

RS-19-075
December 5, 2019

10 CFR 50.54(a)(4)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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Braidwood Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456, STN 50-457, and 72-73

Byron Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454, STN 50-455, and 72-68

Calvert Cliffs Nuclear Power Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-53 and DPR-69
NRC Docket Nos. STN 50-317, STN 50-318, and 72-8

Clinton Power Station, Unit 1
Facility Operating License No. NPF-62
NRC Docket No. 50-461 and 72-1046

Dresden Nuclear Power Station, Units 1, 2 and 3
Facility Operating License No. DPR-2
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-010, 50-237, 50-249, and 72-37

James A. FitzPatrick Nuclear Power Plant
Renewed Facility Operating License No. DPR-59
NRC Docket No. 50-333 and 72-12

R.E. Ginna Nuclear Power Plant
Renewed Facility Operating License No. DPR-18
NRC Docket No. 50-244 and 72-67

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373, 50-374, and 72-70

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352, 50-353, and 72-65

Nine Mile Point Nuclear Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-63 and NPF-69
NRC Docket Nos. 50-220, 50-410, and 72-1036

Peach Bottom Atomic Power Station, Units 1, 2 and 3
Facility Operating License No. DPR-12
Renewed Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-171, 50-277, 50-278, and 72-29

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254, 50-265, and 72-53

Subject: Request for Approval of Change to Exelon Generation Company, LLC,
Quality Assurance Topical Report

In accordance with 10 CFR 50.54(a)(4), Exelon Generation Company, LLC (EGC), requests approval of a proposed change to the Quality Assurance Topical Report (QATR). The proposed change is a reduction in commitment, and in accordance with 10 CFR 50.54(a)(4), NRC approval is required prior to implementation. The proposed change modifies the internal audit frequency from 24 months to 36 months. The increased period between audits will be supplemented by an interim analysis of functional area performance. The change is applicable to audits implemented to meet the requirements of 10 CFR 50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," non-safety programs, and programs that do not have a defined audit frequency, as described in the EGC Quality Assurance Program (QAP). The change does not impact audits performed to meet specific regulations (e.g., Physical Security or Emergency Preparedness). These audits will continue to be performed in accordance with the applicable requirements.

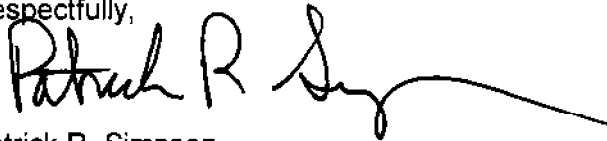
EGC participated in a pre-submittal meeting with the NRC on November 20, 2019. During this meeting the proposed changes were discussed with the NRC.

Attachment 1 to this letter describes the proposed QATR change in more detail, the reason for the change, and the basis for concluding that the revised QATR continues to satisfy the criteria of 10 CFR 50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." Attachment 2 provides the markup of the affected QATR pages.

EGC requests approval of the proposed changes by December 7, 2020. Once approved, the changes shall be implemented within 90 days.

Should you have any questions concerning this request, please contact Mrs. Linda M. Palutsis at (630) 657-2821.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", with a long horizontal flourish extending to the right.

Patrick R. Simpson
Sr. Manager Licensing

Attachments:

1. Evaluation of Proposed Changes
2. Markup of Proposed Change to the Exelon Quality Assurance Topical Report

cc: NRC Regional Administrator, Region I
NRC Regional Administrator, Region III
NRC Senior Resident Inspector – Braidwood Station
NRC Senior Resident Inspector – Byron Station
NRC Senior Resident Inspector – Calvert Cliffs Nuclear Power Plant
NRC Senior Resident Inspector – Clinton Power Station
NRC Senior Resident Inspector – Dresden Nuclear Power Station
NRC Senior Resident Inspector – James A. FitzPatrick Nuclear Power Plant
NRC Senior Resident Inspector – R.E. Ginna Nuclear Power Plant
NRC Senior Resident Inspector – LaSalle County Station
NRC Senior Resident Inspector – Limerick Generating Station
NRC Senior Resident Inspector – Nine Mile Point Nuclear Station
NRC Senior Resident Inspector – Peach Bottom Atomic Power Station
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

ATTACHMENT 1

Evaluation of Proposed Changes

Introduction

The Exelon Generation Company, LLC (EGC) Quality Assurance Topical Report (QATR) ensures conformance to 10 CFR 50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." In accordance with 10 CFR 50.54(a)(4), EGC requests approval of a proposed change to the QATR. The proposed change modifies the internal audit frequency from 24 months to 36 months. The increase period between audits will be supplemented by an interim analysis of functional area performance. The change is applicable to audits implemented to meet the requirements of 10 CFR 50 Appendix B, "Quality Assurance Criteria for Nuclear Power plants and Fuel Reprocessing Plants," non-safety programs, and programs that do not have a defined audit frequency, as described in the EGC Quality Assurance Program (QAP). The proposed change is a reduction in commitment and, therefore, NRC approval is required prior to implementation.

Background

The EGC QAP complies with administrative controls and quality assurance requirements for performance of internal audits established by the American National Standard Institute (ANSI) and the American Nuclear Society (ANS) standards. The EGC QATR reflects commitment to the applicable ANSI/ANS standards and requires that internal audits be performed every 24 months.

Pre-Submittal Meeting

EGC participated in a pre-submittal meeting with the NRC on November 20, 2019. During this meeting the proposed changes were discussed with the NRC. During the meeting EGC clarified that change in the audit frequency for decommissioned units would apply only to Peach Bottom Atomic Power Station, Unit 1, and Dresden Nuclear Power Station, Unit 1, since these permanently shutdown reactors are under the same QAP as the co-located operating units. The proposed changes would not impact the Three Mile Island Nuclear Station, Unit 1, QAP. The audit interval extension would apply to EGC's independent spent fuel storage installations (ISFSI), including Calvert Cliffs. The ISFSI at Calvert Cliffs has a specific-license, whereas the other EGC sites have generally licensed ISFSIs. The Calvert Cliffs ISFSI Final Safety Analysis Report (FSAR) quality assurance chapter references the EGC QAP. Thus, there are no differences between the QAP requirements for the generally licensed ISFSI and the Calvert Cliffs ISFSI.

Proposed Change

EGC is requesting NRC approval to change the internal audit frequency from 24 months to 36 months. Currently QATR Chapter 18, "Audits," requires the following: "...internal audit program is conducted on a performance driven frequency that is commensurate with the status and importance of the activity to be completed but does not exceed 24 months. Internal audit frequencies required by regulation that are different than the 24-month period are indicated within Appendix B." This proposed change replaces the 24-month frequency requirement with a

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36-month frequency requirement. The 25% grace period is maintained ensuring that the period between audit performance will not exceed 45 months.

Chapter 18 is also revised to require an evaluation once per calendar year to determine the need for additional audit activities. Results of the evaluation will be assessed and, when necessary, a review of the identified areas of performance weakness will be planned at the earliest possible opportunity.

The proposed change in internal audit frequency is a deviation from EGC QATR commitments to ANSI and ANS standards (References 1, 2, and 3), which state that audits of selected aspects of plant operation shall be performed with a frequency commensurate with their safety significance and in such a manner as to assure that an audit of safety-related activities are completed within a period of 24 months. It also deviates from Regulatory Guide 1.189, "Fire Protection for Nuclear Power Plants," which provides guidance for performance of annual, biennial, and triennial audits (Reference 4). This is a reduction in commitment pursuant to 10 CFR 50.54(a)(4).

The specific audit topics proposed for the frequency change are:

- Chemistry
- Engineering Design Control
- Engineering Programs
- Maintenance
- Nuclear Fuels
- Procurement / Materials Management
- Operations
- Quality Assurance Functions
- Fire Protection
- Station Blackout
- Radiation Protection
- Decommissioned units (applicable to permanently shutdown units not under the control of an NRC approved decommissioning plan)
- Training
- Radiological Environmental monitoring Program
- Offsite Dose Calculation Manual
- Process Control
- Non-radiological Environmental Monitoring
- Spent Fuel Storage Installations
- Plant Operation Review Committee
- Technical specifications and other license conditions

In addition, some administrative changes are being included in the markup of Chapter 18 for clarity (Attachment 2). These changes are administrative in nature since the vendor audit frequency will not change, but the wording will be revised to align with the QAP change being proposed. These administrative changes have been evaluated and were determined to not require prior NRC approval per 10 CFR 50.54, since they do not reduce the commitments in the program description as accepted by the NRC.

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Justification for Change

The proposed change does not represent a reduction in effectiveness or compliance with 10 CFR 50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants." A comprehensive system of planned and periodic audits will continue to be performed by independent trained personnel using written procedures to verify compliance with all aspects of the QAP. The internal audit program will continue to be conducted on a performance driven frequency that is commensurate with the status and importance of the activity to be completed. Performance of functional area and vendor audits will continue to determine effectiveness of the program.

The proposed frequency change supplemented by evaluation is similar to audit requirements outlined in ASME NQA-1-2015, "Quality Assurance for Nuclear Facility Applications," that was endorsed by Regulatory Guide 1.28, "Quality Assurance Program Criteria (Design and Construction)," Revision 5. This revision of NQA-1, Requirement 18, "Audits," Section 201.2, "Nuclear Facilities After Placing the Facility into Operation," references extending the 2-year internal audit interval to 3 years, not to exceed 4 years with performance of an annual evaluation.

Also, the proposed changes are similar to ANSI/ANS 3.2-2012, "Managerial, Administrative and Quality Assurance Controls for the Operational Phase of Nuclear Power Plants," that was endorsed by Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)," Revision 3. This quality standard also, provides guidance in section 3.18.1.1, "Regularly Scheduled Audits," for extending the 2-year frequency not to exceed 4 years with performance of an annual evaluation. In addition, the proposed 36-month audit frequency is consistent with external audit requirements for audit of suppliers and with NRC triennial inspections.

It should be noted that EGC is not adopting NQA-1-2015 or ANSI/ANS 3.2-2012 as part of this proposed change, but is only citing those standards to show that the proposed frequencies are similar to other NRC endorsed standards. The variations between the proposed changes and NRC endorsed quality standards include setting the audit frequency to 36 months with 25% grace versus the 2-year frequency with a 1-year extension(s) not to exceed 4 years described in NQA-1-2015 and ANSI/ANS 3.2-2012 standards. The proposed evaluation will focus on identifying areas that require audit activity prior to the next scheduled audit, rather than justifying extension.

Functional area audits and evaluations would be separated into three cycles covering a period of 36 months. Each cycle includes a set of audits and evaluations. Results of the completed audits will be reviewed to determine if additional audit activities are necessary prior to their next scheduled performance. Each functional audit area will receive an additional performance analysis (evaluation) within 2 years of the last performed audit based on internal and external data; functional area changes in responsibility, resources, or management; and consideration of the impacts, as applicable, to determine if additional audit activities are necessary prior to the 36-month scheduled performance. These evaluations will meet the intent of the annual evaluation described in NRC endorsed quality standards by ensuring action by the audit organization upon evaluation of adverse performance trends should they exist prior to the next scheduled audit activity. The resulting action will be based on the problem identified and may include one or more of a variety of audit tools, such as simple observations, follow-up reviews,

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limited scope audits up to a full audit of the functional area.

The change in frequency for Fire Protection Program audits do not reduce the effectiveness of the Fire Protection QAP. Audits will be performed on a 36-month frequency and will continue to be comprehensive, risk and performance-based reviews to determine effective implementation of the site and fleet Fire Protection Program. Audits include, but are not limited to, evaluation of organization, personnel, training, program implementation and equipment. Audits will continue to be conducted by an independent Fire Protection Engineer. The audits will be supplemented with an evaluation of the Fire Protection Program implementation activities between scheduled audits.

In aggregate, these changes will continue to meet the fundamental requirements of an internal audit program as described in quality standards endorsed by the NRC and will continue to provide proper coverage of QAP activities. The changes will allow audits to be scheduled at a frequency commensurate with the status and importance of the activity. Evaluations of performance will be used to effectively focus audit resources in areas indicating gaps in QAP implementation.

This change request is written specifically for the EGC QAP, which is based on NQA-1-1994, "Quality Assurance Program Requirement for Nuclear Facilities" (Reference 5). The details of the proposal were developed with industry input through the Nuclear Quality Leadership (NQML) forum. If approved for Exelon, the industry will be able to implement this alternate approach through changes to their QAP under 10 CFR 50.54(a), regardless of the specific version of quality standards that form the basis of their QAP. EGC requests that NRC approval documentation acknowledges this approach for industry reference.

Precedent

None.

References

1. ANSI N18.7–1972, "Administrative Controls for Nuclear Power Plants (Peach Bottom)"
2. ANSI N18.7–1976/ANS 3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants (Limerick, Fitzpatrick, Clinton)"
3. ANSI/ANS 3.2–1988, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants (Braidwood, Byron, Dresden, LaSalle and Quad Cities)"
4. Regulatory Guide 1.189, "Fire Protection for Nuclear Power Plants"
5. NQA-1-1994, "Quality Assurance Program Requirement for Nuclear Facilities"

ATTACHMENT 2

Markup of Proposed Changes to the Exelon Quality Assurance Topical Report

18.1. SCOPE

A documented, comprehensive system consisting of regulatory audits of the Company and its vendors are conducted to verify QAP compliance, adequacy, and effectiveness. Audits are conducted in accordance with written procedures or checklists. Audits are performed to the requirements of ASME NQA-1 to evaluate the audited organization and to assure completion of required corrective actions, commitments, or improvements and determine effectiveness in meeting program objectives.

18.2. REQUIREMENTS

18.2.1. General

18.2.1.1 Scheduling

~~The internal audit program is conducted on a performance driven frequency that is commensurate with the status and importance of the activity to be completed but does not exceed 24 months. Internal audit frequencies required by regulation that are different than the 24 month period are indicated within Appendix B, Audit Frequency. Audit frequencies are determined based on a consideration of the risk and consequences with respect to the activities audited~~

The internal audit program is conducted on a performance driven frequency that is commensurate with the status and importance of the activity to be completed. Audits governed by regulations will be performed on a frequency specified by the regulation. All other audits are nominally scheduled at a 36-month frequency. Audits shall be performed at the intervals designated in Appendix B, Audit Frequency. Schedules are based on the month in which the audit starts.

An evaluation will be performed once per calendar year, to determine the need for additional audit activities. When determined necessary, an additional audit activity will be performed within a timeframe established by the evaluation.

Audits or surveys of vendors and their sub-tier suppliers are performed to a pre-established schedule. Audits are nominally scheduled at a 36-month frequency. Documented supplier performance monitoring is performed in accordance with approved procedures as an acceptable alternate to the performance of the annual evaluation of suppliers. The management position responsible for audits and programs or designee, shall review and approve the audit / survey schedule and checklists, and sign reports. Schedules are

reviewed semi-annually and revised accordingly to assure that suppliers are audited or surveyed as required.

Audits may be extended beyond their originally scheduled due date based on the following criteria:

~~A. Audits shall be performed at the intervals designated in Appendix B, Audit Frequency. Schedules are based on the month in which the audit starts.~~

B. For internal and vendor audits or surveys, a maximum extension not to exceed 25 percent of the audit interval is allowed. Unless extension is allowed by regulations, regulatory required audits will be performed on a frequency not to exceed 24 months.

~~CB. For supplier audits and evaluation, a maximum extension not to exceed 25 percent of the audit interval is allowed. That is to say that, for audits on a 24-month frequency, the maximum time between specific audits does not exceed 30 months. Likewise, audits on an annual (12-month) frequency do not extend beyond 15 months. Audits of Emergency Preparedness, Cyber Security, and Security are not subject to the extension and will be performed on a frequency not to exceed 12 months (or not to exceed 24 months if performed on a 24-month frequency).~~

Administrative changes included for clarity. See Attachment 1 page 2 for discussion.

~~D.~~ When an audit interval extension greater than one month is used, the next audit for that ~~particular~~ audit area is scheduled from the original anniversary month rather than from the month of the extended audit.

Items B applies to supplier audits and evaluations except that a total combined interval for any three consecutive inspection or audit intervals does not exceed 3.25 times the specified inspection or audit interval.

18.2.1.2. Preparation

A documented plan or an agenda identifies the audit scope, requirements, personnel, activities to be evaluated, organizations to be notified, applicable documents, and schedule. An approved checklist or procedure for each scheduled audit identifies the requirements of the area or items to be evaluated. Audit plans, agendas, checklists, and procedures as applicable are prepared in advance under the direction of an Audit Team Leader.

18.2.1.3. Personnel

Experienced and qualified personnel perform audits and are familiar with written procedures, standards, and processes applicable to the area being

evaluated. Audit personnel shall have sufficient authority and organizational freedom to make the audit process meaningful and effective and shall not have direct responsibilities in the areas to be audited. They shall have access to the plant records necessary to fulfill their function.

The Audit Team Leader shall organize and direct audits and ensure the team collectively has the required experience or training for the activities to be evaluated. Technical Specialists may supplement the team to provide additional experience and competence.

18.2.1.4. Performance

Audits are initiated early to assure effective quality assurance during design, procurement, manufacturing, construction, installation, inspection, testing, and operations. Additional unscheduled audits may also be performed at various stages of activities, based on the nature and safety significance of the work being done; to verify continued adherence to and effectiveness of the quality systems. Objective evidence shall be examined to the extent necessary to determine that a quality program is being effectively implemented.

18.2.1.5. Reporting and Follow-up

An audit report includes the description of the audit scope, identification of the team and personnel contacted during audit activities, a summary of results (including a statement on effectiveness of the QAP elements), and a description of each finding. The ATL shall sign the audit report for which he or she is responsible.

Audit results are documented and distributed to the management position responsible for NOS, and to the appropriate managerial level of the organization having responsibility for the area or activity audited. Findings or deficiencies requiring prompt corrective action are reported immediately to the management of the audited organization.

Findings, deficiencies, and recommendations of each audit shall be reported to appropriate site management and the management position responsible for NOS. All findings of noncompliance with NRC requirements, and any significant nuclear safety or quality issues requiring escalated action, will be directed through the management position responsible for NOS to the President and CNO in accordance with procedural requirements.

Responsible management shall take the necessary actions to correct findings identified in the audit. They will identify the corrective action to be taken, actions that will prevent recurrence as applicable, and a schedule for implementing these actions. Responses to audit findings are reviewed for adequacy.

Follow-up verification of the completion of scheduled corrective action commitments are performed by NOS to assure findings or adverse conditions are corrected in accordance with procedural requirements. Follow-up action of previous deficient areas or adverse conditions (including re-audit) is taken to verify that corrective action has been completed, is effective, implementation continues, and is properly documented, when indicated.

18.2.1.6. Records

Audit results are documented, and reports are generated and retained as applicable. Associated documentation is on file at the appropriate location. Personnel qualification records for audit team members are established, maintained, and reviewed as required.

18.2.2. Vendor Audits

~~Audits or surveys of vendors and their sub-tier suppliers are performed to a pre-established schedule. Audits are performed on a triennial basis. Documented supplier performance monitoring is performed in accordance with approved procedures as an acceptable alternate to the performance of the annual evaluation of suppliers. The management position responsible for audits and programs or designee, shall review and approve the audit/survey schedule and checklists, and sign reports. Schedules are reviewed semi-annually and revised accordingly to assure that suppliers are audited, or surveyed as required.~~

Audit program requirements are imposed on suppliers by appropriate contract or procurement documents. The Company's active participation in nuclear industry audits provides an alternative means to fulfilling its responsibility for examining supplier activities.

18.2.3. Independent Management Audit

A periodic audit ~~(not to exceed 24 months)~~ of the status and adequacy of the QAP is performed by an independent organization to assure that audits are being accomplished to program requirements. In addition, this will include an evaluation of the independent review as defined in Chapter 2, section 2.2.6. The management position responsible for NOS submits the results of this

audit to the President and CNO. The periodic audit will include a sampling of sites and are nominally scheduled at a 36-month frequency with a 25 percent grace allowed. A self-assessment will be performed once per calendar year to evaluate the need for additional audit activities.

Internal audits shall be conducted on a performance driven frequency, ~~not to exceed 24 months or at the frequencies in calendar months as~~ indicated below, in accordance with the Company's QAP. Audits shall include the following safety-related functions as applicable:

AUDIT	FREQUENCY
a. The conformance of unit operation to provisions contained within the technical specifications and applicable license conditions.	24-36 Months
b. The adherence to procedures, training, and qualification of the station staff.	24-36 Months
c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, components, or method of operation that affect nuclear safety (CAP).	24-36 Months
d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix B of 10 CFR 50. <ul style="list-style-type: none"> • Chemistry • Engineering – Design Control, • Engineering – Programs • Procurement / Materials Management • Maintenance • Nuclear Fuels • Operations • Quality Assurance Functions (internal and vendor audit \ assessment activities are evaluated by NIEP.) 	24-36 Months
e. The fire protection programmatic controls including the implementing procedures (by qualified Nuclear Oversight personnel).	24-36 Months
f. The fire protection equipment and program implementation, including loss prevention, utilizing either a qualified offsite licensee fire protection engineer or an outside, independent fire protection consultant. An outside, independent fire protection consultant shall be used. at least every second year.	24-36 Months
g. The Radiological Environmental Monitoring Program (REMP) and its results.	24-36 Months
h. The Offsite Dose Calculation Manual (ODCM) and implementing procedures.	24-36 Months

AUDIT	FREQUENCY
i. The Process Control Program (PCP) and implementing procedures for the solidification of radioactive wastes.	24-36 Months
j. The non-radiological environmental monitoring activities required by the Appendix B of the Facility Operating Licenses. (Note: Dresden, Ginna, and TMI do not have an Environmental Appendix to their Facility Operating Licenses.)	24-36 Months
k. Randomly selected procedures to ensure that the programmatic control processes used to assure that procedures are technically and administratively correct prior to use are resulting in timely and accurate procedure revisions.	24-36 Months
l. The Security Plan and implementing procedures per 10 CFR 73.55. Minimally review each element of the physical protection program at least every 24 months. Including: (i) Within 12 months following initial implementation of the physical protection program or a change to personnel, procedures, equipment, or facilities that potentially could adversely affect security. (ii) As necessary based upon site-specific analyses, assessments, or other performance indicators. (Reference 10 CFR 73.55 and 10 CFR 50.54(p)(3)(ii))	24 Months
m. The Emergency Plan and implementing procedures (Reference 10 CFR 50.54(t)(1)(ii) for lesser frequency requirements).	12-24 Months
n. Deleted	
o. The conformance of Spent Fuel Storage Installation operation to provisions contained within the technical specifications and applicable license conditions and results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, components, or methods of operation affecting nuclear safety (Reference NUREG / CR-6407, and 10 CFR 72, Subpart G) (ISFSI sites only).	24-36 Months
p. Access Authorization Program (10CFR73.56) (Initial Audit frequency is 12 months and 24 months thereafter) (Ref. RIS 2005-14)	24 Months

AUDIT	FREQUENCY
q. Personnel Access Data System (PADS) (10 CFR 73.56) (Initial Audit frequency is 12 months and 24 months thereafter) (Ref RIS 2005-14)	24 Months
r. Deleted	
s. Fitness For Duty (FFD) Program (10 CFR 26.41)	24 Months
t. Station Black Out (Reg. Guide 1.155, Appendix A) Audits should be conducted and documented to verify compliance with design and procurement documents, instructions, procedures, drawings, and inspection and test activities developed to comply with 10 CFR 50.63. (Calvert Cliffs, Dresden, FitzPatrick, LaSalle, Limerick, Nine Mile Point Units 1 and 2, Oyster Creek, Quad Cities, and Three Mile Island Only)	24-36 Months
u. Radiation Protection activities as defined in 10 CFR 20.	24-36 Months
v. Plant Operations Review Committee (PORC)	24-36 Months
w. Decommissioned Units	24-36 Months
x. Cyber Security Program (10 CFR 73.55(m)). (Initial Audit frequency is 12 months and 24 months thereafter)	24 Months