



U.S. NUCLEAR REGULATORY COMMISSION

STANDARD REVIEW PLAN

OFFICE OF NUCLEAR REACTOR REGULATION

17.2 QUALITY ASSURANCE DURING THE OPERATIONS PHASE

REVIEW RESPONSIBILITIES

Primary - ~~Quality Assurance Branch (QAB)~~ Quality Assurance and Maintenance Branch (HQMB)¹

Secondary - Mechanical Engineering Branch (EMEB)²
~~Instrumentation & Control Systems Branch~~ Instrumentation and Controls Branch (HICB)³
~~Power Systems Branch~~ Electrical Engineering Branch (EELB)⁴
~~Accident Evaluation Branch~~
~~Radiological Assessment Branch~~ Emergency Preparedness and Radiation Protection Branch (PERB)⁵
~~Hydrologic & Geotechnical Engineering Branch~~ Civil Engineering and Geosciences Branch (ECGB)⁶
~~Containment Systems Branch~~ Containment Systems and Severe Accidents Branch (SCSB)⁷

I. AREAS OF REVIEW

~~QAB~~HQMB⁸ reviews and evaluates the applicant's operational quality assurance (QA) program as described in the final safety analysis report (FSAR).⁹ The review at the operating license stage addresses both the "offsite" and "onsite" QA controls to be applied to those activities that may affect the quality of items important to safety during the operation, maintenance, and modification of a nuclear power plant. The review covers the QA controls to be applied to those activities (e.g., designing, constructing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, maintaining, modifying, operating, inspecting, and testing) that may affect the quality of structures, systems, and components important to safety. SRP Sections

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USNRC STANDARD REVIEW PLAN

Standard review plans are prepared for the guidance of the Office of Nuclear Reactor Regulation staff responsible for the review of applications to construct and operate nuclear power plants. These documents are made available to the public as part of the Commission's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Standard review plans are not substitutes for regulatory guides or the Commission's regulations and compliance with them is not required. The standard review plan sections are keyed to the Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants. Not all sections of the Standard Format have a corresponding review plan.

Published standard review plans will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience.

Comments and suggestions for improvement will be considered and should be sent to the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Washington, D.C. 20555.

17.1 and 17.2 provide guidelines for review of programs based upon ANSI N45.2 (Reference 41*) and its daughter standards. SRP Section 17.3 provides guidelines for review of a QA Program developed following ASME standards NQA-1 and NQA-2 (References 43 and 44, respectively). Either approach is acceptable. The NRC Staff is developing new staff positions related to graded quality assurance and upon issuance of those positions, these sections will be considered for further revision.¹⁰ ~~The secondary review branches review the listing of structures, systems, and components (QA list) covered by the QA program for their areas of review responsibility in accordance with 2A1 of this section of the Standard Review Plan and documents the acceptability of the listing including any items that should be added or clarified by memo to the QAB. The review by MEB in this regard also addresses the areas of review responsibility normally assigned to ASB, RSB, CEB, PSB (except electrical), and SEB.~~¹¹

The review extends to the determination of how the applicable requirements of the 18 criteria of Appendix B to 10 CFR Part 50 are satisfied by the proposed QA program.

Where an NRC-accepted QA topical report is referenced in the application, the referenced QA program (QAP)¹² is not re-reviewed except for conformance to the applicable staff positions in this Standard Review Plan (SRP)¹³ section and the regulatory guides in effect at the time of docketing the application.

The review will not involve an evaluation of the QA program for the design and construction phase and, therefore, the QAP description for design and construction should not be addressed in the FSAR except for a commitment for continued implementation of the preliminary safety analysis report (PSAR)¹⁴ QA program for the remaining design and construction activities and the preoperational test program or referenced as applicable for repair and modifications only during the operations phase. However, as desired, changes to the QA program for design and construction may be presented in the FSAR for staff review and approval. Staff review will only address the program changes.

The areas of review for this SRP section are the same as those described in SRP Section 17.1, except:

1. Organization (item 1) delete from part A: "including the applicant's organization and principal contractors (architect engineer, nuclear steam supply system vendor, constructor, and construction manager when other than the constructor)."
2. Audits (item 18) add a part C: "Provisions for the audit of operating activities important to safety independent of the operating organization."

Review Interfaces¹⁵

The HQMB reviews reliability assurance programs under SRP Section 17.4 (proposed).¹⁶

* References are listed in subsection VI of SRP Section 17.1.

The HQMB coordinates other branch evaluations that interface with the overall review, as follows:

1. The secondary review branches review the listing of structures, systems, and components (QA list) covered by the QA program for their areas of review responsibility in accordance with 2A1 of this section of the Standard Review Plan and documents the acceptability of the listing, including any items that should be added or clarified by memo to the HQMB. The review by EMEB in this regard also addresses the areas of review responsibility normally assigned to Plant Systems Branch (SPLB), Reactor Systems Branch (SRXB), Materials and Chemical Engineering Branch (EMCB), HICB,¹⁷ and ECGB.¹⁸
2. The EMCB performs the detailed review of the adequacy of programs for assuring the integrity of bolting and threaded fasteners as part of its primary review responsibility for SRP Section 3.13 (proposed).¹⁹

II. ACCEPTANCE CRITERIA

- A.²⁰ 10 CFR Part 21 requires firms constructing, owning, operating or supplying components to have procedures for evaluating and reporting defects or noncompliances.²¹
- B. 10 CFR Part 50, §50.55a requires that structures, systems and components (SSC) be designed, fabricated, erected, constructed, tested and inspected to quality standards commensurate with the importance of the safety function to be performed.²²
- C. Appendix A of 10 CFR Part 50, General Design Criterion (GDC) 1, "Quality Standards and Records," requires that SSC important to safety be designed, fabricated, erected and tested to quality standards commensurate with the importance of the safety functions to be performed.²³
- D. Appendix B of 10 CFR Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," specifies 18 quality criteria which must be addressed in a QA program.²⁴

The applicant must establish a QA program for the operations phase, including activities such as operation, maintenance, and modification of the nuclear power plant, in accordance with Appendix B to 10 CFR Part 50, "~~Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants.~~"²⁵ The QA program description presented in the FSAR must discuss how each criterion of Appendix B will be met. The ~~acceptance~~specific criteria²⁶ used by the ~~QAB~~ HQMB²⁷ to evaluate the program are listed below. These ~~acceptance~~criteria²⁸ include an expectation of an applicant's²⁹ commitments to comply with the regulatory positions presented in the appropriate issue of the regulatory guides, including the requirements of ANSI Standard N45.2.12-1977³⁰ and the branch technical positions, regulations and Generic Letters³¹ listed discussed in subsection VII.2A1³² of SRP Section 17.1. ~~Thus, these~~Such³³ commitments constitute an integral part of the QA program description and requirements. Exceptions and alternatives to these ~~acceptance~~specific³⁴ criteria may be taken by applicants provided adequate justification is given, and,³⁵ the ~~QAB~~HQMB³⁶ review allows for considerable flexibility in

defining methods and controls for satisfying pertinent regulations. When the QA program description meets the acceptance-specific³⁷ criteria of this SRP section or provides acceptable exceptions or alternatives, the program is considered to be in compliance with pertinent NRC regulations. The review will ascertain that the commitments and the description of how the commitments are implemented, to the extent necessary, are objective and stated in inspectable terms.

The Organization (SARP³⁸ Section 17.2.1) elements responsible for the QA program are acceptable if:

1. The criteria described in 17.1.1^{**} are satisfied except for:
 - a. Item 1A4 would not apply.³⁹
 - b. The organizational elements within the parenthesis in item 1A5 should⁴⁰ be expanded to include operations and maintenance.
 - c. The requirements that principal contractors describe QA responsibilities should⁴¹ be deleted in Item 1A6.
 - d. The requirements that a QA position be identified for principal contractors, as described in Item 1B1, should⁴² be deleted.
 - e. "The person at the construction site responsible for directing and managing the site QA program..." described in Item 1C3, should⁴³ be changed to "The person...responsible for...the onsite QA program," and continue on with remaining sentence, starting with "has appropriate organizational..."

The Quality Assurance Program (SARP Section 17.2.2) description is acceptable if:

1. The criteria described in 17.1.2 are satisfied, except for:
 - a. Item 2A1b would not apply.⁴⁴
 - b. Item 2B2 and 2B4, in which the reference to §50.55(f) should be changed to §50.54(a).⁴⁵
 - c. Item 2B3, in which reference to §50.34(a)(7) should be changed to §50.34(b)(6)(ii).⁴⁶
 - d. Items 2B3 and 2B4, in which the references to §50.55(e) do not apply.⁴⁷

^{**} Refers to the acceptance criteria given in subsection II of SRP Section 17.1.

- b.e. The requirement for the principal contractors to provide a commitment to comply with the regulations and regulatory positions in the regulatory guides addressed in Item 2B3 would not apply.⁴⁸
 - c.f. Item 2C2 would not apply.⁴⁹
 - d.g. Item 2C3 would not apply.⁵⁰
2. Provisions are established for ~~assuring~~ ensuring⁵¹ the QA program for operations is implemented at least 90 days prior to fuel loading.
 3. Confirmation is provided to commit to continued implementation of the PSAR QA program for the remaining design and construction activities and the preoperational test program or an acceptable alternative is provided.
 4. Confirmation is provided to commit to training and qualification of nuclear power plant personnel, pursuant to the requirements of 10 CFR 50.120.⁵²

Activities related to Design Control (SARP Section 17.2.3) are acceptable if:

1. The criteria described in 17.1.3 are satisfied.
2. Measures are provided to ~~assure~~ ensure that responsible plant personnel are made aware of design changes/modifications which may affect the performance of their duties.

Activities related to Procurement Document Control (17.2.4) are acceptable if:

1. The criteria described in 17.1.4 are satisfied.

Activities related to Instructions, Procedures, and Drawings (17.2.5) are acceptable if:

1. The criteria described in 17.1.5 are satisfied.

Activities related to Document Control (17.2.6) are acceptable if:

1. The criteria described in 17.1.6 are satisfied.
2. Maintenance, modification, and inspection procedures are reviewed by qualified personnel knowledgeable in QA disciplines (normally the QA organization) to determine:
 - a. The need for inspection, identification of inspection personnel, and documentation of inspection results.
 - b. That the necessary inspection requirements, methods, and acceptance criteria have been identified.

Activities related to Control of Purchased Material, Equipment, and Services (17.2.7) are acceptable if:

1. The criteria described in 17.1.7 are satisfied.

Activities related to Identification and Control of Materials, Parts, and Components (17.2.8) are acceptable if:

1. The criteria described in 17.1.8 are satisfied.

Activities related to the Control of Special Processes (17.2.9) are acceptable if:

1. The criteria described in 17.1.9 are satisfied.

Activities related to Inspection (17.2.10) are acceptable if:

1. The criteria described in 17.1.10 are satisfied.
2. When inspections associated with normal operations of the plant (such as routine maintenance, surveillance, and tests) are performed by individuals other than those who performed or directly supervised the work, but are within the same group, the following controls are met:
 - a. The quality of the work can be demonstrated through a functional test when the activity involves breaching a pressure retaining item.
 - b. The qualification criteria for inspection personnel are reviewed and found acceptable by the QA organization prior to initiating the inspection.

Activities related to Test Control (17.2.11) are acceptable if:

1. The criteria described in 17.1.11 are satisfied.

Activities related to Control of Measuring and Test Equipment (17.2.12) are acceptable if:

1. The criteria described in 17.1.12 are satisfied.

Activities related to Handling, Storage, and Shipping (17.2.13) are acceptable if:

1. The criteria described in 17.1.13 are satisfied.
2. Provisions are described for the storage of chemicals, reagents (including control of shelf life), lubricants, and other consumable materials.

Activities related to Inspection, Test, and Operating Status (17.2.14) are acceptable if:

1. The criteria described in 17.1.14 are satisfied.

Activities related to Nonconforming Materials, Parts, or Components (17.2.15) are acceptable if:

1. The criteria described in 17.1.15 are satisfied.

Activities related to Corrective Action (17.2.16) are acceptable if:

1. The criteria described in 17.1.16 are satisfied.

Activities related to Quality Assurance Records (17.2.17) are acceptable if:

1. The criteria described in 17.1.17 are satisfied.
2. QA records include operating logs, maintenance and modification procedures, and related inspection results; reportable occurrences; and other records required by Technical Specifications.

Activities related to Audits (17.2.18) are acceptable if:

1. The criteria described in 17.1.18 are satisfied.
2. Where the "onsite" QA organization does not report to the "offsite" organization:
 - a. The "offsite" QA organization conducts audits sufficient to verify adequacy of activities conducted by the "onsite" QA organization.
 - b. The "offsite" QA organization reviews and concurs in the schedule and scope of audits performed by the "onsite" QA organization.
 - c. Results of audits performed by the "onsite" QA organization are provided to the "offsite" QA organization for review and assessment.

Technical Rationale⁵³

The technical rationale for application of these acceptance criteria to quality assurance during operation is discussed in the following paragraphs:

1. Compliance with 10 CFR 50.55a and GDC 1 requires that SSC important to safety be designed, fabricated, erected, tested and inspected to quality standards commensurate with the importance of the safety function to be performed.

GDC 1 and 10 CFR 50.55a are applicable to this section because they mandate application of requirements normally contained within a quality assurance program. SRP

Section 17.2 describes the staff's position regarding the content and review of an applicant's required QA program.

Meeting the requirements of 10 CFR 50.55a and GDC 1 provides assurance that structures, systems, and components important to safety will be designed, fabricated, constructed, and tested in a manner that will facilitate their intended safety function.

2. Compliance with 10 CFR Part 50, Appendix B, pursuant to §50.34, requires that every applicant for a construction permit or an operating license include in its SAR a description of the QA program to be used for the design, fabrication, construction, testing and operation of the facility's structures, systems, and components.

10 CFR Part 50, Appendix B, is applicable to this section because it specifies the criteria for establishing a QA program for the design, construction and operation of a nuclear power plant. SRP Section 17.2 provides guidance related to staff review and approval of the required QA program. Regulatory Guide 1.33 describes a method acceptable to the NRC staff for establishing and implementing such a program.

Meeting the requirements of 10 CFR Part 50, Appendix B, provides assurance that nuclear power plants will be designed, fabricated, constructed, tested and operated in a manner that would not cause undue risk to the health and safety of the public.

3. Compliance with 10 CFR Part 21 requires reporting of defects or failures to comply that are determined to be substantial safety hazards. Part 21 specifies what constitutes substantial safety hazards and the format and schedule for such reporting.

10 CFR Part 21 is applicable to this section because reportable defects or noncompliances should be identified, evaluated and reported under the QA Program.

Meeting the requirements of 10 CFR Part 21 provides assurance that substantial safety hazards are: 1) evaluated; 2) subject to proper corrective action; and 3) identified to the Commission so they can evaluate the adequacy of corrective actions and consider any generic implications.

III. REVIEW PROCEDURES

Same as SRP Section 17.1, except that the ~~Office of Inspection & Enforcement (I&E)~~ Office of Nuclear Reactor Regulation (NRR)⁵⁴ does not provide a position statement to ~~QAB HQMB~~⁵⁵ relative to their assessment of the QA program implementation for safety evaluation report (SER)⁵⁶ input. ~~I&E~~ NRR⁵⁷ provides this assessment to the Licensing Project Manager. ~~QAB HQMB~~⁵⁸ reviews a description of the ~~I&E~~ NRR⁵⁹ summary of completed QA program activities to further determine that the facility has been designed and constructed in accordance with PSAR program commitments.

IV. EVALUATION FINDINGS

Same as SRP Section 17.1, except for listing of 10 CFR 50.55(e).⁶⁰

V. IMPLEMENTATION

Same as SRP Section 17.1.

VI. REFERENCES

Same as SRP Section 17.1, except:

- a. Replace item 812⁶¹ Regulatory Guide 1.28, "Quality Assurance Program Requirements (Design and Construction)" (~~endorses N45.2~~)⁶² with Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)" (endorses ANSI N18.7/ANS-3.2)⁶³; ~~replace 10 CFR Part 50, §50.34(a.7) with 10 CFR Part 50, §50.34 (b.6ii), "Final Safety Analysis Report"; and~~⁶⁴
- b. ~~Delete 10 CFR Part 50, §50.55(e), "Conditions of Construction Permits;,"~~
- c. Add 10 CFR Part 50, §50.120, "Training and Qualification of Nuclear Power Plant Personnel;"⁶⁵
- d. Replace 10 CFR Part 50, §50.55(f) with 10 CFR Part 50, §50.54(a);⁶⁶
- e. Add Regulatory Guide 4.15, "Quality Assurance for Radiological Monitoring Programs (Normal Operations)--Effluent Streams and the Environment;"⁶⁷
- f. Add Regulatory Guide 7.10, "Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material."⁶⁸

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SRP Draft Section 17.2
Attachment A - Proposed Changes in Order of Occurrence

Item numbers in the following table correspond to superscript numbers in the redline/strikeout copy of the draft SRP section.

Item	Source	Description
1.	Current PRB name and abbreviation	Changed PRB to Quality Assurance and Maintenance Branch (HQMB).
2.	Current SRB abbreviation	Changed SRB to EMEB.
3.	Current SRB abbreviation	Changed SRB to HICB.
4.	Current SRB abbreviation	Changed SRB to EELB.
5.	Current SRB abbreviation	Changed SRBs to PERB.
6.	Current SRB abbreviation	Changed SRB to ECGB.
7.	Current SRB abbreviation	Changed SRB to SCSB.
8.	Current PRB abbreviation	Changed PRB to HQMB.
9.	Editorial modification	Defined "FSAR" as "final safety analysis report."
10.	Editorial, PRB Comments	Added explanation of the difference between SRP Sections 17.1/17.2 and SRP Section 17.3. This reflects comments from HQMB that NQA-1/2 or ANSI N45.2 are acceptable approaches and that they still use 17.1 and 17.2 to review programs based upon N45.2. Also added discussion of ongoing efforts by the Staff to address graded QA.
11.	SRP-UDP format item	Relocated the secondary review to a new section, "Review Interfaces."
12.	Editorial modification	Provided "QAP" as an initialism for "quality assurance program."
13.	Editorial modification	Defined "SRP" as "Standard Review Plan."
14.	Editorial modification	Defined "PSAR" as "preliminary safety analysis report."
15.	SRP-UDP format item	Added "Review Interfaces" to AREAS OF REVIEW concerning how HQMB coordinates reviews conducted by other branches and how other branches support this review.
16.	Potential Impact 23067	Added a review interface reflecting review of reliability assurance programs.
17.	Editorial	Specified HICB rather than EELB based upon original text specifying "(except electrical)."
18.	Editorial; PRB names and abbreviations.	Relocated text from first paragraph, substituting current review branch names and designations.
19.	SRP-UDP Integration of Bolting Issues, Potential Impact 19841	Added a review interface reflecting reviews of bolting and threaded fastener programs under new SRP Section 3.13.

SRP Draft Section 17.2
Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
20.	Editorial	Separated general Acceptance Criteria into separate paragraphs and added alphabetical designation to facilitate referencing these criteria.
21.	Integrated Impacts 932 and 1065	Added 10 CFR Part 21 as Acceptance Criteria.
22.	Editorial	Identified 10 CFR 50.55a as an acceptance criterion (previously identified only by general reference to the reference listing). Also defined acronym SSC for structures, systems and components, consistent with usage in other SRP sections.
23.	Editorial	Listed GDC 1 as an Acceptance Criterion, previously only included in general references to criteria and references in SRP 17.1.
24.	Editorial	Provided characterization of 10 CFR 50 Appendix B.
25.	Editorial	Struck title of Appendix B since it is listed above.
26.	Editorial	Changed "acceptance criteria" to "specific criteria" to provide a distinction between requirements (e.g., regulations) and regulatory guidance.
27.	Current PRB abbreviation	Changed PRB to HQMB.
28.	Editorial	Changed "the acceptance criteria" to "these criteria" to make a distinction between acceptance criteria (requirements) and specific criteria (review or regulatory guidance).
29.	Editorial	Added text to clarify that the commitment is on the part of the applicant, not the SRP section.
30.	Integrated Impact No. 688	Added version information for ANSI N45.2.12.
31.	SRP-UDP format item	Added "regulations and Generic Letters" to reflect the inclusion of regulations and the addition of GLs to the acceptance criteria commitments in SRP 17.1, subsection II and to SRP 17.1, subsection VI as references.
32.	Editorial	Revised the referenced location of additional regulatory guidance to allow expanded discussion of applicable documents. (Note: original reference to subsection V was in error and should have been subsection VI.)
33.	Editorial	Revised text for increased clarity.
34.	Editorial	Changed "acceptance criteria" to "specific criteria" to make a distinction between requirements and regulatory guidance.

SRP Draft Section 17.2
Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
35.	Editorial	Corrected the punctuation and removed conjunction to make the text consistent with corresponding text in SRP 17.1.
36.	Current PRB abbreviation	Changed PRB to HQMB.
37.	Editorial	Changed "acceptance criteria" to "specific criteria" to make a distinction between requirements and regulatory guidance.
38.	Editorial	Corrected "SRP Section" to "SAR Section" since the SRP review is determining the acceptability of the description in the SAR, not the SRP. (Similar changes throughout the balance of this section.)
39.	Editorial	Added "would not apply" to clarify the sentence.
40.	Editorial	Added "should" to make the sentence read more clearly.
41.	Editorial	Added "should" to make the sentence read more clearly.
42.	Editorial	Added "should" to make the sentence read more clearly.
43.	Editorial	Added "should" to make the sentence read more clearly.
44.	Editorial	Added "would not apply" to clarify the sentence.
45.	Integrated Impact No. 931	Added subsection II.17.2.2.1.b, and replaced reference to §50.55(f) with reference to §50.54(a).
46.	Editorial	Noted substitution of FSAR content requirements for PSAR content requirements.
47.	Editorial	Added subsection II.17.2.2.1.c, and noted that references to §50.55(e) do not apply. Subsequent items renumbered.
48.	Editorial	Added "would not apply" to clarify the sentence.
49.	Editorial	Added "would not apply" to clarify the sentence.
50.	Editorial	Added "would not apply" to clarify the sentence.
51.	Editorial modification	Changed "assure" to "ensure" (global change for this section).
52.	Integrated Impact No. 934	Added provisions reflecting training and qualification of nuclear power plant personnel, pursuant to 10 CFR 50.120, as subsection 17.2.2.4.

SRP Draft Section 17.2
Attachment A - Proposed Changes in Order of Occurrence

Item	Source	Description
53.	SRP-UDP format item, develop technical rationale	Added "Technical Rationale" to ACCEPTANCE CRITERIA and formatted in numbered paragraphs describing the bases for referencing the General Design Criteria.
54.	Editorial modification	I&E was absorbed into the Office of Nuclear Reactor Regulation (NRR).
55.	Current PRB abbreviation	Changed PRB to HQMB.
56.	Editorial modification	Defined "SER" as "safety evaluation report."
57.	Editorial modification	I&E was absorbed into NRR.
58.	Current PRB abbreviation	Changed PRB to HQMB.
59.	Editorial modification	I&E was absorbed into NRR.
60.	Editorial	Noted that the findings of SRP 17.1 related to 10 CFR 50.55(e) are not appropriate for an operational QA program finding.
61.	Editorial modification	For clarity, broke items out in separate paragraphs and revised item numbers to parallel revisions to SRP Section 17.1, REFERENCES.
62.	Editorial	Removed parenthetical regarding standard endorsed by RG 1.28, as it is outdated and unnecessary.
63.	Reference Verification	Provided a more complete citation of standard endorsed by RG 1.33.
64.	Editorial	Deleted discussion of 50.34 (a.7) since the SRP 17.1 reference has been revised to more generally list 50.34.
65.	Integrated Impact No. 934	Referenced 10 CFR 50.120 in subsection VI.
66.	Integrated Impact No. 931	Changed reference from § 50.55(f) to § 50.54(a) in subsection VI to parallel the same change in subsection 17.2.2.1.b.
67.	Integrated Impact No. 1547	Added RG 4.15 as applicable guidance for QA for radiological monitoring programs.
68.	Integrated Impact No. 1547	Added RG 7.10 as applicable guidance for QA programs for radioactive material packaging.

SRP Draft Section 17.2
Attachment B - Cross Reference of Integrated Impacts

Integrated Impact No.	Issue	SRP Subsections Affected
688	Specify the 1977 version of ANSI N45.2.12 and consider citing ASME NQA-1.	Acceptance Criteria, II
931	Add acceptance criteria to address change from 10 CFR 50.55(f) to 10 CFR 50.54(a) to reflect the difference between SRP Sections 17.1 and 17.2.	Acceptance Criteria, II.17.2.2.1 References, VI.d
932	Replace § 50.55(e) with 10 CFR Part 21 to reflect the difference between SRP Sections 17.1 and 17.2.	Acceptance Criteria, II.A
934	Add item 5 requiring a commitment to § 50.120 in subsection 17.2.2.	Acceptance Criteria, II.17.2.2.4 References, VI.c
1060	Modify Acceptance Criteria to include identification of the requirements of 50.34(f)(3)(iii).	No changes based upon implementation of Integrated Impact 1083 in SRP 17.1.
1065	Perform additional analysis regarding amendments to 10 CFR 21 and 10 CFR 50.55(e).	Acceptance Criteria, II.A.
1547	Add Regulatory Guides 4.15 and 7.10 to the references list as guidance applicable to QA commitments, consistent with applicable cited Regulatory Guides in SRP 17.3.	References, VI.e and VI.f