ENERGY*SOLUTIONS*

February 25, 2022 ES-2022-002

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Subject: Response to Request for Additional Information Related to Energy*Solutions,* LLC Submittal for Approval of the Kewaunee Solutions Decommissioning Quality Assurance Program (DQAP), Revision 0 for Kewaunee Power Station (KPS)

Kewaunee Power Station
NRC Docket No. 50-305
NRC License No. DPR-43

References:
1. Letter from Stoddard, D.G. (Dominion Energy Kewaunee, Inc.), and Robuck, K. W. (Energy*Solutions* LLC), "Application for Order Approving Transfer of Control of KPS License and Conforming License Amendments," dated May 10, 2021.
2. Letter from van Noordennen, Gerard P. (Energy*Solutions*), "Kewaunee Solutions Decommissioning Quality Assurance Program (DQAP), Revision 0," dated September 16, 2021.
3. Letter from van Noordennen, Gerald P. (Energy*Solutions*), "Resubmittal of Kewaunee Solutions Decommissioning Quality Assurance Program (DQAP), Revision 0," dated September 29, 2021.
4. Letter from Watson, Bruce A. (U.S. Nuclear Regulatory Commission), "Dominion Energy Kewaunee, Inc. – Request for Additional Information Regarding Energy*Solutions,* LLC Submittal for Approval of Decommissioning Quality Assurance Program (EPID L-2021-DP3-0000)," dated February 2, 2022.

Dominion Energy Kewaunee, Inc. (DEK) and Energy*Solutions*, LLC (Energy*Solutions*) submitted an "Application for Order Approving Transfer of Control of KPS License and Conforming License Amendments" for Kewaunee Power Station (KPS) to the U. S. Nuclear Regulatory Commission (NRC) for review in a letter dated May 10, 2021 (Reference 1) (the "Application"). The Application stated Kewaunee Solutions, Inc. (the new name of the licensee DEK upon closing) would develop a Kewaunee Solutions Quality Assurance Program for KPS that would comply with 10 CFR 50.54(a).

Energy*Solutions* submitted the Kewaunee Solutions Decommissioning Quality Assurance Program (DQAP) for approval on September 16, 2021 (Reference 2). However, in that submittal, Energy*Solutions* had inadvertently marked the DQAP as "Proprietary Information." This marking was removed as a minor change in accordance with the applicable Energy*Solutions* procedure, without advancing the revision level of the DQAP. In a letter, dated September 29,

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2021(Reference 3), Energy*Solutions* resubmitted Revision 0 of the Kewaunee Solutions DQAP for NRC approval prior to implementation.

On February 2, 2022 (Reference 4), the NRC issued a Request for Additional Information (RAI) as the NRC staff identified that additional information was needed to complete its review of the Kewaunee Solutions DQAP. The RAI states:

> *The NRC staff requests that EnergySolutions provide a 10 CFR Section 50.54(a)(4) evaluation of the differences between the Kewaunee Solutions DQAP and DOM-QA-1, Revision 30 to demonstrate that the criteria within Appendix B to 10 CFR Part 50; 10 CFR Part 71, Subpart H; and 10 CFR Part 72, Subpart G have been met.*

This purpose of this letter is to provide the response to the RAI.

Attachment 1 provides Revision 1 of the Kewaunee Solutions DQAP. Attachment 2 provides the 10 CFR 50.54(a) Evaluation. Attachment 3 provides the Kewaunee Solutions DQAP Compliance Matrix to NUREG 1536. Attachment 4 provides the Kewaunee Solutions DQAP Compliance Matrix to NUREG 1757.

There are no regulatory commitments made in this submittal.

If the NRC has any questions, please contact me at 860-462-9707.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 25th day of February 2022.

Joseph R. Lynch Digitally signed by Joseph R. Lynch
Date: 2022.02.25 15:04:32 -05'00'

for, Gerard van Noordennen
Senior Vice President Regulatory Affairs
Energy*Solutions,* LLC

Attachments:

1. Kewaunee Solutions Decommissioning Quality Assurance Program (DQAP), Revision 1 (30 Pages)
2. 50.54(a) Evaluation (44 Pages)
3. KS DQAP Compliance Matrix to NUREG 1536 (56 Pages)
4. KS DQAP Compliance Matrix to NUREG 1757 (27 Pages)

Cc: w/ Enclosures

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ATTACHMENT 1

KEWAUNEE SOLUTIONS
DECOMMISSIONING QUALITY ASSURANCE PROGRAM (DQAP)

REVISION 1

30 PAGES

KEWAUNEE POWER STATION

KEWAUNEESOLUTIONS

Kewaunee Solutions
Decommissioning Quality Assurance Program
(DQAP)
Revision 1

QA Manager Prepared By:

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[Joe Lynch for G. van Noordennen per designation]

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02/24/2022

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Kewaunee Solutions President Approval:

02/24/2022

Ken Robuck, Kewaunee Solutions President — **Date**

Introduction

On February 25, 2013 Dominion Energy Kewaunee (DEK) certifed to the Nuclear Regulatory Commission (NRC) that operations at Kewaunee Power Station (KPS) would permanenetly cease in accordance with 10 CFR 50.82(a)(1)(i). On May 14, 2013 DEK certified to the NRC that the fuel had been permanently removed from the reactor vessel in accordance with 10 CFR 50.82(a)(1)(i). The transfer of all spent fuel from the spent fuel pool to the Independent Spent Fuel Storage Facility (ISFSI) was completed in 2017, and the facility was placed in the SAFSTOR condition.

On May 10, 2021 DEK and Energy*Solutions* submitted a request to the NRC to transfer control of the renewed facility operating license DPR-43 ("License") for KPS, as well as the 10 CFR 72.210 general license for the on-site ISFSI, from DEK's parent entity, Dominion Nuclear Projects, Inc. (Dominion), to Energy*Solutions* so as to implement the accelerated decommissioning of the KPS. This will include changing the plant status from SAFSTOR to DECON. Upon license transfer, the name of KPS Licensee will change to Kewaunee Solutions.

To address this changing environment at KPS, a Kewaunee Solutions Decommissioning Quality Assurance Program (DQAP) has been developed to support station activities and the operation of the Independent Spent Fuel Storage Installation (ISFSI).

The DQAP reflects the quality activities pertaining to a decommissioning nuclear site through compliance with established regulatory requirements set forth by the NRC. The DQAP ensures the protection of the public health and safety through performance-based assessments and compliance-based auditing utilizing implementing procedures and instructions. The DQAP describes the responsibilities for implementing important to safety requirements, establishing and maintaining the DQAP, and assessing the performance of activities subject to the DQAP. The implementation of the DQAP is executed through implementing procedures in a graded approach commensurate with the items' and activities' importance to safety.

The DQAP includes a general description of the organizational structure and functional responsibilities of station management regarding the implementation of important to safety activities and key facility activities at KPS. The DQAP also outlines the key responsibilities for the Quality Assurance (QA) staff and program expectations for the various station organizations. The DQAP satisfies the requirements of 10 CFR 50 Appendix B; 10 CFR 71 Subpart H; and 10 CFR 72 Subpart G. Additional regulatory commitments are listed within Appendix C of the DQAP.

The DQAP is considered a Quality Assurance Project Plan (QAPP) under the Energy*Solutions* QA Program (ES-QA-PG-001). The DQAP provides controls that are equivalent with the requirements of ES-QA-PG-001, and is subject to documented assessment versus future revisions to ES-QA-PG-001.

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1 ORGANIZATION

1.1 General

1.1.1 Kewaunee Solutions (KS) is responsible for the establishment and execution of the Quality Assurance Program for the Kewaunee Power Station (KPS). The KS organizational structure of functions involved with implementing the DQAP as well as associated interfaces, is described below. A high level organizational structure of functional areas involved is also presented in Appendix A of the DQAP. The titles of managers used in the DQAP are generic; their functional titles and their formal titles may vary. Actual reporting structure may include intermediate positions not shown on Appendix A of the DQAP. Unless otherwise specifically prohibited, responsibilities of managers as described in the DQAP may be delegated to, and performed by, other qualified individuals.

1.1.2 The ultimate responsibility for operation, maintenance, inspection, test, modification, decommissioning, and storage of spent fuel resides with the Kewaunee Solutions President. The President has corporate resposibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure safe management of nuclear fuel. The General Manager (GM) reports to the Kewaunee Solutions President, and has the overall responsibility for the establishment and execution of the DQAP.

1.1.3 Onsite and offsite organizations shall be established for decommissioning activities. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear fuel.

1.1.4 Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to include all organizational positions responsible for decommissioning activities. These relationships shall be documented and updated as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation.

1.2 Responsibilities

1.2.1 The authorities and duties of persons and organizations performing activities affecting the important to safety functions of the Structures, Systems, and Components (SSC) as identified in Appendix B of the DQAP are established and delineated in writing. These activities include both the performing functions of attaining quality objectives and the QA functions.

1.2.2 The General Manager (GM) is responsible for spent fuel safety, decommissioning of the station and nuclear oversight. The DQAP is reviewed and approved by the Quality Assurance Manager (QAM), and the GM.

1.2.3 The GM shall be responsible for overall management of the KPS decommissioning and associated site support functions. The individual shall delegate in writing the succession to this responsibility during their absence.

1.2.4 The GM is responsible for apprising management of the effectiveness of the DQAP implementation and is the arbitrator for non-conformances of unusual complexity. The GM also directs actions to be taken based on reports and trending of quality issues submitted by the QAM. Direction for implementing the DQAP activities is provided by the GM through the QAM.

1.2.5 Management of line organizations at KPS are responsible to ensure that the quality of organizational work and activities meets the requirements set forth in the DQAP and KPS implementing procedures.

1.3 Quality Assurance

1.3.1 The QAM reports to the GM and shall not be assigned responsibilities that would prevent the required attention to important to safety matters. Although reporting to the GM with other line organizations, the QAM shall have the necessary independence from other line management to ensure effective oversight for all organizations. The QAM while located off-site, shall delegate management of day-to-day oversight of implementation of the DQAP for all important to safety activities to on-site Quality Assurance (QA) personnel for which the QAM retains responsibility. The QAM has the following responsibilities:

A. Authority and obligation to raise any conditions adverse to quality that are not otherwise effectively resolved via the KS Corrective Action Program to the GM for resolution

B. Assuring important to safety activities at KPS are performed in accordance with implementing procedures

C. Managing the performance of audits, surveillances, and inspections in order to verify that important to safety activities have been correctly performed

D. Establishing lines of communication and control measures between the QA organization and suppliers to ensure appropriate QA program direction and provide for resolution of QA issues

E. Reporting on oversight activities to the GM

F. Authority to stop work when quality is adversely affected

1.3.2 Quality Assurance (QA) personnel report directly to the QAM and implement the relevant provisions of the DQAP utilizing written implementing procedures. They perform independent oversight of line functions and activities. A member of the QA organization shall not perform oversight of activities for which the member has direct responsibility. Further, they have the responsibility and authority to stop work when quality is adversely affected and immediately raise concerns to the QAM.

1.3.3 QA personnel shall have sufficient authority and organizational freedom to identify any quality problems and to verify implementation of corrective actions. Additionally, QA personnel shall have direct access to appropriate levels of management necessary to perform their function and shall be independent from cost and schedule when opposed to quality and nuclear safety considerations.

1.3.4 The individuals who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

1.4 Station Management

1.4.1 The GM delegates to the KS management team the day-to-day responsibilities for the ISFSI and decommissioning. The GM has periodic meetings with the management team to review plans and progress and to address stakeholder, quality, and project management issues. The managers described below report to the GM.

1.4.2 The Decommissioning Plant Manager (DPM) is responsible for overall safety of plant operations and decommissioning site operations, including fire protection activities at the decommissioning site, and shall delegate in writing the succession to this position during their absence. The DPM shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affect the safe storage of nuclear fuel, and shall have control over those onsite activities necessary for safe storage of the nuclear fuel. The DPM is responsible for implementing the Independent Safety Review (ISR) function in accordance with Appendix D of the DQAP.

1.4.3 The Radiation Protection Manager is responsible for all Radiation Protection (RP) program implementation activities, including RP operations, RP engineering and the as low as reasonably achievable (ALARA) Program.

1.4.4 The Engineering Manager is responsible for the engineering of ISFSI and decommissioning activities, and ensuring adequate technical review is applied to changes, tests and experiments. This includes engineering related to dry fuel storage of fuel / Greater-than-Class C (GTCC) waste, as well as configuration control of the facility.

1.4.5 The Licensing Manager (LM) is responsible for the day-to-day licensing activities, interfaces with the Nuclear Regulatory Commission (NRC), and is the Single Point of Contact for licensing and regulatory matters and concerns. The LM is responsible for assessing DQAP changes for determining compliance with licensing basis requirements, and for managing submittals to the NRC.

1.4.6 The Waste Manager is responsible for implementing radioactive waste, hazardous waste, mixed waste activities, and waste shipments, including Low Level Radioactive Waste (LLRW) products and services scope provided to KS by Energy*Solutions* or other suppliers.

1.4.7 The ISFSI Manager is responsible for overseeing all ISFSI activities, including ISFSI Operations and Maintenance, ISFSI Fire Protection, Security Plans, and Emergency Plan.

1.4.8 Management may be comprised of on-site and off-site staff, and individuals may be responsible for more than one functional area. Although not required to be named as separate functional managers in the DQAP, implementing procedures shall clearly establish roles and responsibilities in the organization that include but are not limited to the following activities as they may apply to DQAP scope: Training, Final Status Survey (FSS), Procurement, Corrective Actions, Document Control and Records.

1.5 Delegation of Work

1.5.1 KS may delegate the execution of portions of the work under the DQAP to others such as contractors, agents, or consultants; however, KS retains overall responsibility for those activities and the DQAP. Delegation is clearly identified in documentation and KS retains the right to verify compliance with KS quality and regulatory requirements applicable to that organization's QA Program. QA program interactions, management responsibilities, and authority for the coordinated execution of the overall QA program, are established and documented.

1.6 Reporting

1.6.1 KS management is involved with QA matters on a continuing basis. Periodic reports summarizing the quality of KPS activities are reviewed and approved by the QAM. These reports contain status of the program adherence to the DQAP, issues identified, unresolved items, and/or other items of interest. These reports are submitted to the GM and other KS management as deemed appropriate.

1.6.2 The GM shall periodically have an Independent Management Assessment (IMA) performed to evaluate the effectiveness of the DQAP, as described in Appendix D of the DQAP.

2 QUALITY ASSURANCE PROGRAM

2.1 General

2.1.1 The QA Program for the Kewaunee Power Station (KPS), hereafter referred to as the program, is described in the DQAP. The program includes the DQAP and its implementing procedures, instructions, and drawings. The DQAP provides control over important to safety structures, systems and components (SSCs) and selected decommissioning related activities to an extent consistent with their importance to ensure safety and compliance as defined in procedures. The DQAP includes specific monitoring activities which are measured against acceptance criteria in a manner sufficient to provide KS management assurance that the important to safety activities are performed in an acceptable manner. The DQAP requirements apply to SSCs designated as important to safety identified in Appendix B of the DQAP.

2.1.2 The DQAP satisfies the requirements of 10 CFR 50 Appendix B; 10 CFR 71 Subpart H; and 10 CFR 72 Subpart G. Additional regulatory commitments are listed within Appendix C of the DQAP.

2.1.3 Implementation of the DQAP is controlled through separately issued implementing procedures, instructions, and drawings. Each organization is responsible for ensuring that the applicable portions of the DQAP are properly documented, approved, and implemented (with trained staff, necessary materials, and approved procedures available) before an activity within the scope of the DQAP is executed.

2.1.4 Important to safety activities shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanliness; and assurance that all prerequisites for the given activity have been satisfied. The program takes into account the need for special controls, processes, test equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection and test.

2.1.5 Changes to the DQAP will be implemented in accordance with 10 CFR 50.54(a) and 10 CFR 71.106.

2.1.6 Disputes arising between departments or organizations on QA matters that cannot be resolved at a lower level of management will be referred to the GM.

2.1.7 Additional requirements for specific programs are described in Appendix D, *Administrative Controls* of the DQAP.

2.2 Personnel Training and Qualifications

2.2.1 Individual managers are responsible for ensuring that personnel working under their cognizance are provided with the necessary indoctrination training and resources to accomplish assigned activities which fall under the scope of the DQAP.

2.2.2 Members of the KS staff (including audit and inspection personnel) shall have the appropriate qualifications necessary to perform their assigned duties defined in implementing procedures. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, Appendix D of the DQAP cites references that stipulate the use of specific industry standards addressing qualifications. Training programs are established and implemented to ensure that personnel achieve and maintain suitable proficiency. Personnel training and qualification records are maintained in accordance with approved procedures.

2.2.3 QA Lead Auditors are qualified and certified in accordance with approved procedures. Training methods, minimum experience requirements, and certification practices are in accordance with established procedures and based on criteria set forth in QA implementing procedures. Proficiency evaluations are performed and documented as defined in approved procedures.

2.3 Performance / Verification

2.3.1 Personnel performing work activities such as design, engineering, procurement, installation, maintenance, modification, operation and decommissioning are responsible for achieving acceptable quality.

2.3.2 Personnel performing independent verification activities are responsible for verifying the achievement of acceptable quality and are different personnel than those who performed the work.

2.3.3 Work is accomplished and verified using instructions, procedures, or other appropriate means that are of a detail commensurate with the activity's complexity and importance to safety.

2.3.4 Criteria that define acceptable quality are specified, and quality is verified against these criteria.

3 DESIGN CONTROL

3.1 General

3.1.1 The program will ensure that the activities associated with the design of important to safety SSCs and modifications thereto, are executed in a planned, controlled, and orderly manner.

3.1.2 The original design organizations for the important to safety SSCs are identified in Appendix B of the DQAP. Subsequent changes to the original design shall be made by the respective Design Authority in accordance with their NRC approved QA Program.

3.1.3 The program utilizes the guidance of NUREG/CR 6407, *Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety*, to classify SSCs such that appropriate quality requirements are identified and documented on drawings, component lists, or procurement documents, as applicable.

3.1.4 The program includes provisions to control design inputs, processes, outputs, changes, interfaces, records, and organizational interfaces.

3.1.5 Design inputs (e.g., performance, conditions of the facility license, design bases, regulatory requirements, quality standards identified in Appendix C of the DQAP, and quality verification requirements) shall be identified and correctly translated into design outputs (e.g., specifications, drawings, procedures, and instructions).

3.1.6 The final design output shall relate to the design input in sufficient detail to permit verification. Design outputs shall specify design characteristics that can be controlled, inspected, and tested. Inspection and test criteria are identified.

3.1.7 The design process shall ensure that materials, parts, equipment and processes are selected and independently verified consistent with their importance to safety to ensure they are suitable for their intended application.

3.1.8 Changes to final designs (including field changes and modifications) and dispositions of nonconforming items to either use-as-is or repair shall be subjected to design control measures commensurate with those applied to the original design and approved by the organization that performed the original design or a qualified designee.

3.1.9 Interface controls (internal and external between participating design organizations and across technical disciplines) for the purpose of developing, reviewing, approving, releasing, distributing, and revising design inputs and outputs shall be defined in procedures.

3.1.10 Errors and deficiencies in the design or the design process that could adversely affect SSCs important to safety shall be entered into the corrective action process.

3.1.11 Design documentation and records, which provide evidence that the design and design verification process was performed in accordance with the program, shall be collected, stored, and maintained in accordance with documented procedures. This documentation includes final design documents, such as drawings, specifications, and revisions thereto and documentation which identifies the important steps, including sources of design inputs that support the final design.

3.2 Design Verification

3.2.1 The program will verify the acceptability of design activities and documents for the design of items. The selection and incorporation of design inputs and processes, outputs and changes are verified.

3.2.2 Verification methods include, but are not limited to, design reviews, alternative calculations, and qualification testing. The extent of this verification will be a function of the importance to safety of the item, the complexity of the design, the degree of standardization, the state of the art, and the similarity with previously proven designs.

3.2.3 When a test program is used to verify the acceptability of a specific design feature, the test program will demonstrate acceptable performance under conditions that simulate the most adverse design conditions that are expected to be encountered.

3.2.4 Independent design verification is to be completed before design outputs are used by other organizations for design work and before they are used to support other activities such as procurement, manufacture, or construction. When this timing cannot be achieved, the unverified portion of the design is to be identified and controlled. In all cases, the design verification is to be completed before relying on the item to perform its important to safety function.

3.2.5 Individuals or groups responsible for design reviews or other verification activities shall be identified in procedures and their authority and responsibility shall be defined and controlled. Design verification shall be performed by any competent individuals or groups other than those who performed the original design, but who may be from the same organization. At least one individual shall have a level of skill at least equal to that of the original designer. The designer's immediate supervisor or manager may perform the design verification and controls for this are defined in approved procedures.

3.2.6 Design verification procedures are to be established and implemented to ensure that an appropriate verification method is used, the appropriate design parameters to be verified are chosen, the acceptance criteria is identified, the verification is satisfactorily accomplished and the results are properly recorded.

4 PROCUREMENT DOCUMENT CONTROL

4.1 The program will ensure that purchased items and services are of acceptable quality.

4.2 The program includes provisions for evaluating prospective suppliers and ensuring that selected suppliers continue to provide acceptable products and services.

4.3 The program includes provisions for taking corrective action with suppliers (qualified or otherwise) whose products and services are not considered acceptable.

4.4 The program includes provisions for source verification (inspection, audit, etc.) for accepting purchased items and services identified as important to safety when determined necessary.

4.5 The program includes provisions for invoking applicable technical, regulatory, administrative, and reporting requirements (e.g., specification, codes, standards, tests, inspections, special processes, records, certifications, 10 CFR 21) applicable to the procurement to be specified in procurements documents.

4.6 The program includes provisions that clearly delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of procurement documents.

4.6.1 Procurement documents shall be reviewed and approved by QA for the adequacy of quality requirements, and to ensure that the quality requirements are correctly stated, inspectable, and controllable; and to ensure there are adequate acceptance and rejection criteria.

4.6.2 Qualified personnel shall ensure the procurement document has been prepared, reviewed, and approved in accordance with program requirements.

4.6.3 Changes and revisions to procurement documents are subject to the same or equivalent review and approval as the original documents.

4.7 The program includes provisions for ensuring that documented evidence of an item's conformance to procurement requirements is available at the site before the item is placed in service or used unless otherwise specified in procedures. Procurement documents shall identify records to be retained, controlled, and maintained by the supplier and those records to be delivered to the purchaser before use or installation of the hardware.

4.8 The program includes provisions for ensuring that procurement, inspection, and test requirements have been satisfied before an item is placed in service or used unless otherwise specified in procedures.

4.9 The procurement of components, including spare and replacement parts, is subject to quality and technical requirements suitable for their intended service.

4.10 The program includes provisions for the identification of critical characteristics and methods of acceptance for the dedication of a commercial grade item or service for its use in an important to safety function(s).

5 INSTRUCTIONS, PROCEDURES AND DRAWINGS

5.1 The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings.

5.2 The program will ensure that the sequence of actions to be accomplished in the preparation, review, approval, and control of instructions, procedures, and drawings are clearly delineated. QA review and concurrence of instructions, procedures, drawings, and specifications related to inspection, tests, calibrations, and special processes shall be performed prior to implementation to verify adequate quantitative and qualitative criteria have been specified.

5.3 These instructions, procedures, and drawings include, as appropriate, quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished. Controls are established which ensure that instructions, procedures, and drawings are current and accurately reflect the facility design and regulatory requirements.

5.4 Changes or deviations from established instructions, procedures, or drawings for SSCs and other quality activities that have current important to safety functions, require the same review and approval as the original document. Instructions, procedures, and drawings, including changes and deviations subject to the DQAP, shall be maintained as required by administrative procedures.

5.5 Administrative controls may be established that provide the methods by which temporary changes can be made to procedures which are approved, including the designation of persons authorized to approve such changes.

6 DOCUMENT CONTROL

6.1 The program will control the development, review, approval, issue, use, and revision of documents, as applicable.

6.2 The program will ensure that the appropriate organizations review, approve, and issue documents and changes thereto before release to ensure that the documents are adequate and applicable quality requirements are stated.

6.3 The scope of the document control program includes, but is not limited to:

A. Safety Analysis Report(s);

B. NRC License Documents, including Technical Specifications;

C. Design Documents and Drawings;

D. Procurement Documents;

E. Procedures, Manuals, Plans, Directives, Policies, Instructions, etc., and;

F. Other documents as defined in procedures.

6.4 Revisions of controlled documents are reviewed for adequacy and approved for release by the same organization that originally reviewed and approved the documents or by a designated organization that is qualified and knowledgeable. Administrative controls ensure periodic reviews are performed for procedures that have specific regulatory review requirements.

6.5 Copies of controlled documents are distributed to and used by the person performing the activity.

6.6 The distribution of new and revised controlled documents is in accordance with procedures. Superseded documents are controlled to prevent inadvertent use.

7 CONTROL OF PURCHASED MATERIALS, EQUIPMENT AND SERVICES

7.1 Procedures shall describe each organization's responsibilities for the control of purchased material, equipment, and services including the interfaces between all affected organizations. Controls shall include the review and acceptance of supplier documents by the appropriate organization, including compliance to the technical and quality requirements specified in the procurement documents, as required.

7.2 The program will ensure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents as applicable to DQAP scope. The program includes provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery. The processes shall use a graded approach applying considerations of a material's, component's or service's importance to safety, complexity, and history of previous use.

7.2.1 Supplier evaluation and selection may be accomplished by direct audit of the supplier, in-process surveillance of the supplier's documented program, or by review of audit history performed by Energy*Solutions* or an approved third-party source. Verification that a supplier can meet the specified technical and quality requirements shall be documented. KS maintains an Approved Suppliers List (ASL) of evaluated suppliers.

A. External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not greater than three (3) years with a 90 day grace period.

B. For external audits of suppliers, an overall 25% extension (9 months) for triennial audits or surveys may be exercised during periods where performance of such activities is not feasible as a result of extenuating circumstances. Examples of extenuating circumstances would include, but are not limited to: 1) declaration of a national emergency; 2) severe localized or national weather conditions or damage to licensee or supplier infrastructure; or 3) localized outbreak of a severe health concern to the public and licensee. Continued use of suppliers that have exceeded the maximum allowed audit or survey time due to extenuating circumstances is allowed if the following conditions are met:

1. A documented evaluation must be performed to summarize why the audit or survey could not be performed prior to the end of the 90-day grace period and to provide the basis for maintaining the supplier as an approved supplier during the 25% (9-month) grace period. While implementing procedures must describe elements to be included in the documented evaluation, the following items should be considered as applicable:
   a. For 10 CFR 50 Appendix B, 10 CFR 71 Subpart H, and 10 CFR 72 Subpart G suppliers, verification that the supplier's quality assurance program is still committed to meeting the requirements of 10 CFR 50 Appendix B, 10 CFR 71 Subpart H, and 10 CFR 72 Subpart G, respectively.
   b. For commercial suppliers who are approved based on commercial grade survey, verification the supplier has maintained adequate documented programmatic controls in place for the activities affecting the critical characteristics of the item/services being procured.
   c. Evaluation of any significant open issues with the NRC, 10 CFR Part 21 Notifications, and any open findings since the previous triennial audits describing impact on the items/services being procured from that supplier.
   d. Review of procurement history since last triennial audit/survey including receipt inspection results to identify any potential issues. The results of the performance history must be included in the evaluation.
   e. The degree of standardization of the items being procured. For instance, suppliers of catalog items which are used across multiple industry with widely accepted good performance histories would be considered good candidates for a 25% (9-month) grace period.
2. If concerns are identified based on the above evaluation, the following mitigating actions may be considered:
   a. Enhanced receiving inspections beyond visual inspections and quality checks.
   b. Identification of any additional requirements/restrictions to be placed on the supplier.
3. For audits/surveys performed during the 25% grace period, the audit/survey shall include a review of activities performed by the supplier since the 36-month audit/survey expiration date.
4. The allowance would only apply to existing suppliers on the Approved Supplier's List.
5. The 25% grace period discussed above is applicable to domestic and international suppliers.
6. For audits/surveys performed during the 25% grace period, the audit/survey "clock" does not have to reset backwards to the original expiration date for which the audit/survey should have been performed. The end of the audit or survey would determine the date of the next triennial audit/survey.

C. KS considers that other 10 CFR 50 licensees, Authorized Nuclear Inspection Agencies, National Institute of Standards and Technology (NIST), or other State and Federal agencies which may provide items or services to the KPS facilities are not required to be evaluated or audited.

D. Suppliers of commercial grade calibration and testing services may be qualified based on their accreditation by a nationally - recognized accrediting body in accordance with the provisions of the Nuclear Energy Institute (NEI) 14-05 guidelines, provided the conditions of the associated NRC Safety Evaluation are met.

7.2.2 Source verification may be performed at the contractor or subcontractor source via planned surveillance or in-process inspection and documented when it is determined advantageous to monitor or observe an item or activity to verify conformance.

7.2.3 For acquiring of services only, such as third-party inspection, engineering and consulting services, in cases where the suppliers QA Program has not been reviewed or accepted by KS, those suppliers may be used provided additional controls such as technical verification of data produced, surveillance and/or audit of the activity, or review of objective evidence are employed. These additional controls shall be documented.

7.2.4 Receiving inspection shall verify, by review of objective evidence, the material and equipment conform to the procurement documents, including applicable technical and quality requirements.

7.2.5 Effectiveness of the control of quality by contractors and subcontractors will be assessed at intervals consistent with the importance, complexity, quantity of the product or services, and performance history. Supplier performance and compliance with procurement documents are monitored by audit, source verification, receipt inspection, or a combination to ensure continued acceptable supplier performance.

7.4 Documentary evidence that material and equipment conform to the procurement requirements shall be available before installation and use, and items accepted and released should be identified as to their inspection status. The documentary evidence shall be retained in accordance with applicable regulatory requirements and shall be sufficient to identify the specific requirements, such as codes, standards, or specifications, met by the purchased material and equipment.

7.5 General administrative controls for conduct of audit, surveillance, in-process inspection, receipt inspection are provided for in Sections 10 and 18 of the DQAP.

8 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS

8.1 The program will identify and control important to safety items to prevent the use of incorrect or defective items.

8.2 The program will ensure replacement of installed limited-life items before their expiration, and will ensure items with a specified shelf-life in inventory are prevented from use beyond their expiration.

8.3 Identification of each item is maintained by heat number, part number, serial number, or other appropriate means, either on the item or on records traceable to the item, as required throughout fabrication , erection, installation, and use so that the item can be traced to its documentation. Traceability is maintained to an extent consistent with the item's importance to safety. The location and method of identification shall not affect the fit, function, or quality of the item being identified.

9 CONTROL OF SPECIAL PROCESSES

9.1 This program will ensure that special processes identified as important to safety are properly controlled. The criteria that establish which processes are special are described in procedures. The following are examples of special processes:

A. Welding;

B. Heat treating;

C. NDE (Non-Destructive Examination);

D. Chemical cleaning; and

E. Unique fabricating or test processes which require in-process controls.

9.2 Special processes are accomplished by qualified personnel, using appropriate equipment, and procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

10 INSPECTION

10.1 The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with instructions, procedures, and drawings for accomplishing the activity.

10.2 Provisions to ensure inspection planning is properly accomplished are to be established. Planning activities shall identify the characteristics and activities to be inspected, the inspection techniques, the acceptance criteria, and the organization responsible for performing the inspections. When sampling is used to verify acceptability of a group of items, the standard used as the basis for acceptance shall also be specified.

10.3 Provisions to identify inspection hold points, beyond which work is not to proceed without the consent of the inspection organizations are to be defined. Provisions shall be made for indirect control by monitoring processing methods, equipment, and personnel if direct inspection is not possible. Both inspection and process monitoring shall be provided when control is inadequate without both.

10.4 Inspection results are to be documented by the inspector and reviewed by qualified personnel. Inspection records shall include the following, as a minimum:

10.4.1 Item inspected;

10.4.2 Date of inspection;

10.4.3 Inspector;

10.4.4 Type of observation;

10.4.5 Results or acceptability; and

10.4.6 Description of nonconforming conditions, or reference to applicable nonconformance or corrective action documents in cases where acceptance criteria was not met.

10.5 Unacceptable inspection results shall be evaluated and resolved in accordance with procedures.

10.6 Inspections are performed by qualified personnel other than those who performed or directly supervised the work inspected. While performing the inspection activity, inspectors functionally report to the QAM. QA surveillance will be conducted periodically to confirm sufficient independence from the individuals who performed the activities for inspections performed by groups other than QA.

11 TEST CONTROL

11.1 The program will demonstrate that items will perform satisfactorily in service using approved test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

11.2 The program includes, as appropriate, proof tests before installation, pre-operational tests, post-maintenance tests, post-modification tests, and operational tests.

11.3 Test procedures shall be developed which include:

A. Instructions and prerequisites to perform the test;

B. Use of proper test equipment;

C. Acceptance and rejection criteria;

D. Mandatory inspections, as required; and

E. Methods of documenting or recording test data results.

11.4 When practicable, the measures should ensure testing of the SSC occurs under conditions that will be present during normal and anticipated off-normal operations.

11.5 Test results are evaluated and documented by qualified personnel to assure that test objectives and inspection requirements have been satisfied.

11.6 Unacceptable test results shall be evaluated and documented for impact on safety and reportability.

12 CONTROL OF MEASURING AND TEST EQUIPMENT

12.1 The program consisting of implementing procedures reviewed and approved by the appropriate organizations will control the calibration, maintenance, and use of measuring and test equipment (M&TE) consistent with activities importance to safety to ensure accuracy.

12.2 Calibration reference standards shall be based on traceability to nationally recognized standards. Where national standards do not exist, measuring and test equipment is calibrated against standards that have an accuracy of at least four (4) times the required accuracy of the equipment being calibrated, or when this is not possible have an accuracy that ensures the equipment being calibrated will be within the required tolerance. Special calibration and control measures are not required when normal commercial practices provide adequate accuracy (e.g., rulers, tape measures, levels, and other such devices).

12.3 The types of equipment covered by the program (e.g., instruments, tools, gauges, and reference and transfer standards) and measures to document and maintain the status of all calibrated M&TE are defined in procedures.

12.4 Measuring and test equipment is calibrated at specified intervals or immediately before use on the basis of the item's required accuracy, required calibration technique, intended use, frequency of use, stability characteristics, and other conditions affecting its performance.

12.5 Measuring and test equipment is labeled, tagged, or otherwise controlled to indicate its calibration status and traceability to calibration test data.

12.6 Measuring and test equipment found damaged or out of calibration is tagged or segregated. The acceptability of items measured, inspected, or tested with a damaged or out-of-calibration device, shall be evaluated, dispositioned and documented.

13 HANDLING, STORAGE AND SHIPPING

13.1 General

13.1.1 The program will control the handling, storage, shipping, cleaning, and preserving of items to prevent damage or deterioration.

13.1.2 Special protective measures (e.g., containers, shock absorbers, accelerometers, inert gas atmospheres, specific moisture content levels, and temperature levels, etc.) are specified and provided when required to prevent damage or deterioration.

13.1.3 Specific procedures shall be developed and used for cleaning, handling, storage, packaging, shipping, and preserving items when required to prevent damage or deterioration.

13.1.4 Items are marked and labeled during packaging, shipping, handling, and storage to identify, maintain, and preserve the item's integrity and identify the need for any special controls.

13.2 USNRC-Licensed Packages

13.2.1 KS shall meet the requirements of 10 CFR 71 Subpart H and 10 CFR 72 Subpart G and Department of Transportation (DOT) 49 CFR for restrictions concerning handling, storage, and shipping of NRC Licensed packages, except as may be allowed by NRC and/or DOT exemptions granted for specialty packages.

13.2.2 Transportation cask handling and operation shall conform to the handling and operating procedure for each licensed cask.

13.2.3 Prior to the shipment of a transport cask, conditions of the NRC's Certificate of Compliance (specifications, tests, and inspections) shall be satisfied. Required shipping papers shall be prepared and shall accompany the shipment in accordance with regulatory requirements and approved procedures.

13.2.4 Established safety restrictions concerning handling, storage, and shipping shall be included in the handling and operating procedures for storage and transport casks.

14 INSPECTION, TEST, AND OPERATING STATUS

14.1 The program will ensure that required inspections and tests and the operating status of items important to safety is verified before release, fabrication, receipt, installation, test, and use, as applicable. This verification is to preclude inadvertent bypassing of inspections and tests and to prevent inadvertent operation of controlled equipment. Operating status is provided by the use of tags, markings, stamps, or other suitable means.

14.2 Items whose required inspections and tests are incomplete or inconclusive may be released for further processing. Controls are provided in procedures for establishing limitations on the release, applying status indications, and documenting the basis for the conditional release of the item and any limitations.

14.3 The application and removal of inspection, test, and operating status indicators are controlled in accordance with procedures.

15 NONCONFORMING MATERIALS, PARTS OR COMPONENTS

15.1 The program will ensure that nonconforming important to safety materials, parts, components, associated services and activities are identified and controlled.

15.2 Nonconforming items are properly controlled by approved procedures describing the identification, documentation, segregation requirements, disposition and approval authority, and notification to the affected organizations to prevent their inadvertent installation or use. Nonconforming items are reviewed and either accepted, rejected, repaired, or reworked in accordance with approved procedures.

15.3 Management at all levels and each individual working at the facility is responsible for promptly identifying and reporting the identification of nonconforming materials, parts, and components.

15.4 Interfaces with the Corrective Action Program described in Section 16 of the DQAP will be established to ensure the prompt identification, documentation, and correction of nonconforming materials, parts, and components installed in SSCs.

15.5 Verification of the acceptability of reworked or repaired materials, parts, and SSCs is by re-inspecting and retesting the item as originally inspected and tested, or by using a method that is at least equal to the original inspection and testing method.

15.6 Supplier nonconformance reports designated accept as is or repair for important to safety SSCs require KS review and approval.

15.7 Nonconformance reports will be periodically evaluated for trends, provided sufficient quantity of data exists. Adverse trends will be entered into the Corrective Action Program.

16 CORRECTIVE ACTION

16.1 Each individual working at the facility is responsible for promptly identifying and reporting conditions adverse to quality. Management at all levels encourages the identification of conditions that are adverse to quality.

16.2 The program will ensure that conditions adverse to quality (such as nonconformance, failures, malfunctions, deficiencies, deviations, and defective material and equipment) are evaluated in accordance with established procedures to assess the need for corrective action to address the condition identified, and to preclude recurrence of the condition. Follow-up activities to verify proper implementation of corrective actions and close out of the corrective action documentation in a timely manner shall be performed in accordance with established procedures.

16.3 The QA organization will be included in the concurrence chain regarding the adequacy of the corrective action, and in the follow-up action to verify the proper implementation of corrective action, in accordance with approved implementing procedures.

16.4 Significant conditions adverse to quality shall require cause determination, corrective actions that should prevent recurrence, documentation and reporting to appropriate levels of management. Follow-up action shall be taken to verify effective implementation of the required corrective actions to prevent recurrence and to verify that they are effectively implemented.

16.5 In the case of contractors, agents, or consultants performing activities within the scope of the program, the applicable manager may delegate specific responsibilities for corrective actions, but maintains responsibility for the effectiveness of corrective action measures.

16.6 Reports of conditions that are adverse to quality are analyzed to identify negative performance trends. Significant conditions adverse to quality and significant trends are reported to the appropriate levels of management.

17 QUALITY ASSURANCE RECORDS

17.1 The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents. Records shall be identified and retrievable.

17.2 Controls for the administration, identification, receipt, storage, preservation, safekeeping, retrieval, and disposition of records are provided in procedures. Responsibilities for QA and other organizations for the identification of QA and other required records, and for implementation of activities related to the records, are provided in procedures.

17.2.1 Facilities used to store records should be constructed to minimize the risk from damage or destruction by severe natural conditions, such as wind, flood, fire, temperature, humidity, mold, or infestation by insects or rodents.

17.2.2 If dual storage facilities are used to ensure the record integrity, the storage facilities should be sufficiently remote from each other to preclude a single event (such as a fire or flood) from damaging both facilities.

17.3 Management of the electronic storage of records will utilize the guidance provided in the following industry standards as described in approved procedures:

17.3.1 NIRMA TG11-2011, *Authentication of Records and Media*

17.3.2 NIRMA TG15-2011, *Management of Electronic Records*

17.3.3 NIRMA TG16-2017, *Software Quality Assurance Documentation and Records*

17.3.4 NIRMA TG21-2011, *Required Records Protection, Disaster Recovery and Business Continuation*

17.4 In an approval dated May 10, 2017 [ML17069A394], DEK was granted exemptions by the NRC to allow elimination of the requirement to maintain records that are no longer necessary due to the permanently defueled condition and decommissioning status of the KPS. The NRC granted DEK a partial exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50 Appendix B, Criterion XVII; and 10 CFR 50.59(d)(3) for the KPS to advance the schedule to remove records associated with structures, systems, and components (SSCs) that have been or will be removed from NRC licensing basis documents by appropriate change mechanisms.

17.5 Records generated for SSCs that were once classified as safety-related or quality-related but no longer have a safety function do not need to be retained for purposes of the DQAP (but may need to be retained for other purposes, such as compliance with 10 CFR 50.75(g), other regulations, or for business reasons).

18 AUDITS

18.1 The program will establish a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of DQAP scope activities. QA internal and supplier audits are planned and performed by qualified auditors utilizing approved written procedures and/or checklists. External audits by licensees/utilities, Contractors, or Consultants acting for KS to satisfy KS audit requirements shall have the results evaluated by KS to ensure acceptability.

18.2 Lead Auditors shall have experience, training or qualifications commensurate with the scope and complexity of their audit responsibility. Individuals performing audits shall not have direct responsibilities in the areas being audited.

18.3 Scheduling, preparation, personnel selection, performance, reporting, response, follow-up, and records management for audits are performed in accordance with written procedures. Audit scopes and schedules are based upon the status of work progress, important to safety activities being performed, and regulatory requirements.

18.4 Planned internal audits are scheduled and performed in accordance with approved procedures or checklists to provide comprehensive, independent verification, and evaluation of DQAP compliance, performance criteria, and program effectiveness. Important to Safety (10 CFR 71 and 72) activities shall be audited based on the activity's importance to safety; however, each applicable quality criterion shall be audited at least once each year. Audit of DQAP elements applicable to other activities conducted under the DQAP shall be completed for each functional area at least once every two years.

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

A. Audits shall be performed at the intervals designated and the schedules are based on the month in which the audit starts.

B. A maximum extension not to exceed 25 percent of the audit interval is allowed unless restricted by regulation.

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

18.5 When specific audits are identified as requiring a more frequent periodicity, the shortest periodicity will be adhered to for activities covered by those specific regulatory requirements. The frequency of internal audits will be prescribed by the site implementing procedures which govern the conduct of QA audits.

18.6 Surveillances may be performed and documented when it is determined advantageous to monitor or observe an item or activity to verify conformance. Surveillance should be documented in sufficient detail to identify the activity covered, identify individuals doing surveillance, and to document results and corrective measures necessary. Surveillance conducted by or under the direction of a Lead Auditor may be integrated into and credited toward required audit activities.

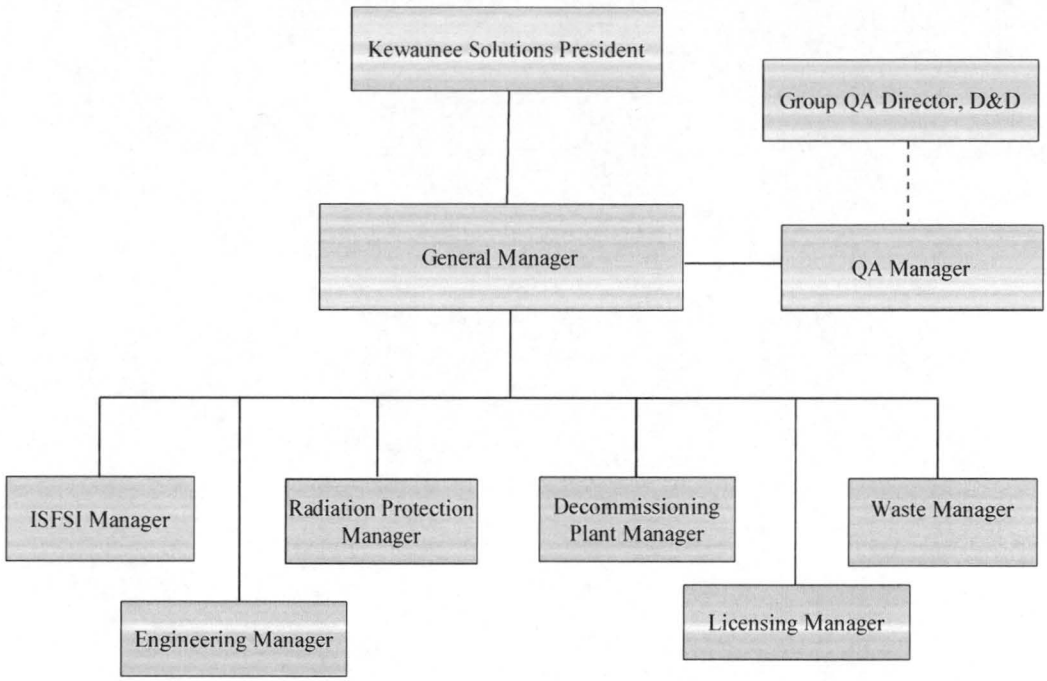
18.7 Audit reports shall be prepared, reviewed, approved, and distributed in accordance with approved procedures.

18.8 Results of audits are reviewed with the management of the organization audited. Responsible management in the areas audited shall implement the necessary corrective actions required to address deficiencies. These actions are documented and reviewed periodically and, if needed, re-examined during re-audits of the subject area to verify deficient areas have completed corrective actions.

18.9 Audit records shall be retained in accordance with approved implementing procedures.

Appendix A

Kewaunee Solutions (KS) Organization Chart



Notes:

1. Functional Organization Chart using Generic Titles. Alignment with actual titles maintained current in approved company documents.
2. All positions are not defined and ultimate reporting is to the Kewaunee Solutions President.
3. Lines of authority, responsibility and communication shall be established between the organization depicted above and any offsite organizational elements that function under the cognizance of the DQAP.

Appendix B

Important to Safety (ITS) Structures, Systems and Components (SSCs)

Section 1 – General

1.1 The pertinent quality assurance requirements of the DQAP will be applied, as a minimum, to all quality activities affecting the ITS SSCs as defined by 10 CFR 71 and 10 CFR 72 that are associated with spent fuel storage and transportation packages.

1.2 The safety classification of SSCs of the Plant and ISFSI Facility may be revised during decommissioning based on engineering evaluations and revision to the KPS Defueled Safety Analysis Report (DSAR). These modifications are controlled in accordance with the KS Design Control process, including implementation of §50.59 and §72.48 requirements, as applicable. These modifications are not considered a reduction in the commitments to the DQAP.

1.3 The safety classification of NRC Licensed ISFSI Dry Fuel Storage Components and Transportation Packages may not be revised using the KS Design Control process. These modifications must be made by the NRC Certificate Holder. The Certificate Holder is responsible for design and licensing controls for these components under their NRC approved Quality Assurance Program. KS utilizes these types of components and packages under the provisions of NRC General License for Radioactive Material Transportation Packages (10 CFR 71) and Spent Fuel Storage (10 CFR 72).

1.4 The storage of GTCC Waste Containers at the ISFSI in regard to 10 CFR 72 is addressed in NUREG-2215, *Standard Review Plan for Spent Fuel Dry Storage Systems and Facilities* (April, 2020).

1.5 For the definition of Quality Categories A, B, and C refer to NUREG/CR-6407.

1.6 Important-to-Safety SSCs associated with spent fuel storage and radioactive material transportation packages are identified below:

A. Dry Spent Fuel Storage (10 CFR 72)

SSC	Quality Category	Design Authority
Stainless Steel Fuel Storage Canister(s) and Internals	Note 1	Note 2
Concrete Cask Overpack(s)	Note 1	Note 2
ISFSI Pad(s)	ITS-C	KS

B. Transport of Spent Fuel and GTCC Waste (10 CFR 71)

SSC	Quality Category	Design Authority
Stainless Steel Fuel Storage Canister(s) and Internals	Note 1	Note 2
Stainless Steel GTCC Waste Container(s) and Basket(s)	Note 1	Note 2
Licensed Transport Cask(s)	Note 1	Note 2

C. Radioactive Material Transport Packages (10 CFR 71)

Radioactive Material Transport Packages subject to the provisions of 10 CFR 71 Subpart C, *General Licenses* are Important-to-Safety and subject to the applicable requirements of the DQAP.

Notes:

1. See the applicable Certificate Holder's Final Safety Analysis Report (FSAR) and associated specifications for detailed quality category information (Transnuclear / Orano for NUHOMS system and NAC for NAC MAGNASTOR system).
2. Design Authority is Transnuclear / Orano for NUHOMS system, and NAC for NAC MAGNASTOR system.

Appendix C

Regulatory Requirements and Commitments

Section 1 -Regulatory Requirements:

1.1 10 CFR 50, Appendix B, *Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants*

1.2 10 CFR 71, *Packaging and Transportation of Radioactive Material*, Subpart H, *Quality Assurance*

1.3 10 CFR 72, *Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste*, Subpart G, *Quality Assurance*

Section 2 - Regulatory Commitments:

Note: KPS has previously loaded NUHOMS and MAGNASTOR Dry Cask Storage Systems (DCSSs) in use at the ISFSI, and use of additional DCSS systems are planned for GTCC in the future. The DCSS C of C holder QA Programs used for these DCSS systems may be committed to earlier revisions of Regulatory Guide 7.10.

2.1 Regulatory Guide 7.10, *Establishing Quality Assurance Programs for Packaging Used in the Transport of Radioactive Material* (Revision 3 - see Note above).

2.2 NUREG/CR-6407, *Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance* to *Safety (2/96).*

Note: The following is implemented through Management Controls (Ref. Appendix D of the DQAP).

2.3 Regulatory Guide 4.15, *Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment (Revision 1 – February, 1979)*

Section 3 - Alternatives:

3.1 Suppliers providing commercial grade calibration and testing services, who are accredited by a nationally recognized accrediting body, as described in Nuclear Energy Institute (NEI) 14-05 guidelines, may be used without additional qualification, provided the conditions of the associated NRC Safety Evaluation are met. Controls shall be established in applicable procedures to ensure the requirements of the NRC Safety Evaluation are satisfied prior to acceptance.

Appendix D

Administrative Controls

A. INDEPENDENT REVIEWS

1.0 Independent Management Assessment (IMA)

The GM shall periodically have an IMA performed to evaluate the effectiveness of the KS QA Program as detailed in approved administrative procedures. These IMAs are performed by individual(s) designated by the GM who are independent of KS oversight activities and who have the appropriate level of expertise in the activities assessed. These periodic IMAs shall be performed on a 24-month frequency with a 90-day grace period, which is not to impact the established 24-month cycle for the assessment. The IMA results are communicated via a written report in a timely manner to a level of management having the authority to execute effective corrective action. In addition, these results are reported to the KS management team through the GM.

2.0 Independent Safety Review (ISR)

Independent Safety Reviewers perform ISRs of proposed changes, tests and experiments to important to safety SSCs, activities, program documents, and procedures that are subject to the DQAP requirements as detailed in approved administrative procedures. Independent Safety Reviewers shall be individuals without direct responsibility for the performance of activities under review, and shall be competent and knowledgeable in the subject area being reviewed. Independent Safety Reviewers shall have at least 5 years of professional experience and either a Bachelor's Degree in Engineering or the Physical Sciences or shall have equivalent qualifications in accordance with ANSI N18.1·1971. Independent Safety Reviews must be completed prior to implementation of proposed activities. The manager responsible for the overall operational activities (or designee) shall document the appointment of Independent Safety Reviewers as defined in procedures.

B. SCOPE SUBJECT TO MANAGEMENT CONTROLS IN LIEU OF DQAP CONTROLS

3.0 Facility Staff Qualifications

3.1 Facility staff responsible for the safe storage of nuclear fuel and selected decommissioning activities shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as defined in approved procedures except for: a) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

4.0 Procedures, Programs and Manuals

4.1 Procedures

Note: The section below was previously moved from the KPS Technical Specifications to the Dominion Energy Nuclear Quality Assurance Program Description (QAPD).

4.1.1 Written procedures shall be established, implemented, and maintained covering the following activities:

A. Quality assurance for effluent and environmental monitoring (Regulatory Guide 4.15, Revision 1, Ref. Appendix C of the DQAP);

B. Fire Protection Program implementation;

C. Radioactive Effluent Controls Program; and

Note: The intention of including the next requirement is to ensure that, in the event radioactive storage tanks are brought online, then the requirement for procedures would apply. It is not intended to require that standing procedures are required in the absence of radioactive storage tanks.

D. Storage Tank Radioactivity Monitoring Program

ATTACHMENT 2

50.54(a) EVALUATION

44 PAGES

KEWAUNEE POWER STATION

Attachment 2, 10 CFR 50.54(a) / 10 CFR 71.106 Evaluation

Background

This 10 CFR 50.54(a) Evaluation is for use in responding to the NRC "Dominion Energy Kewaunee, Inc. - Request for Additional Information Regarding EnergySolutions, LLC Submittal for Approval of Decommissioning Quality Assurance Program," (EPID L-2021-DP3-0000), dated 2/2/22.

The Evaluation consists of the following:

- **Evaluation Section I: Overall Summary**
- **Evaluation Section II: 10 CFR 50.54/10 CFR 71.106 Evaluation Section**

  Note: The format in this Section is based on Energy*Solutions* Procedure DDG-QA-PN-001, "QA Program Implementation Plan for D&D Projects," Attachment 5.2, "QAPP Revision Process", Rev. 6
- **Evaluation Section III: Detailed Comparison and Evaluation**

This Evaluation compares the following (2) QA Programs:

- Topical Report DOM-QA-1, "Dominion Energy Nuclear Facility Quality Assurance Program Description," Rev. 30 [referred to as the QATR in the Evaluation]
- KS-QA-PG-001, "Kewaunee Solutions Decommissioning Quality Assurance Program (DQAP)," Rev. 1 [referred to as the DQAP in the Evaluation]

Evaluation Section I: Overall Summary

[See Evaluation Section III, for details in context of the Evaluation.]

Changes that are not a reduction in commitment per 10 CFR 50.54(a)(3):

1) Since the QATR is a fleet QA program, and Kewaunee Power Station (KPS) was the one unit in the fleet that was no longer commercially operational, the QATR exempts KPS from specific QATR requirements applicable to only the operating units. These types of differences between the QATR and the DQAP resulted in a conclusion that changes of this type are not a reduction in commitment as described in this Evaluation.

2) Since the QATR is a fleet QA program reflecting the Dominion organization and administrative practices, and the DQAP is focused on Kewaunee Power Station (KPS) only, reflecting the Energy*Solutions* / Kewaunee Solutions organization and administrative practices. There are administrative differences between the two documents based on differing titles, terminology and business practices not necessarily related to the QA program. In this Evaluation, where these differences did not differ in intent, and did not compromise the necessary independence of the organizations performing quality assurance functions, they resulted in a conclusion that changes of this type are not a reduction in commitment as described in this Evaluation.

3) The DQAP contains an increased grace period for external audits in comparison to the QATR. The increased grace period is specific to extenuating circumstances that was approved by the NRC with a Safety Evaluation Report (SER) in response to a request from Callaway Station (Ref. NRC SER dated August 6, 2020, ADAMS Accession No. ML20216A681). Therefore, this resulted in a conclusion that this change was not a reduction in commitment as described in this Evaluation.

4) The QATR includes detail regarding electronic record controls that duplicates language in the Nuclear Information and Records Management Association (NIRMA) standards committed to in the DQAP by reference. This resulted in a conclusion that changes of this type are not a reduction in commitment as described in this Evaluation.

5) With respect to the DQAP committing to more recent NIRMA standards than the QATR, this change is not a reduction in commitment as described in this Evaluation.

Changes that are a reduction in commitment per 10 CFR 50.54(a)(4):

The Evaluation determined the following changes to be reductions in commitment that require NRC approval prior to implementation:

QATR "Introduction" Section:

1) The quality assurance and administrative measures established in the DQAP are not comparable to those implemented during construction and operation of KPS. They are applicable to decommissioning activities only.

This change is aligned with the status of KPS in the decommissioning stage, with no plant Structures, Systems and Components (SSCs) classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the Independent Spent Fuel Storage Installation (ISFSI). It is no longer necessary to apply the level of control commensurate with construction and operational activities to the KPS nonsafety-related SSCs regulated under 10 CFR 50. The DQAP does apply the appropriate level of controls to the SSCs that are Important to Safety (ITS) under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by the NUREG 1536 and NUREG 1757 compliance matrices included in the Request for Additional Information (RAI) response. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Basis" Section: [Note that this 10 CFR 50.54(a)(4) analysis applies to multiple QATR Sections – Refer to Evaluation Section III for specific details]

2) In the aggregate, the QATR includes substantially more commitments to regulatory bases than the DQAP.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. The regulatory commitments in the QATR that are not referenced in the DQAP are intended to apply a level of control that is no longer required for the KPS nonsafety-related SSCs regulated under 10 CFR 50. The DQAP does apply the appropriate regulatory and quality standards to the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Subsection 1.2: Responsibility and Authority": [Note that this 10 CFR 50.54(a)(4) analysis applies to multiple QATR Sections – Refer to Evaluation Section III for specific details]

3) The Facility Safety Review Group (FSRG) function in the QATR is replaced by the Independent Safety Review (ISR) function in the DQAP.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. The FSRG is a deliberative review body, and the ISR is one or more technically qualified independent individuals competent and knowledgeable in the subject area being reviewed. It is no longer necessary to apply the more complex FSRG administrative process that is suited for operating plants to review changes associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50 specific to a facility in decommissioning. The ISR function described in the DQAP does apply comparable controls to review like changes to the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

4) The QATR includes specific mention of an Information Technology (IT) services management function, and the DQAP does not.

Section 1.2 of the QATR ascribes responsibilities to the IT position, of which several are not directly related to quality measures described in the QATR. For the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI, the only potential area cited in the QATR applicable to KPS quality activities is development and maintenance of the software control program. For KPS, software controls associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72 are to be developed and maintained by the Design Authority under their respective NRC approved QA programs, and are subject to oversight by KS as described in Section 7 of the DQAP. It is also recognized that IT services are a necessary support function to numerous areas of responsibility listed in DQAP Section 1.4. Notably in the case of document control/records management, DQAP Section 17 makes specific reference to the NIRMA standards. The IT management functions are integral to implementation of these standards, the details of which are included in Energy*Solutions* implementing procedures. The DQAP changes, combined with the

implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Subsection 2.2: Applicability":

5) The QATR states that numerous program documents further describe application of portions of the QA program, and the DQAP does not. The documents listed in the QATR are the Safety Analysis Report (SAR), nuclear design control program, physical security plan, emergency plan, radiological protection plan including radioactive material transport and radioactive waste processing, fire protection plan and nuclear chemistry laboratory quality assurance program.

6) The DQAP does not include a Risk Informed Categorization description and specific controls to be applied to nonsafety-related SSCs analogous to QATR, Appendix F.

These changes are commensurate with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. Although the DQAP does not make a statement comparable to the one in the QATR, the DQAP emphasizes that implementing procedures and program documents are required to include sufficient level of detail to meet applicable regulatory requirements. This will ensure that the applicability of the DQAP and the appropriate portions of the DQAP as they relate to implementing procedures and program documents will be clearly described. It is no longer necessary to apply the classification system represented by the Risk Informed Categorization, and pre-established minimum QA requirements, to nonsafety-related SSCs regulated under 10 CFR 50. DQAP Section D requires the continued application of formal administrative controls to those SSCs that warrant augmented quality requirements during all phases of decommissioning. KS will maintain other regulatory programs (e.g., physical security plan, emergency plan, radiological protection plan, radioactive material transport not addressed in 10 CFR 71, and radioactive waste processing) that establish measures to ensure KS decommissioning activities are conducted in accordance with the applicable regulatory requirements, with a focus on safety, quality and compliance. The absence of detail in the DQAP for these program areas does not diminish KS commitment or responsibility for compliance. Additionally, it is no longer necessary to apply the classification system represented by the Risk Informed Categorization, and pre-established minimum QA requirements, to nonsafety-related SSCs regulated under 10 CFR 50. DQAP Section D requires the continued application of administrative controls to those SSCs that warrant augmented quality requirements during decommissioning. The DQAP does apply the appropriate level of controls in the administrative processes associated with decommissioning and SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Subsection 2.3: Oversight of the Quality Program Implementation":

7) The QATR Management Safety Review Committee (MSRC) was replaced with the Independent Management Assessment (IMA) in the DQAP.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. The MSRC is a deliberative review body, and the IMA is one or more technically qualified independent individuals competent and knowledgeable in the subject area(s) being reviewed. It is no longer necessary to apply the composition of the MSRC to evaluate the KS QA program implementation and

effectiveness associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50. The IMA is a comparable administrative process to evaluate the effectiveness of the KS QA program as it applies to decommissioning under 10 CFR 50, and for assessment of activities associated with the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Subsection 2.5: Selection, Training, and Qualification of Personnel":

8) The QATR cites 10 CFR 50.120 and the DQAP does not.

9) The detailed content of the QATR for training and qualifications for staff positions was replaced with DQAP Appendix D, Section B, 3.1.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply the level of control of the 10 CFR 50.120 Systems Approach to Training (SAT) process to staff qualifications associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50, nor is it necessary to provide detailed descriptions of the qualification requirements for plant staff positions in the QA program. KS will maintain required regulatory programs (e.g., Radiation Protection, Radioactive Waste, Final Status Survey, Security) that establish measures to require, conduct and control training/qualifications to ensure KS decommissioning activities are executed in accordance with the applicable regulatory requirements through the sets of implementing procedures. The DQAP Section 2 training requirements provide an appropriate level of controls for the training requirements for decommissioning and ISFSI/Operations staff performing activities under the scope of the DQAP, including any specific training required by the License. The DQAP Appendix D Section B, 3.1 requirement is an appropriate administrative process for establishing qualification requirements for staff conducting decommissioning activities conducted under 10 CFR 50, and for establishing qualification requirements associated with the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Section 3, Design Control":

10) The QATR includes controls for software and the DQAP does not.

This change is aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply the level of control to software associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50. With respect to software controls associated with SSCs that are Important to Safety (ITS) under 10 CFR 71 and 10 CFR 72, DQAP Appendix B states that any design changes (that would employ software as part of the design process) to ITS SSCs would be made by the specific Design Authority, including Energy*Solutions*, under their QA Program, not the DQAP. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Section 7, Control of Purchased Material, Equipment, and Services":

11) The QATR includes some relevant detail related to selection of suppliers, measures for acceptance and quality verifications, and reference to NRC correspondence that is not included in the DQAP.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply the level of detail to suppliers associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50. With respect to suppliers associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, these suppliers are identified in DQAP Appendix B, with the exception of the supplier which will be providing the GTCC transportation packages in the future. In this case, the potential list of suppliers is limited to those suppliers with NRC approved QA programs, that hold an NRC issued Certificate of Compliance (CoC) for the GTCC transportation package. The DQAP does apply the appropriate thoroughness for the control of purchased items and services for the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Section 11, Test Control":

12) The QATR includes some relevant detail related to preoperational testing, startup testing, and scheduling that is not included in the DQAP.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply an operational plant level of control to tests associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50. With respect to tests associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, the DQAP does apply the appropriate controls to testing the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Section 14, Inspection, Test, and Operating Status":

13) The QATR includes some relevant detail related to the authority for implementing controls, temporary controls, independent verifications, and operational considerations particular to SSCs at an operating reactor that is not included in the DQAP.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply an operational plant level of detail related to authority for implementing controls, temporary controls, independent verifications, and operational considerations to the KPS nonsafety-related SSCs regulated under 10 CFR 50 and associated with a plant in decommissioning as compared to the operational considerations described in the QATR. With respect to these types of controls associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, the DQAP does apply the appropriate controls for the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10

CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Section 17, Quality Assurance Records / Appendix E":

14) The QATR includes detail related to records indexing (including the Appendix E) that is not included in the DQAP.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply operational plant level of indexing and control to records associated with the nonsafety-related SSCs regulated under 10 CFR 50 and associated with a plant in decommissioning as compared to the operational requirements described in the QATR. With respect to the removal of records indexing detail from the DQAP, whether from the 10 CFR 50, 10 CFR 71 or 10 CFR 72 perspective, KS is committed to the Regulatory Requirements and Commitments listed on DQAP Appendix C, so this has no identified impact. The QATR Appendix E records indexing information, "QA Records Retention Requirements for Operating Facilities" is relevant to KPS in a historical sense only, given the NRC records exemptions cited in Section 17 of the QATR that are not reflected on Appendix C. With respect to records associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, the DQAP does apply the appropriate controls for records supporting the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

QATR "Section 18, Audits":

15) The QATR includes detail for the Fire Protection audit that the DQAP does not.

These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. The current KPS License Basis for Fire Protection is 10 CFR 50.48(f). The requirement in 10 CFR 50.48(f)(2) is for the licensee to assess the Fire Protection Program on a regular basis. DQAP Appendix D, Section B.4, includes the Fire Protection Program implementation. This is adequate to meet the requirement of 10 CFR 50.48(f). With respect to Fire Protection as related to the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, the DQAP does apply the appropriate assessment of the Fire Protection Program related to the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.

Evaluation Section II: DDG-QA-PN-001, Attachment 5.2, "QAPP Revision Process", Section II: 10 CFR 50.54/10 CFR 71.106 Evaluation Section

The table below is excerpted from EnergySolutions procedure DDG-QA-PN-001, "QA Program Implementation Plan For D&D Projects," Rev. 6, and includes the criteria of 10 CFR 50.54(a)(3), and 10 CFR 71.106(b). For purposes of clarity in this evaluation, the narrative refers to 10 CFR 50.54(a), without reference to 10 CFR 71.106.

Answer the following questions as they may apply to all changes. The question should be answered "NO" if any single change does not fit the description. If the response to all applicable questions is "YES", the proposed change is not considered a reduction in commitment and can be made without prior NRC approval.

1.	☐Yes	☒No	☐N/A	Does the proposed change involve administrative improvements and clarifications, spelling corrections, non-substantive punctuation, or editorial items?
				Explain rationale / provide basis. Although numerous changes are of this type, there are also numerous other changes that cannot be characterized as such. See Evaluation Section III for details.
2.	☒Yes	☐No	☐N/A	Does the proposed change involve the use of a QA standard approved by the NRC which is more recent than the QA standard in the licensee's current QA program at the time of the change?
				Explain rationale / provide basis. The only case of this type is in DQAP Section 17, Quality Assurance Records. The DQAP commits to more recent NIRMA standards than the QATR. See Evaluation Section III QATR Section 17 Quality Assurance Records for details.
3.	☒Yes	☐No	☐N/A	Does the proposed change involve the use of a quality assurance alternative or exception approved by an NRC safety evaluation, provided that the bases of the NRC approval are applicable to the licensee's facility? (§50.54(a)(3) only)
				Explain rationale / provide basis. The only change of this type is the additional external audit grace period that was approved for Callaway by the NRC SER. See Evaluation Section III QATR Section 18 Audits for details.
4.	☐Yes	☒No	☐N/A	Does the proposed change (to the extent allowable by the applicable facility's Technical Specifications) involve the use of generic organizational position titles that clearly denote the position function, supplemented as necessary by descriptive text, rather than specific titles, provided that there is no substantive change to either the functions of the position or reporting responsibilities?
				Explain rationale / provide basis. Although numerous changes are of this type, there are also numerous other changes that cannot be characterized as such. See Evaluation Section III for details.

5.	☐Yes	☒No	☐N/A	Does the proposed change (to the extent allowable by the applicable facility's Technical Specifications) involve the use of generic organizational charts to indicate functional relationships, authorities, and responsibilities, or, alternately, the use of descriptive text, provided that there is no substantive change to the functional relationships, authorities, or responsibilities?
				Explain rationale / provide basis. Although numerous changes are of this type, there are also numerous other changes that cannot be characterized as such. See Evaluation Section III for details.
6.	☒Yes	☐No	☐N/A	Does the proposed change involve the elimination of quality assurance program information that duplicates language in quality assurance regulatory guides and quality assurance standards to which the licensee/quality assurance program approval holder is committed?
				Explain rationale / provide basis. The only change of this type is the language regarding control of electronic records that is duplicated from the NIRMA Standards. See Evaluation Section III QATR Section 17 Quality Assurance Records for details.
7.	☐Yes	☐No	☒N/A	Does the proposed change involve organizational revisions that ensure that persons and organizations performing quality assurance functions continue to have the requisite authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations?
				Explain rationale / provide basis. Although there were numerous changes to the organization and associated responsibilities, there were no changes made relative to the organizations performing quality assurance functions to address issues with independence, authority and organizational freedom, or independence from cost and schedule.
8.	☐Yes	☐No	☒N/A	Does the proposed change, if **not** already evaluated above, **not** cause a reduction in commitment?
				Explain rationale / provide basis. All changes were evaluated above, with the detail provided in Evaluation Section III.

PREPARED BY / DATE:

Anthony R_ Bejma

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Chris R. Roache
Energy*Solutions* D&D QA

Based on the 10 CFR 50.54 (a) / 10 CFR 71.106 evaluation, do the proposed changes to the DQAP reduce the commitments of the current Dominion QATR, requiring submittal to the USNRC?

Yes __X___ No _____

Joseph R. Lynch

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Joseph R. Lynch
Kewaunee Solutions Licensing Manager

Evaluation Section III: Detailed Comparison and Evaluation

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
Cover Page	The title of the KS DQAP differs from the title of the QATR. With the new title, the revision was reset to 0. In addition, the DQAP title page includes the signatures required by the EnergySolutions administrative procedures.	These changes are administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3). Therefore, the changes are not a reduction in commitment, and may be implemented without prior NRC approval.	NO
Introduction	The Introduction of the KS DQAP differs from the Introduction of the QATR in several respects: The company names and background information differ. The detail in the QATR Introduction describing activities affecting quality is not in the DQAP Introduction. The QATR states that controls are comparable to a full range of the stages of plant life. The DQAP language is specific to a plant in decommissioning only, and describes a graded approach to quality.	Many of these changes are due to the different company names, and the fact that the QATR is a fleet program, and the DQAP is not. Not describing activities affecting quality in this section is inconsequential, since the full range of the 10 CFR 50 Appendix B criteria are included in the DQAP. These changes are administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: 1) The DQAP controls are not comparable to a full range of the stages of plant life. They are applicable to decommissioning activities only. This change is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **Reduction #1:** This change is aligned with the status of KPS in the decommissioning stage, with no plant Structures, Systems and Components (SSCs) classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the Independent Spent Fuel Storage Installation (ISFSI). It is no longer necessary to apply the level of control	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		commensurate with construction and operational activities to the KPS nonsafety-related SSCs regulated under 10 CFR 50. The DQAP does apply the appropriate level of controls to the SSCs that are Important to Safety (ITS) under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by the NUREG 1536 and NUREG 1757 compliance matrices included in the Request for Additional Information (RAI) response. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.	
Policy	There is no single Policy page in the DQAP as there is for the QATR.	Although there is no specific Policy page in the DQAP, the equivalent content of the QATR is collectively addressed in DQAP Sections 1 and 2. Therefore, this change is an administrative improvement and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3). Therefore, the change is not a reduction in commitment, and may be implemented without prior NRC approval.	NO
Basis	The DQAP is stated as meeting the requirements of 10 CFR 50 Appendix B, 10 CFR 71, Subpart H, and 10 CFR 72, Subpart G, with reference to Kewaunee-specific regulatory requirements and commitments listed within Appendix C of the DQAP. The QATR includes additional regulatory bases beyond those included in the DQAP in the aggregate. The QATR states commitment to	The changes due to the fact that the QATR is a fleet program and the DQAP is site-specific fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment. In addition, the following changes also fit the	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
	carrying out the provisions of various NRC Regulatory Guides and industry quality assurance standards of ASME, ANSI, and ANS that expound on the 18 criteria of 10 CFR 50, Appendix B, and states that specific commitments, clarifications, and alternatives are described in detail within the QATR. The QATR includes information related to applicability to the various operating plants in the fleet, and the DQAP does not.	description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, for the reasons stated: • With respect to the listing of NUREG/CR-6407 in the DQAP, this standard is integral to the implementation of Regulatory Guide (RG) 7.10. • Note that although the DQAP does not specifically list 10 CFR 21 as a program basis, 10 CFR 21 is integrally related to the commitment to 10 CFR 50, 10 CFR 71 and 10 CFR 72 in the following manner. 10 CFR 50, 10 CFR 71 and 10 CFR 72 are committed to in the DQAP. A defect in a Basic Component in the case of 10 CFR 50, or a defect in an Important-to-Safety (ITS) component in the case of 10 CFR 71 or 10 CFR 72 that creates a substantial safety hazard, is required to be reported under 10 CFR 21. Therefore, imposition of 10 CFR 21 is implied. Implementation details for reporting of defects and noncompliance in accordance with 10 CFR 21 are maintained in both the Energy*Solutions* and KS implementing procedures. • With respect to the listing of RG 7.10 and RG 4.15 in the DQAP, this content is also aligned with the current governing QA Program at Kewaunee (Dominion Energy "Nuclear Facility Quality Assurance Program Description" Topical Report DOM-QA-1, Rev. 30, Page C-21), with the exception of the RG 7.10 revision level.	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		• RG 7.10 in the QATR is Rev. 1, whereas the DQAP is Rev. 3 with consideration to the Certificate Holder RG 7.10 commitment. This is not a reduction in commitment per 10 CFR 50.54(a)(3)(i), and therefore may be implemented without prior NRC approval. This change is aligned with the following 10 CFR 50.54(a)(i) provision: (i) "The use of a QA standard approved by the NRC which is more recent than the QA standard in the licensee's current QA program at the time of the change;" However, the following change is a reduction in commitment per 10 CFR 50.54(a)(4): 2) In the aggregate, the QATR includes substantially more commitments to regulatory bases than the DQAP. This change is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **Reduction #2:** These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. The regulatory commitments in the QATR that are not referenced in the DQAP are intended to apply a level of control that is no longer required for the KPS nonsafety-related SSCs regulated under 10 CFR 50. The DQAP does apply the appropriate regulatory and quality standards to the SSCs that	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities. *Note: In subsequent sections of this Evaluation, where Regulatory Requirements and Commitments contained in the QATR but not in the DQAP are identified, the above justification is not repeated, reference is provided to this Basis Section.*	
List of Effective Sections / Contents	The List of Effective Sections in the QATR includes the following Sections that are not discreetly included in the DQAP: Policy and Basis. The QATR includes the following Appendices that are not included in the DQAP: Appendix B, Management and Independent Review Activities; Appendix D, Terms and Definitions; Appendix E, QA Records Retention Requirements For Operating Facilities; Appendix F, Augmented Quality Assurance Requirements For Selected SSCs and Programs.	In the remainder of this Evaluation, each Section / Appendix of the QATR is evaluated in context. For purposes of this List of Effective Sections / Contents, the differing indexing constitutes an administrative improvement and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3). Therefore, these changes are not a reduction in commitment, and may be implemented without prior NRC approval.	NO

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
Section 1, Organization			
Sub-Section 1.1: General Description	The content of the QATR is general in nature, and is specific to Dominion Energy Services, Inc., and/or Dominion Energy Kewaunee, Inc. The content of the DQAP is different from the QATR, and is specific to Energy*Solutions* / Kewaunee Solutions. The DQAP Appendix A Organization Chart is substantially different from the QATR Organization Charts in Appendix A of the QATR.	Although the content is different, the QATR content is general in nature, and the DQAP Section 1 does not differ in intent. Therefore, the changes in this section are aligned with the following 10 CFR 50.54(a)(3) provisions: (iii) "The use of generic organizational position titles that clearly denote the position function, supplemented as necessary by descriptive text, rather than specific titles;" (iv) "The use of generic organizational charts to indicate functional relationships, authorities, and responsibilities, or, alternately, the use of descriptive text;" Therefore, the changes are not a reduction in commitment, and may be implemented without prior NRC approval. Note that the evaluation of specific titles is included below, in the QATR section that contains the description of members of the Organization.	NO
Subsection 1.2: Responsibility and Authority	Much of the QATR content is fleet and not relevant to KPS. In 1.2.1, the QATR describes a CNO position, which is aligned with the responsibilities assigned to the President and General Manager (GM) in the DQAP. As stated in 1.2.1, the remainder of the KPS content is contained in Subsections 1.2.4.2 through 1.2.6 and Appendix A. QATR 1.2.4.2 and 1.2.5 describe responsibilities	The changes due to fact that the QATR is a fleet program and the DQAP is not fits the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment. For nearly all of the other changes, although the content is different, the DQAP Sections 1 and 2 are consistent with the QATR in intent. Therefore,	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
	that are bounded by the responsibilities ascribed to various positions in DQAP Section 1 and Section 2, although the specific language and titles differ. QATR Section 1.2.6 describes the KPS organization as separate and distinct from the fleet. The QATR description of titles and responsibilities are bounded by the responsibilities ascribed to various positions in DQAP Section 1 and Section 2, although the level of detail is more fully described in the QATR and specific language and titles differ, with the following exception: The Facility Safety Review Group (FSRG) function in the QATR is replaced by the Independent Safety Review (ISR) function in the DQAP. Subsections 1.2.7 through 1.2.9 are bounded by the responsibilities ascribed to various positions in DQAP Section 1 and Section 2, although the level of detail is more fully described in the QATR, and specific language and titles differ, with the following exception: Section 1.2.9 includes specific mention of Information Technology (IT) services, and the DQAP does not.	numerous changes in this section are aligned with the following 10 CFR 50.54(a)(3) provisions: (iii) "The use of generic organizational position titles that clearly denote the position function, supplemented as necessary by descriptive text, rather than specific titles;" (iv) "The use of generic organizational charts to indicate functional relationships, authorities, and responsibilities, or, alternately, the use of descriptive text;" However, the following change is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval: 3) The Facility Safety Review Group (FSRG) function in the QATR is replaced by the Independent Safety Review (ISR) function in the DQAP. **Reduction #3:** These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. The FSRG is a deliberative review body, and the ISR is one or more technically qualified independent individuals competent and knowledgeable in the subject area being reviewed. It is no longer necessary to apply the more complex FSRG administrative process that is suited for operating plants to review changes associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50 specific to a facility in decommissioning.	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		The ISR function described in the DQAP does apply comparable controls to review like changes to the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities. In addition, the following change is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval: 4) The QATR includes specific mention of an Information Technology (IT) services management function, and the DQAP does not. **Reduction #4:** Section 1.2 of the QATR ascribes responsibilities to the IT position, of which several are not directly related to quality measures described in the QATR. For the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI, the only potential area cited in the QATR applicable to KPS quality activities is development and maintenance of the software control program. For KPS, software controls associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72 are to be developed	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		and maintained by the Design Authority under their respective NRC approved QA programs, and are subject to oversight by KS as described in Section 7 of the DQAP. It is also recognized that IT services are a necessary support function to numerous areas of responsibility listed in DQAP Section 1.4. Notably in the case of document control/records management, DQAP Section 17 makes specific reference to the Nuclear Information and Records Management Association (NIRMA) standards. The IT management functions are integral to implementation of these standards, the details of which are included in Energy*Solutions* implementing procedures. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.	
Subsection 1.3: Succession of Responsibility for Overall Plant Operation	The QATR language applicable to KPS is bounded by the DQAP Section 1 requirements for the GM and Decommissioning Plant Manager (DPM) to designate their functions when absent.	Although the content is different DQAP Section 1 does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment.	NO

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		Therefore, the changes are not a reduction in commitment, and may be implemented without prior NRC approval.	
Subsection 1.4: Organization Charts	Addressed as applicable to KPS in Subsection 1.1 and 1.2 above.		
Subsection 1.5: Quality Standards Commitment	Addressed in Basis Section above.		
Section 2, Quality Assurance Program			
Subsection 2.1: General Description	The content of the QATR is general in nature. The content of the DQAP is different from the QATR but bounds the QATR content with one exception: The QATR states that it is based on the requirements of the Regulatory Guides and Industry Standards (with approved alternatives) described in Appendix C of the QATR. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different, DQAP Section 2 does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as noted below: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES
Subsection 2.2: Applicability	The applicability content in the QATR is general in nature, and is bounded by the DQAP Introduction and Section 2, with the following exceptions: The QATR states that the following documents further describe application of portions of the QA program, where appropriate: The Safety Analysis Report (SAR), renewed license aging	The renewed License AMP and Station Blackout are not applicable to KPS, so not addressing these requirements fits the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment.	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
	management program (AMP), nuclear design control program, physical security plan, emergency plan, radiological protection plan including radioactive material transport and radioactive waste processing, fire protection plan, station blackout program, nuclear chemistry laboratory quality assurance program. The DQAP does not make a similar statement. Appendix F of the QATR provides specific program controls to be applied to certain nonsafety-related SSCs and includes a Risk Informed Categorization description. The DQAP Appendix D requires management controls be applied to specific nonsafety-related SSCs but specific controls are not included in the DQAP.	The following differences between the QATR and the DQAP represent a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval: 5) The QATR states that numerous program documents further describe application of portions of the QA program, and the DQAP does not. The documents listed in the QATR are the Safety Analysis Report (SAR), nuclear design control program, physical security plan, emergency plan, radiological protection plan including radioactive material transport and radioactive waste processing, fire protection plan and nuclear chemistry laboratory quality assurance program. 6) The DQAP does not include a Risk Informed Categorization description and specific controls to be applied to nonsafety-related SSCs analogous to QATR, Appendix F. **Reduction #5 and #6:** These changes are commensurate with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. Although the DQAP does not make a statement comparable to the one in the QATR, the DQAP emphasizes that implementing procedures and program documents are required to include sufficient level of detail to meet applicable regulatory requirements. This will ensure that the applicability of the DQAP and the appropriate	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		portions of the DQAP as they relate to implementing procedures and program documents will be clearly described. It is no longer necessary to apply the classification system represented by the Risk Informed Categorization, and pre-established minimum QA requirements, to nonsafety-related SSCs regulated under 10 CFR 50. DQAP Section D requires the continued application of formal administrative controls to those SSCs that warrant augmented quality requirements during all phases of decommissioning. KS will maintain other regulatory programs (e.g., physical security plan, emergency plan, radiological protection plan, radioactive material transport not addressed in 10 CFR 71, and radioactive waste processing) that establish measures to ensure KS decommissioning activities are conducted in accordance with the applicable regulatory requirements, with a focus on safety, quality and compliance. The absence of detail in the DQAP for these program areas does not diminish KS commitment or responsibility for compliance. Additionally, it is no longer necessary to apply the classification system represented by the Risk Informed Categorization, and pre-established minimum QA requirements, to nonsafety-related SSCs regulated under 10 CFR 50. DQAP Section D requires the continued application of administrative controls to those SSCs that warrant augmented quality requirements during decommissioning. *Summary for Reduction #5 and #6:* The DQAP does apply the appropriate level of controls in the administrative processes associated with decommissioning and SSCs that are Important to	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities. This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	
Subsection 2.3: Oversight of the Quality Program Implementation	The content in the QATR is general in nature and is bounded by the DQAP Introduction and Sections 2, 10 and 18, with the following exceptions: The review groups described in the QATR Appendix B are the MSRC (offsite) and FSRG (onsite). The DQAP replaces the MSRC with the IMA, and the FSRG with the ISR.	Although the content is different, DQAP Sections 2, 10 and 18 in the aggregate do not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: 7) The QATR Management Safety Review Committee (MSRC) was replaced with the Independent Management Assessment (IMA) in the DQAP. (Note that the QATR FSRG was replaced with the DQAP ISR – this was addressed in Subsection 1.2 of this evaluation)	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		Reduction #7: These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. The MSRC is a deliberative review body, and the IMA is one or more technically qualified independent individuals competent and knowledgeable in the subject area(s) being reviewed. It is no longer necessary to apply the composition of the MSRC to evaluate the KS QA program implementation and effectiveness associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50. The IMA is a comparable administrative process to evaluate the effectiveness of the KS QA program as it applies to decommissioning under 10 CFR 50, and for assessment of activities associated with the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities. This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
Subsection 2.4: Identification of Structures, Systems, and Components (SSC)	The content in the QATR is general in nature and is bounded by the DQAP Appendix B.	Although the content is different DQAP Appendix B does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment.	NO
Subsection 2.5: Selection, Training, and Qualification of Personnel	The content in the QATR is general in nature and is bounded by the DQAP Section 2 and Appendix D, except as follows: The QATR cites 10 CFR 50.120, the DQAP does not. The QATR provides detailed description and specific requirements for the following specific positions, and the DQAP does not: The Plant Manager, the KPS manager responsible for Operations and Maintenance, the KPS manager responsible for Technical Support functions, the KPS manager responsible for directing one or more Facility Programs and Processes described in 1.2.6.4 (Facility Programs and Processes), the KPS manager having overall responsibility for directing Radiological Protection and Chemistry activities (when other than the Radiation Protection Manager), and Supervisory Personnel principally responsible for directing the actions of operators, technicians, or repairmen. The DQAP Appendix D requires that facility staff responsible for the safe storage of nuclear fuel and selected decommissioning activities shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as defined in approved	Although the content is different, except as noted, DQAP Section 2 and Appendix D do not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: 8) The QATR cites 10 CFR 50.120 and the DQAP does not. 9) The detailed content of the QATR for training and qualifications for staff positions was replaced with DQAP Appendix D, Section B, 3.1. These changes are a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **Reduction #8 and #9:** These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply the level of control of the 10 CFR 50.120 Systems Approach to Training (SAT) process to staff qualifications associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50, nor is it	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
	procedures except for: a) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and relies upon administrative procedures (management controls) to provide the details.	necessary to provide detailed descriptions of the qualification requirements for plant staff positions in the QA program. KS will maintain required regulatory programs (e.g., Radiation Protection, Radioactive Waste, Final Status Survey, Security) that establish measures to require, conduct and control training/qualifications to ensure KS decommissioning activities are executed in accordance with the applicable regulatory requirements through the sets of implementing procedures. The DQAP Section 2 training requirements provide an appropriate level of controls for the training requirements for decommissioning and ISFSI/Operations staff performing activities under the scope of the DQAP, including any specific training required by the License. The DQAP Appendix D Section B, 3.1 requirement is an appropriate administrative process for establishing qualification requirements for staff conducting decommissioning activities conducted under 10 CFR 50, and for establishing qualification requirements associated with the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
Subsection 2.6: Control of Activities	The content in the QATR is general in nature and is bounded by all Sections in the DQAP.	Although the content is different, the DQAP in the aggregate does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment.	NO
Subsection 2.7: Quality Standards Commitment	Addressed in Basis Section above.		
Section 3, Design Control	The content in the QATR is general in nature and is bounded by the DQAP, with the following exceptions: The QATR Subsection 3.2.5 includes specific requirements for setpoint control. Although the DQAP does not include these requirements to the level of detail as in the QATR, DQAP Sections 5 and 11 bound the intent of the QATR. The QATR Subsection 3.2.4 includes requirements for software design and control. The DQAP does not. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different in general, and differs as related to setpoint control, DQAP Sections 5 and 11 in the aggregate do not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as noted below: 10) The absence of controls for software in the DQAP is a reduction in commitment per 10 CFR 50.54(a)(4) and therefore may not be implemented without prior NRC approval. This change is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **Reduction #10**: This change is aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply the level of control to software associated with the KPS	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		nonsafety-related SSCs regulated under 10 CFR 50. With respect to software controls associated with SSCs that are Important to Safety (ITS) under 10 CFR 71 and 10 CFR 72, DQAP Appendix B states that any design changes (that would employ software as part of the design process) to ITS SSCs would be made by the specific Design Authority, including Energy*Solutions*, under their QA Program, not the DQAP. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities. This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	
Section 4, Procurement Document Control	The content in the QATR is general in nature and is bounded by the DQAP primarily in Section 4, but additional language related to suppliers is also included in DQAP Sections 1, 7 and 18. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different in general, DQAP Sections 1, 7 and 18 in the aggregate do not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, with the following exception:	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	
Section 5, Instructions, Procedures, and Drawings	The content of Subsections 5.1 through 5.3 in the QATR is general in nature and is bounded by DQAP Section 5, and in numerous other DQAP sections in context, with the following exceptions: QATR Sub-section 5.2 provides more explicit detail in the administrative execution of procedures than the DQAP, and includes a provision for suspending procedure adherence in emergency conditions that is not included in the DQAP. QATR Sub-section 5.4 includes much detail about the types of procedures but does allow for flexibility in applicability of the procedure types by plant. In addition, there is a Sub-section 5.4.17 specific to KPS. The DQAP does not provide the different types of procedures listed in the QATR, but the KPS procedures listed in QATR Sub-section 5.4.17 are included in DQAP Appendix D. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different in general, DQAP Section 5 and Appendix D in the aggregate do not differ from the QATR in intent. The detail in the QATR for the administrative execution of procedures is standard content found in administrative procedure processes. The provision for suspending procedure adherence in emergency conditions is also a typical administrative component, one that is much more relevant to an operating reactor. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, with the following exception: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
Section 6, Document Control	The content of Subsections 6.1 through 6.3 in the QATR is general in nature, and is bounded by DQAP Section 6, and in numerous other DQAP sections in context, with the following exceptions: The QATR lists of documents to be controlled is more detailed than the DQAP. The QATR includes specific detail on review requirements (e.g., a specific requirement for QA to review changes to inspection procedures), and the DQAP does not. QATR Section 6.4 includes additional operational review controls, including the FSRG, and includes controls for temporary procedure changes. The DQAP does not include additional operational review controls in Section 6 and does not include controls for temporary procedure changes. However, DQAP Appendix D includes the ISR, which replaces the FSRG. QATR Section 6.5 includes additional detail for administrative elements of control (e.g. use of an index) than the DQAP. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different in general, DQAP Section 6 and Appendix D in the aggregate do not differ from the QATR in intent. The detail in the QATR for the administrative execution of procedures is standard content found in administrative procedure processes. The provision for suspending procedure adherence in emergency conditions is also a typical administrative component, one that is much more relevant to an operating reactor. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, with the following exceptions: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES
Section 7, Control of Purchased Material, Equipment, and Services	The content in Subsections 7.1 through 7.4 in the QATR is general in nature, and is bounded by DQAP Sections 7, 10 and 18, with the following exceptions: The QATR includes NUPIC, which is not applicable to the DQAP (ES/KS are not NUPIC members). The QATR specifically lists	Although the content is different in general, DQAP Sections 7, 10 and 18 in the aggregate do not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3),	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
	NRC correspondence as it relates to supplier evaluation, the DQAP does not. The QATR has a more detailed description than the DQAP on selection of suppliers, measures for acceptance and quality verifications. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. Note that the DQAP Section 7 includes content for conduct of Supplier audits that was in QATR Section 18. The changes are described in Section 18 of this Evaluation.	that are not a reduction in commitment, with the following exception: 11) The QATR has additional detail in the QATR on selection of suppliers, measures for acceptance and quality verifications, and reference to NRC correspondence that the DQAP does not. DQAP is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **Reduction #11:** These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply the level of detail to suppliers associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50. With respect to suppliers associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, these suppliers are identified in DQAP Appendix B, with the exception of the supplier which will be providing the GTCC transportation packages in the future. In this case, the potential list of suppliers is limited to those suppliers with NRC approved QA programs, that hold an NRC issued Certificate of Compliance (CoC) for the GTCC transportation package. The DQAP does apply the appropriate thoroughness for the control of purchased items and services for the SSCs that are Important to	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities. This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	
Section 8, Identification and Control of Materials, Parts, and Components	The content in the QATR is general in nature and although somewhat more detailed than the DQAP, is bounded by DQAP Section 8, except as follows: This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different, DQAP Section 8 does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
Section 9, Control of Special Processes	The content in the QATR is general in nature and although somewhat more detailed than the DQAP, is bounded by DQAP Section 9, except as follows: This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different, DQAP Section 9 does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES
Section 10, Inspection	The content in the QATR is general in nature and is bounded by DQAP Sections 2 and 10, except as follows: This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different, DQAP Sections 2 and 10 do not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES
Section 11, Test Control	The content in the QATR is general in nature and includes substantially more detail than DQAP Section 11. The additional detail includes detail related to preoperational testing, startup testing, and scheduling.	Although the content is different, DQAP Section 11 does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
	This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: 12) The additional detail related to preoperational testing, startup testing, and scheduling, is largely irrelevant, but not 100% irrelevant. This represents a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval (Ref. Basis Section above). **Reduction #12:** These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply an operational plant level of control to tests associated with the KPS nonsafety-related SSCs regulated under 10 CFR 50. With respect to tests associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, the DQAP does apply the appropriate controls to testing the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	
Section 12, Control of Measuring and Test Equipment	The content in the QATR is general in nature and is at a comparable level of detail with DQAP Section 12. DQAP Section 12 contains additional detail on calibration accuracies, and more detail on general administrative processes associated with M&TE control. The QATR includes reference to commercial grade dedication of calibration services that is included in DQAP Section 4. The QATR describes installed Instrument and Control devices, the DQAP does not. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content is different, DQAP Sections 4 and 12 do not differ from the QATR in intent. With respect to the detail for installed Instrument and Control devices in the QATR, this is explicitly stated as being for the operations phase of the facilities. Therefore it is not applicable to KPS decommissioning activities. Also, there is additional detail in the DQAP that is additive. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
Section 13, Handling, Storage, and Shipping	The content in the QATR is general in nature and is at a comparable level of detail with DQAP Section 13. DQAP Section 13 contains additional detail related to 10 CFR 71 licensed shipments that is not included in the QATR. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content differs somewhat, DQAP Section 13 does not differ from the QATR in intent. The additional detail in the DQAP is additive, and is acceptable based on the fact that the DQAP is considered a Quality Assurance Project Plan (QAPP) under the ES-QA-PG-001 "Energy*Solutions* Quality Assurance Program", which is approved by the NRC under 10 CFR 71, on Form 313, Approval Number 0935, Rev. 10, dated 7/5/19 (included in this submittal. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES
Section 14, Inspection, Test, and Operating Status	The content in the QATR includes substantially more detail than DQAP Section 14. The additional detail includes authority for implementing controls, temporary controls, independent verifications, and operational considerations particular to SSCs at an operating reactor. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although there is substantially more detail in the QATR, the content that is in the DQAP Section 14 does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: 13) The additional detail in the QATR that is not in the DQAP related to the authority for implementing controls, temporary controls, independent verifications, and operational	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		considerations particular to SSCs at an operating reactor. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **Reduction #13:** These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply an operational plant level of control to implementing controls, temporary controls, independent verifications, and operational considerations to the KPS nonsafety-related SSCs regulated under 10 CFR 50 and associated with a plant in decommissioning as compared to the operational considerations described in the QATR. With respect to these types of controls associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, the DQAP does apply the appropriate controls for the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities.	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	
Section 15, Nonconforming Materials, Parts, or Components	The content in the QATR is general in nature and is at a comparable level of detail with DQAP Section 15. The QATR includes a specific reference to 10 CFR 21 that is not in the DQAP. The QATR includes detail related to a conditional release process that is not in the DQAP. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Although the content differs somewhat, DQAP Section 15 does not differ from the QATR in intent. The reference to 10 CFR 21 is explained previously in this Evlaution, see "Basis Section". A conditional release process is an administrative convenience, not a requirement. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	YES
Section 16, Corrective Action	The content in the QATR is general in nature and is at a comparable level of detail with DQAP Section 16. The QATR includes a specific reference to 10 CFR 21 that is not in the DQAP. The QATR includes an independent assessment of corrective actions that is included indirectly in the DQAP, by virtue of the internal audit requirements for DQAP implementing activities.	Although the content differs somewhat, DQAP Section 16 does not differ from the QATR in intent. The reference to 10 CFR 21 is explained previously in this Evlaution, see "Basis Section". The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows:	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
	This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	
Section 17, Quality Assurance Records	The content in the QATR includes more detail than DQAP Section 17. The additional detail includes detail related to records indexing (including the Appendix E), implementation of NIRMA standards, and records control and storage measures. The NIRMA standards cited in the DQAP are more recent revisions that those cited in the QATR. The QATR Section 17 commits to the following: • NIRMA TG-11-1998 • NIRMA TG-15-1998 • NIRMA TG-16-1998 • NIRMA TG-21-1998 The DQAP Section 17 commits to the following: • NIRMA TG11-2011 • NIRMA TG15-2011 • NIRMA TG16-2017 • NIRMA TG21-2011 This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	Since the DQAP Section 17 commits to the NIRMA standards, the fact that the DQAP does not include detail contained in the NIRMA standards is not a reduction in commitment per 10 CFR 50.54(a)(3)(v), and therefore may be implemented without prior NRC approval. This change is aligned with the following 10 CFR 50.54(a)(v) provision: (v) "The elimination of quality assurance program information that duplicates language in quality assurance regulatory guides and quality assurance standards to which the licensee is committed;" With respect to the DQAP committing to more recent NIRMA standards than the QATR, this is not a reduction in commitment per 10 CFR 50.54(a)(3)(i), and therefore may be implemented without prior NRC approval. This change is aligned with the following 10 CFR 50.54(a)(i) provision: (i) "The use of a QA standard approved by the NRC which is more recent than the QA standard in the licensee's current QA program at the time of the change;"	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		Previous revisions of these NIRMA guidelines have been endorsed by RIS 2000-18, Guidance on Managing Quality Assurance Records in Electronic Media, dated October 23, 2000. In the case of the additional detail related to records control and storage measures, although the content differs, the DQAP does not differ from the QATR in intent. The changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: 14) The QATR includes detail related to records indexing (including the Appendix E) not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **Reduction #14:** These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. It is no longer necessary to apply operational plant level of indexing and control to records associated with the SSCs regulated under 10 CFR 50. With respect to the removal of records indexing detail from the DQAP, whether from the 10 CFR 50, 10 CFR 71 or 10 CFR 72 perspective, KS is committed to the Regulatory Requirements and Commitments listed on DQAP Appendix C, so this is without impact. The QATR Appendix E records	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		indexing information, "QA Records Retention Requirements for Operating Facilities" is relevant to KPS in a historical sense only, given the NRC records exemptions cited in Section 17 of the QATR that are not reflected on Appendix C. With respect to records associated with SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, the DQAP does apply the appropriate controls for records supporting the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, via the controls aligned with Regulatory Guide 7.10. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities. This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	
Section 18, Quality Assurance Audits	The content in the QATR is at a comparable level of detail with DQAP Section 18. The QATR Section 18 includes a specific reference to annual evaluation of suppliers, whereas the DQAP Section 7 states timing of supplier evaluations at intervals commensurate with	In the DQAP, content related to Supplier audits was moved to Section 7. Subsection 7.2.1 includes a 25% (i.e. 9 month) grace period for extenuating circumstances, with specific control measures. This change is not a reduction in commitment per 10 CFR 50.54(a)(3)(ii), and therefore may be implemented	YES

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
	safety significance. The QATR includes a fire protection equipment and program implementation inspection and audit, utilizing either a qualified offsite licensed fire protection engineer, or an outside qualified fire protection consultant that the DQAP does not include. The DQAP contains a 25% grace period applied to external audits that the QATR does not include. The DQAP contains provision to conduct in-process surveillance to be credited toward audit activity that the QATR does not include. This section contains reference to Regulatory Requirements and Commitments that are not included in the DQAP.	without prior NRC approval. This change is aligned with the following 10 CFR 50.54(a)(ii) provision:: (ii) "The use of a quality assurance alternative or exception approved by an NRC safety evaluation, provided that the bases of the NRC approval are applicable to the licensee's facility;" This change is deemed acceptable based on the fact the additional grace period for external audits for extenuating circumstances was approved by the NRC with an SER in response to a request from Callaway station (Ref. SER dated August 6, 2020, ADAMS Accession No. ML20216A681). The use of in-process surveillances is an enhancement that fits the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3). Other than as described above, although the content differs somewhat, DQAP Sections 7 and 18 do not differ from the QATR in intent, so the changes fit the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment, except as follows: 15) The QATR contains detail related to the Fire Protection audit that the DQAP does not. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval.	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
		Reduction #15: These changes are aligned with the status of KPS in the decommissioning stage, with no plant SSCs classified as safety-related, and all spent fuel removed from the spent fuel pool and stored at the ISFSI. The current KPS License Basis for Fire Protection is 10 CFR 50.48(f). The requirement in 10 CFR 50.48(f)(2) is for the licensee to assess the Fire Protection Program on a regular basis. DQAP Appendix D, Section B.4, includes the Fire Protection Program implementation. This is adequate to meet the requirement of 10 CFR 50.48(f). With respect to Fire Protection as related to the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72, the DQAP does apply the appropriate assessment of the Fire Protection Program related to the SSCs that are Important to Safety under 10 CFR 71 and 10 CFR 72. The DQAP changes, combined with the implementing procedure commitments from Regulatory Guide 7.10, meet the 10 CFR 50, 10 CFR 71 and 10 CFR 72 regulations, as demonstrated by compliance with NUREG 1536 and NUREG 1757 as detailed in individual compliance matrices. Therefore, the changes do not reduce the overall effectiveness of the DQAP as it is applied to the ISFSI and planned decommissioning activities. This section also contains reference to Regulatory Requirements and Commitments that are not included in the DQAP. This is a reduction in commitment per 10 CFR 50.54(a)(4), and therefore may not be implemented without prior NRC approval. **[See Reduction #2 – "Basis Section"]**	

QATR Section	Change(s)	Evaluation and Justification	Prior NRC Approval?
Appendix A, Organizational Relationships of Key Management and Functional Groups	Addressed as applicable to KPS in Subsection 1.2.1 and 1.2.2 above.		
Appendix B, Management and Independent Review Activities	Addressed as applicable to KPS in Section 1 and 2 above.		
Appendix C, Regulatory Guides and Quality Standards Commitments	Addressed as applicable to KPS in Basis Section above.		
Appendix D, Terms and Definitions	The QATR Appendix D is a detailed list of definitions that is not included in the DQAP.	The definitions are a useful administrative tool, but are not required, and the omission of these in the DQAP aligns with the description of administrative improvements and clarifications, spelling corrections, punctuation, or editorial items as described in 10 CFR 50.54(a)(3), that are not a reduction in commitment.	No
Appendix E, QA Records Retention Requirements For Operating Facilities	Addressed as applicable to KPS in Section 17 above.		
Appendix F, Augmented Quality Assurance Requirements For Selected SSCs and Programs	Addressed as applicable to KPS in Section 2 above.		

ATTACHMENT 3

KS DQAP Compliance Matrix to NUREG 1536

56 PAGES

KEWAUNEE POWER STATION

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
14.5.1 Quality Assurance Organization The QAPD should describe the structure, interrelationships, and areas of functional responsibility and authority for all organizational elements that will perform activities related to quality and safety. The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	The structure, interrelationships, and areas of functional responsibility and authority for all organizational elements that will perform activities related to quality and (radiological / nuclear) safety are described throughout DQAP Section 1. In addition, a high level organizational structure of functional areas is also presented in DQAP Appendix A.
a. Measures to retain and exercise responsibility for the QA program. The assignment of responsibility for the overall QA program in no degree relieves line management of their responsibility for the achievement of quality.	Measures to retain and exercise responsibility for the QA program are described throughout DQAP Section 1. The following excerpt from DQAP Section 1 addresses the line management responsibility for the achievement of quality: *"Management of line organizations at KPS are responsible to ensure that the quality of organizational work and activities meets the requirements set forth in the DQAP and KPS implementing procedures." [1.2.5]*
b. Measures to identify and describe the QA functions performed by the applicant's QA organization or delegated to other organizations that will provide controls to ensure implementation of the applicable elements of the QA criteria.	Measures to identify and describe the QA functions performed by the applicant's QA organization are described in the "Quality Assurance" sub-section of DQAP Section 1. The following excerpt from DQAP Section 1.5 addresses the QA functions delegated to other organizations: "*KS may delegate the execution of portions of the work under the DQAP to others such as contractors, agents, or consultants; however, KS retains overall responsibility for those activities and the DQAP. Delegation is clearly identified in documentation and KS retains the right to verify compliance with KS quality and regulatory requirements applicable to that organization's QA Program. QA program interactions, management responsibilities, and authority for the coordinated execution of the overall QA program, are established and documented."[1.5.1]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
c. Measures to provide clear management controls and effective lines of communication should exist between the applicant's QA organizations and suppliers to ensure proper direction of the QA program and resolution of QA problems.	The following excerpt from the "Quality Assurance" sub-section of DQAP Section 1 includes this responsibility assigned to the QAM: *"Establishing lines of communication and control measures between the QA organization and suppliers to ensure appropriate QA program direction and provide for resolution of QA issues." [1.3.1.D]* DQAP Section 7 states: *"Procedures shall describe each organization's responsibilities for the control of purchased material, equipment, and services including the interfaces between all affected organizations." [7.1]*
d. Measures to identify onsite and offsite organizational elements that will function under the purview of the QA program and the lines of responsibility.	The following excerpts from DQAP Section 1 include this requirement: • *"Onsite and offsite organizations shall be established for decommissioning activities. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear fuel. [1.1.3]* • *Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to include all organizational positions responsible for decommissioning activities. These relationships shall be documented and updated as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation."[1.1.4]* The following excerpt from the "Station Management" sub-section of DQAP Section 1 also addresses this requirement: *"Management may be comprised of on-site and off-site staff, and individuals may be responsible for more than one functional area." [1.4.8]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
e. Measures to ensure that high-level management is responsible for documenting and promulgating the applicant's QA policies, goals, and objectives, and this management level should maintain a continuing involvement in QA matters. The application should also describe the lines of communication between intermediate levels of management and between this position and the Manager (or Director) of QA.	The following excerpt from DQAP Section 1 establishes direct linkage from the highest management level to the GM: *"The General Manager (GM) reports to the Kewaunee Solutions President, and has the overall responsibility for the establishment and execution of the DQAP." [1.1.2]* The GM responsibilities are included throughout DQAP Section 1, and include reviewing and approving the DQAP, which embodies the KS QA policies, goals, and objectives, as well as maintaining a continuing involvement in QA matters. The following excerpts from DQAP Section 1 address the requirement for establishing communication through the various levels of the organization and between the GM and QAM: • *"Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to include all organizational positions responsible for decommissioning activities. [1.1.4]* • *The QAM reports to the GM and shall not be assigned responsibilities that would prevent the required attention to important to safety matters. Although reporting to the GM with other line organizations, the QAM shall have the necessary independence from other line management to ensure effective oversight for all organizations." [1.3.1]*
f. Measures to designate a position that retains overall authority and responsibility for the QA program.	The following excerpt from DQAP Section 1 addresses this requirement: *"The General Manager (GM) reports to the Kewaunee Solutions President, and has the overall responsibility for the establishment and execution of the DQAP." [1.1.2]*
g. Measures to provide authority and independence of the individual responsible for managing the QA program should be such that he or she can direct and control the organization's QA program, effectively ensure conformance to quality requirements, and remain sufficiently independent of undue influences and responsibilities of schedules and costs. In addition, measures to	The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 addresses this requirement: • *"The QAM reports to the GM and shall not be assigned responsibilities that would prevent the required attention to important to safety matters. Although reporting to the GM with*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
have this individual report to at least the same organizational level as the highest line manager directly responsible for performing activities affecting quality.	*other line organizations, the QAM shall have the necessary independence from other line management to ensure effective oversight for all organizations." [1.3.1]* • *"The individuals who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions." [1.3.4]* In addition, as shown on DQAP Exhibit A and as described in Section 1, line managers directly responsible for performing activities affecting quality report to the GM, and the QAM reports to the GM.
h. Measures for individuals or groups responsible for defining and controlling the content of the QA program and related manuals to have appropriate organizational position and authority, as should the management level responsible for final review and approval.	The following excerpt from DQAP Section 1 establishes the organizational position and authority for the DQAP: *"The General Manager (GM) reports to the Kewaunee Solutions President, and has the overall responsibility for the establishment and execution of the DQAP." [1.1.2]* DQAP review and approval responsibilities are addressed in this excerpt from the "Responsibilities" sub-section of DQAP Section 1: *"The DQAP is reviewed and approved by the Quality Assurance Manager (QAM), and the GM." [1.2.2]*
i. Measures describing the qualification requirements for the principal QA management positions so as to demonstrate management and technical competence commensurate with the responsibilities of these positions.	The following excerpt from DQAP Section 2 applies to the QAM position: *"Members of the KS staff (including audit and inspection personnel) shall have the appropriate qualifications necessary to perform their assigned duties defined in implementing procedures. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, Appendix D of the DQAP cites references that stipulate the use of specific industry standards addressing qualifications." [2.2.2]* The following excerpt from DQAP Appendix D, Section 3.1 applies to the QAM position: *"Facility staff responsible for the safe storage of nuclear fuel and selected decommissioning activities*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as defined in approved procedures..."
j. Measures to ensure conformance to established requirements be verified by individuals or groups who do not have direct responsibility for performing the work being verified. The quality control function may be part of the line organization provided that the QA organization performs periodic surveillance to confirm sufficient independence from the individuals who performed the activities.	The following excerpt from the "Quality Assurance" sub-section of DQAP Section 1 addresses the first sentence of this requirement: *"Quality Assurance (QA) personnel report directly to the QAM and implement the relevant provisions of the DQAP utilizing written implementing procedures. They perform independent oversight of line functions and activities. A member of the QA organization shall not perform oversight of activities for which the member has direct responsibility." [1.3.2]* The following excerpt from DQAP Section 10 addresses the second sentence of the requirement: *"QA surveillance will be conducted periodically to confirm sufficient independence from the individuals who performed the activities for inspections performed by groups other than QA." [10.6]*
k. Persons and organizations performing QA functions should have direct access to management levels that will ensure accomplishment of quality-affecting activities. These individuals should have sufficient authority and organizational freedom to perform their QA functions effectively and without reservation. In addition, they should be able to identify quality problems; initiate, recommend, or provide solutions through designated channels; and verify implementation of solutions.	The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 addresses the first two sentences of this requirement: *"QA personnel shall have sufficient authority and organizational freedom to identify any quality problems and to verify implementation of corrective actions. Additionally, QA personnel shall have direct access to appropriate levels of management necessary to perform their function and shall be independent from cost and schedule when opposed to quality and nuclear safety considerations." [1.3.3]* The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 addresses the last sentence of this requirement: *"QA personnel shall have sufficient authority and organizational freedom to identify any quality problems and to verify implementation of corrective actions." [1.3.3]*

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l. Designated QA individuals or organizations should have the responsibility and authority, delineated in writing, to stop unsatisfactory work and control further processing, delivery, or installation of nonconforming material. In addition, the application should describe how stop-work requests will be initiated and completed.	The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 addresses the first two sentences of this requirement: • *"The QAM has the following responsibilities: Authority to stop work when quality is adversely affected." [1.3.1.F]* • *"Quality Assurance (QA) personnel... have the responsibility and authority to stop work when quality is adversely affected and immediately raise concerns to the QAM." [1.3.2]* Details on the stop-work process are included in implementing procedures.
m. Measures to determine the extent of QA controls to be determined by the QA staff in combination with the line staff and to depend upon the specific activity or item complexity and level of importance to safety.	The DQAP Introduction states: *"The implementation of the DQAP is executed through implementing procedures in a graded approach commensurate with the items' and activities' importance to safety."* DQAP Section 2 states: *"Implementation of the DQAP is controlled through separately issued implementing procedures, instructions, and drawings. Each organization is responsible for ensuring that the applicable portions of the DQAP are properly documented, approved, and implemented (with trained staff, necessary materials, and approved procedures available) before an activity within the scope of the DQAP is executed." [2.1.3]* DQAP Section 2 sub-section "Performance / Verification" includes the following requirement: *"Work is accomplished and verified using instructions, procedures, or other appropriate means that are of a detail commensurate with the activity's complexity and importance to safety." [2.3.3]* The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 assigns the following responsibilities to the QAM: • *"Assuring important to safety activities at KPS are performed in accordance with implementing procedures [1.3.1.B]*

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	• *Managing the performance of audits, surveillances, and inspections in order to verify that important to safety activities have been correctly performed" [1.3.1.C]* DQAP Section 7 states: • *"Procedures shall describe each organization's responsibilities for the control of purchased material, equipment, and services including the interfaces between all affected organizations. [7.1]* • *The processes shall use a graded approach applying considerations of a material's, component's or service's importance to safety, complexity, and history of previous use." [7.2]*
14.5.2 Quality Assurance Program The QAPD should provide acceptable evidence that the applicant's proposed QA program will be well-documented, planned, implemented, and maintained to provide the appropriate level of control over activities and SSCs consistent with their relative importance to safety. The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	The DQAP Introduction states: *"The DQAP reflects the quality activities pertaining to a decommissioning nuclear site through compliance with established regulatory requirements set forth by the NRC. The DQAP ensures the protection of the public health and safety through performance-based assessments and compliance-based auditing utilizing implementing procedures and instructions. The DQAP describes the responsibilities for implementing important to safety requirements, establishing and maintaining the DQAP, and assessing the performance of activities subject to the DQAP. "* DQAP Section 2 states the following: *"The DQAP includes specific monitoring activities which are measured against acceptance criteria in a manner sufficient to provide KS management assurance that the important to safety activities are performed in an acceptable manner." [2.1.1]*
a. Measures used to ensure that the QA program meets applicable acceptance criteria.	DQAP Section 2 states the following: *"The DQAP includes specific monitoring activities which are measured against acceptance criteria in a manner sufficient to provide KS management assurance that the important to safety activities are performed in an acceptable manner." [2.1.1]*

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b. Measures for management to regularly assess the effectiveness of the QA program. In addition, measures for management (above and beyond the QA organization) to regularly assess the scope, status, adequacy, and compliance of the QA program to the requirements of 10 CFR Part 72. Measures to provide for management's frequent contact with program status through reports, meetings, and audits as well as performance of a periodic assessment that is planned and documented with corrective action identified and tracked.	The following excerpts from the "Responsibilities" and "Reporting" sub-sections of DQAP Section 1 provides the means for management to regularly assess the effectiveness of the QA program, including the scope, status, adequacy, and compliance of the QA program to the requirements of 10 CFR Part 72: • *"The GM is responsible for apprising management of the effectiveness of the DQAP implementation and is the arbitrator for non-conformances of unusual complexity. The GM also directs actions to be taken based on reports and trending of quality issues submitted by the QAM. [1.2.4]* • *Management of line organizations at KPS are responsible to ensure that the quality of organizational work and activities meets the requirements set forth in the DQAP and KPS implementing procedures. [1.2.5]* • *The GM shall periodically have an Independent Management Assessment (IMA) performed to evaluate the effectiveness of the DQAP, as described in Appendix D* of the DQAP." *[1.6.2]* The following excerpt from the "Reporting" sub-section of DQAP Section 1 provides for management's frequent contact with program status through reports, meetings: *"KS management is involved with QA matters on a continuing basis. Periodic reports summarizing the quality of KPS activities are reviewed and approved by the QAM. These reports contain status of the program adherence to the DQAP, issues identified, unresolved items, and/or other items of interest. These reports are submitted to the GM and other KS management as deemed appropriate." [1.6.1]* The following excerpt from DQAP Section 18 addresses the reporting of audits to management: *"Results of audits are reviewed with the management of the organization audited. Responsible management in the areas audited shall implement the necessary corrective actions required to address deficiencies. These actions are documented and reviewed periodically and, if needed, re-examined during re-audits of*

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	the subject area to verify deficient areas have completed corrective actions." [18.8] The following excerpt from DQAP Appendix D, Section A, 1.0, provides additional detail on use of the IMA as a periodic assessment that is planned and documented with corrective action identified and tracked: *"The IMA results are communicated via a written report in a timely manner to a level of management having the authority to execute effective corrective action. In addition, these results are reported to the KS management team through the GM."*
c. Measures used to ensure that trained, qualified personnel within the organization will be assigned to determine that functions delegated to contractors are properly accomplished.	DQAP Section 2 sub-section Personnel Training and Qualifications" states: *"Individual managers are responsible for ensuring that personnel working under their cognizance are provided with the necessary indoctrination training and resources to accomplish assigned activities which fall under the scope of the DQAP." [2.2.1]* The following excerpt from DQAP Section 1.5 establishes that: "*KS may delegate the execution of portions of the work under the DQAP to others such as contractors, agents, or consultants... Delegation is clearly identified in documentation and KS retains the right to verify compliance with KS quality and regulatory requirements applicable to that organization's QA Program."[1.5.1]* Sections 7 and 18 of the DQAP provides for the audit/surveillance of contractor QA programs, subcontractors, consultants, and vendors furnishing equipment or services to the KS or its contractors, and for the frequency and method of this evaluation.
d. Summarizations of the corporate QA policies, goals, and objectives and establishment of a meaningful channel for transmittal of these policies, goals, and objectives down through the levels of management.	The following excerpt from DQAP Section 1 establishes direct linkage from the highest management level to the GM: *"The General Manager (GM) reports to the Kewaunee Solutions President, and has the overall responsibility for the establishment and execution of the DQAP." [1.1.2]* The GM responsibilities are included throughout DQAP Section 1, and include reviewing and approving the DQAP, which embodies the KS QA policies, goals, and objectives.

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	The following excerpt from DQAP Section 1 addresses the requirement for establishing communication through the various levels of the organization: "*Lines of authority, responsibility and communication shall be established and defined for the highest management levels through intermediate levels to include all organizational positions responsible for decommissioning activities.*" *[1.1.4]*
e. Measures to designate responsibilities for implementing the major activities addressed in the QA manuals.	Specific requirements for major delegation are included in the following sections of the DQAP: • For the GM, the "Responsibilities" sub-section of DQAP Section 1 states "*The individual shall delegate in writing the succession to this responsibility during their absence.*" *[1.2.3]* • The "Station Management" sub-section of DQAP Section 1 states: "*The GM delegates to the KS management team the day-to-day responsibilities for the ISFSI and decommissioning*", and that the DPM "*...shall delegate in writing the succession to this position during their absence.*" *[1.4.1, 1.4.2]* • DQAP Section 1 sub-section "Delegation of Work" addresses delegation of the execution of portions of the work under the DQAP to others such as contractors, agents, or consultants. *[1.5.1]*
f. Measures to control the distribution of the QA manuals and revisions.	The following excerpts from DQAP Section 6 include control and distribution of QA manual and revisions: • "*The program will control the development, review, approval, issue, use, and revision of documents, as applicable. [6.1]* • *The scope of the document control program includes, but is not limited to: Procedures, Manuals, Plans, Directives, Policies, Instructions, etc..." [6.3.E]*

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g. Measures for communicating to all responsible organizations and individuals that policies, QA manuals, and procedures are mandatory requirements.	The following excerpt from DQAP Section 1 establishes direct linkage from the highest management level to the GM: *"The General Manager (GM) reports to the Kewaunee Solutions President, and has the overall responsibility for the establishment and execution of the DQAP." [1.1.2]* The GM responsibilities are included throughout DQAP Section 1, and include reviewing and approving the DQAP, which embodies the KS QA policies, goals, and objectives. The "Responsibilities" sub-section of DQAP Section 1 directs management to ensure the requirements established in the DQAP and implementing procedures are met (i.e., made the requirements mandatory): *"Management of line organizations at KPS are responsible to ensure that the quality of organizational work and activities meets the requirements set forth in the DQAP and KPS implementing procedures." [1.2.5]*
h. Measures to provide a comprehensive listing of QA procedures, plus a matrix of these procedures cross-referenced to each of the QA criteria, to demonstrate that the QA program will be fully implemented by documented procedures.	The DQAP Introduction states: *"The implementation of the DQAP is executed through implementing procedures in a graded approach commensurate with the items' and activities' importance to safety."* DQAP Section 2 states: *"Implementation of the DQAP is controlled through separately issued implementing procedures, instructions, and drawings. Each organization is responsible for ensuring that the applicable portions of the DQAP are properly documented, approved, and implemented (with trained staff, necessary materials, and approved procedures available) before an activity within the scope of the DQAP is executed." [2.1.3]* The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 assigns the following responsibilities to the QAM: • *"Assuring important to safety activities at KPS are performed in accordance with implementing procedures" [1.3.1.B]*

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	Implementing procedures detail the administrative process of the identification of DQAP implementing procedures for each of the QA criteria.
i. Identification of the structures, systems, and components (SSCs) that are important to safety and how they will be controlled by the QA program.	DQAP Section 2 states: *"The DQAP requirements apply to SSCs designated as important to safety identified in Appendix B* of the DQAP." *[2.1.1]* DQAP Appendix B provides a listing of these. As stated, the DQAP requirements apply to these ITS SSCs identified on Appendix B of DQAP.
j. Measures for review and documents to show agreement with the QA program provisions of its suppliers to ensure implementation of a program meeting the QA criteria.	DQAP Section 7 states: • *"Procedures shall describe each organization's responsibilities for the control of purchased material, equipment, and services…Controls shall include the review and acceptance of supplier documents by the appropriate organization, including compliance to the technical and quality requirements specified in the procurement documents, as required. [7.1]* • *Receiving inspection shall verify, by review of objective evidence, the material and equipment conform to the procurement documents, including applicable technical and quality requirements. [7.2.4]* • *Effectiveness of the control of quality by contractors and subcontractors will be assessed at intervals consistent with the importance, complexity, quantity of the product or services, and performance history. Supplier performance and compliance with procurement documents are monitored by audit, source verification, receipt inspection, or a combination to ensure continued acceptable supplier performance. [7.2.5]* • *Documentary evidence that material and equipment conform to the procurement requirements shall be available before installation and use…The documentary evidence shall be retained in accordance with applicable regulatory requirements and shall*

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	be sufficient to identify the specific requirements, such as codes, standards, or specifications, met by the purchased material and equipment." [7.4]
k. Measures for the resolution of disputes involving quality arising from a difference of opinion between QA/Quality Control (QC) personnel and personnel from other departments (engineering, procurement, manufacturing, etc.).	The following excerpt from the "Responsibilities" sub-section of DQAP Section 1 addresses these requirements: *"The GM is responsible for apprising management of the effectiveness of the DQAP implementation and is the arbitrator for non-conformances of unusual complexity." [1.2.4]* The following excerpt from Section 2 also addresses these requirements: *"Disputes arising between departments or organizations on QA matters that cannot be resolved at a lower level of management will be referred to the GM." [2.1.6]*
l. Measures for indoctrination, training, and qualification programs that fulfill the following criteria:	The following excerpt from DQAP Appendix D, Section 3.1 applies to the Personnel responsible for performing activities affecting quality: *"Facility staff responsible for the safe storage of nuclear fuel and selected decommissioning activities shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as defined in approved procedures."* In addition, sub-section "Personnel Training and Qualifications" in DQAP Section 2 requires the following: • *"Individual managers are responsible for ensuring that personnel working under their cognizance are provided with the necessary indoctrination training and resources to accomplish assigned activities which fall under the scope of the DQAP. [2.2.1]* • *Members of the KS staff (including audit and inspection personnel) shall have the appropriate qualifications necessary to perform their assigned duties defined in implementing procedures. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, Appendix D of the DQAP cites references that stipulate the use of specific industry standards addressing qualifications. Training programs are established and*
• Personnel responsible for performing activities affecting quality should be instructed as to the purpose, scope, and implementation of the quality-related manuals, instructions, and procedures.	
• Personnel performing activities affecting quality should be trained and qualified in the principles and techniques of the activities being performed.	
• Maintenance of the proficiency of personnel performing quality-affecting activities by retraining, reexamining, and re-certifying.	
• Preparation and maintenance of documentation of completed training and qualification.	
• Qualification of personnel in accordance with accepted codes and standards.	

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	implemented to ensure that personnel achieve and maintain suitable proficiency. Personnel training and qualification records are maintained in accordance with approved procedures." [2.2.2]
14.5.3 Design Control The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to carry out design activities in a planned, controlled, and orderly manner.	The following excerpt from DQAP Section 3 addresses the requirement: *"The program will ensure that the activities associated with the design of important to safety SSCs and modifications thereto, are executed in a planned, controlled, and orderly manner." [3.1.1]*
b. Measures to correctly translate the applicable regulatory requirements and design bases into specifications, drawings, written procedures, and instructions.	The following excerpt from DQAP Section 3 addresses the requirement: *"Design inputs (e.g., performance, conditions of the facility license, quality standards identified in Appendix C of the DQAP, and quality verification requirements) shall be identified and correctly translated into design outputs (e.g., specifications, drawings, procedures, and instructions). [3.1.5]*
c. Measures to describe how the applicant will specify quality standards in the design documents and control deviations and changes from these quality standards.	The following excerpts from DQAP Section 3 addresses the requirements: • *"The program will ensure that the activities associated with the design of important to safety SSCs and modifications thereto, are executed in a planned, controlled, and orderly manner. [3.1.1]* • *The program utilizes the guidance of NUREG/CR 6407, "Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety", to classify SSCs such that appropriate quality requirements are identified and documented on drawings, component lists, or procurement documents, as applicable. [3.1.3]*

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	• *The final design output shall relate to the design input in sufficient detail to permit verification. Design outputs shall specify design characteristics that can be controlled, inspected, and tested. Inspection and test criteria are identified. [3.1.6]* • *Changes to final designs (including field changes and modifications) and dispositions of nonconforming items to either use-as-is or repair shall be subjected to design control measures commensurate with those applied to the original design and approved by the organization that performed the original design or a qualified designee." [3.1.8]*
d. Measures to describe how the applicant will review designs to ensure that design characteristics can be controlled, inspected, and tested and that inspection and test criteria are identified.	The following excerpt from DQAP Section 3 addresses the requirement: *"The final design output shall relate to the design input in sufficient detail to permit verification. Design outputs shall specify design characteristics that can be controlled, inspected, and tested. Inspection and test criteria are identified." [3.1.6]* Additionally, the "Design Verification" subsection of DQAP Section 3 states: • *"The program will verify the acceptability of design activities and documents for the design of items. The selection and incorporation of design inputs and processes, outputs and changes are verified ... [3.2.1]* • *Design verification procedures are to be established and implemented to ensure that an appropriate verification method is used, the appropriate design parameters to be verified are chosen, the acceptance criteria is identified, the verification is satisfactorily accomplished and the results are properly recorded." [3.2.6]*
e. Measures to describe how the applicant will establish both internal and external design interface controls. These controls should include review, approval, release, distribution, and revision of documents involving design interfaces with participating design organizations.	The following excerpt from DQAP Section 3 addresses the requirement: *"Interface controls (internal and external between participating design organizations and across technical disciplines) for the purpose of developing, reviewing, approving, releasing,*

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	distributing, and revising design inputs and outputs shall be defined in procedures." [3.1.9]
f. Measures to describe how they will properly select and perform design verification processes such as design reviews, alternative calculations, or qualification testing. When a test program is to be used to verify the adequacy of a design, the measures should be developed to describe how they will use a qualification test of a prototype unit under adverse design conditions.	The following excerpts from the "Design Verification sub-section of DQAP Section 3 addresses the requirements: • *Verification methods include, but are not limited to, design reviews, alternative calculations, and qualification testing. The extent of this verification will be a function of the importance to safety of the item, the complexity of the design, the degree of standardization, the state of the art, and the similarity with previously proven designs. [3.2.2]* • *When a test program is used to verify the acceptability of a specific design feature, the test program will demonstrate acceptable performance under conditions that simulate the most adverse design conditions that are expected to be encountered." [3.2.3]*
g. Design verification constitutes confirmation that the design of the SSC is suitable for its intended purpose. Measures to ensure design verifications are completed by an individual with a level of skill at least equal to that of the original designer, recognizing design checking can be performed by a less experienced person. (As an example, design checking, which should also be performed, includes confirmation of the numerical accuracy of computations and the accuracy of data input to computer codes. Confirmation that the correct computer code has been used is part of design verification.) Measures to describe how design verification will be performed by persons other than those performing design checking. In addition, measures to include how individuals or groups responsible for design verification will not include the original designer and normally not include the designer's immediate supervisor.	The following excerpts from the "Design Verification sub-section of DQAP Section 3 address the requirements: *"Individuals or groups responsible for design reviews or other verification activities shall be identified in procedures and their authority and responsibility shall be defined and controlled. Design verification shall be performed by any competent individuals or groups other than those who performed the original design, but who may be from the same organization. At least one individual shall have a level of skill at least equal to that of the original designer. The designer's immediate supervisor or manager may perform the design verification and controls for this are defined in approved procedures." [3.2.5]* *Design verification procedures are to be established and implemented to ensure that an appropriate verification method is used, the appropriate design parameters to be verified are chosen, the acceptance criteria is identified, the verification is satisfactorily accomplished and the results are properly recorded." [3.2.6]*

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h. Measures to ensure design and specification changes are subject to the same design controls and the same or equivalent approvals that were applicable to the original design.	The following excerpt from DQAP Section 3 addresses the requirement: *"Changes to final designs (including field changes and modifications) and dispositions of nonconforming items to either use-as-is or repair shall be subjected to design control measures commensurate with those applied to the original design and approved by the organization that performed the original design or a qualified designee."* [3.1.8]
i. Measures to ensure the documentation of all errors and deficiencies in the design or the design process that could adversely affect SSCs important to safety. In addition, the applicant should provide measures for adequate corrective action, including root cause evaluation of significant errors and deficiencies, to preclude repetition.	The following excerpt from DQAP Section 3 addresses the requirement: *"Errors and deficiencies in the design or the design process that could adversely affect SSCs important to safety shall be entered into the corrective action process." [3.1.10]* The contents of DQAP Section 16 meet the requirements of the second sentence.
j. Before selecting materials, parts, and equipment that are standard, commercial (off-the-shelf), or have been previously approved for a different application, measures should be provided to review the suitability of any materials, parts, and equipment for the intended application.	The following excerpt from DQAP Section 3 addresses the requirement: *"The design process shall ensure that materials, parts, equipment and processes are selected and independently verified consistent with their importance to safety to ensure they are suitable for their intended application." [3.1.7]*
k. Measures to provide written procedures to identify and control the authority and responsibilities of all individuals or groups responsible for design reviews and other design verification activities.	The following excerpts from DQAP Section 3 addresses the requirements: • *"The program will ensure that the activities associated with the design of important to safety SSCs and modifications thereto, are executed in a planned, controlled, and orderly manner. [3.1.1]* • *Individuals or groups responsible for design reviews or other verification activities shall be identified in procedures and their authority and responsibility shall be defined and controlled." [3.2.5]*

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l. Measures that include the use of valid industry standards and specifications for the selection of suitable materials, parts, equipment, and processes for SSCs that are important to safety.	The following excerpt from DQAP Section 3 address the requirement: *"Design inputs (e.g., performance, conditions of the facility license, design bases, regulatory requirements, quality standards identified in Appendix C of the DQAP, and quality verification requirements) shall be identified and correctly translated into design outputs (e.g., specifications, drawings, procedures, and instructions)." [3.1.5]*
14.5.4 Procurement Document Control The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to establish procedures that clearly delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of procurement documents.	The following excerpt from DQAP Section 4 addresses the requirement: *"The program includes provisions that clearly delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of procurement documents." [4.6]*
b. Measures to ensure that qualified personnel review and concur with the adequacy of quality requirements stated in procurement documents. These measures should also ensure that the quality requirements are correctly stated, inspectible, and controllable; there are adequate acceptance and rejection criteria; and the procurement document has been prepared, reviewed, and approved in accordance with QA program requirements.	The following excerpts from DQAP Section 4 address the requirement: • *"Procurement documents shall be reviewed and approved by QA for the adequacy of quality requirements, and to ensure that the quality requirements are correctly stated, inspectable, and controllable; and there are adequate acceptance and rejection criteria. [4.6.1]* • *Qualified personnel shall ensure the procurement document has been prepared, reviewed, and approved in accordance with QA program requirements" [4.6.2]*
c. Measures to document the review and approval of procurement documents before they are released, and the documentation should be available for verification.	The following excerpt from DQAP Section 4 addresses the requirement: *"The program includes provisions that clearly delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of procurement documents." [4.6]* The following excerpt from DQAP Section 17 addresses the requirement: *"The program will ensure that sufficient records of*

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	important to safety items and activities affecting quality (e.g., ..., procurement, ...) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents. Records shall be identified and retrievable." [17.1]
d. Procurement documents should identify the applicable QA requirements that should be compiled and described in the supplier's QA program. In addition, the applicant should review and concur with the supplier's QA program.	The following excerpts from DQAP Section 4 addresses the requirements: • *"The program includes provisions for evaluating prospective suppliers and ensuring that selected suppliers continue to provide acceptable products and services. [4.2]* • *Procurement documents shall be reviewed and approved by QA for the adequacy of quality requirements, and to ensure that the quality requirements are correctly stated, inspectable, and controllable; and there are adequate acceptance and rejection criteria. [4.6.1]* • *Qualified personnel shall ensure the procurement document has been prepared, reviewed, and approved in accordance with program requirements." [4.6.2]* Additional detail regarding supplier qualification are included in Section 7 and Section 18 of the DQAP.
e. Measures to ensure procurement documents contain or reference the regulatory requirements, design bases, and other technical requirements.	The following excerpt from DQAP Section 4 addresses the requirement: *"The program includes provisions for invoking applicable technical, regulatory, administrative, and reporting requirements (e.g., specification, codes, standards, tests, inspections, special processes, records, certifications, 10 CFR 21) applicable to the procurement to be specified in procurements documents." [4.5]*
f. Measures to ensure procurement documents identify the documentation (e.g., drawings, specifications, procedures, inspection and fabrication plans, inspection and test records, personnel and procedure qualifications, and chemical and physical test results of material) to be prepared, maintained, and submitted to the purchaser for review and approval.	The following excerpts from DQAP Section 4 address the requirement: • *"The program includes provisions for invoking applicable technical, regulatory, administrative, and reporting requirements (e.g., specification, codes, standards, tests, inspections, special*

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	processes, records, certifications, 10 CFR 21) applicable to the procurement to be specified in procurements documents." [4.5] • *Procurement documents shall be reviewed and approved by QA for the adequacy of quality requirements, and to ensure that the quality requirements are correctly stated, inspectable, and controllable; and there are adequate acceptance and rejection criteria."* [4.6.1]
g. Measures to ensure procurement documents identify records to be retained, controlled, and maintained by the supplier and those records to be delivered to the purchaser before use or installation of the hardware.	The following excerpt from DQAP Section 4 addresses the requirement: *"The program includes provisions for ensuring that documented evidence of an item's conformance to procurement requirements is available at the site before the item is placed in service or used unless otherwise specified in procedures. Procurement documents shall identify records to be retained, controlled, and maintained by the supplier and those records to be delivered to the purchaser before use or installation of the hardware." [4.7]*
h. Measures to ensure procurement documents specify the procuring agency's right of access to the supplier's facilities and records for source inspection and audit.	The following excerpt from DQAP Section 4 addresses the requirement: *"The program includes provisions for source verification (inspection, audit, etc.) for accepting purchased items and services identified as important to safety when determined necessary." [4.4]*
i. Measures to ensure that changes and revisions to procurement documents are subject to the same or equivalent review and approval as the original documents.	The following excerpt from DQAP Section 4 addresses the requirement: *"Changes and revisions to procurement documents are subject to the same or equivalent review and approval as the original documents." [4.6.3]*
<u>14.5.5 Instructions, Procedures, and Drawings</u> The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to ensure activities affecting quality are prescribed and accomplished in accordance with documented instructions, procedures, or drawings.	The following excerpt from DQAP Section 5 addresses the requirement: *"The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings." [5.1]*

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b. Measures to establish provisions that clearly delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of instructions, procedures, and drawings.	The following excerpt from DQAP Section 5 addresses the requirement: *"The program will ensure that the sequence of actions to be accomplished in the preparation, review, approval, and control of instructions, procedures, and drawings are clearly delineated." [5.2]*
c. Measures to ensure instructions, procedures, and drawings specify the methods for complying with each of the applicable QA criteria.	The following excerpts from DQAP Sections 2, 3 and 5 address the requirement: • *"Each organization is responsible for ensuring that the applicable portions of the DQAP are properly documented, approved, and implemented (with trained staff, necessary materials, and approved procedures available) before an activity within the scope of the DQAP is executed.* [2.1.3] • *Important to safety activities shall be accomplished under suitably controlled conditions. Controlled conditions include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, such as adequate cleanliness; and assurance that all prerequisites for the given activity have been satisfied. The program takes into account the need for special controls, processes, test equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection and test.* [2.1.4] • *Design inputs (e.g., performance, conditions of the facility license, design bases, regulatory requirements, quality standards identified in Appendix C of the DQAP, and quality verification requirements) shall be identified and correctly translated into design outputs (e.g., specifications, drawings, procedures, and instructions).* [3.1.5] • *The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings.* [5.1]

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	• *QA review and concurrence of instructions, procedures, drawings, and specifications related to inspection, tests, calibrations, and special processes shall be performed prior to implementation to verify adequate quantitative and qualitative criteria have been specified." [5.2]*
d. Measures to ensure instructions, procedures, and drawings include quantitative acceptance criteria (such as dimensions, tolerances, and operating limits) as well as qualitative acceptance criteria (such as workmanship samples) as verification that activities important to safety have been satisfactorily accomplished.	The following excerpt from DQAP Section 5 addresses the requirement: *"These instructions, procedures, and drawings include, as appropriate, quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished." [5.3]*
e. Measures to ensure the QA organization reviews and concurs with the procedures, drawings, and specifications related to inspection plans, tests, calibrations, and special processes as well as any subsequent changes to these documents.	The following excerpts from DQAP Section 5 address the requirement: • *"QA review and concurrence of instructions, procedures, drawings, and specifications related to inspection, tests, calibrations, and special processes shall be performed prior to implementation to verify adequate quantitative and qualitative criteria have been specified. [5.2]* • *Changes or deviations from established instructions, procedures, or drawings for SSCs and other quality activities that have current important to safety functions, require the same review and approval as the original document." [5.4]*
<u>14.5.6 Document Control</u> The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. The QAPD should identify all documents to be controlled under this subsection. As a minimum, this should include design specifications; design and fabrication drawings; procurement documents; QA manuals; design criteria documents; fabrication, inspection, and testing instructions; and test procedures.	The following excerpt from DQAP Section 6 addresses the requirement: *"The scope of the document control program includes, but is not limited to: Safety Analysis Report(s); NRC License Documents, including Technical Specifications; Design Documents and Drawings; Procurement Documents; Procedures, Manuals, Plans, Directives, Policies, Instructions, etc., and; Other documents as defined in procedures." [6.3, 6.3 A-D]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
b. Measures to ensure establishment of procedures to control the review, approval, and issuance of documents and changes thereto before release to ensure that the documents are adequate and applicable quality requirements are stated.	The following excerpt from DQAP Section 6 addresses the requirement: *"The program will ensure that the review, approval, and issuance of documents and changes thereto before release by the appropriate organizations to ensure that the documents are adequate and applicable quality requirements are stated." [6.2]*
c. Measures to ensure establishment of provisions to identify individuals or groups responsible for reviewing, approving, and issuing documents and revisions thereto.	The following excerpt from DQAP Section 6 addresses the requirement: *"The program will ensure that the review, approval, and issuance of documents and changes thereto before release by the appropriate organizations to ensure that the documents are adequate and applicable quality requirements are stated." [6.2]*
d. Measures to ensure document revisions receive review and approval by the same organizations that performed the original review and approval or by other qualified responsible organizations designated by the applicant.	The following excerpts from DQAP Section 6 addresses the requirements: *"Revisions of controlled documents are reviewed for adequacy and approved for release by the same organization that originally reviewed and approved the documents or by a designated organization that is qualified and knowledgeable." [6.4]*
e. Measures to ensure that approved changes be included in instructions, procedures, drawings, and other documents before the change is implemented.	The following excerpt from DQAP Section 6 addresses the requirement: *"The program will ensure that the review, approval, and issuance of documents and changes thereto before release by the appropriate organizations to ensure that the documents are adequate and applicable quality requirements are stated." [6.2]*
f. Measures to ensure the control of obsolete or superseded documents to prevent inadvertent use.	The following excerpt from DQAP Section 6 addresses the requirement: "*The distribution of new and revised controlled documents is in accordance with procedures. Superseded documents are controlled to prevent inadvertent use." [6.6]*
g. Measures to ensure documents are available at the location where the activity is performed.	The following excerpt from DQAP Section 6 addresses the requirement: *"Copies of controlled documents are distributed to and used by the person performing the activity." [6.5]*
h. Measures to ensure establishment of a master list (or equivalent) to identify the current revision number of instructions, procedures, specifications, drawings, and procurement documents. In addition, measures to ensure updating of the list and distribution of it to predetermined, responsible personnel to preclude use of superseded documents.	The following excerpt from DQAP Section 6 addresses the requirement: *"The distribution of new and revised controlled documents is in accordance with procedures. Superseded documents are controlled to prevent inadvertent use." [6.6]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	Note that an administrative device like that described in the criteria is included in the administrative procedures controlling the distribution of new and revised controlled documents.
14.5.7 Control of Purchased Material, Equipment, and Services The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to ensure qualified personnel evaluate the supplier's capability to provide services and products of acceptable quality before the award of the procurement order or contract. In addition, measures to ensure QA and engineering groups participate in the evaluation of those suppliers providing critical items and services important to safety, and the applicant should define the responsibilities for each group's participation.	The following excerpts from DQAP Sections 7 and 18 address the requirements: • *"Procedures shall describe each organization's responsibilities for the control of purchased material, equipment, and services including the interfaces between all affected organizations. [7.1]* • *Supplier evaluation and selection may be accomplished by direct audit of the supplier, in-process surveillance of the supplier's documented program, or by review of audit history performed by EnergySolutions or an approved third-party source. Verification that a supplier can meet the specified technical and quality requirements shall be documented. KS maintains an Approved Suppliers List (ASL) of evaluated suppliers. [7.2.1]* • *External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not greater than three (3) years with a 90 day grace period." [7.2.1.A] Note that Section 7.2.1.B contains additional grace period associated with extenuating circumstances.* • *"General administrative controls for conduct of audit, surveillance, in-process inspection, receipt inspection are provided for in Sections 10 and 18 of the DQAP. [7.5]* • *QA internal and supplier audits are planned and performed by qualified auditors utilizing approved written procedures and/or checklists.* [18.1]

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	• *Lead Auditors shall have experience, training or qualifications commensurate with the scope and complexity of their audit responsibility.* [18.2] • *Scheduling, preparation, personnel selection, performance, reporting, response, follow-up, and records management for audits are performed in accordance with written procedures."* [18.3] Note that engineering and QA roles and responsibilities are bounded by the above.
b. Measures to ensure evaluation of suppliers on the basis of one or more of the following criteria: • The supplier's capability to comply with the elements of the QA criteria that are applicable to the type of material, equipment, or service being procured. • Review of previous records and performance of suppliers who have provided similar articles or services of the type being procured. • A survey of the supplier's facilities and QA program to assess the capability to supply a product that meets applicable design, manufacturing, and quality requirements.	The following excerpts from DQAP Section 7 address the requirements: • *"The program will ensure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents as applicable to DQAP scope. The program includes provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery."* [7.2] • *Supplier evaluation and selection may be accomplished by direct audit of the supplier, in-process surveillance of the supplier's documented program, or by review of audit history performed by EnergySolutions or an approved third-party source. Verification that a supplier can meet the specified technical and quality requirements shall be documented. [7.2.1]* • *External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not greater than three (3) years with a 90 day grace period." [7.2.1.A] Note that*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	Section 7.2.1.B contains additional grace period associated with extenuating circumstances. • *General administrative controls for conduct of audit, surveillance, in-process inspection, receipt inspection are provided for in Sections 10 and 18 of the DQAP." [7.5]* The requirements of Section 18 include use of the QA audit procedure for supplier evaluation. The audit process includes elements from the 1st and 3rd bullet of the requirements.
c. Measures to ensure documentation and filing of the results of supplier evaluations.	The following excerpt from DQAP Section 17 addresses the requirement: "*The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., ... procurement, ... inspection and test, ... and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents. Records shall be identified and retrievable." [17.1]* Documentation and filing of supplier evaluations, including supplier audits, are described in implementing procedures.
d. Measures to ensure planning and performing adequate surveillance of suppliers during fabrication, inspection, testing, and shipment of materials, equipment, and components in accordance with written procedures to ensure conformance to the purchase order requirements. In addition the measures should ensure that the procedures provide the following information:	The following excerpts from DQAP Section 7 address the requirements: • *"The program will ensure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents as applicable to DQAP scope. The program includes provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery.* [7.2]
• Instructions that specify the characteristics or processes to be witnessed, inspected or verified, and accepted; the method of surveillance and the extent of documentation required; and those responsible for implementing these instructions.	
• Procedures for audits and surveillance to ensure that the supplier complies with the quality requirements (surveillance should be performed for SSCs for which verification of	• *Supplier evaluation and selection may be accomplished by direct audit of the supplier, in-process surveillance of the supplier's documented program, or by review of audit history performed by EnergySolutions or an approved third-party source. Verification*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
procurement requirements cannot be determined upon receipt).	*that a supplier can meet the specified technical and quality requirements shall be documented. [7.2.1]* • *External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not greater than three (3) years with a 90 day grace period." [7.2.1.A] Note that Section 7.2.1.B contains additional grace period associated with extenuating circumstances.* • *Source verification may be performed at the contractor or subcontractor source via planned surveillance or in-process inspection and documented when it is determined advantageous to monitor or observe an item or activity to verify conformance. [7.2.2]* • *General administrative controls for conduct of audit, surveillance, in-process inspection, receipt inspection are provided for in Sections 10 and 18 of the DQAP." [7.5]* The following excerpt from DQAP Section 18 in part addresses the first bullet: *"QA internal and supplier audits are planned and performed by qualified auditors utilizing approved written procedures and/or checklists." [18.1]* Details regarding the planning of supplier audits are included in implementing procedures.
e. Measures to ensure the supplier furnish the following records to the purchaser: • Documentation that identifies the purchased material or equipment and the specific procurement requirements (e.g., codes, standards, and specifications) met by the items. • Documentation that identifies any procurement requirements that have not been met and a description of any nonconformances designated "accept as is" or "repair."	The following excerpts from DQAP Sections 4, 7 and 15 address the requirements: • *"The program includes provisions for ensuring that documented evidence of an item's conformance to procurement requirements is available at the site before the item is placed in service or used unless otherwise specified in procedures.* [4.7] • *Controls shall include the review and acceptance of supplier documents by the appropriate organization, including*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	compliance to the technical and quality requirements specified in the procurement documents, as required. [7.1] • *Receiving inspection shall verify, by review of objective evidence, the material and equipment conform to the procurement documents, including applicable technical and quality requirements. [7.2.4]* • *Documentary evidence that material and equipment conform to the procurement requirements shall be available before installation and use, and items accepted and released should be identified as to their inspection status. The documentary evidence shall be retained in accordance with applicable regulatory requirements and shall be sufficient to identify the specific requirements, such as codes, standards, or specifications, met by the purchased material and equipment.* [7.4] • *Supplier nonconformance reports designated accept as is or repair for important to safety SSCs require KS review and approval." [15.6]* Detailed instructions included in implementing procedures bound the requirements, because of the requirements and controls contained in DQAP Section 4, in combination with the fact that verification of requirements established in procurement documents are part of the processes described in Sections 7, 10 and 18.
f. Measures to describe the proposed procedures for reviewing and accepting these documents and, as a minimum, to ensure that this review and acceptance will be undertaken by a responsible QA individual.	The following excerpts from DQAP Section 7 address the requirements: • *"Procedures shall describe each organization's responsibilities for the control of purchased material, equipment, and services including the interfaces between all affected organizations. Controls shall include the review and acceptance of supplier documents by the appropriate organization, including compliance to the technical and quality requirements specified in the procurement documents, as required. [7.1]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	• *The program will ensure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents as applicable to DQAP scope. The program includes provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery. [7.2]* • *Receiving inspection shall verify, by review of objective evidence, the material and equipment conform to the procurement documents, including applicable technical and quality requirements. [7.2.4]* • *General administrative controls for conduct of audit, surveillance, in-process inspection, receipt inspection are provided for in Sections 10 and 18 of the DQAP."* [7.5] Additionally, DQAP Section 15 states: "Supplier nonconformance reports designated accept as is or repair for important to safety SSCs require KS review and approval." [15.6] Implementing procedures for both receipt inspection and the nonconformance process effectively address QA's responsibility for verifying acceptability of the subject documents.
g. Measures to ensure the conduct (of) periodic audits, independent inspections, or tests to ensure the validity of the suppliers' certificates of conformance.	The following excerpts from DQAP Section 7 address the requirements: • *"Supplier evaluation and selection may be accomplished by direct audit of the supplier, in-process surveillance of the supplier's documented program, or by review of audit history performed by EnergySolutions or an approved third-party source. [7.2.1]* • *External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not greater than three (3) years with a 90 day grace period." [7.2.1.A] Note that*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	Section 7.2.1.B contains additional grace period associated with extenuating circumstances. • *Source verification may be performed at the contractor or subcontractor source via planned surveillance or in-process inspection and documented when it is determined advantageous to monitor or observe an item or activity to verify conformance. [7.2.2]* • *Receiving inspection shall verify, by review of objective evidence, the material and equipment conform to the procurement documents, including applicable technical and quality requirements. [7.2.4]* • *Effectiveness of the control of quality by contractors and subcontractors will be assessed at intervals consistent with the importance, complexity, quantity of the product or services, and performance history. Supplier performance and compliance with procurement documents are monitored by audit, source verification, receipt inspection, or a combination to ensure continued acceptable supplier performance. [7.2.5]* • *General administrative controls for conduct of audit, surveillance, in-process inspection, receipt inspection are provided for in Sections 10 and 18 of the DQAP."* [7.5] DQAP Section 10 states: *"The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with* instructions, procedures, and drawings for accomplishing the activity." [10.1]
h. Measures to ensure the performance of a receiving inspection of the supplier-furnished material, equipment, and services to ensure fulfillment of the following criteria: • The material, component, or equipment should be properly identified in a manner that corresponds with the identification on the purchasing and receiving documentation.	The following excerpt from DQAP Section 7 addresses the requirements, in part: • *Receiving inspection shall verify, by review of objective evidence, the material and equipment conform to the procurement documents, including applicable technical and quality*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
• Material, components, equipment, and acceptance records should be inspected and judged acceptable in accordance with predetermined inspection instructions before installation or use. • Inspection records or certificates of conformance attesting to the acceptance of material, components, and equipment should be available before installation or use. • Items accepted and released should be identified as to their inspection status before they are forwarded to a controlled storage area or released for installation or further work.	*requirements. [7.2.4]* • *Documentary evidence that material and equipment conform to the procurement requirements shall be available before installation and use, and items accepted and released should be identified as to their inspection status. [7.4]* • *General administrative controls for conduct of audit, surveillance, in-process inspection, receipt inspection are provided for in Sections 10 and 18 of the DQAP."* [7.5] Detailed instructions included in implementing procedures for inspection planning and execution bound the requirements. Additionally, DQAP Section 4 states: *"The program includes provisions for ensuring that documented evidence of an item's conformance to procurement requirements is available at the site before the item is placed in service or used unless otherwise specified in procedures. Procurement documents shall identify records to be retained, controlled, and maintained by the supplier and those records to be delivered to the purchaser before use or installation of the hardware. [4.7]* *The program includes provisions for ensuring that procurement, inspection, and test requirements have been satisfied before an item is placed in service or used unless otherwise specified in procedures." [4.8]*
i. Measures to assess the effectiveness of suppliers' quality controls at intervals consistent with the importance to safety, complexity, and quantity of the SSCs procured.	The following excerpts from DQAP Section 7 address the requirements: • *"Effectiveness of the control of quality by contractors and subcontractors will be assessed at intervals consistent with the importance, complexity, quantity of the product or services, and performance history. Supplier performance and compliance with procurement documents are monitored by audit, source verification, receipt inspection, or a combination to ensure continued acceptable supplier performance. [7.2.5]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	• *General administrative controls for conduct of audit, surveillance, in-process inspection, receipt inspection are provided for in Sections 10 and 18 of the DQAP."* [7.5]
14.5.8 Identification and Control of Materials, Parts, and Components The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to establish procedures to identify and control materials, parts, and components (including partially fabricated subassemblies).	The following excerpts from DQAP Section 8 address the requirement: • *"The program will identify and control important to safety items to prevent the use of incorrect or defective items. [8.1]* • *Identification of each item is maintained by heat number, part number, serial number, or other appropriate means, either on the item or on records traceable to the item, as required throughout fabrication , erection, installation, and use so that the item can be traced to its documentation. Traceability is maintained to an extent consistent with the item's importance to safety." [8.3]*
b. Measures to determine identification requirements during generation of specifications and design drawings.	The following excerpt from DQAP Section 3 addresses the requirement: • *"Design inputs (e.g., performance, conditions of the facility license, design bases, regulatory requirements, quality standards identified in Appendix C of the DQAP, and quality verification requirements) shall be identified and correctly translated into design outputs (e.g., specifications, drawings, procedures, and instructions).* [3.1.5] • *The final design output shall relate to the design input in sufficient detail to permit verification. Design outputs shall specify design characteristics that can be controlled, inspected, and tested. Inspection and test criteria are identified.* [3.1.6] • *Design verification procedures are to be established and implemented to ensure that an appropriate verification method*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	is used, the appropriate design parameters to be verified are chosen, the acceptance criteria is identified, the verification is satisfactorily accomplished and the results are properly recorded." [3.2.6]
c. Measures to ensure that identification will be maintained either on the item or on records traceable to the item to preclude use of incorrect or defective items.	The following excerpt from DQAP Section 8 addresses the requirements: "*Identification of each item is maintained by heat number, part number, serial number, or other appropriate means, either on the item or on records traceable to the item, as required throughout fabrication , erection, installation, and use so that the item can be traced to its documentation. Traceability is maintained to an extent consistent with the item's importance to safety." [8.3]* Detailed instructions included in implementing procedures establish various means for establishing and maintaining traceability.
d. Measures to ensure Identification of materials and parts of important-to-safety items are traceable to the appropriate documentation (such as drawings, specifications, purchase orders, manufacturing and inspection documents, deviation reports, and physical and chemical mill test reports).	The following excerpt from DQAP Section 8 addresses the requirements: "*Identification of each item is maintained by heat number, part number, serial number, or other appropriate means, either on the item or on records traceable to the item, as required throughout fabrication , erection, installation, and use so that the item can be traced to its documentation. Traceability is maintained to an extent consistent with the item's importance to safety." [8.3]*
e. Measures to ensure the location and method of identification do not affect the fit, function, or quality of the item being identified.	The following excerpt from DQAP Section 8 addresses the requirements: "*The location and method of identification shall not affect the fit, function, or quality of the item being identified." [8.3]*
f. Measures to verify and document the correct identification of all materials, parts, and components before releasing them for fabrication, assembly, shipping, and installation.	The following excerpts from DQAP Sections 7, 8 and 10 address the requirements: • *"Documentary evidence that material and equipment conform to the procurement requirements shall be available before installation and use, and items accepted and released should be identified as to their inspection status. [7.4]* • *Identification of each item is maintained by heat number, part number, serial number, or other appropriate means, either on the item or on records traceable to the item, as required*

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	throughout fabrication , erection, installation, and use so that the item can be traced to its documentation. Traceability is maintained to an extent consistent with the item's importance to safety. [8.3] • *The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with instructions, procedures, and drawings for accomplishing the activity. [10.1]* • *Provisions to ensure inspection planning is properly accomplished are to be established. Planning activities shall identify the characteristics and activities to be inspected, the inspection techniques, the acceptance criteria, and the organization responsible for performing the inspections."* [10.2] Detailed instructions included in implementing procedures for inspection planning and execution bound the requirements.
14.5.9 Control of Special Processes The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to establish procedures to control special processes (such as welding, heat treating, nondestructive testing, and cleaning) for which direct inspection is generally impossible or disadvantageous. In addition, the applicant should provide a listing of these special processes.	The following excerpt from DQAP Section 9 addresses the requirements: *"This program will ensure that special processes identified as important to safety are properly controlled. The criteria that establish which processes are special are described in procedures. The following are examples of special processes: Welding; Heat treating; NDE (Non-Destructive Examination); Chemical cleaning; and Unique fabricating or test processes which require in-process controls." [9.1 A-E]*
b. Measures to qualify procedures, equipment, and personnel connected with special processes in accordance with applicable codes, standards, and specifications.	The following excerpt from DQAP Section 9 addresses the requirements: *"Special processes are accomplished by qualified personnel, using appropriate equipment, and procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements." [9.2]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
c. Measures to ensure qualified personnel perform special processes in accordance with written process sheets (or the equivalent) with recorded evidence of verification.	The following excerpt from DQAP Section 9 addresses the requirements: *"Special processes are accomplished by qualified personnel, using appropriate equipment, and procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements." [9.2]* Execution of qualification of personnel connected with special processes conducted in accordance with applicable codes, standards, specifications, and criteria includes generating the appropriate documentation.
d. Measures to establish, file, and keep current qualification records of procedures, equipment, and personnel associated with special processes.	The following excerpt from DQAP Section 17 includes control of documents, including those associated with Special Processes: *"The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., ... manufacturing, construction, inspection and test, installation, ... maintenance, modification, decommissioning, ...) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents. Records shall be identified and retrievable." [17.1]* Documentation and filing of documents associated with Special Processes are described in implementing procedures.
14.5.10 Licensee Inspection The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to establish, document, and conduct an inspection program that effectively verifies conformance of quality-affecting activities with requirements in accordance with written, controlled procedures.	The following excerpt from DQAP Section 10 addresses the requirement: *"The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with instructions, procedures, and drawings for accomplishing the activity." [10.1]*
b. Measures to ensure inspection personnel are sufficiently independent from the individuals performing the activities being inspected.	The following excerpt from DQAP Section 10 addresses the requirement: *"Inspections are performed by qualified personnel other than those who performed or directly supervised the work inspected." [10.6]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
c. Measures to ensure inspection procedures, instructions, and check lists provide the following details: • Identification of characteristics and activities to be inspected. • Identification of the individuals or groups responsible for performing the inspection operation. • Acceptance and rejection criteria. • A description of the method of inspection. • Procedures for recording evidence of completing and verifying a manufacturing, inspection, or test operation. • Identification of the recording inspector or data recorder and the results of the inspection operation.	The following excerpt from DQAP Section 7 addresses the requirements, in part: • *"Procedures shall describe each organization's responsibilities for the control of purchased material, equipment, and services including the interfaces between all affected organizations. Controls shall include the review and acceptance of supplier documents by the appropriate organization, including compliance to the technical and quality requirements specified in the procurement documents, as required. [7.1]* • *The program includes provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the contractor or subcontractor source, and examination of products upon delivery." [7.2]* The following excerpts from DQAP Section 10 also address the requirements, in part: • *"The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with instructions, procedures, and drawings for accomplishing the activity. [10.1]* • *Provisions to ensure inspection planning is properly accomplished are to be established. Planning activities shall identify the characteristics and activities to be inspected, the inspection techniques, the acceptance criteria, and the organization responsible for performing the inspections.* [10.2] • *Inspection results are to be documented by the inspector and reviewed by qualified personnel. Inspection records shall include the following, as a minimum: Item inspected; Date of inspection; Inspector; Type of observation; Results or acceptability; and Description of nonconforming conditions, or reference to*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	applicable nonconformance or corrective action documents in cases where acceptance criteria was not met."[10.4, 10.4.1 through 10.4.6]
d. Measures to ensure the use of inspection procedures or instructions with the necessary drawings and specifications when performing inspection operations.	The following excerpt from DQAP Section 10 addresses the requirement: *"The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with instructions, procedures, and drawings for accomplishing the activity." [10.1]* Detailed instructions included in implementing procedures for inspection planning and execution bound the requirements.
e. Measures to qualify inspectors in accordance with applicable codes, standards, and company training programs and in addition keeping inspector's qualifications and certifications current.	The following excerpt from DQAP Section 2 addresses the requirement: *"Members of the KS staff (including audit and inspection personnel) shall have the appropriate qualifications necessary to perform their assigned duties defined in implementing procedures. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, Appendix D of the DQAP cites references that stipulate the use of specific industry standards addressing qualifications. Training programs are established and implemented to ensure that personnel achieve and maintain suitable proficiency. Personnel training and qualification records are maintained in accordance with approved procedures." [2.2.2]*
f. Measures to inspect modifications, repairs, and replacements in accordance with the original design and inspection requirements or acceptable alternatives.	The following excerpt from DQAP Section 10 addresses the requirement: • *"The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with instructions, procedures, and drawings for accomplishing the activity. [10.1]* • *Planning activities shall identify the characteristics and activities to be inspected, the inspection techniques, the acceptance criteria, and the organization responsible for performing the inspections." [10.2]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
g. Measures to establish provisions that identify mandatory inspection hold points for witnessing by a designated inspector.	The following excerpt from DQAP Section 10 addresses the requirement: *"Provisions to identify inspection hold points, beyond which work is not to proceed without the consent of the inspection organizations are to be defined." [10.3]*
h. Measures to identify the individuals or groups who will perform receiving and process verification inspections, and should demonstrate that these individuals or groups have sufficient independence and qualifications.	The following excerpts from DQAP Section 10 address the requirements: • *"Planning activities shall identify the characteristics and activities to be inspected, the inspection techniques, the acceptance criteria, and the organization responsible for performing the inspections. [10.2]* • *Inspections are performed by qualified personnel other than those who performed or directly supervised the work inspected." [10.6]*
i. Measures to establish provisions for indirect control by monitoring processing methods, equipment, and personnel if direct inspection is not possible.	The following excerpt from DQAP Section 10 addresses the requirement: *"Provisions shall be made for indirect control by monitoring processing methods, equipment, and personnel if direct inspection is not possible. Both inspection and process monitoring shall be provided when control is inadequate without both." [10.3]*
14.5.11 Test Control The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to establish, document, and conduct a test program to demonstrate that the item will perform satisfactorily in service in accordance with written, controlled procedures.	The following excerpts from DQAP Section 11 address the requirement: • "*The program will demonstrate that items will perform satisfactorily in service using approved test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The program includes, as appropriate, proof tests before installation, pre-operational tests, post-maintenance tests, post-modification tests, and operational tests." [11.1, 11.2]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	• *Test results are evaluated and documented to assure that test objectives and inspection requirements have been satisfied." [11.5]*
b. Measures to ensure written test procedures incorporate or reference the following information: • Requirements and acceptance limits contained in applicable design and procurement documents. • Instructions for performing the test. • Test prerequisites. • Mandatory inspection hold points. • Acceptance and rejection criteria. • Methods of documenting or recording test data results.	The following excerpts from DQAP Section 11 address the requirement: • *"The program will demonstrate that items will perform satisfactorily in service using approved test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.* [11.1] *A. Test procedures shall be developed which include: Instructions and prerequisites to perform the test; Use of proper test equipment; Acceptance and rejection criteria; Mandatory inspections, as required; and Methods of documenting or recording test data results." [11.3, 11.3.A-E]*
c. Measures to ensure a qualified, responsible individual or group document test results and evaluate their acceptability. When practicable, the measures should ensure testing of the SSC occurs under conditions that will be present during normal and anticipated off-normal operations.	The following excerpt from DQAP Section 2 addresses the requirement: *"Members of the KS staff (including audit and inspection personnel) shall have the appropriate qualifications necessary to perform their assigned duties defined in implementing procedures. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, Appendix D of the DQAP cites references that stipulate the use of specific industry standards addressing qualifications. Training programs are established and implemented to ensure that personnel achieve and maintain suitable proficiency."* [2.2.2] The following excerpts from DQAP Section 11 address the requirements: • *"When practicable, the measures should ensure testing of the SSC occurs under conditions that will be present during normal and anticipated off-normal operations. [11.4]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	• *Test results are evaluated and documented by qualified personnel to assure that test objectives and inspection requirements have been satisfied. [11.5]* • *Unacceptable test results shall be evaluated and documented for impact on safety and reportability." [11.6]*
14.5.12 Control of Measuring and Test Equipment The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to ensure documented procedures describe the calibration technique and frequency, maintenance, and control of all measuring and test equipment (instruments, tools, gauges, fixtures, reference and transfer standards, and nondestructive test equipment) that will be used in the measurement, inspection, and monitoring of SSCs that are important to safety.	The following excerpts from DQAP Section 12 address the requirements: • *"The program consisting of implementing procedures reviewed and approved by the appropriate organizations will control the calibration, maintenance, and use of measuring and test equipment (M&TE) consistent with activities important to safety to ensure accuracy. [12.1]* • *The types of equipment covered by the program (e.g., instruments, tools, gauges, and reference and transfer standards) and measures to document and maintain the status of all calibrated M&TE are defined in procedures. [12.3]* • *Measuring and test equipment is calibrated at specified intervals or immediately before use on the basis of the item's required accuracy, required calibration technique, intended use, frequency of use, stability characteristics, and other conditions affecting its performance." [12.4]*
b. Measures to ensure measuring and test equipment are identified and traceable to the calibration test data.	The following excerpt from DQAP Section 12 addresses the requirements: *"Measuring and test equipment is labeled, tagged, or otherwise controlled to indicate its calibration status and traceability to calibration test data." [12.5]*
c. Measures to ensure the use of labels, tags, or documents for measuring and test equipment to indicate the date of the next scheduled calibration and to provide traceability to calibration test data.	The following excerpt from DQAP Section 12 addresses the requirements: *"Measuring and test equipment is labeled, tagged, or otherwise controlled to indicate its calibration status and traceability to calibration test data." [12.5]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
d. Measures to calibrate measuring and test instruments at specified intervals on the basis of the required accuracy, precision, purpose, degree of usage, stability characteristics, and other conditions that could affect the accuracy of the measurements.	The following excerpt from DQAP Section 12 addresses the requirements: *"Measuring and test equipment is calibrated at specified intervals or immediately before use on the basis of the item's required accuracy, intended use, frequency of use, stability characteristics, and other conditions affecting its performance." [12.4]*
e. Measures to assess the validity of previous inspections when measuring and test equipment is found to be out of calibration. In addition, measures should also be provided to document the assessment and take control of the out of calibration equipment.	The following excerpt from DQAP Section 12 addresses the requirements: • *"The ... measures to document and maintain the status of all calibrated M&TE are defined in procedures." [12.3]* • *"Measuring and test equipment found damaged or out of calibration is tagged or segregated. The acceptability of items measured, inspected, or tested with a damaged or out-of-calibration device, shall be evaluated, dispositioned and documented" [12.6]*
f. Measures to document and maintain the complete status of all items under the calibration system.	The following excerpt from DQAP Section 12 addresses the requirements: *"The types of equipment covered by the program (e.g., instruments, tools, gauges, and reference and transfer standards) and measures to document and maintain the status of all calibrated M&TE are defined in procedures." [12.3]*
g. Measures to ensure reference and transfer standards are traceable to nationally recognized standards; where national standards do not exist, the applicant should establish provisions to document the basis for calibration.	The following excerpt from DQAP Section 12 addresses the requirements: *"Calibration reference standards shall be based on traceability to nationally recognized standards. Where national standards do not exist, measuring and test equipment is calibrated against standards that have an accuracy of at least four (4) times the required accuracy of the equipment being calibrated, or when this is not possible have an accuracy that ensures the equipment being calibrated will be within the required tolerance." [12.2]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
14.5.13 Handling, Storage, and Shipping Control The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to establish and accomplish special handling, preservation, storage, cleaning, packaging, and shipping requirements in accordance with predetermined work and inspection instructions. b. Measures to control the cleaning, handling, storage, packaging, shipping, and preservation of materials, components, and systems in accordance with design and specification requirements to preclude damage, loss, or deterioration by environmental conditions (such as temperature or humidity)	The following excerpts from DQAP Section 13 address the requirements: • *"The program will control the handling, storage, shipping, cleaning, and preserving of items to prevent damage or deterioration. [13.1.1]* • *Special protective measures (e.g., containers, shock absorbers, accelerometers, inert gas atmospheres, specific moisture content levels, and temperature levels, etc.) are specified and provided when required to prevent damage or deterioration. [13.1.2]* • *Specific procedures shall be developed and used for cleaning, handling, storage, packaging, shipping, and preserving items when required to prevent damage or deterioration. [13.1.3]* • *Items are marked and labeled during packaging, shipping, handling, and storage to identify, maintain, and preserve the item's integrity and identify the need for any special controls." [13.1.4]* • Section 13 of the DQAP provides additional requirements specific to the handling, storage and shipping of licensed storage and transportation packages. [13.2]
14.5.14 Inspection, Test, and Operating Status The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to know the inspection and test status of items throughout fabrication.	The following excerpt from DQAP Section 14 addresses the requirements: *"The program will ensure that required inspections and tests and the operating status of items important to safety is verified before release, fabrication, receipt, installation, test, and use, as applicable. Operating status is provided by the use of tags, markings, stamps, or other suitable means." [14.1]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
b. Measures to establish procedures to control the application and removal of inspection and welding stamps and operating status indicators (such as tags, markings, labels, and stamps).	The following excerpt from DQAP Section 5 addresses the requirement for establishing procedural controls: *"The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings." [5.1]* The following excerpt from DQAP Section 14 addresses the requirement for application and removal of the status indicators: *"The application and removal of inspection, test, and operating status indicators are controlled in accordance with procedures."* [14.3]
c. Measures to ensure procedures under the cognizance of the QA organization controls the bypassing of required inspections, tests, and other critical operations.	The following excerpt from DQAP Section 5 addresses the requirement: *"The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings." [5.1]* The controls for required inspections, tests, and other critical operations on important to safety SSCs require procedures to control these activities, and these procedures are subject to QA review. Additionally, DQAP Section 10 states: *"Provisions to identify inspection hold points, beyond which work is not to proceed without the consent of the inspection organizations are to be defined."* [10.3] The application of hold points with the application and removal of inspection, test, and operating status indicators described in 14 provide the respective controls.
d. Measures to specify the organization responsible for documenting the status of nonconforming, inoperative, or malfunctioning SSCs and identifying the item to prevent inadvertent use.	The following excerpts from DQAP Sections 10, 11, 14 and 15 addresses the requirement • *"Inspection results are to be documented by the inspector and reviewed by qualified personnel."* [10.4]

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	• *"Unacceptable inspection results shall be evaluated and resolved in accordance with procedures."* [10.5] • *"Test results are evaluated and documented by qualified personnel to assure that test objectives and inspection requirements have been satisfied."* [11.5] • *"Unacceptable test results shall be evaluated and documented for impact on safety and reportability."* [11.6] • *"The application and removal of inspection, test, and operating status indicators are controlled in accordance with procedures.* [14.3] • *The program will ensure that nonconforming important to safety materials, parts, components, associated services and activities are identified and controlled.* [15.1] • *Nonconforming items are properly controlled by approved procedures describing the identification, documentation, segregation requirements, disposition and approval authority, and notification to the affected organizations to prevent their inadvertent installation or use."* [15.2]
14.5.15 Nonconforming Materials, Parts, or Components The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to establish procedures to control the identification, documentation, tracking, segregation, review, disposition, and notification of affected organizations regarding nonconforming materials, parts, components, services, or activities.	The following excerpts from DQAP Section 15 address the requirements: • *"The program will ensure that nonconforming important to safety materials, parts, components, associated services and activities are identified and controlled. [15.1]* • *Nonconforming items are properly controlled by approved procedures describing the identification, documentation, segregation requirements, disposition and approval authority,*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	and notification to the affected organizations to prevent their inadvertent installation or use." [15.2]
b. Measures to provide for adequate documentation to identify nonconforming items and describe the nonconformance, its disposition, and the related inspection requirements. The measures should also provide for adequate documentation and include signature approval of the disposition.	The following excerpts from DQAP Section 15 address this requirement: • "*Management at all levels and each individual working at the facility is responsible for promptly identifying and reporting the identification of nonconforming materials, parts, and components."* [15.3] • *"Nonconforming items are properly controlled by approved procedures describing the identification, documentation, segregation requirements, disposition approval authority, and notification to the affected organizations to prevent their inadvertent installation or use. Nonconforming items are reviewed and either accepted, rejected, repaired, or reworked in accordance with approved procedures."* [15.2] • *"Verification of the acceptability of reworked or repaired materials, parts, and SSCs is by re-inspecting and retesting the item as originally inspected and tested, or by using a method that is at least equal to the original inspection and testing method."* [15.5] Required approval signatures of the disposition and its implementation are described in implementing procedures.
c. Measures to establish provisions to identify those individuals or groups with the responsibility and authority for the disposition and closeout of nonconformance.	The following excerpt from DQAP Section 5 addresses the requirement: *"The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings."* [5.1] The controls for the nonconformance process applied to important to safety SSCs require procedures to control these activities, and these procedures identify those individuals or groups with the responsibility and authority for the disposition and closeout of nonconformances.

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	Additionally, DQAP Section 3 states: *"Changes to final designs (including field changes and modifications) and dispositions of nonconforming items to either use-as-is or repair shall be subjected to design control measures commensurate with those applied to the original design and approved by the organization that performed the original design or a qualified designee." [3.1.8]*
d. Measures to ensure nonconforming items are segregated from acceptable items and identified as discrepant until properly dispositioned and closed out.	The following excerpt from DQAP Section 15 addresses the requirement: *"Nonconforming items are properly controlled by approved procedures describing the identification, documentation, segregation requirements, disposition and approval authority, and notification to the affected organizations to prevent their inadvertent installation or use." [15.2]*
e. Measures to verify the acceptability of reworked or repaired materials, parts, and SSCs by re-inspecting and retesting the item as originally inspected and tested or by using a method that is at least equal to the original inspection and testing method. In addition, the measures should provide for documentation of the relevant inspection, testing, rework, and repair procedures.	The following excerpts from DQAP Section 15 address the requirements: *"Verification of the acceptability of reworked or repaired materials, parts, and SSCs is by re-inspecting and retesting the item as originally inspected and tested, or by using a method that is at least equal to the original inspection and testing method." [15.5]* DQAP Section 17 states: "The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents." [17.1]
f. Measures to ensure nonconformance reports designated "accept as is" or "repair" are made part of the inspection records and forwarded with the hardware to the customer for review and assessment.	The following excerpt from DQAP Section 15 addresses the requirement: *"Supplier nonconformance reports designated accept as is or repair for important to safety SSCs require KS review and approval." [15.6]* DQAP Section 17 states: "The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing,

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents." [17.1]
g. Measures to periodically analyze nonconformance reports to show quality trends and help identify root causes of nonconformance. Significant results should be reported to responsible management for review and assessment	The following excerpts from the DQAP address the requirements: • From DQAP Section 15: *"Interfaces with the Corrective Action Program described in Section 16 will be established to ensure the prompt identification, documentation, and correction of nonconforming materials, parts, and components installed in SSCs. [15.4]* • *Nonconformance reports will be periodically evaluated for trends, provided sufficient quantity of data exists. Adverse trends will be entered into the Corrective Action Program."* [15.7] • From DQAP Section 16: *"Reports of conditions that are adverse to quality are analyzed to identify negative performance trends. Significant conditions adverse to quality and significant trends are reported to the appropriate levels of management." [16.6]*
14.5.16 Corrective Action The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to evaluate conditions adverse to quality (such as nonconformance, failures, malfunctions, deficiencies, deviations, and defective material and equipment) in accordance with established procedures to assess the need for corrective action.	The following excerpt from the DQAP Section 16 addresses the requirement: *"The program will ensure that conditions adverse to quality (such as nonconformance, failures, malfunctions, deficiencies, deviations, and defective material and equipment) are evaluated in accordance with established procedures to assess the need for corrective action to address the condition identified, and to preclude recurrence of the condition." [16.2]*
b. Measures to initiate corrective action to preclude recurrence of a condition identified as adverse to quality.	The following excerpt from the DQAP Section 16 addresses the requirement: *"The program will ensure that conditions adverse to quality (such as nonconformance, failures, malfunctions, deficiencies, deviations, and defective material and equipment) are evaluated in*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	accordance with established procedures to assess the need for corrective action to address the condition identified, and to preclude recurrence of the condition." [16.2]
c. Measures to conduct follow-up activities to verify proper implementation of corrective actions and close out the corrective action documentation in a timely manner.	The following excerpts from DQAP Section 16 address the requirements: • *(for conditions adverse to quality): "Follow-up activities to verify proper implementation of corrective actions and close out of the corrective action documentation in a timely manner shall be performed in accordance with established procedures. [16.2]* • *(for significant conditions adverse to quality): Follow-up action shall be taken to verify effective implementation of the required corrective actions to prevent recurrence and to verify that they are effectively implemented." [16.4]*
d. Measures to document significant conditions adverse to quality, as well as the root causes of the conditions, and the corrective actions taken to remedy the [condition] and preclude recurrence of the conditions. In addition, this information should be reported to cognizant levels of management for review and assessment.	The following excerpt from DQAP Section 16 addresses the requirement: *"Significant conditions adverse to quality shall require cause determination, corrective actions that should prevent recurrence, documentation and reporting to appropriate levels of management. Follow-up action shall be taken to verify effective implementation of the required corrective actions to prevent recurrence and to verify that they are effectively implemented." [16.4]*
<u>14.5.17 Quality Assurance Records</u> The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to define the scope of the records program such that sufficient records will be maintained to provide documentary evidence of the quality of items and activities affecting quality. To minimize the retention of unnecessary records, the records program should list records to be retained by "type of data" rather than by record title.	The following excerpt from DQAP Section 17 addresses the requirement: *"The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents." [17.1]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	The identification and control of specific records types associated with the records process are described in implementing procedures.
b. Measures to ensure that QA records include operating logs; results of reviews, inspections, tests, audits, and material analyses; monitoring of work performance; qualification of personnel, procedures, and equipment; and other documentation such as drawings, specifications, procurement documents, calibration procedures and reports, design review and peer review reports, nonconformance reports, and corrective action reports.	The following excerpt from DQAP Section 17 addresses the requirement: "*Controls for the administration, identification, receipt, storage, preservation, safekeeping, retrieval, and disposition of records are provided in procedures. Responsibilities for QA and other organizations for the identification of QA and other required records, and for implementation of activities related to the records, are provided in procedures." [17.2]* The identification and control of specific records types associated with the records process are described in implementing procedures.
c. Measures to ensure records are identified and retrievable.	The following excerpt from DQAP Section 17 addresses the requirement: *"Records shall be identified and retrievable." [17.1]*
d. Measures to ensure requirements and responsibilities for record creation, transmittal, retention (such as duration, location, fire protection, and assigned responsibilities), and maintenance subsequent to completion of work are consistent with applicable codes, standards, and procurement documents.	The following excerpt from DQAP Section 17 addresses the requirement: "*The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents." [17.1]* The requirements and responsibilities for record creation, transmittal, retention (such as duration, location, fire protection, and assigned responsibilities), and maintenance associated with the records process are described in implementing procedures.
e. Measures to ensure inspection and test records contain the following information, where applicable:	The following excerpts from DQAP Section 10 and 11 address inspection and test record content:
• A description of the type of observation.	• *"The program will ensure inspections of important to safety activities are planned, executed and documented in order to verify conformance with instructions, procedures, and drawings*
• The date and results of the inspection or test.	
• Information related to conditions adverse to quality.	
• Identification of the inspector or data recorder.	

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
• Evidence as to the acceptability of the results. • Action taken to resolve any noted discrepancies	*for accomplishing the activity.* [10.1] • *Provisions to ensure inspection planning is properly accomplished are to be established. Planning activities shall identify the characteristics and activities to be inspected, the inspection techniques, the acceptance criteria, and the organization responsible for performing the inspections.* [10.2] • *Inspection results are to be documented by the inspector and reviewed by qualified personnel.* [10.4] • *Unacceptable inspection results shall be evaluated and resolved in accordance with procedures.* [10.5] • *Test procedures shall be developed which include: Methods of documenting or recording test data results.* [11.3, 11.3.E] • *Test results are evaluated and documented by qualified personnel to assure that test objectives and inspection requirements have been satisfied.* [11.5] • *Unacceptable test results shall be evaluated and documented for impact on safety and reportability."* [11.6] Specific details for inspection and test records, such as type of observation, inspector or data recorder and date, are addressed in implementing procedures. The following excerpt from DQAP Section 17 addresses general requirements for all ITS records: *"The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents."* [17.1]

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
f. Measures to ensure record storage facilities are constructed, located, and secured to prevent destruction of the records by fire, flood, theft, and deterioration by environmental conditions (such as temperature or humidity). In addition, the facilities are to be maintained by, or under the control of, the licensee throughout the life of the DSS or the individual product.	The following excerpts from DQAP Section 17 describes the general requirements for the maintenance and preservation of records: • *"Controls for the administration, identification, receipt, storage, preservation, safekeeping, retrieval, and disposition of records are provided in procedures. Responsibilities for QA and other organizations for the identification of QA and other required records, and for implementation of activities related to the records, are provided in procedures."* [17.2] • *"Facilities used to store records should be constructed to minimize the risk from damage or destruction by severe natural conditions, such as wind, flood, fire, temperature, humidity, mold, or infestation by insects or rodents."* [17.2.1] • *"If dual storage facilities are used to ensure the record integrity, the storage facilities should be sufficiently remote from each other to preclude a single event (such as a fire or flood) from damaging both facilities."* [17.2.2] The following excerpt from DQAP Section 17 describes the QA records repository requirements for electronic records: *"Management of the electronic storage of records will utilize the guidance provided in the following industry standards as described in approved procedures: NIRMA TG11-2011, Authentication of Records and Media; NIRMA TG15-2011, Management of Electronic Records; NIRMA TG16-2017, Software Quality Assurance Documentation and Records; NIRMA TG21-2011, Required Records Protection, Disaster Recovery and Business Continuation" [17.3.1-4]* Previous revisions of these NIRMA guidelines have been endorsed by RIS 2000-18, Guidance on Managing Quality Assurance Records in Electronic Media, dated October 23, 2000.

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	Note that records retention requirements for KPS are modified by NRC records exemption. The following excerpt from DQAP Section 17 describes this: *"In an approval dated May 10, 2017 [ML17069A394], DEK was granted exemptions by the NRC to allow elimination of the requirement to maintain records that are no longer necessary due to the permanently defueled condition and decommissioning status of the KPS. The NRC granted DEK a partial exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, Criterion XVII; and 10 CFR 50.59(d)(3) for the KPS to advance the schedule to remove records associated with structures, systems, and components (SSCs) that have been or will be removed from NRC licensing basis documents by appropriate change mechanisms." [17.4]* This language is deemed acceptable based on the fact that this is from the current governing QA Program at Kewaunee (Dominion Energy "Nuclear Facility Quality Assurance Program Description" Topical Report DOM-QA-1, rev. 30, Page C-8).
14.5.18 Audits The following are examples of areas/items that may be addressed to support implementation of the quality criteria:	
a. Measures to perform audits in accordance with written procedures or checklists; qualified personnel tasked with performing these audits should not have direct responsibility for the achievement of quality in the areas being audited.	The following excerpts from DQAP Section 18 address the requirements: • *"QA internal and supplier audits are planned and performed by qualified auditors utilizing approved written procedures and/or checklists. [18.1]* • *Individuals performing audits shall not have direct responsibilities in the areas being audited." [18.2]*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
b. Measures to ensure audit results are documented and reviewed with management having responsibility in the area audited.	The following excerpts from DQAP Section 18 address the requirements: • *"The program will establish a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of DQAP scope activities." [18.1]* • *Results of audits are reviewed with the management of the organization audited." [18.8]*
c. Measures to establish provisions for responsible management to undertake appropriate corrective action as a follow-up to audit reports. In addition, the measures should ensure auditing organizations schedule and conduct appropriate follow-up to ensure that the corrective action is effectively accomplished.	The following excerpt from DQAP Section 18 addresses the requirements: *"Results of audits are reviewed with the management of the organization audited. Responsible management in the areas audited shall implement the necessary corrective actions required to address deficiencies. These actions are documented and reviewed periodically and, if needed, re-examined during re-audits of the subject area to verify deficient areas have completed corrective actions." [18.8]*
d. Measures to perform both technical and QA programmatic audits to achieve the following objectives: • Provide a comprehensive independent verification and evaluation of procedures and activities affecting quality. • Verify and evaluate suppliers' QA programs, procedures, and activities.	The following excerpts from DQAP Sections 7 and 18 address the requirements: • *"The program will establish a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of DQAP scope activities." [18.1]* • *Individuals performing audits shall not have direct responsibilities in the areas being audited. [18.2]* • *External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not greater than three (3) years with a 90 day grace period." [7.2.1.A]* These requirements bound the evaluation criteria.

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
e. Measures to ensure audits are led by appropriately qualified and certified audit personnel from the QA organization. The measures should also ensure that the audit team membership include personnel (not necessarily QA organization personnel) having technical expertise in the areas being audited.	The following excerpts from DQAP Section 18 address the requirements: • *"Lead Auditors shall have experience, training or qualifications commensurate with the scope and complexity of their audit responsibility. Individuals performing audits shall not have direct responsibilities in the areas being audited." [18.2]* • *"Scheduling, preparation, personnel selection, performance, reporting, response, follow-up, and records management for audits are performed in accordance with written procedures."* [18.3] Additional detail regarding audit team composition and use of technical specialists associated with the audit process are described in implementing procedures.
f. Measures to schedule regular audits on the basis of the status and importance to safety of the activities being audited. The measures should also address that audits be initiated early enough to ensure effective QA during design, procurement, and contracting activities.	The following excerpt from DQAP Section 18 addresses the requirements: *"Scheduling, preparation, personnel selection, performance, reporting, response, follow-up, and records management for audits are performed in accordance with written procedures. Audit scopes and schedules are based upon the status of work progress, important to safety activities being performed, and regulatory requirements." [18.3]* Additional detail regarding schedule and timing of audit activities associated with the audit process are described in implementing procedures. With respect to the periodicity of audits, note the following language is included in DQAP Section 18: *"Planned internal audits are scheduled and performed in accordance with approved procedures or checklists to provide comprehensive, independent verification, and evaluation of DQAP compliance, performance criteria, and program effectiveness. Important to Safety (10 CFR 71 and 72) activities shall be audited based on the activity's importance to safety; however, each applicable quality criterion shall be audited at least once each year. Audit of DQAP elements applicable to other activities*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	conducted under the DQAP shall be completed for each functional area within a period of 2 years. Audits may be extended beyond their originally scheduled due date based on the following criteria: Audits shall be performed at the intervals designated and the schedules are based on the month in which the audit starts; A maximum extension not to exceed 25 percent of the audit interval is allowed unless restricted by regulation. When an audit interval extension greater than one month is used, the next audit from that particular area is scheduled from the original anniversary month rather than from the month of the extended audit." [18.4, 18.4.A through 18.4.C] With respect to the periodicity of external audits, note the following language is included in DQAP Section 7: • *"External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not greater than three (3) years with a 90 day grace period." [7.2.1.A] Note that Section 7.2.1.B contains additional grace period associated with extenuating circumstances.* This language is deemed acceptable based on the fact the additional grace period for external audits for extenuating circumstances was approved by the NRC with an SER in response to a request from Callaway station (Ref. SER dated August 6, 2020, ADAMS Accession No. ML20216A681).
g. Measures to analyze and trend audit deficiency data as well as ensuring resultant reports, indicating quality trends and the effectiveness of the QA program, should be given to management for review, assessment, corrective action, and follow-up.	The following excerpt from DQAP Section 18 addresses the requirements, in requiring issues to be entered into the corrective action process: *"Results of audits are reviewed with the management of the organization audited. Responsible management in the areas audited shall implement the necessary corrective actions required to address deficiencies. These actions are documented and reviewed periodically and, if needed, re-examined during re-audits of*

NUREG 1536, Section 14, Acceptance Criteria	KS DQAP References
	the subject area to verify deficient areas have completed corrective actions." [18.8] The audit process requires issues to be entered into the corrective action process. Additional detail regarding the analysis and trending of audit deficiency is included within Section 16 of the DQAP, and the associated implementing procedures.
h. Measures to ensure that audits objectively assess the effectiveness and proper implementation of the QA program and should address the technical adequacy of the activities being conducted.	The following excerpts from DQAP Section 18 address the requirements: • *"The program will establish a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of DQAP scope activities. [18.1]* • *Planned internal audits are scheduled and performed in accordance with approved procedures or checklists to provide comprehensive, independent verification, and evaluation of DQAP compliance, performance criteria, and program effectiveness."[18.4]* Additional detail regarding the scope and breadth of audit activities are included in the associated implementing procedures.
i. Measures to establish provisions requiring the performance of audits in all areas to which the requirements of the QA program apply.	The following excerpt from DQAP Section 18 addresses the requirement: *"The program will establish a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of DQAP scope activities." [18.1]* Additional detail regarding the scope and breadth of audit activities are included in the associated implementing procedures.

ATTACHMENT 4

KS DQAP Compliance Matrix to NUREG 1757

27 PAGES

KEWAUNEE POWER STATION

NUREG 1757, Section 17.6, Acceptance Criteria	KS DQAP References / Conclusion
17.6.1: ORGANIZATION EVALUATION CRITERIA: The staff's review should verify that the following information is included in the description of the QA program organization:	
• a description of the QA program management organization;	The "Quality Assurance" sub-section of DQAP Section 1 addresses this requirement.
• a description of the duties and responsibilities of each unit within the organization and how delegation of responsibilities is managed within the decommissioning program;	The DQAP Section 1 addresses the duties and responsibilities of each unit within the organization. Specific requirements for delegation are included in the following sections of the DQAP: • Section 1 of the DQAP states: "*Unless otherwise specifically prohibited, responsibilities of managers as described in the DQAP may be delegated to, and performed by, other qualified individuals.*" *[1.1.1]* • For the General Manager (GM), the "Responsibilities" sub-section of DQAP Section 1 states "*The individual shall delegate in writing the succession to this responsibility during their absence.*" *[1.2.3]* • The "Station Management" sub-section of DQAP Section 1 states: "*The GM delegates to the KS management team the day-to-day responsibilities for the ISFSI and decommissioning*"*[1.4.1]* • The Decommissioning Plant Manager (DPM) "*...shall delegate in writing the succession to this position during their absence.*" *[1.4.2]* • DQAP Section 1 sub-section "Delegation of Work" addresses delegation of the execution of portions of the work under the DQAP to others such as contractors, agents, or consultants. *[1.5.1]*

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• a description of how work performance is evaluated;	The "Quality Assurance" sub-section of DQAP Section 1 addresses this requirement. DQAP Section 1 sub-section "Reporting" includes the following requirement: "*The GM shall periodically have an Independent Management Assessment (IMA) performed to evaluate the effectiveness of the DQAP, as described in Appendix D of the DQAP.*" *[1.6.2]* DQAP Section 2 sub-section "Performance / Verification" includes the following requirements: a. *Personnel performing independent verification activities are responsible for verifying the achievement of acceptable quality and are different personnel than those who performed the work. [2.3.2]* c. *Work is accomplished and verified using instructions, procedures, or other appropriate means that are of a detail commensurate with the activity's complexity and importance to safety. [2.3.3]* d. *Criteria that define acceptable quality are specified, and quality is verified against these criteria. [2.3.4]*
• a description of the authority of each unit within the QA program; and	The structure, interrelationships, and areas of functional responsibility and authority for all organizational units implementing the DQAP are described throughout DQAP Section 1.
• an organization chart of the QA program organization.	A high level organizational structure of functional areas is presented in DQAP Appendix A.
17.6.1 EVALUATION CRITERIA: (continued) The staff should verify that:	
a. the organization or individual responsible for submitting the license application exercises and retains the responsibility for the establishment and execution of the overall program.	DQAP Section 1 states: "*Kewaunee Solutions (KS) is responsible for the establishment and execution of the Quality Assurance Program for the Kewaunee Power Station (KPS).*" *[1.1.1]* KS is the organization that submitted the license transfer application for KPS.

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b. major delegations of work are fully described and that in each case, organizational responsibilities and methods for control of the work by the applicant are described, including how responsibility for delegated work is to be retained and exercised.	Specific requirements for major delegation are included in the following sections of the DQAP: • For the GM, the "Responsibilities" sub-section of DQAP Section 1 states *"The individual shall delegate in writing the succession to this responsibility during their absence." [1.2.3]* • The Decommissioning Plant Manager (DPM) *"...shall delegate in writing the succession to this position during their absence." [1.4.2]* • The "Station Management" sub-section of DQAP Section 1 states: *"The GM delegates to the KS management team the day-to-day responsibilities for the ISFSI and decommissioning ..." [1.4.1]* • DQAP Section 1 sub-section "Delegation of Work" addresses delegation of the execution of portions of the work under the DQAP to others such as contractors, agents, or consultants. [1.5]
c. the licensee and its prime contractors describe how responsibility is exercised for the overall QA program and that the extent of management responsibility and authority are addressed.	A description of how responsibility is exercised for the overall DQAP implementation, and the extent of management responsibility and authority for the QA program, are described throughout DQAP Section 1. For Kewaunee decommissioning, the prime contractors will be seconded programmatically and integrated into the KS organization described in DQAP Section 1.
d. policies regarding the implementation of the QA program are documented and made mandatory.	The following excerpt from DQAP Section 1 establishes direct linkage from the highest management level to the GM: *"The General Manager (GM) reports to the Kewaunee Solutions President, and has the overall responsibility for the establishment and execution of the DQAP." [1.1.2]* The GM responsibilities are included throughout DQAP Section 1, and include reviewing and approving the DQAP, which embodies the KS QA policies, goals, and objectives.

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	The "Responsibilities" sub-section of DQAP Section 1 directs management to ensure the requirements established in the DQAP and implementing procedures are met (i.e., made the requirements mandatory): *"Management of line organizations at KPS are responsible to ensure that the quality of organizational work and activities meets the requirements set forth in the DQAP and KPS implementing procedures." [1.2.5]* DQAP Section 5 states: *"The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings."[5.1]*
e. the licensee and its contractors will evaluate the performance of work delegated to other organizations, including audits/surveillances of the contractor's QA programs and audits/surveillances of subcontractors, consultants, and vendors furnishing equipment or services to the applicant or its contractors. The frequency and method of this evaluation should be specified.	The following excerpt from DQAP Section 1.5 addresses the QA functions delegated to other organizations: *"KS may delegate the execution of portions of the work under the DQAP to others such as contractors, agents, or consultants; however, KS retains overall responsibility for those activities and the DQAP. Delegation is clearly identified in documentation and KS retains the right to verify compliance with KS quality and regulatory requirements applicable to that organization's QA Program. QA program interactions, management responsibilities, and authority for the coordinated execution of the overall QA program, are established and documented."[1.5.1]* Section 18 of the DQAP provides for the audit/surveillance of contractor QA programs, subcontractors, consultants, and vendors furnishing equipment or services to the KS or its contractors, and for the frequency and method of this evaluation.
f. that the licensee and prime contractors identify a management position that retains overall authority and responsibility for the QA program (normally, this position is filled by the QA Manager).	The "Quality Assurance" sub-section of DQAP Section 1 establishes the QAM position that addresses this requirement. [1.3]
g. the QA Manager position is at the same or a higher organization level than the position of the highest line manager directly responsible for performing activities affecting quality (such as engineering, procurement, construction, and operation) and is sufficiently independent from cost and schedule restraints (this	The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 addresses this requirement: • *"The QAM reports to the GM and shall not be assigned responsibilities that would prevent the required attention to*

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does not mean that the QA position must report outside of the project or program).	*important to safety matters. Although reporting to the GM with other line organizations, the QAM shall have the necessary independence from other line management to ensure effective oversight for all organizations." [1.3.1]* • *"The individuals who carry out radiation protection and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions." [1.3.4]* In addition, as shown on DQAP Exhibit A and as described in Section 1, line managers directly responsible for performing activities affecting quality report to the GM, and the QAM reports to the GM.
h. the authority and duties of persons and organizations performing functions related to meeting the performance objectives are clearly established and delineated in writing, including both the performing functions of attaining the requisite quality of work (quality achieving) and the assurance functions of verifying the attainment of quality (quality assuring).	The following excerpt from the "Responsibilities" sub-section of DQAP Section 1 addresses the performance functions of attaining the requisite quality of work: *"Management of line organizations at KPS are responsible to ensure that the quality of organizational work and activities meets the requirements set forth in the DQAP and KPS implementing procedures." [1.2.5]* The "Quality Assurance" and "Station Management" sub-sections of DQAP Section 1 addresses the authority, duties, and the assurance functions of verifying the attainment of quality.
i. designated QA personnel, sufficiently free from direct pressures resulting from cost and schedule, have the responsibility, delineated in writing, to stop unsatisfactory work and control further processing or delivery of nonconforming material.	The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 addresses the this requirement: • *"The QAM has the following responsibilities: Authority to stop work when quality is adversely affected. [1.3.1.F]* • *Quality Assurance (QA) personnel... have the responsibility and authority to stop work when quality is adversely affected and immediately raise concerns to the QAM." [1.3.2]*

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j. persons and organizations performing quality assurance functions have sufficient authority and organizational freedom (1) to identify quality problems, (2) to initiate, recommend, or provide solutions through designated channels, and (3) to verify implementation of solutions.	The following excerpt from the "Quality Assurance" sub-section of DQAP Section 1 addresses this requirement: *"QA personnel shall have sufficient authority and organizational freedom to identify any quality problems and to verify implementation of corrective actions." [1.3.3]*
k. persons and organizations with the above authority are identified and a description of how those actions are carried out is provided.	The "Quality Assurance" sub-section of DQAP Section 1 describes the persons and organization performing the quality assurance functions. The description of how these actions are carried are included in the respective implementing procedures. [1.3]
l. provisions are established for the resolution of disputes involving quality arising from a difference of opinion between QA personnel and other department personnel.	The following excerpt from the "Responsibilities" sub-section of DQAP Section 1 addresses these requirements: *"The GM is responsible for apprising management of the effectiveness of the DQAP implementation and is the arbitrator for non-conformances of unusual complexity." [1.2.4]* The following excerpt from DQAP Section 2 also addresses these requirements: *"Disputes arising between departments or organizations on QA matters that cannot be resolved at a lower level of management will be referred to the GM." [2.1.6]*
m. the position description ensures that the individual directly responsible for the definition, direction, and effectiveness of the overall QA program has sufficient authority to implement responsibilities effectively. This position is to be sufficiently free from cost and schedule responsibilities.	The following excerpts from the "Quality Assurance" sub-section of DQAP Section 1 address these requirements: • *"The QAM reports to the GM and shall not be assigned responsibilities that would prevent the required attention to important to safety matters. Although reporting to the GM with other line organizations, the QAM shall have the necessary independence from other line management to ensure effective oversight for all organizations." [1.3.1]*

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	• *QA personnel shall have sufficient authority and organizational freedom to identify any quality problems and to verify implementation of corrective actions. Additionally, QA personnel shall have direct access to appropriate levels of management necessary to perform their function and shall be independent from cost and schedule when opposed to quality and nuclear safety considerations." [1.3.3]*
n. the person responsible for the onsite QA program is identified by position and has the appropriate organizational position, responsibilities, and authority to exercise proper control over the QA program.	The "Quality Assurance" sub-section of DQAP Section 1 establishes the QAM position that addresses this requirement.
o. organization charts clearly identify all the onsite and offsite organizational elements that function under the cognizance of the QA program.	A high level organizational structure of functional areas is presented in DQAP Appendix A that have responsibility for all onsite and offsite elements that function under the cognizance of the QA program.
17.6.2: QUALITY ASSURANCE PROGRAM The staff should verify that the following information is included in the description of the QA program:	
• a commitment that activities affecting the quality of site decommissioning will be subject to the applicable controls of the QA program and activities covered by the QA program are identified on program defining documents;	Section 2 of the DQAP states: *"The QA Program for the Kewaunee Power Station (KPS), hereafter referred to as the program, is described in the DQAP. The program includes the DQAP and its implementing procedures, instructions, and drawings. The DQAP provides control over important to safety structures, systems and components (SSCs) and selected decommissioning related activities to an extent consistent with their importance to ensure safety and compliance as defined in procedures." [2.1.1]*
• a brief summary of the company's corporate QA policies;	There is no brief summary of the company's corporate QA policies in the DQAP. The following excerpt from DQAP Section 1 establishes direct linkage from the highest management level to the GM: *"The General Manager (GM) reports to the Kewaunee Solutions President, and has the overall responsibility for the establishment and execution of the DQAP." [1.1.2]*

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	The GM responsibilities are included throughout DQAP Section 1, and include reviewing and approving the DQAP, which embodies the KS QA policies, goals, and objectives.
• a description of provisions to ensure that technical and quality assurance procedures required to implement the QA program are consistent with regulatory, licensing, and QA program requirements and are properly documented and controlled;	The following excerpts from Section 5 of the DQAP address the requirements: • *"The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings. [5.1]* • *Controls are established which ensure that instructions, procedures, and drawings are current and accurately reflect the facility design and regulatory requirements." [5.3]*
• a description of the management reviews, including the documentation of concurrence in these quality-affecting procedures;	The following excerpt from DQAP Section 2 states: *"Each organization is responsible for ensuring that the applicable portions of the DQAP are properly documented, approved, and implemented (with trained staff, necessary materials, and approved procedures available) before an activity within the scope of the DQAP is executed." [2.1.3]* Additionally, the following excerpt from DQAP Appendix D, Section 2.0, establishes requirements for Independent Safety Review (ISR): *"Independent Safety Reviewers perform ISRs of ...procedures that are subject to the DQAP requirements as detailed in approved administrative procedures."* See DQAP Exhibit D, Section 2.0, for additional detail.
• a description of the quality-affecting procedural controls of the principal contractors, including documentation of the acceptance of the controls before the initiation of activities affected by the program;	The following excerpts DQAP Section 2 address these requirements: *"Each organization is responsible for ensuring that the applicable portions of the DQAP are properly documented, approved, and implemented (with trained staff, necessary materials, and approved procedures available) before an activity within the scope of the DQAP is executed." [2.1.3]*

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• a description of how NRC will be notified of changes (a) for review and acceptance in the accepted description of the QA program as presented or referenced in the DP before implementation and (b) in organizational elements within 30 days after the announcement of the changes (note that editorial changes or personnel reassignments of a non-substantive nature do not require NRC notification);	Per Section 2 of the DQAP: *"Changes to the DQAP will be implemented in accordance with 10 CFR 50.54(a) and 10 CFR 71.106." [2.1.5]*
• a description is provided of how management (above or outside the QA organization) regularly assesses the scope, status, adequacy, and compliance of the QA program;	The following excerpts from the "Responsibilities" and "Reporting" sub-sections of DQAP Section 1 provides the means for management to regularly assess the effectiveness of the QA program, including the scope, status, adequacy, and compliance of the QA program to the requirements of 10 CFR Part 72: • *"The GM is responsible for apprising management of the effectiveness of the DQAP implementation and is the arbitrator for non-conformances of unusual complexity. The GM also directs actions to be taken based on reports and trending of quality issues submitted by the QAM. [1.2.4]* • *Management of line organizations at KPS are responsible to ensure that the quality of organizational work and activities meets the requirements set forth in the DQAP and KPS implementing procedures. [1.2.5]* • *The GM shall periodically have an Independent Management Assessment (IMA) performed to evaluate the effectiveness of the DQAP, as described in Appendix D of the DQAP." [1.6.2]* The following excerpt from the "Reporting" sub-section of DQAP Section 1 provides for management's frequent contact with program status through reports, meetings: *"KS management is involved with QA matters on a continuing basis. Periodic reports summarizing the quality of KPS activities are reviewed and approved by the QAM. These reports contain status of the program adherence to the DQAP, issues identified, unresolved items, and/or other items of interest.*

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	These reports are submitted to the GM and other KS management as deemed appropriate." [1.6.1]
• a description of the instruction provided to personnel responsible for performing activities affecting quality pertaining to the purpose, scope, and implementation of the quality-related manuals, instructions, and procedures; • a description of the training and qualifications of personnel verifying activities affecting quality in the principles, techniques, and requirements of the activity being performed; • for formal training and qualification programs, documentation includes attendees, date of attendance, and the objectives and content of the program;	The following excerpt from DQAP Appendix D, Section 3.1 applies to the Personnel responsible for performing activities affecting quality: *"Facility staff responsible for the safe storage of nuclear fuel and selected decommissioning activities shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as defined in approved procedures except for: a) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975."* In addition, sub-section "Personnel Training and Qualifications" in DQAP Section 2 requires: • *"Individual managers are responsible for ensuring that personnel working under their cognizance are provided with the necessary indoctrination training and resources to accomplish assigned activities which fall under the scope of the DQAP. [2.2.1]* • *Members of the KS staff (including audit and inspection personnel) shall have the appropriate qualifications necessary to perform their assigned duties defined in implementing procedures. These implementing procedures provide the criteria utilized for determining and assessing appropriate staff qualification. Additionally, Appendix D of the DQAP cites references that stipulate the use of specific industry standards addressing qualifications. Training programs are established and implemented to ensure that personnel achieve and maintain suitable proficiency. Personnel training and qualification records are maintained in accordance with approved procedures." [2.2.2]*
• a description of the self-assessment program to confirm that activities affecting quality comply with the QA program;	The following excerpts from the "Responsibilities" and "Reporting" sub-sections of DQAP Section 1 provides for the assessment of DQAP implementation: • *"Management of line organizations at KPS are responsible to ensure that the quality of organizational work and activities*

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	meets the requirements set forth in the DQAP and KPS implementing procedures. [1.2.5] • *The GM shall periodically have an Independent Management Assessment (IMA) performed to evaluate the effectiveness of the DQAP, as described in Appendix D* of the DQAP." *[1.6.2]*
• a commitment that persons performing self-assessment activities are not to have direct responsibilities in the area they are assessing;	The sub-section "Performance / Verification" in DQAP Section 2 states: *"Personnel performing independent verification activities are responsible for verifying the achievement of acceptable quality and are different personnel than those who performed the work." [2.3.2]*
• a description of the organizational responsibilities for ensuring that activities affecting quality are (a) prescribed by documented instructions, procedures, and drawings; and (b) accomplished through implementation of these documents; and	DQAP Section 2 states: *"Each organization is responsible for ensuring that the applicable portions of the DQAP are properly documented, approved, and implemented (with trained staff, necessary materials, and approved procedures available) before an activity within the scope of the DQAP is executed." [2.1.3]*
• a description of the procedures to ensure that instructions, procedures, and drawings include quantitative acceptance criteria (such as those pertaining to dimensions, tolerances, and operating limits) and qualitative acceptance criteria (such as workmanship samples) for determining that important activities have been satisfactorily performed.	The following excerpts from Section 5 of the DQAP meet the requirements: • *"The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or drawings. [5.1]* • *These instructions, procedures, and drawings include, as appropriate, quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished."* [5.3]

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17.6.2 EVALUATION CRITERIA: (continued) The staff should verify that: N/A	
17.6.3 DOCUMENT CONTROL The staff's review should verify that the following information is included in the description of the QA document control program:	
• a summary of the types of QA documents included in the program; and	The following excerpt from DQAP Section 6 addresses the requirement: *"The scope of the document control program includes, but is not limited to: Safety Analysis Report(s); NRC License Documents, including Technical Specifications; Design Documents and Drawings; Procurement Documents; Procedures, Manuals, Plans, Directives, Policies, Instructions, etc., and; Other documents as defined in procedures." [6.3.A-F]*
• a description of how the licensee develops, issues, revises and retires QA documents.	DQAP Section 6 addresses the requirement. Note that cancellation (retiring) is accomplished by revision and removal of the superseded document from live use, or by processing a revision to cancel a document, as described in implementing procedures.
17.6.3 EVALUATION CRITERIA: (continued) The staff should verify that:	
a. the scope of the document control program is described, and the types of controlled documents are identified. As a minimum, controlled documents include quality assurance, quality control manuals, quality-affecting procedures, and technical reports.	The following excerpt from DQAP Section 6 addresses the requirement: *"The scope of the document control program includes, but is not limited to: Safety Analysis Report(s); NRC License Documents, including Technical Specifications; Design Documents and Drawings; Procurement Documents; Procedures, Manuals, Plans, Directives, Policies, Instructions, etc., and; Other documents as defined in procedures." [6.3.A-F]*
b. procedures for the review, approval, and issuance of documents and changes will be established and described to ensure technical adequacy and inclusion of appropriate quality requirements before implementation.	The following excerpt from DQAP Section 6 addresses the requirement: *"The program will ensure that the appropriate organizations review, approve, and issue documents and changes thereto before release to ensure that the documents are adequate and applicable quality requirements are stated." [6.2]*

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c. procedures will be established to ensure that changes to documents are reviewed and approved by the same organizations as those that performed the initial review and approval or by other qualified responsible organizations delegated by the applicant.	The following excerpts from DQAP Section 6 addresses the requirements: *"Revisions of controlled documents are reviewed for adequacy and approved for release by the same organization that originally reviewed and approved the documents or by a designated organization that is qualified and knowledgeable." [6.4]*
d. procedures will be established to ensure that documents are available at the location where the activity will be performed prior to commencing work.	The following excerpt from DQAP Section 6 addresses the requirement: *"Copies of controlled documents are distributed to and used by the person performing the activity." [6.5]*
e. procedures will be established to ensure that obsolete or superseded documents are removed and replaced by applicable revisions in work areas in a timely manner.	The following excerpt from DQAP Section 6 addresses the requirement: *"The distribution of new and revised controlled documents is in accordance with procedures. Superseded documents are controlled to prevent inadvertent use." [6.6]*
17.6.4 CONTROL OF MEASURING AND TEST EQUIPMENT The staff's review should verify that the following information is included in the description of the test and measurement equipment QA program:	
• a summary of the test and measurement equipment used in the program;	The following excerpt from DQAP Section 12 addresses the requirement: *"The types of equipment covered by the program (e.g., instruments, tools, gauges, and reference and transfer standards) are defined in procedures." [12.3]*
• a description of how and at what frequency the equipment will be calibrated;	The following excerpt from DQAP Section 12 addresses the requirement: *"Measuring and test equipment is calibrated at specified intervals or immediately before use on the basis of the item's required accuracy, required calibration technique, intended use, frequency of use, stability characteristics, and other conditions affecting its performance." [12.4]*
• a description of the daily calibration checks that will be performed on each piece of test or measurement equipment; and	The following excerpts from DQAP Section 12 address the requirement: • *"The program consisting of implementing procedures reviewed and approved by the appropriate organizations will control the calibration, maintenance, and use of measuring and test*

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	equipment (M&TE) consistent with activities important to safety to ensure accuracy." [12.1] • *"Measuring and test equipment is calibrated at specified intervals or immediately before use on the basis of the item's required accuracy, required calibration technique, intended use, frequency of use, stability characteristics, and other conditions affecting its performance." [12.4]* Implementing procedures provide details for specific M&TE, e.g. a description of the daily calibration checks that will be performed on each piece of test or measurement equipment.
• a description of the documentation that will be maintained to demonstrate that only properly calibrated and maintained equipment was used during the decommissioning.	The following excerpts from DQAP Section 12 address the requirement: • *"The program consisting of implementing procedures reviewed and approved by the appropriate organizations will control the calibration, maintenance, and use of measuring and test equipment (M&TE) consistent with activities important to safety to ensure accuracy."* [12.1] • *"The types of equipment covered by the program (e.g., instruments, tools, gauges, and reference and transfer standards) and measures to document and maintain the status of all calibrated M&TE are defined in procedures."* [12.3] • *"Measuring and test equipment is labeled, tagged, or otherwise controlled to indicate its calibration status and traceability to calibration test data."* [12.5]
17.6.4 EVALUATION CRITERIA: (continued) The staff should verify that:	
a. the scope of the program for the control of measuring and test equipment is described and the types of equipment to be controlled are established.	The following excerpts from DQAP Section 12 address the requirements: • *"The program consisting of implementing procedures reviewed and approved by the appropriate organizations will control the calibration, maintenance, and use of measuring and test*

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	equipment (M&TE) consistent with activities important to safety to ensure accuracy. [12.1] • *Special calibration and control measures are not required when normal commercial practices provide adequate accuracy (e.g., rulers, tape measures, levels, and other such devices). [12.2]* • *The types of equipment covered by the program (e.g., instruments, tools, gauges, and reference and transfer standards) are defined in procedures." [12.3]*
b. QA and other organizations' responsibilities are described for establishing, implementing, and ensuring effectiveness of the calibration and adjustment program.	The following excerpt from DQAP Section 12 addresses the requirement: *"The program consisting of implementing procedures reviewed and approved by the appropriate organizations will control the calibration, maintenance, and use of measuring and test equipment (M&TE) consistent with activities important to safety to ensure accuracy." [12.1]* Implementing procedures provide details for QA and other organizations' responsibilities for establishing, implementing, and ensuring effectiveness of the calibration and adjustment program.
c. procedures will be established for calibration (technique and frequency), maintenance, and control of the measuring and test equipment.	The following excerpts from DQAP Section 12 address the requirements: • *"The program consisting of implementing procedures reviewed and approved by the appropriate organizations will control the calibration, maintenance, and use of measuring and test equipment (M&TE) consistent with activities important to safety to ensure accuracy. [12.1]* • *The types of equipment covered by the program (e.g., instruments, tools, gauges, and reference and transfer standards) are defined in procedures. [12.3]*

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	• *Measuring and test equipment is calibrated at specified intervals or immediately before use on the basis of the item's required accuracy, required calibration technique, intended use, frequency of use, stability characteristics, and other conditions affecting its performance." [12.4]*
d. the review of and documented concurrence in these procedures are described, and the organization responsible for these functions is identified.	The following excerpt from DQAP Section 12 addresses the requirements: *"The program consisting of implementing procedures reviewed and approved by the appropriate organizations will control the calibration, maintenance, and use of measuring and test equipment (M&TE) consistent with activities important to safety to ensure accuracy." [12.1]*
e. measuring and test equipment are identified and traceable to the calibration test data.	The following excerpt from DQAP Section 12 addresses the requirements: *"Measuring and test equipment is labeled, tagged, or otherwise controlled to indicate its calibration status and traceability to calibration test data." [12.5]*
f. measuring and test equipment will be labeled or tagged or "otherwise controlled" to indicate due date of the next calibration. The method to "otherwise control" equipment should be described.	The following excerpt from DQAP Section 12 addresses the requirements: *"Measuring and test equipment is labeled, tagged, or otherwise controlled to indicate its calibration status and traceability to calibration test data." [12.5]* Implementing procedures would provide details for any specific measures necessary for cases where a specific M&TE item requires control measures other than labeling or tagging. These would be case-by-case, based on very particular circumstances.
g. measuring and test equipment will be calibrated at specified intervals on the basis of the required accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurement.	The following excerpt from DQAP Section 12 addresses the requirements: *"Measuring and test equipment is calibrated at specified intervals or immediately before use on the basis of the item's required accuracy, intended use, frequency of use, stability characteristics, and other conditions affecting its performance." [12.4]*

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17.6.5 CORRECTIVE ACTION The staff's review should verify that the following information is included in the description of the corrective action program portion of the QA program:	
• a description of the corrective action procedures for the facility, including a description of how the corrective action is determined to be adequate; and	The following excerpt from the DQAP Section 16 addresses the requirement: *"The program will ensure that conditions adverse to quality (such as nonconformance, failures, malfunctions, deficiencies, deviations, and defective material and equipment) are evaluated in accordance with established procedures to assess the need for corrective action to address the condition identified, and to preclude recurrence of the condition." [16.2]*
• a description of the documentation maintained for each corrective action and any follow-up activities by the QA organization, after the corrective action is implemented.	The following excerpt from DQAP Section 16 addresses follow-up activities by QA: *"The QA organization will be included in the concurrence chain regarding the adequacy of the corrective action, and in the follow-up action to verify the proper implementation of corrective action, in accordance with approved implementing procedures." [16.3]* The following excerpt from DQAP Section 17 addresses the records requirement: *"The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents."* [17.1]

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17.6.5 EVALUATION CRITERIA: (continued) The staff should verify that:	
a. procedures will be established for a corrective action program and that the QA organization reviews and documents concurrence in the procedures.	The following excerpt from DQAP Section 5 addresses the requirement: *"The program will ensure that quality activities are prescribed by and performed in accordance with documented instructions, procedures, or* drawings." [5.1] The controls for the corrective action process that may be applied to important to safety SSCs require procedures to control these activities. These procedures are subject to QA review and approval.
b. corrective action will be documented and initiated following the determination of a condition adverse to quality (such as nonconformance, failure, malfunction, deficiency, deviation, and defective material and equipment) to preclude recurrence.	The following excerpt from the DQAP Section 16 addresses the requirement: *"The program will ensure that conditions adverse to quality (such as nonconformance, failures, malfunctions, deficiencies, deviations, and defective material and equipment) are evaluated in accordance with established procedures to assess the need for corrective action to address the condition identified, and to preclude recurrence of the condition." [16.2]*
c. the QA organization will be included in the concurrence chain regarding the adequacy of the corrective action.	The following excerpt from the DQAP Section 16 addresses the requirement: *"The QA organization will be included in the concurrence chain regarding the adequacy of the corrective action, and in the follow-up action to verify the proper implementation of corrective action, in accordance with approved implementing procedures." [16.3]*
d. follow-up action will be taken by the QA organization to verify the proper implementation of corrective action and to close out the corrective action in a timely manner.	The following excerpt from the DQAP Section 16 addresses the requirement: *"The QA organization will be included in the concurrence chain regarding the adequacy of the corrective action, and in the follow-up action to verify the proper implementation of corrective action, in accordance with approved implementing procedures." [16.3]*

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e. significant conditions adverse to quality, the cause of the conditions, and the corrective action taken to preclude repetition will be documented and reported to immediate management and upper levels of management for review and assessment.	The following excerpt from DQAP Section 16 addresses the requirement: *"Significant conditions adverse to quality shall require cause determination, corrective actions that should prevent recurrence, documentation and reporting to appropriate levels of management. Follow-up action shall be taken to verify effective implementation of the required corrective actions to prevent recurrence and to verify that they are effectively implemented." [16.4]*
17.6.6 QUALITY ASSURANCE RECORDS The staff should verify that the following information is included in the description of the QA records program:	
• a description of the manner in which the QA records will be managed;	The following excerpts from DQAP Section 17 address the requirement: • *"The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents." [17.1]* • *"Controls for the administration, identification, receipt, storage, preservation, safekeeping, retrieval, and disposition of records are provided in procedures. Responsibilities for QA and other organizations for the identification of QA and other required records, and for implementation of activities related to the records, are provided in procedures." [17.2]* The specific requirements and responsibilities for record creation, transmittal, retention (such as duration, location, fire protection, and assigned responsibilities), and maintenance associated with the records process are described in implementing procedures.

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• a description of the responsibilities of the QA organization as well as all other units involved in the decommissioning to implement and maintain QA records; and	The following excerpt from DQAP Section 17 addresses the requirement: *"Controls for the administration, identification, receipt, storage, preservation, safekeeping, retrieval, and disposition of records are provided in procedures. Responsibilities for QA and other organizations for the identification of QA and other required records, and for implementation of activities related to the records , are provided in procedures." [17.2]* The identification and control of specific records types associated with the records process are described in implementing procedures.
• a description of the QA records storage facility.	See 17.6.6 (c) below.
17.6.6 EVALUATION CRITERIA: (continued) The staff should verify that:	
a. the QA records program is described, and includes results of reviews, inspections, tests, audits, and material analyses; monitoring records of work performance; and records on the qualification of personnel, procedures, and equipment.	The following excerpt from DQAP Section 17 addresses the requirement: *"The program will ensure that sufficient records of important to safety items and activities affecting quality (e.g., design, engineering, procurement, manufacturing, construction, inspection and test, installation, pre-operation, startup, operations, maintenance, modification, decommissioning, and audits) are generated and maintained to reflect the completed work, and are consistent with applicable codes, standards, and procurement documents." [17.1]* The identification and control of specific records types associated with the records process are described in implementing procedures.
b. QA and other organizations are identified and their responsibilities are described for the definition and implementation of activities related to QA records.	The following excerpt from DQAP Section 17 addresses the requirement: *"Controls for the administration, identification, receipt, storage, preservation, safekeeping, retrieval, and disposition of records are provided in procedures. Responsibilities for QA and other organizations for the identification of QA and other required records, and for implementation of activities related to the records , are provided in procedures." [17.2]* The identification and control of specific records types associated with the records process are described in implementing procedures.

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c. suitable facilities for the storage of records are described and satisfy the requirements of ANSI/ASME NQA–1. Alternatives to the fire protection rating provisions are acceptable if record storage facilities conform to National Fire Protection Association Standard NFPA 232, Class 1, for permanent records and if the 2-hour fire-rating requirement contained in proposed ANSI N45.2.9 is met by the applicant in any one of the following three ways: (1) a 2-hour-rated vault meeting NFPA 232, (2) 2-hour-rated file containers meeting NFPA 232 (Class B), or (3) a 2-hour-rated fire resistant file room meeting NFPA 232.	The following excerpts from DQAP Section 17 describe the general requirements for the maintenance and preservation of records: • *"Controls for the administration, identification, receipt, storage, preservation, safekeeping, retrieval, and disposition of records are provided in procedures. Responsibilities for QA and other organizations for the identification of QA and other required records, and for implementation of activities related to the records, are provided in procedures.* [17.2] • *If dual storage facilities are used to ensure the record integrity, the storage facilities should be sufficiently remote from each other to preclude a single event (such as a fire or flood) from damaging both facilities."* [17.2.2] The following excerpt from DQAP Section 17 describes the QA records repository requirements for electronic records: *"Management of the electronic storage of records will utilize the guidance provided in the following industry standards as described in approved procedures: NIRMA TG11-2011, Authentication of Records and Media; NIRMA TG15-2011, Management of Electronic Records; NIRMA TG16-2017, Software Quality Assurance Documentation and Records; NIRMA TG21-2011, Required Records Protection, Disaster Recovery and Business Continuation" [17.3.1-4]* These NIRMA guidelines have been endorsed by RIS 2000-18, Guidance on Managing Quality Assurance Records in Electronic Media, dated October 23, 2000.

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17.6.7 AUDITS AND SURVEILLANCE The following information should be included in the description of the audit program:	
• a description of the audit program, including the procedures for conducting the audits or surveillances;	The following excerpts from DQAP Section 18 address the requirements: • *"QA internal and supplier audits are planned and performed by qualified auditors utilizing approved written procedures and/or checklists. [18.1]* • *Surveillances may be performed and documented when it is determined advantageous to monitor or observe an item or activity to verify conformance. Surveillance conducted by or under the direction of a Lead Auditor may be integrated into and credited toward required audit activities." [18.6]*
• a description of the records and documentation generated during the audits and the manner in which the documents are managed;	The following excerpts from DQAP Section 18 address the requirements: • *"Audit records shall be retained in accordance with approved implementing procedures. [18.9]* • *Scheduling, preparation, personnel selection, performance, reporting, response, follow-up, and records management for audits are performed in accordance with written procedures." [18.3]*
• a description of all follow-up activities associated with audits or surveillances; and • a description of the trending/tracking that will be performed on the results of audits and surveillances.	The following excerpt from DQAP Section 18 addresses the requirements, in requiring issues to be entered into the corrective action process: *"Results of audits are reviewed with the management of the organization audited. Responsible management in the areas audited shall implement the necessary corrective actions required to address deficiencies. These actions are documented and reviewed periodically and, if needed, re-examined during re-audits of the subject area to verify deficient areas have completed corrective actions." [18.8]* The audit process requires issues to be entered into the corrective action process. Additional detail regarding the follow-up, analysis

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	and trending of audit deficiencies is included within Section 16 of the DQAP, and the associated implementing procedures.
17.6.7 EVALUATION CRITERIA: (continued) The staff should verify that:	
a. audits and surveillances will be performed in accordance with pre-established written procedures or checklists and conducted by trained personnel not having direct responsibilities for the achievement of quality in the areas being audited.	The following excerpts from DQAP Section 18 address the requirements: • *"QA internal and supplier audits are planned and performed by qualified auditors utilizing approved written procedures and/or checklists. [18.1]* • *Lead Auditors shall have experience, training or qualifications commensurate with the scope and complexity of their audit responsibility. Individuals performing audits shall not have direct responsibilities in the areas being audited. [18.2]* • *Surveillance conducted by or under the direction of a Lead Auditor may be integrated into and credited toward required audit activities." [18.6]* Administrative procedures include guidance for conduct of surveillance, and for audit team training and qualification associated with the audit and surveillance process.
b. audit and surveillance results will be documented and then reviewed with management having responsibility in the area audited.	The following excerpts from DQAP Section 18 address the requirements: • *"Audit reports shall be prepared, reviewed, approved, and distributed in accordance with approved procedures. [18.7]* • *Results of audits are reviewed with the management of the organization audited." [18.8]* Administrative procedures associated with the audit process include guidance for conduct of surveillance as well.

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c. provisions exist such that appropriate follow-up corrective action to audit and surveillance reports will be undertaken by responsible management and that auditing organizations schedule and conduct appropriate follow-up to assure that the corrective action is effectively accomplished.	The following excerpt from DQAP Section 18 addresses the requirements, in requiring issues to be entered into the corrective action process: *"Responsible management in the areas audited shall implement the necessary corrective actions required to address deficiencies. These actions are documented and reviewed periodically and, if needed, re-examined during re-audits of the subject area to verify deficient areas have completed corrective actions." [18.8]* The audit process requires audit and surveillance issues to be entered into the corrective action process. Additional detail regarding the analysis and trending of audit deficiency is included within Section 16 of the DQAP, and the associated implementing procedures.
d. both technical and QA programmatic audits and surveillances will be performed to provide a comprehensive independent verification and evaluation of procedures and activities affecting quality.	The following excerpts from DQAP Section 18 address the requirements: • *"The program will establish a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of DQAP scope activities. [18.1]* • *Planned internal audits are scheduled and performed in accordance with approved procedures or checklists to provide comprehensive, independent verification, and evaluation of DQAP compliance, performance criteria, and program effectiveness. Important to Safety (10 CFR 71 and 72) activities shall be audited based on the activity's importance to safety; however, each applicable quality criterion shall be audited at least once each year. Audit of DQAP elements applicable to other activities conducted under the DQAP shall be completed for each functional area at least once every two years. Audits may be extended beyond their originally scheduled due date based on the following criteria: Audits shall be performed at the intervals designated and the schedules are based on the month in which the audit starts. A maximum extension not to exceed 25 percent of the audit interval is allowed unless restricted by regulation. When an audit interval*

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	extension greater than one month is used, the next audit from that particular area is scheduled from the original anniversary month rather than from the month of the extended audit. [18.4, 18.4, 18.4.1.A through 18.4.1.C] • *External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program... at a frequency of not greater than three (3) years with a 90 day grace period." [7.2.1.A]* These requirements bound the evaluation criteria.
e. audits and surveillances objectively assess the effectiveness and proper implementation of the QA program and address the technical adequacy of the activities being conducted.	The following excerpts from DQAP Section 18 address the requirements: • *"The program will establish a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of DQAP scope activities. [18.1]* • *Planned internal audits are scheduled and performed in accordance with approved procedures or checklists to provide comprehensive, independent verification, and evaluation of DQAP compliance, performance criteria, and program effectiveness. Important to Safety (10 CFR 71 and 72) activities shall be audited based on the activity's importance to safety; however, each applicable quality criterion shall be audited at least once each year. Audit of DQAP elements applicable to other activities conducted under the DQAP shall be completed for each functional area at least once every two years. Audits may be extended beyond their originally scheduled due date based on the following criteria: Audits shall be performed at the intervals designated and the schedules are based on the month in which the audit starts. A maximum extension not to exceed 25 percent of the audit interval is allowed unless restricted by regulation. When an audit interval extension greater than one month is used, the next audit from that particular area is scheduled from the original anniversary*

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	month rather than from the month of the extended audit." [18.4, 18.4.1.A through 18.4.1.C] These requirements bound the evaluation criteria.
f. provisions will be provided such that audits and surveillances are required to be performed in all areas where the requirements of the QA program are applicable.	The following excerpts from DQAP Section 18 address the requirements: • *"The program will establish a system of planned and documented audits in order to verify compliance with all aspects of the DQAP, and determines the effective implementation of DQAP scope activities. [18.1]* • *Surveillances may be performed and documented when it is determined advantageous to monitor or observe an item or activity to verify conformance. Surveillance should be documented in sufficient detail to identify the activity covered, identify individuals doing surveillance, and to document results and corrective measures necessary.* [18.6] • *External audits of suppliers are scheduled and performed based on the importance of the activity and to confirm implementation of the supplier's QA Program at a frequency of not greater than three (3) years with a 90 day grace period." [7.2.1.A]* These requirements bound the evaluation criteria.
g. audit and surveillance deficiency data are analyzed and trended.	The following excerpt from DQAP Section 18 addresses the requirements, in requiring issues to be entered into the corrective action process: *"Results of audits are reviewed with the management of the organization audited. Responsible management in the areas audited shall implement the necessary corrective actions required to address deficiencies. These actions are documented and reviewed periodically and, if needed, re-examined during re-audits of the subject area to verify deficient areas have completed corrective actions." [18.8]*

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	The audit process requires issues to be entered into the corrective action process. Additional detail regarding the analysis and trending of audit deficiency is included within Section 16 of the DQAP, and the associated implementing procedures.
h. reports that indicating quality trends and the effectiveness of the QA programs will be given to management for review, assessment, corrective action, and follow up.	The following excerpt from DQAP Section 16 addresses the requirement: *"Reports of conditions that are adverse to quality are analyzed to identify negative performance trends. Significant conditions adverse to quality and significant trends are reported to the appropriate levels of management." [16.6]*