



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 24, 2022

Mr. Bob Coffey
Executive Vice President, Nuclear
and Chief Nuclear Officer
Florida Power & Light Company
Mail Stop: EX/JB
700 Universe Boulevard
Juno Beach, FL 33408

SUBJECT: DUANE ARNOLD ENERGY CENTER – REVIEW AND ACCEPTANCE OF THE
DECOMMISSIONING QUALITY ASSURANCE PROGRAM, REVISION 0
(EPID L-2021-LLN-0003)

Dear Mr. Coffey:

By letter dated July 30, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21214A125), NextEra Energy Duane Arnold, LLC (NEDA) submitted for the U.S. Nuclear Regulatory Commission (NRC) staff's review, a proposed Revision 0 of the Decommissioning Quality Assurance Program (DQAP) for the Duane Arnold Energy Center (DAEC), in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(a)(4). The proposed DQAP is based on the NRC-approved Duane Arnold Quality Assurance Topical Report (QATR) FPL-3. QATR FPL-3 will no longer be effective at DAEC following approval and implementation of the DQAP.

NEDA conducted a comparison of the DAEC DQAP to the current QATR FPL-3 and concluded that the proposed changes result in a reduction in commitment from the current QATR in use at DAEC, and therefore require NRC approval prior to implementation. The NRC requested additional information regarding the DAEC DQAP by letter dated March 22, 2022 (ML22080A182). NEDA submitted its response in a letter dated April 13, 2022 (ML22103A056), and revised the response by letter dated April 26, 2022 (ML22116A078).

The NRC staff completed its review of the request and determined that the Decommissioning Quality Assurance Program, as described in the DAEC DQAP submitted on April 13, 2022, and supplemented by letter dated April 26, 2022, is in conformance with the applicable quality assurance program requirements of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities."

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Website at <https://www.nrc.gov/reading-rm/adams.html>.

If you or your staff have any questions regarding the above, please contact me at 301-415-3178 or via email at marlayna.doell@nrc.gov.

Sincerely,



Signed by Doell, Marlayna
on 05/24/22

Marlayna V. Doell, Project Manager
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket Nos. 50-331 and 72-032

Enclosure: Safety Evaluation

cc w/enclosure: Duane Arnold Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF
NUCLEAR REACTOR REGULATION
APPROVAL OF THE DECOMMISSIONING QUALITY ASSURANCE PLAN
NEXTERA ENERGY DUANE ARNOLD, LLC
DUANE ARNOLD ENERGY CENTER
DOCKET NOS. 50-331 AND 72-32

1.0 INTRODUCTION

By letter dated July 30, 2021 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML21214A125), NextEra Energy Duane Arnold, LLC (NEDA) submitted for the U.S. Nuclear Regulatory Commission (NRC) staff's review, a proposed Revision 0 of the Decommissioning Quality Assurance Program (DQAP) for the Duane Arnold Energy Center (DAEC), in accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.54(a)(4). The proposed DQAP is based on the NRC-approved Duane Arnold Quality Assurance Topical Report (QATR) FPL-3. QATR FPL-3 will no longer be effective at DAEC following approval and implementation of the DQAP.

NEDA conducted a comparison of the DAEC DQAP to the current QATR FPL-3 and concluded that the proposed changes result in a reduction in commitment from the current QATR in use at DAEC, and therefore require NRC approval prior to implementation. The NRC requested additional information regarding the DAEC DQAP by letter dated March 22, 2022 (ML22080A182). NEDA submitted its response in a letter dated April 13, 2022 (ML22103A056), and revised the response by letter dated April 26, 2022 (ML22116A078).

The DAEC DQAP provides a top-level overview of the Quality Assurance (QA) program controls applied to quality related items and activities at DAEC during decommissioning. The DQAP is based on the applicable portions of Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities;" 10 CFR Part 71, "Packaging and Transportation of Radioactive Material," Subpart H, "Quality Assurance;" and 10 CFR Part 72, "Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste," Subpart G, "Quality Assurance."

2.0 REGULATORY BASIS

The NRC's regulatory requirements related to QA programs are set forth in Appendix B to 10 CFR Part 50 (Appendix B), 10 CFR 50.34(b)(6)(ii), and 10 CFR 50.54(a). In addition, the NRC's regulatory requirements related to QA programs for the independent storage of spent

nuclear fuel and packaging and transportation of radioactive material are addressed in 10 CFR Part 71, Subpart H, and 10 CFR Part 72, Subpart G.

Appendix B establishes the requirements for the design, fabrication, construction and testing of structures, systems, and components (SSCs) for the facility. The pertinent requirements of Appendix B apply to all activities affecting the safety-related functions of those SSCs and include designing, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, and modifying.

The regulations in 10 CFR 50.34, "Content of applications; technical information," require that every applicant for an operating license include information in its Final Safety Analysis Report (FSAR) on the managerial and administrative controls to be used to ensure safe operation. The information on the controls shall also include a discussion on how the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied.

The regulations in (1) 10 CFR 50.54 require each powerplant subject to the requirements of Appendix B to implement a QA program; and (2) 10 CFR 50.54(a)(4) require licensees to submit to the NRC any changes to their QA program that reduce commitments.

The regulations in 10 CFR Part 71, Subpart H, establish the QA requirements applying to design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, and modification of components of packaging that are important-to-safety.

The regulations in 10 CFR Part 72, Subpart G, establish the QA requirements that apply to design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, modification of SSCs, and decommissioning that are important-to-safety.

3.0 TECHNICAL EVALUATION

The request for review and approval of the proposed DAEC DQAP, considered a reduction in commitment, was submitted by letter dated July 30, 2021, in accordance with the provisions of 10 CFR 50.54(a)(4). The letter included Revision 0 of the DQAP (provided in Enclosure 1), as well as a comparison table of the DQAP (provided in Enclosure 2) to the previously NRC-approved QATR FPL-3.

In evaluating the adequacy of the DAEC DQAP, the NRC staff used the guidance contained in NUREG-1536, "Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility," Revision 1, and NUREG-1757, Volume 1, "Consolidated Decommissioning Guidance," Revision 2.

3.1 Organization

The DQAP describes and defines the responsibility and authority for planning, establishing, and implementing an effective QA program. The DQAP provides a description of an organizational structure, functional responsibilities, levels of authority, and interfaces for establishing, executing, and verifying DQAP implementation.

The DQAP eliminates the onsite Nuclear QA Manager position and its associated responsibilities as described in Section 1.0 "Organization" of the DQAP. This is considered a

reduction in commitment since there will no longer be a requirement for a QA Manager permanently stationed at DAEC. Instead, the QA responsibilities are being moved to the corporate level. In the Table of Change, NEDA stated that “after all fuel has been transferred to dry storage, activities at the site that would fall under the requirements of the DQAP will be infrequent. The decrease in these types of activities will no longer necessitate the continuous onsite presence of Nuclear Assurance. The corporate Nuclear Assurance organization will be able to provide the necessary oversight of the site’s quality assurance program.”

Section 1.2 “Corporate Organizations” of the DQAP states that “a management position for Nuclear Oversight reports to the CNO (Chief Nuclear Officer) and is responsible to provide oversight to ensure compliance with the DQAP. Nuclear Oversight maintains a staff of supervisory, administrative, and technical personnel to verify the DQAP is effectively implemented.” It further states that “Nuclear Oversight personnel shall have sufficient authority and organizational freedom to identify any quality problems and to verify implementation of corrective actions. Additionally, Nuclear Oversight 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 safety considerations.”

In response to the NRC staff’s Request for Additional Information (RAI), Question 1, NEDA also clarified that there are three onsite management positions reporting to the onsite Decommissioning Director for functional responsibilities such as physical security, radiation protection, chemistry, engineering, emergency preparedness, corrective action, and maintenance and modification activities.

NUREG-1536, Revision 1, Section 14.5.1, “Quality Assurance Organization,” and NUREG-1757, Volume 1, Revision 2, Section 17.6.1, “Organization,” provide guidance on the structure of a QA organization for a decommissioning site. In general, there needs to be measures to designate a position that retains overall authority and responsibility for the QA program. This position should be at the same or a higher organizational level than the position of the highest line manager directly responsible for performing activities affecting quality, such as engineering and procurement, and this position should be sufficiently independent from cost and schedule restraints. The guidance did not specify that this position needs to be an onsite position. For DAEC, this position is the corporate Nuclear Oversight.

Based on the guidance provided in NUREG-1536 and NUREG-1757, and the reduced scope of activities that affect quality at DAEC after all fuel has been transferred to dry storage, the NRC staff determined that this reduction in commitment request is acceptable and the corporate Nuclear Oversight position is sufficient to provide oversight for the DQAP.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.1 and NUREG-1757, Volume 1, Revision 2, Section 17.6.1 for the scope of activities related to spent fuel and decommissioning.

3.2 Quality Assurance Program

The DQAP provides controls over activities affecting quality to an extent consistent with its importance to ensure safety and compliance. The DQAP applies to SSCs designated as important-to-safety as defined in Appendix A of the DQAP, applicable regulatory programs and activities, and SSCs identified in the facility specific Decommissioning Safety Analysis Report. Implementation of the DQAP is controlled through separately issued procedures, instructions,

and drawings. Each organization is responsible for the establishment and implementation of procedures and instructions prescribing the activities within the scope of the DQAP.

The NRC staff determined that the DQAP establishes clear program controls and authority, program reviews, and personnel training and qualification requirements, and the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.2, "Quality Assurance Program," and NUREG-1757, Volume 1, Revision 2, Section 17.6.2, "Quality Assurance Program," for the scope of activities related to spent fuel and decommissioning.

3.3 Design Control

The DQAP includes design control provisions to control design inputs, performance, interfaces, verification, changes, and records. The design control provisions include requirements for verifying the acceptability of design activities and documents, consistent with their effects on safety for SSCs that have important-to-safety functions.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.3, "Design Control," for the scope of activities related to spent fuel.

3.4 Procurement Document Control

The DQAP establishes measures for the preparation, review, and approval of procurement documents to ensure adequate quality controls for materials, equipment, and services for important-to-safety activities and SSCs. The DQAP provides controls to ensure procurement documents contain appropriate technical and quality requirements for items and services. Changes to procurement documentation are subject to the original documentation controls. The DQAP also provides controls to ensure procurement documents require vendors to incorporate QA program requirements in sub-tier procurement documents and allow right of access to the vendors, sub-tier vendors, and contractor facilities and records.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.4, "Procurement Document Control," for the scope of activities related to spent fuel.

3.5 Instructions, Procedures and Drawings

The DQAP establishes measures to ensure that quality activities are prescribed and performed in accordance with documented instructions, procedures, and drawings. Documented and approved instructions, procedures, and drawings are required to accomplish work on SSCs within the scope of the DQAP. These instructions, procedures, and drawings include, as appropriate, both quantitative and qualitative acceptance criteria for determining that activities have been satisfactorily accomplished.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.5, "Instructions, Procedures, and Drawings," for the scope of activities related to spent fuel.

3.6 Document Control

The DQAP establishes measures to control the issuance of documents, such as instructions, procedures, and drawings, including changes, which prescribe activities affecting quality within

the scope of the DQAP. The DQAP provides provisions to control documentation preparation, modification, review, approval, issuance, and distribution to ensure correct and accurate documents are being employed. Changes to documents are to be reviewed and approved by the same organization that performed the original review and approval unless another qualified organization has been designated.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.6, "Document Control," and NUREG-1757, Volume 1, Revision 2, Section 17.6.3, "Document Control," for the scope of activities related to spent fuel and decommissioning.

3.7 Control of Purchased Material, Equipment, and Services

The DQAP establishes measures for the control of purchased material, equipment, and services to ensure they conform to procurement documents. The DQAP provides controls to evaluate prospective suppliers and to ensure they can meet specified technical and quality requirements. In addition, the program requires that suppliers be periodically audited and evaluated to ensure that qualified suppliers continue to provide acceptable products and services. The DQAP requires that only qualified personnel perform audits, source inspections and surveys.

The DQAP provides measures for acceptance actions, such as source evaluation and selection, review of objective evidence of quality furnished by suppliers, source inspection, audits, and receipt inspections. Spare and replacement parts are procured such that their performance and quality are at least equivalent to those of the parts that will be replaced, as determined by engineering where applicable. Designated quality personnel, or other personnel with appropriate qualifications, are responsible for assuring source inspections, surveys, or audits of supplies are performed as necessary.

In response to the NRC staff's RAI, Question 2, NEDA confirmed that the DQAP provides provisions for the use of accreditation in lieu of commercial grade surveys for procurement of laboratory calibration and test services in accordance with the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC)-17025:2017, "General requirements for the competence of testing and calibration laboratories" (ML20325A192).

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.7, "Control of Purchased Material, Equipment, and Services," for the scope of activities related to spent fuel.

3.8 Identification and Control of Materials, Parts, and Components

The DQAP establishes measures for the identification and control of materials, parts, and components, including partially fabricated assemblies and consumables, to ensure that only correct and accepted items are used or installed. Identification is maintained on the items or in documents traceable to the items. The DQAP includes provisions for the maintenance or replacements of markings due to aging and handling.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.8, "Identification and Control of Materials, Parts, and Components," for the scope of activities related to spent fuel.

3.9 Control of Special Processes

The DQAP establishes measures to ensure that special processes that require interim quality process controls to ensure quality, such as welding, heat treating, and nondestructive examination, are controlled and accomplished by qualified personnel using approved instructions, procedures, drawings, checklists and other appropriate means. Personnel are qualified, and special processes are performed, in accordance with applicable codes, standards, specifications, criteria, or other specially established requirements.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.9, "Control of Special Processes," for the scope of activities related to spent fuel.

3.10 Inspection

The DQAP establishes measures for inspection of activities within the scope of the DQAP by or for the organization performing the activity, in order to verify conformance with approved instructions, procedures, drawings, and specifications. The DQAP also establishes measures for mandatory hold or witness points for inspection activities by designated personnel, final inspection documentation, and the handling of unacceptable inspection results. Inspections are to be performed by qualified individuals other than those who perform or directly supervise the activity being inspected.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.10, "Licensee Inspection," for the scope of activities related to spent fuel.

3.11 Test Control

The DQAP establishes measures for a documented test program to demonstrate that SSCs within the scope of the DQAP will perform satisfactorily in service in accordance with decommissioning technical specifications, license conditions and design documents. The procedures that implement testing shall specify the appropriate prerequisites for the test such as personnel qualification requirements, environmental conditions, and equipment requirements. Test results are evaluated by qualified personnel to determine compliance with established acceptance criteria.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.11, "Test Control," for the scope of activities related to spent fuel.

3.12 Control of Measuring and Test Equipment

The DQAP establishes measures to control the calibration, maintenance, handling, storage and use of measuring and test equipment (M&TE), including installed plant instrumentation that provide information important-to-safety. The DQAP establishes provisions for organizational responsibilities to ensure an effective calibration program and to provide governance and oversight of the M&TE program. The DQAP also establishes measures for handling of M&TE that are found to be damaged or out-of-calibration.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.12, "Control of Measuring and Test Equipment," and NUREG-1757,

Volume 1, Revision 2, Section 17.6.4, "Control of Measuring and Test Equipment," for the scope of activities related to spent fuel and decommissioning.

3.13 Handling, Storage, and Shipping

The DQAP establishes measures to control the handling, storage, shipping, packaging, cleaning, and preservation of items, material and equipment to prevent damage or deterioration. The DQAP establishes measures to control situations in which special requirements may be needed to ensure important-to-safety SSCs will be handled, stored and shipped adequately.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.13, "Handling, Storage, and Shipping Control," for the scope of activities related to spent fuel.

3.14 Inspection, Test, and Operating Status

The DQAP establishes measures to identify the inspection, test and operating status of items and components within the scope of the DQAP in order to prevent the inadvertent bypassing or altering the sequence of inspections or tests and to avoid inadvertent operation. The DQAP establishes measures for the control of temporary design changes to ensure appropriate installation and removal, adequate verifications, and status tracking.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.14, "Inspection, Test, and Operating Status," for the scope of activities related to spent fuel.

3.15 Nonconforming Materials, Parts, or Components

The DQAP establishes measures to identify, evaluate, segregate and disposition of nonconforming items, and to prevent inadvertent installation or use of nonconforming items. Nonconformances are corrected or resolved prior to relying on the item to perform its intended important-to-safety function. The DQAP establishes provisions for the documentation of nonconformance corrective actions and reporting of significant trends in nonconformances.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.15, "Nonconforming Materials, Parts, or Components," for the scope of activities related to spent fuel.

3.16 Corrective Action

The DQAP establishes measures to promptly identify, control, document, classify, and correct conditions adverse to quality. The DQAP requires personnel to identify known conditions adverse to quality. Significant conditions adverse to quality 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 and followed upon to verify implementation.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.16, "Corrective Action," and NUREG-1757, Volume 1, Revision 2, Section 17.6.5, "Corrective Action," for the scope of activities related to spent fuel and decommissioning.

3.17 Quality Assurance Records

The DQAP establishes measures to ensure that records of items and activities within the scope of the DQAP are identified, generated, collected, compiled, stored, maintained, and retained. The DQAP establishes measures to ensure retrievable records show objective evidence of compliance with regulations and implementing procedures.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.17, "Quality Assurance Records," and NUREG-1757, Volume 1, Revision 2, Section 17.6.6, "Quality Assurance Records," for the scope of activities related to spent fuel and decommissioning.

3.18 Audits

The DQAP establishes measures to implement audits to verify compliance and implementation. The DQAP provides provisions for audit schedule, preparation, personnel selection, personnel qualification, performance, reporting, response, followup, and records management. The DQAP establishes an internal audit program frequency commensurate with the status and importance of the activity without exceeding a 36-month period unless approved for extension as delineated in the DQAP.

An evaluation will be performed once per calendar year to determine the need for additional audit activities. When determined necessary, an additional audit activity will be performed within a timeframe established by the evaluation. The internal audit schedule is maintained, reviewed, and revised at least annually to ensure quality programs meet regulations and standards. External audits of suppliers are conducted to ensure adequate implementation of its suppliers' QA programs at a frequency that does not exceed once every 36 months unless an extension is approved in accordance with the DQAP requirements. The DQAP ensures audit results are reviewed and approved in accordance with approved procedures.

The NRC staff determined that the DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14.5.18, "Audits," and NUREG-1757, Volume 1, Revision 2, Section 17.6.7, "Audits and Surveillance," for the scope of activities related to spent fuel and decommissioning.

3.19 Regulatory Commitments

In Appendix C of the DAEC DQAP, NEDA commits to comply with the following regulatory requirements:

- Appendix B to 10 CFR Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Processing Plants;"
- 10 CFR Part 71, Subpart H, "Quality Assurance," for Packaging and Transportation of Radioactive Material;
- 10 CFR Part 72, Subpart G, "Quality Assurance," for Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater than Class C Waste; and

- NUREG/CR-6407, "Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety."

The NRC staff determined that the DAEC DQAP follows the applicable guidance in NUREG-1536, Revision 1, Section 14, "Quality Assurance Evaluation," and NUREG-1757, Volume 1, Revision 2, Section 17.6, "Decommissioning Plan: Quality Assurance Program," for the scope of activities related to decommissioning and spent fuel.

4.0 CONCLUSION

The NRC staff used the acceptance criteria of NUREG-1536, Revision 1, Section 14 and NUREG-1757, Volume 1, Revision 2, Section 17.6 as the basis for evaluating the acceptability of the proposed DAEC DQAP, Revision 0, in conformance with the applicable portions of Appendix B to 10 CFR Part 50, Subpart H of 10 CFR Part 71, and Subpart G of 10 CFR Part 72. NEDA's program description of the proposed DQAP, Revision 0, adequately describes the provisions to meet the aforementioned regulatory requirements. Therefore, the NRC staff concludes that the proposed DAEC DQAP, Revision 0, follows the NRC guidance contained within, and conforms to the format of NUREG-1536, Revision 1, Section 14 and NUREG-1757, Volume 1, Revision 2, Section 17.6. The proposed DAEC DQAP, Revision 0, complies with Appendix B to 10 CFR Part 50, Subpart H of 10 CFR Part 71, and Subpart G of CFR Part 72 requirements for the QA program and is, therefore, acceptable.

5.0 REFERENCES

1. NEDA letter to the U.S. NRC, "Request for Approval of NextEra Energy Duane Arnold, LLC's Decommissioning Quality Assurance Program Revision 0," NRC Docket No. 50-331, July 30, 2021 (ML21214A125).
2. U.S. NRC letter to NEDA, "Duane Arnold Energy Center - Request for Additional Information Regarding the Decommissioning Quality Assurance Program, Revision 0," March 22, 2022 (ML22080A182).
3. NEDA letter to the U.S. NRC, "Response to Request for Additional Information Relating to Decommissioning Quality Assurance Program, Revision 0," April 13, 2022 (ML22103A056).
4. NEDA letter to the U.S. NRC, "Revised Response to Request for Additional Information Relating to Decommissioning Quality Assurance Program, Revision 0," April 26, 2022 (ML22116A078).
5. NUREG-1536, Revision 1, "Standard Review Plan for Spent Fuel Dry Storage Systems at a General License Facility," July 2010 (ML101040620).
6. NUREG-1757, Volume 1, Revision 2, "Consolidated Decommissioning Guidance," September 2006 (ML063000243).
7. NUREG/CR-6407, "Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety," February 1996 (ML15127A114).

8. U.S. NRC letter to Nuclear Energy Institute (NEI), "Update to the Provision Recognition of the International Standard Organization/International Electrotechnical Commission Standard No. 17025, "General Requirements for the Competence of Testing and Calibration Laboratories," 2017 Edition," November 20, 2020 (ML20325A192).
9. U.S. NRC Safety Evaluation, "Final Safety Evaluation by the Office of Nuclear Reactor Regulation For the Nuclear Institute Technical Report 14-05A, 'Guidelines for the Use of Accreditation in Lieu of Commercial Grade Surveys for Procurement of Laboratory Calibration and Test Services,' Revision 1," November 23, 2020 (ML20322A019).

Principal Contributor: Yiu Law

Date: May 24, 2022

Duane Arnold ISFSI DQAP Approval Letter DATE May 24, 2022

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DATE	May 12, 2022	May 12, 2022	May 22, 2022	May 24, 2022

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