



July 30, 1979
L-79-202

Office of Nuclear Reactor Regulation
Attention: Walter P. Haass, Chief
Quality Assurance Branch
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Haass:

Re: Florida Power & Light Company QA Topical Report,
FPLTQAR 1-76A, Proposed Revision 3

Attached are forty copies of a revision to Appendix C of the FPL Topical Quality Assurance Report. The revision provides an alternative to the ANSI N45.2.2-1972 requirement for inspection of rigging and handling equipment. This is identical to the advance copy of the alternative that was telecopied to Mr. Liederbach, of your office, on July 13, 1979. Please include this page (Page 6 of 6) with Revision 3 which is currently under review.

Very truly yours,

J. A. De Mastry
pr
R. E. Uhrig
Vice President

REU:JMB:bt

Attachments

cc: Mr. James P. O'Reilly, Office of I&E, Region II
A. Schwencer, Chief, Operating Reactors Branch I
Robert Lowenstein, Esquire

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TOPICAL QUALITY ASSURANCE REPORT

Appendix C

BASELINE DOCUMENT MATRIX

Rev. 3
Date July 10, 1979
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ANSI N45.2.4-1972

ANSI N45.2.4-1972, Paragraph 2.5.2 requires that equipment be "suitably marked to indicate date of next required calibration". In lieu of marking equipment, FPL has chosen to control calibration of installed instrumentation and control equipment by maintaining records for each piece of equipment by instrument tag number (or equivalent) to show that established schedules and procedures for calibration have been followed.

ANSI N45.2.11-1974

ANSI N45.2.11-1974, Paragraph 11.4 requires that "audits shall include an evaluation of design quality assurance policies, practices, procedures and instructions" FPL's design quality assurance (and all other QA elements') policies, procedures and instructions are included in FPL's Quality Assurance Program documentation. The Quality Assurance Department evaluates all of this documentation in reviews performed during development and revision. Accordingly, FPL does not require subsequent (and redundant) evaluations of these Quality Assurance Program policies, procedures and instructions during audits. FPL audits will include evaluations of the adequacy of the practices which are the implementation of these policies, procedures and instructions.

ANSI N45.2.2-1972

ANSI N45.2.2-1972, Paragraph 7.4 requires that an inspection program be established for handling equipment and rigging, including methods for identifying acceptable and nonconforming items. In lieu of having a program of periodic, documented inspections of rigging and handling equipment, FPL's practice at operating plants is to have the individual user determine the equipment's acceptability prior to each use. This practice also precludes the need for a system to indicate the acceptability of rigging and handling equipment. Installed cranes are inspected on a periodic basis and will not be subjected to this prior-to-use inspection.