PACIFIC GAS AND ELECTRIC COMPANY

PG&E

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J. O. SCHUYLER
VICE PRESIDENT
NUCLEAR POWER GENERATION

June 10, 1983

Mr. John B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596-5368

Re: Docket No. 50-275, OL-DPR-76
Docket No. 50-323
Diablo Canyon Units 1 and 2
Proposed FSAR Revision per 10 CFR 50.54

Dear Mr. Martin:

Enclosed is a proposed change to Chapter 17 of the Diablo Canyon Power Plant Final Safety Analysis Report for your review and approval per 10 CFR 50.54. The enclosure would replace Chapter 17 in its entirety.

The present Chapter 17 description paraphrasing the Quality Assurance Manual has been replaced by directly referencing the Manual. The position of the Manager, Quality Assurance, has been revised to report to a higher level of executive management.

The enclosed description includes:

- A current description of the Company organization including functional responsibilities for quality and the position and responsibilities of the Quality Assurance Department.
- A description of the documents prescribing the program, their applicability, maintenance, and control.
- Program commitments in the form of a list of governing Regulatory Guides and industry standards.

B001
1/1

RETURN ORIGINAL TO REGION V

83-127

These changes should be acceptable since the criteria of Appendix B are addressed by direct reference and no previously accepted commitments have been reduced.

Sincerely,

J. O. Schuyler

Enclosure

cc w/enc: Mr. John Carlson
NRC Resident Inspector
Diablo Canyon Power Plant
P. O. Box 56
Avila Beach, CA 93424

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Service List

17.0 QUALITY ASSURANCE

17.1 ORGANIZATION

The Company's efforts toward assuring the quality and safety of its nuclear power plants is organized in a structured manner with clearly defined levels of authority, assignments of responsibility, and lines of communication. Assignment of responsibility for an item or activity includes responsibility for its quality. The position of the Quality Assurance Department in the corporate structure is shown in Figure 17.1-1, Corporate Organization.

PGandE acknowledges full responsibility to its employees, stockholders, the general public, and affected governmental regulatory agencies for the establishment and execution of the Quality Assurance Program prescribed by the Quality Assurance Manual. The work of executing selected portions of this Quality Assurance Program may be delegated to organizations external to PGandE; however, in all such instances PGandE retains overall responsibility.

Specific responsibilities pertaining to quality assurance matters are assigned by the Manual and its implementing procedures and instructions to various individuals throughout the Company. In each instance, the assignment of a responsibility to an individual includes with it a commensurate delegation of sufficient authority that the person can, in fact, fulfill that responsibility. Unless otherwise specifically prohibited, it is understood that the functions, tasks, and activities necessary to carry out a responsibility may be delegated to and performed by other qualified individuals.

Figure 17.1-1 depicts the overall organizational structure of PGandE. Figure 17.1-2 is an abbreviated version of Figure 17.1-1 which identifies only those individuals and organizational components of PGandE with direct responsibilities related to the quality of the design, construction, and operation of the Company's nuclear power plants. The narrative description throughout this section is based primarily on Figure 17.1-2.

THE VICE PRESIDENT, COMPUTER SYSTEMS AND SERVICES, is responsible for the development, control, and maintenance of centralized computer systems used for safety-related information storage, processing, or analysis. He also provides computer hardware and software support services to other functional groups, when requested.

THE EXECUTIVE VICE PRESIDENT AND GENERAL MANAGER OF UTILITY OPERATIONS is responsible to the Chairman of the Board and Chief Executive Officer for the corporate personnel functions, corporate relations with the government and public, and for general utility operations. Reporting to him through the Senior Vice President, Operations, and the Vice President, General Services, is the Manager, Materials.

THE MANAGER, MATERIALS, is responsible for providing a centralized procurement function for the Company. This includes responsibility for the procurement of all materials, equipment, services, and supplies, except uranium and emergency diesel fuel, for the Company's nuclear power plants. With respect to such nuclear purchases, the Manager's responsibility and authority is limited to the commercial and administrative aspects of those procurements. He obtains the necessary technical and quality input to such purchases from the appropriate technical groups and assures those requirements are included in the procurement documents transmitted to potential suppliers. He coordinates and participates in the bid evaluation process, and is responsible to evaluate the suppliers and their bids relative to the commercial aspects of the procurement. Subsequent to award, he is responsible for administration of the contract and serves as the primary interface point for all contacts between PGandE and the supplier.

THE SENIOR VICE PRESIDENT AND GENERAL COUNSEL is responsible to the Chairman of the Board and Chief Executive Officer for Company legal and other corporate matters. Reporting to him through the Vice President and General Attorney are the Attorney (Corporate Law) and the Manager of Safety, Health and Claims.

THE ATTORNEY (CORPORATE LAW) is responsible to the Vice President and General Attorney for all legal matters involving the U.S. Nuclear Regulatory Commission. The Attorney's direct responsibility and authority is limited to the legal aspects of the situation. The technical and quality information is

input to such matters by the appropriate technical group within the Company, such as Engineering or Quality Assurance.

THE MANAGER OF SAFETY, HEALTH AND CLAIMS is responsible to the Vice President and General Attorney for the development and administration of the Company's accident prevention program.

THE EXECUTIVE VICE PRESIDENT, FACILITIES AND ELECTRIC RESOURCES DEVELOPMENT, is responsible for the design and construction of all PGandE power plants and for the operation of the Company's nuclear power plants. The Executive Vice President reports to the President for all power plants' development projects except for the Diablo Canyon Power Plant; for Diablo Canyon he reports to the Chairman of the Board and Chief Executive Officer. Reporting directly to the Executive Vice President are the Vice Presidents of Engineering, Planning and Research, General Construction, and Nuclear Power Generation and the Manager, Quality Assurance. Also reporting to the Executive Vice President may be one or more Project Managers.

THE VICE PRESIDENT, PLANNING AND RESEARCH, is responsible for providing specialized support services of a scientific, engineering, or technical nature which are required by other Company organizational units such as Engineering, General Construction, and Nuclear Plant Operations.

THE CHIEF, ENGINEERING RESEARCH, is responsible to the Vice President, Planning and Research, for providing specialized support services in the field of metallurgy, chemistry, geology, health physics, test equipment calibration and repair, and acoustics; in the ecological and environmental sciences; and experimental or developmental work in the mechanical, electrical, and civil engineering disciplines. In addition to a general responsibility to provide specialized support services of the described nature when requested by others, the Chief of Engineering Research has also been specifically charged with development and qualification of any and all metallurgical process procedures required by the Company (such as for welding, chemical cleaning, coating, and heat treatment), and development of any and all nondestructive examination procedures required by the Company.

THE BOARD OF DIRECTORS OF PGandE is responsible for all facets of the Company's business. The Board of Directors is the single entity within the Company having full cognizance over all aspects of the design, construction, and operation of PGandE nuclear power plants and, thus, over the development and implementation of the Quality Assurance Program.

THE CHAIRMAN OF THE BOARD AND THE PRESIDENT OF PGandE are accountable to the Board of Directors and jointly establish the corporate polices, goals, and objectives related to the quality of all of the Company's activities and operations. Those corporate policies, goals, and objectives which pertain to the design, construction, and operation of the Company's nuclear power plants are embodied in the Quality Assurance Manual. The Policy Sections of the Quality Assurance Manual will be approved by both the Chairman of the Board and the President.

Current operations of the Company, including such administrative services as corporate planning, legal services, financial control, and public relations, are organized under and responsible to the Chairman of the Board and Chief Executive Officer. Among those reporting directly to the Chairman of the Board and Chief Executive Officer are the Executive Vice President for Finance, the Executive Vice President and General Manager of Utility Operations, and the Senior Vice President and General Counsel. For Diablo Canyon, the Executive Vice President, Facilities and Electric Resources Development, also reports directly to the Chairman of the Board and Chief Executive Officer.

Planning and development of the Company's future energy resources is organized under the direction of the President. The functions of this group include such activities as planning and research, engineering, construction, and Humboldt Bay Plant operations. Among those reporting directly to the President are the Executive Vice President, Fuels and Gas Resources Development, and the Executive Vice President, Facilities and Electric Resources Development.

THE EXECUTIVE VICE PRESIDENT, FINANCE, is responsible for corporate financial matters and for management of the Company's computer facilities. Reporting to him through the Vice President, Computer Systems and Services, is the Manager of Engineering Computer Applications.

THE VICE PRESIDENT, ENGINEERING, is responsible to the Executive Vice President, Facilities and Electric Resources Development, for all technical aspects of the engineering and design of PGandE power plant structures, systems, and components, including any changes or modifications to them during the lifetime of the plant.

Reporting directly to the Vice President, Engineering, are the Chief Civil Engineer, the Chief Electrical Engineer, the Chief Mechanical and Nuclear Engineer, the Chief of Design Drafting, the Chief of Engineering Quality Control, and the Chief of Engineering Services. Each of these individuals is responsible to the Vice President, Engineering, for the administration of their department and for the technical aspects of the engineering and design work related to their discipline.

THE VICE PRESIDENT, GENERAL CONSTRUCTION, is responsible to the Executive Vice President, Facilities and Electric Resources Development, for the construction of Company power generation and gas and electric transmission facilities, including switching stations and related distribution systems and equipment as assigned. This responsibility commences with the inception of construction planning and, with respect to the Company's nuclear plants, extends to and includes the development, scheduling, and implementation of the preoperational and startup test programs. Subsequently, the Vice President provides requested construction management and allied support services to the operating plant to assist in the performance of maintenance, modification, or repair activities.

THE MANAGER, STATION CONSTRUCTION, is responsible to the Vice President, General Construction, for the construction of Company steam, hydro, and other electric generation power plants, electric transmission and distribution substations, and communication facilities. Reporting to the Manager, Station Construction, through Construction Superintendents, are Senior Site Representatives (Project Superintendent/Resident Engineer, or other appropriate title). The Senior Site Representative at each site is responsible for implementation of the construction plans and schedules and for general management of the onsite construction activities.

THE VICE PRESIDENT, NUCLEAR POWER GENERATION, is responsible to the Executive Vice President, Facilities and Electric Resources Development, for the safe and

efficient operation of the Company's nuclear power plants. Reporting directly to him are the Manager, Nuclear Plant Operations, and the Technical Assistant to the Vice President. The Vice President, Nuclear Power Generation, approves and signs official Company correspondence with the U.S. Nuclear Regulatory Commission or their representatives.

THE MANAGER, NUCLEAR PLANT OPERATIONS, is responsible for directing and controlling the operation of the Company's nuclear power plants. In fulfilling this responsibility, the Manager provides administrative, functional, and technical guidance to the plant staffs in such matters as plant operations, maintenance, management and utilization of uranium fuels, management of wastes, refueling, nuclear security, and training and qualification of plant operating personnel. The Manager, Nuclear Plant Operations, develops and coordinates implementation of the site and corporate emergency plans. He is also responsible to coordinate all Company activities related to amending, revising, or otherwise changing the NRC issued plant operating licenses.

Reporting to the Manager, Nuclear Plant Operations, are the Diablo Canyon Plant Manager, the Humboldt Bay Plant Superintendent, a staff of offsite technical support personnel, and the Diablo Canyon and Humboldt Bay Plant Staff Review Committees.

THE DIABLO CANYON PLANT MANAGER and HUMBOLDT BAY PLANT SUPERINTENDENT are each responsible to the Manager, Nuclear Plant Operations, for the conduct of all onsite activities related to the safe and efficient operation of their assigned plants. Each is responsible to develop and each has been delegated the necessary authority to approve and direct the implementation of those programs, procedures, and instructions required for the operation of his assigned plant, within limits established by the Technical Specifications, Quality Assurance Program, and administrative guidelines established by the Manager, Nuclear Plant Operations.

THE TECHNICAL ASSISTANT TO THE VICE PRESIDENT, NUCLEAR POWER GENERATION, is responsible to the Vice President for administrative coordination of the activities of Nuclear Power Generation. The Onsite Safety Review Groups of the Company's nuclear power plants report to the the Technical Assistant.

THE MANAGER, QUALITY ASSURANCE, is responsible to the Executive Vice President, Facilities and Electric Resources Development, for management of the Quality Assurance Program and to assure that the Quality Assurance Program prescribed by the Quality Assurance Manual is implemented and complied with by all involved organizations, both internal and external to PGandE. The Chairman of the Board and the President have given him the organizational freedom and delegated the requisite authority to investigate any area or aspect of the Company's operations as necessary to identify and define problems associated with establishment or execution of this Program. They have also delegated to him the authority to initiate, recommend, or provide solutions for such problems to whatever management level is necessary, and to verify that effective corrective action is taken in a timely manner. The Manager, Quality Assurance, is authorized to prepare, approve and issue standard procedures prescribing a uniform company-wide method of performing an activity affecting quality when such standardization is considered desirable or essential to the effectiveness of the Quality Assurance Program. Such corporate Quality Assurance Procedures are issued to the Quality Assurance Manual, and compliance with their requirements by all Company personnel is mandatory.

The Manager of Quality Assurance is responsible to regularly assess and report on the status, adequacy, and effectiveness of the Company's Quality Assurance Program to the General Office Nuclear Plant Review and Audit Committee and other affected PGandE Management. The Manager, Quality Assurance, is responsible to identify, prepare, and submit for approval such changes to Policy Sections of this Manual as are necessary to maintain it up-to-date and in conformance with current regulatory requirements and PGandE commitments to the U.S. Nuclear Regulatory Commission. He is responsible for the technical review of all regulatory submittals as they pertain to this Program, and his concurrence is required prior to submittal. He is also responsible to establish and maintain a management system for the control of the Company's quality records related to its nuclear power plants.

The Manager, Quality Assurance, has the authority and responsibility to stop work should there be a serious breach of any part of the Quality Assurance Program prescribed by this Manual, or of technical or regulatory requirements wherein public health or safety could be involved. If stopping work would involve changing a nuclear generating unit's power level or sepa-ating such a

unit from the PGandE system, the concurrence of the Vice President, Nuclear Power Generation, is required.

One or more PROJECT MANAGERS may report to the Executive Vice President, Facilities and Electric Resources Development. Depending on the circumstances pertaining to a particular task or corporate project, the Executive Vice President may assign an individual independent of the functional organization units, such as Engineering and Construction, to act as Project Manager. In such instances, the Project Manager reports directly to the Executive Vice President, Facilities and Electric Resources Development, and in general, is responsible to him for the overall planning, coordination, and administration of the assigned work. The exact nature and scope of each Project Manager's responsibility and authority is established in writing by the Executive Vice President at the time of the Project Manager's assignment.

THE VICE PRESIDENT, FUEL RESOURCES, is responsible to the President and Chief Operating Officer for the management of all Company fuel sources and supplies. He is responsible for the procurement of fuels for the Company's electric power generation facilities, including the purchases of uranium and emergency diesel fuel for the nuclear power plants. With respect to the purchase of fuels for the Company's nuclear power plants, the Vice President's responsibility and authority is limited to the commercial and administrative aspects of such procurements. He obtains the necessary technical and quality input to such purchases from the appropriate technical groups and assures those requirements are included in the procurement documents transmitted to potential suppliers. He coordinates and participates in the bid evaluation process, and is responsible to evaluate the suppliers and their bids relative to the commercial aspects of the procurement. Subsequent to award, he is responsible for administration of the contract and serves as the primary interface point for all contacts between PGandE and the supplier. In this respect, he is responsible to coordinate and assure all PGandE postaward activities by the technical and quality groups, such as reviews, audits, and source inspections, are performed as required by the procurement documents.

Various groups and committees function at the managerial level within the Company to provide review and audit of nuclear power plant design, construction, and operation activities. The committees and groups are

identified on the Organization Chart, Figure 17.1-2, and their reporting relationships are shown.

THE PRESIDENT'S NUCLEAR ADVISORY COMMITTEE (PNAC) regularly assesses and reports to the President on the status and adequacy of the Quality Assurance Program. The Committee is responsible to advise the President on the results of reviews of quality and safety-related activities associated with the design, construction, and operation of the Company's nuclear power plants. The Committee examines the activities and reports of independent review groups and agencies such as GONPR&AC, OSRG, and the NRC and makes recommendations to the President on those items requiring his attention. PNAC is responsible for the periodic independent audit of the Quality Assurance Program and the operations and activities of the Quality Assurance Department to assess their effectiveness and compliance with requirements. The Committee annually reviews the Corporate Emergency Response Plan for adequacy and investigates or reviews other areas having nuclear safety significance as directed by the President.

PNAC membership consists of the Senior Vice President, Operations (Chairman); Executive Vice President, Facilities and Electric Resources Development; Vice President, Engineering; Vice President, General Construction; Vice President, Nuclear Power Generation; Senior Vice President and General Counsel; Manager, Safety, Health and Claims; and Manager, Quality Assurance.

THE GENERAL OFFICE NUCLEAR PLANT REVIEW AND AUDIT COMMITTEE (GONPR&AC) reports to the Executive Vice President, Facilities and Electric Resources Development. The Committee is responsible to provide independent review and audit of activities occurring during the operational phase of the Company's nuclear power facilities. The Committee performs reviews and audits in such areas as nuclear power plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, instrumentation and control, radiological safety, nondestructive testing, mechanical and electrical engineering, administrative controls, security, and quality assurance practices to independently verify that the performance of activities in these areas is satisfactory. In addition, the Committee reviews the activities of the PSRC.

GONPR&AC membership consists of the Vice President, Nuclear Power Generation (Chairman); Manager, Nuclear Plant Operations; Manager, Quality Assurance;

Diablo Canyon Project Manager; Technical Assistant to the Vice President, Nuclear Power Generation; Chief Mechanical and Nuclear Engineer (Engineering Department); and Manager, Station Construction.

THE PLANT STAFF REVIEW COMMITTEE (PSRC) reports to the Manager, Nuclear Plant Operations, and is responsible to advise the Plant Manager on matters related to nuclear safety. The committee is responsible to provide timely and continuing monitoring of operating activities to assist the Plant Manager in keeping aware of general plant conditions and to verify that day-to-day operating activities are conducted safely and in accordance with applicable administrative controls. The Committee performs reviews periodically and as situations demand, to evaluate plant operations and to plan future activities. In addition, the Committee performs special reviews, investigations or analyses, and screens subjects of special concern as requested by GONPR&AC.

Included among the Plant Staff Review Committees' responsibilities is the review of proposed changes to the facility and proposed changes to specified programs and procedures to determine if such changes involve an unreviewed safety question, as defined in 10CFR50.59. These reviews by the Plant Staff Review Committees are not intended nor required to be to the same extent or depth as to essentially duplicate the technical reviews which are required to be conducted by the originating organization. Rather, the Plant Staff Review Committee's review is required to be to the extent and depth necessary to assure that all relevant factors were appropriately considered by that originating organization.

THE ONSITE SAFETY REVIEW GROUP (OSRG) reports to the Technical Assistant to the Vice President, Nuclear Power Generation. The group is responsible to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of plant design and operating experience information which may indicate areas for improving plant safety. The OSRG is responsible to independently verify unit activities are performed correctly, that human errors are reduced as much as practical and to provide recommendations for improving unit safety.

Charters for the above committees and groups provide detailed responsibilities and functions for each committee/group as well as their membership, authority and reporting requirements.

Each General Office Department of the Company, such as Engineering, General Construction, and Nuclear Power Generation, documents and maintains current a written description of its internal organization. This documentation describes the department's structure, levels of authority, line of communication, and assignments of responsibility. Such documentation takes the form of organization charts supported by written job descriptions or other narrative material in sufficient detail that the duties and authority of each individual whose work affects quality is clear. Any personnel within the department who are assigned to formally verify by inspection, audit, or other means that work conforms to established requirements is independent of those who performed or directly supervised the work.

That individual within PGandE who has been assigned a particular responsibility in the Quality Assurance Manual (as described above) is the only person within the Company who is authorized to perform the activities necessary to discharge that responsibility. Normally, the activities related to discharging a particular responsibility will be performed either by the person who has been assigned that responsibility or by personnel who are directly subordinate to and under the control of that person. However, circumstances may arise where it is considered either necessary or desirable to have such activities, or some portion of them, actually performed by someone else. In such cases the assigning person retains responsibility. In such circumstances the detailed procedures and instructions to be followed in performing the work are reviewed and approved by the person assigned responsibility for the work per the Quality Assurance Manual prior to commencement of work. The purpose of such review and approval shall be to verify that such procedures and instructions reflect an acceptable method of performing the work and are in compliance with the requirements of the Quality Assurance Manual.

All instances are documented in which authority is to be delegated or support services are to be provided.

Suppliers to PGandE are required to conform to the PGandE Quality Assurance Program or their own program approved by PGandE and complying with the applicable documents identified in 17.3. The quality program is defined in the contract or similar procurement document. Suppliers to PGandE are required to document their internal organizational arrangements to the extent necessary for PGandE to assure the Supplier is capable of effectively managing, directing, and executing the requirements of the procurement documents. The authority and responsibility of persons and organizations who perform activities which might affect the quality of the procured items or services shall be clearly established. The Supplier's organizational structure, levels of authority, and functional assignments of responsibility shall be such that:

. The quality assurance function of formally verifying conformance to the technical and quality requirements of the procurement documents is accomplished by qualified personnel who are independent of those who performed or directly supervised the work.

. Personnel who perform quality assurance functions have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; to verify implementation of those solutions; and to control further processing of the items or services until proper dispositioning has occurred.

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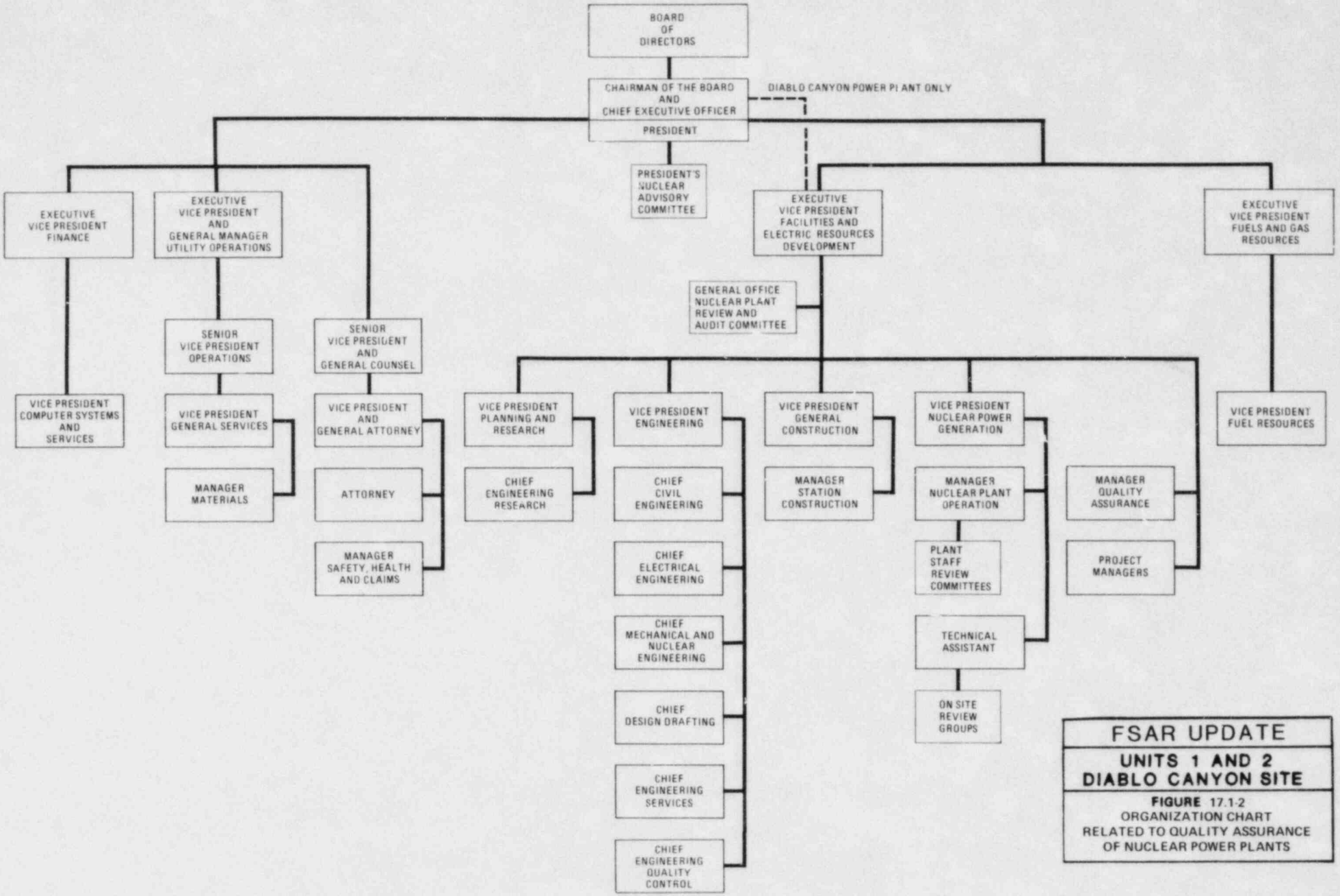

FSAR UPDATE

UNITS 1 AND 2
DIABLO CANYON SITE

FIGURE 17.1-2
ORGANIZATION CHART
RELATED TO QUALITY ASSURANCE
OF NUCLEAR POWER PLANTS

17.2 QUALITY ASSURANCE PROGRAM

The quality of the safety-related aspects of the design, construction, and operation of PGandE nuclear power plants shall be assured through the program prescribed by the Quality Assurance Manual for Nuclear Power Plants (QA Manual). The QA Manual requirements apply to:

- the design, construction, and operation of structures, systems, and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public;

- the design, construction, and operation of those portions of structures, systems, or components whose function is not required as above but whose failure could reduce the functioning of the above plant features to an unacceptable level or could incapacitate control room occupants; and

- activities affecting the above plant features.

The status and adequacy of this program shall be regularly monitored, and it shall be revised as necessary to improve its effectiveness or to reflect changing conditions. The Manager, Quality Assurance, is responsible for the preparation, issue, interpretation, and control of the Quality Assurance Manual. The Manager, Quality Assurance, is responsible to assure the requirements set forth in the QA Manual are in compliance with current regulatory requirements and PGandE commitments to the U.S. Nuclear Regulatory Commission.

The QA Manual, including any changes, supplements, or appendices, is issued and maintained as a controlled document. Proposed changes to the policy sections of the QA Manual are reviewed and concurred with in writing by the Manager,

Quality Assurance, and by PNAC prior to submission to the President and Chairman of the Board for approval. Other sections of the QA Manual require approval of the Manager, Quality Assurance only.

Changes to the policy sections that constitute a reduction in commitments from those in the current FSAR Quality Assurance Program Description shall be submitted to and approved by NRC in accordance with 10CFR50.54 prior to issue for use. The Manager, Quality Assurance, shall identify to the Vice President, Nuclear Power Generation, any changes in the QA Manual which constitute a change to the Quality Assurance Program described in a plant FSAR and request such changes be reflected in the next periodic update required by 10CFR50.71.

Implementation of the QA Manual is accomplished through separately issued procedures, instructions, and drawings. Each Vice President and Manager is responsible for the establishment and implementation of detailed procedures and instructions prescribing the activities for which he is responsible. Such documents are based on and derived from the policies, reflect the responsibilities, and meet the minimum requirements set forth in the Policy and procedures of the QA Manual. Activities affecting quality are accomplished in accordance with these instructions, procedures, and drawings; and all personnel are instructed that compliance with their requirements, and the requirements of the QA Manual, are mandatory.

Questions on disputes involving interpretation of the requirements of the QA Manual, or of the commitments and requirements upon which it is based, are referred to the Manager, Quality Assurance, for resolution. Questions or disputes involving the responsibilities defined in the policy sections of the QA Manual are referred to PNAC for resolution. Questions or disputes involving other quality matters are resolved by referring the matter in a timely manner to successively higher levels of management until, if necessary, the matter reaches that level which has direct authority over all contesting parties.

Personnel who perform functions addressed in the QA Manual are responsible for the quality of their work. They are indoctrinated, trained, and appropriately qualified to assure that they have achieved and maintained suitable proficiency to perform those functions. Qualification of such personnel is in accordance with applicable codes, standards, and regulatory requirements.

The Manager, Quality Assurance, or his designated representative, regularly reports to the responsible Plant Manager or Superintendent, GONPR&AC, and other affected PGandE management on the effectiveness of the Quality Assurance Program prescribed by the QA Manual as it relates to the operation of the Company's nuclear power plants. Such reports are based on the results of audits, inspections, tests, and other observations of activities as prescribed by the QA Manual.

PNAC annually performs, or causes to be performed, an independent audit of the overall Quality Assurance Program prescribed by the QA Manual and of the PGandE Quality Assurance Department and its activities and operations. The purpose of this audit is to evaluate the adequacy and effectiveness of the Quality Assurance Department's functions, and to verify implementation of, and compliance with current regulatory requirements and Company commitments to the U.S. Nuclear Regulatory Commission.

PNAC regularly assesses and reports to the President on the overall status, and adequacy of the Company's Quality Assurance Program for nuclear power plants. Such assessment shall include consideration of the results of their overview activities related to GONPR&AC and of the independent audit specified above. It may also include consideration of such other objective information and data as PNAC considers relevant and appropriate.

17.3 CURRENT REGULATORY REQUIREMENTS AND PGandE COMMITMENTS PERTAINING TO THE QUALITY ASSURANCE PROGRAM

The Quality Assurance Program described in the Quality Assurance Manual for Nuclear Power Plants complies with the requirements set down in the Code of Federal Regulations. In addition, it complies with the regulatory documents and industry standards listed in Table 1. Changes to this list are not made without the review and concurrence of the Quality Assurance Manager.

TABLE I

17.3 CURRENT REGULATORY REQUIREMENTS AND PGandE COMMITMENTS PERTAINING TO THE QUALITY ASSURANCE PROGRAM

Reg. Guide	Date	Standard No.	Rev.	Title/Subject	Comments/Reservations
(S.G.) 28	6/72	ANSI N45.2	1971	Quality Assurance Program Requirements for Nuclear Power Plants	
1.37	3/73	ANSI N45.2.1	1973	Quality Assurance Requirements for Cleaning Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants	
1.38	5/77	ANSI N45.2.2	1972	Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants	
1.39	9/77	ANSI N45.2.3	1973	Housekeeping Requirements for Water-Cooled Nuclear Power Plants	
1.30	8/72	ANSI N45.2.4	1972	Quality Assurance Requirements for the Installation, Inspection, and Testing of Instrumentation and Electric Equipment	
1.94	4/76	ANSI N45.2.5	1974	Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants	
1.29	9/78	--	--	Seismic Design Classification	

TABLE I

17.3 CURRENT REGULATORY REQUIREMENTS AND PGandE COMMITMENTS PERTAINING TO THE QUALITY ASSURANCE PROGRAM

Reg. Guide	Date	Standard No.	Rev.	Title/Subject	Comments/Reservations
1.58	9/80	ANSI N45.2.6	1978	Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel	ANSI N45.2.6 applies to individuals conducting independent QC inspections, examinations, and tests. ANSI N18.1 applies to personnel conducting inspections and tests of items or activities for which they are responsible (e.g., plant surveillance test maintenance tests, etc).
1.116	5/77	ANSI N45.2.8	1975	Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems	
1.88	10/76	ANSI N45.2.9	1974	Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records	Except we will comply with the two-hour rating of Section 5.6 of ANSI N45.2.9 issued July 15, 1979.
1.74	2/74	ANSI N45.2.10	1973	Quality Assurance Terms and Definitions	
1.64	6/76	ANSI N45.2.11	1974	Quality Assurance Requirements for the Design of Nuclear Power Plants	
1.144	1/79	ANSI N45.2.12	1977	Auditing of Quality Assurance Program for Nuclear Power Plants	

17.0 QUALITY ASSURANCE

TABLE I

17.3 CURRENT REGULATORY REQUIREMENTS AND PG&E COMMITMENTS PERTAINING TO THE QUALITY ASSURANCE PROGRAM

Reg. Guide	Date	Standard No.	Rev.	Title/Subject	Comments/Reservations
1.123	7/77	ANSI N45.2.13	1976	Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants	
1.146	8/80	ANSI N45.2.23	1978	Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants	
1.33	2/78	ANSI N18.7	1976	Quality Assurance Program Requirements (Operation)	
1.8	9/75	ANSI N18.1	1971	Personnel Selection and Training	
	2/79	ANSI/ANS 3.1	1979	Personnel Selection and Training	Within three years of commercial operation
4.15	12/77	--	--	Quality Assurance for Radiological Monitoring Programs (Normal Operations) - Effluent Streams and the Environment	
BTP APCSB 9.5-1	5/76	--	--	Guidlines for Fire Protection for Nuclear Power Plants	
1.26	2/76	--	--	Quality Group Classifications and Standards for Water, Steam, and Radioactive Waste Containing Components of Nuclear Power Plants	Design and construction of Diablo Canyon Power Plant started in 1965 and most of the work cannot comply with the specific requirements of Regulatory Guide 1.26, February 1976. The intent of the Reg. Guide has been followed as shown by comparing the Reg. Guide with Tables 3.2-2 and 3.2-3 in the FSAR.