Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.33, Quality Assurance Program Requirements (Rev. 2) (Operation)
HNP complies with this guide, which endorses ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants, with the following clarifications:

15. Paragraph 5.3.6, Radiation Control Procedures, Discusses certain control programs. As previously stated, paragraph 1, scope, of ANSI N18.7-1976 references those activities involved with being safety-related.
    The radiation protection program is not considered to be in this category but rather a program required to comply with 10CFR 19, 20, 30, 70, 71, and 100. Therefore, HNP shall develop its radiation protection program as stated in Section 12.5 of the HNP UFSAR.
16. Paragraph 5.3.9.3, Emergency Procedures: As directed by the NRC, HNP will follow a format for emergency procedures in accordance with 10CFR 50, Appendix E.
17. Exception to Paragraph C.3 of Regulatory Guide 1.33 and ANSI N18.7-1976 Paragraph 4.3: Independent Review Program requirements are replaced by Section 17.3.3.2, Independent Review. This exception uses NRC Safety Evaluation dated January 13, 2005 to Nuclear Management Company (ADAMS ML050210276).
18. Regulatory position C.4 modifies the audit frequencies in Section 4.5 of ANSI N18.7. Duke Energy takes exception to this regulatory position. The audits of selected aspects of operational phase activities as identified in Section 17.3.3.3.3, Internal Audit Program, are performance based scheduled based on plant performance and importance to safety but at a frequency not to exceed twenty-four months with extensions as allowed in Section 17.3.3.3.7, Audit Frequency Extensions.
19. Paragraph C.5.d of the Regulatory Guide 1.33 will be implemented by adding the clarifying phrase "Where practicable" in front of the fourth sentence of the fifth paragraph. The Regulatory Guide's changing of the two uses of the word "should" in this sentence to "shall" unnecessarily restricts HNP's options on repair or replacement parts. It is not always practicable to test parts prior to use. Modification review in accordance with the provisions of 10CFR 50.59 will be conducted and documented.
    The words "where practical" will be determined by responsible plant management and the results documented.
20. Paragraph C.5.e of Regulatory Guide 1.33 will be implemented subject to the same clarifications made for ANSI N45.2.2.
21. Paragraph C.5.f of Regulatory Guide 1.33 will be implemented with the substitution of the word "practical" for the word "possible" in the last sentence.
22. Paragraph C.5.g of Regulatory Guide 1.33 will be implemented with the addition of the modifier "normally" after each of the verbs (should) which the regulatory guide converts to "shall". It is HNP's intent to fully comply with the requirements of this paragraph, and any conditions which do not fully comply will be documented and approved by the plant staff. In these cases, the reason for the exception shall be retained for the same period of time as the affected preoperational tests.
23. Paragraph 5.2.2, Procedure Adherence describes that for temporary changes to procedures that one of the approvers shall be the supervisor in charge of the shift and hold a senior reactor operator license. To avoid overloading the supervisor in charge of the shift with administrative tasks, any member of operation's management with a senior reactor operator license will be allowed to approve temporary changes to procedures. The change is documented and, if appropriate, reviewed and approved for incorporation in the next revision of the procedure within 14 days of implementation of the temporary change.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.33, Quality Assurance Program Requirements (Rev. 2) (Operation)

HNP complies with this guide, which endorses ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants, with the following clarifications:

24. Paragraph 5.3.10 of ANSI N18.7-1976/ANS-3.2, the last sentence in the first paragraph requires "test and inspection results, shall be documented and evaluated..." also, the last sentence in the second paragraph requires "the test and inspection procedures shall require recording the date, identification of those performing the test or inspection, as-found condition, corrective actions performed, if any, and as-left condition." as an alternative to the records required for inspections outlined in paragraph 5.3.10, HNP shall provide the following as the method to document results of inspections:
    the results of inspections will be documented in appropriate records and those records shall, as a minimum, identify (A) through (H) below:
    (A) authorized individual approving results.
    (B) date of inspection.
    (C) inspector/data recorder.
    (D) item inspected.
    (E) M&TE used.
    (F) reference to information on action taken in connection with non-conformances.
    (G) results or acceptability.
    (H) type of observation.

Regulatory Guide 1.37, Quality Assurance Requirements for Cleaning Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants (Rev. 0)

HNP shall comply with the requirements of ANSI N45.2.1-1973, Cleaning of Fluid Systems and Associated Components During Construction Phase of Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.37-March 1973, with the following clarifications:

1. Paragraph 2.5, Test Equipment, outlines control of inspection and test equipment. HNP has addressed its position relative to measuring & test equipment (M&TE) in 17.3.2.9.
2. Paragraph 5, Installation Cleaning: The recommendation that local rusting on corrosion resistant alloys be removed by mechanical methods is interpreted to mean that local rusting may be removed mechanically, but the use of other removal means is not precluded provided other cleaning methods are not considered detrimental as determined by responsible plant management.
3. The guide and standard are applicable to those areas of the quality assurance program addressing on-site cleaning of materials and components, cleanness control, preoperation cleaning and layup of fluid systems.
4. With regard to paragraph C.3 of Regulatory Guide 1.37: Chromates or other additives, normally in the system water, will not necessarily be added to the flush water.
5. With regard to paragraph C.4 of Regulatory Guide 1.37: Expendable materials, such as inks and related products; temperature indicating sticks; tapes; gummed labels; wrapping materials; water soluble dam materials; lubricants, NDT penetrant materials and couplants, desiccants, which contact stainless steel or nickel alloy surfaces shall be of commercial quality. Levels for halogens, sulfur, chlorides, low melting point metal, etc., for use on stainless steel and nickel alloy surfaces will be as determined by responsible technical group to limit or preclude intergranular cracking and stress corrosion cracking.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants (Rev. 2)
HNP shall comply with the requirements of ANSI N45.2.2-1972, Packing, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.38 with the following clarifications:

1. Paragraph 2.1, Planning: (first sentence) the specific items to be governed by the standard shall be identified. However, the standard is part of the HNP QA program and it will, therefore, be applied to those structures, systems, and components which are included in that program.
2. Paragraph 2.3 - Results - The full requirements of this paragraph shall apply to the inspections and tests that are performed to determine the acceptability of product quality.
3. Paragraph 2.4 - those personnel that perform inspection, examination, and testing activities for verification and acceptance/rejection purposes shall be qualified in accordance with Regulatory Guide 1.58.
4. Paragraph 2.5 - Measuring and Test Equipment (2.5.2) - That equipment which measures quality of the permanent plant items shall be under the calibration and control program; whereas the equipment used to measure secondary conditions, such as warehouse temperature, humidity, etc., will be maintained in good working order and checked for proper functioning when accuracy is in doubt, but not maintained under the calibration and control program. Traceability to calibration records will be provided when it is impractical (because of size, configuration, or application) to physically mark calibration information on the item. Note: M&TE does not include rulers, tape measures, levels, and other devices if normal commercial practices provide adequate accuracy.
5. Paragraph 2.7, Classification of Items: HNP may choose not to explicitly use the four level classification system. However, the specific requirements of the standard that are appropriate to each class will be applied unless justified and documented.
6. Paragraph 2.7.1(3) requires special nuclear material (fuel) and sources to be classified as Level A. HNP shall store new/used nuclear fuel and radioactive sources in storage locations as described in the Chapters 9 and 12 of the UFSAR. Radioactive sources used by HP personnel shall be stored and controlled in accordance with HP practices and procedures.
7. Paragraph 3.2 - Levels of Packaging - Packaging for shipment off-site will be equal to or exceed the original packaging by the vendor, as required to assure the quality of the item is not degraded as a result of shipping or handling.
8. Paragraph 3.4, Methods of Preservation: (first sentence) HNP will comply with these requirements subject to the clarification that the term "deleterious corrosion" means corrosion which cannot be subsequently removed and which adversely affects form, fit, or function.
9. Paragraph 3.6 - Barrier and Wrap Materials and Desiccants - The use of clear plastic in warehouses will be minimized. The guide rule is that the clear plastic shall be used only where periodic visual inspection is necessary.
   Plastic wrap on items supplied in accordance with a vendor's approved QA/QC program will be accepted and stored without rewrapping.
10. Paragraph 3.7, Containers, Crating and Skids: In lieu of the requirements of this paragraph, HNP will use means as determined by responsible plant technical personnel needed to provide adequate protection of the items in storage.
11. Paragraph 4 - Shipping - Requirements of paragraph 4, Shipping, primarily applies to the vendor. Plant functions with regard to return shipments will meet or exceed the methods of the vendor for the item or approved alternatives.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants (Rev. 2)
HNP shall comply with the requirements of ANSI N45.2.2-1972, Packing, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.38 with the following clarifications:

12. Paragraph 5.2.1, Shipping Damage Inspection: Warehouse personnel will normally visually scrutinize incoming shipments for damage of the types listed in this paragraph; this activity is not necessarily performed prior to unloading. Since required items receive the item inspection of paragraph 5.2.2, separate documentation of the shipping damage inspection is not necessary. Release of the transport agent after unloading and the signing for the receipt of the shipment may be all of the action taken to document completion of the shipping damage inspection. Any nonconformances noted will be documented and dispositioned as required by 17.3.2.13. The person performing the visual scrutiny during unloading is not considered to be performing an inspection function as defined under Regulatory Guide 1.74; therefore, while he will be trained and qualified to perform this function, he may not necessarily be certified (N45.2.6) as an inspector.
13. Paragraph 5.2.2, Item Inspection: The need and extent for inspection of items will be determined by responsible plant technical personnel. Receiving inspections shall be performed in an area designated for receipt of material and shall normally be performed in the receiving building. The receiving building and the areas designated will provide adequate protection for the material, but may not comply with all of the specific requirements contained in Section 6 of this standard. Material that is suspected of being compromised during the receiving process shall be evaluated by responsible technical personnel, as determined by plant management.
14. Paragraph 5.2.2(1) - Identification and Marking - Item inspection will include inspection for identification and marking required by the purchase order documents. Marking that is not quality related or which provides no traceability will not be inspected.
15. Paragraph 5.3.1 - Acceptable - Item acceptance status will be indicated by application of tags, stickers, ribbons, or signs. Storage areas are not designated as accept areas except for bulk items.
16. Paragraph 6.1.1 - Scope - The levels and methods of storage for items between the time of removal from the prescribed storage until placement in the installed location may be relaxed as determined by responsible plant management for short periods of time, according to the sensitivity of the item being handled and the elements of contact anticipated during this interval. Where relaxation of storage requirements of this standard are deemed appropriate, the item, conditions, precautions and follow-up inspection for assurance that quality of the item has been maintained will be documented.
17. Paragraph 6.1.2, Levels of Storage: Subpart (2) is replaced with the following:
    (2) Level B items shall be stored within a fire-resistant, weather-tight, and well ventilated building or equivalent enclosure. This building shall be situated and constructed so that it will not normally be subject to flooding; the floor shall be paved or equal, and well drained. If any water comes in contact with stored equipment, such equipment will be labeled or tagged nonconforming, and then the nonconformance document will be processed and evaluated. Items shall be placed on pallets, shoring, or shelves to permit air circulation. The building shall be provided with heating and temperature control or its equivalent to reduce condensation and corrosion. Minimum temperature shall be 40°F and maximum temperature shall be 140°F or less if so stipulated by a manufacturer.
18. Paragraph 6.2.1, Access to Storage Areas: Items which fall within the level d classification of the standard will be stored in areas which may be posted to limit access, but other positive controls such as fencing or guards will not normally be provided.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants (Rev. 2)
HNP shall comply with the requirements of ANSI N45.2.2-1972, Packing, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.38 with the following clarifications:

19. Paragraph 6.2.4, Storage of Food and Associated Items: The sentence is replaced with the following: "The use or storage of food, drinks, and salt tablet dispensers in any storage area shall be controlled and shall be limited to designated areas where such use or storage is not deleterious to stored items."
20. Paragraph 6.2.5, Measures to Prevent Entrance of Animals: The sentence is replaced with the following: "Warehouse personnel shall be alert to detect evidence of rodents or small animals in indoor storage areas.
    Consideration will be given when setting up the system to provide reasonable assurance that rodents or other small animals will not be present. If any such evidence is detected, a survey or inspection will be utilized to determine the extent of the damage; exterminators or other appropriate measures shall be used to control these animals to minimize possible contamination and mechanical damage to stored material."
21. Paragraph 6.3.3, Storage of Hazardous Material: The sentence is replaced with the following: "Hazardous chemicals, paints, solvents, and other materials of a like nature shall be stored in approved cabinets or containers which are not in close proximity to installed safety systems required for safe shutdown."
22. Paragraph 6.4.2, Care of Items: The following alternates are provided for indicated subparts:
    (5) "Space heaters in electrical equipment shall be energized unless a documented engineering evaluation determines that such space heaters are not required."
    (6) "Large (greater than or equal to 50 hp) rotating electrical equipment shall be given insulation resistance tests on a scheduled basis unless a documented engineering evaluation determines that such tests are not required."
    (7) "Prior to being placed in storage, rotating equipment weighing over approximately 50 pounds shall be evaluated by engineering personnel to determine if shaft rotation in storage is required; the results of the evaluation shall be documented. If rotation is required, it shall be performed at specified intervals, and documented.
    The degree of turn shall be established so that the parts receive a coating of lubrication where applicable, and so that the shaft does not come to rest in the position prior to rotation. (90 deg. and 450 deg. rotations are examples.) For long shafts or heavy equipment subject to undesirable bowing, shaft orientation after rotation shall be specified and obtained."
    (8) Other maintenance requirements specified by the manufacturer's instructions shall be evaluated by responsible plant personnel to determine applicability during storage of the item.
23. Paragraph 6.5, Removal of Items from Storage: HNP does not consider the last sentence of this paragraph to be applicable to the operations phase due to the relatively short period of time between installation and use. The first sentence of the paragraph is replaced with: "HNP will develop, issue, and implement a procedure(s) which cover(s) the removal of items from storage. The procedure(s) will assure that the inspection status of all material issued is known, controlled, and appropriately dispositioned."
    When items are released and waiting at a location prior to installation, responsible plant management in accordance with plant procedures will determine and document the extent of inspection and storage requirements.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.38, Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants (Rev. 2)

HNP shall comply with the requirements of ANSI N45.2.2-1972, Packing, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.38 with the following clarifications:

24. Paragraph 6.6, Storage Records: HNP will comply with the requirements of this section with the clarification that, for record purposes, personnel access to storage areas will not be recorded. Unloading or pick-up of material shall not be considered "access," nor shall inspection by NRC or other regulatory agents, nor shall tours by non-HNP employees who are accompanied by HNP employees.
25. Paragraph 7.3 - Hoisting Equipment - The load chart for each crane includes the model number for that crane. This load chart is considered to be "certification" by the manufacturer for that crane as required by paragraph 7.3.1. Likewise, forklifts are considered certified by the manufacturer's literature giving maximum capacity as required by Paragraph 7.3.2. Paragraph 7.3, Hoisting Equipment: Rerating of hoisting equipment will be considered only when absolutely necessary. Prior to performing any lift above the load rating, the equipment manufacturer will be contacted for his approval and direction. The manufacturer will be requested to supply a document granting approval for a limited number of lifts at the new rating and any restrictions involved, such as modifications to be made to the equipment, the number of lifts to be made at the new rating, and the test lift load. At all times, the codes governing rerating of hoisting the equipment will be complied with.
    If rerating of hoisting equipment is necessary and HNP cannot or does not contact the equipment manufacturer as described above, the test weight used in temporarily rerating hoisting equipment for special lifts will be at least equal to 110 percent of the lift weight. A dynamic load test over the full range of the lift using a weight at least equal to the lift weight will be performed.
26. Paragraph 7.4 - Inspection of Equipment and Rigging - Nondestructive examinations will be performed by QC personnel qualified in accordance with Regulatory Guide 1.58 (except as amended by safety analysis report position). Operators will be trained in the operation and maintenance inspections of their assigned equipment.
27. Appendix A.3.5.1 - Caps and Plugs; A.3.5.2, Tapes and Adhesives; and A.3.6.3, Desiccants - Plugs, caps, tapes, adhesives, desiccants, markers and other temporary items will be of commercial quality. Levels for halogens, sulfur, chlorides, low melting point metal, etc., for use on stainless steel and nickel alloy surfaces will be as determined by the responsible technical group to limit or preclude intergranular cracking and stress corrosion cracking.

Regulatory Guide 1.39, Housekeeping Requirements for Water Cooled Nuclear Power Plants (Rev. 2)

HNP complies with the requirements of ANSI N45.2.3-1973, Housekeeping, During the Construction Phase of Nuclear Power Plants, as endorsed by Regulatory Guide 1.39, September 1977, with the following clarifications for:

1. Paragraph 2.1, Planning: The zone designations provided in the standard will be used as a guide in developing plant procedures; however, plant areas will not necessarily be divided into zones I through V. Equivalent controls will be maintained as prescribed in approved procedures.
2. Paragraph 3.5, Surveillance, Inspection, and Examinations: Subparagraph (1) is not applicable during normal operations but will be implemented if large items are to be moved or handled.

Regulatory Guide 1.58, Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel (Rev. 1)
HNP shall comply with NRC Regulatory Guide 1.58, Revision 1, which endorses ANSI N45.2.6-1978, Qualification of Inspection, Examination, and Testing Personnel for Nuclear Power Plants, with the following clarifications:

1. With regard to paragraph 1.2 of ANSI N45.2.6-1978 titled Applicability: HNP elects not to apply the requirements of this guide to those personnel who are involved in the daily operations of surveillance, maintenance, and certain technical and support services whose qualifications are controlled by 17.3 or are controlled by other QA program commitment requirements. Only personnel in the following listed categories will be required to meet ANSI N45.2.6-1978 requirements: (1) nondestructive examination (NDE) personnel (2) QC inspection personnel, and (3) receipt inspection personnel.
2. The fourth paragraph of Paragraph 1.2 requires that the standard be imposed on personnel other than HNP employees. The applicability of the standard to suppliers and contractors will be documented and applied as specified in the procurement documents for each supplier and contractor or in interface agreements for Duke Energy non-nuclear organizations providing services identified in Section 17.3.1.2.3.
3. With regard to Paragraph 2.5 of ANSI N45.2.6-1978 titled Physical: HNP will implement the requirements of this section with the stipulation that, where no special physical characteristics are required, none will be specified. The converse is also true: if no special physical requirements are stipulated by HNP, none are considered necessary. HNP employees receive an initial physical examination to assure satisfactory physical condition; however, only the following listed personnel will receive an annual examination: (1) NDE personnel (2) QC inspection personnel, and (3) receipt inspection personnel. This annual examination shall consist of the near visual acuity using the standard Jaeger's type chart or equivalent test.
4. With regard to Paragraph 3 of ANSI N45.2.6-1978 titled Qualifications: Only personnel performing NDE (such as LP, MT, UT, and RT) are required to be grouped in levels of capability and certified for inspection, review, and evaluation of inspection data, and reporting of inspection and test results. Inspection personnel are qualified based on pre-established experience, education, on-the-job training, written examinations and proficiency tests associated with the specific activity. Proficiency tests are given to personnel performing independent QC inspections and documented acceptance criteria are developed to determine if individuals are properly trained and qualified. Certificates of qualification delineate the functions personnel are qualified to perform. Qualification records are maintained and performance evaluations conducted at least once every three years. If organizations elect to utilize qualifications by levels for non-NDE inspections, Level I inspectors receive a minimum of 4 months experience as Level I before being certified as Level II, in lieu of one year experience recommended by ANSI N45.2.6 Section 3.5.2(1). Organizations identify in their procedures if they qualify their inspectors by Level or by task qualifications. Inspectors are only assigned functions for which they have been qualified.
5. With regard to Paragraph 3.5 of ANSI N45.2.6-1978 titled Education & Experience Recommendations: HNP will certify individual inspectors through training and experience to requirements appropriate to the specific assignment; however, except for NDE, personnel are not required to be classified by levels of capability. The training experience requirements will be directed toward qualifying personnel for specific inspection and testing operations.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.64, Quality Assurance Requirements for the Design of Nuclear Power Plants (Rev. 2)
HNP shall comply with NRC Regulatory Guide 1.64, Rev. 2, which endorses ANSI standard N45.2.11-1974, Quality Assurance Requirements for the Design of Nuclear Power Plants, with the following clarification:
Paragraph C.2(1): For the exceptional circumstance in which the designer's immediate supervisor is the only technically qualified individual available, this review can be conducted by the supervisor, provided that: i) the other provisions of the regulatory guide are satisfied, ii) the justification is individually documented and approved in advance by the supervisor's management, and iii) quality assurance audits cover frequency and effectiveness of the use of supervisors as design verifiers to guard against abuse.
Regulatory Guide 1.74, Quality Assurance Terms and Definitions (Rev. 0)
Regulatory Guide 1.74 endorses ANSI N45.2.10-1973, Quality Assurance Terms and Definitions. The HNP project complies with this guide as described below:
HNP complies with the requirements of this guide with the following clarifications:

1. HNP reserves the right to define additional words or phrases which are not included in this standard. Such additional definitions will be documented in appropriate procedures, manuals, etc.
2. In addition to the standard's definition of "inspection," HNP will use the following: "Inspection (when used to refer to activities that are not performed by quality organization personnel) - examining, viewing closely, scrutinizing, looking over or otherwise checking activities. Personnel performing these functions are not necessarily certified to ANSI N45.2.6."

   When HNP intends for inspection to be performed in accordance with the QA program by personnel certified as required by that program and for activities defined by "Inspection" in ANSI N45.2.10, appropriate references to the plant quality organization which will perform the activity and/or to quality procedures to be used for performing the activity will be made. If such references are not made, inspections are considered under the additional definition given above.
3. In addition to the standard's definition of "procurement documents," HNP will utilize the definitions given in ANSI N45.2.13 and in Regulatory Guide1.74. The compound definition, procurement documents-contractually binding documents that identify and define the requirements which items or services must meet in order to be considered acceptable by the purchaser. They include documents which authorize the seller to perform services or supply equipment, material or facilities on behalf of the purchaser (e.g. contracts, letters of intent, work orders, purchase orders, or proposals and their acceptance, drawings, specifications, or instructions which define requirements for purchase).
4. "Quality assurance program requirements" (not defined in ANSI N45.2.10, but used and defined differently in ANSI N45.2.13) - those individual requirements of the QA program which, when invoked in total or in part, establish the requirements to the quality assurance program for the activity being controlled. Although not specifically used in the operational QA program, ANSIN45.2 may be imposed upon HNP's suppliers.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.74, Quality Assurance Terms and Definitions (Rev. 0)

Regulatory Guide 1.74 endorses ANSI N45.2.10-1973, Quality Assurance Terms and Definitions. The HNP project complies with this guide as described below:

5. "Independent Verification" - Verification that required actions have been completed by an individual other than the person who performed the operation or activity being verified. Such verification will not require confirmation of the identical action when other indications provide assurance or indication that the prescribed activity is in fact complete. Examples include, but are not limited to: verification of a breaker opening by observing remote breaker indication lights; verification of a set point (made with a voltmeter or ammeter for example) by observing the actuation of status or indicating lights are the required panel-meter indicated value; verification that a valve has been positioned by observing the starting or stopping of flow on meter indications or by remote valve position indicating lights.
6. "Audit" (will be a modification of the word - to allow the use of subjective evidence if available - as defined in paragraph 1.4 of ANSI N45.2.12-1977 and paragraph 1.4.3 of ANSI N45.2.23-1978 as opposed to the definition given in ANSI N45.2.10-1973) - A documented activity performed in accordance with written procedures or checklists to verify, by examination and evaluation of objective evidence where available, that applicable elements of the quality assurance program have been developed, documented, and effectively implemented in accordance with specified requirements. An audit should not be confused with surveillance or inspection for the sole purpose of control or product acceptance.

Regulatory Guide 1.88, Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records (Rev. 2)

HNP shall comply with NRC Regulatory Guide 1.88, Rev. 2, which endorses ANSI N45.2.9-1974, Collection, Storage, and Maintenance of QA Records, with the following clarifications:

See standard exception in Table 17-1 Regulatory Guide 1.88 for the appropriate controls on quality in the management of electronic records.

1. Appendix A of ANSI N45.2.9 is not considered to be a mandatory list. This list will be used as a guideline for classifying those documents that need to be maintained as QA records. Whether a particular type of document needs to be classified as a QA record and its appropriate retention period is determined in accordance with records management procedures.
2. Paragraph 1.4, Definitions: The phrase "When the document has been completed" is clarified to mean when the document has received the final review performed by the organizational element responsible for generating or collecting the records. In the case of a record package (plant change request, equipment qualification, etc.) made up of several individual documents, the package will be considered to be the document for the purpose of determining when the document is complete.
3. Paragraph 3.2.1, Generation of Quality Assurance Records: The phrase "Completely filled out" is clarified to mean that sufficient information is recorded to fulfill the intended purpose of the record.
4. Paragraph 3.2.2, Index: The storage location will be delineated in procedures in lieu of in the index. The specific location of a record "within a storage area" is delineated by a computerized indexing system plus a storage area labeling system which provides information by record type and storage medium.
5. Paragraph 4.2, Timeliness: HNP 's contractual agreement with its contractors and suppliers will constitute fulfillment of the requirements of this paragraph.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.88, Collection, Storage and Maintenance of Nuclear Power Plant Quality Assurance Records (Rev. 2)

HNP shall comply with NRC Regulatory Guide 1.88, Rev. 2, which endorses ANSI N45.2.9-1974, Collection, Storage, and Maintenance of QA Records, with the following clarifications:

6. Paragraph 5.4, Preservation: The following clarification is substituted for the current subparagraph 5.4.2: "Records shall not be stored loosely. They shall be secured for storage in file cabinets or on shelving in containers." the following clarification is substituted for the current subparagraph 5.4.3: "appropriate provisions shall be made for special processed records (such as radiographs, photographs, negatives, microfilm, and magnetic media) to prevent or minimize damage from excessive light, stacking, electromagnetic fields, temperature and humidity, etc. Manufacturer's recommendations will be considered as appropriate."
7. Paragraph 5.5, Safekeeping: Routine general office and nuclear site security systems and access controls are provided. No special security systems are required to be established for record storage areas.
8. Paragraph 5.6, Facility: This paragraph provides no distinction between temporary and permanent facilities. To cover temporary storage, the following clarification is added: "complete records may be stored in one-hour fire rated file cabinets until transmitted for permanent storage. In general, records shall not be maintained in temporary storage for more than ninety days after completion.
   Any exceptions to this requirement must be justified, evaluated and approved by the supervisor document services or designee and documented. A list of exceptions shall be maintained and available for NRC review. Exceptions may include records needed on a continuing basis for an extended period of time at the location of the work group responsible for generating the records and records which are cumulative in nature and could best be turned over for storage for a designated period of time.
9. Paragraph 5.6, subparagraph 3, is clarified to require a two-hour minimum fire rating to be consistent with the 1979 version of the standard and NRC Criteria for Record Storage Facilities (Guidance - ANSI N45.2.9, Section 5.6) issued 7/1/80.
10. Paragraph 5.6, subparagraph 9, is clarified to read: "No pipes or penetrations except those providing fire protection, lighting, temperature/humidity control or communications are to be located within the facility. All such penetrations shall be sealed or dampened to comply with a minimum two-hour fire protection rating."
11. Additional clarification for QA records is provided in Section 17.3.2.15.
12. See standard exception in Table 17-1 Regulatory Guide 1.88 for the appropriate controls on quality in the management of electronic records.
13. See standard exception in Table 17-1 Regulatory Guide 1.88 for the appropriate controls on quality in the management of electronic records.

Regulatory Guide 1.94, Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants (Rev. 1)

HNP complies with the requirements and guidance of ANSI N45.2.5-1974, Supplementary Quality Assurance Requirements for Installation Inspections and Testing of Structural Steel During the Contract Phase of Nuclear Power Plants, as it is referenced in Regulatory Guide 1.94, Rev. 1, with the following clarifications:

A) Paragraph 2.1, Planning: Requirements, as determined by responsible plant management, will be incorporated into procedures.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.94, Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants (Rev. 1)
HNP complies with the requirements and guidance of ANSI N45.2.5-1974, Supplementary Quality Assurance Requirements for Installation Inspections and Testing of Structural Steel During the Contract Phase of Nuclear Power Plants, as it is referenced in Regulatory Guide 1.94, Rev. 1, with the following clarifications:
B) Paragraph 2.3, Results, Will be implemented as set forth in Sections 17.3.2.12, 17.3.2.8, and 17.3.2.15 and Regulatory Guide 1.33. C) Paragraph 2.5 of ANSI N45.2.5, Measuring & Test Equipment, Requires certain controls over this type of equipment. The equipment listed shall be included in the calibration control program; however, the basis and control of measuring and test equipment is that stated in Section 17.3.2.9. D) The cement test frequency for standard physical and chemical properties is in accordance with ASTM C 183, on the basis of one test per daily production at the cement plant, reference ANSI N45.2.5, Table B. Table B also lists a test frequency for ASTM C 235 which has been discontinued by ASTM. HNP plans to discontinue testing in accordance with ASTM C 235. Acceptance of aggregates for durability/hardness will be in accordance with ASTM C 131 OR C 535, Los Angeles Abrasion Test. E) Gradation - In addition to the gradations listed in ASTM C-33, an aggregate designated 78-M (State of North Carolina designation) is used in special areas such as around major penetrations or in reinforcing steel congested areas, with the approval of the engineers. This aggregate meets all other qualifications of ASTM C-33, with the exception of gradation analyses. The results during preliminary concrete mix design have been satisfactory and in accordance with the requirements of ASME Section III, Division 2/ACI-359 code. F) Paragraph 5.4, High Strength Bolting: Bolting connection points will be visually inspected in accordance with ANSI N45.2.5-1974 except that bolt length will be checked to ensure bolts are long enough as indicated by the point of the bolts being flush with or outside the face of the nuts in accordance with ANSI N45.2.5-1978.
Regulatory Guide 1.116, Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems, (Rev. 0-R)
HNP complies with the requirements of ANSI N45.2.8-1975, Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.116, Revision O-R, June 1976, with the following clarifications:
1. Paragraph 2.1, Planning: Requirements, as determined by responsible plant management, will be incorporated into procedures. 2. Paragraph 2.3, results, will be implemented as set forth in Section 17.3.2.12 and by compliance with RG 1.33. 3. Paragraph 2.8, Measuring and Test Equipment - HNP has addressed this requirement for the operational phase of the plant in Section 17.3.2.9. 4. Paragraph 2.9, Prerequisites, References requirements of other standards. HNP has addressed applicable standards in the appropriate sections of the HNP UFSAR in lieu of the requirements of this paragraph. The extent to which this paragraph applies will be determined by responsible plant management based on end use and complexity of the item. 5. Paragraph 3.3, Processes and Procedures: "Approved instructions" are interpreted to include vendor manuals.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.116, Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems, (Rev. 0-R)

HNP complies with the requirements of ANSI N45.2.8-1975, Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.116, Revision O-R, June 1976, with the following clarifications:

6. Paragraph 4.6, Care of Items: This will be done as outlined in the position on Regulatory Guide 1.38.
7. Paragraph 5, including subparagraphs 5.1 through 5.4, Installed Systems, Inspections and Tests: Responsible plant management will determine the extent to which the elements in this paragraph are applied when developing test requirements for inclusion in modification procedures. In some cases, testing requirements may be met by post-installation surveillance testing in lieu of a special post-installation test.

Regulatory Guide 1.123, Quality Assurance Requirements for Control or Procurement of Items and Services for Nuclear Power Plants, (Rev. 1)

HNP shall comply with the requirements of ANSI N45.2.13-1976, Quality Assurance Requirements for Control or Procurement of Items and Services for Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.123 with the following clarifications:

1. Paragraph 1.2.2, Purchaser's Responsibilities: Item C is one of the options which may be used by HNP to assure quality; however, any of the options given in 10CFR50, Appendix B, Criterion VII as implemented by 17.3 may also be used. Evaluation of supplier's QA program will be conducted as determined depending on complexity and end use of item.
2. Paragraph 3.1, Procurement Document Preparation, Review and Control Change: The changed document may not always be as reviewed by the originator; however, at least an equivalent level shall review and approve any changes.
3. Paragraphs 3.2.3, 3.2.4, and 3.2.6 - HNP does not consider that these paragraphs or vendor qualifications apply for the procurement of off-the-shelf items. Off-the-shelf items (which include original as well as spare and replacements) are Commercial Grade Items which are defined in 10CFR 21.
   Special quality verification requirements shall be determined, as necessary, by responsible technical group to assure acceptability of the item. The responsible technical organization will review purchase requisitions of items classified as "commercial grade" to assure proper application of the 10CFR 21 criteria.
   See standard exceptions in Table 17-1 for Regulatory Guide 1.123 for the procurement of Commercial Grade Items and services including, purchasing commercial-grade calibration services from calibration laboratories.
4. Paragraph 3.3 requires procurement documents to be reviewed prior to bid or award of contract. The documented review of procurement documents is provided through review of the procurement specification and purchase requisition by the responsible technical organization prior to bid or award of contract.
5. Paragraph 3.4, Procurement Document Control: HNP will meet the requirements of 17.3 in lieu of the requirements specified in this paragraph.
6. Paragraph 4.2, Selection Measures, Outlines certain methods acceptable for the selection of suppliers. HNP's history of using similar methods has proven adequate in the procurement of items; therefore, HNP wishes to replace paragraph 4.2(a), (b), and (c) with the following selection methods:

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.123, Quality Assurance Requirements for Control or Procurement of Items and Services for Nuclear Power Plants, (Rev. 1)
HNP shall comply with the requirements of ANSI N45.2.13-1976, Quality Assurance Requirements for Control or Procurement of Items and Services for Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.123 with the following clarifications:

1) The supplier's quality assurance capabilities as determined by a direct survey of his facilities and personnel, and the implementation of his quality assurance program.
2) Evaluating the supplier's history of providing a product which performs satisfactorily in actual use. One or more of the following information shall be evaluated:
   (i) Experience of users of identical or similar products of the same prospective supplier.
   (ii) HNP's records that have been accumulated in connection with previous procurement actions and product operating experience. Historical data should be representative of the supplier's current capability. If there has been no recent experience with the supplier, or if he is a new supplier, the prospective supplier shall be requested to submit information on a similar item or service for evidence of his current capabilities.
   (iii) Evaluating the supplier's current quality records supported by documented qualitative and quantitative information which can be objectively evaluated.
   This would include review and evaluation of the supplier's quality assurance program manual and procedures, as appropriate, to ensure that the applicable requirements of 10CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants" are met.
   (iv) Verification that the supplier holds an active certificate of authorization from the ASME to supply or manufacture materials or the item(s) described in the purchase requisition. A supplier may be considered acceptable, without a survey, to supply off-the-shelf items. An inspection shall be performed to assure that the correct item was received and no damage exists.
   Verification that the supplier is listed in the current NUPIC (Nuclear Procurement Issues Committee) database. However, the audit report which formed the basis for listing the supplier in the NUPIC database must be obtained and reviewed for applicability to the procurement. All deficiencies which could degrade the procured item must be resolved prior to the procurement. This review shall be documented and, together with the audit report, be retained.
3) See standard exceptions in Table 17-1 for Regulatory Guide 1.123 for the procurement of Commercial Grade Items and services including, purchasing commercial-grade calibration services from calibration laboratories.

7. Paragraphs 5.2 and 5.3 shall be applied to the extent determined by responsible plant management based on complexity of the item and its end use. It is not intended that these paragraphs be applied to spares or replacement parts that do not change original design intent.
8. Paragraph 6.1, General, Outlines methods for monitoring and evaluating supplier performance. HNP wishes to replace paragraph 6.1(a), (b), (c), (d), and (e) with the following methods for monitoring and evaluating supplier performance:
   A. Reviewing documents generated or processed during activities fulfilling procurement requirements.
   B. Reviewing LER'S.
   C. Periodic audits.
   D. Annual evaluations.
   E. Those controls specified 17.3.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.123, Quality Assurance Requirements for Control or Procurement of Items and Services for Nuclear Power Plants, (Rev. 1)
HNP shall comply with the requirements of ANSI N45.2.13-1976, Quality Assurance Requirements for Control or Procurement of Items and Services for Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.123 with the following clarifications:

9. Paragraph 6.4, Control of Changes in Items or Services: Since ANSI N45.2 does not apply to the operational phase, equivalent controls outlined in ANSI N18.7-1976 will be used in lieu of the requirements of ANSI N45.2, Section 7.
10. Paragraph 7.4, Measuring and Test Equipment, outlines certain measures to be taken. HNP for the operating phase has addressed the topic of measuring and test equipment in 17.3.2.9 in lieu of the requirements in this paragraph.
11. Paragraph 8 provides guidance for purchaser review and disposition of vendor nonconformances. HNP, as purchaser, requires as a minimum deviations to procurement documents and previously approved supplier documents that cannot be brought into conformance prior to shipment of the material to be submitted to dep for approval. Such deviations, when approved by purchaser, are required to be submitted along with shipment of the material. Additionally, paragraph 8.2, disposition: the third sentence of item b is revised to read:
    Nonconformances to the contractual procurement requirements or purchaser approved documents which consist of one or more of the following shall be submitted to the purchaser for approval of the recommended disposition prior to shipment, when the nonconformance could adversely affect the end use of a *module or shippable component relative to safety, interchangeability, operability, reliability, integrity, or maintainability:
    A. Technical or material requirement is violated;
    B. Requirement in supplier documents, which have been approved by the purchaser, is violated;
    C. Nonconformance cannot be corrected by continuation of the original manufacturing process or by rework; and/or
    D. The item does not conform to the original requirement, even though the item can be restored to a condition such that the capability of the item to function is unimpaired.
    A module is any assembly of interconnected components which constitute an identifiable device, instrument, or piece of equipment. A module can be disconnected, removed as a unit, and replaced with a spare. It has definable performance characteristics which permit it to be tested as a unit. A module could be a card or other subassembly of a larger device, provided it meets the requirements of this definition.
12. Regulatory Position C.3 indicates that purchaser should verify the implementation of the supplier's corrective action systems when such a system is required, but this verification need not be included as part of the purchaser's corrective action measures.
    HNP interprets this statement to mean that once corrective action has been verified by purchaser on nonconforming vendor items, the items can be released for use in its intended application.
    The cause and action to preclude recurrence of deficiencies is the responsibility of the vendor, and independent verification of such vendor action by purchaser or vendor notification of such action to purchaser, is not required on the basis that the vendor's QA program has been accepted by the purchaser. The QA program provides for determining cause and action to preclude recurrence on significant deficiencies, and purchaser audits are conducted to ensure vendor's compliance with his accepted QA program commitments. In addition, HNP will provide overview of those causes and corrective action activities associated with items of high volume and which are considered significant to safety in cases where vendor's recent performance has appeared marginal.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.123, Quality Assurance Requirements for Control or Procurement of Items and Services for Nuclear Power Plants, (Rev. 1)

HNP shall comply with the requirements of ANSI N45.2.13-1976, Quality Assurance Requirements for Control or Procurement of Items and Services for Nuclear Power Plants, as it is endorsed by Regulatory Guide 1.123 with the following clarifications:

13. Paragraph 10.2a: HNP will comply with this paragraph to the extent that for non-code items, certificates of compliance will be traceable only to the purchase order and not to the specific item.

Regulatory Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants (Rev. 0)

HNP shall comply with requirements of Regulatory Guide 1.144, January 1979, which endorses ANSI N45.2.12-1977, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants, with the following clarifications.

1. C.3.(B)(2): The concepts of when audits are required, i.e., annually, triennially, will be complied with; however, such audits would only be required of the vendor if the vendor is involved with an active contract/procurement document. This concept is as discussed in paragraphs 3.5.3.1 and 3.5.3.2 of ANSI N45.2.12-1977.
   See standard exceptions in Table 17-1 for Regulatory Guide 1.123 for the procurement of Commercial Grade Items and services including, purchasing commercial-grade calibration services from calibration laboratories.
2. Paragraph 2.3, Training: The training of HNP audit personnel will be accomplished as described in HNP's position on Regulatory Guide 1.146.
3. Paragraph 2.4, Maintenance of Proficiency: The maintenance of proficiency of HNP audit personnel will be accomplished as described in HNP's position on Regulatory Guide 1.146.
4. Paragraph 3.2.2 indicates that objective evidence is to be examined and evaluated. HNP believes that the use of subjective evidence is also an important element of the audit program. See paragraph 4.3.2 clarifications below.
5. Paragraph 3.3, Essential Elements of the Audit System; HNP will comply with subparagraph 3.3.5 as it was originally written (subparagraph 3.2.5) in ANSI N45.2.12, Draft 3, Revision 4: "Provisions for reporting on the effectiveness of the quality assurance program to the responsible management." For the audited organization, effectiveness is reported as required in Section 17.3.3.3 and by audit procedures. Other than audit reports, HNP may not directly report on the effectiveness of the quality assurance programs to the audited organization, when such organizations are outside of Duke Energy.
   Subparagraph 3.3.7 requires verification of effective corrective action on a "timely basis". Timely basis is interpreted to mean within the period of time that is accepted by the organization. Each finding requires a response and a corrective action completion date. These dates are subject to revision and must be escalated to higher authority when there is a disagreement between the audited and the auditing organization on what constitutes "timely corrective action."

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants (Rev. 0)
HNP shall comply with requirements of Regulatory Guide 1.144, January 1979, which endorses ANSI N45.2.12-1977, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants, with the following clarifications.

6. Paragraph 4.3.1, Preaudit Conference: HNP will comply with the requirement of this paragraph by inserting the word "normally" at the beginning of the first sentence. This clarification is required because, in the case of certain unannounced audits or audits of a particular operation or work activity, a preaudit conference might interfere with the spontaneity of the operation or activity being audited. In other cases, persons who should be present at a preaudit conference may not always be available. Such lack of availability should not be an impediment to beginning an audit. Even in the above examples, which are not intended to be all inclusive, the material set forth in paragraph 4.3.1 will normally be covered during the course of the audit.
7. Paragraph 4.3.2, Audit/Assessment Process:
   A. Subparagraph 4.3.2.2 could be interpreted to limit auditors to the review of only objective evidence. Sometimes objective evidence may not be available; therefore, HNP will comply with an alternate sentence which reads: "When available, objective evidence shall be examined for compliance with quality assurance program requirements. If subjective evidence is used (e.g., personnel interviews, direct observations by the auditor), then the audit report or checklist must indicate how the evidence is obtained."
   B. Subparagraph 4.3.2.4 is modified as follows to take into account the fact that some nonconformances are virtually "obvious" with regards to the needed corrective action. As a result of this, HNP proposes the following alternate words: "When a nonconformance or quality assurance program deficiency is identified as a result of an audit, unless the apparent cause, extent, and corrective action is readily evident, further investigations shall be conducted by the audited organization in an effort to identify the cause and effect and to determine the extent of the corrective action required."
   C. Subparagraph 4.3.2.5 contains a statement "acknowledged by a member of the audited organization." This is clarified to mean that "A member of the audited organization has been informed to the findings. Agreement or disagreement with a finding may be expressed in the response from the audited organization."
   D. Subparagraph 4.3.2.6 is modified as follows to account for the fact that immediate notification is not always possible: "Conditions requiring immediate corrective action (i.e., those which are so severe that any delay would be undesirable) shall be reported as immediately as practical to management of the audited organization."
8. Paragraph 4.3.3, Post Audit Conference: HNP will substitute and comply with the following paragraphs: "For all external audits, a postaudit conference shall be held with management of the audited organization to present audit findings and clarify misunderstandings. Where no adverse findings exist, this conference may be waived by management of the audited organization. Such waiver shall be documented in the audit report. For all internal audits unless unusual operating or maintenance conditions preclude attendance by appropriate managers/supervisors, an audit debrief shall be held with managers/supervisors. If there are no adverse findings, management of the internal assessed organization may waive the audit debrief. Such waiver shall be documented in the audit report."
9. Paragraph 4.4, Reporting:

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants (Rev. 0)
HNP shall comply with requirements of Regulatory Guide 1.144, January 1979, which endorses ANSI N45.2.12-1977, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants, with the following clarifications.

A. This paragraph requires that the audit report shall be signed by the audit team leader which is not always the most expeditious route for the audit report to be issued as soon as practical. HNP will comply with Paragraph 4.4 as clarified by the following words: "An audit report, which shall be signed by the unit team leader, or his supervisor in the absence of the audit team leader shall provide:" in cases where the audit report is not signed by the lead auditor due to his absence, the record copy of the report must be signed by the lead auditor upon his return. The report shall not require the lead auditor's review/concurrence/signature if the lead auditor is no longer employed by HNP at the time audit report is issued.

B. HNP will comply with subparagraph 4.4.3 clarified to read: "Supervisory level personnel with whom significant discussions were held during the course of preaudit (where conducted), audit, and postaudit (where conducted) activities.

C. Audit reports may not necessarily contain an evaluation statement regarding the effectiveness of the quality assurance program elements which were audited, as required by subparagraph 4.4.4, but they will provide an effectiveness summary of the audited areas."

D. Subparagraph 4.4.6 - Nuclear Oversight section management will determine the need for audit reports to include recommendations for corrective actions.

E. HNP will comply with the last paragraph of Section 4.4 of ANSI N45.2.12 concerning issuing audit reports with the following clarification: "Audit reports shall be issued within thirty working days after the last day of the audit. The last day of an audit shall be considered to be the day of the post-audit conference. If a post-audit conference is not held because it was deemed unnecessary, the last day of the audit shall be considered to be the date the post-audit conference was deemed unnecessary as documented in the audit report."

10. Paragraph 4.5.1, By Audited Organization: HNP will comply with the following clarification of this paragraph:
"Management of the audited organization or activity shall review and investigate all adverse audit findings, as necessary, (cause, etc.) to determine and schedule appropriate corrective action including action to prevent recurrence. They shall respond, in writing, within thirty days after the date of receipt of the audit report. The response shall clearly state the corrective action taken or planned to prevent recurrence and the results of the investigation if conducted. In the event that corrective action is not completed by the time the response is submitted, the audited organization's response shall include a scheduled date for completion of planned corrective action. A follow-up response shall be provided stating the corrective action was completed.
If corrective actions are verified as satisfactorily completed by the quality organization prior to the scheduled completion date or when completion of corrective action can be verified during a follow-up audit, no follow-up response is required. The audited organization shall take appropriate action to assure that corrective action is accomplished as scheduled."
11. Paragraph 5 - audit checklists are not considered QA records. HNP believes that actual audit reports provide sufficient detail to substantiate the results of the audit, and the checklist is maintained as an audit "tool" versus a QA record. Additionally, the audit checklist need only document objective evidence examined to support the audit findings.

Table B17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.146, Qualification of QA Program Audit Personnel for Nuclear Power Plants (Rev. 0, 8/80)
HNP shall comply with requirements of Regulatory Guide 1.146, August 1980, which endorses ANSI N45.2.23-1978, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants with the following clarifications.

1. Paragraph 2.2, Qualification of Auditors: subparagraph 2.2.1 references an "ANSI B45.2" (presumed to be N45.2); therefore, HNP will comply with an alternate subparagraph 2.2.1 which reads:
   "Orientation to provide working knowledge and understanding of the HNP QA program, including the ANSI standards and Regulatory Guides included in the program, and Duke Energy's procedures for implementing audits and reporting results."
2. Paragraph 4.1, Organization Responsibility: HNP will comply with this paragraph with the substitution of the following sentence in place of the last sentence in the paragraph.
   "The NOS manager or the audit team leader shall, prior to commencing the audit, assign personnel who collectively have experience or training commensurate with the scope, complexity, or special nature of the activities to be audited."
3. Paragraph 5.3, Updating of Lead Auditor's Records: HNP will substitute the following sentence for this paragraph:
   "Records for each lead auditor shall be maintained and updated during the period of the annual management assessment. This annual management assessment shall be as defined in the clarification for Paragraph 3.2 noted above."
4. ANSI N45.2.23, Paragraph 2.3.4 states, "The prospective lead auditor shall have participated in a minimum of five (5) quality assurance audits within a period of time not to exceed three (3) years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit within the year prior to qualification."
   HNP substitutes the following instead of the cited sentence of ANSI N45.2.23, Paragraph 2.3.4:
   "Prospective lead auditors shall demonstrate the ability to effectively implement the audit process and effectively lead an audit team. This process is described in written procedures that provide for evaluation and documentation of the results of this demonstration. In addition, the prospective lead auditor shall have participated in at least two nuclear quality assurance audits within the year preceding the individual's effective date of qualification. Upon successful demonstration of the ability to effectively implement the audit process and effectively lead audits, and having met the other provisions of Section 2.3 of ANSI N45.2.23-1978, the individual may be certified as being qualified to lead audits."

Table B17-2. Site Specific Response to Regulatory Guides and Industry Standards

Table B17-2 identifies additional Regulatory Guides addressing subjects related to implementation of the QAP but the implementation is site specific and controlled with the UFSAR in accordance with 10 CFR 50.59.

Regulatory Guide 1.8, Personnel Selection and Training
Personnel selection and training is site specific. Harris addresses conformance with Regulatory Guide 1.8 in UFSAR Chapter 1 Section 8.

Regulatory Guide 1.26, Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants
Quality group classifications and standards trace to the original design and construction of the nuclear power plant and therefore are site specific. Harris addresses conformance with Regulatory Guide 1.26 in UFSAR Chapter 1 Section 8.

Regulatory Guide 1.29, Seismic Design Classification
Seismic design classification trace to the original design and construction of the nuclear power plant and therefore is site specific. Harris addresses conformance with Regulatory Guide 1.29 in UFSAR Chapter 1 Section 8.

Regulatory Guide 1.36, Nonmetallic Thermal Insulation for Austenitic Stainless Steel
Nonmetallic thermal insulation for austenitic stainless steel trace to the original design and construction of the nuclear power plant and therefore is site specific. Harris addresses conformance with Regulatory Guide 1.36 in UFSAR Chapter 1 Section 8.

Regulatory Guide 1.54, Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants
Quality assurance requirements for protective coatings applied to water-cooled nuclear power plants trace to the original design and construction of the nuclear power plant and therefore is site specific. Harris addresses conformance with Regulatory Guide 1.54 in UFSAR Chapter 1 Section 8.

Table B17-2. Site Specific Response to Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.143, Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants
Design guidance for radioactive waste management systems, structures, and components installed in light-water-cooled nuclear power plants trace to the original design and construction of the nuclear power plant and therefore is site specific. Harris addresses conformance with Regulatory Guide 1.143 in UFSAR Chapter 1 Section 8.

Regulatory Guide 1.155, Station Blackout
Addressing Station Blackout is site specific. Harris addresses conformance with Regulatory Guide 1.155 in UFSAR Chapter 1 Section 8.

Regulatory Guide 4.15, Quality Assurance for Radiological Monitoring Programs (Normal Operations) – Effluent Streams and the Environment
Quality assurance for radiological monitoring program (normal operations) – effluent streams and the environment is site specific. Harris does not address conformance to Regulatory Guide 4.15 in UFSAR Chapter 1 Section 8. The radiological monitoring program is addressed in UFSAR Chapter 11.

B17.3.1 MANAGEMENT

B17.3.1.1 Methodology

There are no Harris specific amplifications for this section.

B17.3.1.2 Organization

There are no Harris specific amplifications for this section.

B17.3.1.3 Responsibility

There are no Harris specific amplifications for this section.

B17.3.1.4 Authority

The program and procedures require that the authority and duties of persons and organizations performing activities affecting quality be clearly established and delineated in writing and that these individuals and organizations have sufficient authority and organizational freedom to:

1. Identify quality, nuclear safety, and performance problems.
2. Order unsatisfactory work to be stopped and control further processing, delivery, or installation of nonconforming material.
3. Initiate, recommend, or provide solutions for conditions adverse to quality.
4. Verify implementation of solutions.

B17.3.1.5 Personnel Training and Qualification

There are no Harris specific amplifications for this section.

B17.3.1.6 Corrective Action

The program requires that an evaluation of adverse conditions such as conditions adverse to quality, nonconformances, failures, malfunctions, deficiencies, deviations, and defective material and equipment is conducted to determine need for corrective action. Conditions adverse to quality are identified through inspections, assessments, tests, checks, and review of documents.

The program requires corrective action to be initiated to preclude recurrence of significant conditions adverse to quality.

For significant conditions adverse to quality, procedures require follow-up reviews, verifications, inspections, etc., to be conducted to verify proper implementation of corrective action and to close out the corrective action documentation.

The program outlines the methodology for resolution of disputes involving quality and nuclear safety issues arising from a difference of opinion between identifying personnel and other groups.

Significant conditions adverse to quality are reported to appropriate management for review and evaluation.

Periodic review and evaluation of adverse trends are performed by management.

B17.3.1.7 Regulatory Commitments

There are no Harris specific amplifications for this section.

B17.3.2 PERFORMANCE/VERIFICATION

B17.3.2.1 Methodology

There are no Harris specific amplifications for this section.

B17.3.2.2 Design Control

Controls are applied to the development, content and use of computer codes to ensure (1) the codes are developed, documented, verified and certified for use per approved procedures; (2) the codes are properly controlled to preclude use of outdated or obsolete codes; (3) that proper instructions concerning the use of the codes are provided; and (4) adequate QA provisions are implemented for the procurement of computer codes.

B17.3.2.3 Design Verification

There are no Harris specific amplifications for this section.

B17.3.2.4 Procurement Control

Potential contractors and suppliers are evaluated prior to award of a procurement contract when needed to assure the contractor's or supplier's capability to comply with applicable technical and quality requirements.

Procurement documents, such as purchase specifications, contain or reference the following:

1. Technical, administrative, regulatory, and reporting requirements, including material and component identification requirements, drawings, specifications, codes and industrial standards, test and inspection requirements, and special process instructions.
2. Identification of the documentation to be prepared, maintained, or submitted (as applicable) to HNP for review and approval. These documents may include, as necessary, inspection and test records, qualification records, or code required documentation.
3. Identification of those records to be retained, controlled, and maintained by the supplier, and those delivered to the purchaser prior to use or installation of the hardware.

Procurement documents require suppliers to operate in accordance with QA programs which are compatible with the applicable requirements of the HNP QA Program and procedures where their services are utilized in support of plant activities.

B17.3.2.5 Procurement Verification

There are no Harris specific amplifications for this section.

B17.3.2.6 Identification and Control of Items

Procedures require that materials, parts, and components be identified and controlled to prevent the use of incorrect or defective items.

These procedures also require that identification of items be maintained either on the item in a manner that does not affect the function or quality of the item, or on records traceable to the item.

Procedures implementing these requirements provide for the following:

1. Verification that items received at the plant are properly identified and can be traced to the appropriate documentation, such as drawings, specifications, purchase orders, manufacturing and inspection documents, nonconformance reports, or material test reports.
2. Verification of item identification consistent with the HNP inventory control system and traceable to documentation which identifies the proper uses or applications of the item.
3. Verification of correct identification of material, parts and components prior to fabrication, assembly installation or use, and results documented.

B17.3.2.7 Handling, Storage, and Shipping

Provisions are established to control the shelf life and storage of chemicals, reagents, lubricants, and other consumable materials.

B17.3.2.8 Test Control

Test procedures incorporate or reference the following, as required:

1. Instructions and prerequisites for performing the test.
2. Use of proper test equipment.
3. Mandatory inspection hold points.
4. Acceptance criteria.

Test results are documented, evaluated, and their acceptability determined by a qualified, responsible individual or group.

When the acceptance criteria is not met, affected areas are to be retested or evaluated, as appropriate.

B17.3.2.9 Measuring and Test Equipment Control

Portable measuring and test equipment is calibrated by standards which are at least four times as accurate as the portable measuring and test equipment, unless limited by the state of the art. In cases where the accuracy is not achievable or is limited by the state of the art, an engineering evaluation or other appropriate justification is performed and documented to justify acceptability of the M&TE in question. The evaluation is reviewed in accordance with approved procedures.

Calibration of installed plant devices shall be against M&TE having sufficient accuracy, greater than the device being calibrated, to assure that the system containing the device is within the specified system tolerance. The basis for determining the "greater than accuracy" shall be documented.

Reference and transfer standards are traceable to nationally recognized standards; or where national standards do not exist, provisions are established to document the basis for the calibration.

B17.3.2.10 Inspection, Test, and Operating Status

These procedures include the application, removal, and verification of inspection and welding stamps, or other status indicators as appropriate.

Altering the sequence of required tests, inspections, and other operations important to safety can only be accomplished by methods outlined in procedures.

B17.3.2.11 Special Process Control

There are no Harris specific amplifications for this section.

B17.3.2.12 Inspection

There are no Harris specific amplifications for this section.

B17.3.2.13 Corrective Action

The primary goal of the corrective action program is to improve overall plant operations and performance by identifying and correcting root causes of equipment and human performance problems.

Procedures define requirements for a corrective action program that charges personnel working at or supporting the nuclear plants with the responsibility to identify adverse conditions (including conditions adverse to quality).

Procedures include requirements for verification of the acceptability of the rework/repair of items by reinspection and/or testing in accordance with the original inspection or test requirements or by an accepted alternative inspection and testing method.

Conditions that require rework/repairs are identified through the use of maintenance work request forms.

B17.3.2.14 Control of Documents

Changes to documents are reviewed and approved by the same organization that performed the original review and approval or by other designated qualified responsible organizations.

B17.3.2.15 Records

The structure in which single copy records are maintained is designed to prevent destruction, deterioration, or theft. This structure ensures protection against destruction by fire, flooding, theft, and deterioration by the environmental conditions of temperature and humidity.

B17.3.3 ASSESSMENT

B17.3.3.1 Methodology

There are no Harris specific amplifications for this section.

B17.3.3.2 Independent Review

There are no Harris specific amplifications for this section.

B17.3.3.3 Independent Assessment

There are no Harris specific amplifications for this section.

B17.3.3.3.1 Organization

There are no Harris specific amplifications for this section.

B17.3.3.3.2 Internal Assessment Process

There are no Harris specific amplifications for this section.

B17.3.3.3.3. Internal Audit Program

B17.3.3.3.3.1 Other Reviews Prescribed by the Code of Federal Regulations

There are no Harris specific amplifications for this section.

B17.3.3.3.3.2 Independent Audit of Fire Protection Program

There are no Harris specific amplifications for this section.

B17.3.3.3.4 Results

There are no Harris specific amplifications for this section.

B17.3.3.3.5 Supplier Oversight

There are no Harris specific amplifications for this section.

B17.3.3.3.6 Independent Audit of QA Functions

There are no Harris specific amplifications for this section.

B17.3.3.3.7 Audit Frequency Extensions

There are no Harris specific amplifications for this section.

B17.3.4 ADMINISTRATIVE CONTROLS

This section was added to the HNP UFSAR description of the QA Program to relocate certain administrative controls from HNP Technical Specifications. These relocated administrative controls include Review and Audit, Procedure Review Requirements, and Record Retention.

Review and Audit

B17.3.4.1 10CFR50.59 and technical reviews

There are no Harris specific amplifications for this section.

B17.3.4.2 Plant Nuclear Safety Committee (PNSC)

This content is addressed in Section 17.3.3.2, Independent Review.

B17.3.4.3 HNP Independent Review Program

This content is addressed in Section 17.3.3.2, Independent Review.

B17.3.4.4 Independent Safety Engineering Group

B17.3.4.4.1 Organization

The Independent Safety Engineering Group (ISEG) functions of improving licensee safety performance and ability to respond to accidents by providing onsite technical support and continuous evaluation and feedback of lessons learned from operating experience are performed by a combination of different groups through the performance of their normal activities.

B17.3.4.4.2 Activities

Key ISEG activities are outlined below with the groups that currently perform these activities:

1. Examination of Unit Operating Characteristics:
    - HNP has an established Corrective Action Program that includes processes for the identification, classification, trending and correcting of conditions adverse to quality.
    - NOS performs independent monitoring and audit of activities as defined in Section 17.3.3.3.
    - HNP has implemented a Maintenance Rule Program that provides reasonable assurance that structures, systems, trains, and components are capable of fulfilling their intended safety significant functions.
    - Harris Engineering Section has implemented a program that provides for the systematic trending of system and component performance to determine the effectiveness of system/component maintenance
    - A corporate Probabilistic Safety Assessment Unit has been established with the mission of maintaining and updating plant specific risk models and risk based tools that are used to provide risk insights and tools to: support on-line maintenance and outage risk assessments; support the Maintenance Rule Program; evaluate proposed plant changes for risk impact; monitor the risk effectiveness of plant on-line maintenance activities; and support other regulatory activities.
2. Examination of NRC Issuances, Industry Advisories, and Licensee Event Reports and other Sources of Unit Design Information which May Indicate Areas of Improving Unit Safety:
    - Duke Energy has implemented an Operating Experience (OE) Program that provides for the receipt, processing, status reporting, screening, reviewing, evaluating, and taking preventive/corrective actions in response to OE information.
    - The Nuclear Oversight organization independently evaluates the use of OE in the conduct of audits.
    - The On-Site Review Committee reviews License Event Reports developed pursuant to 10CFR50.73 as part of the Independent Review in Section 17.3.3.2.
3. Review of Plant Operations, Modifications, Maintenance, and Surveillances to Verify Independently that these Activities are Performed Safely and Correctly and that Human Errors are Reduced as Much as Practical:
    - NOS audits in Section 17.3.3.3 and the Independent Review Program in Section 17.3.3.2accomplish this function.

B17.3.4.5 Outside agency inspection and audit program

The fire protection audit is addressed in Section 17.3.3.3.3.2, Independent Audit of Fire Protection Program.

B17.3.4.6 Procedure Review Requirements

See Section 17.3.2.14 for required reviews for changes to procedures, tests, and experiments.

B17.3.4.7 Record Retention

A list of typical operational phase QA Records is included in 17.3.2.15.

Attachment C, Robinson Specific QAPD

Information presented in this attachment is specific to Robinson and was contained in the UFSAR prior to Amendment 41.

Where a section contains no descriptive information beyond that in the generic text in the body of the document, a statement is made to that effect and no content is included. See C17.3.1.2, Organization for example.

C17. QUALITY ASSURANCE

C17.1 QA DURING DESIGN AND CONSTRUCTION

See Robinson UFSAR Chapter 17 for historic information from the description of the QA Program for design and construction.

C17.2 OPERATIONAL QA

Deleted

(NOTE: In April 1995, NRC approved the reformatting of the description of the Robinson QA Program to follow Standard Revision Plan Section 17.3, replacing the content of 17.2.)

C17.3 QUALITY ASSURANCE PROGRAM (QAP) DESCRIPTION

INTRODUCTION

This content is not addressed in SRP Section 17.3; therefore, the Robinson description of the QA Program did not include this section.

DEFINITIONS

There are no Robinson specific definitions.

EXPLANATION OF "QUALITY ASSURANCE"

There is no Robinson specific content.

QA STANDARDS AND GUIDES

Table C17-1 and C17-2 address QAP conformance to the referenced regulatory and program guidance in NUREG-0800 Section 17.3.

The content of Table C17-1 was transferred from Section 1.8 of the Robinson UFSAR. Changes to the content of Table C17-1 are controlled in accordance with 10 CFR 50.54(a). Subsequent changes to the QAP are incorporated in this document as identified in Section 17.3.1.7.

Table C17-2 addresses additional Regulatory Guides that relate to implementation of the QAP but the implementation is site specific and controlled with the Robinson UFSAR in accordance with 10 CFR 50.59.

Table C17-1. Conformance with QA Regulatory Guides and Industry Standards

Generic Exception:

Table C17-1 addresses Robinson's Conformance of the Quality Assurance Program to certain NRC Regulatory Guides. In so doing, specific editions of industry standards are identified for compliance with exceptions and alternatives. Those identified standards include references to other industry standards for activities including, but not limited to; design, fabrication, inspection, and testing. Those included reference industry standards are considered to be guidance documents for details of how activities may be accomplished. The actual standard to be used in such cases is controlled by each station's current licensing and design bases.

The content of Table C17-1 was transferred from H. B. Robinson (RNP) UFSAR Section 1.8. As identified therein, Regulatory Guides (originally called Safety Guides) have been published beginning in late 1970. Since H. B. Robinson (RNP) was licensed for operation prior to that time, they were not addressed. Applicable QA Regulatory Guides which have been addressed during the operating phase are discussed below.

Regulatory Guide 1.28, Quality Assurance Program Requirements (Design and Construction) (Rev. 0)
ANSI Standard N45.2-1971, Quality Assurance Requirements for Nuclear Power Plants
This guide and the standard it endorses have been superseded for operations activities by Regulatory Guide 1.33 and ANSI N18.7-1976 which it endorses. The Operational Quality Assurance Program complies with Regulatory Guide 1.33 and ANSI N18.7-1976 as stipulated in Appendix A to that program; therefore, Regulatory Guide 1.28 (Safety Guide 28) and ANSI N45.2-1971 which it endorses are not considered necessary and are not included as part of the program.

Regulatory Guide 1.30, Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electrical Equipment (Revision 0) (August, 1972)
ANSI standard N45.2.4-1972, (IEEE-336-1971), Installation, Inspection, and Testing Requirements for Instrumentation and Electrical Equipment During the Construction of Nuclear Power Generating Stations
RNP shall comply with the provisions of Regulatory Guide 1.30, August 1972 and ANSI N45.2.4-1972 with the following exceptions:
The installation, inspection, and testing of nuclear power plant instrumentation and electrical equipment at RNP will be in accordance with the applicable requirements of ANSI N45.2.4-1972 with the following exceptions: a) Section 1.4 titled Definitions: Definitions in this standard which are not included in ANSI N45.2.10 will be used; definitions which are included in ANSI N45.2.10 will be used as clarified in RNP's commitment to Regulatory Guide 1.74. b) Section 1.5 titled Referenced Documents: RNP's commitment to other documents referenced in this standard shall be as stated in our commitment to that document. c) Section 2.5 titled Measuring and Test Equipment: RNP will implement the applicable portions of this Section as follows: The status of portable items of measuring and test equipment and reference standard shall be identified by use of tags, stickers, labels, routing cards, computer programs, or other suitable means for the date recalibration is due or the frequency of recalibration. These items are in a calibration program which requires recalibration on a specified frequency or, in certain cases, prior to use.

Table C17-1. Conformance with QA Regulatory Guides and Industry Standards (Continued)

Regulatory Guide 1.30, Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electrical Equipment (Revision 0) (August, 1972)
ANSI standard N45.2.4-1972, (IEEE-336-1971), Installation, Inspection, and Testing Requirements for Instrumentation and Electrical Equipment During the Construction of Nuclear Power Generating Stations
RNP shall comply with the provisions of Regulatory Guide 1.30, August 1972 and ANSI N45.2.4-1972 with the following exceptions:

Instrumentation and electrical equipment in the categories listed below shall be in a calibration program. This program provides, by the use of status cards, computer schedules, or tags, for the date that recalibration is due and indicates the status of calibration. The identity of person(s), performing calibration is provided on the calibration documents.

1) Instruments installed as listed in the RNP Technical Specifications
2) Installed instrumentation used to verify RNP Technical Specification parameters, and
3) Installed safety-related instruments and electrical equipment that provide an active function during operation or during shutdown; i.e., not a device being designated safety-related solely because the instrument is an integral part of a pressure retaining boundary.

d) Section 7 titled Data Analysis and Evaluation states in part, "Procedures shall be established for processing inspection and test data and their analysis and evaluation." At RNP, data processing procedures per se have not been developed; instead, test data are recorded, processed, and analyzed in accordance with procedures and instructions in appropriate functional areas; e.g., maintenance, startup.

Regulatory Guide 1.33, Quality Assurance Program Requirements (Operation) Revision 2, February 1978
ANSI Standard N18.7-1976, Administrative Controls and Quality Assurance Requirements for the Operational Phase of Nuclear Power Plants
Comply with the provisions of Regulatory Guide 1.33, Rev. 2 February 1978, and the requirements and recommendations for administrative controls described in ANSI N18.7-1976, except as stated below:

1. Exception to Paragraph C.3 of Regulatory Guide 1.33 and ANSI N18.7-1976 Paragraph 4.3: Independent Review Program requirements are replaced by Section 17.3.3.2, Independent Review. This exception uses NRC Safety Evaluation dated January 13, 2005 to Nuclear Management Company (ADAMS ML050210276).
2. In lieu of the audit program provisions contained in Regulatory Position C.4 of Regulatory Guide 1.33, audits of facility activities will be conducted in accordance with Section 17.3.3.3.3.
3. Paragraph 4.5 - Written audit reports are not formally reviewed as part of the Independent Review function.
4. Paragraph 4.5 - The CNO will assure that an independent assessment of the overall Nuclear Oversight program is conducted at least once every 24 months. Results of the independent assessment will be reported directly to the CNO and entered into the Corrective Action Program for resolution. (For scheduling consistency, the exceptions included in paragraph 5 of this section will be used as clarification for scheduling this independent assessment).
5. Paragraph 4.5, Audit Program- ANSI N18.7-1976/ANS-3.2, Section 4.5 is implemented with the following clarification: The audits of selected aspects of operational phase activities as identified in Section 17.3.3.3.3, Internal Audit Program, are scheduled based on plant performance and importance to safety but at a frequency not to exceed twenty-four months with extensions as allowed in Section 17.3.3.3.7, Audit Frequency Extensions.