



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

August 1, 2012  
NOC-AE-12002887  
File No.: G09.19  
10CFR50.54(a)  
STI: 33575448

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Director, Division of Spent Fuel Storage and Transportation  
Office of Nuclear Material Safety and Safeguards  
One White Flint North  
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Rockville, MD 20852-2738

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498 and STN 50-499  
Submittal of Operations Quality Assurance Plan Change QA-075

References: 1. STPNOC letter dated June 14, 2012 from K. D. Richards to NRC Document Control Desk, "Independent Spent Fuel Storage Installation" (NOC-AE-12002873)

The STP Nuclear Operating Company (STPNOC) submits the attached change to revision 20 of the Operations Quality Assurance Plan (OQAP) as previously communicated in Reference 1. These changes provide revision to the applicable chapters of the OQAP to incorporate the elements of 10CFR72 necessary to provide the required quality program controls for Independent Spent Fuel Storage Installation (ISFSI) and Dry Cask Storage System (DCSS) activities. The change also incorporates the recordkeeping requirements of 10CFR72.174.

These changes do not reduce any elements of or previous commitments with regard to the quality program requirements for the operation of Units 1 and 2 and therefore does not represent a reduction in commitment and does not require NRC approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(3).

There are no commitments in this letter.

If there are any questions regarding this matter, please contact Ms. D. I. Towler at (361) 972-7222 or me at (361) 972-7017.

A handwritten signature in black ink, appearing to read "K. D. Richards".

K. D. Richards  
President and CEO

Attachment: Operations Quality Assurance Plan change QA-075

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NRR  
NMSS

cc:

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SUMMARY OF CHANGES  
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ALL CHANGES ARE IN BOLD TYPE

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CHAPTER	LOCATION	ACTION	TEXT
TOC	Definitions	INSERT	<b>QA-075</b>
	CH 1.0	INSERT	<b>QA-075</b>
	CH 2.0	INSERT	<b>QA-075</b>
	CH 3.0	INSERT	<b>QA-075</b>
	CH 4.0	INSERT	<b>QA-075</b>
	CH 16.0	INSERT	<b>QA-075</b>
	CH 19.0	INSERT	<b>QA-075</b>
	CH 20.0	INSERT	<b>QA-075</b>
DEFINITIONS	Abnormal Condition (a)	INSERT	<b>independent spent fuel storage installation (ISFSI), or dry cask storage system (DCSS)</b>
	Abnormal Condition (b)	INSERT	<b>,ISFSI, or DCSS</b>
	Abnormal Condition (c)	INSERT	<b>, ISFSI, or DCSS</b>
	Quality-related	INSERT	<b>and important to safety</b>
	Quality-related item	DELETE	<b>phase of STPEGS</b>
		INSERT	<b>of Units 1 &amp; 2, ISFSI, and DCSS</b>
CH 1.0	2.1	INSERT	<b>Units 1 &amp; 2, Dry Cask Storage System (DCSS), and Independent Spent Fuel Storage Installation (ISFSI)</b>
	5.5	INSERT	<b>independent spent fuel storage installation and dry cask storage system</b>
	5.5.1	INSERT	<b>independent spent fuel storage installation and dry cask storage system</b>
CH 2.0	2.1	INSERT	<b>(SSCs)</b>

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CHAPTER	LOCATION	ACTION	TEXT
CH 2.0	2.2	INSERT	<b>10CFR72, Subpart G (those features, activities, and SSCs of an Independent Spent Fuel Storage Installation (ISFSI), Dry Cask Storage System (DCSS), or a transportation package important to safety that maintain the conditions required to prevent damage to a container during handling and storage, or provide reasonable assurance that radioactive material can be received, handled, stored, and retrieved without undue risk to the health and safety of the public), added additional ASME Sections V, IX</b>
	2.3 (new section)	INSERT	<b>Additional quality requirements specific to ISFSI and DCSS are located in Reference 4.9.</b>
	3.7 (new section)	INSERT	<b>Graded Approach to Quality – Used as required by 10CFR72 to apply to all activities affecting the important to safety functions of those SSCs of the ISFSI or DCSS that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The identification of important to safety SSCs for each type of DCSS used at STP is contained within its own unique 10CFR72 (Certificate Holder's) Final Safety Analysis Report (FSAR) (as updated) and Certificate of Compliance (C of C).</b>
	4.9 (new section)	INSERT	<b>OQAP Chapter 20.0, Dry Cask Storage System and Independent Spent Fuel Storage Installation</b>
	4.10 (new section)	INSERT	<b>10CFR72, Subpart G</b>
	5.1.1	INSERT	<b>(Units 1 &amp; 2) and the ISFSI</b>
	5.1.3	INSERT	<b>10CFR72, Subpart G</b>
	5.10.1	INSERT	<b>DCSS, ISFSI</b>
CH 3.0	1.1	DELETE	<b>Electric Generating station</b>
		INSERT	<b>(Units 1 &amp; 2), Dry Cask Storage System (DCSS), and the Independent Spent Fuel Storage Installation (ISFSI)</b>

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ALL CHANGES ARE IN BOLD TYPE

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CHAPTER	LOCATION	ACTION	TEXT
CH 3.0	2.1	INSERT	<b>Units 1 &amp; 2, DCSS, and ISFSI</b>
CH 4.0	1.1	DELETE	<b>Electric Generating Station</b>
	2.2 (new section)	INSERT	<b>Additional requirements specific to Dry Cask Storage System and Independent Spent Fuel Storage Installation activities are provided in Reference 4.7.</b>
	4.7 (new section)	INSERT	<b>OQAP Chapter 20.0, Dry Cask Storage System and Independent Spent Fuel Storage Installation</b>
CH 4.0	5.3.3	INSERT	<b>and 4.7</b>
CH 16.0	6.3.9	INSERT	<b>Independent Spent Fuel Storage Installation and Dry Cask Storage System</b>
CH 19.0	4.7	INSERT	<b>10CFR72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste</b>
	5.1.6.17	INSERT	<b>Review of activities related to the Independent Spent Fuel Storage Installation and the Dry Cask Storage System pursuant to the provisions of 10CFR72.</b>
	5.1.7	INSERT	<b>and 5.1.6.17</b>
	5.2.3.10	INSERT	<b>Review of activities related to the Independent Spent Fuel Storage Installation and the Dry Cask Storage System pursuant to the provisions of 10CFR72.</b>
CH 20.0	new chapter	INSERT	<b>entire chapter</b>

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>TABLE OF CONTENTS</b>		<b>NUMBER</b>  <b>Chapter</b> <b>TABLE</b> <b>OF</b> <b>CONTENT</b>	<b>REV.</b> <b>NO.</b>  <b>20</b>
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Chapter Number	Title Chapter	Effective Revision	Effective Date	Change Notice No.
	Definitions	9	2-1-02	QA-075
1.0	Organization	16	2-1-12	QA-074, QA-075
2.0	Program Description	18	2-1-12	QA-074, QA-075
3.0	Conduct of Operation	8	2-1-10	QA-075
4.0	Qualification, Training, and Certification of Personnel	6	2-1-98	QA-075
5.0	Maintenance, Installation of Modifications, and Related Activities	5	2-1-98	
6.0	Design and Modification Control	10	2-1-12	
7.0	Procurement	13	2-1-12	QA-074
8.0	Control and Issuance of Documents	6	2-1-98	
9.0	Control of Material	6	2-1-98	
10.0	Inspection	11	2-1-08	
11.0	Test Control	8	2-1-08	
12.0	Instrument and Calibration Control	6	2-1-98	
13.0	Control Of Conditions Adverse to Quality	14	2-1-12	QA-074
14.0	Records Control	8	2-1-06	QA-074

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Chapter	Title	Effective	Effective	Change
Number	Chapter	Revision	Date	Notice No.
15.0	Quality Oversight	13	2-1-12	QA-074
	Activities			
16.0	Independent Technical	12	2-1-12	QA-074, QA-075
	Review			
17.0	ASME Code Section XI -	10	2-1-12	QA-074
	Repairs and Replacements			
18.0	ASME Code Section XI -	11	2-1-12	QA-074
	Inservice Inspection and			
	Testing			
19.0	Administrative Controls	5	2-1-12	QA-074, QA-075
20.0	Dry Cask Storage System and	0	8-9-12	QA-075
	Independent Spent Fuel Storage			
	Installation			

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This chapter is provided to define terminology used in chapters of the OQAP. They are derived from standard definitions where possible. Program procedures and documents, which implement the OQAP, may provide variations of these definitions provided the intent of the OQAP definition and requirements are satisfied.

### DEFINITIONS

Abnormal Condition - Any of the following:

- a. Exceeding a limiting condition for a power plant, independent spent fuel storage installation (ISFSI), or dry cask storage system (DCSS) operation established in the applicable technical specifications or technical requirements manual.
- b. Observed inadequacies in the implementation of administrative or procedural controls such that the adequacy causes or threatens to cause the existence or development of an unsafe condition in connection with the operation of a nuclear power plant, ISFSI, or DCSS.
- c. Conditions arising from natural or off-site man-made events that affect or threaten to affect the safe operation of a power plant, ISFSI, or DCSS.

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Administrative controls - Rules, orders, instructions, procedures, policies, and designations of authority and responsibility written by management to obtain assurance of safety and high-quality operation.

Approval - An act of endorsing or adding positive authorization or both.

Approved Vendors List - A listing of vendors who have been evaluated to specific criteria and have been found to be qualified to provide specific items and/or services.

As-Built Data - Documented data that describe the condition actually achieved in a product.

Assessment/Evaluation - Systematic examination of plant systems/components, various plant activities or incidents to evaluate the effectiveness of work practices and/or management controls (i.e., self-assessments, independent assessments, and combinations of the two).



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**Audit** - A documented activity performed in accordance with written procedures or checklists to verify, by examination and evaluation of objective evidence, that applicable elements of the quality assurance program have been developed, documented, and effectively implemented in accordance with specified requirements. An audit does not include surveillance or inspection for the purpose of process control or product acceptance (ANSI N45.2.12). An audit may include performance monitoring as an input to satisfy a specific portion or aspect of an audit, but should not totally replace an audit.

**Authorized Nuclear Inspector (ANI)** - Inspectors performing inspections required by Section III of the ASME Code who have been qualified by written examination under the rules of any state of the United States or province of Canada, which has adopted the Code. The inspector shall be an employee of an authorized inspection agency and shall not be an employee of the Certificate of Authorization holder. The ANI shall meet the requirements of ANSI N626.

**Authorized Nuclear Inservice Inspector (ANII)** - Inspectors performing inspections required by Section XI of the ASME code. The ANII is a representative of an authorized inspection agency or a state or municipality of the United States, Canadian Province, or other enforcement authority having jurisdiction over the Nuclear Power components at the plant site.

**Calibration** - The process by which standards or working equipment are checked against standards of known higher accuracy and adjusted as necessary to ensure their compliance with designated specifications.

**Certification** - The action of determining, verifying, and attesting in writing to the qualifications of personnel or material.

**Cleanness** - A state of being clean in accordance with predetermined standards, and usually implies freedom from dirt, scale, heavy rust, oil, or other contaminating impurities.

**Commercial Grade Item** - A commercial grade item (as defined in 10CFR21) is one which:

A structure, system, or component, or part thereof that affects its safety function that was not designed and manufactured as a basic component. Commercial grade items do not include items where the design and manufacturing process require in-process inspections and verifications to ensure that defects or failures to comply are identified and corrected (i.e., one or more critical characteristics of the item cannot be verified)

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Component - A piece of equipment such as a vessel, piping, pump, valve, or core support structure, which will be combined with other components to form an assembly.

Contaminants - Foreign materials such as mill scale, dirt, oil, chemicals, and any matter that renders a fluid, solid, or surface impure and unclean according to present standards of acceptable cleanness.

Contractor - Any organization under contract for furnishing equipment, material, or services. It includes the term's vendor, supplier, subcontractor, fabricator, and subtier levels of these, where appropriate. Prime contractor is used to indicate either the architect engineer, NSSS supplier, constructor, or nuclear fuel supplier.

Corrective Action - Any appropriate measure applied for the purpose of making less likely the recurrence of the initial deficiency. Examples are:

- a. Revision of procedures, practices, and/or design documents.
- b. Increased surveillance of procedures and practices.
- c. Work stoppage until problem situation is alleviated.
- d. Special training of personnel.

Corrective Maintenance - Repair and restoration of equipment or components that have failed or are malfunctioning and are not performing their intended function.

Critical Attribute - An attribute or capability of a component to support a risk significant system function.

Critical Characteristics - Important design, material and performance characteristics of a commercial grade item that, once verified, will provide reasonable assurance that the item will perform its intended safety function.

Dedication - An acceptance process undertaken to provide reasonable assurance that a commercial grade item to be used as a basic component (as defined in 10CFR21) will perform its intended safety function and, in this respect, is deemed equivalent to an item designed and

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manufactured under a 10CFR50, Appendix B, quality assurance program. This assurance is achieved by identifying the critical characteristics of the item and verifying their acceptability by inspections, tests, or analyses performed by the purchaser or third-party dedicating entity after delivery, supplemented as necessary by one or more of the following: commercial grade surveys; product inspections or witness at holdpoints at the manufacturer's facility, and analysis of historical records for acceptable performance. In all cases, the dedication process must be conducted in accordance with the applicable provisions of 10CFR50, Appendix B. The process is considered complete when the item is designated for use as a basic component (as defined in 10CFR21).

Deficiency - The characteristic of an item or document that makes it nonconforming with the original criteria and is reported as audit findings, supplier deficiencies, event reports, significant defects, nonconformance reports, corrective action reports, or other procedurally controlled mechanisms.

Design - Technical and management processes which commence with identification of design input and which lead to and include the issuance of design output documents.

Design Control - Design control is the process used to verify that the design drawings, design calculations and specifications, including fabrication and inspection procedures for both shop and field, meet the project requirements.

Design Input - Those criteria, parameters, bases, or other design requirements upon which a detailed final design is based.

Design Output - Documents such as drawings, specifications, and other documents defining technical requirements of structures, systems, and components.

Document Review - The process of appraisal of documentation to determine the adequacy of the document with respect to quality/technical requirements.

Drawing - A document which depicts the geometric configuration of an item, or the function of an item.

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Equivalency Evaluation - A technical evaluation performed to confirm that an alternative item, not identical to the original item, will satisfactorily perform its intended function once in service. This term is synonymous with "Equal-to-or-Better-Than Evaluation".

Examination - An element of inspection consisting of investigation of materials, components, supplies, or services, to determine conformance to those specified requirements which can be determined by such investigation. Examination is usually nondestructive and includes simple physical manipulation, gaging, and measurement.

Handling - An act of physically moving items by hand or mechanical means but not including transport modes.

Hold Point - A preselected step in any procedure or work process that identifies a portion or portions of the procedure or work process which requires inspection due to the complexity, safety considerations, and/or inaccessibility of the activity and beyond which work may not progress until the required inspection is performed.

In-Service Inspection - The inspection performed generally during a reactor refueling outage or plant shutdown which assures that the nuclear equipment, vessels, and materials are of sufficient integrity to provide protection of public health and safety.

Inspection - Examination or measurement to verify whether an item or activity conforms to specific requirements.

Item - Any level of unit assembly, including structures, system, subsystem, subassembly, component, part, or material.

Material - A substance or combination of substances forming components, parts, pieces, and equipment items. (Intended to include such as machinery, castings, liquids, formed steel shapes, aggregates, and cement.)

Nonconformance - A deficiency in characteristic, documentation, or procedure which renders the quality of an item unacceptable or indeterminate. Examples of nonconformance include: physical defects, test failures, incorrect or inadequate documentation, or deviation from prescribed processing, inspection, or test procedures.

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Notification Point - A preselected step established by Quality Control in any procedure or work process which identifies a discretionary inspection point which may be waived based on the availability of Quality Control personnel and other activities of a more critical nature.

Nuclear Fuel - Uranium ore, converted uranium, enriched uranium, fabricated fuel, pins and assemblies.

Package - A wrapping or container including its contents of material or equipment.

Part - An item which has work performed on it and which is attached to and becomes part of a component before completion of the component.

Plant Modification - A planned physical change to a plant structure, system or component as described in design documents.

Preventive Maintenance - Preventive, periodic and planned maintenance actions taken to maintain a piece of equipment within design operating conditions and extend its life and is performed prior to equipment failure. This includes technical specification surveillances, inservice inspections and other regulatory forms of preventive maintenance.

Procedure - A document that specifies or describes how an activity is to be performed. It may include methods to be employed, equipment, or materials to be used and sequence of operations.

Procurement - Interdisciplinary function by which equipment, materials, or services are acquired.

Procurement Documents - Purchase requisitions, purchase orders, drawings, contracts, specifications or instructions used to define requirements for purchase. (ANSI N45.2.13)

Proposal - A document, which describes the equipment, material, or services which the vendor, proposes to furnish. The proposal should include commercial information and a statement of any exceptions to the provisions of the inquiry.

Purchase Order (or Contract) - A document authorizing a vendor to provide equipment, material or services in accordance with the terms and conditions established in the purchase order or contract.

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Qualification (Personnel) - The characteristics or abilities gained through training or experience or both that enable an individual to perform a required function.

Qualified Procedure - A procedure which incorporates all applicable codes and standards, manufacturer's parameters, and engineering specifications and has been proven adequate for its intended purpose.

Quality Assurance - All those planned or systematic actions necessary to provide adequate confidence that an item or facility will perform satisfactorily in service.

Quality Control - Those quality assurance actions, which provide a means to control and measure the characteristics of an item, process, or facility to, established requirements.

Quality-Related - Those activities or items required to be included in the Operations QA program by the UFSAR, Federal Codes, other regulatory licensing requirements or management directive. The term quality-related encompasses safety-related and important to safety activities or items.

Quality-Related Item - A structure, system, or component identified in UFSAR Section 3.2 as requiring applicable quality oversight during the operations of Units 1 & 2, ISFSI, and DCSS.

Receiving - Taking delivery of an item at a designated location.

Records - Those records, physical or electronic media, which furnish documentary evidence of the quality of items and of activities affecting quality. A document is considered a quality assurance record when the document has been completed.

Reference Standard - Standards (that is, primary, secondary and working standards, where appropriate) used in a calibration program. These standards establish the basic accuracy limits for that program.

Repair - The process of restoring a nonconforming characteristic to a condition such that the capability of an item to function reliably and safety is unimpaired even though the item still may not conform to the original statement.

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Replacements - Spare and renewal components, appurtenances and subassemblies or parts of a component or system. Replacements also include the addition of components but do not include the addition of complete systems.

Review - A deliberately critical examination, including observation of plant operation, evaluation of audit results, procedures, certain contemplated actions, and after-the-fact investigations of abnormal conditions.

Rework - The process by which a nonconforming item is made to conform to a prior specified requirement by completion, remachining, reassembling, or other corrective means.

Safety-Related - Those plant features necessary to assure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safely shutdown condition, or the capability to prevent or mitigate the consequences of accidents which could result in off-site exposures comparable to the guideline exposure of NRC Regulations 10CFR100.

Special Process - A process, the results of which are highly dependent on the control of the process or the skill of the operators, or both, and in which the specified quality cannot be readily determined by inspection or test of the product.

Specification - A concise statement of a set of requirements to be satisfied by a product, material, or process indicating, whenever appropriate, the procedure by means of which it may be determined whether the requirements given are satisfied. (Specifications may also be used to describe technical services to be provided.)

Standard - The result of a particular standardization effort approved by a recognized authority.

Stop Work - The suspension of an activity.

Storage - The act of holding items at the construction site or in an area other than its permanent location in the plant.

Surveillance/Quality Performance Monitoring - The act of observing real time activities and/or reviewing documentation to verify conformance with specified requirements and industry good practices, and to evaluate their adequacy and effectiveness.

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Surveillance Testing - Periodic testing to verify that safety-related structures, systems, and components continue to function or are in a state of readiness to perform their function.

Survey - An activity performed in a vendor's facility to determine the adequacy and implementation of a vendor's quality assurance program. This activity is normally done prior to award of a purchase order.

System - A group of subsystems united by some interaction or interdependence, performing duties but functioning as a single unit.

Testing - The determination or verification of the capability of an item to meet specified requirements by subjecting the item to a set of physical, chemical, environmental, or operating conditions.

Use-as-is - A disposition which may be imposed for a nonconformance when it can be established that the discrepancy will result in no adverse conditions and that the item under consideration will continue to meet all engineering functional requirements including performance, maintainability, fit, and safety.

Verification - An act of confirming, substantiating, and assuring that an activity or condition has been implemented in conformance with the specified requirements.



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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 (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 Units 1 & 2, Dry Cask Storage System (DCSS), and Independent Spent Fuel Storage Installation (ISFSI).

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## 3.0 DEFINITIONS

- 3.1 None

## 4.0 REFERENCES

- 4.1 None

## 5.0 RESPONSIBILITIES

- 5.1 The STPNOC organization includes the Chief Nuclear Officer; Vice President, Shared Services & Assistant to the Chief Executive Officer; and Vice President, Projects, Outages & Information Technology. The senior management of these groups report to the President and Chief Executive Officer.
- 5.2 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. The President and Chief Executive Officer shall designate those members of senior management to function as the Senior Management Team.
- 5.3 The Chief Nuclear Officer is responsible for implementing quality program requirements applicable to generation, engineering & regulatory affairs, plant protection (emergency response, plant protection support, security, access authorization) and quality. The senior management of these functions report to the Chief Nuclear Officer.

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5.3.1 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, organizational effectiveness, and training and knowledge transfer. The senior management of these functions report to the Vice President, Generation.

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5.3.1.1 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, develops detailed procedures and instructions for testing, operation, modification, and maintenance of the STP.

5.3.1.2 The Plant General Manager is responsible for implementing quality program requirements applicable to the following functions including: operations, maintenance, chemistry, health physics, and work control. The management of these functions report to the Plant General Manager.

5.3.2 The General Manager, Engineering & Regulatory Affairs is responsible for implementing quality program requirements applicable to the following functions: design engineering, environmental, nuclear fuels & analysis (includes risk management), regulatory affairs, and site engineering (systems engineering, maintenance engineering, testing/programs engineering). The management of these functions report to the General Manager, Engineering & Regulatory Affairs.

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5.3.3 The Manager, Quality has the independence to conduct Quality activities without undue pressure of cost or schedule and is responsible for the following:

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 OQAP and revisions thereto;

Identify, initiate, recommend, or provide solutions to quality-related problems and verify the implementation and effectiveness of the solutions; and

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Independent oversight activities, including audits, independent assessments, evaluations, surveillances, performance monitoring, inspections, independent oversight of NDE examinations, vendor oversight, and administration of organizational unit independent review activities.

- 5.3.4 The Chief Nuclear Officer and the Manager, Quality, at their discretion, have unfettered access to the President and Chief Executive Officer and the Board of Directors.
- 5.3.5 The Chief Nuclear Officer and the Manager, Quality have 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.
- 5.3.6 The Manager, Nuclear Fuels & Analysis is responsible for implementing quality program requirements applicable to the following functions: reactor engineering, core design, reload safety analysis, nuclear fuel performance and supply, risk management (probabilistic risk assessment and risk-informed applications).

Activities related to the Comprehensive Risk Management Program include 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.

- 5.4 The Vice President, Shared Services and Assistant to the CEO is responsible for implementing quality program requirements applicable to the following functions: fitness for duty program and records management system. The senior management of these functions report to the Vice President Shared Services and Assistant to the CEO.
- 5.5 The Vice President, Projects, Outages & Information Technology is responsible for implementing quality program requirements applicable to the following functions: outages, projects, contracts & procurement, independent spent fuel storage installation and dry cask storage system, and information technology. The senior management of these functions report to the Vice President, Projects, Outages & Information Technology.

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5.5.1 The General Manager, Alliances, Projects & Outages is responsible for implementing quality program requirements applicable to the following functions: strategic projects, projects, outage management, independent spent fuel storage installation and dry cask storage system, and major projects. The management of these functions report to the General Manager, Alliances, Projects & Outages.

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5.5.2 The General Manager, Support & Technology is responsible for implementing quality program requirements applicable to the following functions: information technology and support & technology. The management of these functions report to the General Manager, Support & Technology.

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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 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 for Units 1 & 2 are further described in STP UFSAR Chapter 13.1.

## 7.0 DOCUMENTATION

7.1 None

## 8.0 ATTACHMENTS

8.1 None

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## 1.0 PURPOSE

- 1.1 The purpose of this chapter is to define criteria and establish administrative controls for implementation of the Quality Assurance (QA) Program for the South Texas Project (STP).

## 2.0 SCOPE

- 2.1 The QA Program is implemented and controlled in accordance with the Operations Quality Assurance Plan (OQAP) and is applicable to structures, systems, and components (SSCs) to an extent consistent with their importance to safety, and complies with the requirements of 10CFR50, Appendix B and other program commitments as appropriate. QA-075
- 2.2 The QA Program will also extend, as applicable and/or determined by STP management, to programs including 10CFR71, Subpart H (except design and fabrication of NRC certified radioactive waste shipping casks), 10CFR72, Subpart G (those features, activities, and SSCs of an Independent Spent Fuel Storage Installation (ISFSI), Dry Cask Storage System (DCSS), or a transportation package important to safety that maintain the conditions required to prevent damage to a container during handling and storage, or provide reasonable assurance that radioactive material can be received, handled, stored, and retrieved without undue risk to the health and safety of the public), ASME Boiler and Pressure Vessel Code, Sections III, V, IX, and XI; and to quality-related areas as defined herein including the Fire Protection Program, Emergency Plan, Radiological Environmental Monitoring Program, Radwaste Management Program, Computer Program Verification and Control, Seismic and Environmental Equipment Qualification Programs, Radiation Protection Program, and Station Blackout (SBO) systems and equipment. QA-075
- 2.3 Additional quality requirements specific to ISFSI and DCSS are located in Reference 4.9. QA-075

## 3.0 DEFINITIONS

- 3.1 Comprehensive Risk Management - A process by which the change in risk to station personnel, the public's health and safety are evaluated as a result of changes in commitments, processes, activities, and human and equipment performance.

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- 3.2 Graded Quality Assurance - The process by which risk-based methodology [i.e., Probabilistic Safety Assessment (PSA)] and deterministic and performance-based information analyses are combined to establish appropriate levels of programmatic controls for SSCs and appropriate levels of first line and independent oversight needed to provide the necessary assurance that SSCs will operate safely.
- 3.3 Full program controls - The highest levels of controls and oversight applied to safety-related SSCs categorized as High Safety Significant (HSS), as prescribed in Table I to this chapter and throughout individual OQAP chapters.
- 3.4 Basic program controls - Levels of control and oversight, lower than in the Full Program, applied to safety-related SSCs categorized as Medium Safety Significant (MSS), as prescribed in Table I to this chapter and throughout individual OQAP chapters.
- 3.5 Targeted program controls - Selected program controls applied to certain non-safety-related SSCs categorized as either HSS or MSS.
- 3.6 Limited program controls - Limited controls applied to safety-related SSCs categorized as either Low Safety Significant (LSS) or Non-Risk Significant (NRS).
- 3.7 Graded Approach to Quality - Used as required by 10CFR72 to apply to all activities affecting the important to safety functions of those SSCs of the ISFSI or DCSS that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The identification of important to safety SSCs for each type of DCSS used at STP is contained within its own unique 10CFR72 (Certificate Holder's) Final Safety Analysis Report (FSAR) (as updated), and Certificate of Compliance (C of C).

#### 4.0 REFERENCES

- 4.1 10CFR50, Appendix B
- 4.2 10CFR71, Subpart H
- 4.3 ASME B&PV Code
- 4.4 OQAP Chapter 14.0, Records Control
- 4.5 10CFR50.63, Loss of All Alternating Current Power

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4.6 10CFR50.54(a)

4.7 Updated Final Safety Analysis Report

4.8 Safety Evaluation on Exemption Requests from Special Treatment Requirements of 10 CFR Parts 21, 50, and 100 (TAC NOS. MA6057 AND MA6058)

4.9 OQAP Chapter 20.0, Dry Cask Storage System and Independent Spent Fuel Storage Installation

4.10 10CFR72, Subpart G

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## 5.0 REQUIREMENTS

5.1 General Program Requirements

5.1.1 The OQAP shall be prepared and maintained to prescribe the STP QA Program. The OQAP reflects the quality program policies to be implemented. The OQAP describes the organization and responsibilities for attainment of quality objectives and verification of conformance to established requirements. The QA Program shall be in effect throughout the operating life of the STP (Units 1 & 2) and the ISFSI.

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5.1.2 The President and Chief Executive Officer has overall responsibility for quality assurance. The Chief Nuclear Officer is responsible for the development and maintenance of the OQAP.

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5.1.3 The operations phase of the STP includes design, procurement, fabrication, repair, testing, operation, maintenance, refueling, inspection, independent oversight, modification, and other activities as discussed Table I to this chapter and throughout the OQAP. STP and its vendors are required, as appropriate, to comply with the criteria established by 10CFR50, Section 50.55a; 10CFR50, Appendix A, General Design Criterion (GDC) 1; 10CFR50, Appendix B, 10CFR72, Subpart G, and 10CFR71, Sub-Part H (except design and fabrication of NRC certified radioactive waste shipping casks). These regulations are not applicable to LSS and NRS safety-related components, to the extent that the Nuclear Regulatory Commission has granted STP an exemption from the regulations as described in Reference 4.8.

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STP will implement, as specified, the Regulatory Guides (RG) and implementing American National Standards Institute (ANSI) standards contained in Table I of this chapter.

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5.1.4 STP shall maintain the OQAP as an effective and meaningful document to provide programmatic direction for the station. Changes to the OQAP shall be accomplished as prescribed by 10CFR50.54(a).

## 5.2 Organizational Independence

5.2.1 The reporting arrangement utilized by the Quality organization ensures that those personnel performing independent oversight have the organizational freedom to:

5.2.1.1 Identify quality problems.

5.2.1.2 Initiate, recommend, or provide solutions.

5.2.1.3 Verify implementation of solutions.

5.2.2 Personnel verifying compliance with quality requirements do not have direct responsibility for the performance of or directly supervise the activity being verified.

## 5.3 Graded Quality Assurance

5.3.1 Graded Quality Assurance (GQA) is fundamental to the STP QA Program. It is described in more detail in the implementing procedure for the STP Comprehensive Risk Management (CRM) Program.

5.3.2 GQA is a process by which risk-based methodology [i.e., Probabilistic Safety Assessment (PSA)], deterministic insights, and performance-based information are combined and analyzed to determine what levels of programmatic controls are needed for structures, systems, and components (SSCs) and what levels of first line and independent oversight are needed to provide assurance that items will operate safely and activities are accomplished as prescribed.

5.3.3 Selected systems are evaluated, at the component level, by a cross-discipline Expert Panel comprised of high level station management. Initial evaluations are performed by the Working Group.



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- 5.3.4 These recommendations are developed in consideration of the risk significance of system functions, components' contribution to core damage frequency and large early release frequency, components' critical attributes (needed to support risk significant system functions), performance, regulatory/QA requirements, and other deterministic considerations as prescribed in the Comprehensive Risk Management procedures.
- 5.3.5 Program control recommendations are developed by the Working Group and ultimately approved by the Expert Panel and forwarded to the site for implementation. Controls are implemented in four graded applications (i.e., "Full", "Basic", "Targeted", and "Limited").
- 5.3.6 "Full" program controls are applied to safety-related SSCs categorized as HSS. These "Full" levels of controls and oversight are designed to provide a high degree of confidence that SSCs perform safely and activities are performed as expected. Table I to the OQAP chapter prescribes the program commitments applicable to "Full" program activities.
- 5.3.7 "Basic" program controls are applied to safety-related SSCs categorized as MSS. These are lower levels of control and oversight, designed to maintain/preserve those identified critical attributes of SSCs needed to support risk significant system functions. These controls are intended to reflect economical and efficient business practices. Table I to this OQAP chapter prescribes the program commitments applicable to "Basic" program activities.
- 5.3.8 "Limited" program controls are applied to safety-related SSCs categorized as either LSS or NRS. Only specific program controls related to the activities listed in the following subparagraphs are applicable to these SSCs. The other chapters of the OQAP are not applicable to safety-related LSS and NRS SSCs. Instead, the treatment processes applicable to these SSCs are described in the Updated Final Safety Analysis Report Section 13.7.3.3 and implementing procedures:
- 5.3.8.1 Those elements in Chapter 1.0 that are needed to implement and control activities described above;
  - 5.3.8.2 Applicable requirements in this Chapter;
  - 5.3.8.3 Modification/design activities as described in Chapter 6.0; and

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5.3.8.4 Corrective action as described in Chapter 13.0.

5.3.9 “Targeted” program controls are applied to non-safety related SSCs, for which 10CFR50, Appendix B is not applicable, categorized as HSS or MSS . Specific program controls consistent with applicable portions of the "full" and "basic" program controls are applied to those items in a selected manner, "targeted" at those characteristics or critical attributes that render the SSC risk significant.

5.3.10 Safety-related components that are highly reliable, yet whose failure would result in a significant increase in risk, will receive Full program coverage, or will be evaluated based on their risk significance to ensure that Full program controls are applied to their critical attributes.

5.3.11 SSCs governed by the OQAP shall retain their current program coverage until such time as prescribed risk-informed, performance-based analyses are completed and approved, and they are placed into the graded program categories (i.e., “Full”, “Basic”, “Targeted”, or “Limited”) as appropriate.

5.3.12 A vital element of the GQA program is the "feedback" loop. On a periodic basis, and as prescribed in the Comprehensive Risk Management procedure, the GQA Working Group and Expert Panel shall review any changes to the PSA information and performance/operating experience that could result in recategorization of an SSC. These reviews are also used to assess the effectiveness and appropriateness of in-place quality program controls. Adjustments shall be made as determined necessary.

#### 5.4 Delegation of QA Functions

5.4.1 The OQAP may be executed in whole or part by subcontract personnel. However, STP will retain responsibility for the total quality assurance program, and Quality organization personnel will perform appropriate oversight activities of subcontracted activities.

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## 5.5 Identification of Safety Significant Structures, Systems, and Components

5.5.1 The program described herein is applied to activities affecting the safety functions of those structures, systems, and components which prevent, or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The structures, systems, and components controlled are listed in UFSAR Section 3.2, along with their associated fire protection systems. UFSAR Section 3.2 also identifies those structures, systems, and components which may not represent a safety significant/risk important concern but to which the STP OQAP is applied.

5.5.2 The fire protection QA Program is part of the overall STP Operations QA Program. Fire protection QA Program criteria are implemented as part of the Operations QA Program.

5.5.3 Expendable or consumable items necessary for the functional performance of structures, systems, and components are subjected to quality assurance requirements as specified in written procedures. These procedures include provisions for review and control in accordance with industry standards and specifications.

## 5.6 QA Program Documents

5.6.1 The QA Program shall be implemented with documented instructions, procedures, and drawings which include appropriate quantitative and qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. Procedures shall include the control of the sequence of required inspections, tests, and other operations when important to quality. To change these controls, the individual procedure must be changed and shall require the same level of review and approval given to the original procedure. Such instructions, procedures, and drawings are reviewed and approved for compliance with requirements appropriate to their safety significance by individuals qualified to do so.

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## 5.7 Personnel Indoctrination and Training

5.7.1 General indoctrination and training programs shall be provided for site personnel to assure that they are knowledgeable regarding quality programs and requirements. The training requirements for STP personnel are described in UFSAR Section 13.2. Personnel performing complex, unusual, or potentially hazardous work shall be instructed in special indoctrination or briefing sessions. Emphasis shall be on special requirements for safety of personnel, radiation control and protection, unique features of equipment and systems, operating constraints, and control requirements in effect during performance of work. Where required by codes and standards, personnel are trained, qualified, and certified according to written procedures in the principles and techniques of performing specific activities.

## 5.8 Policies and Goals

5.8.1 STP policy is to assure that the design, procurement, construction, testing, and operation of the STP are in conformance with specifications, procedures, codes, commitments and Nuclear Regulatory Commission (NRC) regulations to the extent not exempted. The responsibility of each organization supporting the STP is to ensure that the requirements stated in this QA Program are incorporated into procedures. Adherence to those procedures is mandatory for all STP organizations and contractors or vendors providing items or services covered by the QA Program.

5.8.2 The OQAP identifies activities and establishes requirements for procedures which identify, report, and verify the resolution of quality problems. The implementing procedures call for the resolution of quality problems at the lowest possible authorized level. However, if a dispute is encountered in the resolution of a quality problem which cannot be resolved at lower levels, the Chief Nuclear Officer or Manager, Quality shall present the problem to the President and Chief Executive Officer for resolution.

## 5.9 Control of Activities

5.9.1 The OQAP requires Quality department review and/or approval of procedures which control selected activities. These procedures shall require the use of the proper equipment, completion of prerequisites for starting an activity, and suitable environment for performing the activity. Procedures will comply with the appropriate standards.

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5.9.2 STP personnel attend planning, scheduling, and status meetings as necessary to assure adequate quality coverage and program application exists.

#### 5.10 Management Review

5.10.1 The implementation of both line and QQAP requirements shall be verified through independent oversight activities. The Quality organization shall conduct independent oversight activities of the operating plant, DCSS, ISFSI and of the interfacing organizations' activities.

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5.10.2 Independent oversight of the implementation of the QQAP is conducted under the cognizance of the Senior Management Team and results are transmitted to appropriate line and senior management, including the President and Chief Executive Officer and the Chief Nuclear Officer for review and/or action.

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5.10.3 STP may use the services of architect-engineer firms, Nuclear Steam Supply System (NSSS) suppliers, fuel fabricators, constructors, and others which provide or augment STP efforts during operations. As applicable, the QA programs of such contractors or consultants shall be subject to review, evaluation, and acceptance by the Quality organization before initiation of activities affected by the program.

#### 5.11 Computer Code Programs

5.11.1 The development, maintenance, and use of computer code programs will be controlled. Prior to use of a computer code program, the appropriateness of the program shall be verified. In addition, all such programs shall be appropriately certified for use.

### 6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.4.

### 7.0 ATTACHMENTS

7.1 Table I - Program Commitments

TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
R.G. 1.8, rev. 1 (9/75)	No exceptions taken.	No exceptions taken.
ANSI N18.1, 1971	4.2.2-The Operations Manager requirements regarding holding a Senior Reactor Operator license are met by the Unit Operations Managers.	Same as full.
R.G. 1.28, rev. 0 (6/72)	This R.G. is not applicable to operations phase activities.	Same as full.
ANSI N45.2, 1971	This standard is not applicable to operations phase activities.	Same as full.
R.G. 1.33, rev. 2 (2/78)	C.2 - the specific revisions of the listed standards to which STP is committed are in this table and are not necessarily the "latest" revision.	Same as full.
	C.4 – Chapter 15.0 of the STP OQAP describes the audit program at STP that meets the intent of R.G. 1.33, rev. 2, position C.4 regarding frequency of audits	Same as full.
	C.4.a.b.c – STP performs these audits in accordance with a nominal biennial frequency.	Same as full.
ANSI N18.7 – 1976/ANS 3.2	3.4.2 – refer to R.G. 1.8 regarding Operations Manager holding a Senior Reactor Operator license.	Same as full.
		3.4.2 refer to R.G. 1.58 regarding use of personnel not qualified in accordance with ANSI N45.2.6.
	4.5 – refer to R.G. 1.33 coverage regarding audit frequency.	Same as full.
	5.2.6 (5th paragraph) – independent verification may be concurrent with (same time as) work performance.	Same as full.

TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N18.7/ANS 3.2 (cont'd)	<p>5.2.7 (1st paragraph) – STP will use current approved design bases as opposed to original design bases.</p> <p>5.2.7.1 (5th paragraph) – STP takes exception to use of the word “promptly” with regard to determining, evaluating and recording the causes of malfunctions. The STP Corrective Action Program includes the elements with regard to timeliness of action associated with causal analyses.</p> <p>5.2.15 (4th paragraph) – Chapter 8.0 of the OQAP describes the requirements for control and issuance of documents, which meets the intent of R.G. 1.33, rev. 2. The intent of the biennial review is accomplished by other controls that assure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, regulatory requirements, industry experience and other conditions that may impact plant procedures.</p>	<p>Same as full.</p> <p>5.2.7 – STP will perform inspection as deemed necessary, based on the relative complexity of the work.</p> <p>Same as full.</p> <p>5.2.7.2 – refer to table coverage of ANSI N45.2.11, 1974.</p> <p>5.2.13 (1st paragraph) – refer to table coverage of ANSI N45.2.13, 1976.</p> <p>5.2.13.1 (1st paragraph) – refer to table coverage of ANSI N45.2, 1971.</p> <p>5.2.13.4 (5th paragraph) – refer to table coverage of ANSI N45.2.2, 1972.</p> <p>Same as full.</p>

TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N18.7/ANS 3.2 (cont'd)		5.2.17 (3rd paragraph) – STP may not implement the requirement for conduct of inspections in a manner similar to that associated with construction phase activities (i.e., regarding use of personnel not qualified to ANSI N45.2.6)
R.G. 1.38, rev. 2 (5/77)	No exceptions taken.	No exceptions taken.
ANSI N45.2.2, 1972	2.4 – Audit personnel are qualified in accordance with STP's commitment to R.G. 1.146/ANSI 45.2.23.	Same as full.
		2.4 – Offsite oversight of vendors of items in the Basic category will only be performed as deemed necessary.
	5.2.1 - These activities do not constitute an "inspection" as defined in ANSI/ASME NQA-1, 1983, Supplement S-1, Terms and Definitions. Therefore, the requirements for qualification to ANSI N45.2.6 as stated in Section 2.4 do not apply to personnel performing these activities.	Same as Full
R.G. 1.58, rev. 1 (9/80)	C.2 – STP is committed to ASNT-TC-1A, 1980. STP treats the recommendation ("should") of the 1980 edition as requirements ("shall").	Same as full.
ANSI N45.2.6, 1978		1.2 (1st paragraph) – with the exception of receipt inspection, personnel may perform inspections, examinations and tests provided they are experienced, task qualified journeymen, or supervisors, who did not perform or directly supervised the activity being inspected, examined or



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R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.6, 1978 (cont'd)		tested. These individuals shall also receive training to the applicable inspection procedure, processes, methods in accordance with a Quality approved training program; and Quality will provide periodic oversight of the inspection activities.
	1.2 (3rd paragraph) – refer to table coverage of R.G. 1.28.	Same as full.
	1.4.4 – refer to table coverage of R.G. 1.74/ANSI N45.2.10.	Same as full.
	Personnel performing the activities stated in ANSI N45.2.2, Section 5.2.1 do not require qualification to this Standard. (see exception to ANSI N45.2.2)	Same as Full
R.G. 1.64, rev. 2 (6/76)	No exceptions taken.	C.2 – STP may implement the requirement regarding design verification as prescribed in ANSI N45.2.11, 1974, 6.1, second paragraph/second sentence, as opposed to R.G. wording.
ASNI N45.2.11, 1974	No exceptions taken.	3.2 (1 <sup>st</sup> paragraph) – STP will require personnel to consider items 1 through 28, but a documented checklist may not be required.

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R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.11, 1974 (Con't.)		6.3 – Verification and checking of design may be accomplished through supervisory or management review/approval as provided for in 6.1. Personnel will be required to consider items 1 through 19, but a documented checklist may not be required.
R.G. 1.74 (2/74)	Not applicable to STP. STP uses ANSI/ASME NQA-1-1983 for Quality Assurance Terms and Definitions.	Same as full.
ANSI N45.2.10, 1973	Same as R.G. 1.74 above.	Same as full.
R.G. 1.88, rev. 2 (10/76)	No exceptions taken.	Same as full.
ANSI N45.2.9, 1974	Section 5.6 – supplement the provisions of this section by providing for alternate temporary storage of records. Allow the use of 1-hour fire rated cabinets to store records that are awaiting processing (e.g., processing into Optical Disk Storage). Storage of these records in 1-hour fire rated cabinets will be controlled by procedure which specify a maximum allowable time limit. Cabinets housing these records shall be controlled for access and shall be located in an area protected by sprinklers.	Same as full.
R.G. 1.123, rev. 1 (7/77)	C.6.b.and e. – The referenced section of ANSI N45.2.13 will be implemented as written.	
ANSI N45.2.13, 1976	Various sections refer to ANSI N45.2. Refer to table coverage of R.G. 1.28 and ANSI N45.2.	Same as full.

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PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.13, 1976 (cont'd)	<p>3.2.3 – When purchasing commercial-grade calibration services from calibration laboratories accredited by a nationally-recognized accrediting body, the procurement documents are not required to impose a quality assurance program consistent with 10CFR50, Appendix B. In such cases, accreditation may be accepted in lieu of the Purchaser imposing a QA Program consistent with 10CFR50, Appendix B, provided all of the following are met:</p> <p>1) The accreditation is to ANSI/ISO/IEC 17025</p> <p>2) The accrediting body is either the National Voluntary Laboratory Accrediting Program (NVLAP) administered by the National Institute of Standards and Technology (NIST) or American Association for Laboratory Accreditation (A2LA). The A2LA accreditation is recognized by NVLAP through the International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement (MRA).</p> <p>3) The published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties. This requires the supplier to provide a measurement of collective uncertainty and obviates the need to impose the four-to-one ratio requirement discussed in NIST Information Report (NISTIR) 6989.</p> <p>4) The purchase documents impose additional technical and administrative requirements, as necessary, to satisfy STPNOC QA Program and technical requirements. This requires the calibration certificate/report include identification of the laboratory equipment/standards used.</p> <p>5) Purchase documents require reporting as-found calibration data when calibrated items are found to be out-of-tolerance.</p>	Same as full
	5.3 and 5.4 – Provision are established for, in special cases and with management approval, completion of these activities after award of contract.	Same as full.
	9.0 – This section will be implemented based on the scope, complexity and safety significance of the items being procured.	Same as full.

TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.13, 1976 (cont'd)		10.3.1 – This section will only be implemented as deemed necessary.
		12 – This section will only be implemented as deemed necessary for audits of suppliers.
R.G. 1.144, rev. 1 (9/80)	C.1 – refer to table coverage of R.G. 1.28 and ANSI N45.2.	Same as full.
	C.3a(1) – refer to table coverage of R.G. 1.33 regarding audit frequency.	Same as full.
	<p>C.3.b(2) – When purchasing commercial-grade calibration services from calibration laboratories accredited by a nationally-recognized accrediting body, the accreditation process and accrediting body may be credited with carrying out a portion of the Purchaser's duties of verifying acceptability and effective implementation of the calibration service supplier's quality assurance program.</p> <p>In lieu of performing an audit, accepting an audit by another licensee, or performing a commercial-grade survey, a documented review of the supplier's accreditation shall be performed by the Purchaser. This review shall include, at a minimum, verification of the following:</p> <ol style="list-style-type: none"> <li>1) The accreditation is to ANSI/ISO/IEC 17025</li> <li>2) The accrediting body is either NVLAP or A2LA. The A2LA accreditation is recognized by NVLAP through the ILAC MRA.</li> <li>3) The published scope of accreditation for the calibration laboratory covers the needed measurement parameters, ranges, and uncertainties. This requires the supplier to provide a measurement of collective uncertainty and obviates the need to impose the four-to-one ratio requirements discussed in NISTIR 6989.</li> </ol> <p>The licensee is responsible for ensuring that the procured services are within the accredited scope of the NVLAP and A2LA certificates.</p>	<p>Same as full for commercial-grade calibration services</p> <p>STP will audit vendors only as deemed necessary. STP will perform biennial evaluations.</p>

TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.12, 1977	No exceptions taken.	STP will audit vendors only as deemed necessary. These audits will be conducted as unplanned/unscheduled audits.
R.G. 1.146, rev. 0 (8/80)	C.1 – refer to table coverage of R.G. 1.28 and ANSI N45.2. Refer to table coverage of R.G. 1.74 and ANSI N45.2.10	Same as full.
ANSI N45.2.23, 1978	1.2 – refer to table coverage of R.G. 1.28.	Same as full.
	1.4 – refer to table coverage of R.G. 1.74.	Same as full.
	2.21 – refer to table coverage of R.G. 1.28.	Same as full.
	2.3.3.1 – refer to table coverage of R.G. 1.28.	Same as full.
	2.3.4 - In lieu of the requirements of section 2.3.4 of ANSI N45.2.23-1978 the following alternative is acceptable:  Prospective lead auditors shall demonstrate their ability to properly implement the audit process and effectively lead an audit team. This demonstration process will be described in implementing procedures and will include the evaluation and documentation of the results of the demonstration. Regardless of the methods used for the demonstration, the prospective lead auditor is required to participate in at least one nuclear quality assurance audit within the year preceding the individual's effective date of qualification. Upon successful demonstration of the ability to effectively implement the audit process and effectively lead audits, and having met the other provisions of Section 2.3 of ANSI N45.2.23-1978, the individual may be certified as being qualified to lead audits.	Same as full

TABLE I  
PROGRAM COMMITMENTS

For Regulatory Guides addressed by the table, and unless specific clarification or exception is indicated, STP will implement the Regulatory Guide positions, including recommendations.

For ANSI Standards addressed by this table, and unless specific clarification or exception is indicated, STP will treat ANSI requirements (i.e., “shall”) as such – except in instances where the standard itself provides options or requires a graded approach – this notwithstanding the general applicability statements found in many standards (i.e., section 1.0)

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>CONDUCT OF OPERATION</b>	<b>NUMBER</b>  <b>Chapter</b> <b>3.0</b>	<b>REV.</b> <b>NO.</b>  <b>8</b>
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## 1.0 PURPOSE

- 1.1 The purpose of this chapter is to prescribe the requirements and responsibilities for the conduct of plant (Units 1 & 2), Dry Cask Storage System (DCSS), and the Independent Spent Fuel Storage Installation (ISFSI) operations at the South Texas Project (STP).

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## 2.0 SCOPE

- 2.1 This chapter applies to all personnel performing activities associated with structures, systems, and components during the operations phase of the STP Units 1 & 2, DCSS, and ISFSI.

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## 3.0 DEFINITIONS

- 3.1 None

## 4.0 REFERENCES

- 4.1 STP Technical Specifications
- 4.2 OQAP Chapter 2.0, Table I
- 4.3 UFSAR 13.5.2.1 paragraph 4, Emergency Operating Procedures
- 4.4 OQAP Chapter 14.0, Records Control
- 4.5 10CFR100, Reactor Site Criteria
- 4.6 OQAP Chapter 19.0

## 5.0 REQUIREMENTS

- 5.1 Activities affecting structures, systems, and components shall be conducted in accordance with written, approved procedures.
- 5.1.1 Procedural compliance and requirements for procedure use shall be prescribed in writing. Measures shall be established by which temporary changes to approved procedures can be made, including the designation of a person(s) authorized to approve such changes. Temporary changes which clearly do not change the intent of the approved procedure shall be made in accordance with Reference 4.6.

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- 5.1.2 Guidance shall be provided to identify the manner in which procedures are to be implemented. Examples of such guidance include identification of those tasks that require:
- 5.1.2.1 The written procedure to be present and followed step by step while the task is being performed.
  - 5.1.2.2 The operator to have committed the procedural steps to memory.
  - 5.1.2.3 Verification of completion of significant steps by initial or signatures on checkoff lists.
- 5.1.3 The types of procedures that shall be present and referred to directly are those developed for extensive or complex tasks where reliance on memory cannot be trusted (e.g., reactor startup, tasks which are infrequently performed, and tasks in which operations must be performed in a specified sequence). Necessary data shall be recorded as the task is performed.
- 5.1.4 Temporary procedures may be issued to direct operations during testing, refueling, maintenance, and modifications; to provide guidance in unusual situations not within the scope of the normal procedures; and to ensure orderly and uniform operations for short periods when the plant, a system, or a component is performing in a manner not covered by existing detailed procedures or has been modified or extended in such a manner that portions of existing procedures do not apply. Temporary procedures shall include designation of the period of time during which the procedures are to be used and shall be subject to the same review and approval process as permanent procedures.
- 5.1.5 Emergency Operating Procedures shall be prepared in accordance with Reference 4.3.



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## 5.2 Operating Orders

- 5.2.1 A mechanism shall be provided for issuing management instructions which have short-term applicability and which require dissemination. Such instructions, sometimes referred to as special orders, operating orders, or standing orders should encompass special operations, job-turnover and relief, data taking, publications and their distribution, plotting process parameters, personnel actions, or other similar matters. These shall not be used in lieu of, or to modify existing procedures.
- 5.2.2 A mechanism shall be provided for management to issue information and direction to the oncoming evening and night shifts. These night orders shall be signed and dated by a responsible supervisor. These shall not be used in lieu of, or to modify existing procedures.

## 5.3 Shift Operations

- 5.3.1 The responsibilities and authorities of Licensed Operations Personnel shall be specified in plant procedures. These procedures shall include responsibilities and authorities for startup, shutdown, and operation of the reactor and associated equipment, for observance of instrumentation and for implementation of the Emergency Plan (Refer to Reference 4.1). The cognizant Shift Manager shall be responsible for maintaining sufficient knowledge of system or equipment tests or inspections in progress to control the overall plant operation. Personnel performing tests or inspections shall keep the Shift Manager or Control Room Operator advised of the current status of tests or inspections in progress which may affect plant operations.
- 5.3.2 When operating during normal, abnormal or emergency conditions, the operator shall rely on plant instrumentation, unless proven to be incorrect. When operating parameters are not as expected, the unit shall be placed in a known safe condition. A manual reactor trip or safety system actuation shall be initiated if system parameters for reactor trip or safety systems exceed their actuation setpoint and automatic actuation does not occur.
- 5.3.3 In the event of an emergency not covered by an approved procedure, operations personnel shall take action to minimize personnel injury, damage to the facility, and maintain offsite exposures within the requirements of 10CFR100.

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#### 5.4 Equipment Control

- 5.4.1 Procedures shall provide for control of equipment as necessary to maintain personnel and reactor safety and to avoid unauthorized operation of equipment. These procedures shall require control measures such as locking or tagging to secure and identify the control status of equipment, and responsibility and action necessary for isolating the equipment. These procedures shall require independent verifications where appropriate to ensure these measures have been correctly implemented.
- 5.4.2 Procedures shall provide for the identification of required tests and inspections and provide documentary evidence that the tests and inspections have been performed prior to considering the affected system operable.
- 5.4.3 Permission to release equipment or systems for maintenance shall be granted by designated operations personnel. These operations personnel shall verify before release that, based on a review of the plant technical specifications, the system or component can be released for the time period that it may be out of service. The requirements for equipment operability stated in Reference 4.1 shall be met.

#### 6.0 DOCUMENTATION

- 6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.4.

#### 7.0 ATTACHMENTS

- 7.1 None

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>QUALIFICATION, TRAINING AND CERTIFICATION OF PERSONNEL</b>	<b>NUMBER</b> <b>Chapter</b> <b>4.0</b>	<b>REV.</b> <b>NO.</b> <b>6</b>
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## 1.0 PURPOSE

- 1.1 The purpose of this chapter is to establish requirements for qualification, training, and certification of personnel whose activities may affect structures, systems, components and activities at the South Texas Project (STP).

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## 2.0 SCOPE

- 2.1 This chapter provides for the qualification, training, and certification of personnel performing activities related to the structures, systems and components under the jurisdiction of the Operations Quality Assurance Plan (OQAP).
- 2.2 Additional requirements specific to Dry Cask Storage System and Independent Spent Fuel Storage Installation activities are provided in Reference 4.7.

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## 3.0 DEFINITIONS

- 3.1 None

## 4.0 REFERENCES

- 4.1 OQAP Chapter 2.0, Table I
- 4.2 SNT-TC-1A, Recommended Practice for Nondestructive Personnel Qualification and Certification
- 4.3 10CFR55 Operator's Licenses
- 4.4 ASME Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components
- 4.5 OQAP Chapter 14.0, Records Control
- 4.6 INPO ACAD 92-004, Guidelines for the Conduct of Training and Qualification Activities

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>QUALIFICATION, TRAINING AND CERTIFICATION OF PERSONNEL</b>	<b>NUMBER</b> <b>Chapter</b> <b>4.0</b>	<b>REV.</b> <b>NO.</b> <b>6</b>
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4.7 OQAP Chapter 20.0, Dry Cask Storage System and Independent Spent Fuel Storage Installation

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## 5.0 REQUIREMENTS

### 5.1 General

5.1.1 Position qualification requirements shall be established for personnel in accordance with References 4.1, 4.2, 4.3, 4.4.

5.1.2 Programs shall be developed for the qualification, training, and certification of personnel. The programs shall provide for:

5.1.2.1 Establishing individual training files.

5.1.2.2 Documented certification, when required (e.g., NRC licensed personnel, NDE personnel).

5.1.2.3 Continuing training and retraining.

### 5.2 General Employee Training

5.2.1 A general employee training program shall be developed and administered to personnel requiring unescorted access within the protected and/or vital areas. This program shall address but not be limited to the following:

5.2.1.1 Job related procedures and instructions

5.2.1.2 Quality program indoctrination

5.2.1.3 Radiological health and safety

5.2.1.4 Industrial safety and fire protection

5.2.1.5 Emergency Plan

5.2.1.6 Security program

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>QUALIFICATION, TRAINING AND CERTIFICATION OF PERSONNEL</b>	<b>NUMBER</b> <b>Chapter</b> <b>4.0</b>	<b>REV.</b> <b>NO.</b> <b>6</b>
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5.2.2 Temporary personnel employed at the STP shall be trained in the above areas to the extent necessary to assure satisfactory performance of their duties.

### 5.3 Specialized Training Programs

5.3.1 NRC licensed operators shall be qualified, trained and certified in accordance with Reference 4.1 and 4.3.

5.3.2 Inspection, testing and examination personnel shall be qualified, trained, and certified in accordance with Reference 4.1.

5.3.3 Nondestructive examination personnel shall receive training, which meets the requirements of Reference 4.1, 4.2, 4.4, and 4.7.

5.3.4 Audit personnel shall be qualified, trained and certified to the requirements of Reference 4.1.

5.3.5 Other personnel shall be qualified, trained and certified commensurate with the functions they perform (e.g., welding, coating, chemical cleaning, maintenance, etc.).

5.4 Experienced personnel may be considered for exemption from prerequisite training. Training exemptions shall be controlled in accordance with approved station procedures.

5.5 Procedures shall provide for the evaluation of performance of employees to determine the capabilities of the individual to meet established qualification requirements.

5.6 Procedures shall provide for the recertification of appropriate personnel in accordance with applicable standards.

5.7 Training and certification of personnel, to the degree necessary for the activity, shall be completed prior to assignment of work on items or activities.

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>QUALIFICATION, TRAINING AND CERTIFICATION OF PERSONNEL</b>	<b>NUMBER</b> <b>Chapter</b> <b>4.0</b>	<b>REV.</b> <b>NO.</b> <b>6</b>
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## 6.0 DOCUMENTATION

- 6.1 Procedures, which are generated as required by this chapter, shall identify the records, which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.5.

## 7.0 ATTACHMENTS

- 7.1 None

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>Independent Technical Review</b>	<b>NUMBER</b> <b>Chapter</b> <b>16.0</b>	<b>REV.</b> <b>NO.</b> <b>12</b>
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## 1.0 PURPOSE

- 1.1 The purpose of this chapter is to describe the requirements and responsibilities for independent technical review for the South Texas Project (STP).

## 2.0 SCOPE

- 2.1 This chapter describes the independent technical review activities within the scope of the Operations Quality Assurance Plan (OQAP).

## 3.0 DEFINITIONS

- 3.1 None

## 4.0 REFERENCES

- 4.1 OQAP Chapter 1.0, Organization
- 4.2 OQAP Chapter 2.0, Program Description
- 4.3 OQAP Chapter 4.0, Qualification, Training, and Certification of Personnel
- 4.4 OQAP Chapter 13.0, Deficiency Control
- 4.5 OQAP Chapter 14.0, Records Control
- 4.6 OQAP Chapter 15.0, Quality Oversight Activities

## 5.0 RESPONSIBILITIES

- 5.1 The Chief Nuclear Officer is responsible for implementing quality program requirements including independent technical review.
- 5.2 The Manager, Quality is responsible for independent oversight activities performed to accomplish the independent technical reviews.

## 6.0 REQUIREMENTS

- 6.1 Independent oversight activities, as described in Reference 4.6, shall be performed in accordance with implementing procedures to ensure the completion of independent technical reviews.

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- 6.2 Independent technical reviews shall be used to observe and verify that activities are performed correctly and that human errors are reduced as much as practical.
- 6.3 Independent technical reviews shall include, but not be limited to, the following activities:
  - 6.3.1 Unit-operating characteristics
  - 6.3.2 Nuclear Regulatory Commission issuances
  - 6.3.3 Industry advisories
  - 6.3.4 Licensee Event Reports
  - 6.3.5 Other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety.
  - 6.3.6 Plant operations
  - 6.3.7 Maintenance activities
  - 6.3.8 Equipment modifications
  - 6.3.9 Independent Spent Fuel Storage Installation and Dry Cask Storage System
- 6.4 As determined by Quality management, several personnel performing independent technical reviews will be required to have a degree in engineering or related science and at least 3 years of professional level experience in the nuclear field.
- 6.5 Personnel performing independent technical reviews should be independent of performance function, signoff function, and the plant management chain while performing this oversight activity.
- 6.6 The results of independent technical reviews will be periodically transmitted to appropriate line and senior management, the Senior Management Team, the President and Chief Executive Officer, and Chief Nuclear Officer for review and/or action and advise management on the overall quality and safety of operations.
- 6.7 Conditions adverse to quality and recommendations identified during the performance of independent technical reviews shall meet the requirements of Reference 4.4

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7.0 DOCUMENTATION

- 7.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.5.

8.0 ATTACHMENTS

- 8.1 None

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>ADMINISTRATIVE CONTROLS</b>	<b>NUMBER</b> <b>Chapter</b> <b>19.0</b>	<b>REV.</b> <b>NO.</b> <b>5</b>
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## 1.0 PURPOSE

- 1.1 The purpose of this chapter is to describe the administrative controls (as previously documented in the Technical Specifications) as related to quality assurance for the South Texas Project (STP).

## 2.0 SCOPE

- 2.1 STP Nuclear Operating Company (STPNOC), as licensee, has the Quality responsibility for administrative controls of the STP.

## 3.0 DEFINITIONS

- 3.1 None

## 4.0 REFERENCES

- 4.1 OQAP Chapter 2.0, Table I
- 4.2 STP Technical Specifications
- 4.3 Updated Final Safety Analysis Report
- 4.4 OQAP Chapter 8, Control and Issuance of Documents
- 4.5 OQAP Chapter 14, Records Control
- 4.6 OQAP Chapter 15, Quality Oversight Activities
- 4.7 10CFR72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste

## 5.0 REQUIREMENTS

- 5.1 The Plant Operations Review Committee (PORC) shall function to advise the Plant General Manager on all matters related to nuclear safety.

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>ADMINISTRATIVE CONTROLS</b>	<b>NUMBER</b> <b>Chapter</b> <b>19.0</b>	<b>REV.</b> <b>NO.</b> <b>5</b>
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- 5.1.1 The PORC shall be composed of six members, who shall be appointed in writing by the Plant General Manager from senior experienced onsite individuals, at the manager level or equivalent, representing each of the following disciplines: engineering, operations, chemistry, health physics, quality assurance/quality control and maintenance. The quality assurance/quality control representatives shall not be appointed as PORC Chairman.
- 5.1.2 The PORC Chairman shall be appointed in writing from among those members by the Plant General Manager. One of the members shall meet the requirements of Regulatory Guide 1.8 (Personnel Selection and Training – Revision 1-R), Radiation Protection Manager.
- 5.1.3 All alternate members shall be appointed in writing by the Plant General Manager to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.
- 5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.
- 5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions shall consist of the Chairman or his designated alternate and three other members including alternates.
- 5.1.6 The PORC shall be responsible for:
- 5.1.6.1 Review of all safety-related station administrative procedures and changes thereto.
  - 5.1.6.2 Review of safety evaluations for (1) procedures, (2) changes to procedures, structures, components, or systems, and (3) tests or experiments completed under the provisions of 10CFR50.59 to verify that such actions did not require prior Nuclear Regulatory Commission (NRC) approval.
  - 5.1.6.3 Review of proposed (1) procedures, (2) changes to procedures, structures, components, or systems, and (3) tests or experiments completed under the provisions of 10CFR50.59 which may require prior NRC approval.

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- 5.1.6.4 Review of all required programs by Technical Specification 6.8 and the Technical Requirements Manual 6.8 and changes thereto.
- 5.1.6.5 Review of all proposed changes to the Technical Specifications or the Operating License.
- 5.1.6.6 Review of all REPORTABLE EVENTS.
- 5.1.6.7 Review of reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment or systems that affect nuclear safety.
- 5.1.6.8 Review of reports of unanticipated deficiencies in the design or operation of structures, systems, or components that affect nuclear safety.
- 5.1.6.9 Review of the Security Plan and implementing procedures and changes thereto.
- 5.1.6.10 Review of the Emergency Plan and implementing procedures and changes thereto.
- 5.1.6.11 Review of the PROCESS CONTROL PROGRAM and implementing procedures and changes thereto.
- 5.1.6.12 Review of the OFFSITE DOSE CALCULATION MANUAL and implementing procedures and changes thereto.
- 5.1.6.13 Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Senior Management Team (SMT).
- 5.1.6.14 Review of any accidental, unplanned, or uncontrolled release of liquid or gaseous radioactive effluents to the offsite environment and groundwater contamination events resulting in offsite notifications. The review shall include the preparation of reports covering evaluation, recommendations, and disposition of the corrective action(s) to prevent recurrence and the forwarding of these reports to the Plant General Manager and to the SMT.

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- 5.1.6.15 Reports of violations of codes, regulations, orders, Technical Specifications, or Operating License requirements having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.
- 5.1.6.16 Review of the Fire Protection Program, quality-related implementing procedures and changes thereto.
- 5.1.6.17 Review of activities related to the Independent Spent Fuel Storage Installation and the Dry Cask Storage System pursuant to the provisions of 10CFR72.
- 5.1.7 The PORC shall recommend in writing to the Plant General Manager approval or disapproval of items considered under section 5.1.6.1 through 5.1.6.5 prior to their implementation, and items considered under sections 5.1.6.9 through 5.1.6.12 and 5.1.6.17.
- 5.1.8 The PORC shall render determinations in writing with regard to whether or not each item considered under sections 5.1.6.1 through 5.1.6.5 and 5.1.6.15 may require prior NRC approval under the provisions of 10CFR50.59.
- 5.1.9 The PORC shall provide written notification within 24 hours to the President and Chief Executive Officer, the Chief Nuclear Officer, and the Senior Management Team of disagreement between the PORC and the Plant General Manager; however, the Plant General Manager shall have the responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.
- 5.1.10 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of this chapter. Copies shall be provided to the President and Chief Executive Officer, the Chief Nuclear Officer, and the appropriate organizational unit.
- 5.2 Appropriate organizational units shall function to provide independent review of designated activities as required by ANSI N18.7-1976/ANS-3.2, Sections 4.3, 4.3.1, 4.3.3, and 4.3.4.
- 5.2.1 Staff personnel required to perform these independent reviews shall collectively have the experience and competence to review operational activities in the following areas:

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- 5.2.1.1 Nuclear power plant operations;
- 5.2.1.2 Nuclear engineering;
- 5.2.1.3 Chemistry and radiochemistry;
- 5.2.1.4 Metallurgy;
- 5.2.1.5 Instrumentation and control;
- 5.2.1.6 Radiological safety;
- 5.2.1.7 Mechanical and electrical engineering;
- 5.2.1.8 Civil engineering;
- 5.2.1.9 Training;
- 5.2.1.10 Nuclear assurance;
- 5.2.1.11 Nuclear licensing;
- 5.2.1.12 Plant security, and;
- 5.2.1.13 Environmental impact

Note: If sufficient expertise is not available from within the STPNOC for the areas noted above, appropriate expertise shall be brought to bear in the independent reviews through the use of outside consultants.

- 5.2.2 The Senior Management Team shall functionally report to and advise the President and Chief Executive Officer and the Chief Nuclear Officer on those areas of responsibility specified in sections 5.2.3 and 5.2.4.
- 5.2.3 Appropriate organizational units shall be responsible for the review of:
  - 5.2.3.1 The safety evaluations for: (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10CFR50.59, to verify that such actions did not require prior NRC approval;
  - 5.2.3.2 Proposed changes to procedures, equipment, or systems which require prior NRC approval under the provisions of 10CFR50.59;

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- 5.2.3.3 Proposed tests or experiments which require prior NRC approval under the provisions of 10CFR50.59;
- 5.2.3.4 Proposed changes to Technical Specifications or the Operating License;
- 5.2.3.5 Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- 5.2.3.6 Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- 5.2.3.7 All REPORTABLE EVENTS;
- 5.2.3.8 All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- 5.2.3.9 Reports and meeting minutes of the PORC.
- 5.2.3.10 Review of activities related to the Independent Spent Fuel Storage Installation and the Dry Cask Storage System pursuant to the provisions of 10CFR72.

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- 5.2.4 Reports of audits of unit activities shall be reviewed by the Senior Management Team.
- 5.2.5 Records of organizational unit independent review activities shall be prepared, approved, and distributed as indicated below:

- 5.2.5.1 Reports of organizational unit independent reviews encompassed by sections 5.2.3 and 5.2.4 shall be prepared, approved, and forwarded to the President and Chief Executive Officer, the Chief Nuclear Officer, and the Senior Management Team.

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### 5.3 Technical Review and Control

- 5.3.1 Activities that affect nuclear safety shall be conducted as follows:

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- 5.3.1.1 Procedures required by Technical Specification 6.8 and Technical Requirements Manual 6.8, and other procedures that affect nuclear safety, and changes thereto, shall be prepared, reviewed, and approved. Each such procedure, or change thereto, shall be reviewed by an individual/group other than the individual/group who prepared the procedure, or change thereto, but who may be from the same organization as the individual/group who prepared the procedure, or change thereto. Procedures other than station administrative procedures shall be approved by the Plant General Manager or the head of the responsible department prior to implementation. The Plant General Manager shall approve station administrative procedures, security plan implementing procedures, and emergency plan implementing procedures. Temporary changes to procedures, which clearly do not change the intent of the approved procedures, shall be approved prior to implementation by two members of the plant staff, at least one of whom holds a Senior Reactor Operator's License. Changes to procedures that may involve a change to the intent of the original procedure shall be approved by the individual authorized to approve the procedure prior to implementation of the change.
- 5.3.1.2 Proposed changes or modifications to safety-related structures, systems, and components shall be reviewed as designated by the Plant General Manager. Each such modification shall be reviewed by an individual/group other than the individual/group who designed the modification, but who may be from the same organization as the individual/group who designed the modification. Proposed modifications to safety-related structures, systems, and components shall be approved by the Plant General Manager prior to implementation.
- 5.3.1.3 Proposed tests and experiments that affect nuclear safety and that are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved prior to implementation. Each such test or experiment shall be reviewed by an individual/group other than the individual/group who prepared the test or experiment but who may be from the same organization as the individual/group who prepared the test or experiment. Proposed tests and experiments shall be approved by the Plant General Manager.



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5.3.1.4 Individuals responsible for reviews performed in accordance with sections 5.3.1.1, 5.3.1.2, and 5.3.1.3 shall be members of the plant management staff previously designated by the Plant General Manager. Each review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.

5.3.1.5 Each review will include a determination of whether or not prior NRC approval is involved pursuant to 10CFR50.59. NRC approval of items will be obtained prior to Plant General Manager approval for implementation.

5.3.2 Records of the above activities shall be provided to the Plant General Manager, PORC, and/or the appropriate organizational unit as necessary for required reviews.

## 6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with the requirements of this chapter and Reference 4.4.

## 7.0 ATTACHMENTS

7.1 None

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## 1.0 PURPOSE

- 1.1 The purpose of this chapter is to supplement the basic policies established and documented as stated in the previously approved 10CFR50, Appendix B Operations Quality Assurance Plan (OQAP) to include specific requirements applicable to the design, construction, and operation of the Independent Spent Fuel Storage Installation (ISFSI) and Dry Cask Storage System (DCSS) at the South Texas Project (STP).
- 1.2 The objective of this chapter is to maintain administrative control over activities relative to the important to safety structures, systems, equipment, and components regulated by 10 CFR Part 72.

## 2.0 SCOPE

- 2.1 The policies and procedures identified within this chapter regarding the ISFSI will form the basis for plant-life operation of the STP ISFSI. The responsibility and authority for the establishment and execution of the ISFSI Quality Plan for the operation of the STP ISFSI will be retained by STP Nuclear Operating Company (STPNOC) and described in the OQAP.
- 2.2 This program is designed to meet the requirements of 10 CFR Part 20, Appendix G for a quality assurance program for the classification and characterization of radioactive waste under 10 CFR Parts 61.55 and 61.56.

## 3.0 DEFINITIONS

- 3.1 Important to Safety (ITS) Structures, Systems, and Components (SSCs) - those features of the ISFSI whose functions are:
  - 3.1.1 to maintain the conditions required to store spent fuel safely;
  - 3.1.2 to prevent damage to the spent fuel container during handling and storage; and

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3.1.3 to provide reasonable assurance that spent fuel can be received, handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.

3.2 Dry Cask Storage Quality Categories - Regulatory Guide 7.10 presents a method of classification of various components in transportation packaging (10CFR71) and dry cask storage systems (10CFR72). Each component is first identified as either Important to Safety (ITS) or Not Important to Safety" (NITS). Then, components that are considered ITS are further categorized into one of three classification categories (A, B, or C), depending on that component's importance to safety.

3.3 Category A, Category B, and Category C - as described below:

Classification Category	Importance to Safety	Description
A	Critical to Safe Operation	Category A items include structures, components, and systems whose failure could directly result in a condition adversely affecting public health and safety. The failure of a single item could cause loss of primary containment leading to release of radioactive material, loss of shielding, or unsafe geometry compromising criticality control.
B	Major Impact on Safety	Category B items include structures, components, and systems whose failure or malfunction could indirectly result in a condition adversely affecting public health and safety. The failure of a Category B item, in conjunction with the failure of an additional item, could result in an unsafe condition.
C	Minor Impact on Safety	Category C items include structures, components, and systems whose failure or malfunction would not significantly reduce the packaging effectiveness and would not be likely to create a situation adversely affecting public health and safety.

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3.4 Basic, or Fundamental, Safety Criteria - the following are considered to be the basic nuclear safety criteria for design of the ISFSI (NUREG-1567):

3.4.1 Maintain sub-criticality,

3.4.2 Prevent release of radioactive material above acceptable amounts,

3.4.3 Ensure radiation rates and doses do not exceed acceptable levels,

3.4.4 Maintain retrievability of the stored radioactive materials.

3.5 Certificate of Compliance (C of C) - the certificate issued by the Commission that approves the design of a spent fuel storage cask in accordance with the provisions of 10CFR72, Subpart L.

#### 4.0 REFERENCES

4.1 10CFR72, Licensing Requirements For The Independent Storage of Spent Nuclear Fuel And High-Level Radioactive Waste, and Reactor Related Greater Than Class C Waste - Subpart G, Quality Assurance.

4.2 ASME B&PV Code, Sections III, V, and IX (as required by DCSS Certificate of Compliance/FSAR)

4.3 Regulatory Guide 7.10, Establishing Quality Assurance Programs for Packaging used in Transport of Radioactive Material

4.4 10CFR50.55a, Codes and Standards

4.5 10 CFR Part 20, Appendix G.

4.6 10CFR 72.48, Changes, Tests and Experiments

4.7 SNT-TC-1A, American Society for Nondestructive Testing; Recommended Practice

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- 4.8 ANSI/ASNT CP-189, ANST Standard for Qualification and Certification of Nondestructive Testing Personnel
- 4.9 NUREG/CR-6407, Classification of Transportation Packaging and Dry Spent Fuel Storage System Components According to Importance to Safety
- 4.10 NOC-AE-12002873, Independent Spent Fuel Storage Installation (STI # 33563580)
- 4.11 NUREG 1567, Standard Review Plan for Spent Fuel Dry Storage Facilities

## 5.0 REQUIREMENTS

### 5.1 DCSS/ISFSI Organization

- 5.1.1 The responsibility for implementing quality program requirements for activities associated with the ISFSI and DCSS is described in the OQAP Chapter 1.0, Organization.

### 5.2 DCSS/ISFSI Quality Program

- 5.2.1 The requirements described in the OQAP Chapter 2.0, Program Description apply to all DCSS and ISFSI construction and operation activity and as specified below.
- 5.2.2 The determination of the ISFSI and dry storage and transport systems, structures, and components important to safety is in accordance with 10CFR71 Subpart H and 10CFR72 Subpart G, and includes those:
  - 5.2.2.1 Which comprise or are necessary to maintain the conditions required to store spent fuel or high-level radioactive waste safely,

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- 5.2.2.2 Which are necessary to prevent damage to the spent fuel or the high-level radioactive waste container during handling, storage, or transport, or
- 5.2.2.3 Which comprise or are necessary to provide reasonable assurance that spent fuel can be received, handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.
- 5.2.3 Quality assurance requirements apply to design, purchase, fabrication, handling, shipping, storing, cleaning, assembly, inspection, testing, operation, maintenance, repair, modification of structures, systems, and components, and decommissioning activities that are important to safety as defined by the DCSS Certificate of Compliance (C of C) and the DCSS Final Safety Analysis Report (FSAR).
- 5.2.4 The OQAP will provide the required control over activities affecting the quality of the identified structures, systems, and components to an extent commensurate with the importance to safety and, as necessary, to ensure conformance with the approved design of the ISFSI and DCSS.
- 5.2.5 STP will ensure that activities affecting quality are accomplished under suitably controlled conditions which include the use of appropriate equipment; suitable environmental conditions for accomplishing the activity, and assurance that pre-requisites for a given activity have been satisfied.
- 5.2.6 The need for special controls, processes, test equipment, tools and skills will be evaluated and resources will be provided to attain the required quality and the need for verification of quality by inspection and test.

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- 5.2.7 The degree of application of requirements and procedures will be based on the following considerations concerning the complexity and proposed use of the structures, systems, or components.
- 5.2.7.1 The impact of malfunction or failure of the item on safety;
  - 5.2.7.2 The design and fabrication complexity or uniqueness of the item;
  - 5.2.7.3 The need for special controls and surveillance over processes and equipment;
  - 5.2.7.4 The degree to which functional compliance can be demonstrated by inspection or test; and
  - 5.2.7.5 The quality history and degree of standardization of the item.
- 5.2.8 Category A items are those items that are critical to safe operation and include structures, components, and systems whose failure could directly result in a condition adversely affecting public health and safety. The failure of a single item could cause loss of primary containment leading to release of radioactive material, loss of shielding, or unsafe geometry compromising criticality control.
- 5.2.9 Category B items have a major impact on safety and include structures, components, and systems whose failure or malfunction could indirectly result in a condition adversely affecting public health and safety. The failure of a Category B item, in conjunction with the failure of an additional item, could result in an unsafe condition.

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5.2.10 Category C items have a minor impact on safety and include structures, components, and systems whose failure or malfunction would not significantly reduce the packaging effectiveness and would not be likely to create a situation adversely affecting public health and safety.

### 5.3 Design Control

5.3.1 Design Control activities are performed in accordance with OQAP Chapter 6.0, Design and Modification Control and as specified below.

5.3.2 STP will control DCSS and ISFSI design bases documents received from vendors and developed internally.

5.3.3 Design changes, tests and experiments must be reviewed pursuant to the requirements 10CFR72.48. The C of C holder may initiate 10CFR72.48 activities independent of station activities.

5.3.4 Design basis documents applicable to the ISFSI and DCSS will be included in the STP document control system, Master Equipment Database (MED), and Master Parts List (MPL) as applicable.

### 5.4 Procurement Document Control

5.4.1 Procurement Control activities are performed in accordance with OQAP Chapter 7.0, Procurement and as specified below.



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- 5.4.2 Procurement Document Control applies to documents employed to procure important to safety materials, parts, components, and services required to modify, maintain, repair, test, inspect, or operate as a result of, or in support of, the 10CFR72 licensed facilities at the STP relating to the ISFSI and DCSS. STPNOC controls procurement documents by written procedures that establish requirements and assign responsibility for measures to ensure that applicable regulatory requirements, design bases, and other requirements necessary to ensure quality are included in or invoked by reference in documents employed for the procurement of important to safety materials, parts, components, and services.
- 5.4.3 Procurement of SSCs applicable to the ISFSI and DCSS will meet requirements of 10CFR72 Subpart G. The graded approach to quality will be used in the quality classification of SSCs for use on the dry cask storage systems.
- 5.4.4 Originating and reviewing organizations shall require that the following be included or invoked by reference in procurement documents for important to safety items or services, as appropriate:
- 5.4.4.1 The supplier shall provide a description of a 10CFR72, Subpart G quality assurance program, or;
  - 5.4.4.2 A 10CFR50, Appendix B or a 10CFR71, Subpart H quality assurance program that meets 10CFR72, Subpart G requirements and the recordkeeping requirements of 10CFR72.174.
  - 5.4.4.3 10CFR21 is applicable to Categories A and B.

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5.4.5 Vendors supplying important to safety materials, parts, components, and services required to modify, maintain, repair, test, inspect, or operate as a result of, or in support of, the 10CFR72 licensed facilities at the STP will be evaluated for inclusion on the Approved Vendor List as required by OQAP Chapter 7.0, Procurement.

5.4.6 Vendors supplying important to safety materials, parts, components, and services required to modify, maintain, repair, test, inspect, or operate as a result of, or in support of, the 10CFR72 licensed facilities at the STP will be evaluated by Quality on an annual basis.

5.4.7 Vendors supplying important to safety materials, parts, components, and services required to modify, maintain, repair, test, inspect, or operate as a result of, or in support of, the 10CFR72 licensed facilities at the STP will be audited on a triennial basis.

## 5.5 Instructions, Procedures, and Drawings

5.5.1 Document control activities are performed in accordance with OQAP Chapter 8.0, Control and Issuance of Documents and as specified below.

5.5.2 Where the OQAP addresses control of Safety Related documents, Important to Safety Category A & B documents are to be included.

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5.5.3 These requirements are applicable to documents, which control activities Important to Safety for design, licensing, construction, operation, testing, maintenance, and modification of the ISFSI and DCSS. These documents include, but are not limited to, instructions, procedures, specifications, drawings, vendor manuals, status registers (such as drawing lists, equipment list), procurement documents, design documents, design change requests, as-built documents, non-conformance and deficiency reports, and Certificate Holder's Final Safety Analysis Report.

#### 5.6 Control of Purchased Materials, Equipment, and Services

5.6.1 Purchased Materials, Equipment and Service control activities are performed in accordance with OQAP Chapter 7.0, Procurement. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

#### 5.7 Identification and Control of Materials, Parts and Components

5.7.1 Material, Part and Component control activities are performed in accordance with OQAP Chapter 9.0, Control of Material. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

#### 5.8 Control of Special Processes

5.8.1 Special Processes are controlled in accordance with OQAP Chapter 5.0, Maintenance, Installation of Modifications, and Related Activities, Section 5.5. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.8.2 Nondestructive examinations associated with DCS activities will be evaluated by Engineering Department personnel independent of the activity. When ASME Section V is referenced personnel will be qualified in accordance with SNT-TC-1A and ANSI/ASNT CP-189.

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## 5.9 Inspection

- 5.9.1 Inspection is controlled in accordance with OQAP Chapter 10.0, Inspection. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.
- 5.9.2 Inspections related to DCSS/ISFSI activities shall be in accordance with the DCSS C of C and 10CFR72, Subpart G requirements.
- 5.9.3 NDE performed on DCSS shall be in compliance with referenced ASME Boiler & Pressure Vessel Code, Sections III and Section V, Articles 6, 9 and 10 or as specified in the applicable C of C and FSAR.

## 5.10 Inspection, Test and Operating Status

- 5.10.1 Inspection, Test and Operating Status is controlled in accordance with OQAP Chapters 3.0, Conduct of Operations, 5.0, Maintenance, Installation of Modifications, and Related Activities, 10.0, Inspection, and 11.0, Test Control. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.
- 5.10.2 Measures shall be established to ensure that necessary inspections of items meet the requirements and acceptance limits contained in the DCSS (C of C/FSAR) and have not been inadvertently bypassed or that SSC are not inadvertently operated outside of specified requirements.
- 5.10.3 Personnel performing examinations and tests shall be qualified as required by OQAP, Chapter 4.0 Qualification, Training and Certification of personnel.
- 5.10.4 The 10CFR72 C of C, for the storage systems in use at the STP ISFSI establishes technical specifications that ensure the systems are loaded, transferred, and maintained functional for safe storage.

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5.10.5 Sequence Change Control - Procedures will include the control of the sequence of required tests, inspections, and other operations when important to safety. To change these controls, the individual procedure must be changed, which requires the same review and approval cycle as that which authorized the original procedure.

#### 5.11 Test Control

5.11.1 Tests are controlled in accordance with OQAP Chapter 11.0, Test Control. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.11.2 Provisions will be established for the performance of DCS and ISFSI surveillance testing to ensure that the necessary quality of systems and components is maintained, that facility operations are within the safety limits, and that limiting conditions of operation can be met.

5.11.3 The testing frequency will be at least as frequent as prescribed in the Technical Specifications for the 10CFR72 C of C for DCSS used at the STPEGS.

#### 5.12 Control of Measuring and Test Equipment

5.12.1 M&TE is controlled in accordance with OQAP Chapter 12.0, Instrument and Calibration Control. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

#### 5.13 Handling, Storage, and Shipping

5.13.1 Handling, Storage, and Shipping is controlled in accordance with OQAP Chapter 9.0, Control of Material. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.13.2 Measures will be established to control the handling of licensed radioactive materials in accordance with 10CFR72.

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5.13.3 This program includes the storage of spent fuel, high level radioactive waste, and reactor-related Greater than Class C waste. When this material is stored in the facility licensed under 10CFR50, the OQAP applies. When this material is stored in the portion of the facility licensed under 10CFR72 (the ISFSI), 10CFR72, Subpart G quality assurance requirements apply.

#### 5.14 Records

5.14.1 Record control is in accordance with OQAP Chapter 14.0, Records Control. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.14.2 Records include, but are not limited to, those pertaining to the design, fabrication, erection, testing, maintenance, and use of structures, systems, and components important to safety and are required to be maintained by or under the control of the licensee or certificate holder until the NRC terminates the license or C of C as required by 10CFR72.174.

5.14.3 The term lifetime record is applicable to both the 10CFR50 and 10CFR72 licensed facilities at the STPEGS. In the case where lifetime records are applicable to both license types, the record will be maintained until the termination of the last license.

5.14.4 Records of the following activities performed in support of or as required for the ISFSI and/or DCSS shall be retained for the duration of the 10CFR72 licensed facility.

5.14.4.1 Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.

5.14.4.2 Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.

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- 5.14.4.3 Records of facility radiation and contamination surveys.
- 5.14.4.4 Records of radiation exposure for all individuals for whom monitoring was required.
- 5.14.4.5 Records of gaseous and liquid radioactive material released to the environment.
- 5.14.4.6 Records of training and qualification for members of the plant staff.
- 5.14.4.7 Records of in-service inspections performed pursuant to the Technical Specifications.
- 5.14.4.8 Records of Quality Assurance activities required by the OQAP.
- 5.14.4.9 Records of reviews performed for changes made to procedures or equipment or reviews for tests and experiments pursuant to 10CFR72.48.
- 5.14.4.10 Records of reviews performed pursuant to 10CFR72.212.
- 5.14.4.11 Records of meetings of the PORC.
- 5.14.4.12 Records of results of analyses required by the radiological environmental monitoring program.
- 5.14.4.13 Records of reviews performed for changes made to the Offsite Dose Assessment Manual and the Process Control Program.
- 5.14.4.14 Licensed radioactive waste disposal records.

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#### 5.15 Nonconforming Items

5.15.1 Control of conditions adverse to quality is covered in OQAP Chapter 13.0, Control of Conditions Adverse to Quality. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

5.15.2 The Certificate Holder shall address any fabrication nonconformances identified that require NRC approval.

#### 5.16 Corrective Action

5.16.1 Corrective Action is covered throughout the OQAP, in Chapter 13.0, Control of Conditions Adverse to Quality and others. Capability to comply with the requirements of 10CFR72, Subpart G will be maintained.

#### 5.17 Audits

5.17.1 Audits are covered in OQAP Chapter 15.0, Quality Oversight Activities and as specified below.

5.17.2 Audits of DCSS/ISFSI important to safety functions will be performed on a nominal biennial frequency to ensure the requirements of the 10CFR72 licensed ISFSI operation provisions contained within the DCSS Certificate of Compliance for the storage system(s) in use and applicable license conditions are maintained.



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6.0 DOCUMENTATION

- 6.1 Procedures which are generated as required by this procedure shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with this Chapter 20.0, Dry Cask Storage System and Independent Spent Fuel Storage Installation, Section 5.14 and Chapter 14.0, Records Control.

7.0 ATTACHMENTS

- 7.1 None