

CHAPTER 11

QUALITY ASSURANCE

11.0 QUALITY ASSURANCE

The activities associated with the Independent Spent Fuel Storage Installation (ISFSI) are performed under the guidance of applicable portions of the CP&L Quality Assurance (QA) Program delineated in Reference 11.1. Controls are established for the applicable activities which CP&L performs as well as for those appropriate activities which subcontractors perform.

Nuclear Oversight personnel perform oversight to assure that appropriate quality requirements are being met in the normal implementation of technical programs. Work associated with this project will be performed in the same way as other nuclear plant related activities, and will, therefore, be covered by the normal assessment process.

11.1 QUALITY ASSURANCE

It is the policy of CP&L to design, construct, and operate nuclear power plants without jeopardy to its employees or to the public health and safety. The QA programs shall be developed, implemented, and updated as necessary to assure that the Company's nuclear facilities will be managed such that all systems used to produce, convey, or use nuclear generated steam and all systems used to treat, store, or convey waste produced by the generation of nuclear steam will be designed, constructed, and operated in a safe manner. Deviations from this program shall be permitted only upon written authority from the corporate management position originally approving the program or implementing procedures.

The design, construction, and operation of nuclear facilities shall be accomplished in accordance with the U. S. Nuclear Regulatory Commission (NRC) Regulations specified in Title 10 of the U.S. Code of Federal Regulations. All commitments to the NRC Regulatory Guides and to engineering and construction codes shall be carried out.

The operation of the Company's ISFSI shall be in accordance with the terms and conditions of the ISFSI material license issued by the NRC (10 CFR Part 72). Changes in operating procedures, experiments at the ISFSI, modifications to the ISFSI hardware or systems, shall be made in accordance with the terms and conditions of the ISFSI material license.

The Dry Storage Canister and Transfer Cask are considered safety-related and are subject to a QA program in conformance with the requirements of 10 CFR 50, Appendix B and the QA Program described in Reference 11.1.

This QA program will be applied to those structures, systems, and components of the Horizontal Storage Module (HSM) and foundation that are important to safety. The program will apply for the continued inspection, testing, operation, maintenance, repair, and modification of these HSM structures, systems, and components which are important to safety.

A Radwaste QA Program was applied to the HSM and foundation during the procurement, construction, and testing phases of the project. After these phases were completed and the initial loading of the Dry Shielded Canisters (DSCs) was completed, the HBR ISFSI deemed "operational." Keeping in mind that the NUHOMS system being utilized for the HBR ISFSI is a totally passive installation, there are no pieces of equipment which require operation nor a requirement for data collection and reporting.

However, as stated in Section 5.1.1.7 of this document, a daily visual inspection of air inlets and outlets will be made to insure that they remain unblocked and the integrity of the screens remains intact. In addition, it is stated in Section 7.3.4 of this document that "The operation of the ISFSI will be monitored under the HBR Unit 2 Radioactivity Monitoring Program. No additional radiation monitoring instrumentation is required." Operation of the HBR ISFSI will be as established by the requirements of the Technical Specifications contained in the Safety Analysis Report and will be carried out in accordance with the QA program.

Assessments will be performed by Nuclear Oversight at least every two years. Assessments and other management oversight activities shall be performed in accordance with the QA Program for safety-related activities.

11.2 H. B. ROBINSON QUALITY ASSURANCE PROGRAM

The HBR QA Program is controlled by the policies and requirements of the QA Program. These policies and requirements are implemented through the Plant Operating Manual and other approved procedures. The program is designed to ensure compliance with the applicable NRC Regulatory Guides and ANSI Standards.

Details of the HBR QA program are contained in Reference 11.1.

11.3 NUTECH QUALITY ASSURANCE

The HBR ISFSI is designed by NUTECH Engineers, Inc. The quality assurance followed by NUTECH is described in Reference 11.2 and has been approved by CP&L Quality Assurance.

REFERENCES: CHAPTER 11

- 11.1 Carolina Power & Light Company, "H. B. Robinson Steam Electric Plant Unit No. 2 Updated Final Safety Analysis Report," Docket No. 50-261, License No. DPR-23.
- 11.2 NUTECH Engineers, Inc., "Topical Report for the NUTECH Horizontal Modular Storage System for Irradiated Nuclear Fuel," NUH-001, Revision 1, November 1985.