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 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Forwards FSAR changes to Chapter 17, including clarification of intent of Sections 17.1A.1.2.5.2 & 17.1A.6 & shifting NCR validation as job responsibility from QA & QC. Changes will be made in next FSAR update.

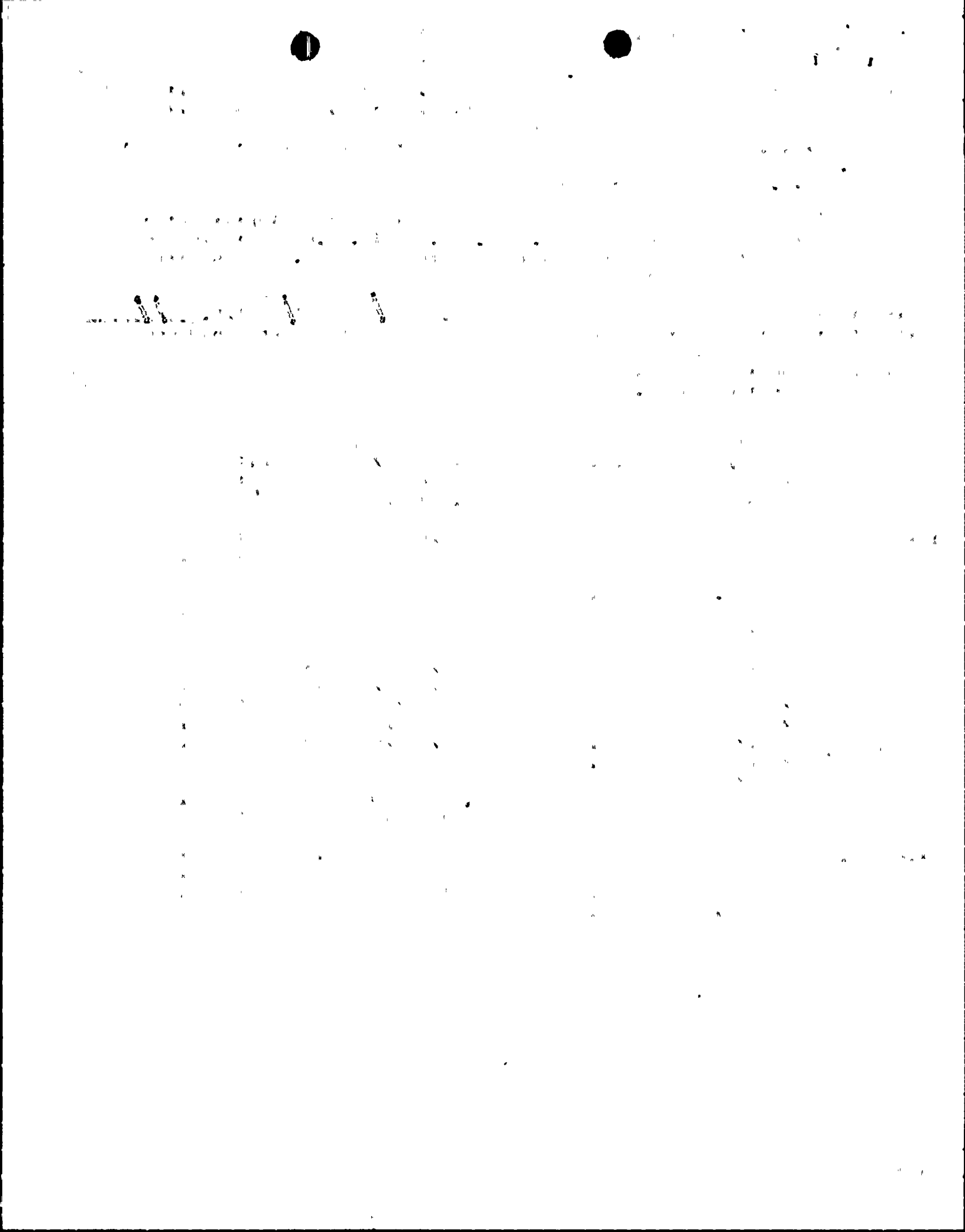
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Arizona Nuclear Power Project

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Director of Nuclear Reactor Regulation
Attention: Mr. George W. Knighton, Chief
Licensing Branch 3
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

August 30, 1985
ANPP-33311-EEVB/JKO

Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 2 and 3
Changes to PVNGS FSAR (Chapter 17)
Docket Nos. STN-50-529/530
File: 85-056-026; G.1.01.10

Dear Mr. Knighton:

Attached for your review on PVNGS Units 2 and 3 are FSAR changes to Chapter 17. These changes involve: (1) responsibility for the development and maintenance of the classification of Safety Related items from PVNGS Engineering Department to ANPP Engineering Department; (2) clarification of the intent of Sections 17.1A.1.2.5.2 and 17.1A.6; (3) shifting NCR validation as a job responsibility from QA to QC.

We believe these changes to be justified because: (1) this change aligns the FSAR and ANPP policy; (2) clarification was necessary due to the review of the last amendment; (3) the same amount of validation will take place for NCR's.

For PVNGS Unit 1, safety reviews and evaluations have been completed for implementation of these changes in accordance with the requirements of 10CFR 50.59. The safety reviews and evaluations have determined that there are no unreviewed safety questions involved with these changes. These changes will be included in the next FSAR update.

If you have any questions concerning these changes, please contact William Quinn of my staff.

Very truly yours,

E. E. Van Brunt, Jr.
Executive Vice President
Project Director

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EEVB/JKO/slh
Attachment

cc: E. A. Licitra
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A. C. Gehr

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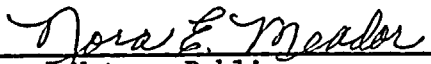
STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, Edwin E. Van Brunt, Jr., represent that I am Executive Vice President, Arizona Nuclear Power Project, that the foregoing document has been signed by me on behalf of Arizona Public Service Company with full authority to do so, that I have read such document and know its contents, and that to the best of my knowledge and belief, the statements made therein are true.



Edwin E. Van Brunt, Jr.

Sworn to before me this 30 day of August, 1985.



Notary Public

My Commission Expires:

My Commission Expires April 6, 1987



1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100



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SARCN Nos. 2013, 2031, 2037

QUALITY ASSURANCE DURING
THE OPERATIONS PHASE17.2.2.7 Applicability of Codes, Standards and
Regulatory Guides

The Operations Quality Assurance Program has been developed, to the extent practical, in accordance with approved NRC Regulatory Guides and ANSI Standards. The requirements for the Operations Quality Assurance Program are described in table 17.2-1. Implementation of those requirements for specific quality-related activities is the responsibility of those who are responsible for the activity. Prior to receipt of an Operating License for the PVNGS, changes to conformance with those Quality Assurance Standards and Guides identified in table 17.2-1 must be reviewed and accepted by the Director, Corporate QA/QC. After receipt of an Operating License for the PVNGS, changes to the requirements described in table 17.2-1 must be reviewed in accordance with the requirements of the Technical Specifications. Such changes will be accepted by the Corporate Quality Assurance Department prior to implementation.

17.2.2.8 Safety-Related Structures, Systems, and
Components Controlled by the Program

Table 3.2-1 identifies the safety-related structures, systems, and components to which the Operations Quality Assurance Program applies. Certain components or parts within the identified envelopes may not be safety-related. Such components or parts will not be identified as safety-related in the detailed list described in the paragraph below.

QUALITY ASSURANCE DURING
THE OPERATIONS PHASE

The structures, systems, and components listed in table 3.2-1 are further broken down to identify systems and components to which the Operations Quality Assurance Program applies. The classification of safety-related items is developed and maintained by the ^{ANPP NUCLEAR} PVNGS Engineering Department.

Prior to receipt of an Operating License for the PVNGS, changes to table 3.2-1 must be reviewed and accepted by the Director, Corporate QA/QC and the Director, Technical Services.

After receipt of an Operating License for the PVNGS, changes to table 3.2-1 must be reviewed in accordance with the requirements of the Technical Specifications. Such changes will be accepted by the Corporate Quality Assurance Department prior to implementation.

17.2.2.9 Suppliers and Contractors

APS requires contractors and suppliers of equipment, materials, and services which could affect the quality of safety-related structures, systems, and components or who perform quality-related activities to establish and implement QA programs. These QA programs shall include provisions which are consistent with the Operations Quality Assurance Program. Alternatively, they may be required to perform work in accordance with APS approved procedures. APS responsibilities with respect to these programs will be exercised through review of their QA programs, monitoring verification or audit, as appropriate, by the Corporate Quality Assurance Department to assure compliance with the procurement document and applicable sections of 10CFR Part 50, Appendix B.

QUALITY ASSURANCE

- H. Review changes to Bechtel's prequalified bidders list and provide concurrence as deemed appropriate.

The APS Corporate QA Department is organized into departments as shown in the organization chart in figure 17.2-1.

Responsibilities of the APS Corporate QA Department include quality assurance functions relating to engineering, design, procurement and construction of PVNGS. Therefore, these APS Corporate QA departments are described below.

17.1A.1.2.5.1 Quality Systems and Engineering. The Quality Systems and Engineering Department, through the Quality Systems and Engineering Manager, has the responsibility to assist the Director, Corporate QA/QC in the implementation of the APS QA Program. The Quality Systems and Engineering Manager reports directly to the Director, Corporate QA/QC. He is responsible to:

- A. Develop, maintain, issue, review and/or control programs and procedures required for the implementation of the APS QA Program, including the Operations Quality Assurance Criteria Manual, and the APS Quality Assurance Manual for Design and Construction;
- B. Review quality documents as necessary for incorporation and adequacy of quality requirements.

17.1A.1.2.5.2 Procurement Quality Department. The Procurement Quality Department, through the Procurement Quality Manager, has the responsibility to assist the Director, Corporate QA/QC in the implementation of the APS QA Program by monitoring the procurement activities of Bechtel and Combustion Engineering. The Procurement Quality Manager reports directly to the Director, Corporate QA/QC, by monitoring or auditing procurement, receiving, inspection and storage activities.

* THE RESPONSIBILITIES OF THE PROCUREMENT QUALITY MANAGER INCLUDES

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QUALITY ASSURANCE

Bechtel and CE documents are identified in sections 17.1B and 17.1C, respectively.

17.1A.6 DOCUMENT CONTROL

APS QA Program requires that organizations with responsibility for documents which prescribe activities affecting quality establish and implement document control measures. The procedures which have been established by APS to implement the requirements for document control are identified in the APS QA manual. These procedures identify the format and content requirements for documents; the responsibilities for preparation, review, approval and revision to documents; the document identification systems used by APS; the measures to control issuance and distribution, receipt, filing and storage, use and disposition. Documents include drawings; design specifications, calculations, engineering studies, vendor data, test procedures, design criteria, Q-List, PSAR/FSAR and QA programs and procedures.

The procedures which have been established by Bechtel and CE to implement the requirements for document control are described in sections 17.1B and 17.1C.

The Director, Corporate QA/QC is responsible for the maintenance, issuance and control of the APS QA Manual. The Director, Corporate QA/QC is also responsible for the issuance of instructions which delineate the performance of activities by APS Corporate QA personnel.

The Director, Technical Services is responsible for the preparation of document control procedures for the Technical Services Departments, where there is responsibility for the issuance, review, and/or acceptance of documents. ~~Such activities include review and comment on design documents issued by Bechtel; review and comment on procurement documents prepared by Bechtel; review of acceptance and qualification test procedures; and review and comment on changes to previously accepted documents.~~ These

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Such activities include review and comment on design documents issued by Bechtel; review and comment on procurement documents prepared by Bechtel; review and comment on field design and procurement documents; review of acceptance and qualification test procedures; review and comment on construction plans; and review and comment on changes to previously accepted documents.

BECHTEL QUALITY ASSURANCE DURING
DESIGN AND CONSTRUCTION

In order to assure that the quality program is sufficiently addressed, the PQAM's duties and responsibilities for the PVNGS include:

A. Review and approval of:

- Material requisitions and specifications for purchase orders and subcontracts
- Subcontractors' QA programs and manuals
- Bid evaluations/selection of project approved suppliers
- Purchase orders and subcontracts
- Selected single-line drawings and P&IDs
- Vendor inspection planning
- Construction work plans and procedures
- Site inspection planning
- Review for reportability/~~validation~~ and concurrence of nonconformance descriptions and dispositions

B. Coordinate the establishment of the project quality program

C. Overall surveillance of the project quality program and coordination of its implementation

D. Coordinate project quality-related activities of engineering, procurement, and construction and provide necessary interface during audits or inspections by off-project entities of M&QS, ANI, NRC or regulatory agencies

E. Surveillance and audit of project quality-related functions and advise management of the status of program implementation

BECHTEL QUALITY ASSURANCE DURING DESIGN AND CONSTRUCTION

The project construction team includes: Superintendents who are in direct charge of the craft; Field Engineers, who ^{validate non Q class quality class nonconformance report} perform field engineering, and provide technical guidance including in-process control inspection of construction work; field procurement personnel who are responsible for purchase of field procured items and control of materials prior to release for construction; the Field Contracts Administrator who coordinates activities in field subcontracts; the Project QA Engineer, assigned by and administratively and technically responsible to the Project QA Manager, who is responsible for coordinating the QA program; and Field QC Engineers, assigned by and administratively and technically responsible to the Chief Construction QC Engineer. The Field QC Engineers are responsible for the field QC program, including performance of all quality verification inspection. Field QC is coordinated by the Project Field Construction Manager. Figure 17.1B-10 shows the organization of the project construction team.

Field QC is the responsibility of the Project QC Engineer whose responsibilities include:

- A. Perform all jobsite quality verification inspection
- B. Prepare jobsite QC documentation and maintain construction QC records
- C. Perform surveillance of subcontractors' quality programs and review of subcontractor's quality verification documentation
- D. Provide technical direction to testing laboratories and inspection subcontractors
- E. Administer the nonconforming material control systems, and verify acceptance of rework and repairs in accordance with nonconformance dispositions.
- F. Review supplier quality verification documentation package(s) for completeness and traceability to the item(s)

validate nonconformance reports for
Quality Class "Q",

