CONTROLLED DOCUMENT

CAROLINA POWER & LIGHT COMPANY

CORPORATE QA DEPARTMENT

OPERATIONS QA/QC SECTION

PROCEDURES

SURVEILLANCE PROGRAM

OQA-201

REVISION 1

"UNCONTROLLED COPY"

REVIEWED & RECOMMENDED BY:

L E Loder — DIRECTOR QA/QC - BSEP — 9/21/87 DATE

G F Maryland — DIRECTOR QA/QC - SHNPP — 9/1/87 DATE

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APPROVAL:

C H Moseley, Jr — MANAGER - OPERATIONS QA/QC SECTION — 9/24/87 DATE

1.0 PURPOSE

The purpose of this procedure is to establish the requirements and guidance for conducting a surveillance program at CP&L's operating nuclear plants. The surveillance program will verify by examination, evaluation, and direct observation that an adequate quality assurance program has been developed and implemented.

2.0 REFERENCES

1. FSAR Section 1.8 and 17.2
2. Corporate Quality Assurance Program Manual

3.0 DEFINITIONS

3.1 Concern - Practice or condition which has the potential of causing a nonconformance or where additional information is required for evaluation of acceptability.

4.0 RESPONSIBILITIES

4.1 Manager - Operations QA/QC

The Manager - Operations QA/QC is responsible for establishing a surveillance program.

4.2 Director QA/QC

The Directors QA/QC are responsible for implementing this surveillance program at their respective sites.

4.3 QA Supervisor/Project QA Specialist

The QA Supervisor/Project QA Specialist shall be responsible for a schedule of surveillances.

4.4 QA/QC Specialist/Technician/Engineers

The QA/QC Specialist/Technicians/Engineers shall perform and document surveillances in accordance with this procedure.

5.0 PREREQUISITES

5.1 Personnel performing surveillances shall be trained and qualified in accordance with Personnel Indoctrination, Training, Qualification and Certification Procedure OQA-103.

5.2 Personnel conducting surveillances shall not have any direct responsibility in the area to be surveyed and shall not review work for which they had previous direct involvement.

6.0 PRECAUTIONS

6.1 Health Physics practices shall be adhered to when entering a Radiation Control Area to maintain exposure As Low As Reasonably Achievable (ALARA).

7.0 PROCEDURE

7.1 General

7.1.1 The objective of the plant surveillance program is to determine the adequacy of approved programs, the degree of implementation and effec-

tiveness of these programs. Areas under surveillance shall be evaluated against applicable documents such as the Operating License and Technical Specifications, ANSI Standards, ASME Code, FSAR, Corporate QA Program, the Plant Operating Manual, and other standards, procedures and instructions as applicable.

7.1.2 This program is designed with flexibility such that areas and frequency of surveillance may be governed by such factors as importance to nuclear safety, time since last inspection, current potential problem areas, and other factors as appropriate.

7.1.3 A variety of methods shall be employed in conducting surveillances such as examination of documents (procedure, data, logs, etc.), interviews with supervisory personnel and personnel performing the work, and direct observations of work in progress.

7.1.4 This program may take credit for satisfactory results of inspection, audits and surveillances performed by other qualified organizations. These may include the following, but are not limited to: INPO, Insurance Carriers, Codes & Standards inspectors, regulatory inspectors, and Performance Evaluation Unit.

7.2 Schedule and Scope

7.2.1 A schedule of surveillance activities shall be prepared by the responsible QA Supervisor/Project QA Specialist.

7.2.2 Scheduled surveillances shall be performed to include such areas as:

Construction
Operations
Maintenance
E&RC
Administration
Training
Regulatory Compliance
Engineering
Security
ONS
OQA/QC

7.2.3 The following surveillances shall be performed in accordance with specific site commitments or requirements:

Operating License Amendments and Orders
Technical Specification Surveillance Requirements
Regulatory Commitment Program
Regulation Requirements
Inservice Inspection Program

These surveillances are described in more detail in Paragraphs 7.4 thru 7.8.

7.2.4 Special surveillances may be performed when requested by site personnel or deemed necessary by QA/QC.

7.3 Preparation

7.3.1 Individuals preparing for a surveillance shall do the following as a minimum:

a. Review pertinent procedures, standards, codes, and regulatory requirements to familiarize themselves with the conditions in the area/operations to be surveyed.

b. A checklist shall be prepared unless conditions do not permit for special cases, as determined by the QA Supervisor/Project Specialist.

7.3.2 Each surveillance shall be uniquely numbered.

7.4 Operating License Amendments and Orders

7.4.1 The objective of the surveillance shall be to determine if the Operating Plant program for implementing Technical Specification revisions was performed.

7.4.2 When received, Amendments and Orders to the Operating License shall be reviewed to determine what actions are required to be implemented as a result of the revision. Surveillances shall be performed as committed to at each plant.

7.5 Technical Specification Surveillance Requirements

7.5.1 Each technical specification surveillance requirement shall be verified at least once per three years to assure that the required testing has been performed at the frequency specified.

7.5.2 A review of any cross reference document should be performed each time a surveillance is performed to assure it is being maintained current.

7.6 Regulatory Commitment Surveillance Program

7.6.1 QA surveillance shall be conducted to assure that commitments made to the NRC as a result of LER's, IE Bulletins, IE Inspection Reports and other regulatory commitments are resolved as committed. Surveillances shall be performed as committed to at each plant.

7.7 Regulation Surveillance

7.7.1 QA surveillance shall be performed to assure that CP&L is operating in accordance with the applicable NRC's rules and regulations as set forth in Title 10CFR, Parts 19, 20, 30, 50, 55, 70, 71, 73 and 100; and

Title 49, Parts 171-178 which pertain to radioactive hazardous waste. Surveillances shall be performed as committed to at each plant.

7.8 Inservice Inspection Program Surveillance

7.8.1 QA surveillance shall be performed to verify that the Inservice Inspection Program per the Technical Specification is in conformance with the committal to ASME Section XI program and is properly implemented. Appendix J to 10CFR50 will be included as part of the inservice inspection program.

7.8.2 The surveillance of the Inservice Inspection Program shall be performed on a frequency as committed to for each site.

7.9 Performing the Surveillance

7.9.1 Surveillance personnel should contact the responsible individual for the area being surveyed prior to performing the surveillance and discuss the scope of activities to be performed in his areas.

7.9.2 Surveillances shall normally be conducted as pre-planned. However, surveillance personnel may deviate from the checklist to determine if a quality problem exists.

7.9.3 Objective evidence shall be examined to determine compliance with program requirements. Nonconformances and concerns shall be discussed with and verbally acknowledged by the responsible individual for the area being surveyed.

7.9.4 Surveillance personnel may make recommendations, as appropriate, to responsible individuals in an effort to assist in rectifying these items.

7.10 Reporting

7.10.1 A surveillance report shall be prepared upon completion of the surveillance on a form similar to Enclosure 1, with distribution as determined by the Director QA/QC.

7.10.2 Reports concerning the Nuclear Plant Security Program shall be worded in such a way as not to release any safeguard material.

7.10.3 Nonconformances shall be issued in accordance with Nonconformance Control Procedure OQA-104.

7.10.4 When an item of concern is identified, it is documented on a form similar to the Item of Concern (IOC), Enclosure 2.

a. Section I of the IOC shall be completed by the individual identifying the item of concern, including the concern described in detail.

b. The individual identifying the item of concern or the responsible Supervisor/Specialist/Technician shall sign the form.

c. The responsible party will be requested to evaluate the concern and take appropriate action within thirty (30) calendar days from the date of the IOC. Response shall be given in Section II with an estimated completion date if necessary.

d. Section III shall be completed by the appropriate QA/QC personnel, following review of Section II.

7.10.5 Items of Concern shall be tracked and resolved or escalated for resolution as provided for by the Director QA/QC.

7.10.6 The surveillance report, IOC, and completed checklist shall be filed and maintained as QA records.

8.0 ENCLOSURES

1. Surveillance Report
2. Item of Concern

File No. _____ CAROLINA POWER & LIGHT COMPANY Page _____ of _____

QASR No. _____ OPERATIONS QA/QC Date _____

SURVEILLANCE REPORT

PLANT:

SURVEILLANCE AREA:

APPLICABLE DOCUMENTS:

PERSONNEL CONTACTED:

SUMMARY:

PERFORMED BY: _____ DATE: _____

REVIEWED BY: _____ DATE: _____

TO: _____
Responsible Supervisor/Engineer

IOC No. _____

Date _____

CAROLINA POWER & LIGHT COMPANY
CORPORATE QA DEPARTMENT
QA/QC ROBINSON PLANT

ITEM OF CONCERN

I.

SURVEILLANCE AREA: _____

PERSON IDENTIFYING ITEM OF CONCERN: _____

REVIEWED BY: _____ _____
QA Supervisor/Project QA Specialist - Surveillance Date

RESPONSE DUE BY: _____
Date

IOC NO. _____

-II.

RESPONSE: _____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____. Estimated Completion _____
Date

RESPONSIBLE SUPERVISOR/ENGINEER _____ _____
Date

III. CLOSEOUT

REINSPECTION/VERIFICATION PERFORMED:

_____

_____

_____

_____

_____

_____

COMPLETED BY: _____ _____
QA/QC Representative Date

REVIEWED BY: _____ _____
QA Supervisor/Project QA Specialist - Surveillance Date