



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

CNL-20-039

April 30, 2020

10 CFR 50.54
10 CFR 50.55
10 CFR 50.71

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Bellefonte Nuclear Plant, Units 1 and 2
Construction Permit Nos. CPPR-122 and CPPR-123
NRC Docket Nos. 50-438 and 50-439

Browns Ferry Nuclear Plant, Units 1, 2, and 3
Renewed Facility Operating License Nos. DPR-33, DPR-52, and DPR-68
NRC Docket Nos. 50-259, 50-260, 50-296, and 72-052

Clinch River Nuclear Site
NRC Docket No. 52-047

Sequoyah Nuclear Plant, Units 1 and 2
Renewed Facility Operating License Nos. DPR-77 and DPR-79
NRC Docket Nos. 50-327, 50-328, and 72-034

Watts Bar Nuclear Plant, Unit 1 and 2
Facility Operating License Nos. NPF-90 and NPF-96
NRC Docket Nos. 50-390, 50-391, and 72-1048

Subject: **Nuclear Quality Assurance Plan, TVA-NQA-PLN89-A, Revision 38**

This letter transmits the Tennessee Valley Authority (TVA) Nuclear Quality Assurance Plan (NQAP), Revision 38. The enclosures to this letter fulfill the requirements of Title 10, *Code of Federal Regulations* (10 CFR) 50.54(a)(3) regarding changes to the NQAP, 10 CFR 50.71(e) regarding the licensee annual submittal requirement, and 10 CFR 50.55(f)(3) regarding providing changes to the NQAP within 90 days for revisions involving construction permit holders.

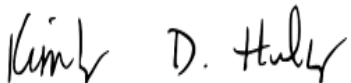
The effective date for Revision 38 of the NQAP was April 17, 2020. In order to satisfy the 90-day criterion for Revision 38, the due date for this submittal is July 16, 2020. However, the due date based on the annual submittal requirement is May 8, 2020.

Enclosure 1 provides a description of the changes in Revision 38 of the NQAP and the conclusion that the changes are not a reduction in commitment. Enclosure 2 to this letter provides Revision 38 of the TVA NQAP.

There are no new regulatory commitments in this letter. Please address any questions regarding this submittal to Robert J. Krigelman, Senior Manager, Corporate Quality Assurance, at (423) 751-8030.

I certify that I am duly authorized by TVA, and that, to the best of my knowledge and belief, the information contained herein accurately presents changes necessary to reflect information and analyses submitted to the Commission or prepared pursuant to Commission requirements that have been made since the May 8, 2019 (ML19129A258) submittal of the NQAP.

Respectfully,

 for

James T. Polickoski
Director, Nuclear Regulatory Affairs

Enclosures:

1. Summary of Changes to the TVA Nuclear Quality Assurance Plan
TVA-NQA-PLN89-A, Revision 38
2. TVA Nuclear Quality Assurance Plan TVA-NQA-PLN89-A, Revision 38

cc: (with Enclosures):

NRC Director, Office of Nuclear Reactor Regulation
NRC Project Manager - Browns Ferry Nuclear Plant
NRC Project Manager - Sequoyah Nuclear Plant
NRC Project Manager - Watts Bar Nuclear Plant
NRC Regional Administrator - Region II
NRC Senior Resident Inspector - Browns Ferry Nuclear Plant
NRC Senior Resident Inspector - Sequoyah Nuclear Plant
NRC Senior Resident Inspector - Watts Bar Nuclear Plant
NRC Project Manager, Division of Licensing, Siting, and Environmental Analysis
NRC Director, Division of Licensing, Siting, and Environmental Analysis
NRC Branch Chief, Division of Licensing, Siting, and Environmental Analysis
NRC Project Manager, Division of Licensing, Siting, and Environmental Analysis
U.S. Army Corps of Engineers Regulatory Specialist, Eastern Regulatory Field Office,
Nashville District

ENCLOSURE 1

Summary of Changes to the TVA Nuclear Quality Assurance Plan (NQAP),
TVA-NQA-PLN89-A, Revision 38

Change No.	Changed Section	Description of Change
1	2.0 Applicability	Recognized Non-nuclear TVA organizations performing work for TVA Nuclear may have quality requirements defined in procurement documents. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
2	4.1.6 Procurement	Recognized responsibility for procurement of material belongs to Supply Chain organization, not Engineering. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
3	5.0 NUCLEAR QA PROGRAM	Recognized Non-nuclear TVA organizations performing work for TVA Nuclear may have quality requirements defined in procurement documents. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
4	12.2.E.5 AUDITING / Program Elements	Revised to allow a maximum internal audit interval extension of 25% interval. Based on NRC SER for SNC QAP revision. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
5	12.2.F.4 AUDITING / Program Elements	Corrected text to align language in Quality Plan with ANSI N45.2.12, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants for the preparation and review of audit reports. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
6	12.2.F.5 AUDITING / Program Elements	Revised to allow a maximum vendor audit interval extension of 25% interval, not to exceed a 3.25 interval for three consecutive audits. Based on NRC SER for SNC QAP revision. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
7	APPENDIX B Regulatory Guide Conformance Status, Table 2, section NRC RG 1.33, exception B.1	Revised language to facilitate the continued use of SRO-equivalent Nuclear Unit Senior Operators (NUSOs) in the approval function for urgent changes, which is consistent with their SRO duties/responsibilities. NUSOs are no longer considered to be "management" as they are now in the Trades and Labor classification and do not perform personnel / performance management, but still retain technical ability and authority. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.

ENCLOSURE 1

Summary of Changes to the TVA Nuclear Quality Assurance Plan (NQAP),

TVA-NQA-PLN89-A, Revision 38

Change No.	Changed Section	Description of Change
8	APPENDIX B Regulatory Guide Conformance Status, Table 2, section NRC RG 1.123, exception C, C.1.a, .2.a, 2.f, 3.a	Aligned NQAP with NRC provisional recognition of ISO/IEC 17025:2005 and :2017 as stated in the April 16, 2019 letter from the NRC, ADAMS Accession No. ML 19056A451. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
9	APPENDIX B Regulatory Guide Conformance Status, Table 2, section NRC RG 1.144, exception D, D.1.a, 2.a, 2.f, 3.a	Aligned NQAP with NRC provisional recognition of ISO/IEC 17025:2005 and :2017 as stated in the April 16, 2019 letter from the NRC, ADAMS Accession No. ML 19056A451. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
10	Appendix I, NQAP Organization Chart	Revised organization chart to reflect the management position responsible for Small Modular Reactor Technology now reports to the management position responsible for nuclear technology innovation. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.
11	Appendix K, Section 2.1	Revised text to reflect the management position responsible for Small Modular Reactor Technology now reports to the management position responsible for nuclear technology innovation. The change was reviewed in accordance with 10 CFR 50.54(a) and caused no reduction in commitments.

ENCLOSURE 2

TVA Nuclear Quality Assurance Plan

TVA-NQA-PLN89-A, Revision 38



**TVA Quality
Assurance
Program**

**Nuclear Quality Assurance Plan
(NQAP)
(Quality Assurance Program
Description)**

**TVA-NQA-PLN89-A
Rev. 0038**

Quality Related ☒ Yes ☐ No

Effective Date 04-17-2020

Responsible Peer Team/Working Group: Quality Assurance

Approved by: _____ Ronald Detwiler _____ 04/17/2020
General Manager, Quality Assurance Date

TVA Quality Assurance Program	Nuclear Quality Assurance Plan (NQAP) (Quality Assurance Program Description)	TVA-NQA-PLN89-A Rev. 0038 Page 2 of 152
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Revision or Change Number	Effective Date	Affected Page Numbers	Description of Revision/Change
0	Refer to Appendix A	All	Initial Issue
1	No later than 2/25/91	All	First annual update
2	No later than 4/17/92	All	Second annual update
3	No later than 4/19/93	All	Third annual update
4	No later than 4/19/94	All	Fourth annual update
5	No later than 6/15/95 for BLN, BFN and SQN. By fuel load for WBN.	All	Fifth annual update
			Note: Section 12.2.E.2 is effective after NRC approval.
6	Upon issuance for BLN, BFN, and SQN. By fuel load for WBN.	4, 15, 16, 17, 22, 23, 25, 65-71, 77, 78, 79, 92, 103, 110, 111	Revised to incorporate subject matter relocated from WBN Unit 1 Technical Specifications, Chapter 5.0, Administrative Controls.
7	Subsequent to NRC's acceptance of corresponding Technical Specification changes. Effective 7/27/98	2, 6, 9, 11-18, 20-26, 30, 31, 33, 34, 39, 42, 45, 46, 49, 51, 52, 55, 59, 60, 62, 64, 65, 67, 69-79, 86, 87, 89, 92-94, 97, 111, 115, 119-121, 123, 126, 133-136	Revised to incorporate subject matter relocated from SQN and BFN Technical Specifications, Chapter 6.0, Administrative Controls; and other changes as indicated by revision bars.
8	9/11/98	3-7, 8-29, 32-35, 37-43, 45, 48, 50, 51, 53-59, 61, 63, 64, 66, 67, 87, 92, 94, 95, 100, 102, 105, 106, 108, 109	Revised to update organization charts in Appendix H, and position titles and functional responsibilities throughout the Plan. Removed redundant information from Section 4.1 that is addressed in the Responsibilities sections throughout the Plan. Revised Section 9.9 as a step in standardizing Plant Reviews.

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8-A1	5/25/99	2, 5, 7, 10, 13, 14, 20, 26, 34, 35, 37, 38, 50, 55, 63, 108, 109	Addendum No. 1 adds responsibilities for the Procurement organization and the Nuclear Support organization, changes the reporting relationship of Corporate Licensing, and clarifies a function of Qualified Reviewers.
9	1/31/2000 RPL 12/3/99	2, 3, 7, 10, 13, 14, 20, 24, 26, 35, 38, 39, 51, 56, 65, 70, 84, 92, 96, 109, 110	Incorporated changes made in Revision 8, Addendum No. 1, and other changes as indicated by revision bars. Revised to add responsibilities associated with independent technical reviews in Sections 4.1.3.D and 4.1.4.A. Added reference to 10 CFR 72 in Sections 5.1.A, 5.4.B, and 14.1, and Appendix B. Changed effective date from 12/13/99 to 1/31/2000 to accommodate impacted procedure revisions.
9-A1	1/31/2000	2, 5, 8, 11, 18, 22, 23, 70	Addendum No. 1 clarifies that the ASME III QAM is currently inactive.
10	9/8/00	2, 3, 55-59, 107, 109	Incorporated changes made in Revision 9, Addendum No. 1, and other changes as indicated by revision bars. Standardized the requirements for plant reviews and the Plant Operations Review Committees (PORCs) in Section 9.9. Revised title in Appendix H.
11	6/29/01	1-4, 10, 13, 15-18, 55, 57, 83, 84, 98, 106, 107	Added reference to self-evaluation in Section 3.3.4. Updated to comply with 10 CFR 50.59 rule changes in Sections 4.1.3.B.5.b, 9.9.2.A.5, and 9.9.2.B.7.i. Changed reference to "the quarterly trend report" in Section 4.1.4.A. to "a performance report at least quarterly." Updated the description of functions performed by the Nuclear Assurance organization in Section 4.1.6 to consolidate overlapping functions. Added reference to ANSI/ASNT CP-189-1991 in Appendix B, Table 1, page 8 to comply with 10 CFR 50.55a(b)(a). Revised Site Quality Managers qualification requirements in Section 4.1.6 and Appendix B, Table 2, page 9. Revised commitment to NRC Regulatory Guide 1.146 concerning Lead Auditor qualification consistent with approved NRC safety evaluations (Appendix B, Table 2, page 23). Revised Appendix H org. chart to reflect title change. Deleted the BLN Site Nuclear Assurance and Licensing Manager from Sections 4.1.6.A, 4.1.6.C and the Appendix H Organization Chart.
11-A1	8/20/01	3, 6, 12	Deleted the reference to the Vice President, E&TS, as the Chairman of the Nuclear Safety Review Board.

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11-A2	1/18/02	3, 6, 63	Revise the annual Fire Protection audit frequency to "a maximum interval of 24 months."
12	08/19/02	1-4, 7, 21, 57, 59, 65, 69, 77, 93, 95-98, 103, 108	Incorporate Addendum Nos. 1 and 2 to Revision 11. Added reference to 10 CFR 72 in Sections 5.1.B, 9.9.2.A.5, 9.9.2.B.7, 12.2.E.4.d, and 14.1. Added 10 CFR 72, Subpart G references to Appendix A matrix. Clarified that Regulatory Guide 1.88 with noted alternatives apply to 10 CFR 72 records in Appendix B, Regulatory Guide Conformance Status. Included the requirement that 10 CFR 72 records must be maintained in duplicate. Update retention times for 10 CFR 50.59 records to agree with 10 CFR 50.59(d) (3) in Appendix B for WBN, SQN, and BFN. Added records and retention time for 10 CFR 72 records to Appendix B for SQN and BFN. Added reference to 10 CFR 72 in Appendix C, Section 4.4. Deleted note on Appendix H, Page 1.
12-A1	06/09/03	4, 7, 17	Added clarification to Section 4.1.6.A
12-A2	06/20/03	4, 7, 17, 18, 20, 108-110	Added reference to BFN Unit 1 Restart organization in Section 4.1.6, new Section 4.1.8, and Appendix H. Added Appendix I, BFN Unit 1 Restart Organizational Matrix.
13	08/27/03	4, 7, 21, 58, 109	Incorporated Addendum Nos. 1 and 2 to Revision 12. Updated Appendix H Organization Chart. Corrected minor format errors.
13-A1	03/12/04	4, 5, 7-9, 15, 23, 26, 56, 69, 70, 72, 76, 84, 94, 97, 98, 102-106, 109	Clarify and enhance ISFSI requirements to implement 10CFR72. (SQN PERs 03-12911 and 12912)
13-A2	04/30/04	4, 7, 16, 17, 110, 111	Moved the reporting relationship of the General Manager, NA (and organization) from a "direct" report of the CNO and Executive Vice President, TVAN, to a direct (hard-line) report to the Vice President, Nuclear Support. The General Manager, NA still retains access and a "dotted-line" reporting channel to the CNO and Executive Vice President, TVAN.
13-A3	6/4/04	1-5, 8, 9, 45, 47, 110	Deleted requirement that the General Manager concur with TVAN Inspector Certifications (Sections 9.1.3.D and 9.3.3.F). Added Appendix F, Deferred Plant Equipment Policy.
14	8/31/04	All	Incorporated Addendum Nos. 1, 2 and 3 from Revision 13.

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14-A1	12/17/04	5, 8, 73, 74	Revised definition of "Independent Spent Fuel Storage Installation (ISFSI)." Added definition of "Greater than Class C Waste (GTCC Waste)."
14-A2	5/17/05	5, 8, 84	Added reference to Reg. Guide 1.189 in Appendix B, Table 1.
15	8/31/05	5, 6, 8, 9, 12, 14, 17, 18, 19, 21, 22, 23, 28, 35, 40, 43, 44, 46, 48, 49, 52, 53, 55, 56, 63, 65, 68, 69, 73, 74, 84, 88, 111, 112, 113	Incorporated Addendum Nos. 1 & 2 from revision 14. Updated organization titles. Updated Appendix H organization charts.
15-A1	7/14/06	5, 8, 12, 18, 19, 20	Clarified Section 3.3.3 concerning assessment of NA performance. Clarified Section 4.1.6.A concerning the NA Organizational Structure. Clarified Section 4.1.6.E concerning reporting responsibility of the Evaluation and Analysis Group. Clarified Section 4.1.6.F.5 concerning evaluation of QA Training.
16	8/31/06	5, 7, 8, 12, 14 -18, 20, 21, 34, 39, 42, 44, 45, 47, 52, 53, 55, 63, 67, 85, 109, 110	Incorporated Addendum No. 15-A1. Updated organization titles. Updated Appendix H organization charts. Corrected minor typographical errors. Transferred responsibility for NSRB support from Nuclear Assurance to Corporate Nuclear Licensing and Industry Affairs.
16-A1	5/8/07	6, 9, 13, 18, 19, 78, 96, 102, 108, 112	Deleted reference to Bellefonte (BLN) in Sections 3.3.3; 4.1.6.F; Appendix C, Section 3.0; and Appendix F due to withdrawal of construction permit. Corrected references in Sections 4.1.7.D; Appendix A; Appendix B, Rag Guide 1.88, WBN QA Records List. Updated Title in Appendix I.
17	08/31/07	6, 7, 9, 10-19, 21-24, 28, 29, 31, 35, 40, 43-46, 48, 51, 53-56, 60, 62, 64, 67, 68, 78, 79, 89, 93, 94, 96, 101-106, 109, 111, 112	Incorporated Addendum No. 16-A1. Updated organization titles. Updated Appendix H organization charts. Deleted reference to Browns Ferry Unit 1 organization. Deleted Appendix I. Added exceptions to Appendix B, Regulatory Guide Conformance Status, NRC Regulatory Guides 1.33, 1.123 and 1.146 concerning Commercial Grade Calibration Services. Revised some responsibilities based on re-organization.

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18	11/30/07	6, 7, 9-13, 16-19, 23, 25-26, 36, 44, 46, 49, 52, 55, 57, 71, 77, 110-113, 115-117	<p>Pointer to a new organization is introduced as a result of an internal re-organization. The Nuclear Generation Development and Construction organization lead by a senior vice president reports to the COO and is at the same management level as the CNO. The WBN 2 specific position of Project Nuclear Assurance Manager is introduced with responsibilities and education and experience requirements specified. This change is like the one done for the recently completed BFN 1 restart. Addressed ASME III reactivation. The ASME III QA manual will be modified to allow the limited scope activities associated with completing the paperwork for work did started but did not complete under our old N stamp. Bechtel will complete the ASME work under their N Stamp. Clarified Inspection Services Organization Manager to indicate they do not apply to WBN 2. The responsibilities for construction completion are contracted to the Engineering Procurement and Contractor (Bechtel). Throughout body of the NQA Plan reassigned responsibility for construction and unlicensed unit activities from the corporate VP Engineering to the VP WBN Unit 2 to be consistent with the internal organizational recognizing NGDC as the group completing construction. Deleted text in Appendix F for deferred equipment policy since it is no longer applicable. Our 120 day letter to the NRC indicated needed equipment will be completely refurbished and no credit is taken for preservation activities. The Appendix was renamed and text added to describe the construction completion organization for TVA and Bechtel. Appendix H organization charts were reworked to reflect the organization changes described in the text of the NQA Plan.</p>
18-A1	09/17/08	7, 10, 17, 113, 115, 116, 117	Changed the reporting relationship for the General Manager, Nuclear Assurance (NA), from a direct report to the Chief Nuclear Officer to a direct report to the General Manager, Nuclear Oversight and Assistance.
18-A2	09/17/08	7, 10, 60	Changed the review requirements for Administrative Procedures - PORC Review is limited to procedures requiring an evaluation per 10 CFR 50.59.

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18-A3	09/30/08	7, 10, 20	In the second sentence of 4.1.7.C.3 add the words "or Alternate Chairman" so the sentence reads "The Chairman or Alternate Chairman, NSRB, is also responsible for ensuring that the QA requirements established by this Plan related to NSRB functions are either included or referenced (as appropriate) in related procedures or instructions."
19	12/04/08	7, 10, 16, 17, 20, 21, 23, 38, 40, 41, 42, 54, 60, 63, 113, 115, 116, 117	Revised Sections 4.1.4 and 4.1.6, Appendix F, and Appendix H (A1), 9.9.2.B.7 (A2), and 4.1.7.C.3 (A3) to incorporate Addendum A1, A2, and A3. Updated organizational titles and charts based on organizational changes. Revised Section 4.1.7.C.3 to change responsibilities from Alternate Chairman, NSRB, to General Manager, Licensing and Performance Improvement.
19-A1	02/06/09	8, 11, 68, 91	Inserted Section 12.2.E.5 to clarify the use of grace periods for internal audits. Revised exceptions to Regulatory Guide 1.33.
20	03/16/09	8, 11, 15-19, 21, 24, 26-27, 31, 37, 45, 48, 54, 57, 58, 69, 91, 105, 115-124	Revised to reflect reinstatement of BLN Construction Permits. Added new Appendix G for Bellefonte. Revised various sections throughout NQA Plan to recognize BLN CP reinstatement. Incorporated revision 19 addendum A1.
21	07/01/09	8, 9, 12, 13, 15, 16, 18, 19, 24, 26, 30, 31, 47, 48, 51, 57, 59, 64, 66, 70, 112-116, 118-120, 123, 125, 126	Revised to reflect the changes of Nuclear Assurance organization to address the construction activities at WBN Unit 2 and BLN Units 1 and 2.
22	10/30/09	8-9, 12, 15, 17-21, 24, 25, 28-33, 37, 42, 44-49, 51, 54, 56, 57, 62, 66, 67, 70, 71, 76, 81, 90, 97, 99, 104, 113-116, 118-120, 122-126	Revised organization titles and responsibilities to reflect the reorganization of the NPG. Add the Radiological Emergency Plan and the Fire Protection Reports to Appendix H for PER 165761. Added a clarification to 5.5 Program Changes.

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23	12/14/09	8, 9, 13, 15-16, 18, 21-24, 39, 42, 43-44, 51, 54, 56-57, 61, 67, 69, 78, 82, 107, 114-115, 119-120, 123-126	1) Revise section 9.1.2 to state that qualification of personnel performing line verification shall be in accordance with Regulatory Guide 1.8 as endorsed in Appendix B of the Plan. 2) Add a definition for Quality Control Inspectors to section 15.0 stating that they are qualified to ANSI N45.2.6-1978. 3) Mark Regulatory Guide 1.8 to be applicable to Inspection and Line Verification in Table 1 of Appendix B. 4) Update position titles. 5) Changed Plan to Program as appropriate to be consistent. (All pages affected.) 6) Removed dotted line relationship between CNO and SENIOR VP NGDC to be consistent with Organizational Topical Report.
24	08/31/10	All	This document was converted from Word 95 to Word 2002 using Rev. 20. The document has been upgraded to Word 2007 and Rev 21, 22, and 23 changes have been incorporated. The purpose of this revision is to reflect organization as described by Organization Effectiveness Initiative as it relates to Bellefonte Units 1 & 2 and NGDC Organization. Additionally NPG position titles below Executive Vice President, and CNO have been removed and the positions are described as "management position responsible for." Removed the organizations charts for NPG organization as described by NUREG 0800 Chapter 17.3. Also modified the organization descriptions in the NQAP to meet the organizational requirements of 10 CFR 50.54a and Standard Review Plan 800 sections 17.1, 17.2 and 17.3.
24 (cont'd)			Changed title Plan and added Quality Assurance Program Description through the document. Also changed Program to Plan or program description as appropriate to be consistent.
24-A1	09/30/10	5 - 7, 10, 101	Corrected name conversion issue associated with NA to QA and Word 95 to 2007 conversion issue associated with degrees Fahrenheit symbol on page 101.

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25	09/30/2011	1, 11, 12 - 21, 24 - 26, 28 - 32, 35, 44, 48, 52 - 55, 58, 61, 64, 66, 67, 69, 73, 75, 78, 125, 126, 129 - 131, 135, 136	<p>The purpose of this revision is to reflect organization as described by Organization Effectiveness Initiative as it relates to Watts Bar 2, Bellefonte Units 1 & 2 and NGDC Organization. NGDC position titles below Senior Vice President, NGDC have been removed and the positions are described as "management position responsible for."</p> <p>Removed some organizations charts for NGDC organization and modified charts to be generic organizational charts to indicate functional relationships, as described in 10 CFR 50.54(a) (3) (iv).</p> <p>Modified PORC Member: radiological and chemistry control representative(s) to Member: radiation protection representative(s) and Member: chemistry representative(s).</p> <p>Eliminated the Evaluation and Analysis (E and A) Group while the activities previously performed by the E and A Group are now assigned to the Quality Assurance organization.</p> <p>Multiple minor changes throughout the document to reflect the separate NPG QA Organizations and NGDC QA Organizations and describe which group is responsible for specific functions.</p> <p>Changes implemented from QADP-4 requests QAP-2011-001, through QAP-2011-006.</p> <p>Effective date 09/30/2011 to support Change Management for QAP-2011-003, which updated PORC Membership. NPG-SPP-10.5 requires revision.</p>

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26	05/09/2012	12 - 14, 20 - 28, 31, 32, 35, 37 - 39, 45, 49, 50, 53, 54, 56, 58 - 62, 64, 66, 71, 73 - 75, 77, 79, 89, 101, 124 - 127, 129 - 131, 134 - 137	<p>Nuclear Quality Assurance Program Policy Statement was revised to reflect elimination of the TVA Chief Operating Officer (COO) position and reassignment of the COO responsibilities regarding NQAP to the Executive Vice President and Chief Nuclear Officer (CNO). [PER 509082] References to the COO position throughout the NQAP were removed.</p> <p>Organization titles and reporting relationships were revised to reflect the reorganization of the Nuclear Power Group (NPG) and Nuclear Construction (NC), formerly Nuclear Generation Development & Construction (NGDC). [PERs 494361, 506005 and 509082] NGDC Project Management, New Generation Licensing (NGDC) and Training and Performance Improvement (NGDC) positions were eliminated. Quality functions were transferred to appropriate WBN U2 and BLN personnel. Nuclear Generation Development (NGDC) position was eliminated and small modular reactor technology was transferred to technology innovation.</p> <p>Responsibility for Inspection Services Organization (ISO) was transferred from Operating Support and Fleet Governance to Engineering, Environmental & Support Services.</p> <p>Responsibility for Supply Chain was transferred from Executive Vice President and Chief Financial Officer to Executive Vice President and Chief Administrative Officer.</p> <p>Added position description for the newly created position of Senior Vice President Nuclear Support Services in section 4.1.1.</p> <p>Revised the section numbers related to 10CFR73.55 Access Authorization reviews/audits in Appendix B. [QADP-4 Change Request QAP-2011-008]</p> <p>Minor administrative errors were corrected.</p>

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27	08/31/2012	23-24, 32-33, 37, 59, 74, 98, 126	<p>Annual update.</p> <p>Added reference to ASME OM Code in section 5.4.B and Appendix B Table 1 as the requirements for Inservice Testing (IST) of components to assess their operational readiness in light water reactors were removed from ASME Section XI and relocated to ASME OM Code.</p> <p>Incorporates recent Nuclear Construction (NC) organizational changes at WBN U2. Responsibility for pre-operational testing was transferred from the General Manager WBN U2 Technical Services to the General Manager WBN U2 Engineering and Construction. This organizational change also established responsibility for Corrective Action Program (CAP) management to the General Manager WBN U2 Engineering and Construction and reflects the current responsibility for CAP at BLN.</p> <p>Minor administrative errors were corrected.</p>
28	08/30/13	24 68, 77, 125, 127, 129, 131, 134, 135	<p>Removed "their" - editorial change</p> <p>Removed "or" - editorial change</p> <p>Change reporting relationship for Chief Nuclear Officer (CNO). The CNO now reports to the newly-created position of Chief Generating Officer (CGO) rather than the Chief Executive Officer.</p> <p>Annual update.</p>
29	12/02/13	14, 21, 23-28, 30, 32-33, 39-42, 46, 54-55, 57, 59-60, 62-63, 65, 67, 74-76, 78, 84, 94, 105, 109, 123-130, 133-136	<p>Deleted reference to the Senior Manager, BLN QA and made associated grammar adjustments.</p> <p>Changed title of Senior Vice President, Nuclear Construction to Senior Vice President, Watts Bar Operations & Construction (SVP WB O&C).</p> <p>Changed title of Engineering, Environmental & Support Services to Inspection, Testing, Monitor and Analysis.</p> <p>Changed title of Senior Vice President, Nuclear Support Services to Senior Vice President, Nuclear Support and changed positions reporting to the Senior Vice President, Nuclear Support.</p>

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2 9 (cont'd)			<p>Added position of Senior Vice President, Engineering and Technical Services. Changed the direct reporting relationship of the Vice President, Engineering to this position.</p> <p>Changed reporting relationship for the management position responsible for WBN to the SVP WB O&C. Changed title of General Manager, Engineering & Construction to Director, Watts Bar Unit 2. Deleted reference to General Manager, Technical Services. Changed XVXVI to XVI. Changed "programs" to "program".</p> <p>Replaced Nuclear Quality Assurance Plan with "this NQAP" or "the NQAP."</p> <p>Changed title of Senior Vice President, Policy & Oversight to Executive Vice President and Chief Operating Officer (COO).</p> <p>Added "for licensed units."</p> <p>Added last sentence in paragraph.</p> <p>Deleted the second party verification example in the definition of Line Verification.</p> <p>Added "has a line of communication directly to the" to the description of the CNO to the CEO.</p> <p>Added paragraph No. 4 and renumbered No. 4 to No. 5 to correct unintended deletion in Revision 28.</p> <p>Changed "Technical Specification" to "Technical Requirements Manual."</p> <p>Deleted "and construction testing" to clarify responsibilities.</p> <p>Changed title of Chief Generating Officer to Chief Operating Officer.</p> <p>Changed title of Executive Vice President and Chief Administrative Officer to Senior Vice President, Shared Services.</p> <p>Added "Project" to "Bechtel Quality Assurance Manual".</p> <p>Revised organization charts.</p>

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30	08/29/2014	26, 28-32, 35-36, 42, 44-45, 54, 60, 73, 77-79, 84-86, 99, 101, 122, 138	<p>Annual update.</p> <p>Organizational titles, reporting relationships and responsibilities were revised to reflect the reorganization of the Nuclear Power Group (NPG). [QAP-2014-002]</p> <p>Added position description for Senior Vice President, Nuclear Operations to section 4.1.1.</p> <p>Added requirement for General Manager, QA and Corporate QA Manager to have one year nuclear power plant experience in the implementation of the QA Program. [QAP-2014-003, PER 867201]</p> <p>Added requirement for the Corporate QA Manager to have four years experience in the field of quality assurance, or equivalent number of years of nuclear plant experience in a supervisory position, preferably at an operating nuclear plant, or a combination of the two. [QAP-2014-003, PER 867201]</p> <p>Added position description for the newly created position of Manager, Quality Assurance Vendor Audits in section 4.1.7.C.</p> <p>Added position description for the management position responsible for support services in section 4.1.19.</p> <p>Added position description for human resources (nuclear) in section 4.1.20.</p> <p>Added NRC CoC for the Holtec International HI-STORM FW System, Docket No. 72-1032 to section 14.5. [QAP-2013-005]</p> <p>Added a definition for Experience in Nuclear Quality Assurance Related Activities in section 15.0. [QAP-2014-003, PER 867201]</p> <p>Minor administrative errors were corrected.</p>

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31	05/08/2015	16, 24-33, 36, 40, 43-46, 50-51, 53, 57-58, 61-64, 74-75, 77-78, 81, 85-89, 92-96, 115-116, 121, 128-129, 132-133, 135-137	Organizational titles, reporting relationships and responsibilities were revised to reflect the reorganization of the Nuclear Power Group (NPG) including elimination of the Senior Vice President, Operations Support position. [QAP-2015-001] Organizational titles, reporting relationships and responsibilities were revised to reflect the reorganization of the BLN Project from Nuclear Construction to NPG. [QAP-2015-002] Organizational titles, reporting relationships and responsibilities were revised to reflect the creation of the Senior Site Vice President position at BFN. [QAP-2015-003] Added Finding definition in Section 15.0. [QAP-2015-004] Reference errors were corrected in Appendix B Table 1. [PER 1016513, QAP-2015-005] Minor administrative errors were corrected.
32	12/02/2015	16-17, 20, 22, 24-36, 38-40, 43, 49, 54, 57-60, 62, 65, 68, 70, 75, 77-79, 81, 107, 112-113, 120-121, 123, 126-129, 132-134	Annual update. Revised "NPG" to "TVA Nuclear" throughout the procedure. Removed references to WBN2 and Nuclear Construction (NC) to support receipt of WBN2 Operating License. BLN 1 & 2 remains in inactive status. [QAP-2015-006] Clarified requirement to perform annual assessments of BLN 1 & 2 by an independent organization. [CR 1058913-001, QAP-2015-007]

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33	12/02/2016	18, 26, 28-40, 49, 60, 62, 74, 77, 83, 86-87, 90, 102-104, 111, 115-116, 124-125, 131-132, 135	Annual update. Changed title of Executive Vice President & CNO to Executive Vice President Generation & CNO throughout document. Changed title of Senior Vice President, Engineering and Support Services to Senior Vice President, Nuclear Engineering and Operations Support throughout document. Moved Operations Support from Senior Vice President, Nuclear Operations to Senior Vice President, Nuclear Engineering and Operations Support. Realigned the Senior Vice President, Generation, Construction Projects and Services from COO to CNO. Changed title for Vice President, Nuclear Projects to generic title (management position responsible for (corporate) projects). Reporting relationship is unaffected (direct to SVP, Engineering and Operations Support). Moved responsibility for outage planning and execution to manager responsible for operations support. Removed reference to Senior Site Vice President BFN. Removed reference to WBN2 power ascension testing. Reformatted to make distinction between organization structure of BFN compared to SQN and WBN, including creation of a management position for site operations. Replaced titles of managers subordinate to General Manager, QA with generic descriptions. Allows the Executive Vice President Generation and CNO to delegate the signing of the NSRB Chairperson/member appointment letter to a subordinate. The CNO must continue to appoint the Chairperson, members, and alternate members of the NSRB in writing. Aligned Nuclear Fuels under Engineering. Changed reporting relationship of the management position responsible for inspection, testing, monitoring and analysis from Executive Vice President & COO to Executive Vice President Generation & CNO. Deleted responsibility of COO for assuring that Inspection and Testing Services management support nuclear construction activities (now CNO). Revised organizational chart to reflect revised reporting relationships. (QAP-2016-007)

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33 (continued)			<p>Removed ASNT SNT-TC-1A-1984, "Personnel Qualification and Certification in Nondestructive Testing" as source requirement document as all personnel are now certified to ANSI/ASNT CP-189-1995, "Standard for Qualification and Certification of Nondestructive Testing Personnel." Updated ANSI/ASNT CP-189 "Standard for Qualification and Certification of Nondestructive Testing Personnel" from 1991 to 1995 revision. (QAP-2016-003)</p> <p>Realigned the quality control function under the Quality Assurance organization. Added QC to Corporate QA Manager responsibilities. Removed reference to ISO implementing the quality control inspection program. Removed responsibility from the management position responsible for inspection, testing, monitoring and analysis for training and certifying QC personnel. Clarified the management position responsible for ISO is responsible for the qualification or certification of (only) ISO NDE procedures, equipment, and personnel. (QAP-2016-004)</p> <p>Added Nuclear Cyber Security as a TVA identified quality-related program and associated changes. (QAP-2016-005)</p> <p>Updated references to reflect BFN migration from 10CFR50 Appendix R to NFPA 0805. (QAP-2016-006)</p> <p>Updated Appendix B Table 2, Regulatory Guide Conformance Status, to support WBN ISFSI project. ISFSI requirements are uniform throughout Fleet. (QAP-2015-008)</p>

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34	12/01/2017	18-19, 26-40, 84-85, 89, 95, 103-104, 108, 113, 121-122, 125, 132-133, 136	<p>Added a grace period not to exceed 90 days to Contractor/Supplier audits that normally are of 36-month frequency. (QAP-2017-002)</p> <p>Provided additional flexibility in selection and approval of calibration / testing suppliers and provide for potential cost savings by reducing the number of vendor audits / surveys required. (QAP-2017-003)</p> <p>Added commitments associated with annual audits of the Small Modular Reactor (SMR) Project. Clarified that the General Manager, Quality Assurance is responsible for the implementation of Quality Assurance requirements associated with the SMR project. (QAP-2017-004)</p> <p>Added ASNT SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing" as a source requirement document for compliance with ASME Section V - 2010, "Nondestructive Examination". Updated source requirement document ASNT SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing" from 1984 to 2006 edition. (QAP-2017-005)</p> <p>Changed title of senior nuclear employee from Executive Vice President Generation and Chief Nuclear Officer (CNO) to Senior Vice President and CNO throughout the procedure. (QAP-2017-006)</p> <p>Updated reference ANI/MAELU Information Bulletin 80-1A, Revision 2 to ANI Information Bulletin 15-01, Nuclear Liability Insurance Records Retention. (QAP-2017-007)</p> <p>Revised CNO Nuclear Quality Assurance Policy Statement. Revised General section of plan to retain requirements. (QAP-2017-008)</p>

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35	04/13/18	19, 27-30, 37-39, 49, 54, 62, 70, 76, 88, 98, 100, 109, 122-124, 138-149	<p>Revised wording to align with NEI 14-05, Revision 1, Guidelines for the Use of Accreditation in lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services. The previous revision to Subparagraph 4 incorrectly stated, "In lieu of performing an audit, accepting an audit by another licensee, or performing a commercial grade supplier survey" Audits are not performed on commercial suppliers. (QAP-2018-001)</p> <p>Specified program requirements associated with managing QA records in Electronic Media, consistent with the intent of Regulatory Issue Summary (RIS) 2000-18, dated October 23, 2000 and associated Nuclear Information and Records Management Association (NIRMA) Technical Guides (TGs). Specified the use of optical disks for electronic records storage and retrieval systems shall comply with the NRC guidance in Generic Letter 88-19.(QAP-2018-002)</p> <p>Incorporate the requirements for the Clinch River Nuclear Early Site Permit as reflected in NUREG-0800 SRP 17.5 Rev 1, Quality Assurance Program Description - Design Certification, Early Site Permit and New License Applicants. Revised various sections to support Clinch River Nuclear (CRN) Early Site Permit. (QAP-2018-003)</p> <ul style="list-style-type: none"> • Added Appendix K, Clinch River Nuclear Early Site Permit Project • Added Appendix L, Clinch River Nuclear Organization • Added Appendix M, Clinch River Nuclear Commitments and Clarifications for the Early Site Permit QA Program • Revised diagram in Appendix I, TVA Nuclear Organizational Chart. <p>Revised the manager responsible for vendor audits to the manager responsible for quality services, and corrected a typographical error (QAP-2018-004)</p>
36	04/20/18	50	<p>Corrected typographical error. Section 6.3.1 revised to cited reference to Generic Letter (GL) 88-18 instead of GL 88-19. (QAP-2018-005)</p>

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37	04/12/19	20, 32-33, 38-39, 81, 86, 135-136, 139	<p>Added "inspections" to the scope of the CNO Nuclear Quality Assurance Policy Statement. (QAP-2019-001)</p> <p>Revised the Plan based on the following TVA Nuclear organization changes (QAP-2019-002):</p> <ul style="list-style-type: none"> • The management position responsible for outage planning and execution reports to the Senior Vice President, Nuclear Engineering and Operations Support. • The management positions responsible for SQN and WBN nuclear sites now report directly to the Senior Vice President, Nuclear Operations. • The management position responsible for BFN plant operations now reports directly to the management position responsible for the BFN nuclear site. • The manager responsible for corporate QA manages the training program for QA personnel. The manager responsible for quality services is now responsible for managing the QC training program. • The manager responsible for quality services is responsible for the quality control program (not manager responsible for corporate QA). • Revised organizations listed in Appendix G as reporting to the SVP, Engineering and Operations Support, to align with organizations listed in Section 4.1.1.B. • Modified Appendix G organizational structure responsible for supply chain activities to reflect organizational changes. <p>Revised the title of section 10.2 from QA Trending to Quality Trend Analysis. Clarified that quality trend analysis is performed through the periodic review and evaluation of CR data and other performance monitoring information as part of the corrective action program. (CR 1473384) (QAP-2019-003)</p> <p>Clarified that a grace period can not be applied to biennial Cyber Security audits (section 12.2.E.5). (CR 1437863) (QAP-2019-004)</p>
38	04/17/20	19-20, 28, 36, 42, 87, 110, 124-127, 140, 143	<p>Aligned NQAP with NRC provisional recognition of ISO/IEC 17025:2005 and :2017 as stated in the April 16, 2019 letter from the NRC, ADAMS Accession No. ML 19056A451. (QAP 2019-005)</p>

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38 (cont.)	04/17/20		<p>Recognized an alternate method of defining quality requirements (by specifying quality requirements in procurement documents) for non-nuclear TVA organizations performing work for TVA Nuclear as intergroup agreements. (QAP 2019-006)</p> <p>Revised to recognize responsibility for procurement of material belongs to Supply Chain organization, not Engineering. (QAP 2019-007)</p> <p>Facilitates the continued use of SRO-equivalent Nuclear Unit Senior Operators (NUSOs) in the approval function for urgent changes, which is consistent with their SRO duties/responsibilities. NUSOs are no longer considered to be "management" as they are now in the Trades and Labor classification and do not perform personnel / performance management, but still retain technical ability and authority. (QAP 2019-008)</p> <p>Corrected text to align language in Quality Plan with ANSI N45.2.12, Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants for the preparation and review of audit reports. (QAP 2019-009)</p> <p>Revised to reflect the management position responsible for SMR Technology now reports to the management position responsible for nuclear technology innovation. (QAP 2019-010)</p> <p>Revised to allow a maximum vendor audit interval extension of 25% interval, not to exceed a 3.25 interval for three consecutive audits. Based on NRC SER for SNC QAP revision. (QAP 2020-001)</p> <p>Revised to allow a maximum internal audit interval extension of 25% interval. Based on NRC SER for SNC QAP revision. (QAP 2020-002)</p>

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CNO Nuclear Quality Assurance Policy Statement

It is the policy of TVA that activities affecting quality be accomplished in accordance with the TVA Nuclear Quality Assurance Plan (NQAP) and TVA procedures to ensure safe and reliable nuclear operations. As chief nuclear officer, I am responsible for ensuring that nuclear safety is the overriding priority, and that TVA's safety and quality-related activities are carried out in accordance with applicable regulatory and TVA nuclear procedural requirements. QA personnel have a direct reporting relationship to me and act as my representatives to strengthen nuclear safety and compel improved performance through audits, assessments and inspections.

The QA organization is responsible for verifying implementation of quality-related activities at corporate and nuclear plant sites. QA personnel have the authority to initiate stop work, if required, to restrict further processing, delivery or installation of a non-conforming item or unsatisfactory condition until completion of corrective action or satisfactory dispositioning. QA personnel are sufficiently independent from considerations of cost or scheduling to ensure objectivity in performing QA activities. QA personnel have direct access to appropriate levels of management. They also have independence and organizational freedom to be able to effectively assure conformance to QA program requirements.

Line management is responsible for compliance with the NQAP and TVA procedures. Line management ensures quality is emphasized in planning, implementing, verifying and documenting work. Line management is also responsible for pursuing Continuous Improvement through self-assessment practices and prudent application of the Corrective Action Program which may require a level of analysis beyond the minimum required by procedures. Insights from Independent Oversight are expected to be used by line management to improve Nuclear Safety and in the pursuit of Continuous Improvement. Line management is expected to support TVA and the industry QA program audits and assessments with subject matter experts and to provide support of the QA rotational development program.

TVA Nuclear professionals are responsible for complying with TVA procedures as written. Nuclear professionals are expected to value the insights and perspectives of independent oversight and provide timely and effective responses to identified issues. Differing professional opinions are to be encouraged, discussed, and resolved in a timely manner. TVA Nuclear professionals shall ensure a healthy nuclear safety culture by emphasizing safety over competing goals to ensure protection of people and the environment.


Senior Vice President and
Chief Nuclear Officer

2/28/2019
Date

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1.0 PURPOSE

This document defines and describes the nuclear quality assurance (QA) requirements for Tennessee Valley Authority (TVA) and establishes responsibilities for their implementation. The principal objective of the Nuclear Quality Assurance Plan (NQAP) is to provide confidence that activities affecting quality during design, construction, early site permits, operation, and maintenance are accomplished in a manner to achieve compliance with pre-established quality objectives and acceptance criteria.

2.0 APPLICABILITY

The NQAP applies to (1) TVA Nuclear personnel and organizations performing activities that could affect quality-related structures, systems, and components at TVA's nuclear plants and ISFSI; (2) TVA non-nuclear organizations working either directly under the TVA NQAP, under their program as required by intergroup agreement, or under the quality requirements specified in applicable procurement documents; and (3) contractor activities that could affect quality-related structures, systems, and components, unless TVA Nuclear has approved alternate administrative controls for those activities.

3.0 GENERAL

It is the policy of the Tennessee Valley Authority (TVA) that activities which affect quality be accomplished in a planned and systematic manner to achieve compliance with pre-established quality objectives and acceptance criteria. Accordingly, TVA has established and will maintain a quality assurance program.

The QA program is founded on the principle that the line organization has the primary responsibility for quality and safety. Quality assurance objectives are not to be subordinated to achieving cost or schedule objectives. Line management will be held accountable for compliance with the quality assurance program and quality requirements. Self-assessment practices are used to ensure the desired levels of quality and safety are achieved and maintained.

Management policies and requirements for the TVA Quality Assurance Program are established by the Senior Vice President and Chief Nuclear Officer (CNO). These management policies and requirements provide the controls that must be applied to the activities performed by and for the agency to ensure implementation of TVA commitments. Conflicts involving interpretation of quality assurance requirements of TVA's NQAP are resolved by the Senior Vice President and CNO.

Activities may be performed by a contractor using their quality assurance program provided that the contractor's quality assurance program is approved by TVA and appropriate interfaces are established. Where TVA has delegated responsibility for implementation of parts of the NQAP to contractors, TVA line management retains responsibility for adequacy of contractor implementation of quality requirements.

This NQAP is formatted in such a manner as to provide users with a functionally usable document from which Nuclear Procedure System (NPS) documents are developed to implement the requirements stated herein.

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3.0 GENERAL (continued)

The source requirement documents for QA activities are listed in Appendix B. Not only are the source requirement documents listed (e.g., ANSI Standards and Regulatory Guides) but they also specify the particular sections of these source documents that must be addressed (e.g., ANSI N18.7, Section 5.2.12). Providing specific sections of the source requirement documents facilitates use by individuals responsible for the development of applicable procedures and instructions.

However, it must be stressed that the entire set of source requirement documents referenced in each section must be reviewed and understood to capture the program requirements of each source requirement document in QA Program procedures and instructions.

Appendix M identifies the NRC Regulatory Guides and other quality assurance standards which have been selected to supplement and support the TVA NQAP for the Clinch River Nuclear Early Site Permit (CRN ESP) QA program.

The following subsections identify the management and regulatory requirements applicable to the NQAP. An overview of the program and a description of the functions of the various organizations performing activities within the scope of the program are provided.

3.1 General Management Requirements

The management policies and requirements for the QA Program are established by the Senior Vice President and Chief Nuclear Officer (CNO). These management policies and requirements provide the administrative controls that shall be applied to activities performed by and for TVA to ensure activities are performed in a manner consistent with QA objectives and to provide adequate record of accomplishment of commitments.

3.2 General Regulatory Requirements

The NQAP shall address the conditions of licenses and permits and encompass the applicable regulatory requirements contained in Appendix B of this program description.

3.3 NQAP Overview

The quality assurance program includes the CNO Nuclear Quality Assurance Policy Statement, this NQAP, the ASME Section III Quality Assurance Manual (ASME III QAM) (when active), and other quality-related NPS documents. The NQAP provides direction and implements requirements derived from regulatory requirements, national codes and standards, and other TVA commitments. General regulatory guidance and national standards that TVA is obligated to implement in the NQAP are listed in Appendix B, "Regulatory Guide Conformance Status."

Appendix M identifies the NRC Regulatory Guides and other quality assurance standards which have been selected to supplement and support the TVA NQAP for the CRN ESP QA program.

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3.3.1 Implementation

- A. The requirements established by this program description and the ASME III QAM (when active) are implemented by TVA Nuclear documents sponsored by various organizations. To ensure the NQAP is fully integrated and implemented, procedures and instructions address additional implementing level details contained in requirement documents on which the NQAP is based.
- B. The terms "procedure" and/or "instruction," when used within this program description, also includes written standards and documents of a similar nature.

3.3.2 Authority and Organizational Freedom of Those Performing QA Verification

Personnel with responsibility for performing QA verification functions shall have sufficient authority and organizational freedom to:

- A. Identify quality problems.
- B. Initiate, recommend, and provide corrective actions through a comprehensive corrective action program.
- C. Verify the implementation of corrective actions.
- D. Initiate stop work, if required, to restrict further processing, delivery, or installation of a non-conforming item or unsatisfactory condition until completion of corrective action or satisfactory dispositioning.

The individuals and organizations responsible for performing QA verifications and assessments of the NQAP shall be formally designated and sufficiently independent from considerations of cost or scheduling to ensure objectivity in performing assessments. They shall be afforded direct access to appropriate management levels.

QA verification of conformance to established quality assurance program requirements is accomplished by those who have neither the direct responsibility nor the authority for performing the quality-related work activities being verified.

3.3.3 Assessment of Effectiveness

The General Manager, QA, shall assess the overall effectiveness of the NQAP for Corporate and nuclear plant sites (Browns Ferry (BFN), Sequoyah (SQN), Watts Bar (WBN), Bellefonte (BLN) and Clinch River (CRN)). Results shall be reported to the Senior Vice President and CNO, and affected vice presidents. These assessments include TVA Nuclear and non-nuclear organizations and contractors. QA verifies the effectiveness of NSSS suppliers through audits and annual review of their performance.

The General Manager, QA shall arrange for a biennial assessment of the TVA Nuclear Quality Assurance program by an organization external to the QA organization. The General Manager, QA shall arrange for the assessment of the performance of the BLN QA program by an independent organization at a frequency that meets regulatory requirements. The management position responsible for quality services shall arrange for the assessment of the CRN ESP QA program by an independent organization on an annual basis.

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3.3.4 Achievement of Quality in Performance

Management personnel shall ensure, through organizational structure, self-evaluation, and assigned functional responsibilities, that the attainment of program objectives is accomplished by those who have been assigned the work. Achievement of quality in the performance of quality-related activities is the responsibility of each individual involved in TVA's nuclear power program.

3.3.5 Interpretation of Quality Assurance Program Requirements

The General Manager, QA shall provide interpretation of NQAP requirements for TVA organizations. Differences involving interpretation or implementation of the NQAP shall be immediately identified and reported to QA for resolution. If satisfactory resolution is not readily attainable, then the difference shall be escalated to the appropriate executive nuclear manager and ultimately the Senior Vice President and CNO, if necessary.

3.3.6 Units with Construction Permits

Refer to Appendix G for BLN 1 & 2 construction permits.

3.3.7 Early Site Permits

Refer to Appendix K, L and M for CRN Early Site Permit.

4.0 ORGANIZATION

The organizational structure, functional responsibilities, levels of authority, and lines of internal and external communication for the management, direction, and execution of the NQAP shall be clearly established for all organizational levels. This NQAP describes the general organizational structure and primary responsibilities of the TVA Nuclear organization and responsibilities of non-nuclear organizations involved in the NQAP. The Human Resources organization shall prepare organization charts that show overall TVA Nuclear organizational structure.

The overall organizational structure is shown in Appendix I. The QA organizations are responsible for establishing upper-tier QA Program requirements and implementation of Quality Assurance functions at corporate and nuclear plant sites. The size of the QA organizations, including the size of respective Site QA staffs, is determined by assessing the resources required to adequately perform functions and workloads assigned to each QA organizational unit.

Each plant's Final Safety Analysis Report (FSAR) references the TVA Organization Topical Report (TVA-NPOD89A) or provides a description of other key organizational positions, including the Senior Vice President and CNO's organization and plant operating staffs, responsible for administering and implementing the NQAP.

CRN site specific organization information is located Appendix K and L.

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4.1 Functions of Organizations

TVA management, while carrying out their functions, are required to fully comply with all aspects of the NQAP applicable to their organization and ensure proper implementation. This subsection identifies (1) functional responsibilities that are generally implemented through procedures and instructions by all TVA organizations involved in the program and (2) specific NQAP responsibilities for sponsors of upper-tier corporate program documents.

4.1.1 Executive Nuclear Management

- A. The Senior Vice President and CNO has the overall responsibility for the establishment, implementation, and administration of TVA's NQAP and the evaluation of its effectiveness. This responsibility is administered through management staff.
- B. The Senior Vice President, Nuclear Engineering and Operations Support reports directly to the Senior Vice President and CNO and has responsibility for support organizations that coordinate and integrate efforts and initiatives into day-to-day TVA Nuclear business. Organizations reporting to this position include nuclear engineering, operations support, outage scheduling and execution, and regulatory affairs and support services.
- C. The Senior Vice President, Nuclear Operations reports directly to the Senior Vice President and CNO and has responsibility for organizations that coordinate and integrate efforts and initiatives into day-to-day TVA Nuclear business. The management positions responsible for each nuclear operating site report to this position.

4.1.2 TVA Organizations

All TVA organizations that work directly under the TVA NQAP have the following general functions:

- A. Invoke appropriate NQAP requirements on other organizations that provide services for quality-related programs and features.
- B. Regularly review the status and adequacy of those parts of the NQAP, which they are executing.
- C. Develop, control, and maintain procedures and instructions as appropriate to implement quality-related activities and processes.
- D. Ensure appropriate controls for documents and records generated within the organization or received from external sources.
- E. Ensure appropriate controls are developed and implemented to maintain housekeeping and cleanliness requirements of facilities, systems, and components during the performance of work activities.
- F. Identify and resolve adverse conditions and perform related corrective action activities including assessing trends for internally and externally identified problems.
- G. Make personnel and resources available during audit performance and ensure that audit responses and corrective actions are completed within established timeframes.

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4.1.2 TVA Organizations (continued)

- H. Develop certification programs as appropriate and ensure that trained, qualified, and, where required, certified employees are used in the performance of quality-related activities.
- I. Initiate stop work within their area of responsibilities when warranted.
- J. Ensure personnel performing quality-related activities receive indoctrination and training as necessary to ensure that adequate proficiency is achieved and maintained.
- K. Ensure procedures adequately address interfaces of affected organizations.
- L. Ensure during preparation and review of procedures and procurement documents that appropriate technical and QA requirements are included.

4.1.3 Nuclear Operations (NO)

- A. In addition to the responsibilities described in subsection 4.1.2, the Senior Vice President, Nuclear Operations is responsible for ensuring that the QA requirements established by this program description are either included or referenced (as appropriate) in related NO-sponsored program areas identified in the body of this program description.
- B. The management positions responsible for each nuclear site reports to the Senior Vice President, Nuclear Operations.
- C. The management position responsible for each nuclear site is also responsible for:
 - 1. The site compliance with the operating unit license, governmental regulations, and ASME Code requirements.
 - 2. Supplementing programs at licensed units ensuring that the QA requirements of this program description are appropriately established in licensed unit's site procedures.
 - 3. The plant technical review process and PORC.
 - 4. Fire Protection Program.
- D. Site Organizations
 - 1. The following site management positions report to the management position for SQN and WBN sites:
 - a. The management position responsible for plant operations.
 - b. The management position responsible for engineering.
 - c. The management position responsible for plant support, which includes safety and licensing, emergency preparedness, performance improvement, document control and quality assurance records management.

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4.1.3 Nuclear Operations (NO) (continued)

- d. The management position responsible for training.
 - e. The management position(s) responsible for project management.
 - f. The management positions responsible for business operations and planning is matrix to this position.
 - g. The management position responsible for nuclear security, which includes protection of safeguard information, reporting of safeguard events, and development and maintenance of the Site Physical Security/Contingency Plans.
2. The following site management positions report to the management position for BFN site:
- a. The management position for site operations, which includes engineering, training, nuclear security (protection of safeguard information, reporting of safeguard events, and development and maintenance of the Site Physical Security/Contingency Plans) and plant support (safety and licensing, emergency preparedness, performance improvement, document control and quality assurance records management).
 - b. The management position responsible for plant operations.
 - c. The management position responsible for project management.
 - d. The management positions responsible for business operations and planning is matrix to this position.

4.1.4 Operations Support

- A. The management position responsible for corporate operations support reports to the Senior Vice President, Nuclear Engineering and Operations Support.
- B. In addition to the responsibilities described in subsection 4.1.2 the management position is responsible for:
 - 1. providing corporate governance of functional areas (maintenance, operations, radiation protection, chemistry, work control, organizational effectiveness, and procedures) for TVA's nuclear fleet,
 - 2. developing programs to control procedures and instructions,
 - 3. maintaining the Nuclear Operating Experience Review Program,
 - 4. providing corporate oversight and governance of the planning and execution of plant nuclear outages and outage scheduling, and and

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4.1.4 Operations Support (continued)

5. overseeing the training and performance improvement functions, including development of the TVA Nuclear corrective action program, and establishing and maintaining trend analysis procedures for adverse conditions and quality indicators.

4.1.5 Nuclear Engineering

- A. The management position responsible for nuclear engineering reports to the Senior Vice President, Nuclear Engineering and Operations Support. For issues involving nuclear safety or quality, the management position responsible for nuclear engineering has the requisite authority and organizational freedom to report directly to the Senior Vice President and CNO.
- B. This management position is responsible for ensuring that the QA requirements established in this program description are either included or referenced (as appropriate) in related engineering-sponsored program areas identified in the body of this program description.
- C. In addition to the responsibilities described in subsection 4.1.2, the management position is responsible for:
 1. development of programs to control documents and development of a QA records program.
 2. support of the computer process systems. Computer process systems support coordinates the implementation of the software quality assurance program.
 3. Nuclear Cyber Security, which includes the development and maintenance of the Site Cyber Security Plans.
- D. Developing and maintaining the ASME III QAM for Bellefonte are the responsibilities of the manager responsible for BLN Project.
- E. The engineering organizations are responsible for independent technical reviews. These reviews primarily include:
 1. System performance monitoring as required by the Maintenance Rule, 10 CFR 50.65.
 2. Technical operability evaluations.
 3. Review of technical specification changes that affect the design basis.
 4. Review of Final Safety Analysis Report changes that affect the design basis.
 5. Self assessments to ensure maintenance of design basis and adequacy of technical programs.

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4.1.6 Procurement

- A. The management position responsible for procurement reports through the Vice President, Supply Chain to the Executive Vice President and Chief Operating Officer.
- B. In addition to the responsibilities described in subsection 4.1.2, the management position responsible for procurement, is responsible for ensuring that the QA requirements established by this program description are either included or referenced (as appropriate) in related Procurement sponsored program areas identified in the body of this Program.

4.1.7 Nuclear Regulatory Affairs and Support Services

- A. The management position responsible for nuclear regulatory affairs and support services reports to the Senior Vice President, Nuclear Engineering and Operations Support.
- B. In addition to the responsibilities described in subsection 4.1.2, the management position for nuclear regulatory affairs and support services is responsible for:
 - 1. Maintaining an interface between TVA and NRC for licensing activities.
 - 2. Directing and managing Nuclear Safety Review Board (NSRB) activities.
 - 3. Managing the emergency preparedness and nuclear security organizations.
- C. Nuclear Safety Review Board
 - 1. The NSRB is an offsite committee, which provides senior level oversight of TVA's nuclear program with respect to nuclear safety. The NSRB reviews include the activities of the line organizations, as well as other review, audit, and verification organizations. The NSRB also provides senior level management with an assessment of facility operations and recommendations to improve nuclear safety and plant reliability.
 - 2. The Chairperson, NSRB, has an independent reporting relationship to the Senior Vice President and CNO, and other TVA Nuclear management on nuclear safety matters. The Chairperson, NSRB, is responsible for advising the Senior Vice President and CNO on the adequacy and implementation of TVA's nuclear safety policies and programs and for evaluating these policies and programs for compliance with regulatory requirements governing nuclear safety.
 - 3. The Chairperson NSRB, is responsible for complying with the requirements of ANSI N18.7-1976/ANS 3.2. The management position responsible for nuclear licensing is responsible for ensuring that the QA requirements established by the QA program related to NSRB functions are either included or referenced (as appropriate) in related procedures or instructions.
 - 4. The NSRB shall function to provide for independent review as specified in Section 4.1.7C.5.b and oversight of operational phase audits and technical reviews as specified in Sections 12.2E and 4.1.5E.

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4.1.7 Nuclear Regulatory Affairs and Support Services (continued)

5. The Chairperson, members, and alternate members of the NSRB shall be appointed in writing by the Senior Vice President and CNO. The Senior Vice President and CNO may delegate the signing of the appointment letter to a subordinate.

Each member shall have an academic degree in engineering or a physical science field, or the equivalent; and shall have a minimum of five years technical experience in one or more of the areas specified in ANSI N18.7-1976/ANS 3.2.

The NSRB shall be composed of at least five members, including the Chairperson. Members of the NSRB may be from TVA Nuclear, or other TVA organizations or external to TVA. No more than two alternates shall participate as voting members in NSRB activities at any one time.

a. Functions

The NSRB shall, as a minimum, incorporate the following functions:

- (1) Advise the Senior Vice President and CNO on all matters related to nuclear safety;
- (2) Recommend to the Senior Vice President and CNO any corrective action to improve nuclear safety and plant operations; and
- (3) Notify the Senior Vice President and CNO of any safety significant disagreement between the NSRB and the organization or function being reviewed.

b. NSRB Review Responsibilities

The NSRB shall be responsible for the review of:

- (1) The 10 CFR 50.59 Program. 10 CFR 50.59 evaluations will be screened. Review of representative 10 CFR 50.59 evaluations will be performed, selected based on safety significance, for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provision of 10 CFR 50.59, to verify that such actions did not require a license amendment;
- (2) Proposed changes to procedures, equipment, or systems that require a license amendment as defined in 10 CFR 50.59;
- (3) Proposed tests or experiments that require a license amendment as defined in 10 CFR 50.59;
- (4) Proposed changes to Technical Specifications or the Operating License relating to nuclear safety prior to implementation, except in those cases where the change is identical to a previously reviewed proposed change;

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4.1.7 Nuclear Regulatory Affairs and Support Services (continued)

- (5) Violations of codes, regulations, orders, license requirements, and internal procedures or instructions having nuclear safety significance;
 - (6) Reportable events (10 CFR 50.73);
 - (7) Plant staff performance;
 - (8) Recognized indications of unanticipated deficiencies in any aspect of design or operation of structures, system, or components that could affect nuclear safety;
 - (9) Significant accidental, unplanned, or uncontrolled radioactive releases, including corrective action to prevent recurrence;
 - (10) Significant operating abnormalities or deviations from normal and expected performance of equipment that affect nuclear safety; and
 - (11) Implementation of the corrective action program.
 - (12) The 10 CFR 72.48 Program. 10 CFR 72.48 evaluations will be screened. Review of representative 10 CFR 72.48 evaluations will be performed, selected based on safety significance, for 1) changes to procedures, facility, or spent fuel storage cask design, and 2) tests or experiments completed under the provision of 10 CFR 72.48, to verify that such actions did not require a license amendment;
 - (13) Proposed changes to procedures, facility, or spent fuel storage cask design that require a license amendment as defined in 10 CFR 72.48.
- c. Minutes of each NSRB meeting and reports of other reviews shall be forwarded to the Senior Vice President and CNO within 30 days following completion of the meeting or review.

4.1.8 Clinch River Nuclear

- A. See Appendix K and L for SMR Project roles and responsibilities at the Clinch River Nuclear site.
- B. The General Manager, Quality Assurance administers QA responsibilities for CRN through the management position responsible for quality services.
- C. The management position responsible for quality services is responsible for invoking appropriate NQAP requirements on vendors that provide services for quality-related programs and features.
- D. The management position responsible for quality services shall ensure an audit of CRN, to the applicable criteria of 10CFR50 Appendix B, is performed on an annual basis in accordance with NQAP Section 12.0, Auditing, and shall arrange for the assessment of the CRN QA organization by an independent organization on an annual basis.

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4.1.9 Nuclear Oversight

The management position responsible for nuclear oversight reports to the Senior Vice President and CNO and manages the TVA Nuclear Quality Assurance organization.

4.1.10 Quality Assurance (QA)

- A. The General Manager, QA, reports to the management position responsible for nuclear oversight. The General Manager, QA has an independent reporting relationship to the Senior Vice President and CNO on quality issues.

The quality organization has direct access to appropriate levels of management and sufficient independence and organizational freedom to be able to effectively assure conformance to quality assurance program requirements.

The General Manager, QA, administers quality assurance responsibilities through the management positions responsible for corporate QA, site QA and quality services.

The General Manager, QA, is required to have a bachelor's degree in an engineering or related science, or equivalent related experience. The General Manager, QA, shall have at least 10 years experience in a senior managerial capacity with five years' experience in nuclear quality assurance related activities. At least one year of experience shall be nuclear power plant experience in the implementation of the quality assurance program.

The General Manager, QA has responsibility for the administration of TVA's NQAP requirements for projects being implemented on operating units by other organizations. The General Manager, QA has responsibility for NQAP implementation for BLN Construction Permit status under guidance of GL-87-15 and RG 1.2 and other organizations.

The General Manager, QA administers QA responsibilities for CRN through the management position responsible for quality services.

- B. The management position responsible for corporate QA reports directly to the General Manager, QA, and manages the development and maintenance of TVA Nuclear quality assurance programs to ensure compliance with regulations, commitments, and policies, including those Quality Assurance programs that govern activities performed by site Quality Assurance organization personnel. The management position responsible for corporate QA also manages the training program for TVA Nuclear QA personnel and the quality audit program.

The management position responsible for corporate QA is required to have four years experience in the field of quality assurance, or equivalent number of years of nuclear plant experience in a supervisory position, preferably at an operating nuclear plant or a combination of the two. At least one year of this four years experience shall be nuclear power plant experience in the implementation of the quality assurance program.

- C. The management position responsible for quality services reports directly to the General Manager, QA. The management position responsible for quality services:

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4.1.10 Quality Assurance (QA) (continued)

1. manages TVA's review and qualification of suppliers to ensure final acceptance of all "safety-related material" for all nuclear plants to comply with applicable specifications and requirements.
 2. manages the vendor audit program.
 3. develops and implements the nuclear Quality Control (QC) program which includes the QC inspection program, and the QC training program.
 4. ensures an audit of CRN, to the applicable criteria of 10CFR50 Appendix B, is performed on an annual basis in accordance with NQAP Section 12.0, Auditing and shall arrange for the assessment of CRN QA program by an independent organization on an annual basis.
- D. The management positions responsible for site QA report directly to the General Manager, QA, and are responsible for the quality assurance functions and oversight of quality control performance at the site. The management positions responsible for site QA provide oversight of day-to-day plant activities important to safety (for example, the QA organization routinely attends and participates in daily plant work schedule and status meetings to assure they are kept abreast of day-to-day work assignments throughout the plant and that there is adequate QA coverage).
- The management positions responsible for site QA are required to have a bachelor's degree in an engineering or scientific discipline, or equivalent related experience. They shall have at least nine years experience in plant design, construction, power plant operation, or maintenance, including five years experience in QA-related activities.
- E. TVA Nuclear Quality Assurance is responsible for:
1. Developing and administering the NQAP and the QA organization procedures required to ensure that TVA activities provide the required degree of safety and reliability.
 2. Providing oversight of TVA activities by auditing, inspecting, assessing and observing the conduct of activities at corporate and nuclear plant sites to ensure that they provide the required high degree of safety and reliability and are carried out consistent with applicable laws, regulations, regulatory commitments, licenses, and other requirements. The depth and scope of oversight is dependent on the item's or subject's importance to safety and performance history.
 3. Stopping work or further processing, delivery, or installation or taking other comparable actions when warranted to control and/or prevent the use of non-conforming materials or continuance of activities adverse to quality at Corporate and nuclear plant sites.

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4.1.10 Quality Assurance (QA) (continued)

4. Establishing upper-tier QA requirements for QA training and for evaluating the implementation and effectiveness of that training.
5. Developing and implementing the vendor audit and services QA Program which includes auditing, source inspection and surveillance of supplier activities. Developing and maintaining the Acceptable Suppliers List (ASL) of approved vendors.
6. Conducting overview of procured engineering services (offsite) including the review of procurement documents for QA requirements utilizing graded approach criteria, in-depth technical and/or performance based auditing, performing pre-award surveys, and reviewing contractor QA programs.
7. Planning, conducting, and reporting the results of corporate and site audits and following-up identified adverse conditions to ensure appropriate corrective action has been taken.
8. Reviewing and/or auditing QA programs of TVA non-nuclear organizations which support nuclear quality-related activities.
9. Developing, reviewing, and maintaining the NQAP.
10. Verifying through assessing or other means that QA requirements are contained in applicable Site QA program procedures, and quality-related activities comply with QA program requirements.
11. Developing and implementing the nuclear QC program which includes the QC inspection program.
12. Reviewing the ASME III QAM - BLN 1 & 2 (when active).
13. Managing development, maintenance, and improvements of site/corporate quality methodologies to evaluate quality programs and technical programs based on observations and trending.
14. Analyzing technical and quality programs from many sources to develop recommendations for senior management action. This includes oversight and independent analysis of trending results. Results are provided to senior management. Advising senior management relative to alternative solutions to technical and quality problems to improve the effectiveness and efficiency of implementation techniques.
15. Advising and interfacing with senior site and corporate management on matters pertaining to the assessment program to aid in the identification and resolution of items that could result in enforcement actions, reduction in power generation, or endangering the health and safety of the general public.

4.1.11 Bellefonte Units 1 & 2

See Appendix G.

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4.1.12 Inspection, Testing, Monitoring and Analysis

The management position responsible for inspection, testing, monitoring and analysis reports to the Executive Vice President Generation through the management position responsible for generation construction, projects and services. This position is responsible for the Inspection Services Organization (ISO). ISO assists the responsible organization at the sites in the performance of ASME, Section XI, NDE. This organization has a quality responsibility to the management position responsible for nuclear engineering.

4.1.13 Human Resources (Nuclear)

The management position responsible for human resources (nuclear) has the requisite authority and organizational freedom to report directly to the Senior Vice President and CNO for issues related to nuclear personnel. In addition, the management position responsible for human resources (nuclear) maintains a position qualification documentation and validation program.

5.0 NUCLEAR QA PROGRAM

The General Manager, QA, develops this program description to establish the requirements of the NQAP that encompass the general management and general regulatory requirements in sections 3.1 and 3.2 of this program description. The program requirements apply to design, construction, testing, operation, maintenance, repair, replacement, and modification of TVA nuclear facilities.

TVA Nuclear and TVA non-nuclear organizations performing activities within the scope of the NQAP shall implement the program through written procedures and instructions.

TVA non-nuclear organizations providing services within the scope of the NQAP through an Intergroup Agreement, or under the quality requirements specified in applicable procurement documents, shall develop QA programs that comply with nuclear requirements. These QA programs shall be assessed and/or audited by QA.

5.1 Program Scope

- A. The requirements of the NQAP shall apply to activities associated with structures, systems, and components which are safety-related or controlled by 10 CFR 72, and shall take into account special equipment, environmental conditions, skills, or processes.
- B. The requirements shall also apply to TVA identified quality-related programs and features which are important to the continued reliable operation of TVA's nuclear facilities. Organizations responsible for these programs and features shall determine the extent to which these requirements apply and develop and document applicable NQAP elements and the levels of verification required.
 1. Technical requirements related to engineering design are specified by the manager responsible for nuclear engineering. QA shall review or assess these programs and features. The program procedures shall be included in NPS documents.

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5.1 Program Scope (continued)

2. Programs and features for which the NQAP applies are listed below. Appendix C, "Guidelines for Determination of TVA-Identified Quality-Related Classifications," was used to develop the list.
 - a. Radiological Control.
 - b. Emergency Preparedness.
 - c. Nuclear Plant Security.
 - d. Radioactive Material Shipment.
 - e. Special Nuclear Material Management.
 - f. Fire Protection.
 - g. Radwaste Management Systems, Structures, and Components.
 - h. Seismic Category I (L) Items.
 - i. Non safety-related Anticipated Transient Without Scram (ATWS) Equipment.
 - j. Chemistry.
 - k. Safety Parameter Display System
 - l. 10 CFR 72 - NUREG/CR - 6407 Important To Safety Category C Components
 - m. Nuclear Cyber Security

When using services outside TVA Nuclear, responsible organizations for the above programs and features shall specify the extent of applicable QA requirements.

- C. To facilitate proper application and implementation of the NQAP, the manager responsible for a nuclear site (delegated to the manager responsible for engineering at the nuclear site) shall develop a Q-List for each nuclear unit. The Q-List shall document and classify structures, systems, and components consistent with their importance to safety.
- D. Selected requirements of the NQAP shall apply to safety-related activities associated with the license application for new nuclear generation.

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5.2 Graded Approach

The NQAP shall provide for the graded application and verification of QA requirements to quality-related items and activities.

A. The following criteria are to be considered when applying NQAP requirements:

1. The impact on safety of an item malfunction or failure.
2. The specification, design, fabrication complexity, or uniqueness of the item, and the environment under which the item must function.
3. The need for special controls and assessments of equipment, processes, and operational activities.
4. The degree to which functional compliance can be demonstrated by an inspection or test.
5. The quality history of the item or activity and its degree of standardization.
6. The intended life span during which the item must perform a quality-related function.
7. Requirements of applicable codes and standards.

B. The following factors are to be considered in the degree of QA verification required to ensure implementation of NQAP requirements:

1. New activities not previously performed or implemented.
2. Trend or previous histories of quality problems.
3. Activities critical to safety or having the most potential to impact safety.
4. Revisions of the procedures which have recently been implemented.
5. Activities that have not been assessed in the recent past or are performed infrequently.
6. Activities that are performed by new personnel, contractors, or technicians.
7. The requirements of applicable codes and standards that are mandated for the item or activity.

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5.3 Program Elements

This section identifies or references the NQAP elements delineated through the ASME III QAM for BLN 1 & 2 (when active) during construction completion and implemented through TVA Nuclear procedures and instructions. The documents identified in Appendix B contain QA requirements applicable to the NQAP elements. The NQAP shall encompass the following elements:

- A. Establishment and use of a comprehensive list of safety-related structures, systems, and components for each TVA nuclear plant unit and ISFSI identifying the critical plant features that will receive the highest level of QA program application.
- B. Use of a graded approach in the application and verification of NQAP requirements. Quality-related items and activities shall be subjected to a level of QA controls and verification commensurate with their importance to nuclear safety.
- C. Assignment of responsibilities to appropriate organizations and positions for implementation of the NQAP.
- D. Preparation of NPS documents which provide specific guidance in planning, performing, assessing, and controlling activities affecting quality to ensure that quality-related activities are performed in accordance with applicable national codes and standards, regulatory requirements, licensing commitments, and management requirements.
- E. Verification of the adequacy of quality-related structures, systems, and components by appropriate inspections, tests, and assessments; and of quality-affecting activities by periodic reviews, audits, and assessments to ensure the adequacy and effectiveness of the NQAP and its implementation.
- F. Provisions for adequate indoctrination and training of personnel, and qualification or certification when required, prior to their performing activities which affect quality.
- G. Provisions for special controls, processes, test equipment, tools, and skills necessary to attain the required quality.
- H. Measures to control cleanness of facilities, material, and equipment; fire prevention; plant access; and equipment protection. Controls shall be applied to the extent necessary to ensure that only proper materials, equipment, processes, and procedures are utilized, and that the quality of items is not degraded through improper practices and techniques.
- I. Prompt identification, documentation, evaluation, and correction of adverse conditions.
- J. Generation and retention of adequate records to demonstrate compliance with NQAP requirements, applicable national codes and standards, and regulatory requirements.

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5.4 Program Documents

The quality assurance program shall be documented by written procedures and instructions. The quality assurance program documents, required by this program description and the ASME III QAM (when active) are contained in the NPS. Requirements for preparation, review, concurrence, and approval of NQAP documents are contained in NPS documents.

A. ASME III QAM for BLN 1 & 2 (when active) during Construction Completion

Associated with this program description is the ASME III QAM. The ASME III QAM is a self-contained manual that prescribes specific QA requirements for the control of items and activities subject to the ASME Code Section III, Division 1. The ASME III QAM satisfies the ASME Section III Code requirement to fully describe both the quality assurance program and the specific responsibilities applied to TVA's activities as an "N" certificate holder. The ASME III QAM is filed with the Authorized Inspection Agency in accordance with the requirements of ASME Code, Section III. Changes to the ASME III QAM shall be coordinated with the Authorized Inspection Agency for review and acceptance prior to implementation.

B. Nuclear Quality Assurance Plan

This Nuclear Quality Assurance Plan (Quality Assurance Program Description) contains regulatory and management QA requirements and responsibilities that other NPS documents must address. This program description and implementing documents meet the requirements of 10 CFR 50, Appendix A; 10 CFR 50, Appendix B; 10 CFR 72, Subpart G; applicable ASME Section XI and ASME OM Code requirements for a nuclear QA program. To ensure the nuclear program is fully integrated, additional implementing level details contained in requirements documents shall be included in procedures and instructions sponsored by implementing organizations.

C. Implementing Procedures

The NQAP establishes the quality assurance program requirements. The NQAP places responsibilities on identified sponsors to develop specific elements of the quality assurance programs addressing specific requirements of source requirement documents. Sponsors of NPS documents are required to identify the document as "quality related" if it contains quality assurance program requirements. Corporate NPS documents identified as quality related receive review and concurrence by QA personnel or others knowledgeable of QA requirements.

5.5 Program Changes

Changes to the NQAP shall be submitted to the NRC in compliance with 10 CFR 50.54 and 10 CFR 50.55. Changes to the NQAP will be distributed to senior managers and department heads for incorporation into their quality procedures.

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6.0 CONTROL OF DOCUMENTS AND RECORDS

6.1 Procedures and Instructions

6.1.1 General

- A. The QA program requires that quality-related activities shall be prescribed by documented procedures and instructions appropriate to the circumstances. Activities shall be accomplished in accordance with these procedures and instructions.
- B. The requirements of this section are applicable to the preparation, review, and approval of procedures and instructions (for example, this program description, NPS documents, ASME III QAM, etc.). Requirements for the preparation, review, and approval of drawings are in Section 7.0 of this program description. Requirements for plant reviews are in Section 9.9 of this program description.

6.1.2 Program Elements

A. Content

Procedures and instructions shall:

- 1. Describe quality-related activities in adequate detail for the intended user, and include quantitative or qualitative acceptance criteria sufficient for determining that the activities have been satisfactorily accomplished.
- 2. Describe significant interfaces between personnel and organizations that affect, or are affected by, quality-related activities.
- 3. Include or reference appropriate technical, QA, regulatory, and licensing requirements, including those in design output documents.

B. Review

Procedures and instructions shall:

- 1. Receive a documented review for adequacy by a qualified reviewer other than the preparer.
- 2. Receive the review and concurrence of affected organizations outside the issuing organization prior to approval, unless concurrence has been established in a higher-level document.
- 3. Receive a review to ensure proper incorporation of QA requirements. These reviews are by QA personnel or others knowledgeable of QA requirements.

C. Approval

Procedures and instructions shall be approved for release by the sponsoring organization prior to use.

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6.1.2 Program Elements (continued)

D. Procedural Control

Procedures shall be issued for the identification and control of quality-related procedures, instructions, and their changes. The organizations responsible for preparing, reviewing, approving, and issuing procedures, instructions, and changes shall be specified.

E. Review of Operational Phase Procedures

Operational phase site procedures and instructions shall be reviewed to ensure that specific known changes in source documents or changes identified through usage are included as necessary and in a timely manner. The following mechanisms ensure that appropriate procedure reviews are conducted:

1. Plant modification program
2. Resolution of issues identified by QA, NRC, Licensing, and corrective action program
3. Technical specification and FSAR update reviews (including the contractor's dry cask storage system Certificate of Compliance licensing basis documents).
4. Source document program and process for administering Site procedures
5. Testing program

F. Change Control

1. Changes to procedures and instructions shall be reviewed and approved prior to their implementation by the same organizations that performed the original review and approval, or by another organization assigned by appropriate management or designated in a controlling procedure or instruction.
2. Changes shall be reviewed by organizations having access to pertinent background information upon which to base their approval and having adequate understanding of the requirements and intent of the original document.
3. Minor changes, such as inconsequential editorial corrections that do not affect the outcome, results, functions, processes, responsibilities, and requirements of the performance of procedures or instructions, do not require the same review as the original, but shall be reviewed and approved as defined in controlling documents.

6.1.3 Responsibilities

- A. The management position responsible for operations support is responsible for the development of programs to control procedures and instructions. The program elements in Section 6.1.2 and the related source requirements contained within the documents listed in Section 6.1.4 shall be addressed.

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6.1.3 Responsibilities (continued)

B. The General Manager, QA, shall:

1. Perform reviews or assessments of TVA Nuclear NPS documents that implement the NQAP and,
2. Verify through assessing or other means that reviews are conducted by personnel knowledgeable in QA requirements.

C. Deleted.

D. TVA organizations that work directly under the TVA NQAP are responsible for:

1. Implementing the requirements of the QA program through written procedures and instructions.
2. Ensuring reviews of NPS documents that implement the NQAP are conducted by personnel knowledgeable of QA requirements.

6.1.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs for procedures and instructions.

6.2 Document Control

6.2.1 General

- A. The QA program requires that for activities affecting quality, measures shall be established to ensure that documents prescribing the activity, including changes, are approved for release by authorized personnel, reviewed for adequacy, and made available to personnel performing the prescribed activity prior to commencing work.
- B. The requirements of this section are applicable to the distribution and control of documents after they have been approved for use.

6.2.2 Program Elements

A. Identification and Distribution

1. The types of documents to be controlled shall be identified. Appendix H lists types of controlled documents and manuals.
2. Master document indexes shall be established and maintained for identifying all controlled documents and their revision status.
3. The distribution of documents shall be controlled and maintained to assist in preventing the use of obsolete or superseded documents.

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6.2.2 Program Elements (continued)

B. Controlled Use

1. Quality related activities shall be performed in accordance with approved and controlled instructions, procedures, and drawings.
2. Organizations shall ensure through procedures or instructions that those participating in an activity are made aware of and use proper and current documents.

C. Control of Equipment Technical Information

Administrative controls shall provide for control and distribution of equipment technical information (ETI) supplied to TVA.

6.2.3 Responsibilities

The management position responsible for nuclear engineering is responsible for the development of programs to control documents. The program elements in Section 6.2.2 of this section and the related source requirements contained within the documents listed in Section 6.2.4 shall be addressed.

6.2.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of documents.

6.3 QA Records

6.3.1 General

- A. The QA program established for the generation, collection, storage, maintenance, and retrieval of QA records requires that records be correctly identified, reviewed, stamped, or otherwise authenticated, retained, and retrievable without undue delay.
- B. The storage of quality assurance records in electronic media shall be consistent with the intent of Regulatory Issue Summary (RIS) 2000-18, dated October 23, 2000 and associated Nuclear Information and Records Management Association (NIRMA) Technical Guides (TGs): NIRMA TG 11-1998, NIRMA TG 15-1998, NIRMA TG 16-1998, and NIRMA TG 21-1998. The guidance of RIS 2000-18 should also be applied to the records keeping and maintenance requirements in other parts of the regulations that accept the storage of records in the form of electronic media.
- C. The use of optical disks for electronic records storage and retrieval systems shall comply with the NRC guidance in Generic Letter 88-18.

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6.3.2 Program Elements

- A. Sufficient records and documentation shall be prepared and maintained to provide evidence of the quality of items or activities affecting quality. QA records shall be legible, complete, and identifiable to the item involved.
- B. Design specifications, procurement documents, procedures, and instructions shall specify the QA records to be generated, supplied, and maintained by or for TVA. Retention times shall be designated. Indexes shall be established to designate those types of QA records to be maintained.
- C. Measures shall be established to maintain control of in process QA documents prior to their completion.
- D. Requirements and responsibilities shall be established consistent with applicable codes, standards, and procurement documents for record transmittal, receipt, retention, updating and supplementing of information, and maintenance of the records subsequent to the completion of work and record retrieval.
- E. Permanent and temporary QA record storage facilities shall be established to store QA records to prevent infestation, deterioration, or destruction.
- F. Measures shall be taken to preclude the entry of unauthorized personnel into QA record storage areas to ensure the integrity of the stored QA records.
- G. Records shall be maintained in a manner that will allow access by the Authorized Inspection Agency representative.

6.3.3 Responsibilities

The management position responsible for nuclear engineering is responsible for the development of a QA records program. The program elements in Section 6.3.2 and the related source requirements contained within the documents listed in Section 6.3.4 shall be addressed.

6.3.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of records.

7.0 DESIGN CONTROL

7.1 General

The QA program requires that measures shall be established and documented to ensure that applicable specified design requirements, such as design bases, regulatory requirements, and codes and standards, are correctly translated into specifications, drawings, procedures, or instructions.

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7.2 Program Elements

7.2.1 Basic

- A. Specific items, services, and activities subject to design control shall be identified (e.g., reactor physics analysis, stress and thermal analyses, computer code development and use, computer software, compatibility of materials, drawings, specifications, engineering procedures, and instructions).
- B. Design activities shall be documented in sufficient detail to permit verifications and audits.
- C. Measures shall be established and implemented to ensure that design output documents appropriately identify engineering requirements that apply to plant activities, and to ensure that plant personnel are made aware of engineering requirements that could affect the performance and scope of their responsibilities before those engineering requirements are implemented.
- D. Measures shall be established and implemented to provide test requirements in design output documents for the following tests as appropriate:
 - 1. Design qualification.
 - 2. Product acceptance (proof).
 - 3. Pre-operational.
 - 4. Construction.
 - 5. Start-up.
 - 6. Surveillance.
 - 7. Functional.
 - 8. Post-maintenance.
 - 9. Post-modification.
- E. Measures shall be established and implemented to provide documented input to other organizations which may request input for their special tests.
- F. Acceptance criteria shall be defined for verifications, inspections, and tests in appropriate design output documents.
- G. Design output documents shall be utilized, as appropriate, for procurement activities.
- H. The Q-List identified in Section 5.1C of this program description shall be developed using appropriate regulations, regulatory guides, and national codes and standards (such as 10 CFR 50, Appendix R; 10CFR50.48(c) Fire Protection, National Fire Protection Association Standard, NFPA 805; Regulatory Guides 1.26 and 1.29; and ASME Boiler and Pressure Vessel Code).

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7.2.1 Basic (continued)

- I. Measures shall be established to ensure the environmental qualification (EQ) of safety-related electrical and mechanical equipment is included, as appropriate, within the design basis.
- J. Errors and deficiencies in approved design documents, including design methods (such as described in calculations) that could affect quality-related activities are documented and corrected. (Reference Section 10.0 of this program description)

7.2.2 Design Inputs

- A. Design assumptions, design inputs, and deviations from approved design inputs shall be identified, reviewed, approved, and documented prior to declaring the structure, system, or component affected by the design operable.
- B. Design inputs shall be correctly translated into design outputs.
- C. Provisions shall be made to relate the final design to the source of design input.

7.2.3 Design Analysis

- A. The performance of design analysis shall be planned and controlled.
- B. The suitability of application of materials, parts, equipment, and processes essential to the function of a structure, system, or component shall be reviewed to ensure that functional requirements are met.

7.2.4 Interface Control

Internal and external design responsibilities and interface controls shall be established and defined to facilitate the preparation, review, approval, release, distribution, and revision of documents involving design interfaces. This process ensures that quality-related structures, systems, and components are compatible geometrically, functionally, and with plant processes and environments.

7.2.5 Design Output

- A. Engineering requirements on plant activities (e.g., operation, maintenance, installation, modification, surveillance) shall be identified in design output documents.
- B. Measures shall be established and documented to control the preparation, review, approval, issuance, and revision of design output documents. These measures shall include criteria and responsibilities to ensure that adequate technical and quality requirements are incorporated prior to issuance.
- C. Drawings and specifications shall include, as appropriate, quantitative and qualitative acceptance criteria. These acceptance criteria shall be sufficient for determining that quality-related activities have been satisfactorily accomplished.
- D. Drawings and specifications shall receive documented reviews and approvals (and concurrences as required) by responsible organizations prior to use.

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7.2.5 Design Output (continued)

- E. After approval, drawings shall be controlled in accordance with the requirements of Sections 6.2 and 6.3 of this program description.
- F. Revisions shall be reviewed and approved by the same organizations that performed the original review unless another appropriate organization that has access to pertinent background information is designated in the appropriate NPS document or procurement documents.

7.2.6 Design Verification

- A. The translation of design inputs into design documents shall be verified and the verification documented.
- B. Criteria for determining design verification methods shall be established, identified, implemented, and procedurally controlled. The responsibilities of the verifier, the areas and features to be verified, and documentation requirements shall be included.
- C. Design verification shall be performed by individuals or groups other than those who performed the original design.
- D. For nuclear units under a construction permit, design verification shall be complete prior to initial fuel loading.
- E. For operating nuclear units, design verification shall be complete prior to reliance upon the component, system, or structure to perform its function. Design outputs which are released prior to verification being completed shall be identified and tracked to ensure the component, system, or structure is not relied upon to perform its function until the verification is complete.
- F. When a verification test is used to verify the adequacy of a specific design feature in lieu of other verifying processes, the test shall include suitable qualification testing of a prototype unit under conditions that simulate, to the extent practical, the most adverse design condition. The prototype, component, and feature tests are performed as early as possible and prior to plant installation of the equipment or at least prior to the point where installation of the item would be relied upon to perform its function. In those cases where the most adverse design conditions cannot be achieved in tests, suitable analysis shall be performed to extrapolate test results to design conditions.

7.2.7 Design Changes

- A. Design changes, including field changes and modifications, shall be identified. They are subject to design control measures commensurate with or better than those applied to the original design.
- B. Design changes shall be reviewed and approved by the organization responsible for the original design unless another appropriate organization that has access to pertinent background information is designated in the appropriate NPS document or procurement documents.

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7.2.7 Design Changes (continued)

- C. Design changes that affect the supply of a quality-related item or service controlled by procurement documents shall not be returned to operation until: (1) the change is reflected in the appropriate change document such as a contract or purchase order change notice, (2) the change document has received the requisite reviews and approvals, and (3) the change document has been submitted to and accepted by the respective supplier.
- D. Proposed modifications to quality-related structures, systems, and components shall be reviewed, approved, and controlled in accordance with applicable requirements of the appropriate license and Section 9.9 of this Program. Design modifications shall be at least equivalent to the quality specified in the latest approved design basis.
- E. Measures to control plant configuration and ensure that the actual plant configuration is accurately depicted on drawings and other appropriate design output documents and reconciled with the applicable design basis shall be established, documented, and implemented.
- F. The design integrity shall be maintained during plant maintenance and modification processes, including temporary changes, and throughout the life of the plant.

7.3 Responsibilities

- A. The management position responsible for nuclear engineering is responsible for the development of a design control program. The program elements in Section 7.2 and the related source requirements contained within the documents listed in Section 7.4 shall be addressed. This management position is also responsible for implementation of programs for maintaining design control at licensed units and corporate.
- B. The management position responsible for BLN Project is responsible for implementation of programs for maintaining design control at BLN 1 & 2.
- C. The management position responsible for SMR Project Engineering is responsible for implementation of programs for maintaining design control for CRN.

7.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls which must be addressed in the development of programs and procedures for control of the design process.

8.0 PROCUREMENT AND MATERIAL CONTROL

8.1 Procurement Document Control

8.1.1 General

The QA program requires that measures shall be established to ensure that control is applied to documents used to obtain materials, parts, components, spare and replacement parts, and services required to construct, test, modify, maintain, repair, or operate nuclear facilities, commensurate with their importance to safety.

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8.1.2 Program Elements

A. Procurement Document Planning

The procurement process, as documented in TVA Nuclear procedures, shall identify each activity in the process, who accomplishes the activity, how, and when the activity is performed. The process shall be planned to integrate the following activities as a minimum:

1. Document preparation, review, and change control.
2. Selection of procurement sources.
3. Bid evaluations and award.
4. Purchaser control of supplier performance.
5. Verification activities of purchaser.
6. Control of non-conformances.
7. Corrective actions.
8. Acceptance of item or service.
9. QA records.
10. Audit of procurement program.

B. Procurement Document Content

In the preparation of procurement documents, responsible organizations shall as applicable:

1. Specify or reference applicable design basis technical requirements as defined by Engineering, such as regulatory requirements (including 10 CFR 50.49 and 10 CFR Part 21 as applicable); QA requirements; material and component identification requirements; drawings; specifications; inspection and test requirements (including acceptance criteria); calibration, handling, storage, packaging, and shipping requirements; and special process instructions. All technical requirements shall be prepared, reviewed, and released under the requirements established by Section 7.0 of this program description.
2. For commercial-grade replacement items intended for safety-related use, Engineering shall determine critical characteristics and specify inspection and acceptance criteria to ensure that items dedicated after receipt are acceptable for use as replacement parts.
3. As appropriate, require that suppliers have a documented QA program that is approved by TVA and appropriate interfaces established.
4. As appropriate, require that NQAP requirements be imposed on sub-vendors and subcontractors in sub-tier procurement documents.

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8.1.2 Program Elements (continued)

5. Identify the documentation to be prepared and/or maintained by the supplier and submitted to TVA for review and approval.
6. Identify records to be retained, maintained, and controlled by the vendor or contractor, and those documents and records that the vendors or contractors shall transfer to TVA prior to installation or use of an item or service as applicable.
7. Include provisions for right of access to the facilities and records of vendors, contractors, and sub-tier vendors and contractors for source surveillances and audits.
8. Include requirements as defined by Engineering to ensure that suitable spare and replacement materials and components are purchased to the applicable requirements of the NQAP and: (1) specifications and codes equivalent to those specified for the original equipment, or those specifications and codes specified by approved design output; or (2) in cases where the original item or part is found to be commercially "off the shelf" or without specifically identified quality assurance requirements, spare and replacement parts may be similarly procured but, at the very least, equivalent performance is ensured; or (3) in those where the QA requirements of the original item cannot be determined, a documented evaluation establishing the requirements and controls is conducted.
9. Include requirements for reporting non-conformances and for approving corrective actions and non-conformance dispositions.

C. Procurement Document Review and Approval

The review and approval of procurement documents shall include a documented review to ensure that technical, quality assurance, and administrative requirements are included in procurement documents prior to their use.

D. Procurement Document Change Control

Changes in procurement documents shall be subject to the same degree of control as was utilized in the original documents. Changes such as typographical corrections, quantity, or monetary changes do not require a review.

8.1.3 Responsibilities

- A. The management position responsible for procurement is responsible for the development of a procurement document control program. The program elements in Section 8.1.2 and the related source requirements contained within the documents listed in Section 8.1.4 shall be addressed.
- B. The management position responsible for procurement is responsible for implementation of programs for maintaining procurement document control.

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8.1.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for control of procurement documents.

8.2 Control of Purchased Material, Equipment, and Services

8.2.1 General

The QA program requires that measures shall be established to assure that purchased material, equipment, and services, whether purchased directly or through contractors, conform to the procurement documents.

8.2.2 Program Elements

A. Evaluation and Selection of Suppliers

1. Evaluations of prospective suppliers shall be conducted and documented to demonstrate that their qualifications and capabilities are adequate to meet procurement document requirements. Supplier evaluations shall include supplier performance assessments as appropriate.
2. Evaluations and selection of procurement sources shall include, as appropriate, the use of historical quality performance data, source surveys or audits, or source qualification programs.
3. A list of approved suppliers shall be maintained.

B. Bid Evaluation and Award

A documented system for reviewing and evaluating bids and correcting bid discrepancies shall be established to ensure suppliers' conformance to procurement document requirements.

C. Effectiveness Assessments

1. The effectiveness of the suppliers' control of quality shall be assessed through periodic audits and/or surveillances utilizing a graded approach consistent with the importance, complexity, and quantity of the items and services procured.
2. The assessments shall consist of, as appropriate, checks, reviews, verifications, examinations, and witnessing of activities related to the fabrication, testing, inspection, and shipment of material, including periodic assessments of suppliers' certificates of conformance.
3. Records, qualifications, and process specifications or procedures shall be documented and verified to be in accordance with contract requirements.

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8.2.2 Program Elements (continued)

D. Acceptance of Procured Services

Procured services shall be accepted, as appropriate, by:

1. Technical verification of product/data produced.
2. Assessments and/or audit of the activity.
3. Review of objective evidence such as certifications.

E. Acceptance of Procured Items

Procured items shall be accepted by receipt inspection and any combination of the following, as appropriate, based on the item's degree of complexity, uniqueness, and safety classification.

1. Source verification.
2. Pre-installation testing inspection.
3. Supplier certificate of conformance.
4. Post installation testing.

F. Receipt Inspection

1. Receipt inspection shall be performed utilizing graded approach criteria to ensure that material and equipment is properly identified to the purchase document and receiving documentation and meets requirements of procurement documents. When graded approach criteria are applied to receipt inspection activities, line verification will be required. The applicable QA organization shall independently verify line organization performance to ensure adequacy of line verifications.
2. Deficiencies, such as damage, shall be documented and resolution of the deficiency shall be in accordance with approved documents.
3. Records, such as inspection and test records, shall be available at the Site prior to installation or use of the material or equipment.

G. Maintaining Disposition of Received Items

1. A quality control method for identifying the status of items (e.g., an inventory system, tagging, labeling, and color code) shall be employed that indicates whether items received are acceptable or unacceptable for installation.
2. Items may be installed prior to final disposition of a deficiency. Non-conforming items shall be controlled in accordance with Section 10.2.1.

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8.2.3 Responsibilities

- A. The management position responsible for procurement is responsible for the development of programs to control purchased material, equipment, and services. The program elements in Section 8.2.2 and the related source requirements contained within the documents listed in Section 8.2.4 shall be addressed.
- B. The management position responsible for procurement is responsible for implementation of programs for maintaining control of purchased material, equipment, and services.
- C. The General Manager, QA, is responsible for evaluation and selection of suppliers, acceptance of procured items (as described in Section 9.1.2C), periodic assessments of suppliers utilizing graded approach criteria, and maintenance of an Acceptable Suppliers List (ASL).

8.2.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of purchased material, equipment, and services.

8.3 Identification and Control of Materials, Parts, and Components

8.3.1 General

The QA program shall ensure that only correct and accepted items are installed and used, and that an item can be related to applicable drawings, specifications, or technical documents at any stage of construction, maintenance, or modification as required.

8.3.2 Program Elements

A. Identification

Identification of quality-related items shall be verified and documented prior to release for fabrication, assembly, shipping, and installation. Identification requirements shall be specified in applicable design and procurement documents. Determination of identification requirements shall be based on the item importance to safety, quality, or potential hazards.

B. Traceability

Traceability of materials, parts, or components to specific manufacturing, installation, maintenance, and/or test records shall be provided as required by codes, standards, or specifications; and shall be accomplished through the recording of heat, batch, lot, part, or serial numbers, or other appropriate identification, either on the item or on records traceable to the item.

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8.3.3 Responsibilities

- A. The management position responsible for procurement is responsible for the development of the material management program for identification and control of materials, parts, and components. The program elements in Section 8.3.2 and the related source requirements contained within the documents listed in Section 8.3.4 shall be addressed.
- B. The management position responsible for procurement is responsible for implementation of programs for maintaining identification and control of materials, parts, and components.

8.3.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the identification and control of items.

9.0 CONTROL OF PLANT ACTIVITIES

9.1 Inspection and Line Verification

9.1.1 General

The QA program requires that inspection and line verification procedures and instructions include provisions for inspections and line verifications to ensure quality.

9.1.2 Program Elements

A. Line Verification

- 1. Line verifications shall be performed and documented to substantiate and ensure that an activity or condition has been implemented and accomplished in conformance with specific requirements.
- 2. Requirements for line verification identified by design output documents shall be included in implementing documents.
- 3. Qualification of personnel performing line verifications shall be contained in procedures and instructions developed by the organization performing the line verification and shall be in accordance with Regulatory Guide 1.8 as endorsed in Appendix B of this program description.

B. Inspection Plans and Instructions

Inspections shall be controlled by plans or instructions, which implement requirements, assign responsibilities, and identify acceptance criteria derived from design output documents as appropriate.

- 1. Inspections to verify conformance to codes, standards, and design output shall be required for each operation. Factors used to determine the extent of inspections to be performed are listed in Section 5.2 of this NQAP.

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9.1.2 Program Elements (continued)

2. Inspection hold points, witness points, and notification points shall be used as required or needed to verify in-process or final achievement of quality. When graded approach criteria are applied to design/regulatory required inspection activities, line verification will be required. The QA organization shall independently verify line organization performance to ensure adequacy of line verifications.
3. Indirect control by assessment of processing methods, equipment, and personnel shall be specified when direct inspection is impossible or disadvantageous.
4. Instructions for activities such as sampling, assessments, and independent inspections shall be included.
5. Persons responsible for performing sampling, assessments, and independent inspections shall be specified.

C. Inspection Performance

Inspections shall be performed by QA or other qualified individuals approved by QA utilizing graded approach criteria in accordance with controlled plans or instructions which specify attributes to be verified in accordance with requirements and acceptance criteria.

1. Inspections shall be performed by individuals delineated above other than those who performed or directly supervised the activity being inspected.
2. Personnel performing inspections shall be trained, qualified, and certified, as required, within their discipline in accordance with established requirements. The requirements criteria shall be approved by QA.
3. Measuring and test equipment (M&TE) used to perform inspections shall be controlled, calibrated, and maintained as required in Section 9.5 of this program description. The identification of M&TE shall be documented.
4. Work shall not proceed beyond designated hold points prior to release by authorized personnel.

D. Results

Records of inspection results and personnel performing the inspection shall be retained as required in Section 6.3 of this program description.

1. Inspection records shall be identified as such and shall be retrievable.
2. Inspection records shall contain a description of the type of inspection, the date performed, inspection or verification of corrective action results, and identification of the inspector and data recorder as well as the person approving the inspection results including the date of approval.

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9.1.2 Program Elements (continued)

3. Inspection records and/or data sheets shall include a statement attesting to the acceptability of results and provide for identifying the individual who performed the evaluation.
4. Periodic trending of inspection results shall be performed and reported to appropriate management.
5. Records shall be kept in sufficient detail to permit adequate evaluation of inspection activities.

9.1.3 Responsibilities

- A. The management position responsible for inspection, testing, monitoring and analysis, and the General Manager, QA are responsible for including the applicable QA program elements in Section 9.1.2 and the related source requirements found in the documents listed in Section 9.1.4, within the inspection program. The General Manager, QA reviews and approves the inspection program to ensure inclusion of QA requirements for their respective site.
- B. The management position responsible for inspection, testing, monitoring and analysis, and the Senior Vice President, Nuclear Engineering and Operations Support are responsible for including the program elements in Section 9.1.2 and the related source requirements contained within the documents listed in Section 9.1.4, as applicable, within the line verification program.
- C. The management position responsible for nuclear engineering is responsible for providing qualitative / quantitative criteria in design output documents, which are incorporated in implementing procedures.
- D. For BLN 1 & 2, the management position responsible for BLN Project is responsible for providing qualitative / quantitative criteria in design output documents, which are incorporated in implementing procedures.
- E. For CRN, the management position responsible for SMR Project Engineering is responsible for providing qualitative / quantitative criteria in design output documents, which are incorporated in implementing procedures.
- F. The General Manager, QA is responsible for establishing and implementing programs for training and certification of personnel performing QC activities.

9.1.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for inspection.

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9.2 Quality Assurance Assessments

9.2.1 General

Assessments by QA are performed as a type of verification to ensure that observed quality-related activities are performed in accordance with requirements and desired results are achieved.

9.2.2 Program Elements

- A. Assessment procedures and instructions shall address assessment techniques.
- B. Assessment frequencies shall be based on such factors as the status and safety significance of the activity or process, frequency of occurrence, degree and acceptability of previous experience, adverse trends, and testing or operation sequences.
- C. The results of assessments shall be documented and reported to appropriate levels of management.
- D. Records shall be maintained in sufficient detail to provide adequate documentation of assessed activities.
- E. Follow up verifications or additional assessments shall be conducted as necessary to ensure that required corrective action has been taken.
- F. Assessments shall be performed in accordance with written procedures and instructions by qualified and appropriately trained personnel not having direct responsibility in the areas being assessed.

9.2.3 Responsibilities

The General Manager, QA, is responsible for the development and implementation of the QA assessment program.

9.2.4 Source Requirement Documents

None applicable.

9.2.5 Units with Construction Permits

For units with construction permits, refer to Appendix G.

9.3 Control of Special Processes

9.3.1 General

Those processes, as determined by the Engineering organization, which by their nature make a direct inspection either impossible or disadvantageous, are controlled as special processes.

Special processes shall be controlled and accomplished in accordance with approved process control documents by qualified personnel using qualified written procedures.

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9.3.2 Program Elements

- A. Processes, which are to be controlled, as special processes, shall be documented in design output documents and maintained current. These processes shall include, but not be limited to welding, forming and bending, heat treating, chemical cleaning, protective coatings, and NDE.
- B. Measures shall be established, documented, and implemented, as appropriate, using specifications, procedures, and instructions to ensure that special processes are accomplished under controlled conditions and in accordance with applicable codes, standards, specifications, manufacturer instructions, or other special requirements. These measures shall include requirements for procedures, equipment, personnel, specifications, and control of consumable materials.
- C. When a special process is not covered by existing codes or standards, or when an item's quality requirements exceed the requirements of existing codes or standards, any special requirements necessary for controlling, implementing, and documenting the special process shall be defined as appropriate.
- D. Procedure, Equipment, and Personnel Qualification and Certification
 - 1. Personnel performing special processes shall be qualified and, when required, certified in accordance with the applicable codes, standards, and any special requirements.
 - 2. Qualification or certification of procedures, equipment, and personnel required by codes, standards, or any special requirements shall be performed.
 - 3. Documentation shall be maintained for these qualifications and certifications. M&TE used in special processes shall be controlled in accordance with Section 9.5 of this program description.
- E. Results

Results of examinations associated with special processes shall be documented and evaluated for acceptability. Documentation shall provide for identifying the individual who performed the evaluation.

9.3.3 Responsibilities

- A. The management position responsible for nuclear engineering is responsible for development of programs for control of special processes. The program elements in Section 9.3.2 and the related source requirements contained within the documents listed in Section 9.3.4 shall be addressed.
- B. The management position responsible for Inspection Services Organization (ISO) is responsible for interpretation of NDE results when not achievable at the site level, and development and implementation of NDE methods and procedures. The management position responsible for ISO is also responsible for the qualification or certification of ISO NDE procedures, equipment, and personnel.
- C. Deleted

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9.3.3 Responsibilities (continued)

- D. The management position responsible for BLN Project has the responsibility for developing and implementing the NDE Program for ASME Section III work (when active) at BLN 1 & 2. (See also Appendix G.)
- E. The General Manager, QA, reviews and approves the inspection program for control of special processes to ensure inclusion of QA requirements and is also responsible for the development of upper tier QA requirements for the NDE program for licensed units (refer to Section 9.3.2). For construction NDE activities, refer to Appendix G.
- F. The management position responsible for nuclear engineering is responsible for coordinating with appropriate organizations and determining which processes are to be controlled as special processes and for developing engineering requirements for NDE.
- G. The management position responsible for nuclear engineering is responsible for the qualification or certification of TVA Nuclear special process procedures, equipment, and personnel for all areas other than NDE.

9.3.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of special processes.

9.4 Test Control

9.4.1 General

The QA program requires that controls shall be established to ensure that required testing is identified and performed in accordance with procedures, which incorporate engineering requirements.

9.4.2 Program Elements

- A. The following types of tests, as a minimum, shall be included:
 - 1. Design qualification tests.
 - 2. Product acceptance (proof) tests prior to installation.
 - 3. Pre-operational tests.
 - 4. Construction tests.
 - 5. Start-up tests.
 - 6. Surveillance tests.
 - 7. Functional tests.
 - 8. Post maintenance tests.

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9.4.2 Program Elements (continued)

9. Post modification tests.

10. Special tests.

B. Test Performance

1. Tests shall be accomplished in accordance with written and approved test procedures which include the requirements and acceptance criteria of technical specifications, drawings, specifications, codes, standards, regulatory requirements, and scoping documents as applicable.
2. Tests performed following plant repairs, replacements, maintenance, or modifications shall be conducted in accordance with the original design and testing requirements or approved documented alternatives. Tests shall be sufficient to confirm that the changes produce expected results and do not reduce safety of operations.
3. Test procedures or instructions include the following, as applicable:
 - a. Description of test objective.
 - b. Instructions for performing the test.
 - c. Test prerequisites such as calibrated instrumentation, adequate test equipment and instrumentation including their accuracy requirements, completeness of the item to be tested, suitable and controlled environmental conditions, provisions for data collection and storage, and qualified personnel.
 - d. Provisions to assure test prerequisites have been met.
 - e. Mandatory inspection hold points.
 - f. Acceptance or rejection criteria.
 - g. Methods of recording, documenting, and reviewing test data and results.
 - h. Provisions for assuring that adverse conditions are corrected, or are evaluated and determined not to adversely impact testing, prior to the initiation of pre-operational testing of the affected item.

C. Test Results

Test results shall be documented in a suitable test results package that contains:

1. The identification of the item to which it applies.
2. The identification of instructions followed in performing the test.
3. Pertinent inspection and test data.

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9.4.2 Program Elements (continued)

4. Significant dates and times.
5. Signature of inspector or tester.
6. Conditions encountered which were not anticipated, including identification of deviations or adverse conditions, and actions taken to resolve the condition.

D. Results Evaluation

The technical acceptability of the results shall be evaluated by an appropriate authority to ensure that the test requirements have been satisfied.

- E. Records of test results shall be retained in accordance with Section 6.3 of this program description.

9.4.3 Responsibilities

- A. The management position responsible for nuclear engineering is responsible for the development of test control programs. The program elements in Section 9.4.2 and the related source requirements contained within the documents listed in Section 9.4.4 shall be addressed.
- B. The management position responsible for a nuclear site, (delegated to the management position responsible for site engineering) is responsible for reviewing test results and specifying through design output documents the acceptance criteria for tests necessary to demonstrate an item's compliance with design parameters for initial acceptance and major modifications for licensed units.
- C. Deleted
- D. The management position responsible for a nuclear site, (delegated to the management position responsible for site engineering) is responsible for the development of tests (startup and operations phase) which incorporate engineering requirements and for the conduct of tests, including leak tests (operations phase). He is also responsible for documenting, evaluating, and determining acceptability of test results.
- E. The General Manager, QA, is responsible for oversight of the test control program (i.e., test performance, test results and acceptability of tests).
- F. Deleted

9.4.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this Program. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of tests.

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9.5 Control of M&TE and Installed Safety-Related I&C Devices

9.5.1 General

Measures shall be established to control equipment, which is used to conduct measurements or tests related to determining the functionality or quality of structures, systems, and components within the scope of the QA program.

9.5.2 Program Elements

A. Requirements Common to M&TE and Installed Safety-Related I&C Devices

1. Procedures or instructions for administrative controls shall establish:
 - a. Controls for calibration, selection, identification, and utilization of M&TE and installed safety-related I&C devices.
 - b. The scope of the various safety-related calibration and control programs.
 - c. The types of equipment to be controlled.
2. Calibration procedures and instructions, as a minimum, shall include:
 - a. The identity of the item to be calibrated.
 - b. Calibration equipment and reference standards to be used.
 - c. Checks, tests, measurements, and acceptance tolerances.
 - d. Sequence of operations.
 - e. Special instructions when necessary.
 - f. Recording of performer and applicable procedure or instruction.
 - g. Recording of as found and as left data.
3. Intervals shall be established for calibration and adjustments of M&TE and installed safety related I&C devices. These intervals shall be based on required accuracy, purpose, degree of usage, stability characteristics, and other conditions which may affect the measurement or output data.
4. An index, listing, or log shall be procedurally maintained; and shall identify each piece of M&TE and installed safety-related I&C device within the calibration program.
5. Reference standards shall be traceable to nationally recognized standards or physical constants. When national standards do not exist, the basis for calibration shall be documented and approved by designated responsible management.
6. Prior to use, M&TE and installed safety-related I&C devices shall be identifiable and traceable to applicable calibration records.

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9.5.2 Program Elements (continued)

B. Unique Requirements for M&TE

Controls for M&TE shall include the following requirements. These requirements are in addition to those noted in Section 9.5.2A.

1. M&TE shall be stored, calibrated, and used in environments that will not adversely affect its accuracy.
2. M&TE shall be identified to indicate the date of the last calibration, by whom it was calibrated, and when the next calibration is due.
3. Methods shall be established to identify previous usage of M&TE when found to be out of calibration. These methods shall require that inspections or tests be repeated or a documented evaluation be performed when the integrity of past measurements obtained with the suspect equipment or device cannot be demonstrated.
4. Calibration standards, including test stands that are used as a standard (i.e., multiple M&TE) shall have an accuracy of at least four times the required accuracy of the equipment being calibrated. When this is not possible, standards shall have an accuracy that ensures the equipment being calibrated will be within required tolerances. The basis of acceptance shall be documented and authorized by identified responsible management.
5. M&TE shall be conspicuously labeled, tagged, or otherwise controlled to ensure performance of required calibrations on or before the established due date.
6. M&TE which are consistently found out of calibration shall be identified as non-conforming, removed from service, and repaired or replaced.

C. Unique Requirements for Installed Safety-related I&C Devices

Controls for installed safety-related I&C devices shall include the following requirements. These requirements are in addition to those noted in Section 9.5.2A.

1. The calibration of installed safety-related I&C devices that provide final measurements data or controls shall be against M&TE that have an accuracy equal to or better than the required accuracy of the devices being calibrated.
2. Installed safety-related I&C devices shall be controlled to ensure performance of required periodic calibrations.
3. Environmental qualification controls for 10 CFR 50.49 installed safety-related I&C devices shall be established in applicable design documents. These controls shall be maintained when installed safety-related I&C devices are opened in place or removed for calibration in a laboratory.
4. Installed safety-related I&C devices which are consistently found to be out of calibration shall be identified and repaired or replaced.

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9.5.2 Program Elements (continued)

D. Unique Requirements for Installed Compliance I&C Devices

Controls for installed compliance I&C devices shall include the following requirements. These requirements are in addition to those noted in Sections 9.5.2A and 9.5.2C.

1. Methods shall be established to identify previous usage of installed compliance I&C devices when found to be out of calibration. These methods shall require that inspections or tests be repeated or a documented evaluation be performed when the integrity of past measurements obtained with the suspect equipment or device cannot be demonstrated.

9.5.3 Responsibilities

- A. The management position responsible for a nuclear site is responsible for the development of controls for M&TE and installed safety-related I&C devices. The program elements in Section 9.5.2 and the related source requirements contained within the documents listed in Section 9.5.4 shall be addressed.
- B. For BLN 1 & 2, the management position responsible for BLN Project is responsible for the development of controls for M&TE and installed safety related I&C devices. The program elements in Section 9.5.2 and the related source requirements contained within the documents listed in Section 9.5.4 shall be addressed.
- C. The management position responsible for a nuclear site, (delegated to the management position responsible for site engineering) is responsible for providing qualitative/quantitative criteria in design output documents for licensed plants.
- D. For BLN 1 & 2, the responsibility for providing qualitative / quantitative criteria in design output documents is assigned to the management position responsible for BLN Project.
- E. For CRN, the responsibility for providing qualitative / quantitative criteria in design output documents is assigned to the management position responsible for SMR Project Engineering.

9.5.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls which must be addressed in the development of programs and procedures for the control of M&TE and installed safety-related I&C devices.

9.6 Handling, Storage, and Shipping

9.6.1 General

Measures shall be established such that items, including consumables, under the scope of the QA program are handled, stored, and shipped by qualified individuals in a manner to prevent deterioration, contamination, damage, or loss of identification in accordance with approved engineering and procurement documents.

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9.6.2 Program Elements

A. Marking

Items and/or their containers shall be adequately marked so that the items may be properly identified, maintained, and preserved during shipping, receiving, and storage. Marking shall also indicate the presence of special environments or the need for special controls.

B. Packaging and Cleaning

1. Packaging shall be adequate to provide protection against effects such as corrosion and contamination, which would lower the quality of items or cause deterioration beyond specified limits.
2. Special coverings, special equipment, and special protective environments shall be provided and maintained, as required, by procurement documents and vendor instructions determined to be applicable by the responsible engineer.
3. Cleaning operations shall be performed, as required, prior to coating, packaging, storing, or installing items.

C. Shipping and Handling

Special protection required for shipping shall be provided and maintained, as specified, by procurement documents or vendor instructions. Specified instructions and precautions for handling shall be followed.

D. Storage

1. Methods of controlling stored items, including shelf life, shall be established to minimize the potential for damage or deterioration during storage.
2. Appropriate facilities shall be provided for storage of items requiring special environmental conditions.
3. Periodic assessments of storage areas and stored items shall be performed and documented to verify compliance with storage requirements.
4. Proper maintenance shall be provided for stored items, where necessary to prevent deterioration.

9.6.3 Responsibilities

- A. The management position responsible for procurement is responsible for the development of program controls for handling, storing, and shipping. The program elements in Section 9.6.2 and the related source requirements contained within the documents listed in Section 9.6.4 shall be addressed.
- B. The management position responsible for procurement is responsible for implementation of programs for handling, storage, shipping, and issuance of materials.

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9.6.3 Responsibilities (continued)

- C. The management position responsible for nuclear engineering is responsible for establishing storage, handling, and shipping requirements and preventive maintenance requirements during storage.

9.6.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of handling, storage, shipping, cleaning, and preservation of items.

9.7 Inspection, Test, and Operating Status

9.7.1 General

Measures shall be established and documented to ensure that the operating status is current and the acceptability of items is known throughout fabrication, storage, construction, installation, operation, maintenance, and modification.

9.7.2 Program Elements

A. Inspection and Test Status

1. The status of inspections and tests shall be identified either on the items or in documents traceable to the items to ensure that required inspections and tests are performed and to preclude inadvertent bypassing.
2. The status of inspections and tests shall be maintained through the use of indicators such as tags, markings, shop travelers, routing cards, stamps, inspection records, or other suitable means.
3. The authority for application and removal of tags, markings, labels, and stamps shall be specified.
4. Deletions or alterations of required inspections, tests, and other critical operations shall be controlled through appropriate changes to applicable procedures. These changes shall be handled in accordance with Section 6.1.2F of this program description.

B. Operating Status

1. The operating status of items (including temporary alterations) shall be indicated by status indicators such as tags on valves and switches to prevent inadvertent operation.
2. Plant instructions that require items to be removed from service for maintenance, testing, or modification shall require designated personnel permission and the completion of the appropriate clearance (hold order or approved plant procedures) before commencement of the activity.

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9.7.3 Responsibilities

- A. The management position responsible for a nuclear site is responsible for the development of controls to maintain inspection, test, and operating status. The program elements in Section 9.7.2 and the related source requirements contained within the documents listed in Section 9.7.4 shall be addressed.
- B. The management position responsible for a nuclear site, (delegated to the management position responsible for site engineering) is responsible for establishing applicable inspection and test acceptance criteria to ensure the acceptability of items is maintained.
- C. Deleted
- D. The management position responsible for BLN Project is responsible for the implementation of programs for maintaining inspection, test, and system status for BLN 1 & 2 construction permit activities (when active).
- E. The management position responsible for a nuclear site is responsible for the implementation of programs for maintaining inspection, test, and operating status at licensed units.

9.7.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of inspection, test, and operating status.

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9.8 Control of Maintenance

9.8.1 General

The nuclear maintenance program, including corrective and preventive maintenance, shall ensure that quality-related structures, systems, and components are maintained (including appropriate equipment qualification maintenance) at a level sufficient to perform their intended functions.

9.8.2 Program Elements

A. Preventive Maintenance

A preventive maintenance program prescribing the frequency and type of maintenance activities to be performed shall be established and maintained.

B. Procedures and Instructions

Maintenance shall be carried out in accordance with procedures or instructions to ensure quality at least equivalent to that specified in the approved design basis or approved alternatives. Procedures or instructions shall be written to the level of detail that is normally expected of the user group. Training, experience, and the technical complexity of the work are factors which should be considered in determining the level of detail the procedure or instruction should contain. Guidelines shall be established for the use of these procedures or instructions.

C. Maintenance Preplanning

Maintenance shall be preplanned to include as appropriate:

1. Review of work-initiating documents to ensure quality requirements have been addressed.
2. Evaluation of the use of special processes, equipment, and materials including potential hazards to personnel and equipment and ALARA considerations.
3. The potential for common-mode failures when working on similar multiple or redundant systems and components.
4. Documented approval by designated personnel to release equipment or systems for maintenance.
5. Inspection and testing, as appropriate, to ensure a suitable level of confidence. This includes post maintenance testing commensurate with the maintenance performed to ensure that the equipment is capable of being returned to service, that the original deficiency (if any exists) has been corrected, and that no new deficiency has been created.

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9.8.2 Program Elements (continued)

D. Malfunctions

The cause of malfunctions shall be evaluated and documented in accordance with TVA's nuclear corrective action program.

E. Trending

The Maintenance Program shall establish the parameters for trending maintenance activities and describe the methods for evaluating and documenting adverse trends.

9.8.3 Responsibilities

- A. The management position responsible for a nuclear site is responsible for the development of the nuclear maintenance program. The program elements in Section 9.8.2 and the related source requirements contained within the documents listed in Section 9.8.4 shall be addressed.
- B. Deleted
- C. The management position responsible for BLN Project is responsible for the implementation of the nuclear maintenance program during construction phase activities for BLN 1 & 2.
- D. The management position responsible for a nuclear site is responsible for the implementation of the nuclear maintenance program during operations phase activities.

9.8.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the Nuclear Maintenance Program.

9.9 Plant Reviews

9.9.1 General

- A. The plant staff organization provides reviews of day-to-day activities to ensure they are conducted in a safe manner. Qualified Reviewers provide for reviews of procedures, procedure changes, and proposed changes to structures, systems, and components that affect nuclear safety in their area of expertise.
- B. The Plant Operations Review Committee (PORC) is a multi-disciplined committee responsible for providing an oversight review of documents required for the safe operation of the plant. The PORC advises the management position responsible for plant operations on matters related to nuclear safety.

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9.9.2 Plant Reviews

A. Activities which affect nuclear safety shall be conducted as follows:

1. Proposed changes or modifications to plant nuclear safety-related structures, systems, and components shall be reviewed in accordance with approved written procedures. Such modifications shall be reviewed by an individual/group other than the individual/group which designed the modification, but who may be from the same organization as the individual/group, which designed the modification. Proposed modifications to plant nuclear safety-related structures, systems, and components shall be approved by the manager responsible for plant operations, or designee, prior to implementation.
2. Written procedures shall be established, implemented, and maintained covering the following activities:
 - a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978 and in accordance with Appendix B of this program description;
 - b. The emergency operating procedures which implement NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
 - c. Security Plan implementation;
 - d. Radiological Emergency Plan Implementation;
 - e. Offsite Dose Calculation Manual implementation;
 - f. Fire Protection Program Implementation;
 - g. Radiation Protection Program;
 - h. Process Control Program Implementation (radwaste packaging and shipping);
 - i. In Plant Radiation Monitoring;
 - j. Quality Assurance Program for effluent and environmental monitoring, using the guidance contained in Regulatory Guide 4.15, December 1977, Regulatory Guide 1.21, Revision 1, 1974 and Regulatory Guide 4.1, Revision 1, 1975;
 - k. ISFSI activities as required by 10 CFR 72; and
 - l. Cyber Security Plan implementation.

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9.9.2 Plant Reviews (continued)

3. Procedures required by Section 9.9.2A.2, procedures and programs required by site-specific technical specifications, other procedures which affect plant nuclear safety, and changes (other than editorial or typographical changes) thereto, shall be prepared and reviewed in accordance with approved administrative procedures prior to implementation except as specified in Section 9.9.2A.6.

Procedures or procedure changes shall be reviewed by a qualified individual knowledgeable in the subject matter other than the preparer. The reviewer may be from the same or different organization. Procedures not reviewed by PORC shall be approved by the responsible management in accordance with established program requirements. Procedures reviewed by PORC shall be approved by the manager responsible for plant operations, or designee.

4. Qualified Reviewers responsible for reviews performed in accordance with Section 9.9.2A.3 shall be designated and qualified. Qualifications of qualified reviewers shall be as specified in written procedures. Such reviews shall include a determination of whether additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by review personnel of the appropriate discipline.
5. Procedures and intent changes to these procedures within the scope of 10 CFR 50.59 or 10 CFR 72.48 shall be reviewed to determine whether a license amendment is required.
6. Temporarily approved changes to procedures of Section 9.9.2A.2 shall be made in accordance with ANSI N18.7-1976/ANS 3.2, as modified in Appendix B of this program description. Such changes shall be documented, reviewed, and approved in accordance with Sections 9.9.2A.3 and 9.9.2A.4 within 14 days and in accordance with approved administrative procedures.

B. Plant Operations Review Committee (PORC)

Each plant shall have a PORC which shall function to advise the management position responsible for plant operations in matters related to nuclear safety. This advisory function shall be performed by the PORC acting in a formal meeting periodically and as situations demand. PORC shall be organized, and conduct business as described below. The Chairperson and members shall be appointed in writing by the management position responsible for plant operations. PORC members shall meet the experience requirements of ANSI N18.1-1971 and ANSI/ANS 3.1-1981 as endorsed by Regulatory Guide 1.8, Revision 2, April 1987, "Qualification and Training of Personnel for Nuclear Power Plants," as outlined in Appendix B of this program description. This applies to the correlated ANSI N18.1-1971 and ANSI/ANS 3.1-1981 Manager or Supervisor position for the represented organization. (Operations representatives who hold or who have held SRO licenses at the station are considered qualified.)

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9.9.2 Plant Reviews (continued)

1. Composition

The composition of PORC shall be as follows:

Chairperson:	Director, Operations
Member:	operations representative(s)
Member:	maintenance representative(s)
Member:	chemistry control representative(s)
Member:	radiological protection representative(s)
Member:	engineering representative(s)

2. Alternates

Alternate chairpersons and members shall be appointed in writing by the management position responsible for plant operations.

3. Meeting Frequency

The PORC shall meet at least once per calendar month and as convened by the PORC Chairperson or designated alternate.

4. Quorum

The PORC shall consist of the chairperson or designated alternate and three of the five functional area representatives.

5. Reporting

The PORC reports to the management position responsible for plant operations on its activities and findings. The meeting minutes shall serve as the official correspondence from PORC to the management position responsible for plant operations. PORC recommendations shall be recorded in the minutes and submitted to the management position responsible for plant operations.

6. Functions

- a. Advise the management position responsible for plant operations on matters related to nuclear safety;
- b. Recommend to the management position responsible for plant operations approval or disapproval of items considered under Section 9.9.2B.7; and
- c. Provide written notification to the management position responsible for a nuclear site and the NSRB of safety-significant disagreements between the PORC and the management position responsible for plant operations within 24 hours. The management position responsible for plant operations shall have responsibility for resolution of such disagreements.

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9.9.2 Plant Reviews (continued)

7. Responsibilities

The PORC shall be used to conduct, as a minimum, reviews of the following. The PORC may delegate the performance of reviews, but shall maintain cognizance over and responsibility for them, e.g., subcommittees.

- a. New procedures or changes to existing procedures recommended by Regulatory Guide 1.33, Revision 2, Appendix A, February 1978; that require an evaluation in accordance with 10 CFR 50.59.
- b. The emergency operating procedures which implement NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
- c. Physical Security Plan;
- d. Radiological Emergency Plan;
- e. Offsite Dose Calculation Manual;
- f. Process Control Program (radwaste packaging and shipping);
- g. Additional PORC reviews specifically required by site-specific technical specifications or the plant's licensing basis;
- h. Proposed changes to TS; Technical Requirements Manual; their bases; amendments to the Operating License;
- i. Selected 10 CFR 50.59 evaluations;
- j. Selected 10 CFR 72.48 evaluations; and
- k. Cyber Security Plan.

9.9.3 Records

The PORC shall maintain written minutes of PORC meetings that, at a minimum, document the results of its activities. Copies shall be provided to the management position responsible for a nuclear site. At a minimum, the PORC minutes shall include results of the activities conducted under the provisions of Section 9.9.

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10.0 ADVERSE CONDITIONS

10.1 General

Measures shall be established to ensure that items that do not conform to requirements are controlled to prevent their inadvertent installation or use. Adverse conditions, including non-conforming items or non-hardware problems such as failure to comply with operating license, technical specifications, or procedures, shall be identified, evaluated, corrected, tracked, trended, and when required, reported to appropriate levels of management. Procedures or instructions implementing the corrective action program shall establish the criteria for documenting and tracking adverse conditions.

10.2 Program Elements

10.2.1 Control of Non-conforming Items

- A. Organizations responsible for items determined to be non-conforming during receipt inspection, construction, maintenance, modifications, or operations shall identify (physical identification) and segregate the non-conforming items from acceptable items to prevent further processing, delivery, installation, or inadvertent use. When segregation is not practical, tagging, marking or other means of identification is acceptable.
- B. In cases where a non-conforming item is needed for use prior to correcting the non-conformance, a conditional release request document is required. The conditional release request document requires appropriate reviews and approvals. In addition, for equipment to be energized, operated, or pressurized an evaluation and justification is required.

10.2.2 Corrective Action For Adverse Conditions

- A. TVA Nuclear and onsite non-nuclear service organizations performing quality-related activities at nuclear facilities shall promptly identify and resolve adverse conditions.
- B. Minor deficiencies, which may be brought into compliance within an acceptable timeframe, shall be corrected on the spot in accordance with established instructions.
- C. Adverse conditions shall be dispositioned by organizations with defined responsibility and authority; and shall be corrected in accordance with documented plans.
- D. Disposition actions for non-conforming items may be accept-as-is, repair, rework, scrap, or return to vendor. Dispositions of accept-as-is or repair shall be reviewed and approved by Corporate or Site Engineering. Reworked or repaired, and replaced items shall satisfy the original inspection and test requirements or acceptable alternatives.
- E. The cause of significant adverse conditions shall be determined and corrective action taken to preclude recurrence.
- F. Significant adverse conditions shall be reported to appropriate levels of management.
- G. The satisfactory completion of corrective actions shall be verified and documented by the appropriate organization.

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10.2.2 Corrective Action For Adverse Conditions (continued)

- H. Independent verification of corrective action implementation is performed as specified within the corrective action program.

10.2.3 Escalation of Adverse Conditions

Commensurate with their importance to quality or safety, adverse conditions which are not being effectively or timely resolved shall be escalated to appropriate levels of management in a timely manner.

10.2.4 Tracking

Procedures describing the corrective action program shall establish the requirements for those adverse conditions, which shall be tracked.

10.2.5 Quality Trend Analysis

Trend analysis shall be performed on adverse conditions and quality indicators associated with QA verification activities, through the periodic review and evaluation of CR data and other performance monitoring information as part of the corrective action program. Trend results shall be used to advise management of the quality status, identify adverse trends that need increased management attention, and compare quality of performance among organizations. The trend analysis program shall be described in procedures or instructions and shall include the following items as a minimum.

- A. Identify the quality indicators associated with QA verification activities to be trended.
- B. Specify the process of data handling such as gathering, collecting, sorting, grouping, and coding.
- C. Specify the process to be used in analyzing data and trend determination.
- D. Describe the actions to be taken when an adverse trend is identified.
- E. Describe the type, distribution, and frequency of issue of trend results reporting.

10.2.6 Stop Work

Work shall be stopped under any of the following conditions:

- A. Work is proceeding in violation of approved and controlling documents.
- B. A condition, which clearly indicates that cessation of an activity, is the only means available to protect the health and safety of the public and/or plant personnel.
- C. An activity, which if continued, will require extensive rework or repair for corrective action.
- D. An activity, which if continued, may jeopardize nuclear safety.
- E. A condition that represents continual failure to comply with technical or administrative controls.

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10.3 Responsibilities

- A. The management position responsible for operations support is responsible for the development, review and approval of the TVA Nuclear corrective action program. The program elements in Section 10.2 and the related source requirements contained within the documents listed in Section 10.4 shall be addressed.
- B. Deleted
- C. For the BLN project, the management position responsible for BLN Project is responsible for the development, review and approval of the corrective action program. The program elements in Section 10.2 and the related source requirements contained within the documents listed in Section 10.4 shall be addressed.
- D. Line managers are responsible to stop any work within their areas of responsibility when a continuation of activities could meet the criteria of Section 10.2.6
- E. QA is responsible to issue a formal Stop Work Order, as required, if a line manager fails to act on a stop work condition. Stop Work Orders shall remain in effect until proper evaluation can be made and adequate corrective action can be applied.
- F. The management position responsible for operations support is responsible to establish and maintain trend analysis procedures for adverse conditions and the quality indicators generated by QA verification activities such as audits, assessments, inspection, and vendor audits and surveillances. The General Manager, QA, is responsible for oversight and independent analysis of TVA Nuclear CAP trending.
- G. Deleted

10.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls which must be addressed in the development of programs and procedures for the corrective action program.

11.0 INDOCTRINATION, TRAINING, QUALIFICATION, AND CERTIFICATION

11.1 General

Personnel performing quality-related activities shall receive indoctrination and training, as necessary, to ensure that adequate proficiency is achieved and maintained.

11.2 Program Elements

11.2.1 Indoctrination and Training

- A. Personnel performing quality-related activities shall receive training related to administrative controls and the purpose, scope, and implementation of the NQAP.
- B. For personnel performing quality-related activities, proficiency shall be maintained and demonstrated through activities such as annual performance evaluation, retraining, reexamining, or recertifying.

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11.2.1 Indoctrination and Training (continued)

- C. Training of employees performing quality-related activities shall be conducted, as appropriate, when new programs or procedures affect the scope of their work and whenever changes in their duties or responsibilities occur.
- D. The scope, method, and objectives of formal training for quality-related activities shall be documented.
- E. Records documenting the date, attendance, content, instructor, and duration of training sessions shall be prepared and maintained to demonstrate individual qualification and training program implementation for employees performing quality-related activities.

11.2.2 Qualification and Certification

Qualification and certification programs shall be established and maintained to include the following:

- A. Certification of personnel, as needed, to perform inspections, tests, examinations, special processes, or lead audits prior to performance of the activity. Certifications shall delineate the functions personnel are qualified to perform and the criteria used for qualification.
- B. Personnel qualification criteria for applicable inspection, test, or examination techniques, audits, special processes, and capabilities necessary to perform the activity safely and in compliance with applicable requirements.
- C. A method to assess the performance of certified individuals and the qualifications of employees performing quality-related activities, to determine their initial and continued acceptability for performing their duties and to provide an assessment of the current level of qualification and certification.
- D. Development and maintenance of qualification and certification records and documents in accordance with applicable commitments and regulatory requirements.

11.3 Responsibilities

- A. The management position responsible for operations support is responsible for the development of the program for indoctrination and training.
- B. Other TVA Nuclear managers are responsible for delineating training requirements in their applicable areas of responsibility and providing these requirements to the management position responsible for operations support.
- C. The management position responsible for human resources (nuclear) is responsible for establishing a position qualification documentation and validation program.
- D. Managers are responsible for implementing the indoctrination and training program and, as appropriate, developing a certification program and implementing the certification requirements in their area of responsibility.

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11.3 Responsibilities (continued)

- E. The program elements in Section 11.2 and the related source requirements contained within the documents listed in Section 11.4 shall be addressed in the development and implementation of indoctrination, training, qualification, and certification activities.

11.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls which must be addressed in the development of programs and procedures for the indoctrination, training, qualification, and certification program.

12.0 AUDITING

12.1 General

Measures shall be established to implement a comprehensive audit program, which consists of internal audits, including TVA Nuclear and other TVA organizations, which support the nuclear program and contractor/supplier audits to determine and assess the adequacy and effectiveness of the QA program.

12.2 Program Elements

- A. An audit plan shall be prepared identifying the audits to be performed and their frequencies and schedule.
- B. Audits shall include: a determination of the effectiveness of QA program elements; evaluation of work areas, activities, processes, and items; review of documents and records; review of audit results with responsible management; follow up on corrective action taken for deviations identified during the audit; and escalation to appropriate senior management of any safety significant disagreement between the auditing organization and the organization or function being audited.
- C. Audits shall be performed in accordance with written procedures or checklists by qualified, certified, and appropriately trained personnel not having direct responsibilities in the areas being audited.
- D. Audited organizations shall provide access to facilities, documents, and personnel needed to perform the audits. They shall take necessary action to correct deviations identified by the audit in a timely manner.
- E. Internal Audits
 - 1. The scope of an audit shall be determined by considering such factors as work areas, activities, processes, or items and the specific organizations involved.
 - 2. The auditing organizations shall ensure that audit procedures and instructions adequately cover applicable elements of the NQAP.
 - 3. Audits of Design and Construction Phase units and the Fitness for Duty Program are in accordance with the Code of Federal Regulations.

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12.2 Program Elements (continued)

4. Audits of operational phase units shall be performed with oversight by the NSRB. Except as noted in 12.2E.4.f, 12.2E.4.g, 12.2E.4.h, 12.2E.4.m, and 12.2E.4.n below, audit frequencies shall be biennially. These audits shall encompass:
 - a. The conformance to provisions contained within the Technical Specifications and applicable license conditions.
 - b. The performance, training and qualifications of the plant staff.
 - c. The results of actions taken to correct deficiencies occurring in site equipment, structures, systems, components, or method of operation that affect nuclear safety.
 - d. The performance of activities required by the Nuclear Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50 and 10 CFR Part 72, Subpart G.
 - e. Any other activities and documents considered appropriate by the NSRB or the Senior Vice President and CNO.
 - f. The fire protection programmatic controls including the implementing procedures at least once per 24 months.
 - g. An independent fire protection and loss prevention program inspection and audit shall be performed at a maximum interval of 24 months utilizing either qualified offsite license personnel or an outside fire protection firm.
 - h. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than three years.
 - i. The Radiological Environmental Monitoring program and the results thereof.
 - j. The performance of activities required by the NQAP to meet the criteria of Regulatory Guide 4.15, December 1977, Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975.
 - k. The Offsite Dose Calculation Manual and implementing procedures.
 - l. The Process Control Program and implementing procedures for solidification of wet radioactive wastes.
 - m. The site Radiological Emergency Plan and implementing procedures in accordance with the Code of Federal Regulations.
 - n. The site Physical Security/Contingency Plan and implementing procedures in accordance with the Code of Federal Regulations.
 - o. The site Cyber Security Plan and implementing procedures in accordance with the Code of Federal Regulations.

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12.2 Program Elements (continued)

5. Audit Interval Extensions

- a. Audits shall be performed at the intervals designated for each audit area. Schedules shall be based on the month in which the audit starts.
- b. A maximum extension not to exceed 25 percent of the audit interval shall be allowed. No extension is allowed for scheduled audits of Emergency Preparedness, Security, Cyber Security or Access Authorization.
- c. When an audit interval extension greater than one month is used, the next audit for that particular audit area will be scheduled from the original anniversary month rather than from the month of the extended audit.

6. Audit reports, including recommendations to the management of the organization being audited, shall be maintained.

F. Contractor/Supplier Audits

1. Audits of selected suppliers shall be conducted to verify implementation and adequacy of specified QA requirements.
2. Contractors/suppliers to be audited shall be selected on the basis of the importance of their products or services to safety, status of contract activity, historical performance of the supplier, and potential QA problems that may be discovered during source surveillance inspection activities or earlier audits.
3. Audit schedules shall be prepared and audits shall be conducted in accordance with the schedules.
4. Audit reports shall be prepared and signed by the audit team leader, reviewed by management, and transmitted to the supplier and appropriate management within TVA.
5. A maximum extension not to exceed 25 percent of the audit interval may be applied to Contractor/Supplier audits that normally are of 36-month frequency. The total combined time interval for any three consecutive audit intervals should not exceed 3.25 times the specified audit interval. When an audit interval extension used, the next audit will be scheduled from the original anniversary.

12.3 Responsibilities

- A. The General Manager, QA, is responsible for the development of the TVA Nuclear audit program. The program elements in Section 12.2 and the related source requirements contained within the documents listed in Section 12.4 shall be addressed.
- B. Deleted
- C. QA is responsible to conduct audits, including audits of selected suppliers, to verify implementation and adequacy of specified QA requirements.

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12.4 Source Requirement Documents

The applicable source requirement documents and their exceptions are noted in Appendix B of this Program. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of audits.

13.0 COMPUTER SOFTWARE AND DATA

13.1 General

The program elements in Section 13.2 of this program description apply to application software meeting the criteria of Appendix E of this Program, whether procured or developed at TVA. The controls established shall be commensurate with the importance of the application software to nuclear safety.

13.2 Program Elements

- A. Controls shall be established for the development of application software and associated documentation, including requirements specification, design specifications, coding conventions, and user documentation.
- B. Controls shall be established for changes to application software and associated software documentation.
- C. Software documentation shall be controlled in accordance with Section 6.2 of this program description.
- D. Software documentation specified as QA records shall be controlled in accordance with Section 6.3 of this program description.
- E. Documentation shall be provided for application software describing the correct usage.
- F. A central list of application software, which meets the criteria of Appendix E of this program description, with appropriate levels of classification shall be established and maintained. Involved personnel shall be trained on the intent and purpose of the list.
- G. Prior to implementation, application software shall be verified to demonstrate that the system requirements are satisfied in the system design, implemented in the computer code, validated through documented tests, and the test results independently reviewed.
- H. Controls shall be established to verify the accuracy and integrity of data input into automated computer databases.
- I. For currently active application software developed or purchased prior to October 16, 1986, only the requirements of Section 13.2B, 13.2E, and 13.2F apply. In addition, this application software shall be validated through documented tests and test results independently reviewed.

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13.3 Responsibilities

The management position responsible for nuclear engineering is responsible for the development of controls for computer software and data. The program elements in Section 13.2 and the criteria of Appendix E of this program description shall be addressed.

13.4 Source Requirement Documents

The applicable source requirements documents and their exceptions are noted in Appendix B of this program description. These establish mandatory controls, which must be addressed in the development of programs and procedures for the control of computer software and data.

14.0 REFERENCES

14.1 Regulations

10 CFR 20, "Standards for Protection Against Radiation."

10 CFR 21, "Reporting of Defects and Noncompliance."

10 CFR 50, "Domestic Licensing of Production and Utilization Facilities."

10CFR50.48(c) Fire Protection, National Fire Protection Association Standard, NFPA 805

10 CFR 50.49, "Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants."

10 CFR 50.54, "Conditions of Licenses."

10 CFR 50.55, "Conditions of Construction Permits."

10 CFR 50.55a, "Codes and Standards."

10 CFR 50.55(e), "Conditions of Construction Permits."

10 CFR 50.59, "Changes, Tests, and Experiments."

10 CFR 50, Appendix A, "General Design Criteria for Nuclear Power Plants."

10 CFR 50, Appendix B, "Quality Assurance Requirements for Nuclear Power Plants and Fuel Reprocessing Plants."

10 CFR 50, Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979."

10 CFR 50.62, "Requirements for Reduction of Risk From Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants."

10 CFR 50.72, "Immediate Notification Requirements for Operating Nuclear Power Reactors."

10 CFR 50.73, "Licensee Event Report System."

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14.1 Regulations (continued)

10 CFR 50.120, "Training and Qualification of Nuclear Power Plant Personnel."

10 CFR 52, "Licenses, Certifications, And Approvals For Nuclear Power Plants."

10 CFR 55, "Operators' Licenses."

10 CFR 70, "Domestic Licensing of Special Nuclear Material."

10 CFR 71, Subpart H, "Quality Assurance (Packaging and Transportation of Radioactive Material)."

10 CFR 72, Subpart F, "General Design Criteria."

10 CFR 72, Subpart G, "Quality Assurance."

10 CFR 72, Subpart K, "General License for Storage of Spent Fuel at Power Reactor Sites."

10 CFR 72, Subpart I, "Training and Certification of Personnel."

10 CFR 72.48, "Changes, Tests, and Experiments."

10CFR 73.54, "Protection of Digital Computer and Communication Systems and Networks"

10 CFR 73.55, " Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage."

10 CFR 73.71, "Reporting of Safeguards Events."

10 CFR 74, "Material Control and Accounting of Special Nuclear Material."

10 CFR 75, "Safeguards on Nuclear Material - Implementation of US/IAEA Agreement."

10 CFR 100, "Reactor Site Criteria."

14.2 Regulatory Guidance

Refer to listing in Appendixes B and C of this program description.

14.3 TVA Licensing Submittal Documents

Browns Ferry Nuclear Plant Technical Specifications, Administrative Controls Section.

Sequoyah Nuclear Plant Technical Specifications, Administrative Controls Section.

Watts Bar Nuclear Plant Technical Specifications, Administrative Controls Section.

14.4 QA Manuals

ASME Section III Quality Assurance Manual (ASME III QAM).

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14.5 Other

INPO 84-010, "Vendor Equipment Technical Information Program (VETIP)," March 1984.

NEI 04-02, Revision 2, Guidance for Implementing A Risk-Informed, Performance-Based Fire Protection Program

NRC Certificate of Compliance for the Holtec International HI-STORM 100 Cask System, Docket No. 72-1014.

NRC Certificate of Compliance for the Holtec International HI-STORM FW System, Docket No. 72-1032.

NRC letter from H. J. Thompson, Jr., dated April 16, 1985, "Quality Assurance Guidance for ATWS Equipment That Is Not Safety Related," Generic Letter 85-06 (A02 850422 044).

NRC letter from D. G. Eisenhut dated April 24, 1986, "Implementation of Fire Protection Requirements," Generic Letter 86-10 (A02 860512 005).

NUREG 0800, Section 9.5.1, Branch Technical Position, CMEB 9.5-1 (formerly BTP ASB 9.5-1), Rev. 2, July 1981, "Fire Protection for Nuclear Power Plants."

Appendix A to Branch Technical Positions APCS 9.5-1, August 23, 1976.

Safety Evaluation by the Office of Nuclear Reactor Regulation Proposed Change to the Quality Assurance Program Common Safety Review Board conduct of Operations Southern Nuclear Operating Company, Inc. Joseph M. Farley Nuclear Plant, Units 1 and 2, Edwin I. Hatch Nuclear Plant, Units 1 and 2, Vogtle Electric Generating Plant, Units 1 and 2, Docket Nos. 50-348, 50-364, 50-321, 50-366, 50-422, and 50-425 to Appendix B

NEI 14-05, "Guidelines for the Use of Accreditation in lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1

NOTE

The terms and definitions identified in this section are important in order to have a consistent understanding of requirements of the NQAP. Regulatory Guide 1.74, which endorses ANSI N45.2.10, contains terms and definitions applicable to the nuclear industry. This section identifies acceptable alternatives to these definitions with an asterisk (*).

15.0 DEFINITIONS

Adverse Conditions - Deficiencies including non-conforming material, parts, or components; failures; malfunctions; deviations; hardware problems involving noncompliance with licensing commitments, specifications, or drawing requirements; abnormal occurrences; and non-hardware problems such as failure to comply with the operating license, technical specifications, licensing commitments, procedures, instructions, or regulations.

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15.0 DEFINITIONS (continued)

Assessment - An evaluation of the adequacy and effectiveness of quality programs, processes, ongoing tasks or activities, or management controls to identify opportunities for improvement, performance problems, or verify resolution of problems.

***Audit** - A documented activity performed in accordance with written procedures or checklists to verify, by examination and evaluation of objective evidence, that applicable elements of the NQAP have been developed, documented, and effectively implemented in accordance with specified requirements. An audit should not be confused with assessment or inspection for the sole purpose of process control or product acceptance.

Basic Component - Refer to 10 CFR 21 for definition of basic component.

Commercial-Grade Items - Refer to 10 CFR 21 for definition of commercial grade items.

Construction Tests - Those tests which are performed on safety-related and other plant components and systems on nuclear units which may satisfy prerequisites to the preoperational test program. Construction tests include pressure and other integrity tests; component and piping system cleaning and flushing; and equipment checkout, initial operation, and adjustments.

Corrective Action - The action taken to correct an adverse condition. Corrective action includes interim measures and corrective and preventive actions.

Dedication - Refer to 10 CFR 21 for definition of dedication.

Emergency Preparedness - A program which ensures the preparation and implementation of plans and procedures to provide, in the event of an emergency, protective measures for health and safety of TVA personnel and the public.

Environmental Protection - A program that provides controls, mainly in association with Environmental Protection Agency (EPA) requirements, for non-radiological environmental monitoring and compliance activities. These include hazardous and non-radiological waste material (solid, liquid, and gas) which could be released to the environment.

Experience in Nuclear Quality Assurance Related Activities - Participated in one of the following: QA or QC function or involvement in program quality for programs subject to QA/QC audits or inspection.

Features - Refers to either individual structures, systems, and components specifically called out by the scope of this Program (such as seismic Category 1 [L] items) or structures, systems, and components that may be integral to, or associated with, the programs identified in Section 5.1B of this Program.

Finding - A term defined in Quality Assurance audit and assessment procedures equivalent to adverse audit findings specified in ANSI/ASME N45.2.12 - 1977 section 4.5.

Fire Protection - A program that provides controls necessary for the protection of the life and health of TVA plant personnel and the public, to limit damage of property, and to minimize loss of generating capacity resulting from fire or explosion.

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15.0 DEFINITIONS (continued)

Functional Test - The manual operation or initiation of a system, subsystem, or component to verify that it functions within design tolerances (e.g., the manual start of a core spray pump to verify that it runs and that it pumps the required volume of water.)

Graded Approach - A methodology of applying a grading criteria based on an item's impact on safety, quality history, and other factors such that determination can be made as to the type and degree of QA program requirements which need to be applied. Refer to Section 5.2.

Greater than Class C waste (GTCC waste) - Low-level radioactive waste that exceeds the concentration limits of radionuclides established for Class C waste in 10 CFR 61.55.

Handling - The act of physically moving items by hand or by mechanical means but not including transport modes.

Hold Point - A designated stopping place during or following a specific activity at which inspection or examination is required before further work can be performed.

Important to Safety (10 CFR 72) - A system, structure, or component condition/function required to store spent nuclear fuel safely; to prevent damage to spent nuclear fuel or high-level waste container during handling and storage, and to provide reasonable assurance that spent nuclear fuel can be received, handled, packaged, stored and retrieved without undue risk to the health and safety of the public.

Independent Offsite Safety Review - Safety reviews performed by the Nuclear Safety Review Board (NSRB) which provide additional assurance that TVA licensed nuclear plants are operating without undue risk to the health and safety of plant personnel and the public.

Independent Spent Fuel Storage Installation (ISFSI) - A complex designed and constructed for the interim storage of spent nuclear fuel, solid reactor-related GTCC waste, and other radioactive materials associated with spent fuel and reactor-related GTCC waste storage. An ISFSI, which is located on the site of another facility, licensed under 10CFR72 or a facility licensed under 10CFR50 and which shares common utilities and services with that facility or is physically connected with that other facility may still be considered independent.

***Inspection** - A phase of quality control performed by certified inspection personnel or other qualified individuals approved by QA that, by means of examination, observation, and/or measurement determines the conformance of materials, supplies, components, parts, appurtenances, systems, processes, or structures to predetermined quality requirements.

Installed Compliance Instrumentation and Control (I&C) Devices - Process instruments which are used to determine or verify compliance with plant technical specification requirements for parameters such as flows, pressures, temperatures, levels, voltages, and currents.

Item - Any level of unit assembly, including structure, system, subsystem, subassembly, component, part, or material.

Line Verification - A routine verification by a qualified individual who is in the work-performing organization who did not perform or directly supervise the activity to be verified.

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15.0 DEFINITIONS (continued)

Measuring and Test Equipment (M&TE) - Equipment or devices used to calibrate, measure, gauge, examine, compare, test, inspect, monitor, or control in order to acquire data to determine compliance with design, specification, licensing, or other established requirements. M&TE includes both laboratory and portable instruments, gauges, tools, fixtures, test or analytical test stands, reference and transfer standards, nondestructive examination equipment, etc., where data obtained will be used to determine acceptability or be the basis for design or engineering evaluations.

Non-safety-Related Anticipated Transient Without Scram (ATWS) - Special features that, as referenced in 10 CFR 50.62, fall into a category of items which could be related to an expected operational transient (such as loss of feedwater, loss of condenser vacuum, or loss of offsite power to the reactor) which is not accompanied by the reactor trip system shutting down the reactor.

Notification Point - A specific pre-established point within a selected activity where work may proceed after contacting and receiving concurrence from the organization responsible for the notification point.

Nuclear Cyber Security - A program which provides controls to protect digital computer and communication systems and networks from cyber attacks in accordance with 10CFR73.54, Protection of Digital Computer and Communication Systems and Networks.

Nuclear Plant Security - A program which provides controls to ensure continued operability of security equipment and the integrity of nuclear plant security. This includes prevention of sabotage, safeguard information and material, plant access, and physical security events.

Operational Phase - That period of time during which the principal activity is associated with normal operation of the plant. This phase of plant life is considered to begin formally with receipt of the operating license onsite and ends with commencement of plant decommissioning. In addition, there are certain pre-operational activities (for example, testing, training, maintenance) proceduralized in accordance with operations NQAP requirements and initiated by the operations staff prior to receipt of the operating license which are considered to be operational phase activities at the time these activities begin.

Post maintenance Tests - Testing performed after completion of maintenance to verify the operational/functional acceptability of components/systems upon completion of maintenance.

Post modification Tests - Tests performed after completion of a plant modification to demonstrate conformance with as-designed requirements and to determine the effect of the modification on the overall system.

Pre-operational Tests - Tests identified in a facility's Safety Analysis Report and performed on any system or plant feature for the purpose of proving its ability to perform its designed function.

Procurement Documents - Contractually binding documents that identify and define the requirements that items or services must meet in order to be considered acceptable by the purchaser.

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15.0 DEFINITIONS (continued)

Programs - Programs which administer and control activities and associated features as identified in Section 5.1B of this Program that require control based on regulatory requirements or TVA commitments.

Quality Assurance Records - Those records which furnish documentary evidence of the quality of items and of activities affecting quality. A document is considered to be a QA record when the document has been completed.

Quality Control Inspectors - Personnel whose qualifications are not required to meet those specified in ANSI N18.1 and who are performing inspection, examination and testing activities during the construction or operational phases of the plant shall be qualified to ANSI N45.2.6-1978 as certified Quality Control Inspectors.

Quality-Related - Quality-related is a term which encompasses quality assurance program requirements that describe activities which affect structures, systems, and components. These requirements provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public. In addition to safety-related structures, systems, components, and activities, the term "quality-related" encompasses the broad class of plant features covered (not necessarily explicitly) in the General Design Criteria of 10 CFR 50, Appendix A, that contribute in an important way to the safe operation and protection of the public in all phases and aspects of facility operation (i.e., normal operation and transient control as well as accident mitigation).

Radioactive Material Shipment - A program that provides controls for handling and/or shipping of radioactive material (NRC-licensed packages only).

Radwaste Management Systems, Structures, and Components - Special features containing radioactive materials (i.e., liquids, gases, or solids) that, by design or operating practice, provide a means of processing prior to final disposition.

Reference Standards - Standards (primary, secondary, and working standards where appropriate) used in a calibration program. These standards establish the basic accuracy limits for the calibration program.

Reportable Events - Any of those conditions specified in 10 CFR 50.73.

Safety-Related Structures, Systems, and Components - Those items that are necessary to ensure:

- A. The integrity of the reactor coolant pressure boundary.
- B. The capability to shutdown the reactor and maintain it in a safe condition.
- C. The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the applicable guideline exposures set forth in 10 CFR 50.34(a)(1) or 10 CFR 100.11, as applicable.

Seismic Category I(L) - Special features that apply to non-safety-related systems, structures, and components which provide structural integrity in preventing damage to a safety-related system, structure, and component in case of a failure and/or damage during a safe shutdown earthquake (SSE).

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15.0 DEFINITIONS (continued)

Significant Adverse Condition - A documented adverse condition that is determined to be a QA programmatic deficiency. Criteria for significance are specified in the corrective action program.

Special Nuclear Material Management - A program which provides for special nuclear material (SNM) control and accountability as required by 10 CFR 70, 74, and 75. This program includes SNM inventories and system reviews, inspections, records management, and DOE/NRC inventory and transfer reports.

Special Tests - A test that is (a) an engineering test including qualification testing for design verification or evaluation of components, structures, or systems, (b) a general test that is not specifically related to plant systems or features, such as the material testing and product testing that is normally performed by a testing lab, or (c) tests or experiments not described in the facilities Safety Analysis Report which may affect the operation of systems described therein (reference 10 CFR 50.59 and 10 CFR 72.48).

Startup Tests - Those tests as identified in the Final Safety Analysis Report that commence after receipt of an operating license allowing fuel loading and testing at ranges through zero power, power escalation, and 100% warranty run. Startup tests prove that the unit has been properly designed and constructed and will meet all licensing requirements and specific contractual criteria. Startup tests are also referred to as Power Ascension Tests.

***Storage** - The act of holding items at the construction or operating Site in an area other than its permanent location in the plant.

Surveillance Tests - Periodic tests to verify that structures, systems, and components continue to function or are in a state of readiness to perform their functions.

Test Record Drawings - A set of as-constructed drawings which depict the configuration of a system as tested.

Test Scoping Documents - Documents which include descriptions of each test to be performed including safety precautions to be followed, specific identification of test objectives, the means of performing the test, prerequisites that must be completed, environmental conditions required for testing, justification for a proposed degree of simulation less than full simulation, and specific acceptance criteria or a description of the means of determining acceptance criteria from functional testing requirements.

Test Deficiency - Any condition during which the equipment or system being tested: (1) fails to operate (e.g., pump will not operate, no control room annunciation), (2) operates in a suspected adverse manner (e.g., motor operates but smokes, questionable vibration), or (3) operates outside limits of documented acceptance criteria (e.g., inadequate flow, slow valve closure time).

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15.0 DEFINITIONS (continued)

Trend Analysis - Evaluation of data that has been compiled or grouped onto charts, diagrams, reports, or other formats such that the prevailing tendency of selected parameters can identify areas that need improving and areas of past successes.

***Verification** - An act of confirming, substantiating, and ensuring that an activity or condition has been implemented and accomplished in conformance with specific requirements. This includes line verifications.

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Comparison Matrix of Quality Assurance Program Requirements with those of 10 CFR 50, Appendix B, 10 CFR 72, Subpart G, and Selected ANSI Standards

<u>10 CFR 50, Appx B</u>		<u>10 CFR 72, Subpart G</u>	<u>ANSI N45.2 - 1971</u>		<u>ANSI N18.7 - 1976</u>	
Criterion	NQAP		Section	NQAP	Section	NQAP
I	4.0; 4.1	72.142	2.0	5.0	3.1	4.1; 5.0
II	5.0	72.144	3.0	4.0; 4.1	3.2	4.0; 4.1
III	7.0	72.146	4.0	7.0	3.3	11.0
IV	8.1	72.148	5.0	8.1	3.4	4.0; 11.0
V	6.0; 7.0; 9.9	72.150	6.0	6.0; 7.0; 9.9	4.0	4.1.7C; 5.3; 6.0
VI	6.0; 7.0; 9.9	72.152	7.0	6.0; 7.0; 9.9		4.1.10; 9.9; 12.0
VII	8.2	72.154	8.0	8.2	5.1	5.0
VIII	8.3	72.156	9.0	8.3	5.2.1	4.0
IX	9.3	72.158	10.0	9.3	5.2.2	6.0
X	9.1	72.160	11.0	9.1	5.2.3	6.0
XI	9.4	72.162	12.0	9.4	5.2.4	6.0
XII	9.5	72.164	13.0	9.5	5.2.5	6.0
XIII	9.6	72.166	14.0	9.6	5.2.6	6.0; 9.7
XIV	9.7	72.168	15.0	9.7	5.2.7	6.0; 9.8
XV	10.0	72.170	16.0	10.0	5.2.8	6.0; 9.1; 9.4
XVI	10.0	72.172	17.0	10.0	5.2.9	5.1; 6.0
XVII	6.3	72.174	18.0	6.3	5.2.10	4.1.2; 6.0
XVIII	12.0	72.176	19.0	12.0	5.2.11	6.0; 10.0
					5.2.12	6.0; 6.3
					5.2.13	6.0; 8.0; 9.6
					5.2.14	6.0; 10.0
					5.2.15	6.0
					5.2.16	6.0; 9.5
					5.2.17	6.0; 9.1
					5.2.18	6.0; 9.3
					5.2.19	6.0; 9.4
					5.3	6.0
					5.3.1	6.0
					5.3.2	6.0
					5.3.3	6.0
					5.3.4	6.0
					5.3.5	6.0; 9.8
					5.3.6	6.0; 5.1
					5.3.7	6.0; 9.5
					5.3.8	6.0; 5.1
					5.3.9	6.0; 5.1
					5.3.10	6.0; 9.1; 9.4

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Table 1 (pages 1 through 10) is a matrix of the source requirement documents (e.g., Regulatory Guides and ANSI Standards) which apply to applicable portions of the NQA program description. Table 1 specifies the particular sections of the source documents (e.g., ANSI N18.7, Section 5.2.12) that establish mandatory controls, which must be addressed in the development of the associated implemented programs and procedures.

Table 2 (pages 11 through 29) identifies alternatives to sections of the source requirement documents listed in Table 1.

TABLE 1

<div style="text-align: center;">SOURCE REQUIREMENT DOCUMENT</div> <div style="text-align: center;">NQA PLAN SECTION</div>	Procedures and Instructions 6.1.4	Document Control 6.2.4	QA Records 6.3.4	Design Control 7.4	Procurement Document Control 8.1.4	Control of Purchased Material, Equipment, and Services 8.2.4	Identification and Control of Materials, Parts, and Components 8.3.4	Inspection and Line Verification 9.1.4	Control of Special Processes 9.3.4	Test Control 9.4.4	Control of M&TE and Installed Safety-Related I&C Devices 9.5.4	Handling, Storage and Shipping 9.6.4	Inspection, Test and Operating Status 9.7.4	Control of Maintenance 9.8.4	Adverse Conditions 10.4	Identification, Training Qualification, and Certification 11.4	Auditing 12.4	Computer Software and Data 13.4	Definitions 15.0
Reg. Guide 1.8 R/2 April 1987 ANSI N18.1 - 1971, and ANSI/ANS 3.1 - 1981, "Personnel Selection & Training"								X								X			
Reg. Guide 1.33 R/2 February 1978 ANSI N18.7 - 1976/ANS-3.2, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants"	X Sect. 5	X Sect. 5.2.15	X Sect. 5.2.12	X Sect. 5.2.7.2	X Sects. 5.2.13 5.2.13.1	X Sect. 5.2.13.2	X Sect. 5.2.13.3	X Sects. 5.2.8 5.2.17	X Sects. 5.2.12 5.2.18	X Sects. 5.2.8 5.2.19	X Sect. 5.2.16	X Sect. 5.2.13.4	X Sects. 5.2.6 5.2.8 5.2.14	X Sects. 5.2.7 5.3.5	X Sects. 5.2.11 5.2.14	X Sect. 3.3	X Sect. 4.5		
Reg. Guide 1.28 R/3 August 1985 ANSI N45.2 - 1971 "Quality Assurance Program Requirements for Nuclear Power Plants"	X Sect. 6	X Sect. 7	X Sect. 18	X Sect. 4	X Sect. 5	X Sect. 8	X Sect. 9	X Sect. 11	X Sect. 10	X Sect. 12	X Sect. 13	X Sect. 14	X Sect. 15		X Sects. 16 17	X Sect. 2	X Sect. 19		

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TABLE 1

SOURCE REQUIREMENT DOCUMENT	NQA PLAN SECTION	Procedures and Instructions	Document Control	QA Records	Design Control	Procurement Document Control	Control of Purchased Material, Equipment, and Services	Identification and Control of Materials, Parts, and Components	Inspection and Line Verification	Control of Special Processes	Test Control	Control of M&TE and Installed Safety-Related I&C Devices	Handling, Storage and Shipping	Inspection, Test and Operating Status	Control of Maintenance	Adverse Conditions	Identification, Training Qualification, and Certification	Auditing	Computer Software and Data	Definitions
		6.1.4	6.2.4	6.3.4	7.4	8.1.4	8.2.4	8.3.4	9.1.4	9.3.4	9.4.4	9.5.4	9.6.4	9.7.4	9.8.4	10.4	11.4	12.4	13.4	15.0
Reg. Guide 1.37 R/0 March 16, 1973 ANSI N45.2.1 - 1973, "Cleaning of Fluid Systems and Associated Components During Construction Phase of Nuclear Power Plants"		X Sects. 2.1 2.2		X Sect. 9					X	,	X	X Sect. 2.5								
Reg. Guide 1.38 R/2 May 1977 ANSI N45.2.2 - 1972 "Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants (During the Construction Phase)"		X Sects. 2.1 2.2		X Sect. 8			X Sect. 5	X	X Sects. 5.2 7.4		X Sect. 2.3	X Sect. 2.5	X		X Sect. 6	X Sect. 5.5				
Reg. Guide 1.39 R/2 September 1977 ANSI N45.2.3 - 1973 "Housekeeping During the Construction Phase of Nuclear Power Plants"		X Sects. 2.1,2.2		X Sect 4					X				X Sect. 3.3							

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TABLE 1

SOURCE REQUIREMENT DOCUMENT	NQA PLAN SECTION																		
	Procedures and Instructions 6.1.4	Document Control 6.2.4	QA Records 6.3.4	Design Control 7.4	Procurement Document Control 8.1.4	Control of Purchased Material, Equipment, and Services 8.2.4	Identification and Control of Materials, Parts, and Components 8.3.4	Inspection and Line Verification 9.1.4	Control of Special Processes 9.3.4	Test Control 9.4.4	Control of M&TE and Installed Safety-Related I&C Devices 9.5.4	Handling, Storage and Shipping 9.6.4	Inspection, Test and Operating Status 9.7.4	Control of Maintenance 9.8.4	Adverse Conditions 10.4	Identification, Training Qualification, and Certification 11.4	Auditing 12.4	Computer Software and Data 13.4	Definitions 15.0
Reg. Guide 1.30 R/0 August 11, 1972 ANSI N45.2.4 - 1972, "Installation, Inspection, and Testing Requirements for Instrumentation and Electric Equipment During the Construction of Nuclear Power Generating Stations"	X Sects. 2.1 2.3	X Sect. 2.3	X Sect. 8			X Sect. 2.2		X Sects. 2.4,5.1 6.1,7.0		X	X Sect. 2.5	X Sect. 2.2	X		X Sect. 2.6				
Reg. Guide 1.94 R/1 April 1976 ANSI N45. 2.5 - 1974 Supplementary Quality "Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants"	X Sect. 2.1 2.2	X Sect. 2.2	X Sect. 7				X	X Sects. 2.3, 4, 5, 6		X	X Sect. 2.5	X	X Sects. 3, 4, 5			X Sect. 2.4			
Reg. Guide 1.58 R/1 September 1980 ANSI/ASME N45.2.6 - 1978 "Qualifications of Inspection, Examination, and Testing Personnel for Nuclear Power Plants"			X Sect. 6					X	X	X						X			

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TABLE 1

<div> <div>SOURCE REQUIREMENT DOCUMENT</div> <div>NQA PLAN SECTION</div> </div>	Procedures and Instructions 6.1.4	Document Control 6.2.4	QA Records 6.3.4	Design Control 7.4	Procurement Document Control 8.1.4	Control of Purchased Material, Equipment, and Services 8.2.4	Identification and Control of Materials, Parts, and Components 8.3.4	Inspection and Line Verification 9.1.4	Control of Special Processes 9.3.4	Test Control 9.4.4	Control of M&TE and Installed Safety-Related I&C Devices 9.5.4	Handling, Storage and Shipping 9.6.4	Inspection, Test and Operating Status 9.7.4	Control of Maintenance 9.8.4	Adverse Conditions 10.4	Identification, Training Qualification, and Certification 11.4	Auditing 12.4	Computer Software and Data 13.4	Definitions 15.0
Reg. Guide 1.64 R/2 June 1976 ANSI N45.2.11 - 1974 "Quality Assurance Requirements for the Design of Nuclear Power Plants"	X Sect. 2.2	X Sect. 7	X Sect. 10	X											X Sect. 9		X Sect. 11	X Sect. 6.1	
Reg. Guide 1.144 R/1 September 1980 ANSI N45.2.12 - 1977 "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants"			X Sect. 5														X		
Reg. Guide 1.123 R/1 July 1977 ANSI N45.2.13 - 1976 "Quality Requirements for Control of Procurement of Items and Services for Nuclear Power Plants"	X Sect. 2		X Sect. 11		X Sect. 3.0	X		X Sects. 7 10			X Sect. 7.4				X Sects. 8 9	X Sect. 7.5	X		
Reg. Guide 1.146 R/0 August 1980 ANSI N45. 2.23 - 1978 "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"			X Sect. 5													X	X		

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TABLE 1

<div> <div>SOURCE REQUIREMENT DOCUMENT</div> <div>NQA PLAN SECTION</div> </div>	Procedures and Instructions 6.1.4	Document Control 6.2.4	QA Records 6.3.4	Design Control 7.4	Procurement Document Control 8.1.4	Control of Purchased Material, Equipment, and Services 8.2.4	Identification and Control of Materials, Parts, and Components 8.3.4	Inspection and Line Verification 9.1.4	Control of Special Processes 9.3.4	Test Control 9.4.4	Control of M&TE and Installed Safety-Related I&C Devices 9.5.4	Handling, Storage and Shipping 9.6.4	Inspection, Test and Operating Status 9.7.4	Control of Maintenance 9.8.4	Adverse Conditions 10.4	Identification, Training Qualification, and Certification 11.4	Auditing 12.4	Computer Software and Data 13.4	Definitions 15.0
NUTAC Report on Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events," Section 2.2.2 (letter from L. M. Mills to H. R. Denton dated September 17, 1984)			X										X		X		X		
ANSI/ASNT CP-189-1995 "Standard for Qualification and Certification of Nondestructive Testing Personnel"									X										
ASME OM Code "Code for Operation and Maintenance of Nuclear Power Plants"				X						X			X		X				
Final Safety Evaluation for Technical Report NEI 14-05, "Guidelines for the Use of Accreditation in lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," Revision 1																	X		

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Table 2

REGULATORY GUIDE CONFORMANCE STATUS

NRC Regulatory Guide 1.8 - "Personnel Selection and Training," Revision 2, 4/87, endorses ANSI N18.1-1971 and ANSI/ANS 3.1-1981.

The Nuclear Quality Assurance Plan (NQAP) follows this Guide with the following alternatives:

- A. TVA will meet the requirements of Regulatory Guide 1.8, Revision 2 (4/87) for all new personnel qualifying on positions identified in regulatory position C.1 after January 1, 1990. Personnel qualified on these positions prior to this date will still meet the requirements of Regulatory Guide 1.8, Revision 1-R (5/77). As specified in regulatory position C.2, all other positions will meet the requirements of ANSI/ANS N18.1-1971.
- B. Section 4.3.2 - There may be occasions where TVA will utilize a composite crew (multidiscipline) during operations phase activities to efficiently perform a task. As such, a foreman may not have the experience required in one of the disciplines he supervises. In these instances, the foreman will meet the requirements of ANSI N18.1 in at least one of the disciplines, and additional technical support, procedure support, and/or discipline support will be available to the foreman for the task period.
- C. In lieu of the training guidelines endorsed by Regulatory Guide 1.8, Revision 2, specified in Regulatory Position Sections C.1.b and C.1.f, TVA shall comply with the requirements of 10 CFR 55.31(a) (4) and 10 CFR 55.59 as they apply to training programs based on a Systems Approach to Training (SAT) as defined in 10 CFR 55.4 and using a plant-referenced simulator as required by 10 CFR 55.45.
- D. TVA uses the methodology for equating education and experience contained in ANSI 3.1-1987 for guidance to evaluate equivalent related experience for a degree.
- E. In addition to the training guidelines in subsections 5.3.2, 5.3.3, 5.3.4, and 5.5 of ANSI N18.1-1971, TVA shall comply with the requirements of 10 CFR 50.120 as it applies to training programs based on a systems approach to training.
- F. In lieu of the one year of experience in the implementation of the quality assurance program for the management position responsible for site QA (ANSI/ANS 3.1-1981, Section 4.4.5.b), TVA requires five years experience in QA-related activities.

NRC Regulatory Guide 1.28 - "Quality Assurance Program Requirements (Design and Construction)," Revision 3, 8/85, allows continued implementation of ANSI N45.2-1971 as previously committed.

The NQAP follows this Guide.

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NRC Regulatory Guide 1.30 - "Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment," 8/72, endorses ANSI N45.2.4-1972.

The NQAP follows this Guide with the following alternatives:

- A. ANSI N45.2.4 states that the Appendixes are not a part of the standard; therefore, TVA does not consider the Appendixes to be mandatory.
- B. Section 2.1, "Planning" - The intent of this section shall be met in different forms depending on magnitude and scope of work.
- C. During the operational phase, tests are performed as determined by the site engineering organization, modification, or maintenance engineers, as appropriate, based upon the equipment or system functions that could be impacted by the work performed.
- D. TVA's alternative to the tagging of in plant process instruments for calibration status (ANSI N45.2.4, Section 6.2.1) is that each item of process control instrumentation is uniquely identified with an instrument number. This number is utilized in an instrument maintenance record so that the current calibration status and data attesting to the status of each item are documented along with the identification of the person performing the calibration. In addition, this record system provides a mechanism for evaluating equipment performance and adjusting calibration frequencies to ensure quality performance.
- E. Section 6.2.2 - For modifications, TVA interprets this section as not requiring that an entire system be retested after modifications. Testing will be performed on equipment that has or could be impacted by the modification in accordance with applicable design and testing requirements to verify that operability requirements are met and that interfacing components and equipment functions have not been degraded.
- F. TVA implements the requirements of N45.2.4 Sections 5.1 and 6.1 with a performance-based graded QA verification program consisting of quality control inspection, line verification, and quality assessments.

NRC Regulatory Guide 1.33 - "Quality Assurance Program Requirements (Operations)," Revision 2, 2/78 endorses ANSI N18.7-1976/ANS 3.2.

The NQAP follows this Guide with the following alternatives:

- A. ANSI N18.7-1976 references certain other standards to which TVA takes exception. TVA's exception and appropriate alternatives to the other standards are listed in this Appendix in the appropriate location.
- B. Section 5.2.2 - The guidelines of this section are accepted with the following interpretations:

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1. Temporary changes which clearly do not change the intent of the approved procedure shall as a minimum be approved by two individuals who are either a member of the plant management staff or a Nuclear Unit Senior Operator. At least one of the individuals shall hold a Senior Reactor Operator License on the unit affected or as defined in Section 9.9 of this Program, the FSAR, or appropriate plant procedures.
 2. For facilities holding a construction permit where system(s) and/or components have been released to the operations organization, temporary changes to procedures, as described above, shall as a minimum be approved by two members of the plant management staff, at least one of whom shall be a designated member of the plant operations management staff.
- C. Section 5.2.13.1 - The statement that changes made to procurement documents be subject to the same degree of control as was used in the preparation of the original documents is applied consistent with the requirements of ANSI N45.2.11, paragraph 7.2. Minor changes to documents, such as inconsequential editorial corrections or changes to commercial terms and conditions, may not require that the revised document receive the same review and approval as the original documents.
- D. Section 5.2.15 - The guidelines of this section are accepted with the following alternatives:
1. Minor changes to documents are processed as delineated in Section 6.1.2F.3 of this Program.
 2. TVA has programmatic controls in place that make a biennial review process unnecessarily duplicative. These programmatic controls ensure procedures are periodically reviewed and maintained current when pertinent source material is revised; the plant design changes; and/or any deficiencies occur. TVA has determined that this approach better addresses the purpose of the biennial review process and that, from a technical and practical standpoint, is better suited to ensure the validity of operational phase site procedures and instructions.
- E. Section 5.2.17 - The statement that deviations, their cause, and any corrective action completed or planned shall be documented will apply to significant deviations. Other identified deviations will be documented and corrected. This interpretation is consistent with Appendix B to 10 CFR 50, Criterion XVI, "Corrective Action."
- F. TVA will comply with regulatory position C.4 except that audit frequencies are specified in NQAP Section 12.2E. A grace period not to exceed 90 days will be applied to the biennial frequency for internal audits described in Section 4.5 of ANSI N18.7-1976 which states that audits of safety-related activities are completed "within a period of two years." This grace period will not be applied to audits of the Radiological Emergency Plans to satisfy the requirements of 10 CFR 50.54 (t) (1), Security to satisfy the requirements of 10 CFR 50.54 (p) (3) and 10 CFR 73.55 (m), Access Authorization to satisfy the requirements of 10 CFR 73.56 (n) (1) and (n) (2).

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- G. Section 4.3.4.4.c - The independent review body implements this section by reviewing reportable events that are reported to the NRC in accordance with 10 CFR 50.73.
- H. When purchasing commercial grade services from domestic and international calibration or testing laboratories accredited to ISO/IEC 17025 that are accredited by an Accreditation Body that is a signatory to the ILAC MRA, the procurement documents are not required to impose a quality assurance program consistent with ANSI N45.2-1971. Alternative requirements described in NRC Final Safety Evaluation for Technical Report NEI 14-05 Revision 1, Agencywide Documents Access and Management System (ADAMS) Accession No. ML14322A535 may be implemented in lieu of imposing a quality assurance program consistent with ANSI N45.2-1971.

NRC Regulatory Guide 1.37 - "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water Cooled Nuclear Power Plants," 3/73, endorses ANSI N45.2.1-1973.

The NQAP follows this Guide with the following alternatives:

- A. The phrase "when applicable" used in Regulatory Guide 1.37, paragraph C.2, leaves open to interpretations which specific requirements and recommendations contained in ANSI N45.2.1-1973 are applicable to and achievable during the construction or operation phase. The interpretation of "when applicable" will be made with appropriate concurrence in a written procedure before its application.
- B. The second sentence of paragraph C.3 should be amended to read:

"The water quality for final flushes of fluid systems and associated components during the operations phase shall be at least equivalent to the quality required for normal operation. This requirement does not apply to dissolved oxygen or nitrogen limits nor does it infer that other additives normally in the system water will be added to the flush water."
- C. Temporary ink markings placed by the fabricator as mill marks may remain on components that operate at temperatures greater than 140°F (normal or accident) and have a 40 year integrated radiation dose less than 10⁶ rads.
- D. Control of halogen, sulfur, or low-melting metal contents is not required for abrasive tools such as grinding wheels, cutoff wheels, sanding paper, and flapper wheels. Use of abrasive tools on corrosion-resistant alloys shall be followed by cleaning with an approved solvent. Particulate residue shall be removed by vacuum, brush, dry wiping cloth, or air, with special attention to crevices.
- E. Temporary tape and markings (ink and paint) may remain on components that operate at temperatures less than 140°F (normal or accident).

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- F. Section 2.1, "Planning - For operations phase activities, the required planning is frequently performed on a generic basis for application to many systems and component installations. This results in standard procedures for cleaning, inspection, and testing which meet the requirements of the standard. Individual plans for each item or system are not normally prepared unless the work operations are unique; however, standard procedures are reviewed for applicability in each case. Cleaning procedures are limited in scope to those actions or activities, which are essential to maintain or achieve required quality. This is consistent with Section 5.2.17, paragraph 5, of ANSI N18.7-1976, which provides for examination, measurement, or testing to ensure quality or indirect control by monitoring of processing methods.
- G. TVA intends to conform to the cleanness requirements of Section 3.1 of ANSI N45.2.1-1973 with the exception of permissible particle sizes for cleanness Classes B and D. In these cases, TVA will conform to the requirements of ANSI N45.2.1-1980, Section 3.2.2.1(b), which states, "There shall be no particles larger than 1/32 inches by 1/16 inches long (0.8 mm by 1.6 mm)" for cleanness Class B, and Section 3.2.4.4 which states, "Particles no larger than 1/16 inch by 1/8 inch long (1.6 mm by 3.2 mm) on a 14 mesh (1.4 mm, ASTM E-11, "Specification for Wire Cloth Sieves for Testing Purposes) or finer filter, or the equivalent" for cleanness Class D.

NRC Regulatory Guide 1.38 - "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water Cooled Nuclear Power Plants," Revision 2, 5/77 endorses ANSI N45.2.2-1972.

The NQAP follows this Guide with the following alternatives:

- A. Storage requirements at the site are determined by the responsible engineering unit. This determination involves an evaluation of the complexity of the item and its importance to safety. The various types of storage are provided (yard, warehouse, humidity controlled, etc.) but the classification levels of N45.2.2 are not necessarily employed.
- B. In accordance with ASME QA Case 78-N45.2.2-01-0, welding electrodes hermetically sealed in metal containers may be stored under conditions described for level C items unless other storage requirements are specified by the manufacturer. Storage conditions for level C items may also apply to bare wire and consumable inserts unless specified otherwise by the manufacturer.
- C. Austenitic stainless steel and nickel alloy items may have markings applied directly to the bare metal surfaces provided the requirements of TVA internal procedures, which control the chemical content of the marking materials, are met.

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- D. Tubing and piping materials shall have end caps or plugs while in storage unless specified otherwise by engineering specification. End caps or plugs are not mandatory on tube or pipe fittings provided the requirements of TVA internal procedures to store under cover with protection from the elements are met. These materials are required to be in a visually clean condition and free of visually detectable defects prior to installation.
- E. Section 6.4.1 - TVA will meet this section through periodic inspection of randomly selected stored items by QC inspection personnel certified to ANSI N45.2.6. The criteria and factors regarding frequency and degree are established in Section 5.2A and 5.2B of this Program.
- F. TVA takes exception to ANSI N45.2.2, Section 5.2.1. TVA's alternative is that shipping damage inspection shall be done before unloading if evidence of possible shipping damage would be lost in unloading, such as when the item is secured to the carrier, covered by tarpaulin, accompanied by a visible impact recorder, or when the contract requires any of the above. Personnel performing preliminary visual observations (prior to unloading) per Section 5.2.1 need not be qualified to ANSI N45.2.6. Item inspections per Section 5.2.2 are performed by personnel qualified to ANSI N45.2.6. The item inspections also ensure that no damage has occurred during shipping.
- G. Section 6.4.2(8) - TVA will follow either vendor recommendations for preventive maintenance, an engineering evaluation, or engineering requirements documents delineating appropriate maintenance requirements, for items in storage. Engineering evaluations and engineering requirement documents will consider vendor recommendations.
- H. Section 6.5 (last sentence) - During a period of installed storage or extended layup after release of an item from permanent storage, vendor recommendations for preventive maintenance, or an engineering evaluation or an engineering requirements document delineating appropriate maintenance requirements will be followed. Engineering evaluations and engineering requirement documents will consider vendor recommendations.
- I. TVA's alternative to the requirements of Section 6.6 of ANSI N45.2.2 is that Procurement will maintain written records of pertinent information such as storage location and receipt inspection results and will take necessary action to provide packaging for items not suitably packaged for storage. Written records of personnel access to nuclear stores are kept for entry during times when nuclear stores personnel are not on duty. All other times, the storeroom is locked and admittance is controlled by stores personnel.
- J. TVA does not utilize specific levels for classification of items (ANSI N45.2.2, Section 2.7); however, the specific requirements identified in the Standard are used as a guide with respect to protecting the equipment.

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- K. TVA does not utilize specific levels for packaging (ANSI N45.2.2, Section 3.2). All purchased items have been properly packaged. Additionally, periodic storage inspections are conducted to ensure protective measures specified in the Standard to prevent damage or deterioration are complied with and is imposed until the item or component is issued for use. Purchased items undergo receiving inspection using the graded approach. This inspection verifies that items have been properly packaged for shipment and will ensure that any special protective measures specified in the Standard to prevent damage, deterioration, or contamination will be imposed until the item or component is issued for use.
- L. TVA takes exception to the requirement (ANSI N45.2.2, Section 6.2.4) that salt-tablet dispensers in any storage area shall not be permitted. TVA Procurement stores salt-tablet dispensers in sealed containers for use outside of the storage area only.
- M. Sections 7.3.2 and 7.4.2 - Use of hoisting equipment beyond its rated load is acceptable when specifically approved with technical justification by engineering.
- N. Section 5.2.2(1) Physical Properties - QC Inspectors, Engineers, or other technically competent individuals assure that physical properties conform to specified requirements and that chemical and physical test reports meet the requirements.
- O. Section 2.4 - Off-site inspection, examination or testing is audited by personnel who are qualified in accordance with ANSI N45.2.23 rather than ANSI N45.2.6 as stated in the ANSI Standard.

NRC Regulatory Guide 1.39 - "Housekeeping Requirements for Water-Cooled Nuclear Power Plants," Revision 2, 9/77 endorses ANSI N45.2.3-1973.

The NQAP follows this Guide with the following alternative:

The zone designations of Section 2.1 of N45.2.3 and the requirements associated with each zone are not consistent with the requirements for an operating plant. Instead, TVA Nuclear procedures or instructions for housekeeping activities which include the applicable requirements outlined in Section 2.1 of N45.2.3 and which take into account radiation control considerations, security considerations, fire protection considerations, and personnel and equipment safety considerations are developed on a case basis.

NRC Regulatory Guide 1.58 - "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel," Revision 1, 9/80 endorses ANSI N45.2.6-1978.

The NQAP follows this Guide with the following alternatives:

- A. TVA complies with Regulatory Position C.1 of this Regulatory Guide, as follows:
 - 1. Construction testing personnel are qualified to Regulatory Guide 1.28 (ANSI N45.2).

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2. Operations, maintenance, and modification testing personnel are qualified to Regulatory Guide 1.8 (ANSI N18.1) as endorsed in Appendix B of this program description.
 3. Quality control inspection personnel are qualified to ANSI N45.2.6.
- B. Certifications may not correspond to the levels established in N45.2.6. Inspection, examination, and testing personnel may be classified by disciplines (mechanical, civil, electrical, instrumentation, hanger, etc.) and certified by procedure to perform the functions identified in N45.2.6, Tables I, L-I, and L-II.
- C. Medical eye examinations for inspection, testing, and examination personnel are made in accordance with TVA eye examination requirements.
- D. ANSI/ASNT CP-189, 1995 Ed. "Standard for Qualification and Certification of Nondestructive Testing Personnel" will be used to qualify and certify Nondestructive Examination (NDE) personnel. In ASME Section XI applications, CP-189 will be used, as modified by ASME Section XI. ANSI/ASNT CP-189, 1995 Ed. is acceptable for qualification of personnel performing NDE of primary containment.
- E. TVA complies with Regulatory Position C.2 as follows: For containment leak rate testing personnel, TVA as a minimum will meet the qualification requirements of ANSI N45.2.6 as endorsed by Regulatory Guide 1.58, Revision 1.

NRC Regulatory Guide 1.64 - "Quality Assurance Requirements for the Design of Nuclear Power Plants," Revision 2, 6/76, endorses ANSI N45.2.11-1974.

The Nuclear Quality Assurance Program follows this Guide with the following alternative to Regulatory Position C.2:

- A. If in an exceptional circumstance, the engineer's supervisor is the only person technically qualified to perform the review, the design verification review will be conducted by the supervisor, provided that:
1. The other provisions of this Regulatory Guide and ANSI N45.2.11, Section 6.1 are satisfied.
 2. The justification is individually documented and approved in advance by the supervisor's management.
 3. QA will audit the use of supervisors as design verifiers to guard against abuse.

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NRC Regulatory Guide 1.74 - "Quality Assurance Terms and Definitions," 2/74, endorses ANSI N45.2.10-1973.

The NQAP follows this Guide with applicable alternatives noted in Section 15.0 of this Program.

NRC Regulatory Guide 1.88 - "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records," Revision 2, 10/76, endorses ANSI N45.2.9-1974.

Requirements of Regulatory Guide 1.88 (and the alternatives listed below) apply to 10 CFR 72 required records including: Records required by 10 CFR 72 must be maintained in duplicate storage.

The NQAP follows this guide with the following alternatives:

- A. Section 2.2.1 - TVA may also define lifetime QA records to be "life of the nuclear liability policy, plus the subsequent 10 years during which claims may be covered by the policy." This definition is consistent with ANI Information Bulletin 15-01 "Nuclear Liability Insurance Records Retention, and the requirements of our nuclear insurer.
- B. Section 5.4.3 - In order to preclude deterioration, manufacturer's packaging and storage recommendations for special process records will be considered.
- C. Section 5.6 - TVA will provide two-hour minimum fire-rated protection for QA records and utilize one of the following alternatives as single storage facilities:
 - 1. A fire-resistive vault or file room that meets the applicable requirements of ANSI N45.2.9-1974 with the following exceptions:
 - a. Records will be afforded the protection of a two-hour rated facility.

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- b. Records will be stored in fully enclosed cabinets.
 - c. Structure, doors, frames, and hardware shall be designed to fully comply with a minimum two-hour rating.
 - d. Pipes or penetrations will be allowed for fire protection, lighting, temperature, humidity control, or communications.
 - e. Work not directly associated with records storage or retrieval will be prohibited in the facility.
 - f. Smoking and eating/drinking will be prohibited throughout the records facility.
- 2. One-hour fire-rated cabinets if the following conditions are met:
 - a. The records are recreatable, OR
 - b. Are contained within a facility of fire-resistive construction with adequate smoke detection or fire-suppression systems: OR
 - c. Are within a facility with a fuel loading less than 25 pounds/square foot as defined by NFPA 232-1980.
- D. QA records may be temporarily stored for 60 days or less in steel file cabinets or drawers if the following conditions are met:
 - 1. The records are recreatable, OR
 - 2. Are contained within a facility of fire-resistive construction with adequate smoke detection or fire-suppression systems: OR
 - 3. Are within a facility with a fuel loading less than 25 pounds/square foot as defined by NFPA 232-1980.
- E. For storage of film and other processed records, humidity and temperature controls shall be provided to maintain a stable environment. Recommendations by the manufacturer will be considered in determining an acceptable range of tolerance.
- F. In addition to the records specified in Appendix A to ANSI N45.2.9-1974, the following records and retention times are applicable to **WBN**:
 - 1. Licensee Event Reports required by 10 CFR 50.73 (3 years).

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2. Records of changes made to the procedures required by NQAP Section 9.9.2B.7.a for WBN only (3 years).
3. Records of surveillance activities, inspections, and calibrations required by the Technical Specifications and the Fire Protection Program (5 years).
4. Records of sealed source and fission detector leak tests and results (5 years).
5. Records of annual physical inventory of all sealed source material of record (5 years).
6. Records of reactor tests and experiments (lifetime).
7. Records of inservice inspections performed pursuant to the Technical Specifications (lifetime).
8. Records of quality assurance activities required by the NQAP not listed in items 1 through 5 above and which are classified as permanent records by applicable regulations, codes, and standards (lifetime).
9. Records of 50.59 screening reviews and evaluations performed for changes made to equipment pursuant to 10 CFR 50.59 (lifetime). Records of 50.59 screening reviews and evaluations performed for changes made to procedures or tests and experiments pursuant to 10 CFR 50.59 (5 years).
10. Records of the reviews required by NQAP Sections 9.9.2 and 4.1.7C (lifetime).
11. Records of the service lives of all hydraulic and mechanical snubbers required by Technical Requirement (TR) 3.7.3, "Snubbers," including the date at which the service life commences, and associated installation and maintenance records (lifetime).
12. Records of secondary water sampling and water quality (lifetime).
13. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date (these records should include procedures effective at specified times and QA records showing that these procedures were followed (lifetime).
14. Records of reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program (lifetime).
15. Records of steam generator tube surveillance (lifetime).

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16. Records of screening reviews and evaluations performed for changes made to the facility, spent fuel storage cask design, procedures, tests or experiments pursuant to 10 CFR 72.48 (retained for the life of the Storage Cask License).
 17. Records required by 10 CFR 72 (retained for the life of the Storage Cask License).
- G. In addition to the records specified in Appendix A to ANSI N45.2.9-1974, the following records and retention times are applicable to **SN**:
1. Licensee Event Reports required by 10 CFR 50.73 (five years).
 2. Records of surveillances activities, inspections and calibrations required by the Technical Specifications (five years).
 3. Records of changes made to the procedures required by NQAP 9.9.2A.2 for SN only (five years).
 4. Records of sealed source and fission detector leak tests and results (five years).
 5. Records of annual physical inventory of all sealed source material of record (five years).
 6. Records of gaseous and liquid radioactive material released to the environs and the resulting calculated dose to an individual member of the public (lifetime).
 7. Records of reactor tests and experiments (lifetime).
 8. Records of in-service inspections performed pursuant to the Technical Specifications (lifetime).
 9. Records of 50.59 screening reviews and evaluations performed for changes made to equipment pursuant to 10 CFR 50.59 (lifetime). Records of 50.59 screening reviews and evaluations performed for changes made to procedures or tests and experiments pursuant to 10 CFR 50.59 (5 years).
 10. Records of analyses required by the radiological environmental monitoring program (lifetime).
 11. Records of secondary water sampling and water quality (lifetime)
 12. Records of the service life monitoring of all safety-related hydraulic and mechanical snubbers, required by the Technical Requirements Manual, including the maintenance performed to renew the service life (lifetime).

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13. Records for Environmental Qualification which are covered under the provisions of Paragraph 2.c (12) (b) of License No. DPR-77 (lifetime).
 14. Records of reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program (lifetime).
 15. Records required by 10 CFR 72 (retained for the life of the Storage Cask License).
 16. Records of screening reviews and evaluations performed for changes made to the facility, spent fuel storage cask design, procedures, tests or experiments pursuant to 10 CFR 72.48 (retained for the life of the Storage Cask License).
- H. In addition to the records specified in Appendix A to ANSI N45.2.9-1974, the following records and retention times are applicable to **BFN**. These records shall be kept in a manner convenient for review.
1. Reportable Events
 2. Checks, inspections, tests and calibrations of components and systems, including such diverse items as source leakage.
 3. Records of 50.59 screening reviews and evaluations performed for changes made to equipment pursuant to 10 CFR 50.59 (lifetime). Records of 50.59 screening reviews and evaluations performed for changes made to procedures or tests and experiments pursuant to 10 CFR 50.59 (5 years).
 4. Records of screening reviews and evaluations performed for changes made to the facility, spent fuel storage cask design, procedures, tests or experiments pursuant to 10 CFR 72.48 (retained for the life of the Storage Cask License).
 5. Test results in units of micro curies for leak tests.
 6. Record of annual physical inventory verifying accountability of sources on record.
 7. Records of gaseous and liquid radioactive waste released to the environs, and the resulting calculated dose to individual members of the public
 8. Reactor coolant system inservice inspection.
 9. Records required by 10 CFR 72 (retained for the life of the Storage Cask License).
 10. Design fatigue usage evaluation.

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Monitoring and recording requirements below will be met for various portions of the reactor coolant pressure boundary (RCPB) for which detailed fatigue usage evaluation per the ASME Boiler and Pressure Vessel Code Section III was performed for the conditions defined in the design specification. In this plant, the applicable codes require fatigue usage evaluation for the reactor pressure vessel only. The locations to be monitored shall be:

- The feedwater nozzles
- The shell at or near the waterline.
- The flange studs.

Transients that occur during plant operations will be reviewed and a cumulative fatigue usage factor determined.

For transients which are more severe than the transients evaluated in the stress report, code fatigue usage calculations will be made and tabulated separately.

In the annual operating report, the fatigue usage factor determined for the transients defined above shall be added and a cumulative fatigue usage factor to date shall be reported. When the cumulative usage factor reaches a value of 1.0, an in-service inspection shall be included for the specific location at the next scheduled inspection (3-1/3-year interval) period and 3-1/3-year intervals thereafter, and a subsequent evaluation performed in accordance with the rules of ASME Section XI Code if any flaw indications are detected. The results of the evaluation shall be submitted in a Special Report for review by the Commission.

11. Reviews performed for changes made to the Offsite Dose Calculation Manual and the Process Control Program.

Except where covered by applicable regulations, items 1 through 5 above shall be retained for a period of at least five years and items 6 through 9 shall be retained for the life of the plant. A complete inventory of radioactive materials in possession shall be maintained current at all times.

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NRC 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," Revision 1, 4/76, endorses ANSI N45.2.5-1974.

The NQAP follows this Guide with the following alternatives:

- A. The qualification requirements for quality control (QC) inspectors are stated in our position on Regulatory Guide 1.58 in this table.
- B. Testing frequency and QC acceptance criteria for concrete construction is described in the Safety Analysis Report for each plant.
- C. Burning of bolt holes is acceptable when specifically approved by engineering.
- D. The installation method for high strength bolting may be either the automatic cutoff impact wrench method, turn-of-nut method, or direct tension indicator method.
- E. Torque wrench inspection of completed connections installed by the turn-of-nut method shall not be required but may serve to resolve disagreements concerning the results of inspection of bolt tension.
- F. Torque wrench inspection of the load indicator washer type of direct tension indicator shall not be required.
- G. Bolts shall be considered long enough if the bolt point is flush with or outside the face of the nut.
- H. When specified by the design output document, TVA's alternative for visual welding acceptance criteria will be NCIG-01, May 7, 1985, Revision 2, "Visual Weld Acceptance Criteria for Structural Welding of Nuclear Power Plants."
- I. For modifications or repairs to structures within the scope of N45.2.5-1974, plant management shall refer to the Site Engineering organization for any design analyses.
- J. Verification of pre-weld activities, including fit-up, will be verified through a graded QC inspection program, unless 100 percent inspection is specified in design output documents.
- K. Much of N45.2.5 applies to construction and pre-operational testing. As a result, many of the listed tests are not appropriate in an operational plant. In lieu of this, TVA utilizes the appropriate engineering organizations to establish the need for specific tests or test procedures during the operational phase, and the guidance provided in ANSI N45.2.5-1974 is considered for applicability.

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- L. TVA implements the requirements of N45.2.5 Section 3, 4, and 5 with a performance-based graded QA verification program consisting of quality control inspection, line verification, and quality assessments.

NRC Regulatory Guide 1.116 - "Quality Assurance Requirements for the Installation, Inspection, and Testing of Mechanical Equipment and Systems," 6/76, endorses ANSI N45.2.8-1975.

The NQAP follows this Guide with the following alternatives:

- A. QA programmatic/administrative requirements included in the Regulatory Guide shall apply to construction, maintenance, and modification activities. Technical requirements associated with maintenance and modifications shall be the original requirements or better (e.g., code requirements, material properties, design margins, manufacturing processes, and types of inspection requirements).
- B. Much of N45.2.8 applies to construction and pre-operational testing. As a result, many of the listed tests are not appropriate in an operational plant. In lieu of this, TVA utilizes the appropriate engineering organizations to establish the need for specific tests or test procedures during the operational phase and the guidance provided in ANSI N45.2.8-1975 is considered for applicability.
- C. TVA implements the requirements of N45.2.8 Sections 4.4 and 5.1 with a performance based, graded QA verification program consisting of quality control inspection, line verification, and quality assessments.

NRC Regulatory Guide 1.123 - "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants," Revision 1, 7/77, endorses ANSI N45.2.13-1976.

The NQAP follows this Guide with the following alternative:

- A. Section 4.2 - In the special case of "commercial grade items": the supplier may not be evaluated by one of the methods identified; however, the procurement documents shall contain acceptance requirements (special receipt inspection requirements, special tests, or functional tests) specific to the item being procured. The acceptance (dedication) of commercial grade items intended for safety-related applications meets the intent of EPRI NP-5652 as accepted by the NRC.
- B. Section 7.5 - Personnel responsible for performing verification activities are qualified in accordance with ANSI N45.2.6 or ANSI N45.2.23 as applicable.

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- C. Section 3.2.3 - When purchasing commercial grade calibration or testing services from a laboratory holding accreditation by an accrediting body recognized by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA), commercial grade surveys need not be performed provided each of the following conditions are met:

(NOTE: Neither ISO/IEC-17025:2005 nor ISO/IEC-17025:2017 is allowed after November 30, 2020. Following a revision to NEI 14-05, "Guidelines for the Use of Accreditation in lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services, the NRC will evaluate ISO/IEC-17025:2017 for use after November 30, 2020)

1. A documented review of the supplier's accreditation is performed and includes a verification of the following:
 - a. The calibration or test laboratory holds accreditation by an accrediting body recognized by the ILAC MRA. The accreditation encompasses ISO/IEC-17025:2005 or ISO/IEC-17025:2017, "General Requirements for the Competence of Testing and Calibration Laboratories."
 - b. For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties.
 - c. For procurement of testing services, the published scope of accreditation for the test laboratory covers the needed testing services including test methodology and tolerances/uncertainty.
2. The purchase documents require that:

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- a. The service must be provided in accordance with their accredited ISO/IEC-17025:2005 or ISO/IEC-17025:2017 program and scope of accreditation.
 - b. As-found calibration data must be reported in the certificate of calibration when calibrated items are found to be out-of-tolerance. (for calibration services only)
 - c. The equipment/standards used to perform the calibration must be identified in the certificate of calibration. (for calibration services only)
 - d. The customer must be notified of any condition that adversely impacts the laboratory's ability to maintain the scope of accreditation.
 - e. Additional technical and quality requirements, as necessary, based upon a review of the procured scope of services, which may include, but are not necessarily limited to, tolerances, accuracies, ranges, and industry standards.
 - f. Services shall not be subcontracted to any other supplier.
3. It is validated, at receipt inspection, that the laboratory's documentation certifies that:
- a. The contracted calibration or test service has been performed in accordance with their ISO/IEC-17025:2005 or ISO/IEC-17025:2017 program, and has been performed within their scope of accreditation, and
 - b. The purchase order's requirements are met.

NRC Regulatory Guide 1.144 - "Auditing of Quality Assurance Programs for Nuclear Power Plants," Revision 1, 9/80, endorses ANSI N45.2.12-1977.

The NQAP follows this Guide with the following alternatives:

- A. Paragraph 2.3 - Technical specialists who assist in performing audits in their area of special expertise will perform their audit duties under the supervision of a certified lead auditor.
- B. TVA implements the requirements of Regulatory Guide paragraph C.3.a and Sections 3.4 and 3.5 of ANSI N45.2.12 with a performance-based, graded QA audit program. Real time adjustments are made to the audit scope, depth, and frequency based on an item's or subject's importance to safety and performance history. Real-time adjustments allow emphasis to be placed in areas where performance is weak and decrease emphasis where performance is evaluated to be good.
- C. Section 4.5.2 - QA will have a certified lead auditor or a manager of the auditor either conduct the required follow up or attest to the acceptability of the follow up conducted by audit personnel.

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D. Regulatory Guide 1.144, Section C.3.b(2):

When purchasing commercial grade calibration or testing services from a laboratory holding accreditation by an accrediting body recognized by the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA), commercial grade surveys need not be performed provided each of the following conditions are met:

(NOTE: Neither ISO/IEC-17025:2005 nor ISO/IEC-17025:2017 is allowed after November 30, 2020. Following a revision to NEI 14-05, "Guidelines for the Use of Accreditation in lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services," the NRC will evaluate ISO/IEC-17025:2017 for use after November 30, 2020)

1. A documented review of the supplier's accreditation is performed and includes a verification of the following:
 - a. The calibration or test laboratory holds accreditation by an accrediting body recognized by the ILAC MRA. The accreditation encompasses ISO/IEC-17025:2005 or ISO/IEC-17025:2017, "General Requirements for the Competence of Testing and Calibration Laboratories."
 - b. For procurement of calibration services, the published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties.
 - c. For procurement of testing services, the published scope of accreditation for the test laboratory covers the needed testing services including test methodology and tolerances/uncertainty.
2. The purchase documents require that:
 - a. The service must be provided in accordance with their accredited ISO/IEC-17025:2005 or ISO/IEC-17025:2017 program and scope of accreditation.
 - b. As-found calibration data must be reported in the certificate of calibration when calibrated items are found to be out-of-tolerance. (for calibration services only)
 - c. The equipment/standards used to perform the calibration must be identified in the certificate of calibration. (for calibration services only)
 - d. The customer must be notified of any condition that adversely impacts the laboratory's ability to maintain the scope of accreditation.

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e. Additional technical and quality requirements, as necessary, based upon a review of the procured scope of services, which may include, but are not necessarily limited to, tolerances, accuracies, ranges, and industry standards.

f. Services shall not be subcontracted to any other supplier.

3. It is validated, at receipt inspection, that the laboratory's documentation certifies that:

a. The contracted calibration or test service has been performed in accordance with their ISO/IEC-17025:2005 or ISO/IEC-17025:2017 program, and has been performed within their scope of accreditation, and

b. The purchase order's requirements are met.

NRC Regulatory Guide 1.146 - "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants," 8/80, endorses ANSI N45.2.23-1978.

The NQAP follows this Guide with the following alternative:

A. In addition to the State agencies and technical societies recognized by ANSI N45.2.23, Section 2.3.1.3, TVA may grant two points for professional competency to those individuals licensed as either a Reactor Operator (RO) or Senior Reactor Operator (SRO) by the NRC.

B. Replace Section 2.3.4 of ANSI N45.2.23 with the following:

"Prospective Lead Auditors shall demonstrate their ability to effectively implement the audit process and effectively lead an audit team. This process is described in written procedures which provide for evaluation and documentation of the results of this demonstration. A prospective Lead Auditor shall participate in at least one nuclear quality assurance audit within the year preceding the individual's effective date of qualification."

NRC Regulatory Guide 1.152 - "Criteria For Programmable Digital Computer System Software in Safety-Related Systems of Nuclear Power Plants," November 1985, endorses ANSI/IEEE-ANS-7-4.3.2-1982.

The NQAP follows this Guide consistent with Section D of the Guide, with the following alternative:

"For programmable digital computer system software installed in safety-related protection systems, TVA will follow this guide for the verification and validation of program elements specified in Sections 13.2G and 13.2H of the NQAP."

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Guidelines for Determination of TVA Identified Quality-Related Classifications

1.0 INTRODUCTION

The guidelines for classifying components, systems, and activities as quality related depend on the relationship of the terms quality related and safety related as discussed in 2.0 and 3.0 below. The guidelines are contained in Section 4.0 of this Appendix.

2.0 QUALITY-RELATED

- A. Quality-related (QR) is a term, which encompasses quality assurance program requirements that describe activities, which affect structures, systems, and components. These requirements provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public. In addition to safety-related structures, systems, components, and activities, the term "quality-related" encompasses the broad class of plant features covered (not necessarily explicitly) in the General Design Criteria of 10 CFR 50, Appendix A, that contribute in an important way to the safe operation and protection of the public in all phases and aspects of facility operation (i.e., normal operation and transient control as well as accident mitigation).
- B. Quality-related is more encompassing than the term safety related. Appendix D shows the scope of the Nuclear Quality Assurance Program. All quality-related items and activities are not necessarily safety-related. Appendix D illustrates the programmatic relationships.

3.0 SAFETY-RELATED

- A. Use of the term safety-related (or variations thereof) and the methodology for classifying items and activities as safety-related has been established in the General Design Criteria and Safety Analysis Report for BFN, SQN, WBN and BLN. The term safety-related as used in this appendix, this program description and other Nuclear Quality Assurance Program documents is generic in nature.
- B. Items and activities classified as safety-related are subject, without exception, to the requirements of 10 CFR 50, Appendix B. All safety-related items and activities are also quality-related.

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Guidelines for Determination of TVA Identified Quality-Related Classifications

4.0 GUIDELINES

Some items and activities are classified as quality-related but not safety-related. However, because some items and activities classified as quality-related are considered important to the continued reliable operation of TVA's nuclear facilities, TVA shall apply the requirements of all or selected parts of the NQAP to such items and activities.

- A. Structures, systems, and components shall be classified as quality-related but not safety-related if they fit one or more of the following categories:
 1. Contain radioactive material and have not been identified as safety-related.
 2. Are required by ANS 3.2/ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," and are not identified as safety-related (e.g., plant security system).
 3. Are fire protection features that provide protection for safety-related structures, systems, or components.
 4. Are structures, systems, and components that have environmental or operability requirements important to the safe operation of the unit (as specified in the Plant Technical Specifications).
 5. Are structures, systems, and components that could impact reliability and operability goals recommended by TVA Nuclear management and approved by the Senior Vice President and CNO.
- B. Those components or systems designated as Seismic Category I (L) (Class II for BFN) in nuclear plant FSARs shall be classified as quality-related. Seismic Category I (L) is the non-safety-related portion of Seismic Category I. (Refer to Appendix D.)
- C. Additional components or systems, not identified in the FSARs as NNS or Seismic Category I (L,) can be designated as quality-related but not safety-related. Such additional components or systems could include the following:
 1. Plant security system.
 2. Plant radiological controls and radwaste systems.
 3. Other structures, systems, and components which have special environmental or operability requirements.
 4. Structures, systems, or equipment designated by TVA Nuclear management as requiring some level of quality control because of their importance to plant reliability or operability.

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Guidelines for Determination of TVA Identified Quality-Related Classifications

4.0 GUIDELINES (continued)

- D. Items to which one or more of the following regulatory documents are applicable should be considered for classification as quality-related.
1. Regulatory Guide 1.143, "Design Guidance for Radioactive Waste Management Systems, Structures, and Components Installed in Light-Water-Cooled Nuclear Power Plants."
 2. 10 CFR 71, Subpart H, "Quality Assurance (Packaging and Transportation of Radioactive Material)."
 3. Regulatory Guide 1.29, "Seismic Design Classification."
 4. 10 CFR 73.55, "Requirements for Physical Protection of Licensed Activities in Nuclear Power Reactors Against Radiological Sabotage."
 5. 10 CFR 50.62, "Requirements for Reduction of Risk From Anticipated Transients Without Scram (ATWS) Events for Light-Water-Cooled Nuclear Power Plants."
 6. 10 CFR 50, Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979."
 7. ANS 3.2/ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."
 8. Regulatory Guide 1.33, Revision 2, February 1978, "Quality Assurance Program Requirements (Operation)."
 9. NRC letter from H. J. Thompson, Jr., dated April 16, 1985, "Quality Assurance Guidance for ATWS Equipment That is Not Safety Related," Generic Letter 85-06, (A02 850422 044).
 10. NRC letter from D. G. Eisenhut dated April 24, 1986, "Implementation of Fire Protection Requirements," Generic Letter 86-10 (A02 860512 005).
 11. NUREG 0737, "Clarification of TMI Action Plan Requirements."
 12. NUREG 0800, Section 9.5.1, Branch Technical Position, CMEB 9.5-1 (formerly BTP ASB 9.5-1), Revision 2, July 1981, "Fire Protection for Nuclear Power Plants."
 13. 10 CFR 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste.
 14. Nuclear Plant Fire Protection Functional Responsibilities, Administrative Controls, and Quality Assurance, (the "FRACQA Letter") - GL 77-02"

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4.0 GUIDELINES (continued)

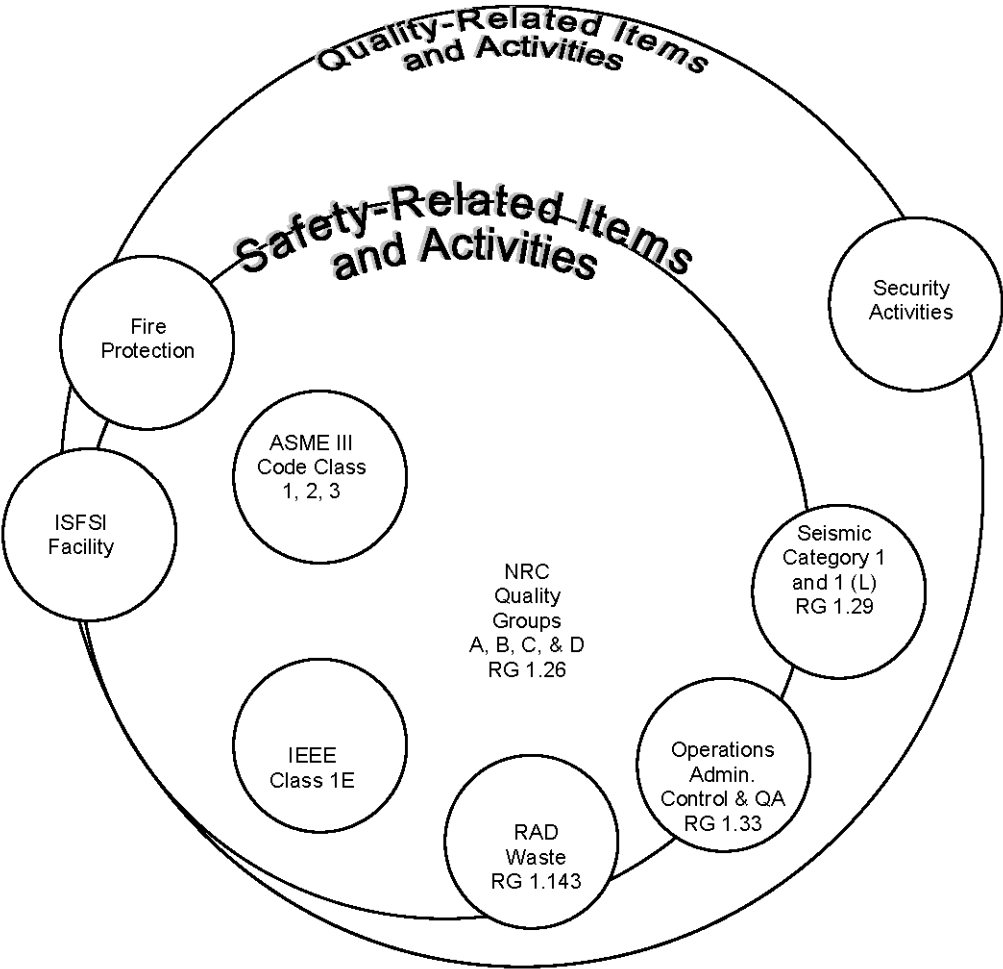
- E. New systems (or items being added as a result of approved modifications) shall be classified on the same basis as the existing components or systems.
- F. Classification of components or systems as quality-related but not safety-related shall be performed in accordance with approved corporate or site engineering procedures or at TVA Nuclear management direction.

5.0 CLASSIFICATION OF DRY CASK STORAGE SYSTEM

The Dry Cask Storage System is engineered to provide safe storage of spent fuel on the ISFSI pad. These components will be designated as important to Safety (ITS) classification category A, B, C in accordance with NUREG/CR-6407. For procurement purposes, 10 CFR 21 will apply to 10 CFR 72 ITS category A and B components. For onsite activities 10 CFR 72 ITS Category A and B components will be treated as safety-related under TVA Nuclear's existing QA Program. Similarly, 10 CFR 72 ITS Category C components will be treated as quality-related but not safety-related.

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Scope of Nuclear Quality Assurance Program



This diagram displays the relationship of safety-related to quality-related items and activities. Examples of these items and activities are shown. It is not intended to show each specific item and activity within the scope of the Nuclear QA Program.

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Computer Software

The requirements of Section 13.0 apply to application software, which performs any of the following:

- A. Directly operate safety-related plant equipment.
- B. Generates design output for the design of safety-related or quality-related functions, structures, systems, or components.
- C. Used by control room personnel, without further verification, to make plant operating decisions affecting:
 - 1. The integrity of the reactor coolant pressure boundary.
 - 2. The capability to shutdown the reactor and maintain it in a safe condition.
 - 3. The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to the applicable guideline exposures set forth in 10 CFR 50.34(a)(1) or 10 CFR 100.11, as applicable.
- D. Perform calculations, the results of which are used, without further verification to operate, maintain, inspect, or test safety-related or quality-related structures, systems, and components.
- E. Performs engineering calculations, the results of which are used, without further verification to support the design of safety-related and quality-related structures, systems, and components.
- F. Generates output used to procure safety- or quality- related items.
- G. Maintains, controls, or distributes information to be used without further verification in the procurement, design, operation, and maintenance of safety-related or quality-related structures, systems, and components.

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Quality Assurance Programs for Bellefonte Units 1 and 2

1.0 GENERAL

This appendix to the Tennessee Valley Authority (TVA) Nuclear Quality Assurance Plan (NQAP) describes the top level policy that assigns major functional responsibilities for activities conducted by or for TVA Bellefonte Units 1 and 2 (BLN) while the construction permits for the units remain in deferred status. The NQAP describes the methods and establishes the administrative control requirements that meet applicable 10 CFR 50, Appendix B requirements, NRC Generic Letter 87-15, "Policy Statement on Deferred Plants," and the BLN 1 & 2 construction permits as reinstated in accordance with the terms of the NRC order reinstating the BLN Units 1 & 2 construction permits, dated March 9, 2009.

Current TVA Nuclear programs and procedures that implement the NQAP, as well as the existing TVA Nuclear organizational structures, are primarily focused on an operating plant structure. This appendix is developed to take into account the unique requirements and commitments necessary to ensure effective quality assurance program implementation and oversight of BLN 1 & 2.

The execution and accountability for quality assurance for the BLN 1 & 2 units remains with TVA, but may be delegated to support contractors for specific tasks and activities. Contracted activities are implemented through a TVA approved contractor Nuclear Quality Assurance Manual (NQAM) or may be implemented through direct implementation of the TVA QA program through TVA procedures. TVA's review and approval of a contractor NQAM, and any changes thereto, ensures that regulatory requirements and TVA specific commitments of this NQAP are met. TVA retains and exercises the overall responsibility for the establishment and execution of an effective QA program for BLN 1 & 2.

Procedures and instructions that implement the requirements of the NQAP are developed prior to commencement of those activities and are reviewed and approved by TVA.

2.0 BACKGROUND

TVA's Power Supply Plan identifies the need for a flexible range of options and alternatives required to meet, among other things, the Tennessee Valley region's base load power for future years. Until decisions on generating options to meet future load forecasts are finalized, maintaining BLN 1 & 2 Units in a deferred status, is consistent with TVA's needs.

3.0 SCOPE/APPLICABILITY

This appendix applies to BLN 1& 2 plant activities while TVA evaluates, maintains and preserves the units for the consideration of possible reactivation of construction and completion activities. TVA will take the actions necessary to maintain and preserve the units in order to maintain the option of plant reactivation in accordance with Generic Letter 87-15, "Policy Statement on Deferred Plants" and the terms of the NRC order reinstating the BLN Units 1 & 2 construction permits, dated March 9, 2009.

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Quality Assurance Programs for Bellefonte Units 1 and 2

4.0 ORGANIZATION

This section describes the TVA organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying the implementation of quality assurance requirements for BLN 1 & 2. The organizational structure includes offsite and on-site functions including interface responsibilities for multiple organizations performing non-safety-related functions. Implementing documents assign more specific responsibilities and duties, and define the organizations interfaces involved in conducting activities and duties within the scope of this NQAP. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

The General Manager, QA, is responsible for ensuring that the TVA BLN QA organization is sized commensurate with assigned duties and responsibilities. This is accomplished through the use of a dedicated and experienced QA organization performing oversight activities both onsite and offsite, and applying the experience and lessons learned from the recent completion of Browns Ferry Unit 1 and Watts Bar Unit 2.

The following sections describe the reporting relationships, functional responsibilities, and authorities for organizations implementing and supporting the Nuclear Quality Assurance Program as it applies to BLN Units 1 & 2 in a terminated or deferred plant status. The TVA Nuclear organization is described herein.

4.1 President and Chief Executive Officer (CEO)

The CEO is responsible for all aspects of design, construction and operation of TVA's nuclear plants. The CEO is also responsible for all technical and administrative support activities provided by TVA and contractors. The CEO directs the Senior Vice President and CNO. The CEO also directs the executive responsible for resources and operations support. The CEO reports to the TVA Board of Directors with respect to all matters.

4.2 Management position responsible for nuclear projects

The management position responsible for nuclear projects reports to the Senior Vice President, Nuclear Engineering and Operations Support, and is responsible for the implementation of this NQAP for activities at BLN.

4.2.1 Management position responsible for BLN Project

The management position responsible for the BLN Project reports to the management position responsible for nuclear projects and is responsible for the overall implementation of quality assurance requirements in the areas specified by this NQAP for BLN 1 and 2 plant activities.

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Quality Assurance Programs for Bellefonte Units 1 and 2

4.2.2 TVA Nuclear Quality Assurance

The TVA Nuclear Quality Assurance organization is responsible for independently planning and performing activities to verify the effective implementation of the NRC approved NQAP described in this document for BLN 1 and 2 activities including, but not limited to engineering, QA/QC, licensing, document control, corrective action program, and procurement that support plant completion.

4.3 Senior Vice President, Resources and Operations Support

The Senior Vice President, Resources and Operations Support reports to the CEO and is responsible for managing the overall Administrative Services organization including assuring that Supply Chain Management support nuclear construction activities in accordance with the Nuclear Quality Assurance Program.

4.4 Senior Vice President and Chief Nuclear Officer (CNO)

The Senior Vice President and CNO reports to the CEO and is responsible for assuring that Inspection and Testing Services management support nuclear construction activities in accordance with the Nuclear Quality Assurance Program.

4.5 Senior Vice President, Nuclear Engineering and Operations Support

The Senior Vice President, Nuclear Engineering and Operations Support reports to the Senior Vice President and CNO. Organizations reporting to this position include nuclear engineering, operations support, outage scheduling and execution, and regulatory affairs and support services.

4.6 Authority to Stop Work

TVA Nuclear QA and Contractor quality assurance and inspection personnel have the authority, and the responsibility, to stop work in progress which is not being done in accordance with approved procedures or where safety or structure, system or component integrity may be jeopardized. This extends to off-site work performed by suppliers furnishing safety-related materials and services to TVA.

4.7 Organizational Independence

For the BLN Plant, independence shall be maintained between the organization performing the checking (quality assurance and quality control) functions and the organizations performing the functions. This provision is not applicable to design review/verification.

5.0 PROGRAM

- A. During the period that BLN units 1 & 2 remain in terminated or deferred status as described in Generic Letter 87-15, "Policy Statement on Deferred Plants" the Quality Assurance elements described in this appendix and the body of the NQAP will be accomplished through written, reviewed and approved procedures.

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Quality Assurance Programs for Bellefonte Units 1 and 2

5.0 PROGRAM (continued)

- B. Site procedures that were not used in the period of deferral before the construction permits were withdrawn were placed in inactive status. As activities necessary to consider the viability of construction completion are required, the applicable procedures will be reactivated, reviewed and reissued prior to the conduct of the activity.

6.0 PLANT EQUIPMENT POLICY

- A. An important factor in considering the viability of construction reactivation and completion includes the impact of equipment age on its continued suitability for use. Considerations regarding age degradation due to design life, outdated or obsolete equipment, design improvements, any impact associated with resource recovery activities, and economic feasibility to replace rather than preserve equipment indefinitely under a lay-up program must be taken into account given the age of certain existing equipment. For these reasons, in August 2003 TVA submitted and in May 2004 the NRC approved a change to the NQAP that allowed preventive maintenance to be terminated on selected equipment and to allow that equipment to be entered into the corrective action program as "deferred equipment". TVA procedure controls prohibited and will continue to prohibit "deferred equipment" from being used in nuclear safety related applications without further evaluation and having been fully restored or replaced.
- B. Structures, systems or components that have been affected in the course of resource recovery activities will likewise be entered in to the corrective action program and prohibited from being returned to service without evaluation and having been restored or replaced.

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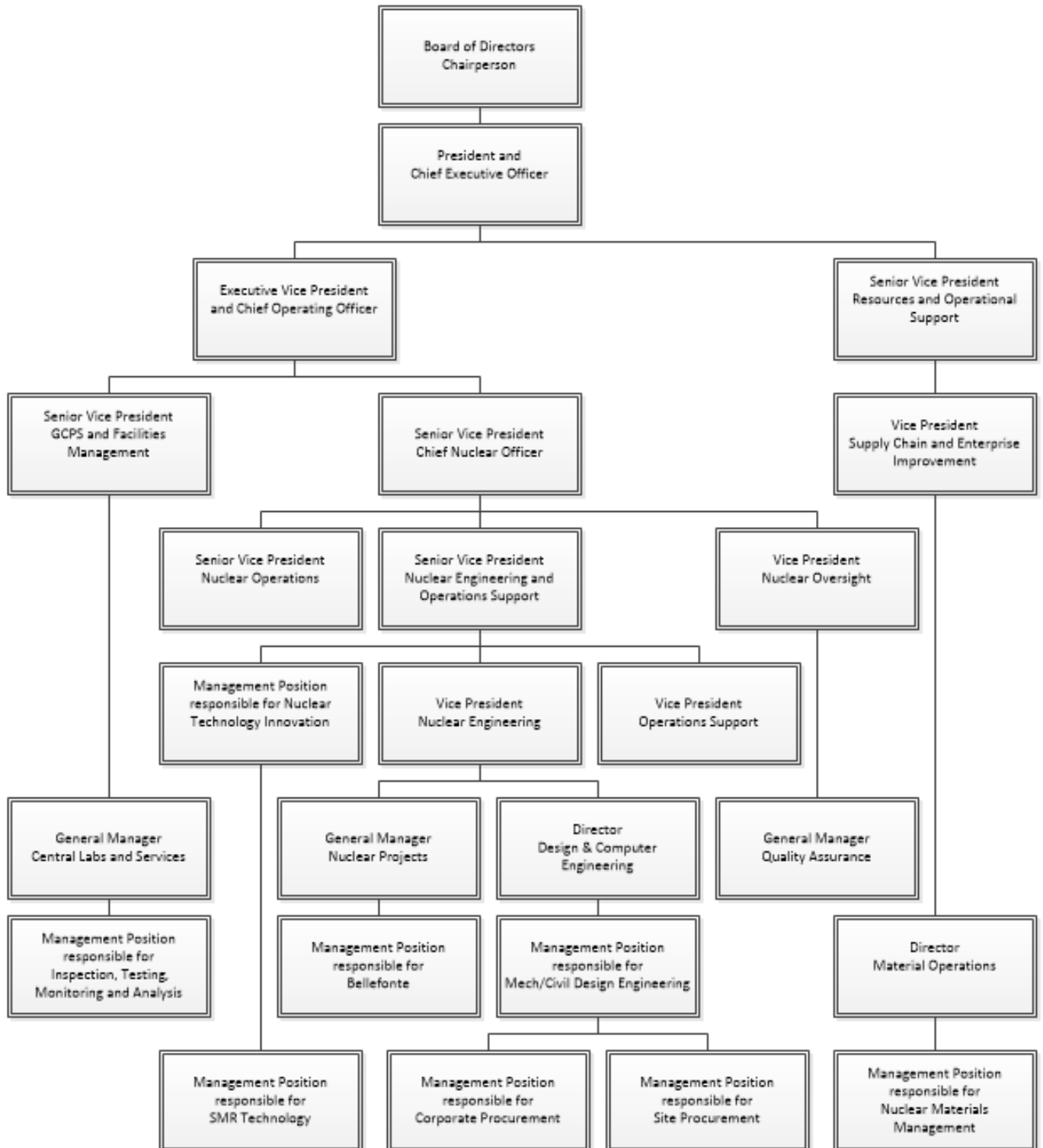
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Types of Controlled Documents and Manuals

- A. Design Specifications and Drawings
- B. Safety Analysis Reports for the 10 CFR 50 Reactor Power Facilities
- C. Program Manuals
- D. Plant Instructions
- E. Radiological Protection Plan
- F. Nuclear Engineering Procedures Manual
- G. Site Engineering Project Manuals
- H. ASME Section III Quality Assurance Manuals
- I. Nuclear Procedures System Manuals
- J. As-built Documents
- K. Computer Programs
- L. Non-conformance Reports
- M. Nuclear Quality Assurance Plan
- N. System Descriptions
- O. Topical Report
- P. Safety Analysis Reports for the 10 CFR 72 ISFSI Facilities
- Q. Radiological Emergency Plan
- R. Fire Protection Reports
- S. Part 52 Plants Safety Analysis Reports and QAPD

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TVA NQAP Organization Chart



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List Of Abbreviations

The following abbreviations are used in this program description:

AISC - American Institute of Steel Construction

ALARA - As Low as Reasonably Achievable

ANS - American Nuclear Society

ANSI - American National Standards Institute

ASL - Acceptable Suppliers List

ASME - American Society of Mechanical Engineers

ASME III QAM - ASME Section III Quality Assurance Manual

ASNT - American Society for Nondestructive Testing

ATWS - Anticipated Transient Without Scram

AWS - American Welding Society

BFN - Browns Ferry Nuclear Plant

BLN - Bellefonte Nuclear Plant

CEO - Chief Executive Officer

COO - Chief Operating Officer

CFR - Code of Federal Regulations

CRN - Clinch River Nuclear Site

DOE - Department of Energy

EPRI - Electric Power Research Institute

ESPA - Early Site Permit Application

ESP - Early Site Permit

FSAR - Final Safety Analysis Report

I&C - Instrument and Control

IEEE - Institute of Electrical and Electronics Engineers

ISFSI - Independent Spent Fuel Storage Installation

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List Of Abbreviations

ITS - Important to Safety

M&TE - Measuring and Test Equipment

NDE - Nondestructive Examination

NFPA - National Fire Protection Association

NNS - Non-nuclear Safety

NO - Nuclear Operations

NPS - Nuclear Procedures System

NQAP - Nuclear Quality Assurance Plan

NRC - Nuclear Regulatory Commission

NSRB - Nuclear Safety Review Board

NSSS - Nuclear Steam Supply System

PI - Performance Improvement

PORC - Plant Operations Review Committee

QA - Quality Assurance

QAPD - Quality Assurance Program Description

QC - Quality Control

SNM - Special Nuclear Material

SQN - Sequoyah Nuclear Plant

SSAR - Site Safety Analysis Report

SVP - Senior Vice President

TVA - Tennessee Valley Authority

TVAN - Tennessee Valley Authority Nuclear

WBN - Watts Bar Nuclear Plant

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Clinch River Nuclear Early Site Permit Project

1.0 SCOPE AND APPLICABILITY

This Appendix applies to CRN ESP Application (ESPA), ESP, and associated activities related to the design and/or construction activities affecting the quality and performance of safety-related structures, systems, and components.

2.0 ORGANIZATION FOR CLINCH RIVER

This section describes the TVA organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying the implementation of QA requirements for CRN. The organizational structure includes off-site and on-site functions including interface responsibilities for multiple organizations performing non-safety-related functions. Implementing documents assign more specific responsibilities and duties, and define the organizations interfaces involved in conducting activities and duties within the scope of this NQAP. See Appendix L for the CRN Organization Chart.

2.1 Management Position Responsible for Small Modular Reactor (SMR) Technology

The management position responsible for SMR Technology reports to the management position responsible for nuclear technology innovation. and is responsible to apply the appropriate NQAP requirements to the development of new nuclear generation projects.

The responsibilities of the management position responsible for SMR Technology include:

- Regularly review the status and adequacy of those parts of the NQAP, which they are executing;
- Develop, control, and maintain procedures and instructions as appropriate to implement quality-related activities and processes;
- Ensure appropriate controls for documents and records generated within the organization or received from external sources;
- Ensure appropriate controls are developed and implemented to maintain housekeeping and cleanliness requirements of facilities, systems, and components during the performance of work activities;
- Identify and resolve adverse conditions and perform related corrective action activities including assessing trends for internally and externally identified problems;
- Ensure personnel and resources are available during audit performance and ensure that audit responses and corrective actions are completed within established timeframes;
- Develop certification programs as appropriate and ensure that trained, qualified, and, where required, certified employees are used in the performance of quality-related activities; and

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Clinch River Nuclear Early Site Permit Project

2.1 Management Position Responsible for Small Modular Reactor (SMR) Technology (continued)

- Initiate stop work within their area of responsibilities when warranted.

2.2 SMR Licensing Manager

The SMR Licensing Manager reports to the management position responsible for SMR Technology and is responsible for implementing quality program requirements applicable to activities associated with licensing and for interfacing with the Nuclear Regulatory Commission. The SMR Licensing Manager's responsibilities include:

Providing licensing support for issuance of the ESP;

Maintaining and updating the SSAR; and

Managing Commitments and License Conditions.

2.3 SMR Operations and Training Program Manager

The SMR Operations and Training Program Manager reports to the management position responsible for SMR Technology and is responsible for development of programs and procedures for the indoctrination, training, qualification, and certification of those individuals performing work associated with the ESP.

The responsibilities of the SMR Operations and Training Program Manager include:

- Develop, initiate, conduct, and track project training requirements in accordance with NPG requirements;
- Ensures that re-qualification/continuing training is provided, as deemed necessary by the management position responsible for SMR Technology to ensure that job task proficiency is maintained; and
- Ensures that TVA temporary personnel assigned to perform work under the CRN ESP QA Program are adequately qualified and trained to perform assigned tasks. Any required training shall be completed prior to work performance.

2.4 SMR Project Manager

The SMR Project Manager reports to the management position responsible for SMR Technology and is responsible for interfacing and communicating with the contractors performing work associated with the ESP. The SMR Project Manager's responsibilities include:

- Provide oversight of assigned CRN contracts to ensure implementation of the contractor's QA program; and

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Clinch River Nuclear Early Site Permit Project

2.4 SMR Project Manager (continued)

- Clinch River Site owner's representative including quality related activities for developing the ESPA.

2.5 SMR Engineering Manager

The SMR Engineering Manager reports to the management position responsible for SMR Technology and is responsible for activities involved with the engineering and design for CRN. This position is also responsible for the oversight of design changes, configuration management and site specific data included in the ESPA. The SMR Engineering Manager's responsibilities include:

- Implement the independent review requirements for calculations or configuration changes by Nuclear Engineering;
- Maintain alignment with industry for engineering design and operational requirements via a common understanding of new and developing regulations along with practical insights of how to efficiently satisfy licensing requirements;
- Provide oversight of assigned CRN contracts to ensure implementation of the contractor's QA program;
- Ensuring appropriate design requirements are included in procurement documentation;
- Preparing, issuing, and reviewing applicable technical specifications, instructions, procedures, and drawings;
- Interfacing with the contractor design engineers and the Owners Engineer for site specific design activities;
- Ensuring suppliers develop, control, and distribute fabrication drawings in accordance with applicable codes and regulatory requirements;
- Ensuring inspection and test activities performed by suppliers are consistent with technical and regulatory requirements; and
- Maintaining Configuration Management and reviewing design documentation.

2.6 Delegation of work to ESP Vendors

The vendor organizations for quality related work shall meet the requirements of 10 CFR 50 App B. The work activities contracted to be performed under vendor QA programs are described in the TVA procurement documents.

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3.0 NRC REGULATORY GUIDES AND QUALITY ASSURANCE STANDARDS

Appendix M identifies the NRC Regulatory Guides and the other quality assurance standards which have been selected to supplement and support the TVA NQAP for the CRN ESP QA Program.

4.0 TRAINING AND QUALIFICATION - INSPECTION AND TEST

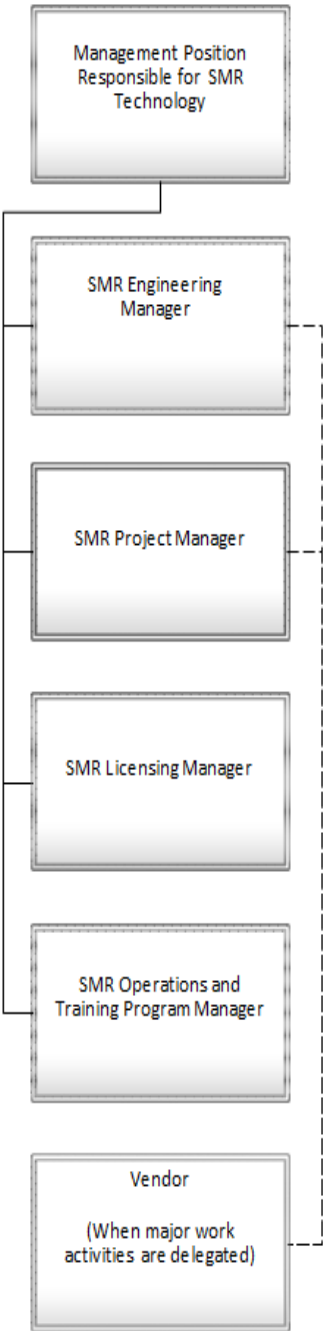
Inspections by persons during on-the-job training for qualification are performed under the direct observation and supervision of a qualified person and verification of the conformance is by the qualified person until certification is achieved.

5.0 ESP QA RECORDS

Sufficient records shall be maintained to furnish evidence of activities affecting quality related to the ESP for CRN. Typical records include but are not limited to: geotechnical data, topographic and geological maps, plot plans showing locations of major structures and explorations, boring logs and logs of explanatory trenches and excavations, geologic profiles showing excavation limits of structures, geophysical data, photographs of soil samples and rock cores, field and final logs of all borings, program or design plan, qualified investigation procedures, procurement control records, personnel qualification records, M&TE control and calibration records, test records, and procedures.

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Clinch River Nuclear Organization



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Clinch River Commitments and Clarifications for the ESP QA Program

1.0 NRC REGULATORY GUIDES AND QUALITY ASSURANCE STANDARDS

This section identifies the NRC Regulatory Guides and the other quality assurance standards which have been selected to supplement and support the TVA Clinch River Nuclear (CRN) Early Site Permit (ESP) Quality Assurance (QA) Program. TVA commits to compliance with these standards to the extent described herein, for the TVA NQAP as it applies to ESP at CRN. Commitment to a particular Regulatory Guide or other QA standard does not constitute a commitment to the Regulatory Guides or QA standards that may be referenced therein.

2.0 REGULATORY GUIDES AND GENERIC LETTERS

Regulatory Guide 1.26, Revision 4, March 2007 - Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants

Regulatory Guide 1.26 defines classification of systems and components.

TVA commits to the applicable regulatory position guidance provided in this regulatory guide for the CRN ESP QA program.

Regulatory Guide 1.28, Rev. 4, June 2010, Quality Assurance Program Requirements (Design and Construction)

Regulatory Guide 1.28 describes a method acceptable to the NRC staff for complying with the provisions of Appendix B with regard to establishing and implementing the requisite quality assurance program for the design and construction of nuclear power plants.

TVA commits to implementing equivalents or alternatives to the implementing documents endorsed in Regulatory Guide 1.28, Rev 4, Quality Assurance Program Criteria (Design and Construction), for the TVA NQAP as it applies to ESP at CRN. Section 3.0 of this Appendix contains the NQA-1 equivalent or alternatives used for the CRN ESP QA program.

Regulatory Guide 1.29, Revision 5, July 2016 - Seismic Design Classification

Regulatory Guide 1.29 defines systems required to withstand a safe shutdown earthquake (SSE).

TVA commits to the applicable regulatory position guidance provided in this regulatory guide for the CRN ESP QA program.

Regulatory Guide 1.37, Revision 1, March 2007 – Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants.

Regulatory Guide 1.37 provides guidance on specifying water quality and precautions related to the use of alkaline cleaning solutions and chelating agents.

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Clinch River Commitments and Clarifications for the ESP QA Program

2.0 REGULATORY GUIDES AND GENERIC LETTERS (continued)

Regulatory Position (RP) C.1, TVA commits to N45.2.1. Acceptable Codes and Standards are identified in N45.2.1, Section 3 and Section 12. This position is an equivalent RG 1.37 Rev. 1, RP C.1.

Regulatory Position C.2, TVA commits to N45.2.1. N45.2.1, Section 3.4, with the following clarification: "The water quality for final flushes of fluid systems and associated components should be at least equivalent to the quality of the operating system water." This position is an equivalent RG 1.37 Rev. 1, RP C.2.

Regulatory Position C.3, In lieu of the commitments identified in these position TVA commits to N45.2.1 and N45.2.15. These standards are equivalent to the NQA-1-1994 parts that are referenced. In addition the following clarification is added: A suitable chloride stress-cracking inhibitor should be added to the fresh water used to flush systems containing austenitic stainless steels. This position is an equivalent RG 1.37 Rev. 1, RP C.3.

TVA commits to the applicable regulatory position guidance provided in this regulatory guide for the CRN ESP QA program.

Regulatory Guide 1.152, Revision 3, July 2011 – Criteria for use of Computer in Safety Systems of Nuclear Power Plants.

TVA commits to the applicable regulatory position guidance provided in this regulatory guide for the CRN ESP QA program.

GL 91-05, April 1991 -Licensee Commercial-Grade Procurement and Dedication Programs

TVA commits to the applicable guidance provided in this generic letter for the CRN ESP QA program.

GL 89-02, March 1989 -Actions to Improve the Detection of Counterfeit and Fraudulently Marketed Products

TVA commits to the applicable guidance provided in this generic letter for the CRN ESP QA program.

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Clinch River Commitments and Clarifications for the ESP QA Program

3.0 STANDARDS

TVA commits to the guidance provided in the applicable requirements of these standards for ESP activities.

STANDARD	STANDARD TITLE	Clarifications and Additional Requirements
ANSI N45.2-1971	Quality Assurance Program Requirements for Nuclear Power Plants	
ANSI N45.2.1-1973	Cleaning of Fluid Systems and Associated Components During Construction Phase of Nuclear Power Plants	
ANSI N45.2.2-1972	Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants (During Construction Phase)	
ANSI N45.2.3-1973	Housekeeping during the Construction Phase of Nuclear Power Plants	
ANSI N45.2.4-1972	Installation, Inspection, and Testing Requirements for Instrumentation and Electric Equipment During the Construction of Nuclear Power Generating Stations	TVA commits to the applicable requirements for ESP with the approved alternatives as described in NQAP Appendix B.
ANSI N45.2.5-1974	Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete, Structural Steel During the Construction Phase of Nuclear Power Plants	

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Clinch River Commitments and Clarifications for the ESP QA Program

3.0 STANDARDS (continued)

ANSI N45.2.6-1978	Qualifications of Inspection, Examination, and Testing Personnel for Nuclear Power Plants	
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	
ANSI N45.2.9-1974	Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plant	
ANSI N.45.2.10-1973	Quality Assurance Terms and Definitions	
ANSI N.45.2.11-1974	Quality Assurance Requirements for the Design of Nuclear Power Plants	
ANSI N.45.2.12-1977	Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants	
ANSI N.45.2.13-1976	Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants	
ANSI N45.2.15-1981	Hoisting, Rigging, and Transporting of Items for Nuclear Power Plants	

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Clinch River Commitments and Clarifications for the ESP QA Program

3.0 STANDARDS (continued)

ANSI N45.2.20-1979	Supplementary Quality Assurance Requirements for Subsurface Investigations for Nuclear Power Plants	
ANSI N45.2.23-1978	Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants	TVA commits to the applicable requirements for ESP with the approved alternatives as described in NQAP Appendix B.
ANSI N18.7-1976 / ANS-3.2	Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants	TVA commits to the applicable requirements for ESP. Additionally, TVA CRN commits to Management of those organizations implementing the QA program, or portions thereof, assess the adequacy of that part of the program for which they are responsible and ensure its effective implementation at least once each year or at least once during the life of the activity, whichever is shorter.