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**Subject:** Request for Additional Information: DOMINION ENERGY KEWAUNEE, DOMINION NUCLEAR CONNECTICUT AND VIRGINIA ELECTRIC POWER COMPANY NUCLEAR FACILITY QUALITY ASSURANCE PROGRAM DESCRIPTION TOPICAL REPORT DOM-QA-1  
**Date:** Thursday, October 13, 2016 11:48:00 AM

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By letter to the U.S. Nuclear Regulatory Commission (NRC) dated July 11, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16196A292), Dominion Energy Kewaunee, Inc., Dominion Nuclear Connecticut, Inc., and Virginia Electric and Power Company, submitted Revision 21 of the Nuclear Facility Quality Assurance Program Description Topical Report DOM-QA-1 for review and approval in accordance with Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.54(a)(4). The proposed changes for Revision 21 of DOM-QA-1 included restructuring the Kewaunee organization consistent with the reduced quality activities in the decommissioning phase, adding exceptions to ANSI N18.1-1971 for the qualifications required for management positions; and replacing the functions of the Kewaunee Independent Review Committee with an Independent Review Group.

### **Request for Additional Information (RAI)**

The requirements of Title 10 of the *Code of Federal Regulations* Part 50, Appendix B Criterion I "Organization," states in part, that, "The authority and duties of persons and organizations performing activities affecting the safety-related functions of structures, systems, and components shall be clearly established and delineated in writing. These activities include both the performing functions of attaining quality objectives and the quality assurance functions. The quality assurance functions are those of (1) assuring that an appropriate quality assurance program is established and effectively executed; and (2) verifying, such as by checking, auditing, and inspecting, that activities affecting the safety-related functions have been correctly performed."

Section 6, "Facility Safety Review Group (Kewaunee)," of Appendix B in the Dominion Nuclear Facility Quality Assurance Program Description, Revision 21 adds new responsibilities for a Facility Safety Review Group for the Kewaunee facility. The Facility Safety Review group does not provide quality oversight for the Kewaunee facility. The responsibility for quality oversight is retained in Section 1.2.6., "Nuclear Oversight" of Dominion Nuclear Facility Quality Assurance Program Description, Revision 21.

Section 1.2.8, "Nuclear Oversight," of the Dominion Nuclear Facility Quality Assurance Program Description, Revision 22 removes the statement, "A management position is responsible for the effective performance of nuclear oversight activities. This position performs independent assessment of facility operations related to quality and safety with the lines of communication to the executive management position responsible for facility operations."

With the removal of the aforementioned statement, please provide clarification on the responsibility of quality oversight for the Kewaunee, Millstone, North Anna, and Surry facilities.

Please submit the response by November 14, 2016. If you have any questions, please do not hesitate to contact me.

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