



August 13, 1979
L-79-224

Mr. Walter P. Haass, Chief
Quality Assurance Branch
Division of Project Management
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Haass:

SUBJECT: Florida Power & Light Company QA Topical Report
FPL/TQAR 1-76A, Proposed Revision 3

Your letter of June 25, 1979, provided us with the NRC position that a clearer commitment by FPL to the QA related regulatory guides and ANSI standards is needed. You stated that "...the last paragraph on page 1 of Appendix C should be modified to indicate that FPL will comply with the regulatory positions of the regulatory guides. Otherwise, FPL should state any exceptions to such regulatory positions and also state equivalent FPL alternatives for our evaluation".

It has always been FPL's objective to have a sound, comprehensive Quality Assurance Program that will meet 10CFR50, Appendix B, and provide adequate confidence that safety related systems will perform satisfactorily. We believe that our Topical Quality Assurance Report as currently written and implemented satisfies this objective. Our meeting the intent of the documents listed in Appendix C (with several approved alternatives) is a major factor, but not the only factor, that provides the basis for our conclusion.

We had originally proposed the wording "meets the intent of" due to the lack of specificity and inconsistency among the standards and to avoid differing interpretations of the wording of the standards by NRC inspectors. The NRC approved that wording for our original Topical QA Report and its subsequent two revisions. To change the philosophy and the wording as you have directed will not, in our opinion, provide a higher degree of assurance. However, the change will necessitate a significant increase in the number of alternative positions and some adjustments to FPL's internal QA Program documentation.

Accordingly, we have begun a systematic comparison of our QA Program documentation against the specific wording of QA regulatory guides and ANSI standards. (Your instructions to change the wording in our Topical QA Report leads us to the conclusion that the enforcement of the words "comply with the regulatory positions" will be more stringent and exacting than the enforcement of the wording and philosophy of "meeting the intent of" the documents listed in Appendix C.) The developing of the clearer commitment to the exact wording of the regulatory guides and standards will be an evolving process as additional alternative statements are submitted to the NRC as a result of our systematic comparison. When this process is completed, we will change the last paragraph on page 1 of Appendix C to show this clearer commitment. This comparison is scheduled to be performed in conjunction with our regular two year audit cycle.

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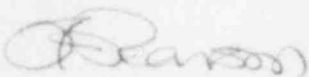
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PEOPLE... SERVING PEOPLE

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Should you have any questions regarding the above, please feel free to contact Mr. Jack Vessely on (305) 552-3957.

Very truly yours,



Robert E. Uhrig
Vice President

REU:AES:pbg

cc: A. Schwencer, Operating Reactors Branch #1
J. P. O'Reilly, Region II
Robert Lowenstein, Esquire