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AUTH.NAME AUTHOR AFFILIATION
UHRIG,R.E. FLORIDA POWER & LIGHT CO.
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. OPERATING REACTORS BRANCH 1

SUBJECT: UPDATES & CLARIFIES COMMITMENT TO IMPLEMENT OPERATIONAL QA PROGRAM.QUESTIONS STATUS OF REG GUIDE & INDUSTRY STANDARDS RE QA PROGRAM.

DISTRIBUTION CODE: Q001S COPIES RECEIVED:LTR 1 ENCL 1 SIZE: 2
TITLE: QUALITY ASSURANCE DIST. FOR REPORT UNDER REVIEW.

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	08 AD SYS/PROJ	1	1	09 I&E	6	6
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	17 RES	1	1	ADV REAC BR	1	0
	ASLB	1	0	DIRECTOR DPM	1	0
	DOR	1	0	DSE	1	0
	DSS	1	0	EEB	1	0
	EMERGCY PLAN BR	1	0	ENGINEERING BR	1	0
	LWR#1 CHIEF	1	0	LWR#2 CHIEF	1	0
	LWR#3 CHIEF	1	0	LWR#4 CHIEF	1	0
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P. O. BOX 013100, MIAMI, FL 33101

FLORIDA POWER & LIGHT COMPANY

March 9, 1979
L-79-56

Office of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Operating Reactors Branch #1
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Schwencer:

Re: Turkey Point Plant Unit Nos. 3 and 4
Docket Nos. 50-250 and 50-251
Operational Quality Assurance Program

In a September 10, 1976, letter to Mr. George Lear, Florida Power & Light Company committed to implement an operational QA program at Turkey Point Units 3 and 4 as described by the attachment to that letter and by the Florida Power & Light Company Topical Quality Assurance Report (FPLTQAR 1-76A). The purpose of this letter is to update and clarify that commitment.

Two revisions to the Topical Quality Assurance Report have been issued. The Topical Quality Assurance Report Revision 2 as modified by our letter to Mr. Lear of September 10, 1976 (L-76-331) is currently in effect at Turkey Point Units 3 and 4. We will notify you as we implement future revisions of the Topical Quality Assurance Report at Turkey Point.

Some questions were raised relative to the status of the Regulatory Guides and industry standards listed in Appendix C of our Topical Quality Assurance Report. Revision 2 to our Topical Quality Assurance Report was designed to clarify the relationship of these Regulatory Guides and industry standards to our QA Program, and is quoted in part as follows:

> "The Regulatory Guides, codes, and standards specifically listed in the matrix of this appendix (on page 2) represent the baseline guidance used in the preparation of FPL's QA Manual and this topical report. These guidance documents, therefore, provide the basis for the FPL QA Program, but they are not considered to be part of the QA Program unless specifically addressed in the applicable SAR, technical specifications, etc.
>
> The FPL Quality Assurance Program generally meets the intent of the documents referenced in this appendix. Any exceptions taken to the intent of a guidance document, and equivalent FPL alternatives to such exceptions are stated on pages subsequent to the second page of this appendix."

However, it appears that some misunderstanding still exists, particularly with regard to the establishment of the basis for NRC inspection activities. Accordingly, we consider it appropriate to resume the dialogue on this subject until full mutual understanding and agreement exists.

It is FPL's QA policy to generally meet the intent of the Regulatory Guides and industry standards referenced in Appendix C, with exceptions as approved by the NRC Office of Nuclear Reactor Regulation. The resulting QA Program documents which have been approved by the NRC Office of Nuclear Reactor Regulation are what we consider to be the basis for NRC inspection activities; we explained in Appendix C to the Topical QA Report that specific details of the Regulatory Guides and industry standards are not a part of the QA Program unless specificaaly addressed in the applicable SAR, technical specifications, etc.

Therefore, when we applied our Topical Quality Assurance Report to Turkey Point Unit Nos. 3 and 4 by our letter to Mr. Lear of September 10, 1976 (L-76-331), our commitment to Regulatory Guides and industry standards was (and still is) as described in our QA Program documents.

We would expect that if during an NRC inspection, an unresolved question arose as to whether or not a requirement of a Regulatory Guide or industry standard requirement is included in our QA Program, that it would be referred to the NRC Office of Nuclear Reactor Regulation for resolution rather than being handled by enforcement action. Obviously resolution issues pertaining to implementation of our QA Program documents would be within the scope of NRC Office of Inspection and Enforcement.

If these Regulatory Guides and industry standards were used directly as the basis for NRC inspections, it would pose not only a regulatory dilemma, but perhaps more importantly, it would be very confusing to the personnel who perform quality related activities. These people carry out their quality related activities in accordance with our Quality Assurance Manual and not directly to the details of the Regulatory Guides and industry standards.

Should you have any question in this matter, please feel free to contact me.

Very truly yours,

Robert E. Uhrig

Robert E. Uhrig
Vice President

REU:GDW:cf

cc: J. P. O'Reilly, Region II
Robert Lowenstein, Esquire

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Q001 S 1/1 P ADD: ALTER

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