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 STARKEY, R.B. Carolina Power & Light Co.
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SUBJECT: Forwards change to QA Program & FSAR marked-up pages
 associated w/change. Proposed change reflects effort to place
 responsibility for quality at appropriate level in line
 organization & make improvements in assessment process.

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Carolina Power & Light Company

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10CFR50.54(a)(3)

R. B. STARKEY, JR.
Vice President
Nuclear Services Department

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
QUALITY ASSURANCE PROGRAM CHANGES

Gentlemen:

Carolina Power & Light Company (CP&L) hereby submits for approval a change to the Quality Assurance (QA) Program for the H. B. Robinson Steam Electric Plant, Unit No. 2 (HBR2). This request is submitted in accordance with 10CFR50.54(a)(3) and is detailed in Enclosure 1.

Enclosure 2 provides the FSAR marked-up pages associated with the QA Program change.

The proposed changes reflect CP&L's efforts to place the responsibility for quality at the appropriate level in the line organization and to make improvements in the assessment process. These improvements include enhancements to the corrective action program, emphasis on line organization self-assessment, and new direction for the independent assessment group. The new QA Program description is provided in Enclosure 3.

The revised program is expected to provide increased assurance that activities at CP&L's nuclear projects are accomplished in a safe and controlled manner by allowing more effective use of assessment resources. The HBR2 QA Program will continue to meet the applicable 10CFR50, Appendix B criteria.

These changes will be incorporated into the FSAR in accordance with the provisions of 10CFR50.71(e).

Should you have any questions regarding these changes, please contact Mr. D. C. McCarthy at (919) 546-6901.

Yours very truly,

R. B. Starkey, Jr.

DBB/jbw

Enclosures

cc: Mr. S. D. Ebnetter
Mr. L. W. Garner
Ms. B. L. Mozafari

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(1439RNP.GLU)

ENCLOSURE 1

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

QUALITY ASSURANCE PROGRAM CHANGE

QA PROGRAM CHANGE - FSAR, SECTION 1.8, REGULATORY GUIDE 1.33 PAGE 1.8.0-5

Proposed Change #1

The proposed change deletes the existing clarification "a" and replaces it with new clarifications "a & b" concerning CP&L's independent review and assessment programs. The new clarifications are provided to reference the plant Technical Specifications and Section 17.3 of the FSAR for details of these programs.

Reason for Changes

These new clarifications and references to the plant Technical Specifications and Section 17.3 of the FSAR eliminate duplication and potential misunderstandings.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

CP&L's NAD will implement Independent Assessments as described in Section 17.3. Results of Independent Assessments and reviews of those results by Senior Management will be in accordance with FSAR Section 17.3.

CP&L's Independent Review Program will be implemented in accordance with the plants Technical Specifications.

QA PROGRAM CHANGE - FSAR, SECTION 1.8, REGULATORY GUIDE 1.58 PAGE 1.8-10 & 11

Proposed Change #1A

The proposed change eliminates the commitment to the Regulatory Guide 1.58 listed on page 1.8.0-10 of the FSAR.

Reason for Change

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

The ANSI Standard (N45.2.6-1978) endorsed by this regulatory guide is remaining in effect, and CP&L will continue to comply with ANSI N45.2.6-1978.

Proposed Change #2

The proposed change deletes "Operating Plant QA" and Identifies that Quality Control (QC) personnel are qualified per this standard as stated in this position.

Reason for Change

Clarify organization description of personnel.

Basis for Concluding That the Revised program Incorporating the change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

Qualification of NAD personnel will be in accordance with FSAR Section 17.3.

Qualification of QC personnel will be in accordance with CP&L's commitment to Regulatory Guide 1.58 and Section 17.3.

QA PROGRAM CHANGE - FSAR, SECTION 1.8, REGULATORY GUIDE 1.88 PAGE 1.8-14

Proposed Change #2A

The proposed change eliminates the commitment to the Regulatory Guide 1.88 listed on page 1.8.0-14 of the FSAR.

Reason for Change

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

Basis for Concluding That the Revised program Incorporating the change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

The ANSI Standard (N45.2.9-1974) endorsed by this regulatory guide is remaining in effect, and CP&L will continue to comply with ANSI N45.2.9-1974.

Proposed Change #3

This proposed change adds a reference to FSAR Section 17.3 in the clarification section to ANSI N45.2.9 - 1974.

Reason for Change

Addition of this clarification does not change the manner in which business is conducted, but simply references where additional clarifications and controls on QA records are located in the FSAR. These controls/clarifications were previously included in FSAR Section 17.2 but were not referenced here. This provides a better description of where the controls for QA records are located in the program.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

Section 17.2 is being replaced in its entirety by Section 17.3, which describes the QA Program. Controls in 17.3 contain the elements previously contained in Section 17.2.

QA PROGRAM CHANGE - FSAR, SECTION 1.8, REGULATORY GUIDE 1.144 PAGE 1.8-20

Proposed Change #3A

The proposed change eliminates the commitment to the Regulatory Guide 1.144 listed on page 1.8.0-20 of the FSAR.

Reason for Change

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

The ANSI Standard (N45.2.12-1977) endorsed by this regulatory guide is remaining in effect. CP&L will continue to comply with ANSI N45.2.12-1977.

Proposed Change #4

The proposed change deletes the current clarifications relative to Regulatory Guide 1.144 and replaces them with two clarification statements to ANSI N45.2.12-1977.

Reason for Change

There is no change for external audits. The internal assessment process included in FSAR Section 17.3 better describes the methods to be accomplished than this Standard.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

Independent assessment of internal activities will be accomplished as outlined in Section 17.3.3.

QA PROGRAM CHANGE - FSAR, SECTION 1.8, REGULATORY GUIDE 1.146 PAGE 1.8-21

Proposed Change #4A

The proposed change eliminates the commitment to the Regulatory Guide 1.146 listed on page 1.8.0-21 of the FSAR.

Reason for Change

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

The ANSI Standard (N45.2.23-1978) endorsed by this Regulatory Guide is remaining in effect. CP&L will continue to comply with ANSI N45.2.23-1978.

Proposed Change #5

The proposed change replaces existing clarifications relative to audits and the lead auditor qualification. Qualification for External (vendor) auditors will continue to be accomplished in accordance with this standard. Qualification of internal independent assessment personnel will be accomplished in accordance with the requirements outlined in Section 17.3. A reference to Section 17.3 is being added to this page.

Reason for Change

The qualification for internal independent assessment personnel included in Section 17.3 better describes the methods to be accomplished than this Regulatory Guide or Standard.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

Qualification of internal assessment personnel shall be accomplished as outlined in Section 17.3 based on education and experience needed to evaluate the activity being assessed.

QA PROGRAM CHANGE - FSAR, SECTION 9.5, FIRE PROTECTION PAGES 2, 3, & 4

Proposed Change #6

The proposed change deletes the reference to the Corporate QA Manual.

Reason for Change

The deletion of these words does not affect the way that the QA Program will be implemented. They are being deleted to eliminate redundancy and possible conflicts.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

Section 17.2 is being replaced in its entirety by Section 17.3, which describes the proposed QA Program. Deletion of this reference will not affect the implementation of 17.3.

Proposed Change #7

The proposed change deletes the reference to QA personnel performing receipt inspection of FPQ items.

Reason for Change

This activity is performed by QC personnel in the Quality Verification Section.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

CP&L's reorganization of the Corporate Quality Assurance organization placed the responsibility of receipt inspection in the Quality Verification Section in the Nuclear Services Department. These functions have not changed as a result of this reorganization.

Proposed Change #8

The proposed change deletes references to audit requirements and responsibilities contained in this section.

Reason for Change

This change is being made to eliminate redundancy with the audit requirements of the Technical Specifications and the assessment function contained in Section 17.3.3.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

Section 17.3.3 describes the Independent Assessment process which replaces the audit responsibilities described here.

The NAD will implement the Independent Assessment Process. This process will ensure an effective means of reviewing and evaluating the CP&L QA Program.

Proposed Change #9

The proposed change deletes the reference to FSAR Section 17.2 for description of the QA Program controls applied to the Fire Protection Program.

Reason for Change

FSAR Section 17.2 is being replaced with FSAR Section 17.3. The references are being deleted to prevent possible conflicts in the references.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

FSAR Section 17.2 is being replaced in its entirety by FSAR Section 17.3, which describes the QA Program. Deletion of references to FSAR Section 17.2 will not affect the implementation of the QA Program.

QA PROGRAM CHANGE - FSAR SECTION 13.4, Page 13.4.0-1

Proposed Change #10

The proposed change deletes the specific details of the Audit Program and references FSAR Section 17.3 for this information

Reason for Change

Deletion of the specific details from this section eliminates duplication within the FSAR.

Basis for Concluding That the Revised Program Incorporating the Change Continues to Satisfy 10CFR50 Appendix B and the FSAR Quality Program

Section 17.3.3 describes the Independent Assessment process which replaces the Audit Program described here.

The Nuclear Assessment Department will implement the Independent Assessment Process. This process will ensure an effective means of reviewing and evaluating the CP&L QA Program.

QA PROGRAM CHANGE - FSAR SECTION 17.2, Pages 17.2.0 through 17.2.18-2

Proposed Change #11

The proposed change deletes FSAR Section 17.2 in its entirety and replaces it with Section 17.3, which describes the QA Program.

Reason for Change

The proposed FSAR Section 17.3 describes the use of performance-based assessment concepts which CP&L is using in the NAD and line organizations. The program content is the same as was in FSAR Section 17.2, except in the area of audit/assessment.

Basis for concluding that the revised program incorporating the change continues to satisfy 10CFR50 Appendix B and the FSAR Quality Program.

FSAR Section 17.3 replaces FSAR Section 17.2 in its entirety. The program content is the same as was in FSAR Section 17.2, except in the area of assessments. These controls will ensure an effective QA Program at CP&L.

ENCLOSURE 2

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

FSAR PAGE MARK-UPS

HBR 2
UPDATED FSAR

Regulatory Guide 1.33

QUALITY ASSURANCE PROGRAM
REQUIREMENTS (OPERATION) REVISION 2,
FEBRUARY 1978

ANSI Standard N18.7-1976

ADMINISTRATIVE CONTROLS AND QUALITY
ASSURANCE REQUIREMENTS FOR THE
OPERATIONAL PHASE OF NUCLEAR POWER
PLANTS

Comply with the provisions of Regulatory Guide 1.33, Rev. 2 February 1978, and the requirements and recommendations for administrative controls described in ANSI N18.7-1976, except as stated below:

Proposed Change #1
a) *(Insert New Paragraphs)* ~~Section 4.5 titled Audit Program: The next to last paragraph states, "Periodic review of the audit program shall be performed by the independent review body or by a management representative at least semiannually to assure that audits are being accomplished in accordance with requirements of Technical Specifications and of this Standard." CP&L's QA Auditing Unit is an independent section that monitors all other sections within our organization. Each audit report is reviewed by the Executive Vice President - Power Supply. CP&L feels that these management reviews stated satisfy the requirements of the above paragraph.~~

- c) ~~b)~~ Section 5.2.1.6 titled Measuring and Test Equipment: See FSAR Section 17.2.12 for clarification.
- d) ~~a)~~ The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978, shall be established, implemented, and maintained as specified in the HBR 2 Technical Specifications.
- e) ~~a)~~ Section 5.2.17 titled Inspections: The second to the last sentence in the last paragraph, "Deviations, their cause, and any. . .," to be consistent with Paragraph 5.2.11 and 10CFR50, Appendix B, the cause of the deviation will be determined for only significant conditions adverse to safety.
- f) ~~a)~~ Section 5.3.9.1 titled Emergency Procedure Format and Content: Emergency procedures shall be in the format as committed to in NUREG-0737, TMI Action Plan.
- g) ~~N)~~ Section 5.2.2 titled Procedure Adherence: Temporary changes to approved procedures shall be approved by persons specified in the HBR 2 Technical Specifications.

Insert for Reg. Guide 1.33

- a.) Section 4.3 titled Independent Review Program: CP&L will implement the independent review program outlined in the plant Technical Specifications. 6.5.2.
- b.) Section 4.5 titled Audit Program: CP&L will implement an assessment program outlined in Section 17.3.3 of the FSAR.

Regulatory Guide 1.58

QUALIFICATION OF NUCLEAR POWER PLANT
INSPECTION, EXAMINATION, AND TESTING
PERSONNEL (SEPTEMBER, 1980)

ANSI Standard N45.2.6-1978

QUALIFICATION OF INSPECTION,
EXAMINATION, AND TESTING PERSONNEL
FOR NUCLEAR POWER PLANTS

Proposed
change A
Insert Attachment

HBR 2 shall comply with ~~NRG Regulatory Guide 1.58, September 1980 which endorses~~ ANSI N45.2.6-1978, with the following exceptions:

a) Section 1.2 titled Applicability: CP&L elects not to apply the requirements of this guide to those personnel who are involved in the daily operations of surveillance, maintenance, and certain technical and support services whose qualifications are controlled by the Technical Specifications or are controlled by other QA Program commitment requirements. Only personnel in the following listed categories will be required to meet ANSI N45.2.6-1978 requirements:

- Proposed
change 2
- 1) Nondestructive examination (NDE) personnel,
 - 2) ~~Operating plant QA/QC inspection personnel.~~

b) The fourth paragraph of Section 1.2 requires that the Standard be imposed on personnel other than CP&L employees. The applicability of the Standard to suppliers and contractors will be documented and applied, as appropriate, in the procurement documents for such suppliers and contractors.

c) Section 1.4 titled Definitions: Definitions in this Standard which are not included in ANSI N45.2.10 will be used; definitions which are included in ANSI N45.2.10 will be used as clarified in CP&L commitment to Regulatory Guide 1.74.

d) Section 2.5 titled Physical: CP&L will implement the requirements of this Section with the stipulation that, where no special physical characteristics are required, none will be specified. The converse is also true: if no special physical requirements are stipulated by CP&L, none are considered necessary. CP&L employees receive an initial physical examination to assure satisfactory physical condition; however, only the following listed personnel will receive an annual (\pm 2 months) examination:

- Proposed
Change 2
- 1) NDE personnel,
 - 2) ~~Operating plant QA/QC inspection personnel.~~

This annual examination shall consist of the near visual acuity using the standard Jaeger's type chart or equivalent test.

Change 1A

Insert Attachment

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

- 3 | e) Section 3 titled Qualifications: Only personnel performing NDE (such as LP, MT, UT, & RT) will be grouped in levels of capability and certified as such. ~~QA/QC~~ inspection personnel will be certified for inspection, review and evaluation of inspection data, and reporting of inspection and test results.

Proposed Change # 2

- 3 | f) Section 3.5 titled Education & Experience Recommendations: CP&L will certify individual inspectors through training and experience to requirements appropriate to the specific assignment; however, except for NDE, personnel will not be classified by levels of capability. The training and experience requirements will be directed toward qualifying personnel for specific inspection and testing operations.

Regulatory Guide 1.88

COLLECTION, STORAGE AND MAINTENANCE
OF NUCLEAR POWER PLANT QA RECORDS
(AUGUST, 1974)

Proposed
Change 2A

ANSI Standard N45.2.9-1974

COLLECTION, STORAGE, AND MAINTENANCE
OF QA RECORDS

Insert Attachment

Proposed Change 3

The requirements for collection, storage, and maintenance of QA records at HBR Unit 2 will be in accordance with ANSI N45.2.9-1974, subject to the following: and FSAR SECTION 17.3

- a) Section 5.4, Item 2 Loose Records: HBR complies with this requirement except for short periods of time during the microfilming process.
 - b) Section 5.6 states: "Permanent and temporary records storage facilities shall be so constructed or located as to protect contents from possible destruction by causes such as fire, flooding, tornadoes, insects, rodents, and from possible deterioration by a combination of extreme variations in temperature and humidity conditions."
- QA records are stored in permanent and temporary facilities as follows:
- 1) One hour UL-rated fireproof file cabinets are utilized for temporary storage of records. These file cabinets are located at work stations throughout the plant and will contain the records until transmitted to the vault.
 - 2) Permanent storage of QA records will be in the plant vault constructed to meet the requirements of this ANSI Standard.
 - 3) Selected records may be stored off site by a QA Records Storage supplier, provided that supplier meets the applicable sections of this ANSI Standard.
- c) ANSI N45.2.9, Section 5.6 states: "Structure, doors, frames, and hardware should be Class A fire-rated with a recommended four-hour minimum rating." The reinforced concrete vault structure has 18" thick walls and a 15" thick roof which encompasses the minimum thickness requirements of 8" for reinforced concrete as required by NFPA 232-1980. However, seals for penetrations through walls designed to provide fire protection in excess of three hours are not available. Doors and hardware are also not available having a four-hour rating and meeting the pressure differential from a Region I design basis tornado. Doors for the vault are designed and constructed to withstand the pressure differential of a Region I tornado and meet the requirements for a three-hour fire.

Change 2A

Insert Attachment

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

Regulatory Guide 1.144

AUDITING OF QUALITY ASSURANCE
PROGRAMS FOR NUCLEAR POWER PLANTS
(JANUARY 1979)

Proposed Change 3A

ANSI Standard N45.2.12-1977

REQUIREMENTS FOR AUDITING OF QUALITY
ASSURANCE PROGRAMS FOR NUCLEAR POWER
PLANTS

INSERT ATTACHMENT

~~GP&L will follow the requirements and recommendations of paragraphs C.1, C.2, C.3.a.2, C.3.b, and C.4. Our position on paragraph C.3.a.1 is as follows:~~

~~Audits of operational phase activities, as outlined in Section 6, H. B. Robinson Technical Specifications, shall be performed at the frequencies specified in the Technical Specifications.~~

INSERT New Paragraph

Proposed Change 4

Change 3A

Insert Attachment

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

Change 4

Insert for Reg. Guide 1.44

CP&L shall comply with the requirements of ANSI
N45.2.12(1977) for external (vendor and supplier) audits.

Assessments of internal activities shall be accomplished as
outlined in Section 17.3.3.

Regulatory Guide 1.146

Proposed Change 4a

ANSI Standard N45.2.23-1978

Insert Attachment

QUALIFICATION OF QA PROGRAM AUDIT
PERSONNEL FOR NUCLEAR POWER PLANTS
(REVISION 0) (AUGUST, 1980)

QUALIFICATION OF QUALITY ASSURANCE
PROGRAM AUDIT PERSONNEL FOR NUCLEAR
POWER PLANTS

HBR 2 shall comply with ~~NRC Regulatory Guide 1.146, Revision 0, which endorses~~
~~ANSI N45.2.23-1978,~~ with the following exceptions:

for external (vendor and supplier) audits

a) ~~Section 1.4 titled Definitions: Definitions in this Standard which are~~
~~not included in ANSI N45.2.10 will be used; "AUDIT" which is included in ANSI~~
~~N45.2.10 will be used as clarified in CP&L commitment to Regulatory~~
~~Guide 1.74.~~

b) ~~Section 2.2 titled Qualification of Auditors: Subsection 2.2.1~~
~~references an ANSI B45.2 which will be assumed to be N45.2. CP&L will comply~~
~~with an alternate subsection 2.2.1 which reads:~~

~~Orientation to provide a working knowledge and understanding of the CP&L QA~~
~~Program, including the Regulatory Guides and ANSI standards included in the~~
~~Program, and CP&L procedures for performing audits and reporting results.~~

c) ~~Section 3.2 titled Maintenance of Proficiency: CP&L will comply with~~
~~the requirements of this Section by defining "annual assessment" as one which~~
~~takes place every 12 months, plus or minus three months, and which will use~~
~~the initial date of certification for determining when annual assessment is~~
~~due.~~

d) ~~Section 4.1 titled Organizational Responsibility: CP&L will comply~~
~~with this Section with the substitution of the following sentence in place of~~
~~the last sentence in the Section.~~

~~The Manager of QA Services, Principal QA Specialist - Performance Evaluation,~~
~~or Lead Auditor shall, prior to commencing the audit, assign personnel who~~
~~collectively have experience or training commensurate with the scope,~~
~~complexity, or special nature of the activities to be audited.~~

Q 4) Section 5.3 titled Updating of Lead Auditors' Records: CP&L will
substitute the following sentence for this Section:

Records for each Lead Auditor shall be maintained and updated during the
annual management assessment as defined in Section 3.2 (as clarified).

b 5) Section 5.4 titled Record Retention: CP&L will substitute the
following sentence for this Section.

Qualification records shall be retained as required by the CP&L QA Program.

Insert New Paragraph

Change 4A

Insert Attachment

The NRC provided notification for withdrawal of this Regulatory Guide (see 56 Federal Register at 36175) because it has become obsolete.

Change 5

Insert for Reg. Guide 1.146

- c.) Qualification of internal assessment personnel shall be accomplished as outlined in Section 17.3.3 based on education and experience needed to evaluate the activity being assessed.

9.5.1.3 Fire Prevention Program

9.5.1.3.1 General

The fire protection program at HBR2 consists of design features, equipment, personnel, and procedures which combine to provide for a multitiered safeguard against a fire which could impact the health and safety of the public.

9.5.1.3.2 Program Control

The effective implementation of the HBR2 fire protection program depends to a large degree on the stipulation that activities which significantly impact fire safety will be performed in accordance with established procedural controls. These controls consist of two types--those which control specific work activities (e.g., surveillance test of a diesel fire pump) and those which are administrative or programmatic in nature (e.g., a welding permit system). A discussion of the controls follows:

4 a) Housekeeping - Proper housekeeping is considered essential to the operation of the Robinson plant since it can directly affect the safety and health of all personnel. From a fire protection standpoint, good housekeeping helps to limit the quantity of combustible material that could be ignited and the consequences of fires that may occur.

b) Combustible Hazards and Ignition Sources - The probability of the occurrence of fires at Robinson is minimized through the control of combustible materials and sources of ignition. The plant Operating Manual contains written instructions regarding the storage and use of combustible materials; the use of welding, burning, and other open flame operations; and routine fire inspections of plant areas.

Welding, flame cutting, grinding, and other operations which constitute a source of ignition are controlled by a permit system. This permit system is in accordance with the general guidelines specified in NFPA 51B, Cutting and Welding Processes. A multilevel structure of responsibility ensures that carelessness or omission of any step in the system does not compromise fire safety.

Control of combustible material is achieved by providing guidelines regarding the storage and use of flammable and combustible liquids, gases, and solids. Specific guidelines for the control of flammable and combustible liquids generally follow the recommendations of NFPA 30, Flammable and Combustible Liquids Code. Similarly, guidelines for the control of flammable gases generally meet the intent of NFPA recommendations.

Periodic inspections of plant areas are performed and documented by the fire protection group in accordance with established procedures.

c) ~~Control of Maintenance and In-Plant Work Activities - In accordance with the Corporate Quality Assurance Manual,~~ A program of preventive maintenance has been established for appropriate fire protection items. These preventive maintenance requirements are met by either the preventive maintenance program or by the periodic testing activities. The plant Operating Manual contains procedures which describe the Maintenance Subunit

Proposed Change #6

preventive maintenance program. Surveillance activities performed on fire protection items by Operations is done in accordance with procedures in the plant Operating Manual.

Corrective maintenance is controlled by procedures which specify the reviews needed to evaluate Fire Protection's involvement. Maintenance work forms involving fire protection items are coordinated with the fire protection group.

d) Plant Modification and Design Change Review - Plant modifications and design changes are controlled in order to ensure that plant structures, systems, and components continue to meet their performance/functional objectives. The plant Operating Manual includes written instructions that describe the modification process and the means for documenting the required changes and activities. As a part of this process, each engineer responsible for the plant modification is required to consider the effects of the modification on the fire protection program. In addition, the modification package receives an independent fire protection review by the Fire Protection Senior Specialist or his designee.

Specifically, the fire protection review considers the type and quantity of combustibles introduced (both permanent and temporary) and any degradation of any fire protection features to determine if (1) additional fire suppression capability is required, (2) if a limiting conditions of operation is involved, and/or (3) if special administrative controls are necessary.

e) Fire Protection List - Fire Protection List components are those which must perform their intended function when required or the loss of safety-related and safe shutdown equipment may result during a postulated fire. The Fire Protection List components usually demand special ordering, material handling, installation, and/or testing requirements.

The Fire Protection List outlines boundaries to fire protection systems within which all Fire Protection List components are contained and is maintained as part of the plant Operating Manual.

f) Procurement Activities - The plant Operating Manual contains written instructions concerning the procurement and storage requirements for safety- and nonsafety-related items. These instructions provide for differing levels of quality control depending on the quality classification of the item. For fire protection items, this classification includes Fire Protection List components.

Upon receipt of fire protection items at the warehouse, a receipt inspection is performed in accordance with the instructions provided in the purchase requisition. In general, fire protection items are visually receipt inspected to ensure that the material being delivered is the type and quantity ordered, that no shipping damage has occurred, that protective coverings and coatings are in place, and that any required documentation is received. The Fire Protection List items require inspection by Quality Assurance personnel.

~~g) Audits - The plant General Manager is responsible for ensuring the following audits are accomplished:~~

Proposed Change #8

Proposed Change #7

Proposed Change #8

~~1) An annual independent audit by qualified offsite personnel or an outside firm in accordance with the Technical Specifications, and~~

~~2) A triennial audit by an outside fire consultant in accordance with the Technical Specifications.~~

~~The above audits are coordinated and conducted by Corporate Quality Assurance. They establish the framework and content of the audits.~~

9.5.1.3.3 Quality Assurance

Insert new paragraph

~~The Corporate Quality Assurance Program is described in Section 17.2. This quality assurance program is applied to the fire protection program at Robinson as outlined in Section 18 of the Corporate Quality Assurance Manual.~~

9.5.1.3.4 Fire Protection Training

Proposed Change #9

Training is an essential ingredient in developing and maintaining an effective fire protection program. The plant General Manager has the overall responsibility for the fire protection training program. The fire protection training program is designed to provide training to plant personnel commensurate with their respective responsibilities. Depending on job responsibilities, the intensity of training may range from a short introduction to fire safety to weeks of extensive training.

9.5.1.3.5 Hartsville Fire Department Support

The Hartsville Fire Department is a supplement to the plant's fire fighting capability. To effectively utilize this support, indoctrination training and fire fighting coordination is conducted for this group.

9.5.1.4 Systems Description

9.5.1.4.1 General

The fire protection system at Robinson integrates several design features to establish a multitiered defense against fire damage.

Suppression systems comprise the primary tier and are used to extinguish fires. Fire detection systems alert operators to fires and also actuate automatic fixed suppression systems. Fire barriers limit fire spread and protect vital equipment. Emergency lighting enables more efficient response by trained operators and fire brigade members.

9.5.1.4.2 Fire Suppression Systems

9.5.1.4.2.1 Systems Function

The fire suppression systems deliver extinguishing agents through both manually and automatically actuated devices. System design is based on the degree of hazard present in an area when balanced with other concerns. Such concerns include plant area, ease of manual fire fighting, protection of safety-related equipment, and personnel safety.

Change 9

Insert new paragraph 9.5.1.3.3

The Quality Assurance program requirements applied to the fire protection program are outlined in Section 17.3.

13.4 REVIEW AND AUDIT

FSAR SECTION 17.3.3

The description of plans for conducting ^{assessments} ~~reviews and audits~~ of operating phase activities that are important to safety is contained in ~~Section 6.5, "Review and Audit"~~ of Plant Technical Specifications issued by the Nuclear Regulatory Commission as Appendix A to the Facility Operating License (Reference ~~13.1.2-1~~).

Proposed Change 10

Proposed Change 11

Section 17.2 is being replaced in its entirety. It is replaced with the attached Section 17.3.

ENCLOSURE 3

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2

QUALITY ASSURANCE PROGRAM DESCRIPTION

17.3.1 MANAGEMENT

17.3.1.1 Methodology

It is the policy of Carolina Power & Light Company (CP&L) to operate and maintain nuclear power plants without jeopardy to its employees or to the public health and safety.

This Quality Assurance (QA) Program and revisions are approved by the Executive Vice President - Power Supply.

The QA Program and procedures apply to activities affecting quality. (e.g., operation, maintenance, modification, and refueling.) This program applies to individuals and organizations responsible for operating and supporting the nuclear plants. The program and procedures define responsibilities and authorities, prescribe measures for the control and accomplishment of activities for the operation of safety related, fire protection and radwaste structures, systems, and components and requires appropriate verification of conformance to established requirements. A list or system identifying items and activities to which this program applies is maintained at each nuclear plant or work location. Controls and responsibilities for maintaining this list or system are prescribed in procedures.

This QA Program and implementing procedures shall be used and updated as necessary to assure that the Company's nuclear generating units are managed such that they will be operated and maintained in a safe manner.

Deviations from this program shall be permitted only upon written authority from the Executive Vice President - Power Supply.

The QA Program is founded on the principle that the line organization is responsible for quality and safety. Self-assessment practices are used to ensure the desired levels of quality and safety are achieved and maintained. There are three levels of assessment in CP&L. The first level is the line organization and consists of each individual being involved with plant performance to ensure the plant is operated in a safe, reliable, and efficient manner. The second level consists of the Nuclear Services Department, along with the functional area line organization, monitoring the plant operation and processes to ensure that performance goals are set and achieved for the three nuclear projects. The third level consists of the Nuclear Assessment Department (NAD) independently evaluating the performance and effectiveness of plant programs, processes, personnel, and the line organization's self-assessment. These activities are to detect deficiencies in the desired levels of performance and quality, reporting these conditions to Senior Management, and ensuring adequate action is taken to correct and eliminate these conditions.

17.3.1.2 Organization

The CP&L organization responsible for the safe plant operation is described in Section 13.1 of the FSAR and in implementing procedures. The term "line organization" used in this program refers to the production organization reporting to the Senior Vice President - Nuclear Generation Group.

Procurement documents require suppliers to operate in accordance with QA programs which are compatible with the applicable requirements of the CP&L's QA Program and procedures where their services are utilized in support of plant activities.

17.3.1.3 Responsibility

The primary responsibility for quality performance, including the identification and effective correction of problems potentially affecting the safe and reliable operation of the Company's nuclear facilities, resides with the line organization.

The managers of functions involving nuclear fuel, engineering, and operations shall assure that their personnel are adequately trained for their jobs and they have the experience and education required to carry out their assigned responsibilities. These managers shall ensure that adequate resources and procedures are available for correctly implementing the work activities to support this program.

Independent inspections are conducted to verify specific critical quality attributes. Individuals performing these inspections have access to necessary information to ensure that activities and equipment meet established acceptance criteria.

The NAD shall independently monitor and assess the Company's nuclear programs on a continuing basis. The NAD performs assessments which incorporate the previous "QA audits". These evaluations are performance based with emphasis on quality of the end product.

The Manager - NAD shall review with the senior operating officer in the Company on a regular periodic basis the overall effectiveness of the Company's QA Program. He shall have access to the corporate management up to and including the President/Chief Executive Officer to resolve any quality or nuclear safety related concerns if the concerns cannot be resolved satisfactorily at a lower management level.

The results and effectiveness of the assessment organization and processes in accomplishing its assigned objectives will be evaluated annually.

17.3.1.4 Authority

The program and procedures require that the authority and duties of persons and organizations performing activities affecting quality functions be clearly established and delineated in writing and that these individuals and organizations have sufficient authority and organizational freedom to:

- a) Identify quality, nuclear safety, and performance problems.
- b) Order unsatisfactory work to be stopped and control further processing, delivery, or installation of nonconforming material.
- c) Initiate, recommend, or provide solutions for conditions adverse to quality.
- d) Verify implementation of solutions.

17.3.1.5 Personnel Training and Qualification

Both on-site and off-site personnel within the CP&L organization and contract personnel, who perform activities affecting quality (implement elements of the QA Program) shall be indoctrinated and trained such that they are knowledgeable and capable of performing their assigned tasks.

Training programs and reviews ensure that proficiency of personnel performing activities affecting quality is achieved and maintained by training (formal & OJT), examining, and/or certifying, as appropriate.

Personnel training and qualification records are to be maintained by responsible management to ensure qualified individuals are assigned to activities affecting quality.

Personnel within the Operating organization performing duties of a licensed operator are indoctrinated, trained, and qualified as required by 10CFR55.

17.3.1.6 Corrective Action

The primary goal of the CP&L corrective action program is to improve overall plant operations and performance by identifying and correcting root causes of equipment and human performance problems. Part of this effort is directed toward encouraging individuals to voluntarily report events, near misses, and potential problems. It is the policy of CP&L to seek improvement in each nuclear plant's performance as well as in the performance of supporting departments.

Management will emphasize to all levels in the organization the importance of identifying and effectively correcting situations that can adversely affect human and equipment performance. An important aspect of this program is the assignment of qualified personnel to accurately evaluate equipment/human performance problems, implement appropriate corrective actions, and verify corrective action adequacy.

Management is responsible for fostering a positive environment that encourages the self-identification of adverse conditions and trends.

The program requires that an evaluation of adverse conditions such as conditions adverse to quality, nonconformances, failures, malfunctions, deficiencies, deviations, and defective material and equipment is conducted to determine need for corrective action.

Conditions adverse to quality are identified through inspections, assessments, tests, checks, and review of documents.

The program requires corrective action to be initiated to preclude recurrence of significant conditions adverse to quality.

Procedures require follow-up reviews, verifications, inspections, etc., to be conducted to verify proper implementation of corrective action and to close out the corrective action documentation.

The program outlines the methodology for resolution of disputes involving quality and nuclear safety issues arising from a difference of opinion between identifying personnel and other groups.

Significant conditions adverse to quality are reported to appropriate management for review and evaluation.

Periodic review and evaluation of adverse trends are performed by management.

17.3.1.7 Regulatory Commitments

The operation of nuclear plants shall be accomplished in accordance with the U.S. Nuclear Regulatory Commission (NRC) Regulations specified in Title 10 of the U.S. Code of Federal Regulations.

The operation of the Company's nuclear power plants shall be in accordance with the terms and conditions of the facility operating license issued by the NRC.

The program and procedures are designed to ensure compliance with the NRC Regulatory Guides and ANSI Standards applicable to the operations phase, and to which RNP is committed. The commitment to comply or alternatives for CP&L to follow are presented in Section 1.8 in this FSAR. Where ever the requirements of this section conflict with the commitments to regulatory guides and codes and standards, the requirements of this section shall govern.

The Nuclear Regulatory Commission shall be notified of changes to the QA Program description in accordance with 10CFR50.54(a)(3).

17.3.2 PERFORMANCE/VERIFICATION

17.3.2.1 Methodology

Personnel performing work activities are responsible for achieving the acceptable level of quality.

Personnel performing verification activities are responsible for verifying the achievement of acceptable quality.

Work is accomplished and verified using instructions, procedures, or appropriate means that are of a detail commensurate with the activity's complexity and importance to safety.

Criteria that define acceptable quality are specified in procedures and/or other documents, and verification, when required is performed against these criteria.

17.3.2.2 Design Control

Procedures define requirements for the control of design activities associated with modifications of items that are safety-related.

Design changes are subject to appropriate controls which were applicable to the original design. CP&L may designate an organization to make design changes other than the organization which prepared the original design. In any case, CP&L will assure that the organization has access to pertinent background information, including an adequate understanding of the requirements and intent of the original design, and that the organization has demonstrated competence in applicable design areas.

Care shall be taken to assure that the design selected to accomplish a necessary or desirable change does not create "new" problems in off-normal modes of operation or in adjacent inter-tied systems.

Design changes made to the plant are accomplished in a planned and controlled manner in accordance with written, approved procedures. These procedures include provisions, as necessary, to ensure that:

- a) Design documents (such as specifications, drawings, procedures and instructions) reflect applicable regulatory, performance, quality, and quality verification requirements and design bases. These documents are checked for accuracy and completeness by qualified individuals and reviewed to assure that documents are prepared in accordance with procedures.
- b) There is adequate review of the suitability of materials, parts, equipment, and processes which are essential to the safety-related functions of structures, systems, and components.
- c) Materials, parts, and equipment which are commercial grade items or which have been previously approved for a different application are evaluated for suitability prior to selection.

- d) Design documents and procedures are controlled to reflect design modifications and "as-built" conditions.
- e) Internal and external design interfaces between organizations participating in modification activities are adequately defined and controlled, including the review, approval, release, and distribution of design documents and revisions.

The above controls are applied as necessary to such aspects of design as reactor physics; seismic, stress, thermal, hydraulic, radiation, and accident analyses; compatibility of materials; and accessibility for inservice inspection, maintenance, and repair.

Any errors or deficiencies found in the design process or the design itself are documented and corrected, as outlined in the applicable department's corrective action program procedures.

Following completion of the design change/modification, controlled design change information is made available to affected personnel.

Training, on design changes/modifications that affect the operation of the plant, is provided to affected plant operating personnel.

17.3.2.3 Design Verification

Procedures require that the adequacy of design changes be verified by the performance of design reviews, alternate calculations, or qualification testing. The control measures specified in the plan for control of design verification activities are as follows:

- a) Personnel responsible for design verification do not include the original designer or the designer's immediate supervisor unless the immediate supervisor is the only one capable of verifying the design.
- b) Procedures identify the positions or organizations responsible for design verification and define their authority and responsibility. Procedures also provide guidelines as to the method of design verification to be used. Unless otherwise specified, design verification is performed by the method of independent design reviews and includes verification that SAR commitments have been addressed.
- c) Qualification tests, or analyses when appropriate, shall assure that all modes of operation are not adversely affected by the design change.
- d) Design changes are reviewed to assure that design parameters are defined and that inspection and test criteria are identified.
- e) Design verification is completed prior to relying upon the component, system or structure to perform its function.

17.3.2.4 Procurement Control

Procedures define requirements for the control of procurement documents and ensure that purchased material and services are of acceptable quality.

Potential contractors and suppliers are evaluated by Vendor and Equipment Quality Unit personnel prior to award of a procurement document when needed to assure the contractor's or supplier's capability to comply with applicable technical and quality requirements.

Carolina Power & Light Company maintains a program for supplier evaluation, results of supplier evaluation, surveillance of suppliers, supplier furnished records, certificates of conformance, effectiveness of supplier quality control, and the purchase of spare or replacement parts.

Procurement documents, such as purchase specifications, contain or reference the following:

- a) Technical, administrative, regulatory, and reporting requirements, including material and component identification requirements, drawings, specifications, codes and industrial standards, test and inspection requirements, and special process instructions.
- b) Identification of the documentation to be prepared, maintained, or submitted (as applicable) to CP&L for review and approval. These documents may include, as necessary, inspection and test records, qualification records, or code required documentation.
- c) Identification of those records to be retained, controlled, and maintained by the supplier, and those delivered to the purchaser prior to use or installation of the hardware.

Receipt inspections are performed by qualified inspectors in accordance with procedures to assure that:

- a) Materials, equipment, or components are properly identified and correspond with associated documentation.
- b) Inspection records or certificates of conformance attesting to the acceptance of materials, equipment, and components are completed and are available prior to installation or use.
- c) Materials, equipment, and components are inspected and judged acceptable in accordance with predetermined inspection instructions prior to installation or use.
- d) Items not meeting applicable requirements are clearly identified and controlled until proper disposition is made.

Appropriate controls and provisions have been included in procurement procedures for selection, determination of suitability for the intended use, evaluation, receipt, and quality evaluation of commercial grade items to ensure that these items will perform satisfactorily in service.

17.3.2.5 Procurement Verification

Carolina Power & Light Company procurement documents are prepared, reviewed, approved, and controlled in accordance with procedures to assure that requirements are correctly stated, inspectable, verifiable, and controllable, and there are adequate acceptance/rejection criteria. Procurement documents are reviewed by personnel knowledgeable in applicable technical and quality requirements, and documentary evidence of that review and approval is retained and available for verification.

17.3.2.6 Identification and Control of Items

Procedures require spare or replacement parts to be subject to QA program controls, codes and standards, and technical requirements which ensure they are suitable for their intended service.

Items accepted or released are identified as to their inspection status prior to forwarding them to a controlled storage area or releasing them for installation or further work. (Bulk items will not require individual accept tags; however, status of unacceptable bulk items will be so indicated).

Procedures require that materials, parts, and components be identified and controlled to prevent the use of incorrect or defective items. These procedures also require that identification of items be maintained either on the item in a manner that does not affect the function or quality of the item, or on records traceable to the item.

Procedures implementing these requirements provide for the following:

- a) Verification that items received at the plant are properly identified and can be traced to the appropriate documentation, such as drawings, specifications, purchase orders, manufacturing and inspection documents, nonconformance reports, or material test reports.
- b) Verification of item identification consistent with the CP&L inventory control system and traceable to documentation which identifies the proper uses or applications of the item.

Consumables utilized in safety-related structures, systems and components are subject to appropriate controls as described in procedures.

17.3.2.7 Handling, Storage, and Shipping

Procedures define requirements for the control of the handling, storage, and shipping of safety-related items. These procedures require measures to be taken to ensure special handling, storage, cleaning, packaging, shipping, and preservation requirements are established to control these activities in accordance with design and specification requirements to preclude damage, loss or deterioration by environmental conditions such as temperature or humidity.

Provisions are established to control the shelf life and storage of chemicals, reagents, lubricants, and other consumable materials.

17.3.2.8 Test Control

Procedures define requirements for test programs when required and require that items be tested to demonstrate that they will perform satisfactorily in service.

Modifications, repairs, and replacements are accomplished in accordance with the original design and testing requirements or acceptable alternatives.

Test procedures incorporate or reference the following, as required:

- a) Instructions and prerequisites for performing the test,
- b) Use of proper test equipment,
- c) Mandatory inspection hold points,
- d) Acceptance criteria

Test results are documented, evaluated, and their acceptability determined by a qualified, responsible individual or group.

When the acceptance criteria is not met, affected areas are to be retested or evaluated, as appropriate.

17.3.2.9 Measuring and Test Equipment Control

Procedures define requirements for the control of measuring and test equipment used. These procedures include requirements to establish procedures for the calibration technique and frequency, maintenance, and control of measuring and test equipment.

Inspections and test devices are selected to assure accurate measurement (i.e. to overcome inherent inaccuracies associated with environment, human error, equipment, etc.).

Measuring and test equipment (M&TE) is identified and traceable to the calibration test data.

Measuring and test instruments are calibrated at specified intervals (or immediately before and after use) based upon one or more of the following:

- a) Technical Specifications.
- b) Required accuracy.
- c) Intended use.
- d) Frequency of usage.
- e) Stability characteristics.
- f) Other conditions affecting measurement.
- g) Manufacturer's recommendations.

Portable measuring and test equipment are calibrated by standards which are at least four times as accurate as the portable measuring and test equipment, unless limited by the state of the art.

Status of calibration for measuring and test equipment is provided through the use of tags, stickers, labels, routing cards, computer programs, or other suitable means. The status indicators indicate the date recalibration is due or the frequency of recalibration.

Special tools such as torque wrenches, calipers, and micrometers are calibrated to be at least as accurate as the application(s) for which it is used, using standards which are at least as accurate as the special tool being calibrated.

Installed measuring and test instruments are calibrated by instruments at least as accurate as the installed, unless limited by the state of the art.

Reference and transfer standards are traceable to nationally recognized standards; or where national standards do not exist, provisions are established to document the basis for the calibration.

Measures are required to be taken and documented to determine the validity of previous inspections and test results, if the measuring and test equipment is found to be out of calibration.

17.3.2.10 Inspection, Test, and Operating Status

Procedures define requirements for the identification and control of the inspection, test, and operating status of safety-related structures, systems, and components.

These procedures include the application, removal, and verification of inspection and welding stamps, or other status indicators as appropriate.

Measures are established for indicating the operating status of structures, systems, and components. These measures include the use of checklists, computer programs, logs, stickers, tags, labels, record cards, and test records to indicate the acceptable operating status of installed equipment. Installed equipment which, if operated, could cause damage to other equipment/systems or to personnel is tagged to indicate its non-operational status and to prevent inadvertent use.

Selected plant procedures and subsequent revisions receive separate technical review to ensure required inspections, tests, and other critical operations are included.

Altering the sequence of required tests, inspections, and safety-related operations can only be accomplished by methods outlined in procedures.

17.3.2.11 Special Process Control

Procedures define requirements for the control of special processes, such as welding, heat treating, and nondestructive examination.

Procedures require that special processes be performed by qualified personnel using proper equipment and in accordance with written qualified procedures. These personnel and procedures are to be qualified in accordance with applicable codes, standards, and specifications as described in procedures. Qualification records of special process procedures and personnel performing special processes are maintained and available for verification.

17.3.2.12 Inspection

Procedures define requirements for an inspection program to verify conformance to performance and quality requirements specified for those activities and services.

Inspections are performed by personnel who are not directly responsible for performing or supervising the activity being inspected. Inspection personnel are qualified in accordance with applicable codes and standards, and their qualifications and certifications are maintained current.

Inspections are performed in accordance with procedures or other documents which provide for the following:

- a) Identification of individuals or groups responsible for performing the inspections.
- b) Identification of characteristics and activities to be inspected.
- c) Acceptance criteria.
- d) Inspection techniques
- e) Recording the results of the inspection, review of the results, and identification of the inspector.

- f) Indirect control by monitoring of processing methods, equipment, and personnel when direct inspection is not possible.

Procedures identify inspection holdpoints, beyond which work may not proceed until inspected.

When acceptance criteria are not met, the condition will be documented in accordance with the applicable department's corrective action program procedures and reinspected or evaluated, as appropriate.

17.3.2.13 Corrective Action

Procedures define requirements for a corrective action program that charges personnel working at or supporting the nuclear plants with the responsibility to identify adverse conditions (including conditions adverse to quality).

Procedures include requirements for verification of the acceptability of the rework/repair of items by reinspection and/or testing in accordance with the original inspection or test requirements or by an accepted alternative inspection and testing method.

Conditions that require rework/repairs are identified through the use of maintenance work request forms.

17.3.2.14 Control of Documents

Procedures define requirements for the development, review, approval, issue, use, revision, and control of documents. These procedures define the scope of which documents are to be controlled.

Procedures require the identification of those individuals or organizations responsible for reviewing, approving, and issuing documents and revisions thereto.

Changes to documents are reviewed and approved by the same organization that performed the original review and approval or by other designated qualified responsible organizations.

Controlled documents are to be available at the location where the activity will be performed prior to commencing the work, except in a radioactive contaminated area where the documents will be readily available.

A document control system has been established to identify the current revision number of instructions, procedures, specifications, and drawings.

Superseded documents are controlled to prevent inadvertent use.

17.3.2.15 Records

The program requires that sufficient records be maintained to provide documentary evidence of the quality of items and the accomplishment of activities affecting quality.

Procedures define requirements for the identification, collection, and storage of quality assurance records.

Records are identifiable and retrievable through the use of indexes and filing systems, which are required by the program.

Procedures are required to be developed to indicate responsibilities and retention periods.

Records are maintained within structures designed to prevent destruction, deterioration, or theft. These facilities ensure protection against destruction by fire, flooding, theft, and deterioration by the environmental conditions of temperature and humidity.

17.3.3 ASSESSMENT

17.3.3.1 Methodology

The overall objective at CP&L is to encourage ownership, involvement, and dedication by each individual supporting the Nuclear Program. This involves continually and aggressively looking for ways to improve the overall performance and safety at each plant. This approach of identifying and correcting conditions early, requires active support by management and employees.

A process of assessment is an attitude by personnel that the CP&L Nuclear Program is improving on a continual basis. This process, along with an effective corrective action program, ensures that conditions are identified early, corrected promptly and effectively before becoming significant quality or safety problems.

Personnel responsible for carrying out the assessment functions, including safety committee activities, nuclear safety reviews, verifications, self-assessment and independent assessments, are cognizant of day-to-day activities, events, and have necessary experience to act in a management advisory function.

Assessment activities are accomplished using processes or procedures of a detail needed to accomplish the function based on complexity and importance to safety.

The managers of functions that support the Nuclear Program are responsible for ensuring that self-assessment activities and processes are implemented within their functions on a continuing basis.

17.3.3.2 Self-Assessment

It is the management expectation that individuals and organizations self-assess their end products. Adverse conditions identified during self-assessment activities are reported and resolved in accordance with the corrective action program.

Line Organization

Each individual, work group, and manager should be alert and open for areas that may need improvement.

Members of the line organization are charged with the responsibility to continually evaluate their activities and use each opportunity to achieve higher standards of quality and improved performance.

Planned and periodic self-assessment activities focus on how well the integrated quality assurance program is working and is to identify conditions that hinder the organization from achieving its safety, quality, and performance goals and standards.

Nuclear Services Department

The Nuclear Services Department shall monitor specific functional areas, along with the line organization management, to determine that desired levels of performance are being achieved. Individuals assigned these duties shall work with each nuclear project to improve implementation of CP&L's Nuclear Programs and processes to support safe and reliable operation.

17.3.3.3 Independent Assessment

The Nuclear Assessment Department (NAD) is responsible for conducting independent assessments of functions and activities affecting the nuclear programs at CP&L.

Organization

Personnel performing independent assessment activities are organizationally independent of the function/area being assessed and generally have no direct responsibilities in the area being assessed. However, on an exception basis, personnel in the NAD may provide assistance to the line organization by participating in ad hoc committees or analyzing specific technical issues, if such assistance is deemed to be in the overall best interest of safety and is approved by NAD management.

Selection of assessment personnel is based on experience and/or training that establishes that their qualifications are commensurate with the complexity or special nature of the area being assessed. The process for qualification of personnel to perform and lead assessments is established in procedures.

Personnel performing assessments shall have access to records, procedures, and personnel to gather data.

Assessment Process/Elements

A primary objective of the NAD is to assess the effectiveness of the line organization's self-assessment processes.

The assessment process includes gathering data, analyzing data, focusing on selected issues and identifying deficiencies to desired performance. The results of assessments are communicated to management in a manner that causes action to correct deficiencies and develop action to prevent recurrence. In addition, this process should evaluate corrective measures adopted to eliminate the deficiencies identified.

Data is gathered using performance based techniques during:

- o Observations of work activities,
- o Interviews,
- o Reviews of documents to gather information (including the use of NRC, INPO, and other agency evaluations),
- o Review of self-assessment data and reports (performance indicators, trend reports, etc.)
- o Nuclear Safety Review activities,
- o Team assessments (functional, site/department, corporate),
- o Analysis of plant data and reports (including adverse condition reports, etc.)

Planning activities identify the organizations to be evaluated, the characteristics to be focused on during the assessment, and the applicable acceptance criteria. Assessment activities are selected with flexibility based on various factors. These factors include but are not limited to: importance to safety and reliability, NAD assessments of site work activities, time since last assessment, plant management perspective, outside agency audits, and problem areas identified from industry and CP&L experience.

Preparation activities may include a review of performance data, relevant documentation, previous assessment data, industry experience, team member experience, and management input. These activities enable the team to focus on significant issues which may impact safety and reliability when analyzing data.

Assessments are scheduled on the basis of the status and safety importance of the activities or processes being performed. The schedule is flexible and dynamic to allow assessment to be changed depending on plant conditions, events, or issues raised by Senior management.

Functions/areas to be assessed include:

- o Plant Operations
- o Maintenance
- o Radiological Controls
- o Chemistry
- o Environmental Monitoring
- o Engineering/Technical Support
- o Fire Protection
- o Security
- o Emergency Preparedness
- o Nuclear Fuel
- o Outage Management
- o Other functions/areas requested by Senior Management

Assessments of these functions/areas may include portions of:

- o Conformance to provisions contained within the Technical Specifications and applicable license conditions
- o Operating experience
- o Procedures
- o Training and qualifications
- o Support activities
- o Corrective actions
- o Other activities deemed necessary to assure adequate performance

Results

Adverse conditions are reported in accordance with the applicable department's corrective action program procedure or by formal correspondence between responsible levels of management.

Independent assessment results are communicated to line management to allow for timely action to address potential problems or recognize strengths and superior performance.

Independent assessment results are documented and reviewed with management personnel responsible for the areas assessed.

Results of assessments, special investigations, and analysis of data will be provided to the Nuclear Assessment Department (NAD) Management for review. A summation of assessment perspective, along with potential issues and recommendations shall be presented to the Executive Vice President - Power Supply and Senior Vice President - Nuclear Generation Group on an approximately bimonthly frequency.

Follow-up is accomplished to assure that corrective action is taken as a result of the assessment and that deficient areas are reassessed, when necessary, to verify implementation of adequate corrective actions.