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 FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light C 05000250  
 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251  
 AUTH. NAME AUTHOR AFFILIATION  
 WOODY, C. O. Florida Power & Light Co.  
 RECIP. NAME RECIPIENT AFFILIATION  
 REYES, L. Region 2, Office of Director

SUBJECT: Forwards response to 860721 request for addl info re Rev 9  
 to Topical QA Rept FPL TQAR 1-76a.

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SEPTEMBER 9 1986  
L-86-363

Luis Reyes, Acting Director  
Division of Reactor Projects, Region II  
U.S. Nuclear Regulatory Commission  
Suite 3100  
101 Marietta Street, N.W.  
Atlanta, Georgia 30323

Dear Mr. Reyes:


Re: Turkey Point Plant Unit Nos. 3 and 4  
Docket Nos. 50-250 and 50-251  
St. Lucie Plant Unit Nos. 1 and 2  
Docket Nos. 50-335 and 50-389  
Topical Quality Assurance Report (FPL TQAR I-76a)  
Response to Request for Additional Information

Your letter dated July 21, 1986 transmitted NRC's Request for Additional Information (RAI) regarding Revision 9 to FPL TQAR I-76a.

The attached provides a complete response to your request.

Should you require any additional information, please contact us.

Very truly yours,

  
C. O. Woody  
Group Vice President  
Nuclear Energy

COW/GRM/cvb

Attachment

cc: Dr. J. Nelson Grace, NRC Region II  
Harold F. Reis, Esquire

8610270455 860909  
PDR ADDCK 05000250  
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PEOPLE...SERVING PEOPLE

Re: Docket Nos. 50-250, 50-251  
50-335 and 50-389  
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**RAI-I Section 1.2.3.2, Page 9 of 27 (of Revision 9)**

Within this section, the duties, responsibilities, and authorities of each manager in the Quality Assurance Department are delineated. In Revision 9, an exception was made for the Quality Assurance Systems and Audits Group. Instead of assigning responsibility to an individual, the revised version assigns responsibility collectively to the group as a whole.

Explain the reason for this change.

**FPL RESPONSE**

The title of Assistant Manager of Quality Assurance was removed from the responsibility for the Systems and Audits group and this responsibility was assigned in the Topical to the group as a whole. The position of Assistant Manager of Quality Assurance has been eliminated for this group, however, the individual supervising this group is the Supervising Engineer - QA Systems and Audits reporting to the Manager of QA Services. This is described in the paragraph above on the same page.

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RAI-2 Section 1.2.4, Page 17 of 27

Revision 8 states that the QA Department has a representative assigned to each major project, who reports to the Director of Quality Assurance. Revision 9 deletes this requirement.

Explain the basis for this deletion.

#### FPL RESPONSE

This section was deleted as a result of modifying section 1.2.3.2 on Page 13 of 27.

Each site has a Superintendant of QA who reports to the Director of Quality Assurance. The project QA Engineer reports to this Superintendent of QA.

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RAI-3 Section 2.2.2, Page 4 of 7

Revision 8 states that quality instructions shall be reviewed by the Quality Assurance Department. Revision 9 states that these instructions shall be reviewed at each revision.

Explain the reason for adding "at each revision" to this statement and how it impacts other parameters governing the frequency of procedure review.

#### FPL RESPONSE

It is the practice of the Quality Assurance Department to review not only the initial issuance of any department's Quality Instructions, but also any changes made to those Quality Instructions. The frequency of this review is dictated by the individual department's need to change their instructions for more efficiency, effectiveness or to meet additional requirements which may arise.

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RAI-4 Section 2.2.4, Page 5 of 17

Revision 9 deletes three responsibilities of the QA Department dealing with the coordination of the QA program, the Topical Report, and the review of quality instructions written by other groups.

Explain the basis for the deletion.

#### FPL RESPONSE

The statement of responsibility for the Quality Assurance Department was deleted because it was redundant with information already provided in section 1.2.3.2. This deletion prevents the future possibility of conflicting information.

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**RAI-5 Section 2.2.5, Page 6 of 17**

Revision 9 removes the commitment for the QA Department to be responsible for the indoctrination of supervisory personnel. It also deletes requirements for department heads to indoctrinate non-supervisory personnel.

Explain the basis for this deletion.

**FPL RESPONSE**

This section still requires that Quality Procedures delineate the requirements for an indoctrination program to assure that personnel responsible for performing quality activities are instructed in the purpose, scope, and implementation of the quality related manuals, instructions, and procedures and that compliance to these documents is a mandatory requirement. The Quality Assurance Department has established and developed the program for quality assurance indoctrination of these personnel. The Quality Procedures specify who is qualified to give this indoctrination. Although these individuals are currently limited to our certified Lead Auditors and the personnel administering training for plant access, individuals qualified from other departments may be added in the future for efficiency and effectiveness. Maintaining this detail of the indoctrination process in the Quality Procedure allows this management flexibility.



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RAI-6 Section 6.2.1, Page 1 of 3

Revision 8 states that quality procedures shall delineate the control measures for controlled documents including direction for the verification that changes are properly incorporated. Revision 9 changes the wording to read "verification that changes are received".

Explain the reason for this wording change.

#### FPL RESPONSE

The purpose of this section of Document Control is to specify examples of control measures that are to be included in the Quality Procedures. The example was changed from verifying that changes are incorporated to verifying that they are received because receipt is the result of a receipt acknowledgement system. The result of our audit system verifies the incorporation of changes.



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RAI-7 Section 7.2.3, Page 3 of 3

Revision 8 lists six elements which shall be included in receiving inspections. Revision 9 deletes one of these elements, dealing with identifying, segregating, and handling nonconforming items.

Explain the basis for this deletion.

#### FPL RESPONSE

The element dealing with nonconfirming items was deleted after modifying the elements of receiving inspection that concern any outcome of both inspection instructions and the identification of the inspection status. Details of nonconformance control are specified in section 15.0 of the Topical Report; these details address the identifying, segregating and handling of nonconforming items.

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RAI-8 Section 13.2.1 and 13.2.2, Page 1 of 2

The last paragraph of Section 13.2.1 and the entirety of Section 13.2.2, concerning the establishment of handling, storage, and shipping requirements, was deleted by Revision 9.

Explain the basis for this deletion.

#### FPL RESPONSE

These paragraphs were moved to section 4.2.1 to avoid any future possibility of conflicting requirements regarding procurement documents.

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RAI-9 Section 7.2.1, Page 1 of 2

Revision 8 contains a list of six elements which, as a minimum, inspection and test records shall identify. This list is deleted by Revision 9.

Explain the basis for this deletion.

#### FPL RESPONSE

This listing was added to both sections 10.2.4 and 11.2.2 to avoid any future possibility of conflicting requirements for inspection and test records.

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RAI-10 Section 18.2.2, Page 3 of 5

In revision 8 of this section, letter "c", the scope of audit activities includes the request for proposals and evaluation of bids. Revision 9 revised this commitment to require audits only of the evaluation of bids.

Explain the basis for this change.

#### FPL RESPONSE

The reason for the deletion is because this requesting document does not represent a binding offer to either the buyer or seller. For this reason, the request for bid proposals are not considered to be record documents within the Purchasing Department files and are not audited.

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RAI-II Section 18.2.5, Page 5 of 15

Revision 8 states that when implementation of corrective action cannot be verified by other means, a reaudit of deficient areas shall be performed to accomplish verification. Revision 9 deletes this requirement.

Explain the basis for this deletion.

#### FPL RESPONSE

The last sentence of this section was deleted and verification requirement was added to the previous sentence.