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DUKE POWER

July 11, 1996

U. S. Nuclear Regulatory Commission
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SUBJECT: McGuire Nuclear Station Units 1 & 2
Docket Nos. 50-369, 50-370

Catawba Nuclear Station Units 1 & 2
Docket Nos. 50-413, 50-414

Oconee Nuclear Station Units 1, 2, & 3
Docket Nos. 50-269, 50-270, 50-287

Duke Nuclear Quality Assurance Program

Pursuant to 10 CFR 50.54(a)(3) please find attached Amendment 21 to the Duke Power Company Topical Report Duke-1-A, Quality Assurance Program. Amendment 21, which has been implemented pursuant to 10 CFR 50.54(a)(3), contains: 1) A major revision of the sections which address procurement, identification, control, handling, storage, and shipping of materials items; 2) Changes to the qualifications for lead auditor certification; 3) A deletion of the section addressing the Integrated Safety Assessment; and 4) Other clarifications and additions to the Duke Quality Assurance Program. The changes contained in Amendment 21 have been determined to not reduce the commitments currently in the Duke Quality Assurance Program. The contents of Amendment 21 are listed and discussed in Attachment 1 and identified by indicator bars on the left margin of Attachment 2.

Please direct questions on this matter to J. S. Warren at
(704) 382-4986.

Very truly yours,

M. S. Tuckman

M. S. Tuckman

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U. S. Nuclear Regulatory Commission
July 11, 1996
Page 2

MST/JSW

Attachment 1: Listing and Discussion of the Changes Contained in
Amendment 21 (9 Pages)

Attachment 2: Amendment 21 of Topical Report Duke-1,
Quality Assurance Program (Title Page through
Page 17-46)

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ATTACHMENT 1
Duke Power Company Topical Report, Duke-1
Quality Assurance Program, Amendment 21
Listing and Discussion of Amendment 21 Contents

Item 1

Pages: xi, xii, xiii

Section: List of Effective Pages and List of Amendments

Description of Change: Updated List of Effective Pages and List of Amendments to include Amendment 21.

Reason/Basis: The List of Effective Pages (Pages xi and xii); and the List of Amendments (Page xiii) are revised as necessary for the implementation of Amendment 21.

Item 2

Page: 17-3

Section: 17. Quality Assurance, Definitions

Description of Change: Added software development as an additional example of supplier activities listed under the definition of "Services".

Reason/Basis: This addition recognizes that software is now an example of supplier-provided services procured by Duke Power. This change only updates the Topical Report to include software. This change does not affect the existing quality programs for software.

Item 3

Page: 17-8

Section: Table 17-1, Conformance of Duke Power Program to Quality Assurance Standards, Requirements and Guides

Description of Change: Revised the qualifications for the Fire Protection Engineer contained in Table 17-1 in the *Remarks* column for Regulatory Guide 1.88 Rev (2).

Reason/Basis: To provide consistency with the personnel qualifications contained in NUREG-800, Standard Review Plan, for the position responsible for the formulation and implementation of the fire protection program. Conformance with the referenced standard (ANSI N45.2.9-1974) is maintained.

Item 4

Page: 17-9

Section: Table 17-1, Conformance of Duke Power Program to Quality Assurance Standards, Requirements and Guides

Description of Change: Revised an incorrect reference from 17.3.3.2.8, Suppliers, to 17.3.3.2.6, Self-Initiated Technical Audit in the *Remarks* column for Regulatory Guide 1.144 Rev (1).

Reason/Basis: This is an administrative change being made to clear an incorrect reference.

Item 5

Page: 17-9

Section: Table 17-1, Conformance of Duke Power Program to Quality Assurance Standards, Requirements and Guides

Description of Change: Changed the Conformance Status for Regulatory Guide 1.146 Rev (0) from "Conforms" to "Alternative" as described in the *Remarks* column.

Reason/Basis: The proposed change continues to require demonstrated performance by the individual prior to certification as a lead auditor, but provides management the flexibility to certify the individual once skills have been demonstrated. This is considered to be consistent with 10CFR50, Appendix B, Criterion XVIII, *Audits*, which requires audits to be performed by appropriately trained personnel. This flexibility will allow management to assign personnel possessing significant nuclear experience to the audit function in a more timely manner. This is considered an enhancement to the audit program.

Item 6

Pages: 17-14, 17-16, 17-17, 17-20, 17-21, and 17-37

Sections: 17.3.1.2.1, Corporate Organization; 17.3.1.2.6, Information Technology Services (ITS) Department; 17.3.1.2.8, Department Interfaces; Figure 17-2, Corporate Organization; Figure 17-3, Off-Site Organization; and 17.3.2.14, Document Control

Description of Change: Changed Information Technology Services (ITS) Department to Information Management (IM) Department.

Reason/Basis: This is an administrative change only affecting organizational considerations. There is no impact on the quality assurance program since the change only addresses the title of the organization that is designated to perform the covered activities. The personnel qualifications remain the same.

Item 7

Page: 17-16

Section: 17.3.1.2.5, Procurement, Services and Materials (PSM) Department

Description of Change: Changed General Manager Purchasing to General Manager, Corporate Materials Management and changed Manager, Technical Services to Manager, Business & Technical Services. Added discussion of responsibility related to central storage facilities.

Reason/Basis: This change updates the Topical Report to be consistent with the current Duke organization. This is an administrative change that only affects organizational considerations for the, Procurement, Services and Materials Department. There is no impact on the quality assurance program.

Item 8

Page: 17-16

Section: 17.3.1.2.7, Power Delivery Department

Description of Change: Revised the department responsibility and reportability description.

Reason/Basis: This is an administrative change that only affects organizational considerations for the Power Delivery Department. There is no impact on the quality assurance program.

Item 9

Page: 17-17

Section: 17.3.1.2.8, Department Interfaces

Description of Change: Added a description of the control of interfaces used for quality related activities performed by the Power Delivery Department.

Reason/Basis: This is considered an administrative change that only affects the description of the organizational interface agreements with the Power Delivery Department. The quality of affected manuals or procedures is not lessened by this change.

Item 10

Page: 17-22

Section: Figure 17-4, Nuclear Site Organization

Description of Change: Revised the Commodities and Facilities Management organization chart.

Reason/Basis: This is an administrative change only being made in order to correctly illustrate the current organization in the sites' commodities and facilities organization. There are no quality assurance program implications related to this change.

Item 11

Page: 17-24

Section: 17.3.2.2, Design Control

Description of Change: Added the On-Duty Emergency Coordinator to the list of positions authorized to approve station modifications for the Station Manager.

Reason/Basis: This is an administrative change granting approval authority to a position equivalently qualified as those positions already listed. The addition of the On-Duty Emergency Coordinator will provide the sites with more flexibility to obtain desired approvals during emergency situations and off-hours during the absence of the Station manager. There is no impact on the quality assurance program since the personnel qualifications are equivalent.

Item 12

Pages: 17-26 through 17-31

Sections: 17.3.2.4, Procurement Control; 17.3.2.5, Procurement Verification; 17.3.2.6, Identification and Control of Items; and 17.3.2.7, Handling, Storage, and Shipping

Description of Change: These sections have undergone extensive revision and have been rewritten to better describe the Duke procurement process. Changes deemed to warrant individual discussion are listed in the Basis for this proposed change.

Reason/Basis: These changes primarily address organizational, responsibility, and procedural aspects of procurement activities and material control activities. Specific changes/bases are:

- a. In Section 17.3.2.4 (Pages 17-26 and 17-27), the description of the program for basic components commercial grade items was revised. The basis for this change is to provide consistency with the current version of 10CFR21.
- b. In Section 17.3.2.4 (Page 17-27), the requirements for placement on the Duke approved Suppliers List are being changed to permit placement to occur without performance of an audit by Duke or a pre-award survey. The placement is to be based on acceptance of an audit performed by another licensed nuclear utility (or a joint utility audit), supplier possession of appropriate ASME certification or other assurance of product quality, and management review of information and approval.
- c. In Section 17.3.2.4 (17-27), an addition is made to permit a six-month grace period (with management approval) in the requirements/frequency for supplier re-evaluation. The present triennial audit requirement may be extended by six months (to 42 months) with written management approval. The purpose of this change is only to provide scheduling flexibility and is not intended to become standard practice or to be repetitively applied.

Item 13

Page: 17-36

Section: 17.3.2.13, Corrective Action

Description of Change: An addition was made stating that Duke now uses electronic means to track, trend, and facilitate the

Item 13 (Continued)

resolution of problems and to measure and classify nuclear performance.

Reason/Basis: For this section, this is considered an administrative change which provides a description of the media used to process information in the Duke corrective action programs. This change/addition is considered an enhancement since it replaces outdated techniques previously used in this area. The addition also supports the deletion of Section 17.3.3.2.6, Integrated Safety Assessments, as discussed in Item 26 of this document.

Item 14

Page: 17-36

Section: 17.3.2.13, Corrective Action

Description of Change: Changed Nuclear Services to Safety Assurance

Reason/Basis: This is an administrative change only affecting organizational considerations. There is no impact on the quality assurance program since the change only addresses the title of the organization that is designated to perform the covered activities. The personnel qualifications remain the same.

Item 15

Page: 17-37

Section: 17.3.2.14, Document Control

Description of Change: Changed "cover letter" to "distribution indices".

Reason/Basis: This is an administrative change only affecting the accompanying mechanism used to distribute/mail manual copies. It does not affect the determination of the recipients of the manuals or the control of the distribution process.

Item 16

Page: 17-37

Section: 17.3.2.14, Document Control

Description of Change: Deleted the reference to the Regulatory Audits Section Procedures Manual.

Reason/Basis: This information is now contained in the Nuclear Policy Manual, which is appropriately approved, as described in the newly added subsequent paragraph addressing the Assessment Organization. There is no impact on the quality assurance program.

Item 17

Page: 17-37

Section: 17.3.2.14, Document Control

Description of Change: Deleted the reference to the Nuclear Safety Review Board Procedures Manual.

Reason/Basis: This information is now contained in a nuclear system directive and is appropriately approved, as stated in the revised paragraph. There is no impact on the quality assurance program.

Item 18

Page: 17-38

Section: 17.3.2.14, Document Control

Description of Change: Deleted the reference to the Power Delivery Department Manual.

Reason/Basis: This is considered an administrative change. Procedures contained in these manuals are now located in the Nuclear Policy Manual or the ESS functional area manuals. There is no impact on the quality level since there are existing quality controls for these alternative manuals as discussed in Section 17.3.2.14 of the Topical Report.

Item 19

Page: 17-38

Section: 17.3.2.14, Document Control

Description of Change: Changed Nuclear Services to the Nuclear General Office.

Reason/Basis: This is considered an administrative change which only affects an organizational unit designation. Nuclear Services has been superseded by the Nuclear General Office in designation only. This is consistent with a previous amendment to the QA Topical Report.

Item 20

Page: 17-41

Section: 17.3.2.15, Records

Description of Change: Changed "preview" and "Purview" to "purview".

Reason/Basis: This change corrects typographical errors.

Item 21

Page: 17-43

Section: 17.3.3.2.1, Nuclear Safety Review Board

Description of Change: Changed Senior Vice President Power Generation Group to Senior Vice President Nuclear Generation

Reason/Basis: This is an administrative change. This change is consistent with the current Duke organization and is consistent with previous amendments made to the Topical Report and the stations' Technical Specifications.

Item 22

Page: 17-43

Section: 17.3.3.2.1, Nuclear Safety Review Board

Description of Change: Added "other events and trends of nuclear safety significance."

Reason/Basis: This addition describes the Nuclear Safety Review Board's re-emphasized role in the assessment of site performance from a nuclear safety point of view. This addition also supports the deletion of Section 17.3.3.2.6, Integrated Safety Assessments, the basis for which is discussed in Item 26 of this document.

Item 23

Page: 17-44

Section: 17.3.3.2.3, Internal Audits

Description of Change: Deleted, "for compliance with NSRB requirements".

Reason/Basis: This is considered an administrative change which is being made to more accurately describe the review function performed by the NSRB staff on the scope of audits. The scope of audits is defined by the stations' Technical Specifications and the audit reports are provided to the individual NSRB members for detailed review. This change has no impact on the covered activities or the quality assurance program.

Item 24

Page: 17-44

Section: 17.3.3.2.3, Internal Audits

Description of Change: Changed Integrated Safety Assessment to periodic performance trend summaries.

Reason/Basis: Section 17.3.3.2.6, Integrated Safety Assessment is being deleted, the basis for which is described in Item 26. This change is being made in support of this deletion and further demonstrates the updated manner in which assessment information is now being communicated to management.

Item 25

Page: 17-45.

Section: 17.3.3.2.5, Corporate Audit

Description of Change: Revised the description of the process used to determine the minimum scope of corporate audits.

Reason/Basis: The scope of future internal audits is to be determined by the Senior Vice President, Nuclear Generation and the audit team. This change is intended to improve the wording of the affected paragraphs and has no substantive impact on the Corporate Audit process.

Item 26

Page: 17-45

Section: 17.3.3.2.6, Integrated Safety Assessment

Description of Change: This section is being deleted.

Reason/Basis: Although the Integrated Safety Assessment (ISA) has been effective in the past, the present process has been replaced by more real-time and modern information systems now used by Duke Power to assess plant performance. The processes listed below are currently being used in place of the ISA to conduct the assessment function in a more efficient and timely manner and these items form the basis for this change to the Topical Report.

- a. A nuclear system events report is processed by the Nuclear Engineering Division on a monthly basis and measures nuclear performance. The report is issued to senior management and classifies any nuclear event or potential nuclear event on a systematic basis. The report is published electronically for all nuclear employees. This report is also provided to NSRB members for review. This process is referenced in Section 17.3.2.13.
- b. NSRB meetings are now performed more frequently, and this contributes to Duke's ability to more accurately assess current nuclear performance at the three sites. Senior management is now more involved in the NSRB activities. Identified station specific and generic problems are discussed in the NSRB meetings. Additionally, the NSRB has become more involved in the assessment of each station's events and trends of nuclear significance. This process is described in Section 17.3.3.2.1.

Item 26 (Continued)

- c. Duke has updated the investigative and corrective action processes to electronically track and trend site problems. Problems identified in this process are also considered for generic implications. Reports on problem activities are reported to senior management and the NSRB on a monthly basis. This process is referenced in Section 17.3.2.13.
- d. Data obtained from internal audits is now being provided to management through periodic trend summaries as discussed in Section 17.3.3.2.3.

Item 27

Page: 17-45

Section: 17.3.3.2.7, Self-Initiated Technical Audits

Description of Change: This section is being renumbered to 17.3.3.2.6 to account for the deletion described in Item 26.

Reason/Basis: This is an administrative change only and is required to support the implementation of Amendment 21.

Item 28

Page: 17-45

Section: 17.3.3.2.8, Suppliers

Description of Change: This section is being renumbered to 17.3.3.2.7 to account for the deletion described in Item 26.

Reason/Basis: This is an administrative change only and is required to support the implementation of Amendment 21.

ABSTRACT

This topical report describes the Duke Power Company quality assurance program for the operational phase of its nuclear power plants. The report is organized like and is generally used for Chapter 17, "Quality Assurance" of Duke's Safety Analysis Reports.

The Duke Quality Assurance Program conforms to applicable regulatory requirements such as 10CFR 50, Appendix B and to approved industry standards such as ANSI N45.2-1971 and ANSI N18.7-1976 and corresponding daughter standards, or to equivalent alternatives. The Duke Power Quality Assurance Program also conforms to the regulatory position of the NRC Regulatory Guides listed in Table 17-1 of this report with the exception of the clarifications, modifications, and alternatives stated therein.

The Duke Power Company Quality Assurance Program Policy Statement, issued by the Chairman and Chief Executive Officer, describes the corporate policy and assigns responsibility for implementation of the Quality Assurance Program.

Section "Introduction" describes the purpose of this report, provides definitions, and shows conformance to regulations, standards, and guides.

Section 17.3, "Quality Assurance Program Description" describes the quality assurance program and organization for station operation.

Section 17.3, "Quality Assurance Program Description" follows the format of NUREG-0800, "Standard Review Plan For The Review of Safety Analysis Reports for Nuclear Power Plants", Section 17.3, "Quality Assurance Program Description," except that the Duke Power Company Quality Assurance Program is based on ANSI N18.7-1976 in lieu of ANSI/ASME NQA-1 and NQA-2.

The topical is intended to be a comprehensive up-to-date description of Duke's Quality Assurance Program for nuclear power plants.

R B Priory being duly sworn states that he is President and Chief Operating Officer, of Duke Power Company; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission this amendment to its Topical Report, Duke-1-A; and that all statements and matters set forth herein are true and correct to the best of his knowledge.

RBP
R. B. Priory

ATTEST:

Maxie R. King
Maxie R. King

Subscribed and sworn to me July 11, 1996
Date

Linda Case Smith
Linda Case Smith, Notary Public

My commission expires: May 6, 2000
Date

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1	October 1, 1974 (Complete Revision)
2	February 14, 1975
3	November 22, 1976
4	June 29, 1978
5	July 14, 1981
6	February 3, 1983
7	June 22, 1984
8	May 20, 1985
9	July 30, 1985
10	October 17, 1986
11	November 12, 1987
12	March 30, 1989
13	April 18, 1990
14	August 23, 1991
15	August 7, 1992 (Complete Rewrite)
16	June 16, 1994
17	June 16, 1994
18	December 12, 1994
19	March 30, 1995
20	June 29, 1995
21	July 11, 1996

17. QUALITY ASSURANCE

INTRODUCTION

Duke Power Company maintains full responsibility for assuring that its nuclear power plants are designed, constructed, tested and operated in conformance with good engineering practices, applicable regulatory requirements and specified design bases and in a manner to protect the public health and safety. To this end Duke has established and implemented a quality assurance program which conforms to the criteria established in Appendix B to 10CFR, Part 50, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants" published June 27, 1970 (35 F. R. 10499) and amended September 17, 1971 (36 F. R. 18301) and amended January 20, 1975 (40 F. R. 3210D).

This topical report is written in the format of a Safety Analysis Report (SAR) Chapter 17, "Quality Assurance", in accordance with Revision 2 of the NRC's Regulatory Guide 1.70, "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants - LWR Edition" and subsequent NRC guidelines. The quality assurance program described herein is applicable to all Duke nuclear power plants as referenced by Chapter 17 of the plants' SAR's.

This Topical Report describes the Quality Assurance Program for those systems, components, items, and services which have been determined to be nuclear safety related (QA Condition 1). In addition, Duke's Quality Assurance Program provides a method of applying a graded Quality Assurance Program to certain non-safety related systems, components, items, and services. These are classified as QA Conditions 2, 3, or 4. This method involves defining a Quality Assurance "Condition" for each level of quality assurance required. These will be designated as "QA Condition ". The quality of systems, components, items, and services within the scope of QA Conditions 1, 2, 3, and 4 is assured commensurate with the system's, component's, item's, or service's importance to safety. The following conditions have been defined.

QA Condition 1 covers those systems and their attendant components, items, and services which have been determined to be nuclear safety related. These systems are detailed in the Safety Analysis Report applicable to each nuclear station. The Topical Report applies in its entirety to systems, components, items, and services identified as QA Condition 1.

QA Condition 2 covers those systems and their attendant components, items, and structures important to the management and containment of liquid, gaseous, and solid radioactive waste.

QA Condition 3 covers those systems, components, items, and services which are important to fire protection as defined in the Hazards Analysis for each station. The Hazards Analysis is in response to Appendix A of NRC Branch Technical Position APCSB 9.5-1.

QA Condition 4 covers those seismically designed/restrained systems, components, and structures whose continued functions are not required during and after the seismic event. The general scope of these systems, components, and structures, identified as Seismic Category II (SCII) are defined in Regulatory Guide 1.29, Seismic Design Classification.

Subsequent changes to Duke's Quality Assurance Program shall be incorporated in this topical report. The topical report is intended to be a comprehensive up-to-date description of Duke's Quality Assurance Program for nuclear power plants.

Any programmatic changes to the Quality Assurance Program will be submitted for review and acceptance prior to implementation. Significant organizational changes will be submitted no later than thirty (30) days after announcement.

DEFINITIONS

The following definitions are applicable to terms used in this report. Terms used in this report which are not defined in this section are defined in ANSI N45.2.10, "Quality Assurance Terms and Definitions."

Approver - An individual who reviews an activity for concept and conformity with codes and standards; the approver is a person other than the originator or checker.

Audit (Internal) - An activity to determine through investigation the adequacy of, and adherence to, established procedures, instructions, specifications, codes, and other applicable contractual and licensing requirements, and the effectiveness of implementation.

Checker - An individual, other than the originator or approver, who is qualified in the area being checked and who has the responsibility to check the activity and/or all revisions for completeness, clarity, and accuracy.

Designer - The individual who performed the design.

Deficiency - Any condition considered to be adverse to quality including inadequacies of personnel, procedures, systems, methods, or items.

Documents - Any written or pictorial information describing, defining, specifying, reporting, or certifying activities, requirements, procedures, or results. Examples of documents are drawings, specifications, instructions and procedures significant to the design, construction, testing, maintenance and operation of QA Condition 1 equipment and systems.

Hold Point - That point in the manufacturing, preparation, development, installation and construction, inspection, or testing process that requires witnessing or review by Duke Power surveillance personnel.

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

Nuclear Station Modification - A planned change in plant design accomplished in accordance with the requirements and limitations of applicable codes, standards, specifications, licenses and predetermined safety restrictions.

Problem Investigation Process - A process used during the operation phase of nuclear stations that documents an occurrence, situation, or nonconformance that resulted in other than expected equipment performance, personnel action, or failure to operate within established limits.

Quality Assurance - The planned and systematic actions necessary to provide adequate confidence that a material, component, system or facility will perform satisfactorily in service. (Note: See Section "Explanation of "Quality Assurance"" below for further explanation.)

Quality Assurance Records - Those records which furnish documentary evidence of the quality of items and of activities affecting quality.

Quality Assurance Requirements - Those inspection, test, examination, certification and documentation requirements which are imposed to provide objective evidence of the conformance of an item or activity to established design, engineering, standards, and code requirements.

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

Quality Control Inspector (Inspector) - Any individual certified to the requirements of ANSI N45.2.6 or SNT-TC-1A who performs required inspections, tests or examinations.

Responsible Engineer - The engineer assigned responsibility for an item or service.

Revisions - Any addition, correction, deletion or change.

Services - The performance by a supplier of activities such as design, investigation, inspection, nondestructive examination, software applications, and installation.

Preaward Survey - A documented activity performed in accordance with written procedures or checklists to verify, by examination and evaluation of objective evidence, that the quality assurance program has been developed, documented, and implemented in accordance with specified requirements.

Variation Notice - A notice to provide a process by which field variations from Design Engineering drawings and specifications are evaluated and permitted.

Supplier 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 implemented in accordance with specified requirements.

Explanation of "Quality Assurance"

Quality Assurance as used in this document includes: 1) the independent assurance activities associated with items and tasks critical to the safety and integrity of the facility and 2) quality verifications performed by the Regulatory Audits and Supplier Verification Sections and by the Nuclear Safety Review Board in the Nuclear Generation Department. The Quality Assurance program as defined above is not an alternative to good technical work. Rather, it is a system of controls to verify that quality is achieved. The Quality Assurance program places the responsibility on line management of achieving and assuring quality in all areas of their operation. As defined, the President and Chief Operating Officer has been given the responsibility to develop and manage a Quality Assurance Program for the Company.

QUALITY ASSURANCE STANDARDS AND GUIDES

The Duke Quality Assurance Program conforms to Appendix B of 10CFR 50, as discussed in Section 17, "Quality Assurance." The Quality Assurance Program also conforms to applicable NRC Regulatory Guides and approved ANSI Standards, or applicable alternatives. Table 17-1 addresses quality assurance program conformance to the referenced regulatory and program guidance contained in NUREG-0800.

Quality Assurance Program conformance with the documents identified in Table 17-1 may, however, be modified contingent upon future NRC or ANSI action. For example, if a draft document is subsequently approved and issued or if an approved document is revised, provisions of the more recent issue of such a document may be complied with in lieu of those contained in the version listed in Table 17-1, provided the more recent issue has been endorsed by the NRC. Also, formal regulatory actions of the NRC (e.g., issuance or amendment of a station's Facility Operating License) are considered to supersede the contents of Table 17-1, as applicable.

Table 17-1 (Page 1 of 7). Conformance of Duke Power Program to Quality Assurance Standards, Requirements and Guides

Standard, Requirement or Guide	Conformance Status	Remarks
Regulatory Guide 1.8 Rev (1-R) - Personnel Selection and Training	Alternative	RG 1.8 Rev (1-R) incorporates ANSI N18.1. Duke program conforms to ANSI N18.1-1971 except Radiation Protection Manager qualifications are contained in the Technical Specifications.
Regulatory Guide 1.26 Rev (3) - Quality Group Classifications & Standards for Water, Steam, and Radioactive-Waste Containing Components of Nuclear Power Plants	Alternative	Duke Program conforms to this Regulatory Guide except for additional details and directions noted in Station FSAR's.
Regulatory Guide 1.28 Rev (2) - Quality Assurance Program Requirements (Design and Construction)	Conforms	-----
Regulatory Guide 1.29 Rev (3) - Seismic Design Classification	Alternative	Duke Program conforms to this Regulatory Guide except for additional details and directions noted in Station FSAR's.
Regulatory Guide 1.30 Rev (0) - Quality Assurance Requirements for the Installation, Inspection and Testing of Instrumentation and Electric Equipment	Conforms	RG 1.30 Rev (0) incorporates ANSI N45.2.4-1972 for both construction and operation
Regulatory Guide 1.33 Rev (2) - Quality Assurance Program Requirements (Operations)	Alternative	RG 1.33 Rev (2) incorporates ANSI N18.7-1976/ANS-3.2. Duke program conforms to ANSI N18.7-1976 except the frequency of audits of selected aspects of operational phase activities is defined in Section 17.3.3, "Self Assessment" and the frequency for procedure review, as described in Section 17.3.2.14, "Document Control," is based on ANSI N18.7/ANS-3.2 (1988) with appropriate review frequencies established not to exceed 6 years.

Table 17-1 (Page 2 of 7). Conformance of Duke Power Program to Quality Assurance Standards, Requirements and Guides

Standard, Requirement or Guide	Conformance Status	Remarks
Regulatory Guide 1.36 Rev. (0) - Nonmetallic Thermal Insulation for Austenitic Stainless Steel	Adopted	Regulatory Guide is adopted for all Austenitic Stainless Steel piping and components located outside containment. Inside containment, reflective Thermal Insulation is used.
Regulatory Guide 1.37 Rev (0) - Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants	Conforms	RG 1.37 Rev (0) incorporates ANSI N45.2.1-1973 for both construction and operation
Regulatory Guide 1.38 Rev (2) - Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants	Alternative	RG 1.38 Rev (2) incorporates ANSI N45.2.2-1972. Duke program conforms to ANSI N45.2.2-1972 except container markings shall be marked on at least one side (A.3.9(1)) and shall be applied with waterproof ink or paint in characters of a legible size, and caps and plugs for pipe and fittings are required unless specified by Engineering, and off-site inspection, examination, and testing is monitored by personnel qualified to ANSI N45.2.12 in lieu of ANSI N45.2.6.
Regulatory Guide 1.39 Rev (2) - Housekeeping Requirements for Water-Cooled Nuclear Power Plants	Conforms	RG 1.39 Rev (2) incorporated ANSI N45.2.3-1973 for both construction and operation
Regulatory Guide 1.54 Rev (0) - Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants	Alternative	Catawba has adopted the Regulatory Guide. McGuire and Oconee adopt portions of the Regulatory Guide and address alternatives which meet the intent of this Guide, in each respective Station FSAR.