



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

June 25, 2015
NOC-AE-15003269
File No.: G09.19
10CFR50.54(a)
STI: 34150943

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Submittal of Operations Quality Assurance Plan Change QA-082

STP Nuclear Operating Company (STPNOC) submits the attached change to revision 21 of the Operations Quality Assurance Plan (OQAP). These changes provide the necessary revision to Chapter 1.0 of the OQAP to incorporate an organizational realignment.

This change 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 Mr. R. M. Scarborough at (361) 972-7392 or Randall Exum at (361) 972-7099.

A handwritten signature in black ink, appearing to read "Dennis L. Koehl".

Dennis L. Koehl
President and CEO

Attachment: Operations Quality Assurance Plan change QA-082

Q004
nrk

cc:

(paper copy)

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Lisa M. Regner
Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North (O8H04)
11555 Rockville Pike
Rockville, MD 20852

NRC Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

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

(electronic copy)

Morgan, Lewis & Bockius LLP
Steve Frantz, Esquire

U.S. Nuclear Regulatory Commission
Lisa M. Regner

NRG South Texas LP
John Ragan
Chris O'Hara
Jim von Suskil

CPS Energy
Kevin Pollo
Cris Eugster
L. D. Blaylock

Crain Caton & James, P.C.
Peter Nemeth

City of Austin
Cheryl Mele
John Wester

Texas Dept. of State Health Services
Richard A. Ratliff
Robert Free

CHANGE QA-082
SUMMARY OF CHANGES
Page 1 of 1

CHAPTER	LOCATION	ACTION	TEXT
TOC	CH 1.0	INSERT	QA-082
CH 1.0	5.3	DELETE	performance improvement and
	5.3.1	DELETE	performance improvement and
		INSERT	(Note during any periods that this position is not filled, the Manager, Quality Assurance will report directly to the Executive Vice President and Chief Administrative Officer.)

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN TABLE OF CONTENTS		NUMBER Chapter TABLE OF CONTENT	REV. NO. 21
		PAGE 1 OF 2	
		EFFECTIVE DATE 02-01-14	

Chapter Number	Title Chapter	Effective Revision	Effective Date	Change Notice No.
	Definitions	10	2-1-14	
1.0	Organization	17	2-1-14	QA-081 QA-082
2.0	Program Description	19	2-1-14	
3.0	Conduct of Operation	9	2-1-14	
4.0	Qualification, Training, and Certification of Personnel	7	2-1-14	
5.0	Maintenance, Installation of Modifications, and Related Activities	6	2-1-14	
6.0	Design and Modification Control	11	2-1-14	
7.0	Procurement	14	2-1-14	
8.0	Control and Issuance of Documents	7	2-1-14	
9.0	Control of Material	7	2-1-14	
10.0	Inspection	12	2-1-14	
11.0	Test Control	9	2-1-14	
12.0	Instrument and Calibration Control	7	2-1-14	
13.0	Control Of Conditions Adverse to Quality	15	2-1-14	
14.0	Records Control	9	2-1-14	

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN TABLE OF CONTENTS	NUMBER Chapter TABLE OF CONTENT	REV. NO. 21
	PAGE 2 OF 2	
	EFFECTIVE DATE 02-01-14	

Chapter Number	Title Chapter	Effective Revision	Effective Date	Change Notice No.
15.0	Quality Oversight Activities	14	2-1-14	
16.0	Independent Technical Review	13	2-1-14	QA-081
17.0	ASME Code Section XI – Repairs and Replacements	11	2-1-14	
18.0	ASME Code Section XI – Inservice Inspection and Testing	12	2-1-14	
19.0	Administrative Controls	6	2-1-14	QA-081
20.0	Dry Cask Storage System and Independent Spent Fuel Storage Installation	1	2-1-14	

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION	NUMBER Chapter 1.0	REV. NO. 17
	PAGE 1 OF 5	
	EFFECTIVE DATE 02-01-14	

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).

3.0 DEFINITIONS

- 3.1 None

4.0 REFERENCES

- 4.1 None

5.0 RESPONSIBILITIES

- 5.1 The STPNOC organization includes the Executive Vice President and Chief Administrative Officer, Executive Vice President and Chief Financial Officer, and the Senior Vice President, Operations. 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 Executive Vice President and Chief Administrative Officer is responsible for implementing quality program requirements applicable to the following functions: information technology, nuclear oversight (quality assurance), plant protection, emergency response, cyber security, access authorization, and fitness for duty. The management of these functions report to the Executive Vice President and Chief Administrative Officer.

QA-081

QA-081, QA-082

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION	NUMBER Chapter 1.0	REV. NO. 17
	PAGE 2 OF 5	
	EFFECTIVE DATE 02-01-14	

5.3.1 The Manager, Nuclear Oversight is responsible for implementing quality program requirements applicable to quality assurance. The management of this function reports to the Manager, Nuclear Oversight. (Note during any periods that this position is not filled, the Manager, Quality Assurance will report directly to the Executive Vice President and Chief Administrative Officer.)

5.3.1.1 The Manager, Quality Assurance 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

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.

5.3.1.2 The Manager, Nuclear Oversight and the Manager, Quality Assurance, at their discretion, have unfettered access to the President and Chief Executive Officer and the Board of Directors.

5.3.1.3 The Manager, Nuclear Oversight and the Manager, Quality Assurance 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.

QA-081, QA-082

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION	NUMBER Chapter 1.0	REV. NO. 17
	PAGE 3 OF 5	
	EFFECTIVE DATE 02-01-14	

- 5.3.2 The Director, Information Technology is responsible for implementing quality program requirements applicable to the following functions: information technology, cyber security and records management. The management of these functions report to the Director, Information Technology.
- 5.3.3 The General Manager, Human Resources, Knowledge Transfer & Organizational Development is responsible for implementing quality program requirements applicable to fitness for duty and access authorization. The management of this function reports to the General Manager, Human Resources, Knowledge Transfer & Organizational Development.
- 5.4 The Senior Vice President, Operations is responsible for implementing quality program requirements applicable to the following functions: generation, engineering, and projects. The management of these functions report to the Senior Vice President, Operations.
- 5.4.1 The Site Vice President 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, training, and regulatory affairs. The senior management of these functions report to the Site Vice President.
- 5.4.1.1 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. 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.

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION	NUMBER	REV.
	Chapter	NO.
	1.0	17
	PAGE 4 OF 5	
	EFFECTIVE	
	DATE 02-01-14	

5.4.2 The General Manager, Engineering is responsible for implementing quality program requirements applicable to the following functions: design engineering, testing/program engineering, systems engineering, maintenance engineering, and nuclear fuel & analysis (includes risk management). The management of these functions report to the General Manager, Engineering.

5.4.2.1 The Manager, Nuclear Fuel & 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, and 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.

5.4.3 The General Manager, Projects is responsible for implementing quality program requirements applicable to the following functions: strategic projects, engineering projects, outage management, and major projects. The management of these functions report to the General Manager, Projects.

5.5 The Executive Vice President and Chief Financial Officer is responsible for implementing quality program requirements applicable to contracts & procurement. The management of this function reports to the Executive Vice President and Chief Financial Officer.

SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION	NUMBER Chapter 1.0	REV. NO. 17
	PAGE 5 OF 5	
	EFFECTIVE DATE 02-01-14	

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