

From: Chawla, Mahesh
Sent: Thursday, May 28, 2020 2:55 PM
To: Davis, J.Michael (J.Michael.Davis@nexteraenergy.com)
Cc: 'laura.swenzinski@nexteraenergy.com'; Weaver, Tracy; Catron, Steve (Steve.Catron@fpl.com); Mack, Jarrett
Subject: Request for Additional Information - Duane Arnold Energy Center Quality Assurance Topical Report (FPL-3) - EPID L-2020-LLQ-0002)

Dear Mr. Davis

On February 13, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20049A860), NextEra Energy Duane Arnold, LLC (NEDA, the licensee) submitted a request for approval of Quality Assurance Topical Report FPL-3. To support the transition of Duane Arnold Energy Center (DAEC) to a decommissioning facility, NEDA has developed a site-specific DAEC Quality Assurance Topical Report (QATR) FPL-3 using the QATR FPL-1 as the basis. QATR FPL-1 will no longer be effective at DAEC following approval and implementation of QATR FPL-3. The U.S. Nuclear Regulatory Commission (NRC) staff is reviewing the application and has determined that the following additional information is required in order to complete the review of the subject QATR.

Request for Additional Information

RAI-1

Regulatory Basis

Criterion XVII "Quality Assurance Records," of Appendix B to 10 CFR Part 50, states in part, that "records shall also include closely-related data such as qualifications of personnel..."

Standard Review Plan (NUREG-0800), Section 17.3 (SRP 17.3), "Quality Assurance Program Description" Section II.A.5 states, "Personnel training and qualification records are to be maintained."

Please clarify how the Quality Assurance Topical Report (QATR) FPL-3, specifically in paragraph A.5, maintains personnel training and qualification records or provide justification on why it is not needed.

RAI-2

Regulatory Basis

NUREG-0800 SRP 17.3 Section II.A.7 states in part, "the applicant is to comply with the regulatory positions in the appropriate revisions of the regulatory guides listed in Section VI.A of this chapter."

NUREG-0800 SRP 17.3 Section VI.A "References" lists Regulatory Guide 1.28, "Quality Assurance Program Requirements (Design and Construction)," using NQA-1 and NQA-2.

Please clarify why Regulatory Guide 1.28 is not listed in Paragraph A.7 but Duane Arnold Energy Center (DAEC) commits to Regulatory Guide 1.28 in the QATR FPL-3 Section B.4 and B.15.

Please let us know if you would like to have a clarification call with the NRC staff. If no clarification call is needed, please provide your response to the requested information on docket within 30 days of the receipt of this email. Thanks

Sincerely,

Mahesh Chawla, Project Manager
Plant Licensing Branch III
Division of Operating Reactor
Licensing
Office of Nuclear Reactor
Regulation
U.S. Nuclear Regulatory
Commission
ph: 301-415-8371

Docket No. 50-331

OFFICE	DORL/LPL3/PM	DORL/LPL3/BC
NAME	MChawla	NSalgado
DATE	5/19/20	5/28/20

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