Note 2	N	
17.2.16.4(2)	A.2.1.2	Note 2, Note 4	N	
17.2.16.5	Appendix A 4.0	Note 2	R	The Offsite Review Committee has been eliminated. See Enclosure 6 for the basis for reduction.
17.2.17.1	B.15 (1)	Note 2	N	
17.2.17.2(1)	B.15 (1)	Note 2	N	
17.2.17.2(2)	B.15 (3)	Note 2	N	
17.2.17.2(3)	B.15 (3)	Note 2	N	
17.2.17.3(1)	B.15 (3)	Note 2	N	
17.2.17.3(2)	B.15 (3)	Note 2	N	
17.2.17.3(3)	B.15 (3)	Note 2	N	
17.2.17.3.1(1)	B.15 (2)	Note 2	N	
17.2.17.3.1(2)	B.15 (2)	Note 2	N	
17.2.17.3.2	N/A	Note 3	N	
17.2.17.4(1)	B.15 (2)	Note 2	N	
17.2.17.4(2)	B.15 (2)	Note 2	N	

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17.2.17.4(3)	B.15 (2)	Note 2	N	
17.2.17.4(4)	B.15 (2)	Note 2	N	
17.2.17.5(1)	B.15 (3)	Note 2	N	
17.2.17.5(2)	B.15 (3)	Note 2	N	
17.2.17.5(3)	B.15 (3)	Note 2	N	
17.2.18.1(1)	C.1 (1)	Note 2	N	
17.2.18.1(2)	C.3 (1)	Note 2	N	
17.2.18.2(3)	C.3 (1)	Note 2	N	
17.2.18.2	A.7.3	Note 2	N	
17.2.18.2.1(1)	A.7.3	Note 2	N	
17.2.18.2.1(2)	A.7.3	Note 2	N	
17.2.18.2.1(3)	A.7.3	Note 2	N	
17.2.18.2.2(1)	A.7.3	Note 2	N	
17.2.18.2.2(2)	C.3 (1)	Note 2	N	
17.2.18.2.2(3)	C.3 (1)	Note 2	R	10 CFR 50 Appendix B requires a "system of planned and periodic audits." The provisions of the QATR provide for such a system in a manner that assures appropriate topic coverage using both a defined-frequency and a performance-based approach.
17.2.18.2.2(4)	C.3 (3)	Note 2	N	
17.2.18.3(1)	A.5 (1) A.5 (2)	Note 2	N	
17.2.18.3(2)	A.5 (1) A.5 (2)	Note 2	N	
17.2.18.3(3)	A.5 (1) A.5 (2)	Note 2	N	
17.2.18.4(1)	C.1 (4)	Note 2	N	
17.2.18.4(2)	C.1 (4)	Note 2	N	
17.2.18.4(3)	C.1 (4)	Note 3	N	
17.2.18.4(4)	C.1 (4)	Note 3	N	
17.2.18.5(1)	C.1 (4)	Note 2	N	
17.2.18.5(2)	C.1 (4)	Note 2	N	
17.2.18.5(3)	C.1 (4)	Note 2	N	
17.2.18.5(4)	C.1 (4)	Note 2	N	

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Current QAPD Section / (paragraph)	QATR Section / (paragraph)	Δ's	R/N/I (Note 1)	Basis for Reduction in Commitment Meeting Appendix B
17.2.18.5(5)	C.1 (4)	Note 2	N	
17.2A(1)	A.7.3	Note 2	N	
17.2A(2)	A.7.3	Note 2	N	
17.2A(3)	N/A	This is an information paragraph that is not required in the QATR	N	
17.2A – 1.0	A.7.3 Bullet 1	Note 2	N	
17.2A – 1.1	A.7.3 Bullet 1	Note 2	N	
17.2A – 1.2	N/A	This paragraph discusses the selection and training of security personnel. There is not an equivalent discussion in the QATR.	R	This commitment remains in the DAEC Technical Specifications.
17.2A – 2.0	A.7.3 Bullet 2	Note 2	N	
17.2A – 3.0	A.7.3 Bullet 3	Note 2	N	
17.2A – 4.0	A.7.3 Bullet 4	Note 2	N	
17.2A – 5.0	A.7.3 Bullet 5	Note 2	N	
17.2A – 5.1	A.7.3 Bullet 5	Note 2	N	
17.2A – 5.2	B.12 (3) B.16 (2)	Note 2	N	
17.2A – 5.3	B.9 (2)	Note 2	N	
17.2A – 5.4	B.4 (2)	Note 2	N	
17.2A – 5.5	B.9 (2)	Note 2	N	
17.2A – 5.6	B.6 B.7	Note 3	N	
17.2A – 5.7	B.9 (2)	Note 2	N	
17.2A – 6.0	A.7.3 Bullet 6	Note 2	N	
17.2A – 6.1	A.7.3 Bullet 6	Note 2	N	
17.2A – 6.2		This statement is is an information statement. It is not needed in the QATR.	N	
17.2A – 6.3	C.3.1	Note 2	N	
17.2A – 6.4	Appendix A	Note 2	R	The Offsite Review Committee has been eliminated. See Enclosure 6 for the basis for reduction.
17.2A – 6.4.1(1)	Appendix A	Note 2	N	

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Current QAPD Section / (paragraph)	QATR Section / (paragraph)	Δ's	R/N/I (Note 1)	Basis for Reduction in Commitment Meeting Appendix B
17.2A – 6.4.1(2)	Appendix A	<p>Note 2. PORC review of procedures is deleted based on NRC SER dated August 11, 1999, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 190 to Facility Operating License No. DPR-24 and Amendment No. 195 to Facility Operating License No. DPR-27, Wisconsin Electric Power Company Point Beach Nuclear Plant, Units 1 and 2, Docket Nos. 50-266 and 50-301."</p> <p>PORC review of "programs" reduced to those common to all current QAPDs at NMC plants.</p>	R	<p>Review of the procedures has been removed. This is covered by SER 1999-009 for the Point Beach Nuclear Plant. The DAEC procedure process does have independent review of procedures by a cognizant individual so the SER is applicable to the DAEC. Therefore, removing the requirement to review these documents does not degrade the Quality Assurance Program.</p> <p>Appendix B does not address PORC activities. The previous industry guidance for this function was not explicit regarding PORC review of specific programs. Reduction to the set common to all NMC plants provides consistency. The QATR continues to meet Appendix B.</p>
17.2A – 6.4.1(3)	Appendix A	Note 2	N	
17.2A – 6.4.2 All Paragraphs			R	The Offsite Review Committee has been eliminated. See Enclosure 6 for the basis for reduction.
17.2A – 6.5			R	The Offsite Review Committee has been eliminated. See Enclosure 6 for the basis for reduction.
17.2A – 6.6		This statement is an information statement. It is not needed in the QATR.		
17.2A – 6.7(1)	B.14 (3)	Note 2	N	
17.2A – 6.7(2)	B.14 (3)	Note 2 – The first statement in this section is not contained in the QATR and is therefore a reduction in commitment.	R	The review by the Operations Committee (PORC) and the Plant Manager is not required by 10 CFR 50 Appendix B. Therefore, the change does not degrade the Quality Assurance Program.

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Current QAPD Section / (paragraph)	QATR Section / (paragraph)	Δ's	R/N/I (Note 1)	Basis for Reduction in Commitment Meeting Appendix B
17.2A – 6.9(1)		This statement is an information statement. It is not needed in the QATR.	N	
17.2A – 6.9(2)	A.7.3 Bullet 8	Note 2	N	
17.2A – 6.10(1)			R	This commitment remains in the DAEC Security Plan
17.2A – 6.10(2)			R	This commitment remains in the DAEC Security Plan
17.2A – 6.11(1)	B.14 (1)	Note 3 – Procedures where usage may be dictated by an event are reviewed during operator training, including simulator activities, and emergency planning drills. Therefore, these procedures are reviewed per 17.2A – 6.11 (3).	N	
17.2A – 6.11(2)	B.14 (1)	Note 3	R	Processes exist to review procedures that are infrequently performed prior to use (Infrequently Performed Task/Evolution Pre-Job Briefings). Experience has shown that programs do keep procedures current, regardless of their type or usage frequency. Appendix B. requires that documents controlling activities be kept current and distributed to and used on the job. The QATR establishes controls that meet Appendix B.
17.2A – 6.11(3)	B.14 (1)	Note 3	N	
17.2A – 6.12	B.9 (2)	Note 2	N	
17.2A – 6.13	B.14	Note 2	N	
17.2A – 7.0	B.7 (4)	Note 2	N	
17.2A – 7.1	B.7 (4)	Note 2	N	
17.2A – 7.2	B.7 (4)	Note 2	N	
17.2A – 8.0	B.7 (2)	Note 2	N	
17.2A – 8.1	B.7 (2)	Note 2	N	
17.2A – 8.2	B.7 (2)	Note 2	N	
17.2A – 8.3	B.7 (2)	Note 2	N	
17.2A – 9.0	B.7 (4)	Note 2	N	
17.2A – 9.1	B.7 (4)	Note 2	N	

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Current QAPD Section / (paragraph)	QATR Section / (paragraph)	Δ's	R/N/I (Note 1)	Basis for Reduction in Commitment Meeting Appendix B
17.2A – 10.0	A.7.3 Bullet 8	Note 2	N	
17.2A – 11.0	A.5	Note 2	N	
17.2A – 11.1	A.5	Note 2	N	
17.2A – 11.2	A.5	Note 3	N	
17.2A – 11.3	N/A	This statement is is an information statement. It is not needed in the QATR.	N	
17.2A – 11.4	N/A	Note 3	N	
17.2A – 11.5	A.5	Note 2	N	
17.2A – 12.0	B.2 (6) B.3 (4)	Note 2	N	
17.2A – 13.0	C.3	Note 2	N	
17.2A – 13.1	C.3	Note 2	N	
17.2A – 13.2	C.3	Note 2	N	
17.2A – 14.0	B.15 (3)	Note 2	N	
17.2A – 14.1	B.15 (3)	Note 2	N	
17.2A – 14.2	N/A	Note 3	N	
17.2A – 14.3	B.15	Note 3	R	The handling of documents that have not become records (not yet authenticated) is not addressed in 10 CFR 50 Appendix B or NQA-1. Therefore, removing the statements does not degrade the Quality Assurance Program. NQA-1 17S-1 addresses temporary storage.
17.2A – 14.4	B.15 (3)	Note 2	N	
17.2A – 14.5	B.15 (3)	Note 2	N	
17.2A – 15.0	B.12 (4)	Note 2	N	
17.2A – 15.1	B.12 (4)	Note 2	N	
17.2A – 15.2	B.12 (4)	Note 2	N	
17.2A – 16.0	B.16 (2)	Note 2	N	
17.2A – 16.1	B.16 (2)	Note 2	N	
17.2A – 16.2	B.16 (2)	Note 2	N	
17.2A – 17.0	B.4 (2)	Note 2	N	
17.2A – 17.1	B.4 (2)	Note 2	N	
17.2A – 18.0	C.3	Note 2	N	
17.2A – 18.1	C.3	Note 2	N	

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Current QAPD Section / (paragraph)	QATR Section / (paragraph)	Δ's	R/N/I (Note 1)	Basis for Reduction in Commitment Meeting Appendix B
17.2A – 18.2	C.3	Note 2	N	
17.2A – 18.3	C.3	Note 2	N	
17.2A – 18.4	NQA-1 18S01 3.0	Note 2, Note 3	N	
17.2A – 18.5	NQA-1 18S01 3.0	Note 2, Note 3	N	
17.2A – 19.0	A.5	RG 1.146 was withdrawn.	R	
17.2A – 19.1	A.5	RG 1.146 was withdrawn.	R	
17.2A – 19.2	C.3	RG 1.146 was withdrawn.	R	
17.2A – 19.3	A.5	Note 2	N	
17.2A – 20.0	A.7.3 Bullet 20	Note 2	N	
17.2A – 21.0	A.7.3 Bullet 18	Note 2	N	
17.2A – 22.0	A.7.2	Note 2	N	
	B.16	This is a new commitment.	I	
	B.17	This is a new commitment.	I	
	A.7.3	This is a new commitment.	I	

NOTES:

1. R = Reduction in Commitment.
N = Not a Reduction in Commitment.
I = Increase in commitment.
2. Wording in the QATR establishes equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to Standard Review Plan 17.3 format. 10CFR50.54(a)(3)(i) or (v) apply.
3. Methodology details (the “how”) in the current program description are not included in the NMC QATR. The intent of the QATR is to establish appropriate/sufficient requirements (the “what”) to provide a quality assurance program meeting 10CFR50, Appendix B, but to allow flexibility in how the requirement is met. Therefore, this change in methodology detail (the “how”) is not considered to be a reduction in commitment.
4. The QATR does not assign responsibilities beyond those listed in Section A.2 and A.3. The responsibilities listed in DAEC UFSAR 17.2 are documented in lower tier documents.

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
Introduction(1)	Introduction Policy Statements	Note 2.	N	
Introduction(2)	A.1(2)	Note 2.	N	
Introduction(3)	Policy Statement A.1(4)	Note 2.	N	
1.0-1	A.1(1), A.2	Note. 2	N	
1.0-2(1)	A.2.1.1	Note 2.	N	
1.0-2(2)	A.2.1.2	Note 2.	N	
1.0-2(3)	A.2.1.2.a	Note 2. Note 3.	N	
1.0-2(4)	A.2.1.2.a	Note 2. Note 3.	N	
1.0-2(5)	A.2.1.2.b	Note 3.	N	
1.0-2(6)	A.2.1.2.a	Note 3.	N	
1.0-2(7)	A.2.1.2.a	Note 3.	N	
1.0-2(8)	A.2.1.2.a	Note 3.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
1.0-3(1)	A.1(1)(2)	The relationship with the Asset owner is described in general (rather than specifically) in QATR section A.1.	R	The QATR specifies that contractors, or other organizations supporting NMC, including Asset Owners, are required to comply with the QAP established by this QATR, or with their own programs having appropriate scope and controls. Therefore, the activities and responsibilities of WPSC are either covered by this QATR, or contained within their own Appendix B program. Because the QATR does not result in a reduction in commitment for the remaining organizational sections, in the aggregate, the QATR meets Appendix B. As such, this change to remove the WPSC specific reporting requirements from the QATR still meets Appendix B.
1.0-3(2)	A.1(1)(2)	Note 3.	R	See KNPP OQAPD Section 1.0-3(1) basis above.
1.0-3(3)	A.1(1)(2)	Note 3.	R	See KNPP OQAPD Section 1.0-3(1) basis above.
1.0-4(1)	A.2.2.1	Responsibility for 10CFR21 reporting transferred to the CNO in A.2.1.2	N	
1.0-4(2)	A.2.2.1.a	Site Director recognized	N	
1.0-4(3)	A.2.2.1.b	Note 3.	N	
1.0-4(4)	A.2.2.1, B.16(1)	Note 3.	N	
1.0-4(5)	A.2.2.1, A.3(6)	Note 3.	N	
1.0-4(6)	A.2.1.2.a	Note 3.	N	
1.0-4(7)	A.2.1.2.a	Note 3.	N	
1.0-4(8)	A.2.2.1.e	Note 3.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
1.0-4(9)	A.2.2.1.e	Note 3. QA Typing committee not described. See A.1(4).	N	
1.0-4(10)	A.2.2.1.e	Note 3.	N	
1.0-4(11)	A.2.2.1.e	Note 3.	N	
1.0-4(12)	A.2.2.1.e	Note 3.	N	
1.0-4(13)	A.2.2.1.b, A.2.2.1.d	Note 3.	N	
1.0-4(14)	A.2.2.1.b	Note 3.	N	
1.0-4(15)	A.2.2.1.b	Note 3.	N	
1.0-4(16)	A.2.2.1.d	Note 3.	N	
1.0-4(17)	A.2.2.1.d	Note 3.	N	
1.0-4(18)	A.2.2.1.c	Note 3.	N	
1.0-4(19)	A.2.2.1.d	Note 3.	N	
1.0-4(20)	A.2.2.1.d	Note 3.	N	
1.0-4(21)	A.2.2.1.d	Note 3.	N	
1.0-4(22)	A.2.2.1.d	Note 3.	N	
1.0-4(23)	A.2.2.1.d	Note 3.	N	
1.0-4(24)	A.2.2.1.g	Note 3.	N	
1.0-4(25)	A.2(3), A.2.2.1.h	Note 3.	N	
1.0-4(26)	A.5(1), A.7.3	Note 3.	N	
1.0-4(27)	A.2.2.1.h	Note 3.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
1.0-4(28)	A.2.2.1.h	Note 3.	N	
1.0-4(29)	A.2.2.1.h	Note 3.	N	
1.0-4(30)	A.2.1.2.b.1	Note 3.	N	
1.0-4(31)	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.1	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.2	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.3.	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.4	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.5	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.6	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.7.A	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.7.B	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.7.C	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.7.D	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.7.E	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.7.F	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.7.G	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.7.H	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.

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1.0-4.7.I	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.8	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.9	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.10	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.10.A	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.10.B	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4.10.C	NA	The QATR does not provide requirements for Offsite Safety Review Committee	R	See Enclosure 6.
1.0-4(32) (PORC)	App. A, 1.0	Note 2.	N	
1.0-4.1	App. A, 1.0	Note 2.	N	
1.0-4.2	App. A, 2.0(1)	Note 2. Disciplines represented differ slightly.	N	
1.0-4.3	App. A, 2.0(2), App. A, 3.0(2)		N	
1.0-4.4	App. A, 3.0(1)	Note 3. Minimum meeting frequency will be established in implementing procedures.	R	The QATR provides for establishing (similar) requirements at the procedure level. Previous industry guidance for PORC did not address this requirement. 10CFR50 Appendix B does not address PORC activities; therefore, the QATR continues to meet Appendix B.

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1.0-4.5	App. A, 3.0(2)	Note 3. Minimum quorum requirements will be established in implementing procedures.	R	The QATR provides for establishing (similar) requirements at the procedure level. Previous industry guidance for PORC did not address this requirement. 10CFR50 Appendix B does not address PORC activities; therefore, the QATR continues to meet Appendix B.
1.0-4.6.A	App. A, 4.0(1), B.14(1)	Note 2. PORC review of procedures is deleted based on NRC SER dated August 11, 1999, "Safety Evaluation by the Office of nuclear Reactor Regulation Related to Amendment No. 190 to Facility Operating License No. DPR-24 and Amendment No. 195 to Facility Operating License No. DPR-27, Wisconsin Electric Power Company Point Beach Nuclear Plant, Units 1 and 2, Docket Nos. 50-266 and 50-301."	R	Deletion of PORC review of procedures is consistent with the provisions of the cited SER, and the necessary review requirements are included in section B.14 of the QATR. The provisions for procedure review and approval continue to meet Appendix B requirements.
1.0-4.6-B	App. A, 4.0(2)	Note 2.	N	
1.0-4.6.C	App. A, 4.0(5)	Note 2.	N	
1.0-4.6.D	App. A, 4.0(3)	Note 2.	N	
1.0-4.6.E	App. A, 4.0(1)	Note 2. PORC review of "programs" reduced to those common to all current QAPDs at NMC plants. (Review of procedures addressed above.)	R	Appendix B does not address PORC activities. The previous industry guidance for this function was not explicit regarding PORC review of specific programs. Reduction to the set common to all NMC plants provides consistency. The QATR continues to meet Appendix B.
1.0-4.6.F	App. A, 4.0(6)	Note 2.	N	
1.0-4.6.G	App. A, 4.0(9)	Note 2.	N	
1.0-4.6.H	App. A, 4.0(7)	Note 2. OSRC replaced by Site Vice President, Site Director and Plant Manager.	R	See Enclosure 6.
1.0-4.6.I	App. A, 4.0(8)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
1.0-4.6.J	App. A, 4.0(1)	PORC review of "programs" reduced to those common to all current QAPDs at NMC plants.	R	Appendix B does not address PORC activities. The previous guidance for this function was not explicit regarding PORC review of specific programs. Reduction to the set common to all NMC plants provides consistency. The QATR continues to meet Appendix B.
1.0-4.6.K	App. A, 4.0(4)	Note 2.	N	
1.0-4.7.A	App. A, 5.0(1)	Note 3.	N	
1.0-4.7.B	App. A, 5.0(3)	Note 3. Requirement for providing meeting minutes to OSRC removed.	R	See Enclosure 6.
1.0-4.8	App. A, 6.0, B.15	Note 3. Requirement for providing meeting minutes to OSRC removed.	R	See Enclosure 6.
1.0-4(32)	A.1(4)	The Quality Typing Committee function is not addressed in the QATR. Note 3.	R	The QATR establishes "typing" criteria, and the requirement to maintain a means of identification of SSCs subject to QATR control.
2.0-1(1)	A.1(4)	Note 3. QATR substitutes NQA-1 for ANSI standards and of itself addresses the N18.7 administrative controls. Details of QA "typing" are not discussed in the QATR.	R	The QATR establishes "typing" criteria, and the requirement to maintain a means of identification of SSCs subject to QATR control.
2.0-1(2)	A.1(4), B.2	Note 3. Details of QA "Typing" not in QATR. Plant Physical change program not addressed in QATR.	R	The QATR establishes "typing" criteria, and the requirement to maintain a means of identification of SSCs subject to QATR control.
2.0-2(1)	A.1(1), A.3(3), A.5(1)	Note 3.	N	
2.0-2(2)	A.1(4)	Note 3.	N	
2.0-3(1)	Introduction, A.1(1)(3), B.14(1)(2)	Note 3.	N	
2.0-3(2)	A.1(6)	Note 3.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
2.0-3(3)	A.1(6), B.14(1)	Note 3.	N	
2.0-4	A.2(3), C.1(2), C.3(1)(3), A.2.2.1.h	Note 3.	N	
2.0-5(1)	A.5(1)	Note 3.	N	
2.0-5.A	A.5(1)	Note 3.	N	
2.0-5.B	A.5(1)	Note 3.	N	
2.0-5.C	A.5(1)	Note 3.	N	
2.0-5.D	A.5(1)	Note 3.	N	
2.0-5.E	A.5(1)	Note 3.	N	
3.0(1)	B.2	Note 3. Plant Physical Change Program not addressed by name in the QATR. QATR Section B.2 and B.3 encompass the aspects of the Plant Physical Change Program described in the OQAPD.	N	
3.0.1	B.2(1)	Note 2.	N	
3.0.2	B.2(1)	Note 2.	N	
3.0.3	B.2(1)	Note 2.	N	
3.0.4	B.2(2)	Note 2.	N	
3.0.5	B.17	Note 2.	I	
3.0.6	B.2(2), B.3(1)	Note 2.	N	
3.0.7	B.2(1)	Note 2.	N	
4.0(1)	B.4(1)(5)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
4.0(2)	B.4(6)(8)	Note 2.	N	
5.0(1)	A.1(6), B.14(1)	Note 2.	N	
5.0(2)	A.1(6), B.1, B.14(1)	Note 3. Plant Physical Change Program (e.g., plant design and modifications) is not addressed by name in QATR.	R	Although the name "Plant Physical Change Program" is not in the QATR, as stated in QATR Section B.1, activities governed by the QAP are performed as directed by documented instructions, procedures and drawings. Because the aspects of plant design and modification are covered by QATR section B.2 and B.3, the KNPP OQAPD requirement for design modifications to be made with implementing procedures is contained within the QATR. Therefore, the necessary elements of design control as required by 10CFR50 Appendix B are contained within the QATR.
6.0(1)	B.1(1), B.14	Note 3 .	N	
7.0(1)	B.4(4)	Note 2.	N	
7.0(2)	B.4(4)(6)	A "Qualified Suppliers List" is not identified in the QATR.	R	Any prospective supplier will be "evaluated" to ensure that only qualified suppliers are used. The identification of a Qualified Supplier List does not impact the commitment to evaluate and ensure that only qualified suppliers are used. As such, the QATR meets the requirements of 10CFR50 Appendix B.
8.0	B.4(5)(6)(8)	Note 2.	N	
9.0	B.11	Note 2.	N	
10.0(1)	B.4(6), B.12(1), A.2.2.1.h	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
10.0(2)	B.7(5), B.8(1), B.9(1), B.10(1), B.12(1)(2)	Note 2. Physical Change Program is not addressed in QATR.	R	<p>Although the name "Plant Physical Change Program" is not in the QATR, the referenced areas (i.e., special processes, test, measuring and test equipment, and cleanliness) are all activities governed by the QATR.</p> <p>Because the aspects of plant design and modification are also covered by QATR, the KNPP OQAPD requirement for design modification process to contain these specific areas is contained within the QATR. Therefore, the requisite elements of design control as required by 10CFR50 Appendix B are contained within the QATR.</p>
10.0(2) (cont.)	B.7(5), B.8(1), B.9(1), B.10(1), B.12(1)(2)	Review by NOS personnel is not addressed in the QATR.	R	<p>The QATR states that inspections are carried out by properly qualified persons independent of those who performed or directly supervised the work. This is commensurate with the KNPP OQAPD commitment for Nuclear Oversight to perform this activity. Appendix B does not stipulate the need for NOS personnel to review work packages. Therefore, this change is not a reduction in commitment and the QATR meets Appendix B.</p>
10.0(3)	A.5(3)	Note 2.	N	
10.0(4)	A.5(3)	Note 2. NQA-1 replaces N45.2.6, as endorsed by RG 1.28. See also Enclosure 3, NMC QATR Exceptions/ Alternatives.	N	
10.0(5)	A.1(1), A.5(1)	Note 2.	N	
11.0(1)	B.8	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
11.0(2)	B.8(1), B.13(1)	Note 2. Plant Physical change program not addressed QATR.	R	<p>Although the name "Plant Physical Change Program" is not in the QATR, the referenced areas (i.e., testing and evaluation of testing results) are all activities governed by the QATR.</p> <p>Because the aspects of plant design and modification are also covered by QATR, the KNPP OQAPD requirement for design modification process to contain these specific areas is contained within the QATR. Therefore, the requisite elements of design control as required by 10CFR50 Appendix B are contained within the QATR.</p>
12.0	B.9	Note 2.	N	
13.0(1)	B.7(1)(2)	Note 2.	N	
13.0(2)	B.7(1)(2)	Note 2.	N	
13.0(3)	B.7(1)(2)(3)(5)	Note 2.	N	
14.0(1)	B.10	Note 2.	N	
14.0.1	A.6, B.4(6), B.10	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
14.0.2	B.16, B.10, B.12(2)	Note 2. Review by NOS personnel is not addressed in the QATR.	R	The QATR states that inspection planning identifies required hold points, beyond which work is not to proceed without the consent of the inspection organization. This is commensurate with the KNPP OQAPD commitment for Nuclear Oversight to perform this activity. Appendix B does not stipulate the need for NOS personnel to review work packages. Therefore, this change is not a reduction in commitment and the QATR meets Appendix B.
15.0	A.6(3), B.13	Note 2.	N	
16.0(1)	A.6(1)(2)	Note 2.	N	
16.0(2)	A.6(2)	Note 2, Reportability is not addressed in the QATR.	R	Appendix B does not address reportability requirements associated with other NRC regulations. As such, removal does not constitute a reduction in commitment with respect to the QATR meeting Appendix B.
16.0(3)	A.2.2.1.h, C.3(2)	Note 3.	N	
16.0(4)	B.13	Note 2. Note 3.	N	
17.0(1)	B.15(1)(2)	Note 2.	N	
17.0(2)	B.15(1)(2)	Note 2. Note 3.	N	
17.0(3)	B.15(2)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
18.0(1)	C.3(1), B.4(4), A.5	Note 2. Two year frequency replaced in QATR by a performance based approach. Technical Specification assessments not addressed specifically in the QATR.	R	Appendix B requires a "system of planned and periodic audits." The provisions of the QATR provide for such a system in a manner that assures appropriate topic coverage using both a defined frequency and a performance-based approach.
18.0(2)	C.3(2)	Note 2.	N	
App A				
ANSI N18.7 General(1)	A.7.3(4)(7)	NQA-1 replaces N18.7 in the NMC QATR as described in RG1.28 and 1.33. Note 2.	N	
ANSI N18.7 General(2)	A.1(7)	Note 2. The QATR does not allow for a method of interpretation. Explanatory section regarding how interpretations are made not in QATR. Exception not retained in the QATR.	N	
ANSI N18.7 General(3)	A.6, A.1(7)	Note 2.	N	
ANSI N18.7 General(4)	Policy Statement(1)	Although the QATR does not address the instance where conflicting requirements co-exist, the QATR policy statement does require operation in compliance with the requirements of the facility operating license. Because the TS are part of the operating license, the OQAPD statement is provided for within the QATR.	N	
N18.7.3.1	NA	Explanatory section. The QATR establishes both QA and Administrative controls.	N	
N18.7, 5.2.2	B.14(3)	The QATR provides same requirement.	N	
N18.7, 5.2.7.2	B.3(3)(4)	Note 2, NQA-1 replaces N45.2.11 and applies to any design activity.	I	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
N18.7, 5.2.9	NA	Security is not directly addressed in the QATR since such measures are directly governed by 10CFR73.	R	Although security is not directly addressed in the QATR, QATR Section A.1(5) states that selected elements of the QAP are applied to certain activities that are not safety related, but support safe and reliable operations, including security. Implementing documents will establish program element applicability. As such, the QATR meets Appendix B.
N18.7, 5.2.12	B.15(3)	Note 2. NQA-1 replaces N45.2.9 to establish records requirements, nature and scope limitation in case not retained in QATR.	I	
N18.7, 5.2.15	B.14(2)	Note 2. QATR retains alternative to 2 year procedure reviews but does not specifically identify/retain a 2 year review requirement for specific procedure types.	R	Experience has shown that programs do keep procedures current, regardless of their type or usage frequency. Appendix B requires that documents controlling activities be kept current and distributed to and used on the job. The QATR establishes controls that meet Appendix B.
N45.2.9, 4.3/4.4	B.15(1)	Note 2. NQA-1 replaces N45.2.9	N	
N45.2.9, 5.6(1)	B.15(1)(2)(3)	Note 2. NQA-1 replaces N45.2.9. The QATR does not address transport.	N	Appendix B does not address transport of records.
N45.2.9, 5.6(2)	B.15(1)(3)	Note 2.	N	
N45.2.9, 5.6(3)	NA	Explanatory text providing basis for earlier paragraphs not needed in QATR.	N	
Fig 1	A.2	The QATR does not provide charts. The descriptions provide explicit reporting relationships. Note 2.	N	
Fig 2	A.2	The QATR does not provide charts. The descriptions provide explicit reporting relationships. Note 2.	N	
Fig 3	A.2	The QATR does not provide charts. The descriptions provide explicit reporting relationships. Note 2.	N	
None	B.16	Control of Plant Maintenance is not addressed in the current program.	I	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
None	B.17	Control of Computer Software is not addressed in the current program.	I	
None	A.7.3 (RIS 2000-18)	Electronic records are not addressed in the current program.	I	
None	C.2	Self-assessment is not addressed in the current program.	I	

NOTES:

1. R = Reduction in Commitment.
N = Not a Reduction in Commitment.
I = Increase in commitment.
2. Wording in the QATR and commitments to detailed requirements of NQA-1-1994 establish equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to Standard Review Plan 17.3 format. 10CFR50.54(a)(3)(i) or (v) apply.
3. Methodology details in the current program description may not be included in the NMC QATR. The intent of the QATR is to describe appropriate/sufficient requirements to establish how the quality assurance program meets 10CFR50, Appendix B, but to allow flexibility in the manner by which a requirement is met. Therefore, this change in methodology detail is not considered to be a reduction in commitment.

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Ref: Xcel Energy – Operational Quality Assurance Plan, Revision 25, effective date: 5/08/2003
NMC QATR [NMC-1, Rev. 0a, October 10, 2003]

General Note – The Xcel OQAP included Fire Protection Program requirements throughout the body of the document. Fire Protection Program requirements are not part of the NMC QATR. Therefore, all references to Fire Protection will be transferred to separate site documents. Specific Fire Protection references are not detailed in the Table below. QATR commitment to Quality Assurance requirements for Fire Protection is made in A.7.3, Branch Technical Position CMEB 9.5-1.

Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
1.1	Policy Statement	Note 2	N	
1.2	Policy Statement, A.7.1 & A.7.2	Note 2	N	
1.3	A.7.3	Note 2 The OQAP commitments to ANSI N18.7 and the ANSI N45.2 series of standards are replaced as described in the QATR by commitment to NQA-1-1994.	N	
1.4	A.1 (1, 3)	Note 2	N	
1.5	A.1, A.5	Note 2	N	
1.6	A.3 (2) C.1 (1, 3) C.3 (3)	Note 2 Referenced sections equivalent to CNO periodic review of OQAP.	N	
2.0	A.1 (2)	Note 2	N	
3.1	A.1, A.2, A.4	Note 2	N	
3.2	A.2.1, A.2.2, A.3, A.4	Note 2 The QATR does not provide charts. The descriptions provide explicit reporting relationships.	N	
4.1	Policy Statement, A.1, A.5, A.3, B.7, B.11, B.12, C.1	Note 2	N	
4.2	A.1, A.2	Note 2	N	
4.3	A.1, A.2, A.2.1, B.1, B.14, C.1 (1, 3), C.3 (3)	Note 2 Referenced sections equivalent to 4.3.2 periodic review of OQAP.	N	
4.4	A.1, B.1	Note 2, Note 3	N	
4.5	A.1 (3, 4)	Note 2, Note 3	N	
4.6	A.1 (3, 4)	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
4.7	A.2, A.2.1.2.b	Note 2, Note 3 4.7.2 – Dispute resolution not discussed in QATR.	R	Dispute resolution is not discussed in Appendix B. The QATR specifies organization and responsibilities that meet Appendix B.
4.8	A.1 (4), B.14 (1)	List of structure system components has been removed from QATR. Criteria provided for determining list are included in A.1 (4).	R	Programs (lists) are included in plant specific documents. This meets Appendix B requirements to identify applicable SSCs.
4.9	A.3 (3), A.5 (1)	Note 2	N	
5.1	B.2	Note 2	N	
5.2	A.1, B.2, B.3	Note 2	N	
6.1	B.4 (1)	Note 2	N	
6.2	A.1, A.7.1, A.7.3, B.4 (1, 4), B.5 (1)	Note 2 Note 3	N	
6.3	B.4	Note 2, Note 3 Approvals by management are not specifically stated in the QATR.	R	Reviews imply approvals. This is an administrative requirement. The QATR provides for reviews of procurement documents to assure the requirements of Appendix B are met.
6.4	A.7.3 (BTP CMEB 9.5-1)	Note 2	N	
7.1	A.1 (3, 6)	Note 2	N	
7.2	A.1 (3), B.14 (1), Appendix B (2)	Note 2	N	
7.3	A.1 (8), B.14 (1), Appendix B, B.11 (1)	Note 2	N	
7.4	A.1 (6)	Note 2	N	
8.1	B.14 (1, 2), B.16	Note 2	N	
8.2	A.3 (5), B.1, B.14 (1, 2)	Note 2	N	
8.3	A.3 (5), B.1, B.14 (1, 2)	Note 2	N	
8.4	B.14 (1, 2, 3)	Note 2, Note 3	N	
8.5	A.1 (6), B.14 (1)	Note 2, Note 3	N	
8.6	B.2 (1)	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
8.7	A.1 (4), B.14, A.7.3 (Reg Guide 7.10), Appendix B	Note 2	N	
8.8	B.14	Note 2	N	
8.9	B.14 (1)	Note 2	N	
9.1	B.4, B.5 (1)	Note 2	N	
9.2	A.1, B.4	Note 2	N	
9.3	B.4 (3 rd bullet)	Note 2	N	
9.4	B.12 (1), B.4 (5 th bullet)	Note 2	N	
10.1	B.6 (1)	Note 2	N	
10.2	B.6 (1), B.7 (1)	Note 2	N	
10.3	B.6 (1), B.7 (1)	Note 2	N	
10.4	B.12 (1), B.4 (5 th bullet), B.13	Note 2	N	
10.5	None	No specific reference for protection against theft or diversion in new QATR.	R	Meets 10CFR50 App. B requirements. Security Plan addresses theft/diversion of nuclear fuel.
11.1	B.11 (1)	Note 2	N	
11.2	A.1 (6), B.11	Note 2, Note 3 Braze not specifically referenced in QATR	R	The definition of Special Processes in the QATR encompasses the examples not listed, and the list included matches 10 CFR 50, App. B.
11.3	A.5 (1), B.11 (2)	Note 2 NQA-1, Basic Requirement 9, Supplement 9S-1 requires qual of personnel.	N	
11.4	A.1 (6), B.11 (1, 2)	Note 2, Note 3 Heat Treating not specifically referenced in QATR	R	The definition of Special Processes in the QATR encompasses the examples not listed, and the list included matches 10 CFR 50, App. B.
12.1	A.1 (4, 5), B.10 (1), B.12 (1, 2), App. B (Test & Inspection Proc.)	Note 2	N	
12.2	B.10 (1), B.12 (1, 2), App. B (Fuel Handling Proc.)	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
12.3	A.5 (1), B.12 (1, 2)	Note 2 NMC commits to NQA-1 for qualifications	N	
12.4	B.12 (1), B.16	Note 2, Note 3	N	
12.5	A.5 (1, 2), B.12 (1, 3), B.16	Note 2 Qualifications per NQA-1	N	
12.6	A.5 (1), B.12 (1)	Note 2, Note 3 Technical Services not specifically mentioned in QATR	R	Technical Services are not specified in Appendix B. The QATR provides for inspections that meet Appendix B.
12.7	A.5 (1), B.4 (5 th bullet)	Note 2 Qualifications per NQA-1	N	
12.8	A.5, B.4 (1), B.5 (1), B.12	Note 2 Qualifications per NQA-1	N	
12.9	A.7.3	Note 2 General inspection measures listed in B.4, B.10 and B.12.	N	
12.10	A.1 (4)	Note 2	N	
12.11	A.1 (5) A.12	Note 3 Emergency Equipment inspections not specifically addressed in QATR	R	The QATR establishes requirements for inspections that meet Appendix B.
12.12	A.5, B.7 (2 - 3 rd bullet)	Note 2	N	
12.13	A.5 (2), B.11	Note 2, Note 3 Specific NDE methods are not listed in the QATR, but are as listed in SNT-TC-1A and/or CP-189.	N	
12.14	B.12, App. B (Test & Insp. Procedures)	Note 2	N	
13.1	B.8, B.10, Appendix B (Test & Insp. Procedures)	Note 2	N	
13.2	A.5, B.8 (1), Appendix B (Test & Insp. Procedures)	Note 2	N	
13.3	B.8 (1)	Note 2	N	
13.4	B.4 (5 th bullet), B.8 (1)	Note 2 OQAP – requires completion of proof tests prior to installation. QATR – requires proof test completion prior to operability.	R	Appendix B, Criterion VII, requires tests prior to installation <u>or</u> use. The QATR meets this requirement.

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
13.5	B.8, Appendix B (Test & Insp. Procedures)	Note 2 Note 3	N	
13.6	A.5 (1)	Note 2	N	
14.1	B.9 (1)	Note 2	N	
14.2	B.9 (1)	Note 2	N	
14.3	B.9 (1 – 4 th bullet)	Note 2 National Institute of Standards & Technology (NIST) is specified in OQAP, but not QATR. However, the “national standards” wording in the QATR provides necessary control.	R	Appendix B requires that M&TE be properly controlled, calibrated, etc, to maintain accuracy within specified limits. The QATR provides controls that meet this requirement.
15.1	B.7 (1)	Note 2	N	
15.2	B.7	Note 2	N	
15.3	B.7	Note 2 No specific reference to nuclear fuel storage in QATR	R	10CFR50 App. B does not specify fuel storage requirements.
15.4	B.7	Note 2 No specific reference to radioactive material storage in QATR	R	10 CFR 20 encompasses radioactive material storage requirements.
15.5	B.7	Note 2	N	
15.6	B.7	Note 2	N	
15.7	A.1 (4), B.7 (3 rd bullet)	Note 2	N	
16.1	B.10	Note 2	N	
16.2	B.16	Note 2, Note 3	N	See NQA-1, subpart 2.18, para. 2.5(c) for ref to ALARA
16.3	B.8, B.10	Note 2	N	
16.4	B.10	Note 2, Note 3	N	
16.5	B.10	Note 2, Note 3 No specific reference to key control in QATR	R	Security related Key control is covered in the Site Security Plan. The QATR provides for control measures that meet Appendix B, Criterion 14.
16.6	B.2(4) B.10	Note 2, Note 3	N	
16.7	A.7.1	Note 2, Note 3 Radioactive Material control is not detailed in the QATR.	R	This is not an Appendix B topic. Site program procedures include rad material control.
16.8	App. B (Start-up Procedures)	Note 2	N	
17.1	A.6 (3), B.6, B.13	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
17.2	B.4 (4 th and 5 th bullets), B.13 (3)	Note 2, Note 3	N	
17.3	B.13 (3)	Note 2, Note 3	N	
17.4	B.13	Note 2, Note 3	N	
17.5	A.6, B.13	Note 2	N	
17.6	A.7.1, A.2.1.2	Note 2	N	
18.1	A.6 (2), B.13	Note 2	N	
18.2	A.6 (2), B.13	Note 2, Note 3	N	
18.3	C.3 (2)	Note 2	N	
19.1	B.15 (1, 2)	Note 2, Note 3	N	
19.2	B.15 (3)	Note 2, Note 3	N	
19.3	B.15 (1)	Note 2	N	
19.4	B.15 (1)	Note 2	N	
19.5	A.5 (1), B.15 (1)	Note 2	N	
19.6	B.4 (4 th bullet), B.15 (1)	Note 2	N	
19.7	B.8, B.15 (1)	Note 2	N	
19.8	C.3 (3), B.15 (1)	Note 2	N	
19.9	B.15	Note 2, Note 3	N	
19.10	B.2 (3), B.14 (1), B.15 (1)	Note 2	N	
19.11	B.15	Note 2	N	
19.12	B.15 (2)	Note 2, Note 3 Retention times for operating records are not specified in QATR, but are specified in OQAP.	R	Retention times are required to be specified in RMS procedures, per NQA-1, Supplement 17S-1, 2.8. The requirements of NQA-1, for records maintenance, have been endorsed by the NRC, via RG 1.28, as meeting Appendix B requirements. Therefore, the QATR, which commits to NQA-1, continues to meet Appendix B.
20.1	C.1 (2), C.3 (2, 3)	Note 2	N	
20.2	C.3 (1, 3)	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
20.3	C.3 (1)	Note 2 The QATR replaces audits at defined frequencies (maximum of 2 years) with performance-based assessments (dynamic schedule frequencies). Certain topics retain designated frequencies where required by regulation.	R	10CFR50, App. B requires a system of planned and periodic audits. The provisions of the QATR provide for such a system in a manner that assures appropriate topic coverage using both a defined frequency and a performance-based approach.
20.4	C.1 (2, 4)	Note 2	N	
20.5	C.3 (2, 3)	Note 2	N	
20.6	C.3 (3)	Note 2, Note 3 QATR does not specify who resolves disputes.	R	Dispute resolution is not discussed in Appendix B. See 4.7, above.
21.0	N/A	The QATR does not provide requirements for Offsite Safety Review Committee.	R	See Enclosure 6.
22.1	Appendix A (2.0, 3.0)	Note 2, Note 3 QATR requires member appointment by the Plant Manager.	N	
22.2	Appendix A (3.0)	Note 2, Note 3 QATR says minimal frequency will be specified in procedures.	R	Previous industry guidance for PORC did not address meeting frequency. Appendix B does not address onsite reviews, therefore the QATR continues to meet Appendix B.
22.3	Appendix A (3.0)	Note 2, Note 3 QATR references quorum will be established per procedure.	R	Previous industry guidance for PORC did not address quorum requirements. Appendix B does not address onsite review, therefore the QATR continues to meet Appendix B.
22.4	App A (4.0), B.14 (1)	Note 2, Note 3 QATR does not cover topics in 2.2.7/8/9/10, nor results of tests and experiments per 22.4.1. PORC review of procedures is deleted based on NRC SER dated August 11, 1999, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 190 to Facility Operating License No. DPR-24 and Amendment No. 195 to Facility Operating License No. DPR-27, Wisconsin Electric Power Company Point Beach Nuclear Plant, Units 1 and 2, Docket Nos. 50-266 and 50-301."	R	10CFR50, App. B does not specify any required reviews, however, the reviews specified are consistent with previous industry guidance for what offsite reviews should cover. Deletion of PORC review of procedures is consistent with the provisions of the cited SER, and the necessary review requirements are included in section B.14 of the QATR. The provisions for procedure review and approval continue to meet Appendix B requirements.

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
22.5	Appendix A (5.0)	Note 2, Note 3 QATR does not describe the process to resolve disagreements. QATR does not require notification of disagreement to OSRC.	R	This is not addressed by Appendix B.
22.6	Appendix A (6.0)	Note 2, Note 3 QATR doesn't specify the additional distribution requirements cited in the OQAP.	R	Appendix B does not specify requirements for onsite reviews.
22.7	Appendix A (1.0)	Note 2, Note 3	N	
Appendix A – Systems, and Components Subject to Appendix B of 10CFR50	A.1 (4)	Note 2, Note 3 QATR references "A list, or other means of identification, of safety related Systems, Structures, and Components (SSC) under the control of the QAP is established and maintained for each operating plant."	R	List will be relocated at MNGP, outside of the QATR.
Appendix C – Nuclear Plant Fire Protection Program	Fire Protection Program is not included in the QATR. Table 2 for Fire Protection Audit frequency.	Note 2, Note 3 The previous 1, 2 and 3-year fire protection assessments, per 14.0, are replaced by a 2-year assessment using a qualified offsite fire protection specialist.	R	Fire Protection program will be relocated at MNGP, outside of the QATR. The change in fire protection frequency is supported by NRC approval on 8/30/96 for the same change made by PECO Nuclear for its Limerick and Peach Bottom plants.
None	B.16	Control of Plant Maintenance is not addressed in the OQAP.	I	
None	B.17	Computer Software Control is not addressed in the OQAP.	I	
None	A.7.3 (RIS 200-18)	Electronic records are not addressed in the OQAP.	I	
None	C.2	Self-assessment is not addressed in the OQAP.	I	

NOTES:

1. R = Reduction in Commitment.
N = Not a Reduction in Commitment.
I = Increase in commitment.
2. Wording in the QATR establishes equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to Standard Review Plan 17.3 format. 10 CFR 50.54(a)(3)(i) and/or (v) apply.
3. Methodology details in the current program description may not be included in the NMC QATR. The intent of the QATR is to describe appropriate/sufficient requirements to establish how the quality assurance program meets 10CFR50, Appendix B, but to allow flexibility in the manner by which a requirement is met. Therefore, this change in methodology detail is not considered to be a reduction in commitment.

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
Statement of Resp.	Policy Introduction A.1(4) A.2.1.2 A.2.1.2.b	Note 2. The QPD commitments to ANSI N18.7 and the ANSI N45.2 series of standards are replaced as described in the QATR by commitment to NQA-1-1994..	N	
1.1(1)	A.1(1) A.4(1)	Note 2.	N	
1.1(2)	A.2(1)(3) A.2.1.2.b.1	Note 2.	N	
1.1(3)	A.2(3) B.1 C.3(1)	Note 2.	N	
1.2.1(1)	A.2(2) A.2.1.2 A.2.1.2.b	Note 2.	N	
1.2.2(1)	A.2.1.1 A.2.1.2 A.2.2.1	Note 2.	N	
1.2.2.a	A.2.2.1 A.2.2.1.a A.2.2.1.b A.2.2.1.c A.2.2.1.d A.2.2.1.e A.2.2.1.f A.2.2.1.g	Note 2. Note 3.	N N	
1.2.3	A.2(1) A.2.2.1.b A.2.1.2.b.1 A.2.2.1.h	Note 2. Note 3.	N N	
Org chart	NA	The QATR does not provide charts. The descriptions provide explicit reporting relationships. Note 2.	N	
2.1(1)	A.1(1)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
2.1(2)	A.1(4) A.5(1) B.1	Note 2.	N	
2.1(3)	C.1(1) C.1(2) C.3	Note 2.	N	
2.2.1	Policy Statement	Note 2.	N	
2.2.2	A.2(3)	Note 2.	N	
2.2.3(a-b)	N/A	QATR becomes effective after NRC approval.	N	
2.2.3(c)	A.1(4)	"Decommissioning" excluded from QATR.	R	NMC only operates plants. QATR still meets App B criteria.
2.2.4(1)	A.1(7) Introduction	Note 2.	N	
2.2.4(2)	A.7.3	Note 2. Instead of a list of exceptions at the end, the QATR includes exceptions/alternatives within the body at the appropriate points.	N	
2.2.4(3)	A.1(7)	Note 2.	N	
2.2.5(a)	A.1(3)	Note 2.	N	
2.2.5(b)	A.1(1) A.2(5) B.4(4)	Note 2.	N	
2.2.5(c)	A.1(4)(5)	Note 2. The QATR wording is less explicit but more encompassing, and is deemed to include the QPD items.	N	
2.2.6(1)	A.1(4)	Note 2.	N	
2.2.6(2)	A.1(4)	Note 2.	N	
2.2.6(3)	A.1(4)	Note 2. Note 3.	N	
2.2.6(4)	A.1(4) B.6	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
2.2.7(a)	A.5(1)	Note 2.	N	
2.2.7(b)	B.1(1)	Note 2.	N	
2.2.7(c)	B.16(2)	Note 2.	N	
2.2.7(d)	B.6(1)	Note 2.	N	
2.2.7(e)	B.16(1)	Note 2.	N	
2.2.7(f)	B.1	Note 2.	N	
2.2.7(g)	B.7(2) B.16(1)	Commitment to NQA-1-1994 especially Subparts 2.1, 2.4 and 2.8 establish same requirement. Wording not in QATR.	N	
2.2.7(h)	B.8(1) B.11(1)-12(1)	Note 2.	N	
2.2.8	B.17	Note 2. QATR commitment to NQA-1-1994 subpart 2.7 is an increase.	I	
2.2.9(1)	A.2.2.1.a A.2.2.1.c	Note 2.	N	
2.2.9(a)	A.5(1)	Note 2.	N	
2.2.9(b)	A.5(2)	Note 2.	N	
2.2.9(c)	A.5(2)	Note 2.	N	
2.2.9(d)	A.5(1)	Note 2.	N	
2.2.9(e)	A.5(2)	Note 2. Commitment to NQA-1-1994 includes the requirement, which is not restated in the QATR.	N	
2.2.9(f)	A.5(1)	Note 2. Note 3.	N	
2.2.9(g)	A.5(1)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
2.2.10(a)	C.3(2)	Note 2.	N	
2.2.10(b)	NA	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.
3.1(1)	B.2(1)	Note 2. Note 3.	N	
3.2.1	A.2	Note 2. Note 3.	N	
3.2.2	A.6(1)	Note 2.	N	
3.2.3	B.2(1) B.4(7) B.3(1)	Note 2.	N	
3.2.4	B.4(5)	Note 2.	N	
3.2.5	B.2(1)	Note 2.	N	
3.2.6	B.3(4)	Note 2.	N	
3.2.7	B.3(1)	Note 2. Note 3.	N	
3.2.8(1-5)	B.3(4)	Note 2. Note 3.	N	
3.2.9(1)	B.3(3)	Note 2. 3.2.9(3.b) not retained.	I	Deletion of allowance for procedure control in lieu of individual approval is an increase. Design verification process still meets Appendix B.
3.2.9(2)	B.3(3)	Note 2.	N	
3.2.10	B.3(2)	Note 2.	N	
3.2.11	B.17	Note 2. Commitment to NQA-1-1994, subpart 2.7 is an increase.	I	
3.2.12	B.2(2) B.2(4)	Note 2.	N	
4.1(1)	B.4(5)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
4.2.1	B.4(8)	Note 2.	N	
4.2.2	B.4(4)	Note 2.	N	
4.2.3(a-h)	B.4	Note 2. Note 3. Details of QPD are covered in NQA-1-1994 and are not repeated in the QATR.	N	
4.2.4(a-c)	B.4(8)	Note 2. Note 3. Details of QPD are covered in NQA-1-1994 and are not repeated in the QATR.	N	
4.2.5	B.4(8)	Note 2. Note 3. Details of QPD are covered in NQA-1-1994 and are not repeated in the QATR.	N	
5.1(1)	A.1(6)	Note 2.	N	
5.2(1)	A.2	Note 2.	N	
5.2(2)	A.1(6)	Note 2.	N	
5.2(3)	A.1 App B	Note 2.	N	
5.2(1-15)	A.1(6) App B	Note 2. QATR refers to RG1.33 Appendix A. Item 15 not retained.	N R	Item 15, Modification Procedures, is not specifically required by App B. The QATR requires procedures of a type appropriate to the circumstances, which is the same as required by App B.
6.1(1)	B.14(1)	Note 2.	N	
6.1(2)	B.14(2)	Note 2.	N	
6.1*	None	Note 3. See B.14	R	Level of approval authority is established as part of document control provisions of B.14. The detail is not specifically required by 10CFR App B.
6.2.1	A.2	Note 2.	N	
6.2.2(a)	B.14(1)	Note 2.	N	
6.2.2(b)	B.14(1)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
6.2.2c	B.14(1) B.4(1)	Note 2.	N	
6.2.2(d)	B.14(1)	Note 2.	N	
6.2.2(e)	B.14(1)	Note 2.	N	
6.2.2(f)	A.6(1) B.13(1)	Note 2.	N	
6.2.2(g)	B.14(1)	Note 2.	N	
6.2.3(a-c)	B.14(1)(2)	Note 2.	N	
6.2.4(a,b)	B.14(1')	Note 2.	N	
6.2.5	B.14(1)	Note 2. Note 3.	N	
6.2.6	B.2(3)	Note 2.	N	
7.1(1)	B.4(4)(5)(8) B.5(1)	Note 2.	N	
7.2.1	A.2	Note 2.	N	
7.2.2	B.4(4)	Note 2. Note 3. Level of detail deferred to NQA-1-1994 and Regulatory Guide 1.28.	N	
7.2.3	A.1(6) B.4(6)(7) B.5(1)	Note 2. Note 3. Level of detail deferred to NQA-1-1994.	N	
7.2.4(1)	B.4(2)	Note 2.	N	
7.2.4(a)	B.4(2)	Note 2.	N	
7.2.4(b)	B.4(7)	Note 2.	N	
7.2.(c)	B.4(2)	Note 2.	N	

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7.2.4d	B.4(1)(2)	Note 2.	N	
7.2.5	B.4(6) B.5	Note 2.	N	
7.2.6(a-d)	B.4(5)	Note 2.	N	
7.2.6(2)	B.4(6) B.5	Note 2.	N	
7.2.7	B.4	Note 2.	N	
8.1(1)	B.6	Note 2.	N	
8.2.1	B.6	Note 2.	N	
8.2.2	B.6	Note 2.	N	
8.2.3	B.6	Note 3. "Verification of traceability" not addressed. Level of detail deferred to NQA-1.	R	QATR controls regarding identifying and controlling items to prevent use of incorrect or defective items are consistent with 10CFR50, App B. Verification is applied as required by NQA-1.
9.1(1)	B.11	Note 2.	N	
9.2.1	B.11	Note 3. The list in the QATR does not include "application of protective coatings" or "concrete placement."	R	The definition of Special Processes in the QATR encompasses the examples not listed, and the list included matches Appendix B.
9.2.2	A.2	Note 2.	N	
9.2.3	A.5 B.11	Note 2.	N	
9.2.4	A.5	Note 2.	N	
9.2.5	B.11	Note 2.	N	

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9.2.6	A.5	Note 2.	N	
9.2.7	C.3(1)Table 1	Note 2.	N	
10.1	B.12(1)	Note 2.	N	
10.2.1	A.2	Note 2.	N	
10.2.2(1)	B.12(1)	Note 2. Inspection is not applied to decommissioning, as NMC does not perform this activity and the QATR specifically excludes it (see A.1).	R	Appendix B does not include decommissioning in its scope.
10.2.2(a-f)	B.12(2)	Note 2.	N	
10.2.2(2)(3)	B.12(5)	Note 2.	N	
10.2.3(1)	A.5(1)	Note 2.	N	
10.2.3(2)	A.5(1)	Note 2.	N	
10.2.3(3)	A.5(1)(4)	Note 2.	N	
10.2.4	B.12(1)(4)	Note 2.	N	
10.2.5	B.12(4)	Note 2.	N	
10.2.6(1)	B.12(3)	Note 2.	N	
10.2.6(2)	B.12(4)	Note 2.	N	
10.2.7	A.5(3) B.12(1)	Note 2. Alternate qualification option retained as an exception to NQA-1.	N	
10.2.8	B.12(3)	Note 2.	N	
10.2.9	A.2.2.1.e A.4(2)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
10.2.10	A.5(3)	Note 2.	N	
11.1	B.8(1)	Note 2.	N	
11.2.1	A.2	Note 2.	N	
11.2.2(1)	B.8(1)	Note 2.	N	
11.2.2(a-f)	B.8(1)	Note 2.	N	
11.2.3(1)(a-f)	B.8(1)(2)	Note 2.	N	
11.2.3(2)	B.14(1)	Note 2.	N	
11.2.3(3)	B.8(1)	Note 2.	N	
12.1(1)	B.9(1)	Note 2.	N	
12.2.1	A.2	Note 2.	N	
12.2.2	A.1(6) B.9(7)	Note 2.	N	
12.2.3	B.9(3)	Note 2.	N	
12.2.4	B.9(3)	Note 2.	N	
12.2.5(1)	B.9(2)	Note 2.	N	
12.2.5(2)	B.9(4)	Note 3. Authorization is not specifically addressed in the QATR or NQA-1; however documented justification is required.	R	Authorization is an expected part of the control established in the QATR. The controls provided meet Appendix B.
12.2.5(3)	B.9(4)(5)	Note 3. Authorization is not specifically addressed in the QATR or NQA-1; however documented justification is required.	R	Authorization is an expected part of the control established in the QATR. The controls provided meet Appendix B.
12.2.6	B.9(5)	Note 3. Authorization is not specifically addressed in the QATR or NQA-1; however documented justification is required.	R	Authorization is an expected part of the control established in the QATR. The controls provided meet Appendix B.

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12.2.7	B.9(5)	Note 2.	N	
12.2.8	B.9(6)	Note 2.	N	
13.1(1)	B.7(1)	Note 2.	N	
13.2.1	A.2	Note 2.	N	
13.2.2(1)	B.7(1)	Note 2.	N	
13.2.2(a-d)	B.7(1)(2)	Note 2.	N	
14.1(1)	B.10(1)	Note 2.	N	
14.2.1	A.2	Note 2.	N	
14.2.2	B.4(3) B.10(1)	Note 2.	N	
14.2.3	B.10(1)	Note 2.	N	
14.2.4	A.1(6) B.14(1)	Note 2.	N	
14.2.5	A.6(4) B.10(2)	Note 2.	N	
15.1(1)	A.6(1)(2) B.13(3)	Note 2.	N	
15.2.1(1)	B.13(3)	Note 2.	N	
15.2.1(a)	A.6(3) B.13(3)	Note 2.	N	
15.2.1(b)	B.13(1)	Note 2.	N	
15.2.1(c)	B.13(1)	Note 2.	N	
15.2.1(d)	B.13(3)	Note 2.	N	

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15.2.2	B.13(3)	Note 2.	N	
15.2.3	B.8(2) B.13(1)	Note 2.	N	
15.2.4	A.6(a)	Note 2.	N	
16.1(1)	A.6(1)	Note 2.	N	
16.1(2)	A.6(1)	Note 2.	N	
16.2.1	A.2	Note 2.	N	
16.2.2	A.6(1) B.13(1)	Note 2.	N	
16.2.3	A.6(1)	Note 3. QATR does not explicitly address "extent of the condition." However, extent is covered as a normal part of the evaluation.	N	
17.1(1)	B.15(1)	Note 2.	N	
17.2.1	A.2	Note 2.	N	
17.2.2(1)	B.15(1)	Note 2.	N	
17.2.2(a-i)	B.15(2)	Note 2. Note 3.	N	
17.2.3(a-f)	B.8(2) B.12(9)	Note 2.	N	
17.2.4	B.15(2)	Note 2. Appendix E from QPD replaced with RG 1.28 and NQA-1 guidance for retention periods.	N	
17.2.5	NA	Note 2.	N	
17.2.6	B.15(3)	Note 2.	N	
17.2.7	B.15(3)	Note 2.	N	

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17.2.8	B.15(3)	Note 2. QATR, via NQA-1, allows for single records storage facility.	R	Appendix B requires protection of records. The requirements of NQA-1 for records maintenance have been endorsed by NRC in RG 1.28 as meeting the Appendix B requirements. Therefore, the QATR, which commits to NQA-1, continues to meet Appendix B.
18.1(1)	C.1(1) C.3(1)	Note 2.	N	
18.2.1	A.2	Note 2.	N	
18.2.2	C.3(1)	Note 2. The QATR replaces audits at defined frequencies with performance-based assessments.	R	Appendix B requires a "system of planned and periodic audits." The provisions of the QATR provide for such a system in a manner that assures appropriate topic coverage using both a defined frequency and a performance-based approach.
18.2.3	B.4(4)	Note 2.	N	
18.2.4	B.5(1)(2)	Note 2.	N	
18.2.5	C.3(1)	Note 2.	N	
18.2.6	C.3(1)	Note 2.	N	
18.2.7	C.3(3)	Note 2.	N	
18.2.8	C.1(2) C.3(1)	Note 2.	N	
18.2.9	C.3(3)	Note 2.	N	
18.2.10	C.3(2)	Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
Appendix A, Part 1	A.7	The list of items addressed is effectively the same with the update to NQA-1 and the addition of RG 1.28. Item 21, 10CFR50, App R, is not listed in the QATR.	R	Appendix B does not require commitment to Appendix R. 10CFR50 does require this, as specifically addressed in the UFSAR. Thus the QATR continues to meet Appendix B, and the plant continues its commitment to Appendix R as required.
Appendix A, Part 2			NA	
1.	A.7.3(1) B.4(5)	Note 2.	N	
2.	NA	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.
2a.	A.2.2.1	Site Vice President replaces Plant Manager.	N	
2b.	NA	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.
2c.	NA	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.
2d.	NA	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.
2e.	NA	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.
2f.	NA	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.
2g.	A.2.2, A.3, A.4	Note 2. Exception not retained.	N	
2h.	B.14(3) Appendix A, 4.0	Note 2. Review by PORC within 30 days not retained.	R	Appendix B does not address an onsite review function. Previous industry standards included significantly less detail in describing the onsite review function and its involvement with review of selected documents or changes.
2i.	A.6(2)(3), B.6(1), B.10(1), B.13	Note 2.	N	
2j.	A.5(3)	Note 2.	N	
2k.	B.8(1)	Note 2.	N	

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2l.	B.4(5)(8)	Exception retained. Note 2.	N	
2m.	B.4(8)	Note 2.	N	
2n.	B.14(2), C.3(1)	Note 2. Body of exception retained. No two-year reviews required for specific procedure types.	R	Experience has shown that programs do keep procedures current, regardless of their type or usage frequency. Appendix B requires that documents controlling activities be kept current and distributed to and used on the job. The QATR establishes controls that meet Appendix B.
2o.	B.9(3)(7)	Note 2.	N	
2p.	A.5(3), B.12(4), B.16(2)	Note 2.	N	
2q.	B.12(2)	Exception not retained. Note 3.	N	
2r.	B.16(1)	Note 2.	N	
2s.	B.14(1), B.16(2)	Note 2.	N	
3a.	C.3(1)	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.

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3b.	C.3(1)	Exception not retained. Note 3. The QATR does not establish a standard frequency for assessing Technical Specification compliance.	R	The exception was related to previous audit type and frequency recommendations in RG 1.33 for the auditing of compliance to plant Technical Specifications. In QATR section C.3, NMC establishes a system of planned and periodic assessments (audits) that meet Appendix B requirements and provide for coverage of surveillance testing and other activities where Tech Specs would form part of the requirements set being assessed. Since the assessment program will include verification of Tech Spec compliance as appropriate, the QATR continues to meet Appendix B, Criterion 18.
4a.	A.5 A.7.3(2)	Exception not retained. Commitment to RG 1.8 is addressed in A.7.3(2).	N	
5a.	A.7.3(2)	Exception not retained. Commitment to RG 1.8 is addressed in A.7.3(2).	N	
5b.	A.5	Note 2.	N	
6a.	A.5(2)	Exception retained. Note 2. N45.2.1 replaced with NQA-1-1994, Subpart 2.1.	N	
6b.	B.7(4)	Exception retained. Note 2.	N	
6c.	B.7(4)	Exception not retained. Note 2.	N	
7a.	B.7(2)	Exception retained. Note 2. N45.2.2 replaced with NQA-1-1994, Subpart 2.2.	N	
7b.	A.5, B.5	Exception not retained. Note 2.	N	
7c.	B.7(2)	Exception not retained. Note 2.	N	
7d.	B.7(2)	Exception not retained. Note 2.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
7e.	B.7(2)	Exception retained. Note 2.	N	
7f.	B.7(1)(2)	Exception not retained. Note 2.	N	
7g.	B.7(2)	Exception not retained. Note 2.	N	
7h.	B.7(2)	Exception not retained. Note 2.	N	
8a.	B.7(4)	Exception retained. Note 2. N45.2.3 replaced with NQA-1-1994, Subpart 2.3.	N	
9a.	A.5, B.2, B.7, B.14	Exception not retained. Note 2. N45.2.4 replaced with NQA-1-1994, Subpart 2.4.	N	
9b.	B.4(8)	Exception retained. Note 2.	N	
9c.	B.9(1)(3)(7)	Exception retained. Note 2.	N	
10a.	A.5	Exception not retained. Note 2. N45.2.5 replaced with NQA-1-1994, Subpart 2.5.	N	
10b.	B.9(6)	Exception retained. Note 2.	N	
10c.	B.9(2)	Exception retained. Note 2.	N	
11a.	A.5	Exception not retained. Note 2. N45.2.6 incorporated into Basic and Supplemental Requirement of NQA-1.	N	
12a.	A.5	Exception not retained. RG 1.58 withdrawn.	N	
12b.	A.5	Exception not retained. RG 1.58 withdrawn.	N	
12c.	A.5	Exception not retained. RG 1.58 withdrawn.	N	
12d.	A.5	Exception not retained. RG 1.58 withdrawn.	N	
13a.	A.5, A.7.3(2)	Exception not retained. N45.2.8 replaced with NQA-1-1994, Subpart 2.8.	N	
13b.	B.16(2)	Exception not retained. Note 2. N45.2.8 replaced with NQA-1-1994, Subpart 2.8.	N	
13c.	B.4(8)	Exception not retained. Note 2. N45.2.8 replaced with NQA-1-1994, Subpart 2.8.	N	
13d.	B.3(2)	Exception not retained. Note 2. N45.2.8 replaced with NQA-1-1994, Subpart 2.8.	N	
13e.	B.7(4)	Exception not retained. Note 2. N45.2.8 replaced with NQA-1-1994, Subpart 2.8.	N	
14a.	B.15(3)	Exception retained. Note 2. N45.2.9 incorporated into Basic and Supplement Requirement of NQA-1.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
14b.	B.15(1)	Exception not retained. Note 2.	N	
14c.	B.15(3)	Exception not retained. Note 2.	N	
15a.	B.3(3)	Exception not retained. Note 2. RG 1.64 withdrawn.	I	Deletion of allowance for procedure control in lieu of individual approval is an increase. Design verification process still meets Appendix B.
16a.	C.3(1)	Exception not retained. RG 1.144 withdrawn	N	
16b.	B.4, C.3	Exception not retained. RG 1.144 withdrawn.	N	
16c.	B.4(4)	Exception retained consistent with RG 1.28. RG 1.144 withdrawn.	N	
16d.	B.4(4)	Exception retained. RG 1.144 withdrawn.	N	
17a.	B.4(2)(7)	Exception retained. Note 2. N45.2.13 incorporated into Basic and Supplemental Requirements of NQA-1.	N	
17b.	B.4(5)(8)	See QAPD item 2.I.	N	
17c.	B.4(8)	Exception not retained. Note 2. N45.2.13 incorporated into Basic and Supplemental Requirements of NQA-1.	N	
17d.	B.4(3)	Exception not retained. Note 2. N45.2.13 incorporated into Basic and Supplemental Requirements of NQA-1.	N	
17e.	A.5	Exception not retained. N45.2.13 incorporated into Basic and Supplemental Requirements of NQA-1.	N	
17f.	B.4(8)	Exception retained. N45.2.13 incorporated into Basic and Supplemental Requirements of NQA-1.	N	
17g.	B.8	Exception not retained. N45.2.13 incorporated into Basic and Supplemental Requirements of NQA-1.	N	
18a.	A.5(2)	Exception retained. N45.2.23 incorporated into Basic and Supplemental Requirements of NQA-1.	N	
19a.	A.1(4), A.7.3(3)	Exception retained. Note 2.	N	
20a.	A.7.3(18)	Note 2. Reference to 10CFR50, Appendix R is not in the QATR.	R	Appendix R commitments are addressed in the UFSAR and are not required by Appendix B. Therefore the QATR meets applicable requirements.
21a.	A.1(4), A.7.3(5)	Exception retained.	N	
21b.	A.1(4), A.7.3(5)	Exception retained.	N	
22.	NA	See discussion for Appendix C of the QAPD.	R	See Enclosure 6.

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
Appendix B				
B1	App A, 1.0	Site Vice President replaced by Plant Manager.	R	Previous industry guidance provided for onsite reviews established the Plant Manager as the focal point. Appendix B does not address onsite reviews, therefore the QATR continues to meet Appendix B.
B2	App A, 2.0 A.7.3	Note 2	R	10CFR50 Appendix B does not address PORC. QATR provides for establishing (similar) requirements at the procedure level.
B3	App A, 2.0, 3.0	Note 3.	N	
B4	App A, 3.0	Note 3. Minimum meeting frequency to be established in implementing procedures.	R	Previous industry guidance for PORC did not address meeting frequency. Appendix B does not address onsite reviews, therefore the QATR continues to meet Appendix B.
B5	App A, 3.0	Note 3. Quorum requirements to be established in implementing procedures.	R	Previous industry guidance for PORC did not address quorum requirements. Appendix B does not address onsite reviews, therefore the QATR continues to meet Appendix B.

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
B6(a)	App A, 4.0(1) B.14(1)	Note 2. PORC review of procedures is deleted based on NRC SER dated August 11, 1999, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 190 to Facility Operating License No. DPR-24 and Amendment No. 195 to Facility Operating License No. DPR-27, Wisconsin Electric Power Company Point Beach Nuclear Plant, Units 1 and 2, Docket Nos. 50-266 and 50-301." PORC review of "programs" reduced to those common to all current QAPDs at NMC plants.	R	Deletion of PORC review of procedures is consistent with the provisions of the cited SER, and the necessary review requirements are included in section B.14 of the QATR. The provisions for procedure review and approval continue to meet Appendix B requirements. Appendix B does not address PORC activities. The previous industry guidance for this function was not explicit regarding PORC review of specific programs. Reduction to the set common to all NMC plants provides consistency. The QATR continues to meet Appendix B.
B6(b)	App A, 4.0(2)	Note 2.	N	
B6 (c)	App A, 4.0(6)	Requirement for report to CNO shifted to onsite management positions above the Plant Manager. See discussion for QAPD Appendix C regarding OSRC.	R	Appendix B does not address PORC activities, so the QATR continues to meet Appendix B.
B6(d)(e)	App A, 4.0(7)	Note 3.	N	
B6(f)(g)(h)	App A, 4.0(1)	Note 3 PORC review of "programs" reduced to those common to all current QAPDs at NMC plants.	N	Appendix B does not address PORC activities. The previous industry guidance for this function was not explicit regarding PORC review of specific programs. Reduction to the set common to all NMC plants provides consistency. The QATR continues to meet Appendix B.
B6(i)	App A, 5.0	New QATR requires subcommittees report to full committee. This is equivalent to previous requirement.	N	
B6(j)	App A, 4.0(9)	QATR adds modifier "significant."	N	
B6(2)	NA App A, 5.0	Note 3. Allowance for routing review neither specified nor prohibited by new QATR.	N	

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
B7(a)	App A, 5.0	Plant Manager replaces SVP.	N	
B7(b)	App A, 5.0	Note 2.	N	
B7 (c)	App A, 5.0	Note 3. 24 hour timing not retained.	R	Appendix B does not address PORC or the specifics of notifying senior management of disagreements. Thus the QATR continues to meet Appendix B.
B7(2-4)	App A, 5.0	Routing review allowance not addressed (nor prohibited) in QATR. Note 3.	R	Appendix B does not address PORC or the specifics of how its reviews should be conducted. Thus the QATR continues to meet Appendix B.
B8	App A, 6.0	See discussion for QAPD Appendix C regarding OSRC.	N	
B9	App A, 5.0	Note 3.	N	
B9.1	App A, 5.0	Note 3.	N	
B9.2	App A, 5.0	Note 3.	N	
B9.3	App A, 5.0	Note 3.	N	
B9.4	App A, 5.0	Monthly periodicity not retained. Instead, regular reporting is required.	R	Appendix B does not address PORC activities. Thus the QATR continues to meet Appendix B.
Appendix C	NA	The QATR does not provide requirements for Offsite Safety Review Committee.	R	See Enclosure 6.
Appendix D	C.3(1) Table 1 Table 2	The QATR replaces most audits at defined frequencies with performance based assessments. Certain topics retain designated frequencies where required by regulation. In addition, the previous 1, 2 and 3-year fire protection assessments are replaced by a 2-year assessment using a qualified fire protection specialist. See discussion for QAPD Appendix C regarding OSRC.	R	Appendix B requires a "system of planned and periodic audits." The provisions of the QATR provide for such a system in a manner that assures appropriate topic coverage using both a defined frequency and a performance-based approach. The change in fire protection frequency is supported by NRC approval on 8/30/96 for the same change made by PECO Nuclear for its Limerick and Peach Bottom plants.

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Current QAPD Section (paragraph)	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
Appendix E	B.15	This list of records and retention periods is replaced by NQA-1-1994, Basic Requirement 17 and 17S-1, with the guidance of RG 1.28. However, the explicit items and retention periods of the QAPD are not presented in the QATR. Note 2.	R	NRC has endorsed the requirements of NQA-1, via RG 1.28, as an acceptable means of compliance with Criterion 17 of Appendix B. Therefore, the QATR will continue to meet applicable records requirements.
	B.16	The current QAPD does not address Plant Maintenance as specifically as this section and its commitment to NQA-1, Subpart 2.18.	I	
	B.17	The current QAPD does not address Computer Software Quality Assurance as explicitly as this section and its commitment to NQA-1, Subpart 2.7.	I	
	A.7.3 RIS-2000-18	The current QAPD does not address use of electronic media for records management or storage. This is a new commitment.	I	

NOTES:

1. R = Reduction in Commitment.
N = Not a Reduction in Commitment.
I = Increase in commitment.
2. Wording in the QATR and commitments to detailed requirements of NQA-1-1994 establish equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to Standard Review Plan 17.3 format. 10CFR50.54(a)(3)(i) or (v) apply.
3. Methodology details in the current program description may not be included in the NMC QATR. The intent of the QATR is to describe appropriate/sufficient requirements to establish how the quality assurance program meets 10CFR50, Appendix B, but to allow flexibility in the manner by which a requirement is met. Therefore, this change in methodology detail is not considered to be a reduction in commitment.

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
1.4(1)	Introduction A.1(1) A.7.1 A.7.2	Note 2	N	
1.4(2)	A.1(3) A.1(4) A.1(5)	Note 2	N	
1.4(3)	A.1(7)	Note 2	N	
1.4(4) 1.4(5) 1.4(6)	A.7.3	The list of items addressed is effectively the same with the update to NQA-1 and the addition of RG 1.2. Administrative controls associated with N18.7 are included within the text of the QATR (see 18.7 Matrix). FSAR 1.4(6) states that the PBNP SSCP meets or exceeds N18.17. Since PBNP's SSCP has been approved by the NRC and is outside the scope of Appendix B, there is no reduction in commitment.	N	
1.4.1 Figure 1.4-1	A.2 A.2.1 A.2.2 B.1	Note 2. QATR does not have a chart or figure, but establishes responsibilities and reporting relationships in text.	N	
1.4.2(1)	None	The QATR does not describe site specific sub-tier implementing documents by name nor their approval process	R	FSAR 1.4.2 establishes a CNO-NMC approval authority for the NQAP. This is a reduction commitment. The NQAP implements FSAR 1.4. It is not the PBNP QA Program. Therefore not including its description in the QATR is not a reduction in commitment.
1.4.2(2)	A.2(2) A.2.1.2	Note 2	N	
1.4.2(2)	None	The QATR does not provide requirements for OSRC	R	See Enclosure 6.

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
1.4.2(3)	A.1(3) A.1(4)	Note 2	N	
1.4.2(4) 1.4.2(5)	A.1(4) A.1(5)	Note 2	N	
1.4.2(6)	A.5 A.7.3 B.15	Note 2	N	
1.4.2(7)	B.7(3)	Note 2	N	
1.4.2(8)	B.7(3) B.7(4)	The QATR does not assign housekeeping areas to site working groups.	R	Appendix B does not require site working groups be assigned housekeeping areas. The QATR establishes the necessary commitment to housekeeping practices.
1.4.2(9)	B.7(4) B.12(1) B.16	Note 2	N	
1.4.2(10)	B.7	Note 2	N	
1.4.2(11)	None	QATR does not describe commitment to physical safety and environmental conditions of work places.	R	Appendix B does not require sites to establish physical safety and environmental conditions of work places. The applicable requirements from other sources are met in site implementing procedures.
1.4.3(1)	B.2(1) B.2(2) B.2(4) B.3(3) B.16(1) B.17	Note 2	N	
1.4.3(2)	B.2(1) B.3(1)	Note 2	N	
1.4.3(3)	B.3(1) B.3(3)	Note 2	N	
1.4.3(4)	B.3(1) B.17	Note 2	N	

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
1.4.3(4)	B.2(2) B.2(4)	Note 2	N	
1.4.4	B.4 B.5 B.15	Note 2	N	
1.4.5(1)	B.2(1) B.14	Note 2	N	
1.4.5(2)	Appendix C	The QATR does not specify Supervisor responsibilities of acceptance criteria data taking and verification of the data and the use of OE to establish acceptance criteria.	R	Personnel are trained on how to use procedures, including those containing acceptance criteria. Development of acceptance criteria is performed using internal and external operating experience and vendor information. See Note 3.
1.4.5(3)	B.14(2)	Note 2		
1.4.5(4)(5)(6)	B.14	Note 2	N	
1.4.5(7)	C.3(1)	The QATR requires assessments be based on status, performance, and effect on safety of the activity.	R	Procedures will continue to be assessed as part of regular assessments scheduled per QATR C.3. As such, a random sample of procedures to be audited every two years will be accomplished on a continuing basis.
1.4.5(8)	B.14(1)	The QATR does not specifically define IPTEs. Note 3.	R	
1.4.5(9)	None	Various applicable CFRs and Technical Specifications define review frequency requirements for these specific procedures.	N	
1.4.5(10)	B.14(1) Appendix C	Note 2	N	
1.4.6(1)(2)	B.14	Note 2	N	
1.4.6(3)	B.15(1) B.15(2)	Note 2	N	
1.4.7	A.5 B.4	Note 2	N	

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
	B.5 C.5			
1.4.8	B.6 B.7(1) B.12(1)	Note 2	N	
1.4.9	B.5 B.11 B.12(3)	FSAR 1.4.9 requires copies of qualifications to be on site during process performance. For the remainder, see Note 2, 3.	R	The QATR states that special processes are accomplished using qualified personnel.
1.4.10(1)	B.12(1)	Note 2	N	
1.4.10(1)bullets 1-4	B.12(2)	Note 2	N	
1.4.10(1) bullet 5	B.12(3)	Note 2	N	
1.4.10(2)	B.12(4)	Note 2	N	
1.4.10(3)	A.5 B.12(1)	Note 2	N	
1.4.10(4)	B.4 B.5	Note 2	N	
1.4.10(5)	B.12(1)	Note 3	N	
1.4.10(6 and 7)	B.12(X)	Note 2	N	
1.4.10(8)	B.4 B.12(X)	Note 2	N	
1.4.10(9)	B.12(1)	Note 3	N	
1.4.10(10)	B.12(1)	Note 2	N	
1.4.10(11)	B.12	Note 3	N	
1.4.11	A.5(1) B.2(1)	Note 2	N	The last sentence of QATR B.8 is does not establish a new or different require-ment. It

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
	B.8 B.14(1) Appendix C			states the commitment to assure applicable equipment is not put into service until successfully tested. This concept is inclusive to FSAR 1.4.11.
1.4.12	B.9	The bullets in B.9 are not explicitly described in FSAR 1.4.12. They are industry standard practices not described in FSAR 1.4.12.	I	
1.4.13	A.5(1) B.7 B.16	Methodology details described in QATR B.7 are not explicitly described in FSAR 1.4.13.	I	
1.4.14	B.10 B.16(1)	Note 2 B.10 states that workmen's protection provisions comply with federal, state, and OSHA regulations. Although not QA related, federal and state safety regulations are implemented via site procedures.	N	
1.4.15	A.6(3) A.6(4) B.2(1) B.2(2) B.13(1)	Note 2	N	
1.4.16	A.2 A.6 B.13(1)	Note 2. The QATR does not explicitly address "follow-up reviews to ... close out the corrective action documentation."	N	Documentation close-out and retention is required by QATR B.15, which meets criterion 17 of Appendix B.
1.4.17(1)	B.2(3) B.15	Note 2	N	
1.4.17(2)	A.5(1) B.15	Note 2	N	
1.4.17(3)	B.15(2)	Note 2	N	
1.4.18(1)	C.3(1)	Note 2	N	
1.4.18(2)	C.3(1)	1.4.18 states that NOS performs audits under the cognizance of the JOSRC (or	R	See Enclosure 6

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
		OSRC). The QATR does not require a OSRC be established		
1.4.18(3)	C.3(1)	Note 2	N	
1.4.18(4)	C.3(2)	Note 2	N	
1.4.18(5)	A.5 C.3(1) Table 1 Table 2	<p>QATR replaces audits at defined frequencies with performance-based assessments unless required by regulation. In addition, the previous 1, 2, and 3 year fire protection assessments are replaced by a 2 year assessment using a qualified fire protection specialist.</p> <p>QATR replaces auditor qualifications per N45.2.23 with NQA-1, 2S-3, with an exception regarding the number of audits needed for qualification.</p>	R	<p>Appendix B requires a “system of planned and periodic audits.” The provisions of the QATR provide for such a system in manner that assures appropriate topic coverage using both a defined frequency and a performance-based approach. The change in fire protection frequency is supported by NRC approval on 8/30/96 for the same change made by PECO Nuclear for its Limerick and Peach Bottom plants.</p> <p>The QATR process for auditor qualification establishes a performance based qualification process. Appendix B does not require a qualification process based on the number of assessment conducted by the lead auditor candidate. See Enclosure 3.</p>
None	B.16(1)	QATR explicitly describes various maintenance activities. Activities affecting maintenance are implied in applicable sections of FSAR 1.4.	I	Appendix B does not explicitly describe maintenance activities.
1.4.19.1	Appendix A 1.0	Note 2	N	
1.4.19.2	Appendix A	1.4.19.2 lists Licensing and Training as	R	Appendix B does not address PORC. The

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
	2.0	possible members of PORC. The QATR does not list these groups. Note 3		Plant Manager may require qualified individuals from Licensing and Training, or other disciplines, be members of PORC. If so, their membership will be documented in implementing procedures.
1.4.19.3	A.5(1) A.7.3(1)	Note 2	N	
1.4.19.4	A.5(1) A.7.3(1)	Note 2	N	
1.4.19.5	App A 3.0	Note 3. Minimum meeting frequency to be established in implementing procedures.	R	Previous industry guidance for PROC did not address meeting frequency. Appendix B does not address onsite reviews, therefore the QATR continues to meet Appendix B.
1.4.19.6	App A 3.0	Note 3 Quorum requirements to be established in implementing procedures	R	Previous industry guidance for PROC did not address quorum requirements. Appendix B does not address onsite reviews, therefore the QATR continues to meet Appendix B.
1.4.19.7	None	Requiring a List of PORC members be maintained and updated annually is not described in the QATR. PORC membership is documented in implementing procedures. Note 3	R	Appendix B does not address PORC. QATR Appendix A, 2.0 establishes membership requirements.
1.4.19.8	B.14 (1) App A 4.0	PORC review of procedures is deleted based on NRC SER dated August 11, 1999, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 190 to Facility Operating Licensing No. DPR-27, Wisconsin Electric Power Company Point Beach Nuclear Plant, Unit s 1 and 2, Docket Nos. 50-266 and 50-301." PORC review of "programs" reduced to those common to all current QAPDs at	R	Deletion of PORC review of procedures is consistent with the provisions of the cited SER, and the necessary review requirements are included n Section B.14 of the QATR. The provisions for procedure review and approval continue to meet Appendix B requirements. Appendix B does not address PORC

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
		NMC plants.		activities. The previous industry guidance for this function was not explicit regarding PORC review of specific programs. Reduction to the set common to all NMC plants provides consistency. The QATR continues to meet Appendix B.
1.4.19.9	App A 1.0 App A 5.0 App A 6.0 B.15	Note 2 1.4.19.9 describes the JOSRC (or OSRC) relationship to PORC. The QATR does not require the establishment of a JOSRC. The QATR requires subcommittees report to full committee. QATR establishes routing of PORC minutes to the onsite management above the Plant Manager.	N R I R	See Enclosure 6. Appendix B does not address PORC or the specifics of how its reviews should be conducted or routed. Thus the QATR continues to meet Appendix B.
1.4.20	None	The QATR does not require the establishment of a JOSRC (or OSRC).	R	See Enclosure 6.
Table 1.4-1	A.7.3	The list of items addressed is effectively the same with the update to NQA-1 and its effect on Regulatory Guides.	N	
Table 1.4-2	A.1(4 and 5)	The table describes augmented quality characteristics assigned to the process or system.	R	Note 3
Table 1.4-3	A.1(4 and 5)	The table describes augmented quality characteristics assigned to the process or system.	R	Note 3
Table 1.4-4	A.1(4 and 5)	The table describes augmented quality characteristics assigned to the process or system.	R	Note 3
Table 1.4-5 1.A	B.14(1) B.14(2)	Note 2	N	
Table 1.4-5 1.B	A.5	Note 2	N	

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
	A.7.3(3) B.14(1) B.14(2)			
Table 1.4-5 1.C	A.5 A.7.3(3) B.14(1) B.14(2)	Note 2	N	
Table 1.4-5 1.D	B.14(1) B.14(2)	Note 2	N	
Table 1.4-5 2.A	B.14(1) B.14(2)	Note 2	N	
Table 1.4-5 2.B	B.14(3)	Note 2	N	
Table 1.4-5 2.C	B.14(3)	The additional approval requirements within the two week period described in Table 1.4-5 2.C is not contained in the QATR. Approval of temporary procedure changes is described in B.14	R	Appendix B does not require subsequent reviews of temporary procedure changes as described in the first sentence of Table 1.4-5 2.C. Temporary change review process is described in B.14. Therefore, the QATR will continue to meet applicable temporary procedure change review and approval requirements.
Table 1.4-6	B.15	The list of records and retention periods is replaced by NQA-1-1994, Basic Requirement 17 and 17S-1, with the guidance of RG 1.28. However, the explicit items and retention periods of the QAPD are not presented in the QATR. Note 2	R/N/I	NRC has endorsed the requirements of NQA-1, via RG 1.28, as an acceptable means of compliance with Criterion 17 of Appendix B. Therefore, the QATR will continue to meet applicable record requirements.
Figure 1.4-1	None	The QATR does not provide charts. The descriptions provided in A.2 provide explicit reporting relationships. Note 2	N	
None	B.17	The current QAPD does not address Computer Software Quality Assurance as explicitly as this section and its commitment to NQA-1, Subpart 2.7.	I	

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Current FSAR 1.4 Section (Paragraph)	QATR Section (Paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
None	A.7.3 RIS-2000-18	The current QAPD does not address use of electronic media for records management or storage. This is a new commitment.	I	

NOTES:

1. R = Reduction in Commitment
N = Not a Reduction in Commitment
I = Increase in Commitment
2. Wording in the QATR and commitments to detailed requirements of NQA-1-1994 established equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to Standard Review Plan 17.3 format. 10 CFR 50.54(a)(3)(i) or (v) apply.
3. Methodology details in the current description may not be included in the NMC QATR. The intent of the QATR is to describe appropriate/sufficient requirements to establish how the quality assurance program meets 10 CFR 50, Appendix B, but to allow flexibility in the manner by which a requirement is met. Therefore, this change in methodology detail is not considered to be a reduction in commitment.

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Ref: Xcel Energy – Operational Quality Assurance Plan, Revision 25, effective date: 5/08/2003
NMC QATR [Rev. 0a, October 10,2003]

General Note – The Xcel OQAP included Fire Protection Program requirements throughout the body of the document. Fire Protection Program requirements are not part of the NMC QATR. Therefore, all references to Fire Protection will be transferred to separate site documents. Specific Fire Protection references are not detailed in the Table below. QATR commitment to Quality Assurance requirements for Fire Protection made in A.7.3, Branch Technical Position CMEB 9.5-1.

Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Continuing to Meet Appendix B
1.1	Policy Statement	Note 2	N	
1.2	Policy Statement, A.7.1 & A.7.2	Note 2	N	
1.3	A.7.3	Note 2 The OQAP commitments to ANSI N18.7 and the ANSI N45.2 series of standards are replaced as described in the QATR by commitment to NQA-1-1994.	N	
1.4	A.1 (1, 3)	Note 2	N	
1.5	A.1, A.5	Note 2	N	
1.6	A.3(2) C.1 (1, 3) C.3 (3),	Note 2 Referenced sections equivalent to CNO periodic review of OQAP.	N	
2.0	A.1 (2)	Note 2	N	
3.1	A.1, A.2, A.4	Note 2	N	
3.2	A.2.1, A.2.2, A.3, A.4	Note 2 The QATR does not provide charts. The descriptions provide explicit reporting relationships.	N	
4.1	Policy Statement, A.1, A.5, A.3, B.7, B.11, B.12, C.1	Note 2	N	
4.2	A.1, A.2	Note 2	N	
4.3	A.1, A.2, A.2.1, B.1, B.14, C.1 (1, 3), C.3 (3),	Note 2 Referenced sections equivalent to 4.3.2 periodic review of OQAP.	N	
4.4	A.1, B.1	Note 2, Note 3	N	
4.5	A.1 (3, 4)	Note 2 , Note 3	N	
4.6	A.1 (3, 4)	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
4.7	A.2, A.2.1.2.b	Note 2, Note 3 4.7.2 – Dispute resolution not discussed in QATR.	R	Dispute resolution is not discussed in Appendix B. The QATR specifies organization and responsibilities that meet Appendix B.
4.8	A.1 (4), B.14(1)	List of structure system components has been removed from QATR. Criteria provided for determining list are included in A.1(4).	R	Programs (lists) are included in plant specific documents. This meets Appendix B requirements to identify applicable SSCs.
4.9	A.3 (3), A.5 (1)	Note 2	N	
5.1	B.2	Note 2	N	
5.2	A.1, B.2, B.3	Note 2	N	
6.1	B.4 (1)	Note 2	N	
6.2	A.1, A.7.1, A.7.3, B.4 (1, 4), B.5 (1)	Note 2 Note 3	N	
6.3	B.4	Note 2, Note 3 Approvals by management are not specifically stated in the QATR.	R	Reviews imply approvals. This is an administrative requirement. The QATR provides for reviews of procurement documents to assure the requirements of Appendix B are met.
6.4	A.7.3 (BTP CMEB 9.5-1)	Note 2	N	
7.1	A.1 (3, 6)	Note 2	N	
7.2	A.1 (3), B.14 (1), Appendix B(2)	Note 2	N	
7.3	A.1 (8), B.14 (1), Appendix,B B.11 (1)	Note 2	N	
7.4	A.1 (6)	Note 2	N	
8.1	B.14 (1, 2), B.16	Note 2	N	
8.2	A.3 (5), B.1, B.14 (1, 2)	Note 2	N	
8.3	A.3 (5), B.1, B.14 (1, 2)	Note 2	N	
8.4	B.14 (1, 2, 3)	Note 2, Note 3	N	
8.5	A.1 (6), B.14 (1)	Note 2, Note 3	N	
8.6	B.2 (1)	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
8.7	A.1 (4), B.14, A.7.3 (Reg Guide 7.10), Appendix B	Note 2	N	
8.8	B.14	Note 2	N	
8.9	B.14 (1)	Note 2	N	
9.1	B.4, B.5 (1)	Note 2	N	
9.2	A.1, B.4	Note 2	N	
9.3	B.4 (3 rd bullet)	Note 2	N	
9.4	B.12 (1), B.4 (5 th bullet)	Note 2	N	
10.1	B.6 (1)	Note 2	N	
10.2	B.6 (1), B.7 (1)	Note 2	N	
10.3	B.6 (1), B.7 (1)	Note 2	N	
10.4	B.12 (1), B.4 (5 th bullet), B.13	Note 2	N	
10.5	None	No specific reference for protection against theft or diversion in new QATR.	R	Meets 10CFR50 App. B requirements. Security Plan addresses theft/diversion of nuclear fuel.
11.1	B.11 (1)	Note 2	N	
11.2	A.1 (6), B.11	Note 2, Note 3 Braze not specifically referenced in QATR	R	The definition of Special Processes in the QATR encompasses the examples not listed, and the list included matches 10 CFR 50, App. B.
11.3	A.5 (1), B.11 (2)	Note 2 NQA-1, Basic Requirement 9, Supplement 9S-1 requires qual of personnel.	N	
11.4	A.1 (6), B.11 (1, 2)	Note 2, Note 3 Heat Treating not specifically referenced in QATR	R	The definition of Special Processes in the QATR encompasses the examples not listed, and the list included matches 10 CFR 50, App. B.
12.1	A.1 (4, 5), B.10 (1), B.12 (1, 2), App. B(Test & Inspection Proc.)	Note 2	N	
12.2	B.10 (1), B.12 (1, 2), App. B(Fuel Handling Proc.)	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
12.3	A.5 (1), B.12 (1, 2)	Note 2 NMC commits to NQA-1 for qualifications	N	
12.4	B.12 (1), B.16	Note 2, Note 3	N	
12.5	A.5 (1, 2), B.12 (1, 3), B.16	Note 2 Qualifications per NQA-1	N	
12.6	A.5 (1), B.12 (1)	Note 2, Note 3 Technical Services not specifically mentioned in QATR	R	Technical Services are not specified in Appendix B. The QATR provides for inspections that meet Appendix B.
12.7	A.5 (1), B.4 (5 th bullet)	Note 2 Qualifications per NQA-1	N	
12.8	A.5, B.4 (1), B.5 (1), B.12	Note 2 Qualifications per NQA-1	N	
12.9	A.7.3	Note 2 General inspection measures listed in B.4, B.10 and B.12.	N	
12.10	A.1 (4)	Note 2	N	
12.11	A.1(5) A.12	Note 3 Emergency Equipment inspections not specifically addressed in QATR	R	The QATR established requirements for inspections that meet Appendix B.
12.12	A.5, B.7 (2 - 3 rd bullet)	Note 2	N	
12.13	A.5 (2), B.11	Note 2, Note 3 Specific NDE methods are not listed in the QATR, but are as listed in SNT-TC-1A and/or CP-189.	N	
12.14	B.12, App. B(Test & Insp. Procedures)	Note 2	N	
13.1	B.8, B.10, Appendix B (Test & Insp. Procedures)	Note 2	N	
13.2	A.5, B.8 (1), Appendix B (Test & Insp. Procedures)	Note 2	N	
13.3	B.8 (1)	Note 2	N	
13.4	B.4 (5 th bullet), B.8 (1)	Note 2 OQAP – requires completion of proof tests prior to installation. QATR – requires proof test completion prior to operability.	R	Appendix B, Criterion VII, requires tests prior to installation <u>or</u> use, The QATR meets this requirement..

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
13.5	B.8, Appendix B (Test & Insp. Procedures)	Note 2 Note 3	N	
13.6	A.5 (1)	Note 2	N	
14.1	B.9 (1)	Note 2	N	
14.2	B.9 (1)	Note 2	N	
14.3	B.9 (1 – 4 th bullet)	Note 2 National Institute of Standards & Technology (NIST) is specified in OQAP, but not QATR. However, the “national standards” wording in the QATR provides necessary control.	R	Appendix B requires that M&TE be properly controlled, calibrated, etc, to maintain accuracy within specified limits. The QATR provides controls that meet this requirement.
15.1	B.7 (1)	Note 2	N	
15.2	B.7	Note 2	N	
15.3	B.7	Note 2 No specific reference to nuclear fuel storage in QATR	R	10CFR50 App. B does not specify fuel storage requirements.
15.4	B.7	Note 2 No specific reference to radioactive material storage in QATR	R	10 CFR 20 encompasses radioactive material storage requirements.
15.5	B.7	Note 2	N	
15.6	B.7	Note 2	N	
15.7	A.1 (4), B.7 (3 rd bullet)	Note 2	N	
16.1	B.10	Note 2	N	
16.2	B.16	Note 2, Note 3	N	See NQA-1, Subpart 2.18, para 2.5(c) for ref to ALARA
16.3	B.8, B.10	Note 2	N	
16.4	B.10	Note 2, Note 3	N	
16.5	B.10	Note 2, Note 3 No specific reference to key control in QATR	R	Security related Key control is covered in the Site Security Plan. The QATR provides for control measures that meet Appendix B, Criterion 14.
16.6	B.2(4) B.10	Note 2, Note 3	N	
16.7	A.7.1	Note 2, Note 3 Radioactive Material control is not detailed in the QATR.	R	This is not an Appendix B topic. Site program procedures include rad material control.
16.8	App. B (Start-up Procedures)	Note 2	N	
17.1	A.6 (3), B.6, B.13	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
17.2	B.4 (4 th and 5 th bullets), B.13 (3)	Note 2, Note 3	N	
17.3	B.13 (3)	Note 2 , Note 3	N	
17.4	B.13	Note 2 , Note 3	N	
17.5	A.6, B.13	Note 2	N	
17.6	A.7.1, A.2.1.2	Note 2	N	
18.1	A.6 (2), B.13	Note 2	N	
18.2	A.6 (2), B.13	Note 2, Note 3	N	
18.3	C.3 (2)	Note 2	N	
19.1	B.15 (1, 2)	Note 2, Note 3	N	
19.2	B.15 (3)	Note 2, Note 3	N	
19.3	B.15 (1)	Note 2	N	
19.4	B.15 (1)	Note 2	N	
19.5	A.5 (1), B.15 (1)	Note 2	N	
19.6	B.4 (4 th bullet), B.15 (1)	Note 2	N	
19.7	B.8, B.15 (1)	Note 2	N	
19.8	C.3 (3), B.15 (1)	Note 2	N	
19.9	B.15	Note 2, Note 3	N	
19.10	B.2 (3), B.14 (1), B.15 (1)	Note 2	N	
19.11	B.15	Note 2	N	
19.12	B.15 (2)	Note 2, Note 3 Retention times for operating records are not specified in QATR, but are specified in OQAP.	R	Retention times are required to be specified in RMS procedures, per NQA-1, Supplement 17S-1, 2.8. The requirements of NQA-1 for records maintenance have been endorsed by the NRC via RG 1.28 as meeting Appendix B requirements. Therefore, the QATR, which commits to NQA-1, continues to meet Appendix B.
20.1	C.1 (2), C.3 (2, 3)	Note 2	N	
20.2	C.3 (1, 3)	Note 2	N	

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
20.3	C.3 (1)	Note 2 The QATR replaces audits at defined frequencies (maximum of 2 years) with performance-based assessments (dynamic schedule frequencies). Certain topics retain designated frequencies where required by regulation.	R	10CFR50, App. B requires a system of planned and periodic audits. The provisions of the QATR provide for such a system in a manner that assures appropriate topic coverage using both a defined frequency and a performance-based approach.
20.4	C.1 (2, 4)	Note 2	N	
20.5	C.3 (2, 3)	Note 2	N	
20.6	C.3 (3)	Note 2, Note 3 QATR does not specify who resolves disputes.	R	Dispute resolution is not discussed in Appendix B. See 4.7, above.
21.0	N/A	The QATR does not provide requirements for Offsite Safety Review Committee.	R	See Enclosure 6.
22.1	Appendix A (2.0, 3.0)	Note 2, Note 3 QATR requires member appointment by the Plant Manager.	N	
22.2	Appendix A (3.0)	Note 2, Note 3 QATR says minimal frequency will be specified in procedures.	R	Previous industry guidance for PORC did not address meeting frequency. Appendix B does not address onsite reviews, therefore the QATR continues to meet Appendix B.
22.3	Appendix A (3.0)	Note 2, Note 3 QATR references quorum will be established per procedure.	R	Previous industry guidance for PORC did not address quorum requirements. Appendix B does not address onsite review, therefore the QATR continues to meet Appendix B.
22.4	Appendix A (4.0)	Note 2, Note 3 QATR does not cover topics in 2.2.7/9/10/11/13, nor results of tests and experiments per 22.4.1. PORC review of procedures is deleted based on NRC SER dated August 11, 1999, "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 190 to Facility Operating License No. DPR-24 and Amendment No. 195 to Facility Operating License No. DPR-27, Wisconsin Electric Power Company Point Beach Nuclear Plant, Units 1 and 2, Docket Nos. 50-266 and 50-301."	R	10CFR50, App. B does not specify any required reviews, however, the reviews specified are consistent with previous industry guidance for what offsite reviews should cover. Deletion of PORC review of procedures is consistent with the provisions of the cited SER, and the necessary review requirements are included in section B.14 of the QATR. The provisions for procedure review and approval continue to meet Appendix B requirements.

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Current OQAP Section	QATR Section (paragraph)	Δ's	R/N/I (Note 1)	Basis for QATR as Changed Continuing to Meet Appendix B
22.5	Appendix A (5.0)	Note 2, Note 3 QATR does not describe the process to resolve disagreements. QATR does not require notification of disagreement to OSRC.	R	This is not addressed by Appendix B.
22.6	Appendix A (6.0)	Note 2, Note 3 QATR doesn't specify the additional distribution requirements cited in the OQAP	R	Appendix B does not specify requirements for onsite reviews.
22.7	Appendix A (1.0)	Note 2, Note 3	N	
Appendix B – Systems, and Components Subject to Appendix B of 10CFR50	A.1 (4)	Note 2, Note 3 QATR references "A list, or other means of identification, of safety related Systems, Structures, and Components (SSC) under the control of the QAP is established and maintained for each operating plant."	R	List will be relocated at PINGP, outside of the QATR.
Appendix C – Nuclear Plant Fire Protection Program	Fire Protection Program is not included in the QATR. Table 2 for Fire Protection Audit frequency.	Note 2, Note 3 The previous 1, 2 and 3-year fire protection assessments, per 14.0, are replaced by a 2-year assessment using a qualified offsite fire protection specialist.	R	Fire Protection program will be relocated at PINGP outside of the QATR. The change in fire protection frequency is supported by NRC approval on 8/30/96 for the same change made by PECO Nuclear for its Limerick and Peach Bottom plants.
None	B.16	Control of Plant Maintenance is not addressed in the OQAP.	I	
None	B.17	Computer Software Control is not addressed in the OQAP.	I	
None	A.7.3 (RIS 200-18)	Electronic records are not addressed in the OQAP.	I	
None	C.2	Self-assessment is not addressed in the OQAP.	I	

NOTES:

1. R = Reduction in Commitment.
N = Not a Reduction in Commitment.
I = Increase in commitment.
2. Wording in the QATR establishes equivalent requirements or commitments. Any wording difference is the result of format needs associated with changing to Standard Review Plan 17.3 format. 10 CFR 50.54(a)(3)(i) and/or (v) apply.
3. Methodology details in the current program description may not be included in the NMC QATR. The intent of the QATR is to describe appropriate/sufficient requirements to establish how the quality assurance program meets 10CFR50, Appendix B, but to allow flexibility in the manner by which a requirement is met. Therefore, this change in methodology detail is not considered to be a reduction in commitment.