



HITACHI

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MFN 16-029

Docket Number: 72-1

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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Director, Division of Spent Fuel Management
Office of Nuclear Material Safety and Safeguards
Washington, DC 20555-0001

Subject: Change Evaluation for Revision 3 of the GE Hitachi Nuclear Energy, Morris Operation, Topical Report NEDE-31559, "GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation"

Reference:

1. Letter from Jerald G. Head (GEH) to NRC Document Control Desk, Subject: Revised Version of the GE Hitachi Nuclear Energy, Morris Operation, Topical Report NEDE-31559, Entitled "GE Hitachi Nuclear Energy Quality Assurance Plan – Morris Operation," Revision 3, MFN 15-085, October 9, 2015.

On October 9, 2015 GE Hitachi Nuclear Energy (GEH) submitted Revision 3 of the Morris Operation Quality Assurance Plan (Reference 1).

In an April 1, 2016 teleconference with the NRC, the NRC requested that GEH provide the NRC with a change evaluation documenting the changes made to Revision 3 of the Morris Operation Quality Assurance Plan to allow the NRC to determine if there were any reductions in commitments.

In addition, the NRC requested a corresponding list of changes to be made to the Morris Operation Technical Specifications. GEH has determined that there are no changes planned for the Morris Technical Specifications as the result of the revision to the Morris Operation Quality Assurance Plan, NEDE-31559 Revision 3.

This letter transmits the requested change evaluation as Enclosure 1 to this letter. The change evaluation reflects the activities that are ongoing at the Morris Operation. The basis for the Quality Assurance Plan remains 10 CFR Part 72. Extra elements that were not required to meet 10 CFR 72 were removed from the Morris Operation Quality Assurance Plan (i.e., 10 CFR 71 and ANSI N45.2).

Please note that the change evaluation indicates that in Section 8.4.1 of NEDE-31559 Revision 3, the text in the last sentence was changed from "Section 10.0" to "Section 7.0"; however, GEH has observed that this change was not made in Revision 3 of NEDE-31559; this change will be made as part of the creation of the accepted (-A) version of NEDE-31559 Revision 4.

If you have any questions regarding this letter, please contact Rich Augi at 910-819-6366.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerald G. Head". The signature is fluid and cursive, with the first name "Jerald" being more prominent than the last name "Head".

Jerald G. Head
Senior Vice President Regulatory Affairs

Commitments: No additional commitments are made in this response.

Enclosure:

1. Change Evaluation for Revision 3 of "GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation," NEDE-31559 – Non-Proprietary Information – Class I (Public)

cc: Mark Lombard, NRC NMSS
Marlone Davis, NRC
Anthony McFadden, GEH
Franklin Partney, GEH
Emily Martin, GEH
Peter Yandow, GEH
Tammy Orr, GEH
Mark Elliot, GEH
PLM Specification 003N1259 R1

Enclosure 1

MFN 16-029

**Change Evaluation for Revision 3 of “GE Hitachi Nuclear Energy
Quality Assurance Plan Morris Operation,” NEDE-31559**

Non-Proprietary Information – Class I (Public)

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
		Cover Page	Added, includes signatories.
	Legal Notice	Disclaimer	Changed to "Disclaimer".
	Statement of Policy and Authority	Policy Statement	Deleted 10CFR72 and reference to ISFSI and MO License SNM 2500-1. Replaced 10CFR72, Subpart G, "Quality Assurance" and 10CFR71, Subpart H, "Quality Assurance" with "...the requirements of the Code of Federal Regulations (CFR), the applicable Nuclear Regulatory Commission (NRC) Facility Operating Licenses...".
		Revision History	Added Revision History table.
	Table Of Contents	Table of Contents	Relocated TOC in the document and moved signatories to Cover Page. Deleted revision and date for each individual section, document will be revised in total in the future.
		Acronyms	Added section for acronyms.
	Introduction		Deleted introduction section.
SECTION 1	ORGANIZATION		
1.1	Purpose	Purpose	Deleted GE Vallecitos Operation. Added second sentence to describe personnel assigned quality related responsibilities.
1.2	Delegation and Performance of Duties	Delegation and Performance of Duties	No change.
1.3	General	General	Split 1.3.1 into 1.3.1 & 1.3.2. 1.3.3: Added for reporting responsibilities. 1.3.2: Became 1.3.4. 1.3.3: Became 1.3.5.

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
1.4	Organization and Responsibilities	Organization and Responsibilities	<p><u>From Revision 2 to Revision 3:</u></p> <p>1.4.2: Eliminated previous position “Regulatory Compliance Manager”, moved responsibilities to the “Manager, MO”.</p> <p>1.4.3: Changed “Operations Engineering & Projects Manager” to “Operations and Maintenance Coordinator”.</p> <p>1.4.4: Eliminated “Operations Engineer”, moved responsibilities to “Operations and Maintenance Coordinator”.</p> <p>1.4.5: Eliminated “Radiation Safety Specialist”, moved responsibilities to the “Manager, MO”.</p> <p>1.4.6: Changed “RCM” to “Quality”.</p> <p><u>Added to Revision 3:</u></p> <p>1.4.2: Added, describes Environmental Health and Safety and Procurement Administrator role.</p> <p>1.4.4: Added, describes Quality role.</p> <p>1.4.5: Added for activities that have been delegated to GEH under QAPD NEDO-11209-A.</p>
Figure 1	Vallecitos and Morris Operation Organization	Morris Operation Organization	Updated Organization Chart, Deleted Vallecitos.
SECTION 2	QUALITY ASSURANCE PROGRAM		
2.1	Purpose	Purpose	No change.

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
2.2	General	General	<p><u>From Revision 2 to Revision 3:</u></p> <p>2.2.1: Added 10 CFR Part 21; Deleted Part 71, ANSI N45.2, GENE Procedures 70-1 and 70-11 and SNT-TC-1A.</p> <p>2.2.2: Deleted as redundant to 2.2.3.</p> <p>2.2.3: Became 2.2.2.</p> <p>2.2.4: Became 2.2.3 specifically stating what structures, systems and components to which the MO Quality Program applies.</p> <p><u>Added to Revision 3:</u></p> <p>2.2.4: The statement previously in 2.4.4 was moved to 2.2.4.</p>
2.3	Responsibilities	Responsibilities	<p><u>From Revision 2 to Revision 3:</u></p> <p>2.3.1: Replaced “Manager, V&MO” with “Manager, Global Supply Chain”.</p> <p>2.3.2: Added clarification for Manager, MO responsibilities.</p> <p>2.3.3: Replaced “Regulatory Compliance Manager” with “GEH Quality”; Enforcement and 1st bullet moved to Manager, MO; 2nd bullet became 2.3.3; 3rd bullet became 2.3.4, responsibility assigned to Quality.</p> <p><u>Added to Revision 3:</u></p> <p>2.3.4: 3rd bullet from previous 2.3.3 moved to create new 2.3.4.</p>
2.4	Program Requirements	Indoctrination and Training	Deleted “Program Requirements” and replaced with “Indoctrination and Training” (see Section 19 for change mapping).
2.5	Application	Plan Control and Revisions	Deleted “Application” information.

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
2.6	Plan Control and Revisions		Moved to Section 2.5, deleted controlled copy process, added electronic maintenance of the QAP and procedures (2.5.1). Added 2.5.2 and 2.5.3 to describe acknowledgement and review of the QAP and subsequent revisions.
2.7	Manual Revision Format		Deleted section, covered under Section 2.5.
SECTION 3	DESIGN CONTROL		
3.1	Purpose	General	Deleted "Purpose".
3.2	General		Moved to Section 3.1. Revised to direct all engineering activities to GEH under NEDO-11209-A. Added 3.1.2 statement for safety related treatment of structures, systems and components described in Section 2.2.3.
3.3	Responsibilities		Deleted.
3.4	Design Control System		Deleted.
Figures 3-1 thru 3-3	Design Control Flow Sheets		Deleted.
SECTION 4	PROCUREMENT DOCUMENT CONTROL		
4.1	Purpose	Purpose	Deleted last sentence referring to Figure 4-1.

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
4.2	General	General	4.2.1: Deleted. Changed Material Request (MR) to Materials and Service Request (MSR), multiple places. 4.2.2: Became 4.2.1. 4.2.3: Became 4.2.2, 7 th bullet modified to reference Section 2.2.3 for classification of structures, systems or components. 4.2.4 and 4.2.6: Combined into 4.2.4. 4.2.5: Became 4.2.3. 4.2.7: Became 4.2.5. 4.2.8: Became 4.2.6, changed “client” to “customer”.
4.3	Responsibilities	Responsibilities	Added 4.3.3 and 4.3.4.
4.4	Implementation		Deleted.
Figure 4-1	Procurement Control		Deleted.
SECTION 5	INSTRUCTIONS, PROCEDURES, AND DRAWINGS		
5.1	Purpose	Purpose	No change.
5.2	Responsibilities	Responsibilities	Note to 5.2.2 deleted.
5.3	Documents Affecting Quality	Documents Affecting Quality	5.3.1: Combined with 1 st bullet. 2 nd bullet became 5.3.2, 3 rd bullet became 5.3.3 and 4 th bullet deleted. 5.3.2: Became 5.3.4.
SECTION 6	DOCUMENT CONTROL		
6.1	Purpose	Purpose	Deleted 2 nd sentence.
6.2	General	General	Revised in its entirety. Added 6.2.1 and 6.2.2.

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
6.3	Responsibilities	Review and Approval of Documents	"Responsibilities" deleted and replaced with new section, "Review and Approval of Documents".
6.4	Document Control System	Changes to Documents	<p><u>From Revision 2 to Revision 3:</u></p> <p>6.4.1: deleted.</p> <p>6.4.2: Moved to 6.4.1 and modified.</p> <p>6.4.3: Combined into 6.4.1.</p> <p>6.4.4: Replaced by 6.3.3.</p> <p>6.4.5: Deleted.</p> <p><u>Added to Revision 3:</u></p> <p>6.4.2 through 6.4.4 to discuss document reviews.</p>
6.5	Control of the Quality Assurance Plan		Deleted.
6.6	Control of Document Revisions		Pertinent information moved to Section 6.4, "Changes to Documents".
6.7	Document Master Lists		Deleted.
6.8	Document Masters		Deleted.
Figure 6-1	Document Control		Removed.
SECTION 7	CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES		Complete rewrite of this section
7.1	Purpose	General	Referenced to NEDO-11209-A for procurement activities.
7.2	General	Receiving Inspection	Added section, partial transfer from 10.4.2.
7.3	Requirements for Survey and Audit of Suppliers		Deleted.

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Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
7.4	MR, RFQ, PO Requirements		Deleted.
7.5	Responsibilities		Deleted.
7.6	Implementation		Deleted.
Figure 7-1	Procurement		Deleted.
SECTION 8	IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS		
8.1	Purpose	Purpose	Deleted last sentence referring to Figure 8-1.
8.2	General	General	Deleted last sentence of 8.2.2.
8.3	Responsibilities	Responsibilities	8.3.1: Deleted. 8.3.2: Became 8.3.1. 8.3.3: Became 8.3.2. 8.3.4 and 8.3.5: Deleted.
8.4	Implementation	Implementation	8.4.1: Last sentence changed from "Section 10.0" to "Section 7.0". 8.4.1: 1 st bullet became 8.4.2, 2 nd bullet deleted. 8.4.2 and 8.4.3: Combined into 8.4.3. 8.4.6: Changed last sentence to reference Section 15.0 if status cannot be determined.
Figure 8-1	Identification and Control of Materials, Parts and Components		Deleted.

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Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
SECTION 9	CONTROL OF SPECIAL PROCESSES		
9.1	Purpose	Purpose	Deleted “Functional Class 1 & 2”. Added last two sentences stating MO does perform any NDE processes.
9.2	Responsibilities	Responsibilities	9.2.1: Changed OE&PM to OMC. 9.2.2: Added GEH Sourcing for vendor/contractors performing NDE.
9.3	Special Process Procedures	Special Process Procedures	9.3.4: Deleted 2 nd and 3 rd sentences that contained example.
9.4	Special Process Personnel	Special Process Personnel	9.4.2: Deleted, SNT-TC-1A is not applicable to 10CFR Part 72. 9.4.3: Became 9.4.2.
9.5	Records	Records	9.5.1: Added “structures, systems and components as described in Section 2.2.3”.
Figure 9-1	Control of Special Processes		Deleted.
SECTION 10	INSPECTION		
10.1	Purpose	Purpose	No change.
10.2	General	General	10.2.5: Removed reference to ANSI N45.2.6. 10.2.6: Deleted. 10.2.7: Became 10.2.6. 10.2.8: Deleted.
10.3	Responsibilities	Responsibilities	10.3.1: Changed OE&PM to OMC. 10.3.2: In 1 st bullet, changed “Functional Classifications” to “as described in Section 2.2.3”. 10.3.2: In 3 rd bullet, changed “2.2” to “Section 2.0”.

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Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
10.4	Implementation	Implementation	10.4.1: Deleted (source inspection covered under NEDO-11209-A. 10.4.2: Moved to 7.2.2 (receiving inspection). 10.4.3: Deleted. 10.4.4: Became 10.4.1. 10.4.5: Deleted (testing is covered in Section 11). 10.4.6: Became 10.4.2. 10.4.7: Deleted. 10.4.8: Became 10.4.3.
SECTION 11	TEST CONTROL		
11.1	Purpose	Purpose	11.1: Deleted “applicable Code”.
11.2	Applicability	Applicability	No change.
11.3	General	General	No change.
11.4	Responsibilities	Responsibilities	11.4.1: Changed “responsible manager or supervisor” to “GEH Engineering”. 11.4.2: Deleted 2 nd bullet.
SECTION 12	CONTROL OF MEASURING AND TEST EQUIPMENT		
12.1	Purpose	Purpose	No change.
12.2	General	General	12.2.2: Converted 2 nd sentence to 12.2.3. 12.2.3: Became 12.2.4.
12.3	Responsibilities	Responsibilities	12.3.1: OE changed to OMC. 12.3.2: Deleted QA, changed “periodic check” to “calibration”. 12.3.4: Removed QA. 12.3.5: Deleted 2 nd bullet.

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Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
12.4	Control System	Control System	12.4.2: Removed “used to control a critical process, or test components, subassemblies or final products”. 12.4.8: Removed last sentence.
SECTION 13	HANDLING, STORAGE, AND SHIPPING		
13.1	Purpose	Purpose	No change.
13.2	Applicability	Applicability	No change.
13.3	General	General	13.3.1: Deleted first bullet and sub-bullets discussing “shipping nuclear materials”. 13.3.2: Changed “for Functional Class 1 & 2 related Applications” to “for structures, systems and components as described in Section 2.2.3”.
13.4	Responsibilities	Responsibilities	13.4.1: Deleted 1 st & 2 nd bullets, combined 3 rd bullet into 13.4.1 13.4.2: Changed “QA” to “Quality”.
13.5	Implementation	Implementation	13.5.4: Deleted and replaced with new 13.5.4 referring to NEDO-11209-A for any 10 CFR Part 71 activities.
SECTION 14	INSPECTION, TEST, AND OPERATING STATUS		
14.1	Purpose	Purpose	14.1.1: Changed “Functional Class 1 & 2 related Applications” to “for structures, systems and components as described in Section 2.2.3”.
14.2	General	General	No change.
14.3	Responsibilities	Responsibilities	14.3.2 and 14.3.3: Deleted.
14.4	Implementation	Implementation	14.4.2: Changed “Functional Class 1 & 2 related Applications” to “Structures, systems and components as described in Section 2.2.3”. 14.4.5: Deleted. 14.4.6: Moved to 14.4.5 and changed QA to Quality.

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
SECTION 15	NONCONFORMING MATERIAL OR COMPONENTS		
15.1	Purpose	Purpose	Deleted “applicable Code”.
15.2	Responsibilities	Responsibilities	15.2.3: Changed “OW, ICS or the OE&PM” to “MO personnel”. 15.2.4: Changed “RCM” to “OMC”.
15.3	Requirements	Requirements	<p><u>From Revision 2 to Revision 3:</u></p> <p>15.3.1 and 15.3.2: Changed “RCM” to “OMC or Manager, MO”. 15.3.3: Minor wording change. 15.3.4: Deleted last part of 1st sentence; added “Meets Specification” as new 1st bullet; in bullets changed “Accept-As-Is” to “Use-As-Is” and modified definitions for “Repair” and “Reject”. 15.3.5: Moved to 15.3.8, changed “RCM” to “Quality”. 15.3.6: Became 15.3.9, Deleted “minimum practical time”; converted 1st bullet to 15.3.10 and modified for Part 21 reporting; 2nd bullet converted to 15.3.11.</p> <p><u>Added to Revision 3:</u></p> <p>15.3.6: Created from “Accept-As-Is” bullet previously in 15.3.4. Also included “Repair”. See 15.4 for other additions to 15.3.</p>
15.4	Material Review Board	Summary of Nonconforming Item Records	15.4.1 and 1 st bullet became 15.3.5; 2 nd bullet became 15.3.7. “Material Review Board” information otherwise replaced by “Summary of Nonconforming Item Records” previously in 15.5.

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
15.5	Summary of Nonconforming Item Records		15.5.1: Became 15.4.1. 15.5.2: Became 15.4.2, but deleted 2 nd sentence.
SECTION 16	CORRECTIVE ACTION PROGRAM		
16.1	Purpose	General	Complete rewrite, referred to NEDO-11209-A for coverage.
16.2	System Description		Deleted.
16.3	Responsibilities		Deleted.
16.4	Implementation		Deleted.
SECTION 17	QUALITY ASSURANCE RECORDS		
17.1	Purpose	Purpose	No change.
17.2	Applicability	Applicability	No change.
17.3	General Requirements	General Requirements	No change.
17.4	Responsibilities	Responsibilities	17.4.2: Deleted.
17.5	Records Handling Procedure	Records Handling Procedure	No change.
SECTION 18	AUDITS		
18.1	Purpose	General	Complete rewrite, referred to NEDO-11209-A for coverage.
18.2	General		See description for 18.1.
SECTION 19	TRAINING		Section was deleted, Indoctrination and Training was moved to Section 2.4
19.1	Purpose		Deleted.
19.2	General		19.2.1: Became 2.4.5, modified. 19.2.2: Deleted.

GE Hitachi Nuclear Energy Quality Assurance Plan Morris Operation NEDE-31559 Revision 3 Mapping to Revision 2

Revision 2 Section	Revision 2 Section Description	Revision 3 Section Description	Summary of Change
19.3	Responsibilities		19.3.1: Became 2.4.1, modified.
19.4	Requirements for Indoctrination		19.4.1: Became 2.4.5, modified. 19.4.2: Became 2.4.6, modified.
19.5	Requirements for Training		19.5.1 1 st sentence became 2.4.1, 2 nd sentence deleted. 19.5.2 1 st , 3 rd and 4 th sentences deleted. 2 nd sentence became 2.4.6, modified. 19.5.3: Became 2.4.7, modified. 19.5.4: Deleted.
19.6	Records		Deleted.
20.0	GLOSSARY OF TERMS AND ABBREVIATIONS		Deleted.