VIRGINIA ELECTRIC

AND

POWER COMPANY

TOPICAL REPORT

QUALITY ASSURANCE PROGRAM

OPERATIONS PHASE

VEP-1-5A

(UPDATED)

Amendment Five
June, 1986
(Updated 4/88)

The Company's Position	Conformance Status	Justification

6) With the exception of the time intervals defined by the station Technical Specifications, the following definitions shall be applied when defining time intervals for other activities:

Weekly: at least once per 7 days

Monthly: at least once per 31 days

Quarterly or every 3 months: at least once per 92 days

Semiannually or every 6 months: at least once per 184 days

Every 9 months: at least once per 276 days

Yearly or annually: at least once per 366 days

Biennial (2 years): at least once per 732 days

Triennial (3 years): at least once per 1098 days

The above time intervals may be extended by up to 25% provided the combined time interval for three consecutive activities does not exceed 3.25 times the specified time interval.

The Company's Position	Conformance Status	Justification

The following clarification is substituted for the current subsection 5.4.3 "Provisions shall be made for special processed records (such as radiographs, photographs, negatives, microfilm and magnetic media) to prevent damage as appropriate to the record type and will address the manufacturer's recommendations."

4) With regard to Section 5.5 of ANSI N45.2.9 - 1974 titled Safekeeping: Routine general office and nuclear site security systems and access controls are provided.

5) With regard to Section 5.6 of ANSI N45.2.9 - 1974 titled Facility: Records shall be forwarded to the appropriate records storage facility promptly after completion when required processing and reviews have been completed.

Paragraph 4, subsection 3 is clarified to require a two-hour minimum fire rating to be consistent with the 1979 version of the Standard and NRC Criteria for Record Storage Facilities (Guidance - ANSI N45.2.9, Section 5.6) issued 7/15/79.

Paragraph 4, subsection 9 is clarified to read: "No pipes or penetrations except those providing fire protection, lighting, temperature/humidity control, or communications are to be located within the facility and they shall comply with a minimum two-hour fire protection rating.

The Company's Position	Conformance Status	Justification

signaling system is provided, with a remote alarm located at a constantly attended station.

d) Telephone service is provided to the file room, with the wire penetration constructed and sealed in accordance with NFPA No. 232-1975.

e) All records stored in the file room are stored in metal cabinets, which are arranged to provide adequate access and aisleways. Work not directly related to the storage, retrieval or auditing of records is not allowed in the file room. Smoking, eating, and drinking is prohibited in the file room.

f) A wall divides the file room into two sections, with one section used as a file room and the other section used for other purposes. The dividing wall has a minimum fire rating of two (2) hours, including the fire door dampers in the duct penetrating the wall.

The Innsbrook Technical Center's vital records vault for nuclear records conforms to the requirements of Section 5.6 of ANSI N45.2.9-1974 without exceptions.

17.2.1 ORGANIZATION

17.2.1.1 General Description

A. Executive Vice President

Procurement is comprised of five groups; Contracts, Fuel Procurement, Procurement Services, Purchasing and Transportation. Collectively the procurement groups are responsible for the acquisition of all fuels, materials, supplies, services, and transportation.

B. Senior Vice President - Power

Power is divided into four distinct groups; Fossil and Hydro, Nuclear, Power Engineering Services, and Power Management Services. Collectively, except for Fossil and Hydro, these groups are responsible for licensing, operation and support of the nuclear power stations.

C. Senior Vice President - Corporate Technical Services

Corporate Technical Services consists of System Planning and Power Supply, Telecommunications, Corporate Technical Assessment, Real Estate and Facilities, Water Quality, Air Quality, Administrative Services, and Quality Assurance. Quality Assurance has the responsibility to monitor compliance with the Operational Quality Assurance Program.

17.2.1.2 Management of Operational Quality Assurance. The specific responsibilities for operational quality assurance are outlined below.

A. NUCLEAR OPERATIONS - The Vice President-Nuclear is responsible to the Senior Vice President-Power and has corporate responsibility for the operation of nuclear power stations. As such, he has overall responsibility for the implementation of the requirements established by the Quality Assurance Program for the operational phase of nuclear power stations.

1. Station Manager

Responsible to the Vice President-Nuclear for the overall safety and efficient operation of the station, and for the implementation of quality assurance requirements in the areas specified by the Operational Quality Assurance Program.

a. Assistant Station Manager (Operations and Maintenance)

Responsible to the Station Manager for directing operation, maintenance and technical services; and for support and enforcement of the company's policies and procedures. In the Station Manager's absence, he assumes the authority and responsibilities of the Manager, including implementation of the Quality Assurance Program.

b. Assistant Station Manager (Nuclear Safety and Licensing)

Responsible to the Station Manager for ensuring compliance with station technical specifications, coordination of licensing activities within the station, interfacing with the Director-Safety Evaluation and Control on safety and licensing issues; and supervisor of emergency plan activities.

c. Superintendent-Operations/Superintendent-Maintenance/ Superintendent-Technical Services/Superintendent-Health Physics

Responsible to the Station Manager, either directly or through the Assistant Station Manager (O&M) for the safe and efficient operation and maintenance of the station within their respective areas of responsibility, including quality assurance requirements specified in the Operational Quality Assurance Program.

d. Station Supervisory Personnel

Responsible directly to the Station Manager through their respective superintendents, for implementing the Operational Quality Assurance Program requirements applicable to their respective areas of responsibility.

e. Station Staff

It is the responsibility of each member of the station staff to adhere to the provisions contained in the Operational Quality Assurance Program when performing their work tasks to assure quality workmanship. All station personnel shall receive training (General Employee Training) in the use of and adherence to the Operational Quality Assurance Program.

f. Station Nuclear Safety and Operating Committee

Serves in an advisory capacity to the Station Manager. The technical specifications of each station define the responsibilities of this committee. The Station Nuclear Safety and Operating Committee is separate from operational Quality Assurance activities in that its authority and responsibilities are not established by the Operational Quality Assurance Program. However, since the prime responsibility of this committee is to provide a continuing review of the operational and safety aspects of the station, it does perform a quality assurance function.

2. Manager-Nuclear Operations Support

Responsible to the Vice President-Nuclear to manage the system level support involving maintenance, health physics, chemistry and outage management services for the operating nuclear power stations.

a. Director-Health Physics/Chemistry

Responsible to the Manager-Nuclear Operations Support for providing health physics and chemistry support services for nuclear stations.

b. Director-Operations and Maintenance Support

Responsible to the Manager-Nuclear Operations Support for providing maintenance, outage support, coordination of major equipment repair or replacement, for reviewing station efficiency, and for making recommendations for improvement.

3. Manager-Nuclear Programs

Responsible to the Vice President-Nuclear to manage the system level support involving international agreements, interface with industry, coordination with the Institute for Nuclear Power Operations, and other programs which may be assigned.

4. Manager-Nuclear Licensing

Responsible to the Vice President-Nuclear to manage the system level support involving licensing, safety review and overall management in the area of emergency planning and preparedness.

a. Director-Safety Evaluation and Control

Responsible to the Manager - Nuclear Licensing for independent review of the nuclear power stations and providing support for the stations in the areas of safety review, NRC issues and actions; technical and strategic support for licensing and regulatory agency submittals, hearings and conferences.

(1) Safety Evaluation and Control

The Safety Evaluation and Control staff, under the Director-Safety Evaluation and Control, provides an independent review of matters relating to the activities of the Station Nuclear Safety and Operating Committee, the Operating License and Technical Specifications, changes and modifications, Technical Specification departures, investigations, tests, abnormal performance, and incidents reportable as required by 10 CFR 20 and 50; and makes recommendations on these matters. The Technical Specifications for each station further define these responsibilities.

b. Supervisor-Corporate Emergency Planning

Responsible to the Manager-Nuclear Licensing for managing the overall scheduling and coordination of emergency testing and training exercises with Federal, State and local agencies. Works with nuclear station managers to ensure emergency plans meet all the requirements and commitments.

5. Manager-Nuclear Site Services

Responsible to the Vice President-Nuclear to manage assigned support activities and the additions or modifications to existing power stations including the coordination of engineering interfaces, coordination of interfaces with station or system personnel, preparation of project estimates, planning, cost control and forecasts in personnel, the safe and productive performance on a construction project - specific basis, and management and coordination of projects.

a. Superintendent-Site Services (One at each Nuclear Station)

Responsible to Manager-Nuclear Site Services for managing all aspects of the assigned projects including interface with station management, construction and support activities such as accounting, procurement planning, scheduling cost control, and document control.

b. Superintendent - Radiological Waste Project

Responsible to the Manager - Nuclear Site Services for management of design and construction of the Radiological Waste Facilities at each power station.

6. Manager-Nuclear Training

Responsible to the Vice President-Nuclear for training of personnel who operate or support the nuclear power stations. Included in this process are determining the need for training based on information provided by the Nuclear Group, developing performance-based training programs, implementing training programs to support employee and station needs, and evaluating training programs.

7. Director-Administrative Services

Responsible to the Vice President-Nuclear for providing administrative and personnel support services to the system office. Advise and assist stations with administrative, personnel support, contracts, and expediting support.

B. POWER ENGINEERING SERVICES - Vice President-Power Engineering Services is responsible to the Senior Vice President-Power for civil, electrical, mechanical, and nuclear engineering, including establishment, implementation and maintenance of programs to control design input, final design, design output, internal and external design interface and design authority. Also responsible for in-service inspection and non-destructive examination programs and for nuclear core design, safety analysis, reactor performance evaluation, spent fuel disposition, and fuel inspection.

1. Manager-Nuclear Engineering

Responsible to the Vice President Power Engineering Services implementing the Operational Quality Assurance Program in the following areas:

- Engineering standards for nuclear design control.
- Engineering evaluation of generic industry issues.
- Engineering programs to maintain compliance with regulatory issues.
- Management of engineering resources for specific tasks.

a. Supervisor-Site Nuclear Engineering (One at each station)

Responsible to the Manager-Nuclear Engineering for the implementation of the Operational Quality Assurance Program in the following areas:

- Implementation of the design change program at the site including initiating field changes as required.
- Providing engineering disposition to Nonconformance Reports.
- Reviewing procurement documents.
- Managing the drawing update program.
- Managing engineering services as requested by station or construction management.

b. Engineering Staff

Responsible to the Manager-Nuclear Engineering to adhere to the provisions contained in the Operational Quality Assurance Program applicable to their respective areas of responsibility.

2. Manager-Nuclear Analysis and Fuel

Responsible to the Vice President-Power Engineering Services for the development and implementation of the Operational Quality Assurance Program in the following areas:

- Nuclear fuel management and core design
- Core and system thermal hydraulic analysis
- Fuel performance analysis
- Reload safety evaluation
- Engineering support for spent fuel disposition
- Radiation protection engineering
- Reactor performance evaluation
- Nuclear fuel accountability, inspection, and vendor surveillance

3. Manager ISI/NDE Services

Responsible to the Vice President-Power Engineering Services for the Inservice Inspection Program and the Nondestructive Examination Services Program in the following areas:

- Direction of the Inservice Inspection Program relative to sound judgement, company requirements, and regulatory and enforcement authority requirements.
- Management and assessment of the effectiveness of the Inservice Inspection Program through reviews, evaluations, and updates.
- Development of the inspection programs, plans, and schedules.
- Development, maintenance, and implementation of the Nondestructive Examination Services Program.
- Performance and the technical aspects of nondestructive examinations.
- Qualification and certification of Virginia Power NDE personnel.

4. Managers - (Civil, Electrical, Mechanical) Engineering

Responsible to the Vice President-Power Engineering Services. Provide engineering services through a project matrix organization to the Manager-Nuclear Engineering. Activities include development of procurement specifications, construction drawings, technical reviews, calculations, etc.

C. PROCUREMENT - The Vice President-Procurement is responsible to the Executive Vice President for the acquisition of all fuels, materials, supplies, services and transportation.

1. Manager-Contracts is the responsible to the Vice President - Procurement for performing contract administration functions in support of the Operational Quality Assurance Program for the nuclear power stations, except for fuel and fuel related services.

2. Manager-Fuel Procurement is responsible to the Vice President - Procurement for the purchasing of nuclear fuel and related services, and to adhere to the provisions contained in the Operational Quality Assurance Program applicable to his respective area of responsibility.

3. Manager-Purchasing is responsible to Vice President - Procurement to procure the equipment, materials, supplies and general and technical services in support of the Operational Quality Assurance Program at the nuclear stations.

D. QUALITY ASSURANCE - The Manager-Quality Assurance (Corporate) is responsible to the Senior Vice President - Corporate Technical Services for the establishment of, and monitoring compliance with the quality assurance program for engineering, construction and operation activities of the power group. The Manager - Quality Assurance may make recommendations to the Vice President - Nuclear, or other levels of management. If he disagrees with any action taken by the Nuclear group, and is unable to obtain resolution, he shall bring the matter to the attention of the Senior Vice President - Power who will determine the final disposition.

1. The Manager-Quality Assurance (One at each site) is responsible to the Manager - Quality Assurance (Corporate) for monitoring compliance with the Quality Assurance Program for the Operational Phase of the nuclear power stations and the technical support of the quality assurance effort associated with the modification, operation and maintenance of the nuclear stations. The Manager - Quality Assurance (Station) may make recommendations to the Station Manager or other levels of management. If he disagrees with any quality assurance actions taken by the Station Manager, he shall notify the Manager - Quality Assurance (Corporate) and the Vice President - Nuclear.

2. The Manager-Quality Assurance-Engineering and Vendor Surveillance is responsible to the Manager - Quality Assurance (Corporate) for monitoring compliance with the quality assurance program for surveillance and audit of vendors and contractors, preparation and maintenance of the Company Vendors List, auditing and inspection of quality assurance activities associated with nuclear fuel and those areas of the Operational Quality Assurance Program applicable to his respective area of responsibility.

a. The Supervisor-Quality (A minimum of four at each station) is responsible to the Manager - Quality Assurance (Station) to perform the following activities:

- Development, maintenance and implementation of suitable quality assurance auditing and inspection programs at the nuclear stations.

- Establishing a comprehensive system of planned and periodic audits to assure that technical requirements for operating nuclear stations including the design basis, applicable regulatory requirements, and specified codes and standards are correctly translated into specifications, drawings, procedures, or instructions.

- Inspection of operating and maintenance activities at the nuclear stations including testing, methods of operation and modifications to systems, components, or structures, where applicable.

- Development and maintenance of training for quality assurance personnel.

- Formulate, establish, review and approve Quality Assurance Department policies, procedures, and instructions.

- Monitor compliance with the Operational Quality Assurance Program.

b. The Station Quality Assurance Department conducts audits and inspections in accordance with the Operational Quality Assurance Program and performs other duties as directed by the individual Supervisors-Quality. The Quality Assurance Department representatives have access to all areas of the station at any time deemed necessary for inspections, audits, and observations related to quality. They have access to station records required for in-depth auditing of station operations, including confidential personnel records (but only to the extent necessary to verify personnel qualifications or other information related to quality.)

17.2.1.3 Authority to Stop Work

The Quality Assurance Organization has the authority, and the responsibility, to stop work in progress which is not being done in accordance with approved procedures or where safety or equipment integrity may be jeopardized. This extends to off site work performed by vendors furnishing safety related materials and services to the Company.

17.2.1.4 Imposition of "Stop Work"

A. Station Quality Control Staff - The Station Quality Assurance Department representative advises the cognizant supervisor or supervisory personnel to stop work in progress whenever he determines it is not being conducted in accordance with applicable procedures, instructions, guides, or standards or may jeopardize the safe operation of the station. The Supervisor-Quality immediately notifies the Station Manager of the decision to stop work because of adverse quality conditions. He shall also notify the Manager-Quality Assurance (Station).

B. Station Manager - The Station Manager considers the Quality Assurance Department representative's determination of the necessity to stop work.

1. If he concurs with the decision to stop work he initiates the necessary corrective action. Only after the discrepancy has been corrected and approved by the Quality Assurance Department representative does work resume.

2. In the event the Station Manager does not concur with the Quality Assurance Department representative's decision to stop work, he may order work to resume by notifying the Manager-Quality Assurance and the appropriate station supervisory personnel in his organization of his decision. He shall notify the Vice President-Nuclear of his course of action.

C. Vice President-Nuclear - The Vice President-Nuclear is responsible for approving or disapproving the Station Manager's decision in those cases where the Station Manager does not concur and orders work to resume.

D. Manager-Quality Assurance - The Manager-Quality Assurance (Station) may refer any concerns he may have concerning the handling of "stop work" to the Vice President-Nuclear or to the Manager-Quality Assurance (Corporate). He may direct imposition of "stop work" whenever he deems such action to be appropriate.

17.2.1.5 Organization - Each nuclear power station's Technical Specifications contain the company's organizational requirements for facility operation and corporate management.

Differences of opinion between QA personnel and other departments are resolved either at the station level by the Station Manager and the Manager - Quality Assurance or are forwarded through normal administrative chains of both individuals for resolution at the corporate level. Final decision-making authority rests with the Senior Vice President-Power.

17.2.2.2 Quality Assurance Program

The Company Quality Assurance Program is displayed in a point-by-point comparison to Appendix B, 10 CFR 50 in Table 17.2.2, which follows.

TABLE 17.2.2

Appendix B 10 CFR 50 Criterion	Topical Report Section	Title	Abstract
I	17.2.1	Organization	Defines the relationship of departments to the quality assurance effort associated with the operation of the nuclear power station.
II	17.2.2	Quality Assurance Program	Defined the Operational Quality Assurance Program, its overall responsibility and provisions.
III	17.2.3	Design Control	Defines the policy, responsibility and procedures for exercising design control.
IV	17.2.4	Procurement Document Control	Establishes policy applicable to plant operation and maintenance.
V	17.2.5	Instructions, Procedures and Drawings	Establishes guidelines for preparing instructions, procedures and drawings.
VI	17.2.6	Document Control	Establishes policy for the control of procedures and instructions.
VII	17.2.7	Control of Purchased Material, Equipment and Services	Establishes methods for assuring that purchased items conform to the specified quality requirements.
VIII	17.2.8	Identification and Control of Material, Parts and Components	Establishes procedures for the identification and control of material, parts and components.
IX	17.2.9	Control of Special Processes	Establishes procedures which assure that special processes are controlled and accomplished by qualified personnel.

17.2.2.3 Identification of Structures, Systems and Components

Safety related structures, systems and components are identified in the UFSAR. The portions of these structures, systems, and components that are within the scope of the Operational Quality Assurance Program are further identified in the respective nuclear power station administrative procedures.

17.2.2.4 Periodic Review of the Operational Quality Assurance Program

An audit of the operational quality assurance program will be conducted at least once per 24 months. Further, an on-going quality assurance program review is conducted by the Safety Evaluation and Control Staff as delineated in station Technical Specifications.

17.2.2.5 Personnel Qualification Requirements

The Manager - Quality Assurance (Corporate) shall have a four-year accredited engineering or science degree or equivalent with a minimum of 10 years experience related to electric power generating facilities. At least 5 years of overall experience shall have been in a supervisory capacity, 2 years of which should have involved quality assurance related matters.

The Manager - Quality Assurance (Station) shall have a four-year accredited engineering or science degree or equivalent with a minimum of 8 years experience related to electric power generation facilities, 2 years of which involve experience in nuclear power stations. At least 4 years of overall experience shall have been in a supervisory capacity, 2 years of which should have involved quality assurance related matters.

The Supervisors - Quality shall have a four-year accredited engineering or science degree or equivalent. A minimum of 2 years overall experience or equivalent training in power plant operations is a prerequisite with at least 1 year of this experience involved in nuclear power station quality assurance program implementation.

Replacement personnel in the key positions listed will meet or exceed the applicable requirements of ANSI/ANS 3.1 (Draft 12/79) as clarified in Table 17.2.0.

17.2.3 DESIGN CONTROL

NOD Standards describe the design control program. Measures are established to assure that applicable regulatory requirements and the nuclear power station design bases are correctly translated into the Company specifications, drawings, procedures, and instructions applicable to design changes and/or modifications for the operating nuclear power station.

All design changes and/or modifications to safety related structures, equipment, systems and components described in the UFSAR are reviewed, approved, and acted upon by the Station Nuclear Safety and Operating Committee in accordance with their responsibilities and functions as referenced in the Technical Specifications. Design changes to these structures, equipment, systems and components approved by the Station Nuclear Safety and Operating Committee are forwarded to the Safety Evaluation and Control Staff for an independent review. This review may be performed by Safety Evaluation and Control Staff personnel, the staff of other company departments, qualified outside contractors, or consultants. The responsibility for the development, identification of requirements, monitoring, and implementation of an effective design control program within the station organization is delegated to the Station Manager with input as appropriate from operations personnel.

The Nuclear Design Control Manual (NDCM), delineates procedures that assure design changes, including field changes, are subject to design control measures commensurate with those applied to the original design and the applicable specified design requirements. These procedures assure that design basis, regulatory requirements, codes and standards are correctly translated into specifications, drawings, procedures, or instructions for those structures, systems and components classified as safety related in the UFSAR. The NDCM provides for verifying or checking the adequacy of design, such as by the performance of design reviews, by the use of alternate or simplified calculational methods, or by the performance of a suitable testing program. When a testing program is solely used to test the adequacy of a design, the test will be conducted under adverse design conditions. The provisions of this section assure that the verifying or checking process is performed by individuals other than those who performed the original design. These individuals are identified and their authority and responsibility is described. The NDCM also identifies the design documents that are required to be reviewed and the personnel responsible for their review and revisions, to assure that design characteristics can be controlled, inspected and tested, and that inspection and test criteria are identified. Design change documents and revisions thereto are distributed to responsible supervisors to determine whether revisions to controlled design and operating documents are necessary. Design documents and reviews, records and changes thereto are collected, stored and maintained in a systematic and controlled manner.

The NDCM establishes measures for the selection and review for suitability of application of materials, parts, equipment and processes that are essential to the safety-related functions of the systems, structures and components. These measures include the use of valid and applicable industry standards and specifications, materials and prototype hardware testing programs, and design reviews. In the event of a design modification to a system which is safety related, engineering studies

are initiated to evaluate parts, equipment, processes, and material suitability for repair of such equipment or components; previously approved items are used without further review. Previously approved materials, parts or components used for a different application are reviewed for suitability prior to approval for their new application.

Quality measures are assured through all levels of the design control program by the design control organization, the Design Control Engineer, Engineering Supervisor, Director-Safety Evaluation and Control and the Station Nuclear Safety and Operating Committee. Any errors or deficiencies noted in the design process are documented on the design change forms and subsequently corrected.

Procedures for design controls, analysis, and reviews have as their basis the applicable portions of documents referenced in the Nuclear Design Control Manual, and include ANSI N45.2.11 - 1974 as modified in Table 17.2.0.

The NDCP Instruction Manual for Architect/Engineers establishes procedures to describe the design interface between the Company and contractors for the review, approval, release, distribution, and revision of documents involving design interfaces.

Suitable design controls are applied to such disciplines as reactor physics; seismic stress, thermal, hydraulic, radiation and accident analysis; compatibility of materials; and accessibility for in-service inspection, maintenance and repair. Designs are reviewed to assure that (1) design characteristics can be controlled, inspected and tested, and (2) inspection and test criteria are identified.

Changes to non safety related structures, systems, and components will be controlled in accordance with applicable station procedures and to meet the requirements, where applicable, of 10 CFR 50.59.

17.2.10 INSPECTION

Inspection procedures for those activities affecting quality have been established. These procedures govern the inspection and documentation of activities relating to repairs, modifications, and changes made to safety related systems, structures and components. Written maintenance procedures are provided which include inspection hold points.

Examinations, measurements or tests of materials or components associated with safety related equipment and systems are performed for each work operation, where necessary, to assure quality. If inspection is impossible or disadvantageous, indirect control by monitoring methods, equipment, and personnel is provided. Both methods are provided when control is inadequate without both.

The station safety related maintenance procedures (including modification procedures) are reviewed to determine the need for an independent inspection and the degree and method if such an inspection is required. Examinations, measurements or tests that require witnessing are identified as "Inspection Hold" points in procedures. The inspection performed at a hold point is specific in nature; quality characteristics and acceptance/rejection criteria are included or qualitative criteria such as operability checks, compliance with procedural step or cleanliness instructions are specified, and the inspection is documented by signature or initials on the written procedure form.

The power station Quality Assurance Department performs physical inspections, at random spot intervals to ensure quality requirements are met. These checks are performed as the conditions of the maintenance warrant. These personnel and other inspectors are qualified in accordance with codes and standards as applicable to the function they are performing.

The inspection program requires that inspectors be assigned as appropriate for the activity being inspected. An inspector may be a member of the organization performing the activity, but must be a qualified individual other than the person performing the activity or the supervisor directly responsible for the activity. Personnel so assigned shall become familiar with the procedure being used and other pertinent documents such as technical manuals and drawings prior to performing the inspection.

Personnel responsible solely for the conduct of nondestructive examination are qualified to SNT-TC-1A, 1980 Edition, except as amended by 1WA-2300. Audits and reviews of their findings and associated corrective actions are periodically conducted by quality assurance personnel to assure that these procedures are being carried out in a quality manner. The inspectors qualifications are periodically reviewed for recertification.

17.2.15 NONCONFORMING MATERIALS, PARTS AND COMPONENTS

A documented system for controlling nonconformances observed during receipt inspection, storage, fabrication and erection, installation, initial and/or acceptance testing or initial operation is established and provides for the preparation, issuing and distribution of Nonconformance Reports in accordance with prescribed procedures. These procedures apply to all new or reworked materials, parts, or components which possess manufacturer/supplier caused nonconformances that are identified prior to the materials, parts or components being accepted and placed in service. They do not apply to failure in service.

The identification, documentation, segregation, review, disposition and notification to affected organizations of nonconforming material, parts or components, are described or referenced in station Technical Specifications, station administrative procedures, and/or station operating procedures. Nonconformance of purchased services are controlled under Section 17.2.7 Control of Purchased Material, Equipment and Services, Section 17.2.10 Inspection, and station administrative procedures.

Specifically, instructions require that the individual discovering a nonconformance identifies, describes and documents the nonconformance on a Nonconformance Report. This report is further distributed to the Station Manager/designee. The Station Manager/designee assigns corrective action to be taken or disposition to be made of the nonconformance including the assignment of the individual or group responsible. This procedure requires the corrective action or disposition of the nonconformance to be documented on the Nonconformance Report and signed by the person completing the corrective action or disposition.

When a nonconforming item is identified, it is placed in the hold area established in the storeroom or other segregated location, if practical, and identified with a Hold tag to prevent its inadvertent use. Items considered totally rejectable are identified by a Reject tag and disposed of as determined by the Station Manager.

"Hold" items may be released on a risk basis following the documented approval of such risk release by the Station Manager on a "Release on a Risk Basis" form. Each risk release is handled on a case basis and depends on the nature of the hold status. The basis and conditions of the release are described on the form, including the criteria for clearing the original hold status. Rejected material is not risk released.

A Nonconformance Report dispositioned "accept as is" requires an engineering analysis and approval. The results of this review and approval are documented and become a part of station records.

Should the disposition of a nonconformance require the rework or repair of materials, parts, components, systems or structures such rework or repair is reinspected or retested by a method which is at least equal to the original inspection or test method. The inspection requirements and the inspection, rework or repair procedures are documented and become a part of station records.

17.2.17 QUALITY ASSURANCE RECORDS

The requirements and responsibilities for quality assurance records transmittal, retention, and maintenance subsequent to completion of work at the power station have been established and are documented in station administrative procedures.

Quality Assurance records relating to the operating status of the station and documentary evidence of the quality of items and activities affecting quality are maintained in accordance with the Technical Specifications and station administrative procedures. These records include plant history; operating logs; principal maintenance and modification activities; Licensee Event Reports; results of reviews, inspections, tests, audits and material analysis; monitoring of work performance, qualification of personnel, procedures and equipment; and other documentation such as drawings, specifications, procurement documents, calibration procedures and reports, nonconformance reports and corrective action reports.

Identification and retrievability of these records is facilitated through proper indices and an established basic filing system. Record storage facilities are constructed, located and secured to prevent the destruction of records by fire, flooding, theft, and deterioration through environmental conditions such as temperature and humidity.

The Quality Assurance Department monitors these records to assure their completeness, adequacy, retrievability, and protection. They periodically audit these records to verify implementation of established policies and procedures. The record storage facilities conform to Regulatory Guide 1.88, Rev. 2 October 1976, as stated in Table 17.2.0.

If the Supervisor - Quality determines the station response to an audit is unacceptable; if a response is not received in the time allotted; or if corrective action is not accomplished as indicated on the station response, the matter is brought to the attention of the Manager - Quality Assurance, who notifies the Station Manager for resolution. If the Manager, Quality Assurance (Station) does not agree with the resolution proposed, he notifies the Manager, Quality Assurance (Corporate) for referral to appropriate levels of management in accordance with established escalation procedures.

The responsibility for analyzing audit reports for trends and effectiveness lies with the Manager - Quality Assurance. As trends are discovered or the effectiveness of the program is in question, the analysis of the Manager - Quality Assurance is forwarded to the management level consistent with the seriousness of the problem. The management level attained could be as high as the Senior Vice President - Corporate Technical Services or the Senior Vice President - Power.

SYNOPSIS OF CHANGES TO TOPICAL REPORT

(1) Section: 17.2.0 Old Page: New Page: 17.2-33a Title: Regulatory Guide 1.74	Adds a paragraph which defines the terms for time intervals except for those defined in Technical Specifications.
(2) Section: 17.2.0 Old Page: 17.2-36 New Page: 17.2-36 Title: Regulatory Guide 1.88	Changes wording to allow storage of nuclear quality assurance records in the vital records vault located at the Innsbrook Technical Center
(3) Section: 17.2.0 Old Page: 17.2-38 New Page: 17.2-38 Title: Regulatory Guide 1.88	Deletes reference to microfilming which is no longer accomplished in this area and adds a sentence to allow storage of nuclear quality assurance records in the vital records vault located at the Innsbrook Technical Center
(4) Section: 17.2.1.1 B, C Old Page: 17.2-54 New Page: 17.2-54 Title: General Descriptions	Reflects the change in corporate organization which revises the responsibilities of the Senior Vice President-Power, eliminates the Senior Vice President-Engineering and Construction, and establishes the Office of Senior Vice President - Corporate Technical Services.
(5) Section: 17.2.1.2A Old Page: 17.2-54-57 New Page: 17.2-54-58 Title: Nuclear Operations	Reorganizes the descriptions of the various groups, stations, departments, and sections and their responsibilities along more functional lines.
(6) Section: 17.2.1.2A.2 Old Page: 17.2-54 New Page: 17.2-56 Title: Manager-Nuclear Operations Support	Reflects the change in corporate organization which deletes inservice inspection from the responsibilities assigned.

SYNOPSIS OF CHANGES TO TOPICAL REPORT (CONT'D)

(7) Section: 17.2.1.2A.2a Old Page: 17.2-55 New Page: 17.2-56 Title: Director-Health Physics/Chemistry	Adds responsibility for chemistry support services
(8) Section: 17.2.1.2A.2b Old Page: 17.2-55 New Page: 17.2-56 Title: Director-Operations and Maintenance Support	Deletes responsibility for chemistry support and ISI programs.
(9) Section: 17.2.1.2A.3 Old Page: New Page: 17.2-56 Title: Manager-Nuclear Programs	Reflects the change in corporate organization which placed Nuclear Programs and Nuclear Licensing under separate managers.
(10) Section: 17.2.1.2A.4 Old Page: 17.2-55 New Page: 17.2-56 Title: Manager-Nuclear Licensing	Reflects the change in corporate organization which placed Nuclear Programs and Nuclear Licensing under separate managers.
(11) Section: 17.2.1.2A.1c Old Page: 17.2-56 New Page: 17.2-55 Title: Superintendent-Operations/et. al.	Reflects change in station organization which deleted the position of Superintendent - Projects
(12) Section: 17.2.1.2A.5 Old Page: 17.2-58 New Page: 17.2-57 Title: Manager-Nuclear Site Services	Reflects the change in corporate organization which changes the title of Manager-Projects (Nuclear) to Manager-Nuclear Site Services and changes his reporting responsibilities to the Vice President-Nuclear.

SYNOPSIS OF CHANGES TO TOPICAL REPORT (CONT'D)

(13) Section: 17.2.1.2A.5a Old Page: 17.2-58 New Page: 17.2-57 Title: Superintendent-Site Services	Reflects the change in corporate organization which changes the title of Project Manager to Superintendent-Site Services
(14) Section: 17.2.1.2A.5b Old Page: New Page: 17.2-58 Title: Superintendent-Radiological Waste Project	Adds the position of Superintendent-Radiological Waste Project
(15) Section: 17.2.1.2A.6 Old Page: New Page: 17.2-58 Title: Manager-Nuclear Training	Reflects the change in corporate organization which assigns the reporting responsibilities of the Manager-Nuclear Training to the Vice President-Nuclear.
(16) Section: 17.2.1.2B Old Page: 17.2-57 New Page: 17.2-58 Title: Power Engineering Services	Reflects the change in corporate organization which deletes the Engineering and Construction Department and establishes Power Engineering Services. Also, the change assigns responsibility for inservice inspection, for nondestructive examination, and for nuclear analysis and fuel.
(17) Section: 17.2.1.2B.1 Old Page: 17.2-57 New Page: 17.2-58 Title: Manager-Nuclear Engineering	Removes responsibilities in the nuclear fuel and radiation protection areas and redefines responsibilities in accordance with corporate reorganization.
(18) Section: 17.2.1.2B.2 Old Page: New Page: 17.2-58a Title: Manager-Nuclear Analysis and Fuel	Establishes the Nuclear Analysis and Fuel Department.

SYNOPSIS OF CHANGES TO TOPICAL REPORT (CONT'D)

(19) Section: 17.2.1.2B.3 Old Page: New Page: 17.2-58b Title: Manager-ISI/NDE Services	Establishes the ISI/NDE Services Department
(20) Section: 17.2.1.2B.4 Old Page: New Page: 17.2-58b	Provides responsibilities for the Manager of Civil, Electrical, and Mechanical Engineering.
(21) Section: 17.2.1.2D Old Page: 17.2-59 New Page: 17.2-59 Title: Manager - Quality Assurance	Title of Executive Manager - Quality Assurance has been changed to Manager - Quality Assurance to reflect changes in corporate organization. Also, his reporting responsibilities have been changed to the Senior Vice President-Corporate Technical Services.
(22) Section: 17.2.1.2D.1 Old Page: 17.2-59 New Page: 17.2-59 Title: Manager - Quality Assurance	Title of Executive Manager - Quality Assurance has been changed to Manager - Quality Assurance to reflect changes in corporate organization.
(23) Section: 17.2.1.2D.2 Old Page: 17.2-60 New Page: 17.2-59 Title: Manager - Quality Assurance - Engineering and Vendor Surveillance	Title of Executive Manager - Quality Assurance has been changed to Manager - Quality Assurance to reflect changes in corporate organization.
(24) Section: 17.2.1.2D.2a Old Page: 17.2-60 New Page: 17.2-60 Title: Supervisor-Quality	Changes the number of Supervisors from four to a minimum of four to provide organizational flexibility.

SYNOPSIS OF CHANGES TO TOPICAL REPORT (CONT'D)

(25) Section: 17.2.1.4D Old Page: 17.2-61 New Page: 17.2-61 Title: Manager - Quality Assurance	Title of Executive Manager - Quality Assurance has been changed to Manager - Quality Assurance to reflect changes in corporate organization
(26) Section: 17.2.1.5 Old Page: 17.2-61 New Page: 17.2-61 Title: Organization	Reflects changes to stations Technical Specifications which have deleted organizational charts.
(27) Section: 17.2.2.1 Old Page: 17.2-63 New Page: 17.2-63 Title: General Description	Reflects the change in organization which changed the title of Senior-Vice President-Power Operations to Senior Vice President-Power.
(28) Section: Table 17.2.2-III Old Page: 17.2-64 New Page: 17.2-64 Title: Design Control	Changes wording in "Abstract" to more clearly define section of report.
(29) Section: 17.2.2.5 Old Page: 17.2-66 New Page: 17.2-66 Title: Personnel Qualification Requirements	Title of Executive Manager - Quality Assurance has been changed to Manager - Quality Assurance to reflect changes in corporate organization
(30) Section: 17.2.3 Old Page: 17.2-68, 69 New Page: 17.2-68, 69 Title: Design Control	Includes the NOD Standards in the design control program and reflects the change in nomenclature of the Nuclear Design Control Manual (formerly the Nuclear Design Control Interface Manual). Also, the NDCP Instruction Manual for Architect/Engineers is specified as describing the design interface between the Company and Contractors.

SYNOPSIS OF CHANGES TO TOPICAL REPORT (CONT'D)

(31) Section: 17.2.10 Old Page: 17.2-77 New Page: 17.2-77 Title: Inspection	Specifies the edition of SNT-TC-1A (as amended) that is required by the 1983 Summer Addendum of ASME Section XI
(32) Section: 17.2.15 Old Page: 17.2-83 New Page: 17.2-83 Title: Nonconforming Materials, Parts, and Components	Clarifies the use and distribution of Nonconformance Reports.
(33) Section: 17.2.17 Old Page: 17.2-87 New Page: 17.2-87 Title: Quality Assurance Records	Changes wording to allow storage of nuclear quality assurance records in the vital records vault located at the Innsbrook Technical Center
(34) Section: 17.2.18 Old Page: 17.2-89 New Page: 17.2-89 Title: Audits	Title of Executive Manager - Quality Assurance has been changed to Manager - Quality Assurance to reflect changes in corporate organization
(35) Section: 17.2.18 Old Page: 17.2-89 New Page: 17.2-89 Title: Audits	Reflects the change in corporate organization which deleted Engineering and Construction and established Corporate Technical Services.