



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

December 10, 2001
NOC-AE-01001225
File No.: G25
10CFR50.54(a)
STI: 31386420

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Change QA-052 to the Operations Quality Assurance Plan Revision 14

The South Texas Project submits the attached change (QA-052) to the Operations Quality Assurance Plan. This change to the Operations Quality Assurance Plan (OQAP) reflects a change in the organization alignment. A new position, Vice President, Plant Projects has been implemented to provide specific senior management oversight of the activities related to steam generator replacement activities and the main generator rotor procurement activities. The change also includes changes in function descriptions but does not alter the function or associated responsibilities. This change does not reduce any element of or responsibilities for implementation of the QA program. This change therefore does not represent a reduction in commitment and does not require approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(3).

If there are any questions regarding this matter, please contact Mr. M. A. McBurnett at (361) 972-7206 or me at (361) 972-8434.

A handwritten signature in black ink, appearing to read "W. T. Cottle".

W. T. Cottle
President and Chief
Executive Officer

kaw

Attachment: Operations Quality Assurance Plan (Revision 14) Change QA-052

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

	OPGP05-ZN-0004	Rev. 11	Page 19 of 23
Changes to Licensing Basis Documents and Amendments to the Operating License			
Form 1	Licensing Document Change Request (Sample)		Page 1 of 1

Change Description Revise Operations Quality Assurance Plan to reflect organization change.

Originator John Savage Department Quality Date 12/6/01

Change Number (for Licensing use only) NA

Initiating Documentation Revised station organization chart dated 12/5/01

Implementing Documentation Condition Report 01-2292 and OQAP Change QA-052

Condition Report/Action No. 01-2292 Action 8

Attach or provide reference to Regulatory Compliance Evaluation
(e.g. 10CFR50.59, NEI 98-03, 10CFR50.54(a), etc). See Attachment 1

Unit(s) Affected: Unit 1 ☒ Unit 2 ☒

Implementation Status: Unit 1 Completion Date NA

Unit 2 Completion Date NA

Licensing has reviewed and agrees with the change: [Signature] 12-10-01
Signature Date

Reviewed and Approved by Deborah Paul for M.A. McBurnett 12-10-01
Approval Authority (Reference Section 2.4) Date

Reviewed and Approved by _____
(EPP & UFSAR 2.1, 2.2, 2.3) Manager, Chemistry Date

Reviewed and Approved by _____
(FHAR & UFSAR 9.5.1) Qualified Fire Protection Engineer Date

Verification of Incorporation _____
in applicable document Licensing/Quality Representative Date

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License Compliance Review			
Form 1	License Compliance Review Form (Sample)	Page 1 of 2	

PROCEDURE NUMBER	<u>Operations Quality Assurance Plan</u>	REV.	<u>14</u>
FIELD CHANGE NUMBER	<u>NA</u>	REV.	<u>NA</u>

PROCEDURE TITLE OR DESCRIPTION OPAP Change 8A-052

This form may be used only for screening permanent, temporary (field), and emergency changes to procedures, OR for other written instructions when the controlling process procedure references use of the LCR Form. This form is not to be used for screening modifications (i.e., Design Changes and Temporary Modifications).

IF the procedure is listed in Addendum 3, Procedures Exempt From 10CFR50.59 Screening, THEN skip questions 1 through 4 AND GO TO question 5.

1. Does the proposed activity involve a change to an SSC that affects an UFSAR described design function? YES ☐ NO ☐
2. Does the proposed activity involve a change to a procedure, or written instruction that affects how UFSAR described SSC functions are performed or controlled? YES ☐ NO ☐
3. Is the proposed activity inconsistent with an UFSAR described evaluation methodology, including assumed conditions or parameter values? YES ☐ NO ☐
4. Does the proposed activity involve a test or experiment not described in the UFSAR, or that is inconsistent with analyses or descriptions in the UFSAR? YES ☐ NO ☐

IF ANY ANSWERS TO QUESTIONS 1 THROUGH 4 ARE "YES", COMPLETE THIS FORM AND ATTACH ADDITIONAL SCREENING AND EVALUATION PER OPGP05-ZA-0002.

IF ALL OF THE QUESTIONS ARE ANSWERED "NO", INDICATE BELOW THE TECHNICAL JUSTIFICATION FOR BASES OF ANSWERS. IF NONE OF THE BELOW FOUR (3) TECHNICAL JUSTIFICATIONS ARE APPLICABLE THEN ATTACH THE 10CFR50.59 SCREENING PER OPGP05-ZA-0002

BASES FOR RESPONSES TO QUESTIONS 1 THROUGH 4 - CHECK ONE AND ONLY ONE

☐ BASIS 1: This change consists only of format modifications or rewording for clarification and/or editorial correction. The intent of the procedure or written instruction is not affected.

☐ BASIS 2: This change is associated with a procedure, or written instruction, which is not contained or described in the UFSAR or to which it has been determined that 10CFR50.59 does not apply.

☐ BASIS 3: This change is associated with a procedure, or activity, which is listed or described in the UFSAR but does not affect how a SSC function is performed or controlled.

☐ OTHER _____

COMMENTS: _____

(ATTACH ADDITIONAL SHEETS, IF NECESSARY).

5. Does the subject of this review require a change to ANY License Basis or Operating License documents? YES ☒ NO ☐
If "YES", refer to OPGP05-ZN-0004, "Changes To Licensing Basis Documents And Amendments To The Operating License" and resolve the issue prior to proceeding with the activity that was the subject of the LCR Review.
6. Does the subject of this review require a change to, or conflict with, ANY item that MAY be considered a station Licensing Commitment? YES ☐ NO ☒
If "YES", REFER TO OPGP05-ZN-0002, "Licensing Commitment Management and Administration" and resolve the issue prior to proceeding with the activity that was the subject of the LCR Review
7. Does the subject of this review conflict with requirements of 10CFR50.55a as implemented in the station IST and ISI programs? YES ☐ NO ☒
If "YES", do NOT make the proposed change until the associated program is revised.

THIS FORM, WHEN COMPLETED, SHALL BE RETAINED AS PART OF THE PROCEDURE REVIEW PACKAGE .

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License Compliance Review			
Form 1	License Compliance Review Form (Sample)		Page 2 of 2
PROCEDURE NUMBER <i>Operations Quality Assurance Plan</i>			REV. <i>14</i>
FIELD CHANGE NUMBER <i>NA</i>			
8.	Does the subject of this review conflict with the requirements of 10CFR50.65 as implemented in the station Maintenance Rule Program?		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
	IF "YES", do NOT make the proposed change until the associated program is revised.		
9.	If the subject of this review involves managerial or administrative procedures or written instructions governing ANY aspect of the conduct of operation of the facility, then does the subject of the review conflict with requirements of 10CFR50 Appendix B or the OQAP or Regulatory Guide 1.33? (mark "NO" if question is not applicable)		YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>
	IF "YES", do NOT make the proposed change unless action to change the associated requirements is completed (refer to item 5 above).		
10.	If the subject of the review is governed by specific regulatory requirements, then does the proposed change conflict with the associated regulatory requirements? Examples: Radiological Controls requirements in 10CFR20, Operator Licenses requirements in 10CFR55, Physical Protection requirements in 10CFR73, Emergency Plan requirements in 10CFR50.54(q) & Appendix E		
	APPLICABILITY: The question is normally only applicable to facility program procedures or specific regulatory requirements not addressed in station program procedures, OR License and Design Basis Documents. <input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - Do NOT make the proposed change. <input type="checkbox"/> N/A - Applicable Code compliance methods are in a station program procedure, License Document, or Design Document that is not being changed by the subject of this LCR.		
11.	Does the subject of this review represent or create a potential fire hazard, affect fire protection training or administration, emergency lighting or communications, or protection of the methods for achieving and maintaining safe shutdown in the event of a fire?		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH A FIRE HAZARDS EVALUATION		
12.	Does the subject of this review represent or create a potential radiological hazard to the environment?		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH A RADIOLOGICAL ENVIRONMENTAL EVALUATION		
13.	Does the subject of this review represent or create a potential non-radiological hazard to the environment?		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH A NON-RADIOLOGICAL ENVIRONMENTAL EVALUATION		
14.	Does the subject of this review represent or create a potential ALARA concern?		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH AN ALARA EVALUATION		
15.	Does the subject of this review represent or create a potential industrial safety hazard?		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH AN INDUSTRIAL SAFETY REVIEW		
16.	Does the subject of this review represent or create a potential to reduce the commitments of the nuclear security program?		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH A NUCLEAR SECURITY REVIEW		
17.	Does the subject of this review represent or create a potential to reduce the commitments or effectiveness of the Emergency Plan/Emergency Preparedness Program?		
	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH AN EMERGENCY PLAN/EMERGENCY PREPAREDNESS PROGRAM EVALUATION		
DOCUMENTS REVIEWED			
TECHNICAL SPECIFICATIONS REVIEWED:		SAR SECTIONS REVIEWED:	OTHER DOCUMENTS REVIEWED:
<i>NA</i>		<i>NA</i>	<i>10CFR50.54</i>
PREPARER (SIGN/PRINT) <i>John Savage</i>		DATE <i>12/6/01</i>	
REVIEWER (SIGN/PRINT) <i>Marion Smith / M.E. Smith</i>		DATE <i>12/6/01</i>	

THIS FORM, WHEN COMPLETED, SHALL BE RETAINED AS PART OF THE PROCEDURE REVIEW PACKAGE

ATTACHMENT 1
10CFR50.54(a) EVALUATION
QA-052
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This change to the Operations Quality Assurance Plan (OQAP) reflects a change in the organization alignment. A new position, Vice President, Plant Projects has been implemented to provide specific senior management oversight of the activities related to steam generator replacement activities and the main generator rotor procurement activities. The change also includes changes in function descriptions but does not alter the function or associated responsibilities. This change does not reduce any element of or responsibilities for implementation of the QA program. This change therefore does not represent a reduction in commitment and does not require approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(3).

CHANGE QA-052
SUMMARY OF CHANGES
Page 1 of 1

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
TOC	CH. 1.0	INSERT	QA-052
CH. 1.0	5.1	INSERT	Plant Projects
	5.1.2	DELETE	generation business
	5.1.2	INSERT	production
	5.1.3	DELETE	nuclear and risk management
	5.1.3	INSERT	probabilistic risk assessment
	5.1.4	DELETE	systems and purchasing and material
	5.1.4	INSERT	technology and supply chain
	5.1.5 (new)	INSERT	The Vice President, Plant Projects is responsible for implementing quality program requirements applicable to the following functions: steam generator replacement project and main generator rotor procurement activities.
	5.1.6	Renumber previous section 5.1.5	No change in text

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN TABLE OF CONTENTS			NUMBER Chapter TABLE OF CONTENT	REV. NO. 14
			PAGE 1 OF 2	
			EFFECTIVE DATE 02-01-00	

Chapter Number	Title Chapter	Effective Revision	Effective Notice Date	Change Notice No.
	Definitions	8	2-1-00	QA-050
1.0	Organization	10	2-1-00	QA-044,QA-045, QA-048,QA-049, QA-050, QA-052
2.0	Program Description	12	2-1-00	QA-044,QA-046, QA-047,QA-050, QA-051
3.0	Conduct of Plant Operations	7	2-1-98	
4.0	Qualification, Training, and Certification of Personnel	6	2-1-98	
5.0	Maintenance, Installation of Modifications, and Related Activities	5	2-1-98	
6.0	Design and Modification Control	7	2-1-98	QA-050
7.0	Procurement	8	2-1-00	QA-050, QA-051
8.0	Control and Issuance of Documents	6	2-1-98	
9.0	Control of Material	6	2-1-98	
10.0	Inspection	8	2-1-00	QA-044
11.0	Test Control	7	2-1-00	
12.0	Instrument and Calibration Control	6	2-1-98	
13.0	Control Of Conditions Adverse to Quality	9	2-1-00	QA-050

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Chapter Number	Title Chapter	Effective Revision	Effective Notice Date	Change Notice No.
14.0	Records Control	6	2-1-00	QA-047
15.0	Quality Oversight Activities	8	2-1-00	
16.0	Independent Technical Review	7	02-01-00	
17.0	ASME Code Section XI - Repairs and Replacements	6	02-01-00	
18.0	ASME Code Section XI - Inservice Inspection and Testing	7	02-01-00	

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1.0 PURPOSE

- 1.1 The purpose of this chapter is to describe the organizational structure as related to quality assurance and to establish the responsibilities of organizations for the South Texas Project Electric Generating Station (STP).

2.0 SCOPE

- 2.1 STP Nuclear Operating Company (STPNOC), as licensee, has the Quality responsibility for design, engineering, procurement, fabrication, modification, maintenance, repair, in-service inspection, refueling, testing, and operation of the STP.

3.0 DEFINITIONS

- 3.1 None

4.0 REFERENCES

- 4.1 None

5.0 RESPONSIBILITIES

- 5.1 The STPNOC is comprised of Generation, Plant Projects, Engineering & Technical Services, Business Services, and Safety and Quality Concerns Program. The senior management of these groups report to the President and Chief Executive Officer.

- 5.1.1 The President and Chief Executive Officer has overall responsibility for the implementation of the Operations Quality Assurance Program and approving the Operations Quality Assurance Plan (OQAP) and revisions thereto.

- 5.1.2 The Vice President, Generation is responsible for implementing quality program requirements applicable to staffing STP with qualified personnel and acquiring and coordinating the assistance of internal and external organizations for the following functions including: plant general management, production support, projects, steam generator replacement, and generation support. The senior management of these functions report to the Vice President, Generation.

QA-050

QA-052

QA-045, 052

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5.1.2.1 The Plant General Manager has prime responsibility for the safe operations of the units. The plant staff, under the direction of the Plant General Manager, develop detailed procedures and instructions for testing, operation, modification, and maintenance of the STP.

5.1.3 The Vice President, Engineering & Technical Services (E&TS) is responsible for implementing quality program requirements applicable to the following functions: engineering, quality & licensing, operating experience, probabilistic risk assessment, steam generator replacement project engineering & fabrication, and training functions. The senior management of these functions report to the Vice President, E&TS.

The Vice President, E&TS is responsible for the development, maintenance, and independent verification of implementation of the STP Quality Program; making periodic reports on its effectiveness; review of selected documents which control activities within its scope; and preparation, control, and approval of the QAP and revisions thereto.

The Vice President, E&TS is responsible for implementing quality program requirements applicable to corrective action, licensing, and independent oversight activities, and administration of the Nuclear Safety Review Board (NSRB).

The Vice President, E&TS has the authority to identify, initiate, recommend, or provide solutions to quality-related problems and verify the implementation and effectiveness of the solutions. This position has the independence to conduct Quality activities without undue pressure of cost or schedule.

5.1.3.1 The NSRB Administrator is responsible for the administrative activities related to the NSRB functions. The NSRB functionally reports directly to and advises the President and Chief Executive Officer.

5.1.3.2 The senior management of the Quality & Licensing function is responsible for independent oversight activities, including audits, independent assessments, evaluations, surveillances, performance monitoring, inspections and independent oversight of NDE examinations.

QA-045

QA-044, 045, 048, 052

QA-048

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- 5.1.3.3 The senior management of the Quality & Licensing function, at his discretion, reports directly to the President and Chief Executive Officer. During performance of independent oversight of activities relating to Licensing, the management of the Programmatic Oversight function, at his discretion, may report to the President and Chief Executive Officer.
- 5.1.3.4 The senior management of the Quality & Licensing function has the authority to stop work for cause. This authority has been granted by the President and Chief Executive Officer. The Quality organization, including the inspection staff, is based upon the anticipated Quality involvement in operations, modification, and maintenance activities.
- 5.1.3.5 The senior management of the Risk Management function is responsible for activities related to the Comprehensive Risk Management Program, including oversight of Probabilistic Safety Assessment activities. The Comprehensive Risk Management Expert Panel guides the implementation of the Comprehensive Risk Management Program and is composed of a Chairman and additional senior level management designated by the President and Chief Executive Officer.
- 5.1.4 The Vice President, Business Services is responsible for implementing quality program requirements applicable to the following functions: human resources, planning & controls, information technology, plant protection, records management services and administration, and supply chain management for STP. The senior management of these functions report to the Vice President, Business Services.
- 5.1.5 The Vice President, Plant Projects is responsible for implementing quality program requirements applicable to the following functions: steam generator replacement project and main generator rotor procurement activities.
- 5.1.6 The Manager, Safety Quality Concerns Program is responsible for implementing quality program requirements applicable to this function.

QA-049

QA-049

QA-044 052

QA-052

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6.0 REQUIREMENTS

- 6.1 The fundamental responsibility for implementing quality program requirements is assigned to all personnel performing activities affecting the safe and reliable operation of the STP. These personnel and their management are responsible for implementing through approved procedures and other work documents, the quality assurance program controls described in the OQAP. Line organizational details and responsibilities are further described in STP UFSAR Chapter 13.1.

7.0 DOCUMENTATION

- 7.1 None

8.0 ATTACHMENTS

- 8.1 None

DA-049