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NNR: NO	THE CHEMISTRY PROGRAMME				PAGE 1			
KORC NO	ACCESS Nuclear Restricted		IMPORTANCE NS/		NEXT REVIEW DATE 2023-09-25			AUTHORISED 020-09-25

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(sgd) NG TASANA	(sgd) K GOVENDER	(sgd) N MSUMZA		
NG TASANA	K GOVENDER	N MSUMZA		
QC CHEMIST CHEMISTRY	HEAD OF TECHNICAL SUPPORT CHEMISTRY	CHEMISTRY MANAGER (ACTING)		
DATE 2020-09-17	DATE 2020-09-22	DATE 2020-09-25		

THIS STANDARD HAS BEEN SEEN AND ACCEPTED BY:

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ALARA RELATED

FCA	ALARA REVIEW	SUPERSEDES
MONITORING	YES 2020-09-16	KSC-003, Rev 5 dd. 2018-10-19 FULL REVIEW

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1.0 PURPOSE

1.1 To define the Chemistry Programme at Koeberg Nuclear Power Station.

2.0 SCOPE

2.1 Applicable to all areas of responsibility of the Chemistry Group.

3.0 DEFINITIONS AND ABBREVIATIONS

N/A

4.0 REFERENCES

4.1 Referenced Documents

- 4.1.1 335-2, Rev 5: Koeberg Nuclear Power Station Management Manual
- 4.1.2 IAEA Draft Specific Safety Guide DS485, Ageing Management and Development of a Programme for Long Term Operation of Nuclear Power Plants
- 4.1.3 ISO 17025:2017: General requirements for the competence of testing and calibration laboratories
- 4.1.4 KAA-500, Rev 13: The Process for Controlled Documents
- 4.1.5 KSA-011, Rev 14: The Requirements for Controlled Documents

4.2 Applicable Documents

- 4.2.1 In accordance with Appendix 1.
- 4.2.2. ISO 17025:2017: General requirements for the competence of testing and calibration laboratories

5.0 REQUIREMENTS

The management expectations for the Chemistry Program implementation are elaborated on as defined in the applicable procedure KSC 006 (Chemistry Standard and Expectations).

5.1 Basis and Strategy

5.1.1 The technical basis and strategic plans shall be defined for primary and secondary water chemistry.

5.2 Safety Aspects of Long Term Operation 5.2.1 Scope of the Programme based on understanding ageing shall be defined. 522 Preventive actions to minimise and control ageing degradation are included in the programme. 5.2.3 The Programme shall be able to detect ageing effects. 5.2.4 Monitoring and trending of ageing effects are included in the Programme. 5.2.5 The Programme is designed to mitigate ageing effects. 5.2.6 Acceptance criteria shall be defined and technically justified. 5.2.7 Corrective actions shall be implemented for non-compliance to chemistry specifications 5.2.8 Operating experience feedback and feedback of research and development results are used to optimise the Programme. 5.2.9 Quality assurance procedures, review and approval processes, and administrative controls shall be implemented. 5.3 Operating 5.3.1 Chemistry operating and permit-to-work responsibilities shall be defined. 5.4 Monitoring/Surveillance 5.4.1 Surveillance programmes shall be defined which cover primary, secondary and auxiliary systems as well as the environment, and which comply with all statutory, licensing, corporate and station/in-house requirements. 5.4.2 An analytical and radiochemistry capability shall be maintained in order to comply with the surveillance programmes and station requirements. 5.5 Control 5.5.1 The chemistry specifications of plant systems shall be documented, including a process to manage specification non-compliance. 5.5.2 Plant system chemistry shall be controlled under all conditions and states (including shutdown). 5.5.3 A data management system, which enables optimisation of plant system chemistry as well as short and long term trending shall be maintained.

Chemistry shall adopt a philosophy of 'Effective Pre-emptive Chemistry Control'

(EPCC).

5.5.4

5.6 Assurance

- 5.6.1 Quality control, OE and Self-Assessment programmes shall be implemented.
- 5.6.2 A technical support function shall exist to research and implement latest chemistry technologies and provide technical assistance to the line sections and station.
- 5.6.3 Technical alignment to the intent of ISO 17025 is applied in all the analytical techniques and associated QC/QA processes and practices. See Appendix 2 in the attachments.

5.7 Administration

5.7.1 An administration system shall be implemented covering record, procedure, budget, stores, procurement and cost control.

5.8 Training

5.8.1 A Chemistry training programme shall be implemented.

6.0 ATTACHMENTS

Appendix 1 - Level 2 Procedure Listing

Appendix 2 – Chemistry Position on ISO 17025 Accreditation

Appendix 3 – Justification

APPENDIX 1

LEVEL 2 PROCEDURE LISTING

Operating:

KAA-667 Processing a Permit to Work

KAC-032 Chemistry Operating Responsibilities

Monitoring/Surveillance:

KAA-584 Radiation I		nstrumentation Management				
KAA-595 Control of C		Chemistry Instrumentation, Analysers and Equipment				
KAA-597 Environmer		ntal Surveillance Programme				
KAA-598	SHE Manag	gement System				
KAA-625	RFE Radio	chemical Requirements				
KAA-629	Responsibil	lities for Testing Absolute and Charcoal Filters				
KAA-636	Manageme	nt of the Radioactive Effluents Programme				
KAA-688	The Correc	tive Action Process				
KAA-703	Division of I	Responsibilities for Oils at Koeberg Nuclear Power Station				
KAA-712	Marine Mor	nitoring Strategy at Koeberg Nuclear Power Station				
KAA-752	Koeberg Nu	uclear Power Station Oxygenation and Purification Process				
KAA-811	The Integra	ated Koeberg Nuclear Emergency Plan				
KBA0022CHEMSPEC00		Koeberg Chemistry Specifications				
KBA0022CHEMJUSTIF1		Technical Bases for Koeberg Chemistry Specifications				
KBA0022CHEM	IUSTIF2	Justification for the Koeberg NPS Chemistry Operating Specifications				
KEP-084	Chemical S	pill Response Plan				
KEP-I-006	ESL Opera	ation Following Emergency Plan Activation				
KEP-I-007 Collection of		of Post Accident Emergency Samples				
KEP-I-010 Set-up of th		he Alternate ESL for Emergency Plan Duties				
KGC-LUC-005 ESL Land l		Use Census Guide				
KLC-001 Chemistry		Sampling Points				
KNC-001	Chemistry Operating Specifications for Safety Related Systems					
KNC-002 Chemistry		Operating Specifications for Availability Related Systems				

APPENDIX 1 (continued)

LEVEL 2 PROCEDURE LISTING

Control:	
KAA-751	The Control of Chemical Products at Koeberg Nuclear Power Station
KAA-688	The Corrective Action Process
KAC-029	Reporting of Chemistry Results
KAC-030	Chemistry Specification Change Control
KAC-031	Issuing of Chemicals by the Chemistry Group according to the CRACK Programme
KNC-001	Chemistry Operating Specifications for Safety Related Systems
KNC-002	Chemistry Operating Specifications for Availability Related Systems
KGC-006	Guidelines for Ion Exchange Resin Change-out in Plant System Demineralisers
Assurance	: :
KAA-584	Radiation Instrumentation Management
KAA-595:	Control of Chemistry Instrumentation, Analysers and Equipment
KAA-633	Control of Radioactive Sources and X-Ray Equipment
KAA-709	Process for Performing Safety Screenings, Safety Evaluations, Safety Justifications and Safety Cases
KSA-110	Standard for Self Assessments at KNPS
KSC-001	The Radiochemistry QC Programme
KSC-004	The Analytical Chemistry QC Programme
KGC-RQC	Implementation of the Radiochemistry Quality Control Programme
Administra	ation:
KAA-500	The Process for Controlled Procedures
KAA-709	Process for Performing Safety Screenings, Safety Evaluations, Safety Justifications and Safety Cases
KSA-011	The Requirements for Controlled Documents
KSA-038	Requirements for Quality Records
KSC-006	Chemistry Standard and Expectation
Training:	
KGT-054	Chemistry Training Programme Guide

APPENDIX 2

CHEMISTRY POSITION ON ISO 17025 ACCREDITATION

Chemistry Position on ISO 17025 Accreditation

Chemistry Programme

Chemistry Position on ISO 17025 Accreditation

Rev. 0

Compiled by: HJ Morland Reviewed by N van Eeden

ISO 17025 Accreditation for Koeberg Chemistry Laboratories

Technical alignment to the intent of ISO 17025 is applied in all the analytical techniques and associated QC/QA processes and practices in the Koeberg laboratories. The Koeberg Laboratories follow the plant specific procedures which contain the key elements for accreditation.

Official accreditation is not sought for the following reasons:

- · The cost of maintaining official accreditation status.
- The resource burden of achieving and maintaining all of the administrative requirements of official accreditation, i.e. the documentation system.
- The Eskom Power Stations Laboratories each has its own station as its sole customer, therefore being officially accredited is not a requirement. (This is different to commercial analytical laboratories doing work for various paying customers, where being accredited has specific advantages over a competitor business that is not accredited.) QC/QA processes are in place to ensure compliance to the key technical aspects of ISO 17025.

Where analysis is required to be performed by an accredited laboratory, the services of the accredited Eskom Central Laboratories (RT&D) are utilised as far as possible.

Quality is further enhanced through the implementation of industry best practice which is achieved through membership of the *World Association of Nuclear Operators (WANO)*, the *Institute of Nuclear Power Operators (INPO)* and the Electric Power Research Institute (EPRI). These organisations are periodically invited to perform peer reviews at the station, supplemented by various benchmarking mechanisms and exercises.

The environmental surveillance laboratory is a member of the *Analytical Laboratories for the Measurement of Environmental Radioactivity (ALMERA)* network established and coordinated by the *International Atomic Energy Association (IAEA)*.



ISO 17025 Accreditation - Chemistry Position Rev0a (3)1 My-Doc-New docx

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APPENDIX 3

JUSTIFICATION

Revision 5

- 1. Added references to basis and strategy documents.
- 2. Included IAEA Safety Aspects of Long-term Operations.
- 3. Scheduled Review.

Revision 6

- 1. Update ISO 17025:2017: 'General requirements for the competence of testing and calibration laboratories' as reference document.
- 2. Include ISO 17025:2017 to paragraph 5.6.3.
- 3. Add Appendix 2 Chemistry Position on ISO 17025 Accreditation.