CARBON FREE
POWER PROJECT
155 North 400 West, Suite 480
Salt Lake City, UT 84103

LO-121372

July 26, 2022

Docket No. 99902052

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

SUBJECT: NuScale Power, LLC Submittal of Topical Report. TR-121172, Revision 0, on behalf of CFPP, LLC for “Carbon Free Power Project (CFPP) Nuclear Quality Assurance Program Description,” Revision 002

REFERENCE: NuScale Power Letter to Nuclear Regulatory Commission, “Licensing Lead for Carbon Free Power Project, LLC”, dated October 12, 2021 (ML21299A363)

NuScale Power, LLC (“NuScale”) hereby submits TR-121172, Revision 0 on behalf of CFPP, LLC (“Grantee”) for the Carbon Free Power Project (CFPP) Nuclear Quality Assurance Program Description (QAPD), Revision 002. This submittal is a request from the Grantee to the NRC for its review and approval of the CFPP QAPD, limited in scope for use during site and Combined License Application (COLA) preparation activites. The Grantee respectfully requests the acceptance review be completed within thirty (30) days from the date of transmittal.

The enclosure to this letter contains the report entitled "CFPP Nuclear Quality Assurance Program Description," Revision 002.

This letter makes no regulatory commitments and no revisions to any existing regulatory commitments.

If you have any questions, please contact Kyra Perkins at 980-349-4117 or at kperkins@nuscalepower.com.

Sincerely,

John Volkoff
Manager, Combined License Applications
NuScale Power, LLC
COLA Support on behalf of CFPP, LLC

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Enclosure: Topical Report TR-121172, "CFPP Nuclear Quality Assurance Program Description," Revision 002

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Enclosure:

Topical Report TR-121172, "CFPP Nuclear Quality Assurance Program Description," Revision 002

CARBON FREE
POWER PROJECT

NUCLEAR QUALITY ASSURANCE PROGRAM DESCRIPTION

Revision 002

Reviewed and Approved by: _____ Digitally signed by Terry L. Krause Date: 2022.07.12 11:18:26 -05'00' Date: 7/12/2022
Quality Assurance Manager

Reviewed and Approved by: _____ Date: 7/12/2022
CFPP Project Director

Document Control Release Date: 7/12/~~2002~~ 2022 7/14/2022

Revision History

Revision Number	Sections Affected	Reason for Changes
1	Figure II.1-1	Clarified reporting relationship of the QA Manager to the Project Director and President
2	Section 1.1.4	Corrected typo. QAPDs changed to QAPD.
2	Section 1.1.4.1	Added QAM responsibilities relative to subcontracted or designated ASME BPVC Section III work.
2	Section 3	Added to allow CFPP to designate ASME BPVC Section III responsibilities.

POLICY STATEMENT

Carbon Free Power Project, LLC (CFPP), a wholly owned subsidiary of the Utah Associated Municipal Power Systems (UAMPS), shall perform Combined License Application (COLA) activities in a manner that will ensure that technical, quality, and administrative requirements important to public health and safety are effectively implemented for pre-Combined License activities.

The CFPP Nuclear Quality Assurance Program (QAP) is the Quality Assurance Program Description (QAPD) provided in this document and the associated implementing documents. Together, they provide assurance of the integrity and reliability of the Combined License (COL) data or analysis that would affect the performance of safety-related nuclear plant structures, systems, and components (SSCs). The requirements of this QAPD are consistent with the applicable requirements of 10CFR Part 50, Appendix B.

The QAPD is the top-level policy document that establishes how quality is achieved and presents CFPP's overall philosophy regarding achievement and assurance of quality. Implementing documents assign more detailed responsibilities and requirements and define the organizational interfaces involved in conducting COLA activities within the scope of the QAP. Senior management establishes overall expectations for effective implementation of the quality assurance program and is responsible for obtaining the desired result.

Compliance with the QAPD and implementing documents is mandatory for personnel directly or indirectly associated with the implementation of the CFPP QAP.

Signed

Doug Hunter
President CFPP, LLC

11/10/2021
Date

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PART I INTRODUCTION

SECTION 1 GENERAL

This Quality Assurance Program Description (QAPD) was developed using the guidance provided in NEI 11-04A, “Nuclear Generation Quality Assurance Program Description”.

The Carbon Free Power Project (CFPP) Quality Assurance Program Description (QAPD) is the top-level policy document that establishes the quality assurance policy and assigns major functional responsibilities for Combined License (COL) activities conducted by or for CFPP. The QAPD describes the methods and establishes quality assurance (QA) and administrative control requirements that meet 10 CFR 50, Appendix B. The QAPD is based on the requirements and guidance of ASME NQA-1-2008 and NQA-1a-2009 Addenda, "Quality Assurance Requirements for Nuclear Facility Applications".

The QA Program (QAP) is defined by the NRC-approved regulatory document that describes the QA elements (i.e., the QAPD), along with the associated implementing documents. Procedures and instructions that control CFPP activities will be developed before the commencement of those activities. Policies establish high-level responsibilities and authority for carrying out important administrative functions which are outside the scope of the QAPD. Procedures establish practices for certain activities which are common to CFPP performing those activities so that the activity is controlled and carried out in a manner that meets QAPD requirements. Procedures establish detailed implementation requirements and methods and may be used to implement policies or be unique to particular functions or work activities.

1.1 Scope/Applicability

The QAPD applies to COL activities affecting the quality and performance of safety-related structures, systems, and components (SSCs).

Safety-related SSCs are identified by design documents. The technical aspects of these items are considered when determining program applicability, including, as appropriate, the item's design safety function. Implementing documents assign more specific requirements regarding QAPD applicability.

PART II QUALITY ASSURANCE PROGRAM DESCRIPTION DETAILS

SECTION 1 ORGANIZATION

This section describes the CFPP organizational structure, functional responsibilities, levels of authority, and interfaces for establishing, executing, and verifying QAPD implementation. The organizational structure includes corporate/support/off-site and on-site functions for CFPP including interface responsibilities for multiple organizations that perform COLA quality-related functions. Implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of the QAPD. Management gives careful consideration to the timing, extent, and effects of organizational structure changes.

The CFPP Project Director is responsible for determining the size of the Quality Assurance staff commensurate with the duties and responsibilities assigned.

Design, engineering, and environmental services are provided to the CFPP organization by two primary contractors in accordance with their QAPs. These two contractors are Fluor Enterprises Inc. (Fluor) and NuScale Power LLC (NuScale). Burns & McDonnell Engineering Company, Inc. (BMcD) and MPR Associates, Inc. (MPR) are providing Owner's Engineer services to CFPP in support of COLA activities.

The following sections describe the reporting relationships, functional responsibilities, and authorities for organizations implementing and supporting the CFPP QA Program. The CFPP organization is shown in Figure II.1-1.

1.1 President

The President is responsible for all aspects of the design, construction, and operation of CFPP's nuclear plants. The President is also responsible for all technical and administrative support activities provided by CFPP and contractors. The President directs the CFPP Project Director fulfillment of their responsibilities. The President reports to the UAMPS Board of Directors concerning all matters.

1.1.1 CFPP Project Director

The CFPP Project Director reports to the CFPP President and is responsible for the establishment and implementation of the QAPD. The CFPP Project Director also directs the planning and development of the CFPP staff and organization resources. The CFPP Project Director is also responsible for establishing and managing the nuclear steam supply system (NSSS) contract and Engineering contracts for the development of new nuclear generation.

1.1.2 CFPP Owner’s Engineers

The CFPP Owner’s Engineers are responsible for support of the CFPP organization by providing oversight of Engineering, Licensing, Document Control, and other support where applicable.

The CFPP Owner’s Engineers report to the CFPP Project Director and are responsible for supporting

oversight of COLA on-site work, quality assurance, scheduling of COLA activities, risk management, and cost estimating.

1.1.3 Contract Manager

The Contract Manager, reports to the CFPP Project Director and is responsible for managing contracts for CFPP activities in accordance with the QAPD.

1.1.4 Quality Assurance

The CFPP Quality Assurance Organization is responsible for independently planning and performing activities to verify the development and effective implementation of the CFPP QAPD including but not limited to Engineering, Licensing, Document Control, Corrective Action Program, and Procurement that support COLA activities.

1.1.4.1 Quality Assurance Manager

The Quality Assurance Manager (QAM) reports to the CFPP Project Director for the COLA activities and is responsible for developing and maintaining the CFPP QAPD, evaluating compliance to Quality Assurance Program requirements, and managing Quality Assurance Organization resources.

The Quality Assurance Manager is responsible for the development and verification of the implementation of the QAPD described in this document. The QAM is responsible for assuring compliance with regulatory requirements and procedures through audits and technical reviews; monitoring organizational processes to ensure conformance to commitments and licensing document requirements; and ensuring that vendors providing quality services, parts, and materials to CFPP are meeting the requirements of 10 CFR 50, Appendix B through NUPIC or CFPP vendor audits. Where applicable, the QAM is also responsible for confirming that entities to whom ASME Boiler and Pressure Vessel Code (BPVC) Section III work is subcontracted or designated, hold current and appropriate Certificates of Authorization and that the applicable quality program is satisfactorily implemented. The QAM has sufficient independence from other CFPP priorities to bring forward issues affecting safety and quality and makes judgments regarding quality in all areas regarding CFPP's activities as appropriate. The QAM may make recommendations to the CFPP management regarding improving the quality of work processes. If the QAM disagrees with any actions taken by the CFPP organization and is unable to obtain a resolution, the QAM shall bring the matter to the attention of the CFPP President, who will determine the final disposition.

1.1.5 NuScale Power LLC

NuScale Power LLC (NuScale) provides engineering services for plant design and licensing. These engineering services for new nuclear generation include nuclear plant design in support of the COLA development.

1.1.6 Fluor Enterprises Inc.

Fluor Enterprises Inc. (Fluor) provides engineering services for the development of the COLA. These engineering services include site-specific licensing, engineering, and design activities; including site characterization and other activities necessary to support the development of the COLA.

1.2 Authority to Stop Work

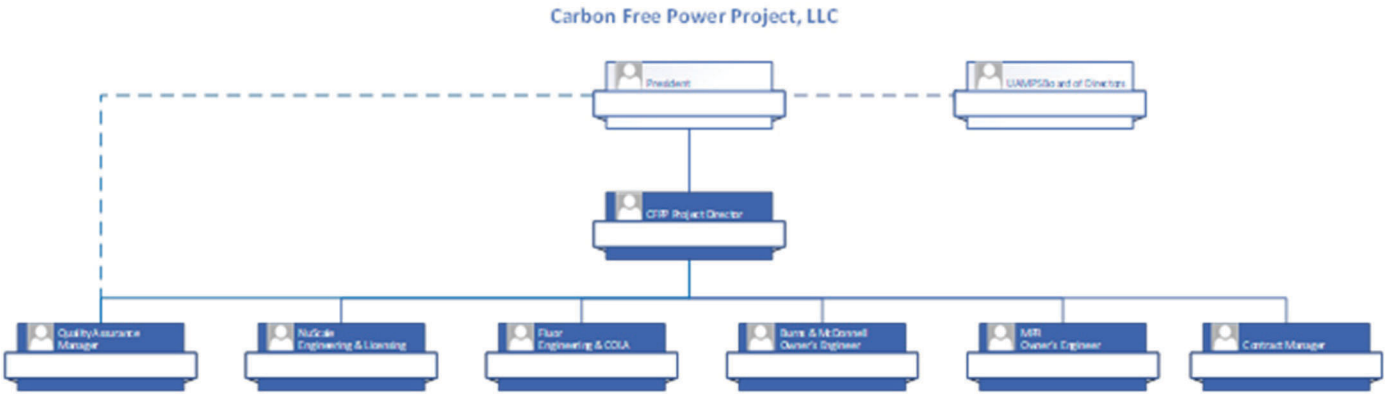
Quality Assurance and Quality Control Inspection personnel have the authority, and the responsibility, to stop work in progress that is not being done per approved procedures or where safety or SSC integrity may be jeopardized. This authority extends to off-site work performed by suppliers that furnish safety-related materials and services to CFPP.

1.3 Quality Assurance Organizational Independence

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

Figure II.1-1

CFPP Organization



SECTION 2 QUALITY ASSURANCE PROGRAM

The Carbon Free Power Project (CFPP) has established the necessary measures and governing procedures to implement the QAP as described in this QAPD document. CFPP is committed to implementing the QAP to the extent applicable for COLA activities. Further, CFPP ensures through the systematic process described herein that its suppliers of safety-related COLA-related services meet the applicable requirements of 10 CFR 50, Appendix B. Senior management is regularly apprised of the adequacy of implementation of the QAP through the audit functions described in Part II, Section 18.

The objective of the QAP is to provide assurance of the integrity and reliability of the COL data or analysis that would affect the performance of safety-related systems, structures, and components (SSCs). The program is based on the requirements of ASME NQA-1-2008 and NQA-1a-2009 Addenda, "Quality Assurance Requirements for Nuclear Facility Applications," as further described in this document.

The QAP applies to those activities used in the development of the COLA and to technical, quality, and administrative requirements important to the public health and safety including, but not limited to, site-specific engineering related to safety-related SSCs, site geotechnical investigations, site engineering analysis, seismic analysis, and meteorological analysis. A list or system that identifies SSCs and activities to which this program applies is maintained by NuScale and the Design Certification Document is used as the basis for this list.

Delegated responsibilities may be performed under a supplier's or principal contractor's QAP, provided that the supplier or principal contractor has been approved as a supplier per the CFPP QAP. Periodic audits and assessments of supplier QA programs are performed to assure compliance with the supplier's or principal contractor's QAP and implementing procedures. In addition, routine interfaces with the supplier’s personnel provide added assurance that quality expectations are met.

For the COLA, the QAPD applies to those CFPP activities that can affect either directly or indirectly the safety-related site characteristics or analysis of those characteristics. In addition, the QAPD applies to engineering activities that are used to characterize the site or analyze that characterization.

In general, the program requirements specified herein are detailed in implementing procedures that are either CFPP implementing procedures, or supplier implementing procedures governed by a supplier quality assurance program.

A grace period of 90 days may be applied to provisions that are required to be performed periodically unless otherwise noted. Annual evaluations and audits that must be performed on a triennial basis are examples where the 90-day general period could be applied. The grace period does not allow the "clock" for a particular activity to be reset forward. The "clock" for an activity is reset backward by performing the activity early.

Audit schedules are based on the month in which the audit starts.

2.1 Responsibilities

Personnel who work directly or indirectly for CFPP are responsible for achieving acceptable quality in work covered by the QAPD. These responsibilities include the activities delineated in Part I, Section 1.1. CFPP personnel performing verification activities are responsible for verifying the achievement of acceptable quality. Activities governed by the QAPD are performed as directed by documented instructions, procedures, and drawings that are of a detail appropriate for the activity's complexity and effect on safety. Instructions, procedures, and drawings specify quantitative or qualitative acceptance criteria as applicable or appropriate for the activity, and verification is against these criteria. Provisions are established to designate or identify the proper documents to be used in an activity, and to ascertain that such documents are being used. The Quality Assurance Manager is responsible to verify that processes and procedures comply with QAPD and other applicable requirements, that such processes or procedures are implemented, and that management appropriately ensures compliance.

2.2 Delegation of Work

CFPP retains and exercises the responsibility for the scope and implementation of an effective QAP. Positions identified in Part II, Section 1, may delegate all or part of the activities of planning, establishing, and implementing the program for which they are responsible to others, but retain the responsibility for the program's effectiveness.

Decisions affecting safety are made at the appropriate level based upon their nature and effect, with technical advice or review as appropriate.

2.3 COL Site-Specific Safety-Related Design Basis Activities

COL site-specific safety-related design basis activities are defined as those activities, including sampling, testing, data collection, and supporting engineering calculations and reports, that will be used to establish design inputs for safety-related SSCs. The development of the CFPP COLA will involve site testing, data collection, and calculations that may create or bound safety-related design basis data. Site testing and data collection of information pertaining to the physical characteristics of the site that have the potential to affect safety-related design will be treated as safety-related.

2.4 Periodic Review of the Quality Assurance Program

Management of those organizations implementing the QA program, or portions thereof, shall assess the adequacy of that part of the program for which they are responsible to assure its effective implementation at least once each year or at least once during the life of the activity whichever is shorter.

2.5 Issuance and Revision to Quality Assurance Program

Changes to the QAPD are evaluated by the CFPP Quality Assurance Manager to ensure that such changes do not degrade safety for previously approved quality assurance controls specified in the QAPD. This document shall be revised as appropriate to incorporate additional QA commitments that may be established during the COLA development process. New revisions to the document will be reviewed, at a minimum, by the CFPP Quality Assurance Manager and approved by the CFPP Project Director.

2.6 Personnel Training and Qualifications

Personnel assigned to implement elements of the QAPD shall be capable of performing their assigned tasks by experience, qualification, and competence.

2.7 Independent Review Body

A group may function as an Independent Review Body (IRB). In discharging its review responsibilities, the IRB keeps safety considerations paramount when opposed to cost or schedule considerations. One or more organizational units may collectively perform this function.

SECTION 3 DESIGN CONTROL

Design activities being performed during the COLA development are performed under contract by NuScale and Fluor in accordance with their documented Quality Assurance Programs that meet the requirements of 10 CFR 50, Appendix B.

CFPP may designate certain of its responsibilities to other organizations as allowed in ASME BPVC Section III, Paragraph NCA-3211. The organization shall act as CFPP's designee, however, CFPP shall retain responsibilities for such activities. This includes, but is not limited to, providing Design Specifications that comply with the requirements of NCA-3211.19, Provisions of the Design Specifications. Designee assignments shall contain, as a minimum, the name and address of the designee, the responsibilities assigned, and the applicable nuclear facility or facilities.

SECTION 4 PROCUREMENT DOCUMENT CONTROL

CFPP has established the necessary measures and governing procedures to assure that purchased items and services are subject to appropriate quality and technical requirements. Procurement document changes shall be subject to the same degree of control as utilized in the preparation of the original documents. These controls include provisions such that:

- Where original technical or quality assurance requirements cannot be determined, an engineering evaluation is conducted and documented by qualified staff to establish appropriate requirements and controls to assure that interfaces, interchangeability, safety, fit, and function, as applicable, are not adversely affected or contrary to applicable regulatory requirements.
- Applicable technical, regulatory, administrative, quality, and reporting requirements (such as specifications, codes, standards, tests, inspections, special processes, and 10 CFR 21) are invoked for the procurement of items and services. 10 CFR 21 requirements for posting, evaluating, and reporting will be followed and imposed on suppliers when applicable. Applicable design bases and other requirements necessary to assure adequate quality shall be included or referenced in documents for procurement of items and services. To the extent necessary, procurement documents shall require suppliers to have a documented QA program that is determined to meet the applicable requirements of 10 CFR 50, Appendix B, as appropriate to the circumstances of procurements (or the supplier may work under CFPP's approved QA program).

Reviews of procurement documents shall be performed by personnel who have access to pertinent information and who have an adequate understanding of the requirements and intent of the procurement documents.

SECTION 5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

CFPP has established the necessary measures and governing procedures to ensure that activities affecting quality are prescribed by and performed in accordance with instructions, procedures, or drawings of a type appropriate to the circumstances and which, where applicable, include quantitative or qualitative acceptance criteria to implement the QAP as described in the QAPD. Such documents are prepared and controlled according to Part II, Section 6. In addition, means are provided to disseminate to the staff instructions of both general and continuing applicability, as well as those of short-term applicability. Provisions are included for reviewing, updating, and canceling such procedures.

5.1 Procedure Adherence

CFPP's policy is that procedures are followed, and the requirements for use of procedures have been established in administrative procedures. Where procedures cannot be followed as written, provisions are established for making changes in accordance with Part II, Section 6.

SECTION 6 DOCUMENT CONTROL

CFPP has established the necessary measures and governing procedures to control the preparation, issuance, and revision of documents that specify quality requirements or prescribe how activities affecting quality, including organizational interfaces, to ensure that correct documents are employed. The following controls, including electronic systems used to make documents available, are applied to documents and changes thereto:

- A method to identify the correct document (including revision) to be used and control of superseded documents
- Review of controlled documents for adequacy, completeness, and approval prior to distribution
- Coordinating and controlling interface documents and procedures

The types of documents to be controlled include:

- Drawings
- Engineering calculations
- Design specifications
- Purchase orders and related documents
- Vendor-supplied documents
- Audit, surveillance, and quality verification/inspection procedures
- Test reports
- Instructions and procedures for activities covered by this QAPD
- Technical specifications
- Nonconformance reports and corrective action reports

6.1 Review and Approval of Documents

Documents are reviewed for adequacy by qualified persons other than the preparer. The documented review signifies concurrence.

Prior to issuance or use, documents including revisions thereto, are approved by the designated authority. A listing of all controlled documents identifying the current approved revision, or date, is maintained so personnel can readily determine the appropriate document for use.

6.2 Changes to Documents

Changes to documents, other than those defined in implementing procedures as minor changes, are reviewed, and approved by the same organizations that performed the original review and approval unless other organizations are specifically designated. The reviewing organization has access to pertinent background data or information upon which to base their approval. Minor changes to documents, such as inconsequential editorial corrections, do not require that the

revised documents receive the same review and approval as the original documents. To avoid a possible omission of a required review, the type of minor changes that do not require such a review and approval and the persons who can authorize such a classification shall be clearly delineated in implementing procedures.

SECTION 7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

CFPP has established the necessary measures and governing procedures to control purchased items and services to assure conformance with specified requirements. Such control provides for the following as appropriate: source evaluation and selection, evaluation of objective evidence of quality furnished by the supplier, source inspection, audit, and examination of items or services.

7.1 Acceptance of Item or Service

CFPP establishes and implements measures to assess the quality of purchased items and services, whether purchased directly or through contractors, at intervals and to a depth consistent with the item or service importance to safety, complexity, quantity, and the frequency of procurement. Verification actions include testing, as appropriate, during design and construction activities. Verifications occur at the appropriate phases of the procurement process, including, as necessary, verification of activities of suppliers below the first tier.

Measures to assure the quality of purchased items and services include the following, as applicable:

- Items are inspected, identified, and stored to protect against damage, deterioration, or misuse.
- Prospective safety-related items and service suppliers are evaluated to assure only qualified suppliers are used. Qualified suppliers are audited on a triennial basis. In addition, if a subsequent contract or a contract modification significantly changes the scope, methods, or controls performed by a supplier, an audit of the changes is performed, thus starting a new triennial period.
- CFPP may utilize audits conducted by outside organizations for supplier qualification provided that the scope and adequacy of the audits meet CFPP requirements. Documented annual evaluations are performed for qualified suppliers to assure they continue to provide acceptable products and services. Industry programs, such as those applied by ASME, Nuclear Procurement Issues Corporation (NUPIC), or other established utility groups, are used as input or the basis for supplier qualification whenever appropriate. The results of the reviews are promptly considered for effect on a supplier's continued qualification and adjustments made as necessary (including corrective actions, adjustments of supplier audit plans, and input to third party auditing entities, as warranted). In addition, results are reviewed periodically to determine if, as a whole, they constitute a significant condition adverse to quality requiring additional action.
- Provisions are made for accepting purchased items and services, such as source verification, receipt inspection, pre- and post-installation tests, certificates of conformance, and document reviews (including Certified Material Test Report/Certificate). Acceptance actions/documents should be established by the Purchaser with appropriate input from the Supplier and be completed to ensure that procurement, inspection, and test requirements, as applicable, have been satisfied before relying on the item to perform its intended safety function.
- Controls are imposed for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt, and acceptance of commercial-grade services or items to assure they will perform satisfactorily in service in safety- related applications.

- If there is insufficient evidence of implementation of a QA program, the initial evaluation is of the existence of a QA program addressing the scope of services to be provided. The initial audit is performed after the supplier has completed sufficient work to demonstrate that its organization is implementing a QA program.

SECTION 8 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

This section is not applicable to the CFPP scope of work at this time.

SECTION 9 CONTROL OF SPECIAL PROCESSES

This section is not applicable to the CFPP scope of work at this time.

SECTION 10 INSPECTION

This section is not applicable to the CFPP scope of work at this time.

SECTION 11 TEST CONTROL

This section is not applicable to the CFPP scope of work at this time.

SECTION 12 CONTROL OF MEASURING AND TEST EQUIPMENT

This section is not applicable to the CFPP scope of work at this time.

SECTION 13 HANDLING, STORAGE, AND SHIPPING

This section is not applicable to the CFPP scope of work at this time.

SECTION 14 INSPECTION, TEST, AND OPERATING STATUS

This section is not applicable to the CFPP scope of work at this time.

SECTION 15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

This section is not applicable to the CFPP scope of work at this time.

SECTION 16 CORRECTIVE ACTION

CFPP has established the necessary measures and governing procedures to promptly identify, control, document, classify, and correct conditions adverse to quality. CFPP procedures assure that corrective actions are documented and initiated following the determination of conditions adverse to quality in accordance with regulatory requirements and applicable quality standards. CFPP procedures require personnel to identify known conditions adverse to quality. When complex issues arise where it cannot be readily determined if a condition adverse to quality exists, CFPP documents establish the requirements for documentation and timely evaluation of the issue. Reports of conditions adverse to quality are analyzed to identify trends. Significant conditions adverse to quality and significant adverse trends are documented and reported to responsible management. In the case of a significant condition adverse to quality, the cause is determined and actions to preclude recurrence are taken.

In the case of suppliers working on safety-related activities, or other similar situations, CFPP may delegate specific responsibilities for corrective actions, but CFPP maintains responsibility for the effectiveness of corrective action measures.

16.1 Interface with the Reporting Program

CFPP has procedures that implement a program to identify, evaluate and report defects and noncompliance's to satisfy the requirements of 10 CFR 52, 10 CFR 50.55 and 10 CFR 21 during COL design and construction and 10 CFR 21 during operations. Such a reporting program applies to safety-related activities and services performed by CFPP and/or CFPP suppliers/sub-suppliers providing input to the COLA development.

SECTION 17 QUALITY ASSURANCE RECORDS

CFPP has the necessary measures and governing procedures to ensure that sufficient records of items and activities affecting quality are developed, reviewed, approved, issued, used, and revised to reflect completed work. The provisions of such procedures include requirements for records administration, including receipt, preservation, retention, storage, safekeeping, retrieval, access controls, user privileges, and final disposition.

17.1 Record Retention

Measures are established that ensure that sufficient records of completed items and activities affecting quality are appropriately stored. Such records and their retention times are defined in appropriate procedures. In cases where state, local, or other agencies have more restrictive requirements for record retention, those requirements will be met. Records may be stored using electronic records storage and retrieval systems.

SECTION 18 AUDITS

CFPP has established the necessary measures and governing procedures to implement audits to verify that activities covered by the QAPD are performed in conformance with the established requirements. The audit programs are themselves reviewed for effectiveness as a part of the overall audit process.

18.1 Performance of Audits

Internal audits of selected aspects of the COLA process are performed with a frequency commensurate with safety significance and in a manner which assures that audits of safety-related activities are completed. Audits will focus on areas including, but not limited to, site investigation, procurement, and corrective action. Effectiveness of implementation of an organization's QA program will be verified.

The audits are scheduled on a formal preplanned audit schedule and in a manner to provide coverage and coordination with ongoing activities, based on the status and importance of the activity. Additional audits may be performed as deemed necessary by management. The scope of the audit is determined by the quality status and safety importance of the activities being performed. These audits are conducted by trained personnel not having direct responsibilities in the area being audited and in accordance with preplanned and approved audit plans or checklists, under the direction of a qualified lead auditor and the cognizance of the Quality Assurance Manager responsible for the day-to-day program as documented in Section 1.

CFPP is responsible for conducting periodic internal audits to determine the adequacy of programs and procedures (by representative sampling), and to determine if they are meaningful and comply with the overall QAPD.

The results of each audit are reported in writing to the CFPP Project Director, or designee, as appropriate. Additional internal distribution is made to other concerned management levels and to management of the internal audited organizations or activities in accordance with approved procedures.

Management responds to all audit findings and initiates corrective action where indicated. Where corrective action measures are indicated, documented follow-up of applicable areas through inspections, review, re-audits, or other appropriate means is conducted to verify implementation of assigned corrective action.

Audits of suppliers of services are conducted as described in Section 7.1.

18.2 Surveillances

As part of the quality oversight activities conducted by the CFPP QA Organization, surveillances will be conducted on the CFPP COLA related activities. Surveillance personnel shall be qualified to the Surveillance procedure by the CFPP Quality Assurance Manager. Surveillance activities include initial planning, conducting, reporting, and tracking of surveillance findings.