



October 13, 2014

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTN: Document Control Desk

Subject: Bechtel Quality Assurance Program for Nuclear Power Plants Topical Report, BQ-TOP-1, Revision 2

Reference: 1) NRC Letter from Ho K. Nieh (U.S. NRC) to J. E. Reinsch (Bechtel), Final Safety Evaluation for Bechtel Topical Report (TR), BQ-TOP-1, 2007 Revision, "Quality Assurance Program for Nuclear Power Plants" (TAC NO. MD5365), dated January 22, 2008.

2) Bechtel letter from J. E. Reinsch (Bechtel) to Document Control Desk (U.S. NRC), "Bechtel Quality Assurance Program for Nuclear Power Plants," Topical Report, BQ-TOP-1, 2007 Edition, Rev. 1A (TAC NO. MD5365) NRC Project # 1365, dated April 3, 2008

3) Bechtel letter from V. Chrijapin (Bechtel) to Document Control Desk (U.S. NRC), "Bechtel Quality Assurance Program for Nuclear Power Plants Topical Report, BQ-TOP-1, Revision 2" dated March 4, 2014.

4) Letter from Joseph J. Holonich (U.S. NRC) to Rajwant S. Jolly (Bechtel), "Request for Additional Information Related to Bechtel Quality Assurance Program for Nuclear Power Plants Topical Report, BQ-TOP-1, Revision 2" dated August 18, 2014.

Bechtel Topical Report (BQ-TOP-1) Revision 2 was submitted to the NRC via letter dated March 4, 2014 (Reference 3). The NRC subsequently submitted a Request for Additional Information on August 18, 2014 (Reference 4) regarding Section 2.6 of BQ-TOP-1 Revision 2, and a clarification as to how positions identified within Section 2.6 maintained "sufficient independence from cost and schedule when opposed to safety considerations" in accordance with Criterion I, "Organization" of Appendix B to Title 10 of the Code of Federal Regulations (10 CFR) Part 50.

Enclosure 1 to this letter contains the Bechtel response to the Request for Additional Information received on letter dated August 18, 2014 (Reference 4).

If you have any questions or further requests for additional information, please contact me at (301) 228-6788.

Respectfully,

Rajwant Jolly
Manager of Quality Assurance

RSJ/jag

Q015

Enclosures:

1. Bechtel Response to NRC Request for Additional Information regarding the Bechtel Topical Report (BQ-TOP-1), Revision 2.

cc: Joseph Holonich, NRC, Senior Project Manager, NRR

Enclosure 1: Bechtel Response to NRC Request for Additional Information

Criterion I, "Organization" of Appendix B to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50 states in part that, "The persons and organizations performing quality assurance functions shall have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions. The persons and organizations performing quality assurance functions shall report to a management level so that the required authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations, are provided."

- Section 2.6 of the Bechtel Quality Assurance Program assigns final authority on quality program matters to the Manager of Quality Assurance, Manager of Quality & Six Sigma, Executive Unit Manager, or the President Nuclear business line. From the position descriptions (Sections 1.2 and 1.4.5) and organizational chart (Figure 2) it appears that the Manager of Quality & Six Sigma and the Executive Unit Manager are responsible for production activities. Clarify how these individuals maintain, "sufficient independence from cost and schedule when opposed to safety considerations."

Bechtel Response:

As identified in Section 1.4.5, the Manager of Quality & Six Sigma is responsible for the Quality Assurance function within the Bechtel Quality Assurance Program. Figure 2 in the Topical Report (TOP) denotes that the Manager of Quality & Six Sigma reports to the Execution Unit Manager. As the Manager of Quality & Six Sigma is not responsible for aspects of the program related to design, procurement, construction, or contracts, this position is independent of cost and schedule factors when they are opposed to safety considerations.

The discussion found in Section 2.6 TOP is identifying the personnel that are responsible for the resolution of disputes.

A dispute between the Manager of Quality Assurance and another manager reporting to the President Nuclear business line, the President Nuclear business line is the final authority.

When the dispute is between the Manager of Quality & Six Sigma and another manager reporting to the Execution Unit Manager, the final authority is the Execution Unit Manager.

If the dispute is between the Execution Unit Manager and another Manager the final authority is the President Nuclear business line who is responsible for the adequacy and overall effectiveness of the quality assurance program as denoted in Section 1.2.

The final authority for these disputes is as applicable to the source of the dispute and the corresponding reporting structure as outlined in Figure 2. Section 2.6 is not intended to reflect that either the Execution Unit Manager or the President Nuclear business line are independent of cost and schedule. However, both of these positions are identified in Section 1.2 denoting their respective responsibilities in regards to the quality assurance program.

The President Nuclear business line is responsible for the adequacy and overall effectiveness of the quality assurance program. The Execution Unit Manager is responsible for the effective implementation of the quality assurance program.

As a point of clarification, the content and intent of Section 2.6 of the TOP have not been revised. The revision applicable to Section 2.6 was in relation to job titles.