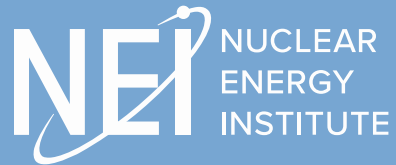


Meeting with Nuclear Energy
Institute (NEI) and the Nuclear
Regulatory Commission (NRC) to
Discuss Submittal of NEI 22-03
“Nuclear Generation Quality
Assurance Program Description”

Mark Richter - NEI
Adrienne Hudson - TVA

September 21, 2022



NEI 22-03 Pre-submittal Meeting Objectives

- Review NEI 22-03 purpose, origin and structure
- Describe review and revision process
- Summarize requirements and/or commitments, exceptions, and clarifications
- Engage NRC staff in open discussion regarding content, process and needed revisions
- Outline NEI steps to finalize and submit NEI 22-03

NEI 22-03 QA Program Description (QAPD) Template

- Guidance document to assist the industry in developing a QA Program Description document for implementation of the NQA-1 quality standard
- Same structure as NEI 11-04A, the QAPD Template based on NQA-1-2008 and NQA-1a-2009 Addenda
- Based on NQA-1-2015
 - Currently the latest version of NQA-1 endorsed by the NRC
 - Regulatory Guide 1.28 Revision 5, October 2017

NEI 22-03 QAPD Structure

- Part I – Introduction, Scope, and Applicability
- Part II – QAPD Details
 - Sections 1 to 18 aligned to the 18 Appendix B requirements
- Part III – Non-Safety Related Systems, Structures, and Components (SSC's) Quality Control
 - Section 1 – Applicability of QA Program to non-safety related SSC's
 - Section 2 – Non-safety related SSC's credited for regulatory events
- Part IV – Regulatory Commitments
 - Regulatory Guides and Standards

NEI 22-03 QAPD Structure (continued)



- Part V – Additional QA and Administrative Controls for the Plant Operational Phase
- Appendix 1 – NEI 22-03 QAPD Compliance Matrix for RG 1.33 Rev 3 and ANS/ANSI 3.2-2012
- Appendix 2 and Appendix 3 (future content) – NRC Final Safety Evaluation and NEI Responses to NRC RAI's

NEI 22-03 QAPD Development Process



- Started with NEI 11-04A QAPD Template
 - Based on NQA-1-2008 and NQA-1a-2009 Addenda and endorsed by NRC
- Revised to update and align with NQA-1-2015 requirements
- Incorporated regulatory guidance from RG 1.28 Revision 5
- Reviewed for compliance with NUREG-0800 Standard Review Plan, Chapter 17.5

NEI 22-03 QAPD Development Process



- Revised requirements and/or commitments, exceptions, and clarifications based on regulatory guidance in Safety Evaluations (SEs) and Regulatory Guides (RG's) including:
 - SE for NEI 14-05A Revision 1 addressing acceptance of laboratory accreditation in lieu of Commercial Grade Survey for calibration/testing services;
 - SE for implementation of EPRI TR 300202020796 guidance for remote/hybrid assessment techniques during exigent conditions;
 - SE for Ameren's request to allow 25% extension for supplier audits/surveys during extenuating circumstances;
 - SE for SNC's request to allow a maximum 25% extension for internal audit intervals;
 - Guidance from RG 1.28 Rev 5 providing alternative qualification for prospective Lead Auditors

NEI 22-03 QAPD Development Process



- Updated Appendix 1 to show compliance of NEI 22-03 QAPD and NQA-1-2015 with ANSI/ANS 3.2-2012 and RG 1.33 Revision 3
 - RG 1.28 Revision 5 endorses NQA-1-2015 for establishing and implementing a QA program for design and construction of nuclear plants
 - RG 1.33 Revision 3 endorses ANS/ANSI 3.2-2012 for operational phase

Conclusions and Next Steps

- Questions and open discussion with NRC staff
- Consider NRC staff feedback and potential document changes
- Final review, revision and submittal by NEI for NRC review and endorsement
- NEI addresses any RAI or follow-up requested by NRC
- NEI updates NEI 22-03 Revision 0 to include NRC SE and submits to NRC