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 AUTH. NAME AUTHOR AFFILIATION
 ZIMMERMAN, S. R Carolina Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 GRACE, J. N. Region 2, Office of Director

SUBJECT: Advises of changes to FSAR, reflecting revs to QA program.
 Future amend will update FSAR to clarify QA supervisors
 review responsibilities & expand description of training of
 QA/QC personnel in diesel maint. Marked-up FSAR pages encl.

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Carolina Power & Light Company

SERIAL: NLS-85-366

OCT 1 6 1985

Dr. J. Nelson Grace, Regional Administrator
United States Nuclear Regulatory Commission
Suite 2900
101 Marietta Street, NW
Atlanta, GA 30303

SHEARON HARRIS NUCLEAR POWER PLANT
UNIT NO. 1 - DOCKET NO. 50-400
QA PROGRAM - FSAR UPDATE

Dear Dr. Grace:

Carolina Power & Light Company hereby advises you of changes to the Shearon Harris Nuclear Power Plant's (SHNPP) Final Safety Analysis Report (FSAR) reflecting revisions to the SHNPP's Quality Assurance (QA) Program.

The FSAR will be updated in a future amendment to:

- clarify the review responsibilities of QA supervisors (Chapter 17)
- revise the description of QA's role in procedures review/concurrence cycle, which has been strengthened by concentrating QA resources on the review/concurrence of procedures which establish QA/QC holdpoints or require action by the QA organization (Chapter 17)
- expand the description of training for QA/QC personnel involved in diesel maintenance to describe alternate means of training replacement personnel (Chapter 8).

Marked-up FSAR pages reflecting these changes are attached.

These changes do not reduce the QA program at SHNPP; they either clarify existing information or strengthen an existing aspect of the program. These changes were effective on July 25, 1985; therefore, this letter fulfills the requirements of 10CFR50.55(f)(3) which states that changes to a previously accepted QA program description included in the Safety Analysis Report that do not reduce commitments must be submitted to the NRC within 90 days.

DESIGNATED ORIGINAL

Certified By P. B.

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PDR ADOCK 05000400
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411 Fayetteville Street • P. O. Box 1551 • Raleigh, N. C. 27602

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If you have any questions, please contact Ms. Carol Love of our Nuclear Licensing Section staff at (919) 836-8166.

Yours very truly,



S. R. Zimmerman
Manager
Nuclear Licensing Section

SRZ/GCL/mf (2015CGL)

Attachment

cc: Mr. B. C. Buckley (NRC)
Mr. G. F. Maxwell (NRC-SHNPP)
Dr. J. Nelson Grace (NRC-RII)
Mr. Travis Payne (KUDZU)
Mr. Daniel F. Read (CHANGE/ELP)
Wake County Public Library

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Dr. Richard D. Wilson
Mr. G. O. Bright (ASLB)
Dr. J. H. Carpenter (ASLB)
Mr. J. L. Kelley (ASLB)
Mr. H. A. Cole

program. He has access to corporate management up to and including the Chairman/President to resolve any quality assurance related concerns if the concerns cannot be resolved satisfactorily at a lower management level. He has delegated the authority necessary for implementation of the Corporate Quality Assurance Program to the Manager - Operations Quality Assurance/Quality Control, Manager - Quality Assurance/Quality Control Harris Plant and to the Manager - QA Services Section.

The Manager - Operations Quality Assurance/Quality Control has direct management responsibility for the QA/QC activities related to the start-up and operations of SHNPP. He has delegated the authority necessary for implementation of the Corporate Quality Assurance Program to the Director Harris Operations QA/QC.

The Manager - Quality Assurance/Quality Control Harris Plant has direct management responsibility for the QA/QC activities related to the Engineering & Construction of the SHNPP. He has delegated the authority necessary for implementation of the Corporate Quality Assurance Program to the Director QA/QC Harris Plant, the Principal QA Engineer - On-site Quality Assurance Engineering Unit, and the Principal QA/QC Specialist - NDE Unit.

The Director - Harris Operations QA/QC is responsible for conducting the onsite QA/QC activities during start-up and operation of the Shearon Harris Nuclear Power Plant in accordance with the Corporate QA Program and QA/QC procedures. The Corporate QA Program provides assurance that the Director - Harris Operations QA/QC has appropriate organizational responsibilities and authority to exercise proper control over the onsite Operations QA Program. The Director - Harris Operations QA/QC has delegated the authority necessary for implementation of his portion of the Corporate QA Program to the Operations QA Supervisor, Operations QC Supervisor, and the Operations Principal QA Engineer. The Director - Harris Operations QA/QC receives support from the Manager - QA/QC Harris Plant on an as-needed basis.

The Operations QA Supervisor and his staff, are responsible for:

- a) Providing QA services during start-up and operation of the plant.
- b) Stopping maintenance and modification work which does not meet requirements.
- c) Reviewing selected plant procedures and instructions to assure that quality requirements are adequately prescribed.
- d) Assuring timely resolution of concerns and identified nonconformances.
- e) Ensuring holdpoints have been inserted in work control documents.
- f) Coordinating/conducting surveillance of ongoing plant activities.
- g) Providing procedures and instructions necessary for accomplishment of QA activities.
- h) Ensuring maintenance of records attesting to accomplishment of QA activities.

4) Reviewing plant modification documents to assure that quality requirements are 17.2.1-4 adequately prescribed.

modification package review

The Operations QA Supervisor and his staff receive, on an as-needed basis support from Operations QA Engineering in areas such as procedure review and interpretations of codes and standards.

The Operations QC Supervisor and his staff are responsible for:

- a) Conducting inspections of maintenance and modification activities.
- b) Stopping maintenance and modification work which does not meet requirements.
- c) Reviewing ~~plant modification~~ and maintenance documents to assure that quality requirements are adequately prescribed.
- d) Reviewing procurement documents and performing receipt inspections.
- e) Ensuring hold points have been inserted in work control documents.
- f) Providing procedures and instructions necessary for accomplishment of QC activities.
- g) Ensuring maintenance of records attesting to accomplishment of QC activities.
- h) Conducting designated inspections of ongoing maintenance and initial hydrostatic testing activities.

The Operations QC Supervisor and his staff receive on an as-needed basis support from Operations QA Engineering in areas such as procurement document review and ~~modification package review~~ and interpretations of codes and standards.

The Operations Principal QA Engineer and his staff are responsible for:

- a) Developing and maintaining the Harris QA program to meet regulatory commitments.
- b) Assisting the Harris project organizations in the development and implementation of procedures, review of specifications, and modification packages to meet commitments.
- c) Providing QA engineering support to the Harris project organizations on QA problem resolution.

The Operations Principal QA Engineer and his staff receive, on an as-needed basis, support from the off-site and on-site QA Engineering units in areas such as procedure review and interpretations of codes and standards.

SUNPP FSAR

QA/QC personnel routinely participate in plant meetings and review schedules in order to keep abreast of plant activities. Such action ensures that sufficient qualified QA/QC manpower and procedures are made available to provide the necessary QA/QC coverage for the scheduled activities.

The appropriate requirements of the docketed QA program description and the regulatory guides are listed in Section 1.8 of the FSAR and are translated into procedures and instructions. These procedures and instructions are reviewed by qualified personnel for adequacy and are subject to surveillance and audit by QA to ensure proper implementation.

The General Manager - Harris Plant Operations Section is responsible for ensuring that FSAR commitments such as technical specifications, regulatory guides, and codes and standards are correctly translated into procedures and instructions and that procedures and instructions are properly implemented. Responsible plant and QA/QC personnel are required to be knowledgeable of the FSAR commitments with particular emphasis given to technical specifications, regulatory guides, and codes and standards. The General Manager - Harris Plant Operations Section will develop a procedure that details accountability and defines the system for assuring that FSAR commitments and changes/additions to those commitments are correctly translated into implementation procedures and instructions. Proper implementation of this procedure and FSAR commitments will be subject to surveillance and audit by QA. As an additional check, QA will develop a matrix of technical specification commitments versus implementing procedures to provide a level of assurance that technical specification commitments are addressed in implementing procedures. Procedural compliance will be verified through QA surveillances and audits.

~~Table 17.2.1-1 provides a listing of plant procedures and identifies those that require QA review and concurrence. This listing is considered exemplary and as such will not be updated in the future. Quality Assurance is in the review and concurrence cycle for procedures that address QA requirements; typical examples being (i) administrative procedures involving QA program requirements, (ii) maintenance and modification procedures, (iii) preoperational test procedures, and (iv) surveillance test procedures.~~

*which establish QA/QC holdpoints or
which require action by the QA
ORGANIZATION.*

TABLE 17.2.1-1

INDEXSHNPP PLANT OPERATING MANUAL INDEX

N - No Review Required
 O - Original Revision Only
 R - Original and Subsequent
 Revisions

VOL.	Procedure No.	Rev.	Title	Responsibility	QA Review	ALARA Review	Approval Authority
1			<u>Administrative Instructions</u>	Admin. Supv.			
	AI-1	*	Rules of Conduct	Admin. Supv.	R		Gen. Mgr.
	AI-2	*	Plant Organization	Admin. Supv.	R		Gen. Mgr.
	AI-3	*	External Interface Instructions	Admin. Supv.	R		Gen. Mgr.
	AI-4.0	I	Document Control-Conduct of Operations	Sr. Spec. Doc. Cont.	R		Gen. Mgr.
	AI-4.1	*	Filing Index and Instructions	Sr. Spec. Doc. Cont.	R		Gen. Mgr.
	AI-4.2	*	Control of Plant Forms	Sr. Spec. Doc. Cont.	O		Gen. Mgr.
	AI-4.3	*	Document Distribution & Control	Sr. Spec. Doc. Cont.	R		Gen. Mgr.
	AI-4.4	*	Micrographics Instructions	Sr. Spec. Doc. Cont.	O		Gen. Mgr.

* Procedure to be written

** To be determined later

17.2.19

FIRE PROTECTION QA PROGRAM

The General Manager - Harris Plant Operations Section is responsible, unless otherwise designated in this section, for the overall administration of the fire protection program and provides the on-site point of control and contact for all contingencies. These responsibilities include final approval of all fire protection procedures and assignment of personnel to be members of the Fire Brigade Teams. ~~Fire protection procedures will be reviewed and concurred by QA/QC.~~

The General Manager - Harris Plant Operations Section will direct a documented program of quality assurance for items designated by the Fire Protection Specialist as Fire Protection items. The program will accomplish the following:

- a) Quality Control inspection of the installation, corrective maintenance, modifications, and receipt of designated fire protection items.
- b) Verification of compliance with governing procedures of the Fire Protection Program.
- c) Provision for adequate quality assurance controls for designated fire protection items to ensure the maintenance of an effective fire protection program.

The Fire Protection Specialist is responsible for:

- a) Coordination of all fire protection program activities.
- b) Preparation of procedures and instructions which implement the Fire Protection Program.
- c) Ensuring the development and technical adequacy of the training materials and training sources related to the fire protection program, and assigning qualified Fire Protection instructors.
- d) Preparation of the listing of those Fire Protection items which are subject to the quality assurance procedures.
- e) Periodic monitoring of all fire protection activities.
- f) Assisting the Plant Supervisor in assuring that all corrective maintenance and modifications of the fire protection systems comply with Technical Specifications.
- g) Coordination of the arrangements for off-site fire company support and training.
- h) Scheduling and implementation of the Fire Drills Program.
- i) Establishing the minimum equipment for the Fire Brigade Teams.

SHNPP FSAR

Diesel generator training will be given to licensed operators and to operations' supervisory personnel in the License Training Program. The diesel will be specifically discussed in the Systems training lectures. These lessons will include theory of operations, subsystems descriptions, system interaction, as well as normal and emergency operations. After the training lectures, each license candidate will also participate in a walk-through exam and Pre-License Simulator Training. This simulator training will include recognition of diesel generator failure and instruction on the proper operation of the equipment. After diesel generator instruction is completed, qualified individuals will perform all line-ups on the diesel generator and its subsystems. This independent verification will be documented in diesel procedures.

Diesel generator training for replacement personnel will be comparable to the initial training program. Licensed operators and operations' supervisory personnel will be required to complete Hot License Training, which will include instruction on diesel generators. Requalification training for licensed operators and operations' supervisory personnel will involve classroom lecture and simulator training on the diesel generator.

Maintenance of the diesel generator will be jointly assigned to a Maintenance Supervisor-Mechanical, a Maintenance Supervisor-Electrical, and their respective crews. Diesel upkeep will be accomplished as described in SHNPP's commitment to Regulatory Guide 1.33, FSAR Section 1.8.

To ensure qualified individuals, an on-site diesel generator program for maintenance personnel was taught by the SHNPP diesel generator supplier, TransAmerican Delaval, which included two training courses: one course for maintenance instrument and control technicians and one course for maintenance mechanics. The supervisors of the respective groups also attended the training program.

The appropriate instrument and control employees have attended a course instructing them of the function, operation, and maintenance of the SHNPP diesel generators. The course includes topics on logic, pneumatic logic elements, logic boards, electric elements, control systems, adjustment, calibration and troubleshooting. The appropriate mechanical maintenance employees have attended a course with lectures on diesel engine construction, governor operation, the auxiliary skid, control systems, preventive maintenance, overhaul procedures, and troubleshooting. For replacement maintenance personnel, diesel training is conducted as necessary, with the program equivalent to the vendor training.

QA/QC personnel, who are involved in diesel maintenance, will participate in both the Delaval training courses described in above paragraphs. Replacement personnel will ~~participate in the replacement maintenance personnel program described above.~~ *meet at least one of the following:*

1. *Participation in the replacement maintenance personnel program described above.*
2. *Individual's training and experience with diesel genera is evaluated by the Director - Harris Operations QA/QC to be equivalent to participating in the ABOVE DELAVAL TRAINING COURSES.*
3. *PARTICIPATION IN A DIESEL TRAINING COURSE FOR QA/QC personnel conducted as necessary with a program equivalent to the vendor training.*

