**ANS Issues Clarification on ANSI/ANS-3.2-1976 (Formerly known as N18.7), "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants."**
(*Nuclear News,* December 2004)

*Inquiry:*

I am a Program Manager for FirstEnergy and am responsible for the procedure process at all three of our nuclear sites. FirstEnergy is committed to implementing the requirements of ANSI N18.7-1976 (ANS-3.2). We have compared the wording contained in Section 5.1 of N18.7-1976 to Section 2 of ANSI N45.2-1971. The connection between the two standards is provided by an "index" on page vii of N18.7-1976.

Recent revisions of these two standards, namely ANSI NQA-1-2000 and ANS-3.2-2004 (draft), have retained essentially the same language.

We need to understand what is meant by "source documents," a term that is used in N 18.7-1976. N 45.2-1971 does not use this term but refers to the "identification of and compliance with requirements…"

If the intent of ANS-3.2 in using the term "source documents" is to reference those standards to which we are committed, then the two standards (ANS-3.2 and N45.2) are in agreement. However, if "source documents" refers to the implementing procedures, the two standards differ significantly.

Please explain the intent of ANS-3.2 in using the terms "source documents" and "index."

*Response:*

The term "source documents" does not mean standards exclusively. The term is intended to refer to the top-level procedures used to establish QA program controls, such as procedures that are referenced in a QA manual or in other top-level administrative documents used to implement the QA program. These referenced procedures may, however, invoke standards.

The intent of the "index" as used in N18.7 is to provide a comprehensive listing that identifies the manual(s) and procedures that establish QA program controls used to implement the requirements of ANSI N18.7/ANS 3.2. As stated in Section 5.1 of N18.7-1976, the index is "to provide a consolidated base for description of the program." An index that lists the ANS 3.2 requirements and links these requirements to QA manual and implementing procedures meets this stated purpose.

The index should identify the manual(s) and procedures that establish program controls for nonconformances, corrective actions, calibration of measuring and test equipment, any special processes, and similar requirements. The index is not expected to include lower level or more detailed procedures than the top-level procedures that establish QA program controls. (This type of index was especially important in 1976, when many plants were under construction. Engineering and construction organizations were separate from the plant staff and often had their own QA manuals and administrative procedures.)