The Light company
Houston Lighting & Power South Texas Project Electric Generating Station P. O. Box 289 Wadsworth, Texas 77483

March 28, 1996
ST-HL-AE-5321
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10CFR50.54

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
Submittal of Revised Operations Quality Assurance Plan

In accordance with 10CFR50.54(a), the South Texas Project submits the attached revision of the South Texas Project Operations Quality Assurance Plan (Attachment 1). This revision incorporates the methodology for implementation of the South Texas Project's Graded Quality Assurance Program.

The enhancements made to the Operations Quality Assurance Plan represent an overall improvement to the Quality Assurance Program. While the changes made to the plan in this revision may result in the reduction in the application of certain commitments, the changes as a whole do not result in a reduction in commitment and serve to improve the overall safety of the plant. In addition, the South Texas Project has reviewed the revision and has determined that there are no unreviewed safety questions.

The South Texas Project has begun the process necessary to implement this revision and believes that the initial implementation of selected portions on selected systems could occur as early as August 1996. The time between now and August will provide the Nuclear Regulatory Commission with the opportunity to continue the review and assessment of the Graded Quality Assurance Program at South Texas Project as it is developed.

We believe that this submittal with it attachments continues to support the process outlined in the Nuclear Regulatory Commission's January 24, 1996 letter to us regarding the Graded Quality Assurance Initiative. In particular we are addressing the four essential elements of the Graded Quality Assurance Program as follows:

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1. Our process to identify the appropriate safety significance of structures, systems and components is covered by the following:

   A. The process used to establish and provide guidance to the Expert Panel and associated Working Groups on the implementation of a risk informed, performance based Comprehensive Risk Management Program is described in the procedure titled "Comprehensive Risk Management" (Attachment 2).

   B. The process used to rank the risk significance of systems, components, and operator actions within the scope of the Probabilistic Safety Assessment is described in the procedure titled "Probabilistic Safety Assessment Risk Ranking" (Attachment 3).

   C. The process used to define the structure, functions, controls and applications of the Probabilistic Safety Assessment Program is described in the procedure titled "Probabilistic Safety Assessment Program" (Attachment 4).

   D. The process used to define, disposition, implement and maintain the data inputs to the Probabilistic Safety Assessment risk models is described in the procedure titled "Configuration Control of the Probabilistic Safety Assessment" (Attachment 5).

2. The implementation of appropriate Quality Assurance controls based on safety function and significance at the program level are covered in the Operations Quality Assurance Plan (Attachment 1).

3. Our process for root cause analysis and corrective action is our station Corrective Action Program (0PGP03-ZX-0002) that is used to ensure our compliance with 10CFR50 Appendix B Criterion XVI (not attached).

4. Our means for reassessing safety significance and Quality Assurance controls is covered in our procedure titled "Station Performance Data Collection, Categorization, and Reporting" (Attachment 6). The data which results from this process is reincorporated into item 1 above.

The above procedures are submitted for the Nuclear Regulatory Commission's information and review as agreed upon in our December 1995 meeting. These procedures are implementation documents for our Graded Quality Assurance Program and will be finalized as part of the implementation process. We do not plan to maintain current copies of the procedures on the docket.

We have implemented our Expert Panel and Graded Quality Assurance Working Group. At this time, the Working Group is being trained and beginning development of their processes and methodologies. Following these activities they will select the pilot systems and begin the grading process. We believe the best opportunities for the Nuclear Regulatory Commission to review and assess the South Texas Project Graded Quality Assurance Process will occur as the Working Group proceeds through these steps. Therefore, we have included a copy of the Working Group's current schedule of activities (Attachment 7) and invite the Nuclear Regulatory Commission to attend any of the sessions considered beneficial. The schedule is subject to change, so close coordination with the Working Group Chairman will be appropriate.

As agreed upon in our December 1995 meeting, a copy of the current Expert Panel Charter, a list of current Expert Panel members and a list of the current members of the Working Group are attached for information (Attachment 8). Resumes for the Expert Panel members are available on site for review by the Nuclear Regulatory Commission.

If there are any questions regarding this submittal, please contact Mr. Lawrence Martin at (512) 972-8686 or me at (512) 972-8434.

W. T. Cottle
Executive Vice President and
General Manager, Nuclear

JMP/lf

Attachments:
1. Revision to the Operations Quality Assurance Plan
2. Comprehensive Risk Management Procedure - DRAFT
3. Probabilistic Safety Assessment Risk Ranking Procedure- DRAFT
4. Probabilistic Safety Assessment Program Procedure- DRAFT
5. Configuration Control of the Probabilistic Safety Assessment Procedure - DRAFT
6. Station Performance Data Collection, Categorization, and Reporting Procedure - DRAFT
7. Working Group's current schedule of activities
8. Expert Panel Charter, Expert Panel Members List and Working Group Members List

c:

Leonard J. Callan
Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Thomas W. Alexion
Project Manager
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001 13H15

David P. Loveless
Sr. Resident Inspector
c/o U. S. Nuclear Regulatory Comm.
P. O. Box 910
Bay City, TX 77404-0910

J. R. Newman, Esquire
Morgan, Lewis & Bockius
1800 M Street, N.W.
Washington, DC 20036-5869

K. J. Fiedler/M. T. Hardt
City Public Service
P. O. Box 1771
San Antonio, TX 78296

J. C. Lanier/M. B. Lee
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Central Power and Light Company
ATTN: G. E. Vaughn/C. A. Johnson
P. O. Box 289, Mail Code: N5012
Wadsworth, TX 77483

Rufus S. Scott
Associate General Counsel
Houston Lighting & Power Company
P. O. Box 61067
Houston, TX 77208

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Dr. Joseph M. Hendrie
50 Bellport Lane
Bellport, NY 11713

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

U. S. Nuclear Regulatory Comm.
Attn: Document Control Desk
Washington, D. C. 20555-0001

J. R. Egan, Esquire
Egan & Associates, P.C.
2300 N Street, N.W.
Washington, D.C. 20037

J. W. Beck
Little Harbor Consultants, Inc.
44 Nichols Road
Cohassett, MA 02025-1166

ATTACHMENT 1

OPERATIONS QUALITY ASSURANCE PLAN

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
APPROVAL	Rev. No.	CHANGE	REVISION 11 TO **12**
APPROVAL	Eff. Date	CHANGE	12-30-94 to **08-01-96**
TOC	HEADER	CHANGE	REVISION 11 TO **12**
	HEADER	CHANGE	PAGE 1 OF 2 TO **PAGE 1 OF 1**
	HEADER	REPLACE	EFFECTIVE DATE 12-30-94 WITH **08-01-96**
TOC-PG 1	CENTER	DELETE	**Chapters Requiring NRC Approval**
	Definitions	CHANGE	Effective Chapter Revision from 5 to **6**
	Definitions	REPLACE	Effective Revision Date 12-21-90 with **08-01-96**
	CH. 1.0	CHANGE	Effective Chapter Revision from 7 to **8**
	CH. 1.0	REPLACE	Effective Revision Date 12-30-94 with **08-01-96**
	CH. 1.0	DELETE	Change Notice Nos. **QA-024** and **QA-025**
	CH. 2.0	CHANGE	Effective Chapter Revision from 9 to **10**
	CH. 2.0	REPLACE	Effective Revision Date 12-30-94 with **08-01-96**
	CH. 2.0	DELETE	Change Notice No. **QA-025**
	CH. 3.0	CHANGE	Effective Chapter Revision from 6 to **7**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	CH. 3.0	REPLACE	Effective Revision Date 12-20-91 with **08-01-96**
	CH. 4.0	CHANGE	Effective Chapter Revision from 5 to **6**
	CH. 4.0	REPLACE	Effective Revision Date 12-30-94 with **08-01-96**
	CH. 5.0	CHANGE	Effective Chapter Revision from 4 to **5**
	CH. 5.0	REPLACE	Effective Revision Date 12-21-90 with **08-01-96**
	CH. 6.0	CHANGE	Effective Chapter Revision from 6 to **7**
	CH. 6.0	REPLACE	Effective Revision Date 12-18-92 with **08-01-96**
	CH. 7.0	CHANGE	Effective Chapter Revision from 6 to **7**
	CH. 7.0	REPLACE	Effective Revision Date 12-30-94 with **08-01-96**
	CH. 8.0	CHANGE	Effective Chapter Revision from 4 to **5**
	CH. 8.0	REPLACE	Effective Revision Date 12-21-90 with **08-01-96**
	CH. 8.0	DELETE	Change Notice No. **QA-026**
	CH. 9.0	CHANGE	Effective Chapter Revision from 5 to **6**
	CH. 9.0	REPLACE	Effective Revision Date 12-20-91 with **08-01-96**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	CH. 10.0	CHANGE	Effective Chapter Revision from 6 to **7**
	CH. 10.0	REPLACE	Effective Revision Date 12-21-90 with **08-01-96**
	CH. 11.0	CHANGE	Effective Chapter Revision from 5 to **6**
	CH. 11.0	REPLACE	Effective Revision Date 12-21-90 with **08-01-96**
	CH. 12.0	CHANGE	Effective Chapter Revision from 5 to **6**
	CH. 12.0	REPLACE	Effective Revision Date 12-21-90 with **08-01-96**
	CH. 13.0	CHANGE	Effective Chapter Revision from 6 to **7**
	CH. 13.0	REPLACE	Effective Revision Date 12-30-94 with **08-01-96**
	CH. 13.0	DELETE	Change Notice No. **QA-025**
	CH. 14.0	CHANGE	Effective Chapter Revision from 4 to **5**
	CH. 14.0	REPLACE	Effective Revision Date 12-21-90 with **08-01-96**
	CH. 15.0	DELETE	Title - "Quality Assurance **Audit and Surveillance**"
	CH. 15.0	INSERT	Title - "Quality Assurance **Overview Activities**"
	CH. 15.0	CHANGE	Effective Chapter Revision from 5 to **6**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	CH. 15.0	REPLACE	Effective Revision Date 12-30-94 with **08-01-96**
	CH. 15.0	DELETE	Change Notice No. **QA-025**
TOC-PG 2	ALL	DELETE	**ENTIRE PAGE**
DEFINIT		INSERT	**Assessment/Evaluation - Systematic examination of plant systems/components, various plant activities or incidents to evaluate the effectiveness of work practices and/or management controls (i.e., self-assessments, independent assessments, and combinations of the two).**
DEFINIT	AUDIT	INSERT	At the end of the definition, insert: **An audit may include performance monitoring as an input to satisfy a specific portion or aspect of an audit, but should not totally replace an audit.**
DEFINIT		INSERT	**Review - A deliberately critical examination, including observation of plant operation, evaluation of audit results, procedures, certain contrmplated actions, and after-the-fact investigations of abnormal conditions.**
DEFINIT	Surveillance	INSERT	**/Quality Performance Monitoring**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
CH. 1.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full", "Targeted", or "Basic".**
	5.1	DELETE	**Group Vice President, Nuclear**
	5.1	INSERT	**Executive Vice President and General Manager, Nuclear**
	5.1.1	DELETE	**Group Vice President, Nuclear**
	5.1.1	INSERT	**Executive Vice President and General Manager, Nuclear**
	5.1.2.1	DELETE	**Manager, Nuclear Security**
	5.1.2.1	INSERT	**Manager, Nuclear Plant Protection**
	5.1.4	DELETE	**The NA&L organization's quality responsibilities during operation are shown in Attachment II.**
	5.1.4	DELETE	**Group Vice President, Nuclear**
	5.1.4	INSERT	**Executive Vice President and General Manager, Nuclear**
	5.1.4.2	DELETE	**Group Vice President, Nuclear**
	5.1.4.2	INSERT	**Executive Vice President and General Manager, Nuclear**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.1.4.4	DELETE	**Group Vice President, Nuclear**
	5.1.4.4	INSERT	**Executive Vice President and General Manager, Nuclear**
	5.1.5.1	DELETE	**Manager, Records Management and Administration** and **Director,** Nuclear Information Systems
	5.1.5.1	INSERT	**Manager, Planning and Controls;** and **Manager,** Nuclear Information Systems
	5.1.6	DELETE	**and Access** and **personnel access authorization for the protected and vital areas of STPEGS.**
	5.1.6	INSERT	**Nuclear** and ... applicable to **employee relations (i.e., access authorization), employee development and organizational effectiveness, salary/compensation, and legal and personnel services.**
	5.1.6.1	DELETE	**Access Authorization reports** and **and Access**
	5.1.6.1	INSERT	The Manager, **Employee Relations; Manager, Employee Development & Organizational Effectiveness; Supervisor, Salary/Compensation; and Supervisor, Legal & Personnel Services report to ...Nuclear.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.1.7	INSERT	**The Director, Nuclear Safety and Quality Concerns Program (NSQP) is responsible for implementing quality program requirements applicable the NSQP.**
	8.1	DELETE	**Nuclear Group - QA Functions**
	8.1	INSERT	**Nuclear Group Organization**
	8.2	DELETE	**Entirely**
	Att. I	CHANGES	Make the appropriate changes to the Organization Chart to reflect the above noted changes.
	Att. II	DELETE	**Delete entire Attachment**
CH. 2.0	**Unless noted otherwise, the sections for Chapter 2.0 have been completely replaced as noted. Sections that are not specified have remained as shown in the previous revision. The "header" for each page has been changed to reflect the new revision number and effective date.**		
	2.1	INSERT	**The QA Program is implemented and controlled in accordance with the Operations Quality Assurance Plan (OQAP) and is applicable to structures, systems components, and activities to an extent consistent with their importance to safety, and complies with the requirements of 10CFR50, Appendix B and other program commitments as appropriate.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			Graded Quality Assurance is one element of STP's Comprehensive Risk Management (CRM) Program. Graded Quality Assurance provides the process by which risk-based methodology [i.e., Probabilistic Safety Assessment (PSA)] and performance-based information analyses are combined to provide direction as to what levels of programmatic controls are needed for systems, components or activities, and as to the levels of first line and independent oversight needed to provide necessary assurance that items will operate safely and activities are accomplished as prescribed. The CRM Program is implemented by Working Groups who provide risk-informed, performance-based recommendations to an Expert Panel. The Expert Panel is a multi-discipline group comprised of high-level management representing Design and Systems Engineering, Nuclear Licensing, Industry Relations, Risk and Reliability Analysis, Quality, and Plant Management. The Expert Panel is chartered with guiding the implementation of the CRM Program.

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			The QA Program is implemented in a "graded" manner, and is comprised of two separate and distinct programs, which are implemented in three graded applications (i.e., "Full", "Targeted", and "Basic"). Part A of the OQAP represents the program implementation requirements for both "Full" and "Targeted" application. Part B of the OQAP represents the program implementation requirements for "Basic" application. **"Full" program controls are applied for items and activities determined to be "high" safety significant/risk important.** **"Targeted" program controls are applied for items and activities which, while not being "high" safety significant/risk important, are determined to be significant/important for other reasons. "Full" program controls will be applied in a selected manner and specifically "Targeted" at those characteristics/attributes of the item or activity which render it significant or important.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			"Basic" program controls are applied for items and activities which, while not being "high" safety significant/risk important or significant/important for other reasons, are nevertheless subject to the controls of 10CFR50, Appendix B.
			NOTE: An analysis of items and activities to determine which level of program controls are appropriate must be completed prior to designation as "Targeted" or "Basic". Until these analyses are complete, "Full" progam controls will be applied across the board.
	2.2	INSERT	**The QA Program will also extend, as applicable and/or determined by STP management, to programs including 10CFR71, Subpart H (except design and fabrication of NRC certified radioactive waste shipping casks), ASME Boiler and Pressure Vessel Code, Sections III and XI, Fire Protection Program, Emergency Plan, Radiological Environmental Monitoring Program, Radwaste Management Program, Computer Program Verification and Control, Seismic and Environmental Equipment Qualification Programs,**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			Radiation Protection Program, and Station Blackout (SBO) systems and equipment.
	3.1	INSERT	Full program controls - The highest levels of program contrcls and oversight that are to be afforded to items and activities. These are in full compliance with the requirements of 10CFR50, Appendix B, and additionally represent compliance with the applicable STP UFSAR commitments relative to USNRC Regulatory Guides and ANSI Standards which they endorse. These controls provide the highest levels of program controls and line/independent oversight and are designed to provide a high degree of assurance that items perform safely and activities are accomplished as expected.
	3.2	INSERT	Targeted program controls - A level of program controls and oversight applied to items and activities which, while not being "high" safety significant/risk important, are nevertheless significant/important for other reasons. These controls are selected elements of the "Full" program which are specifically applied to those characteristics/attributes of items or activities which

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CHAPTER	LOCATION	ACTION	TEXT
			render them significant/important. These controls provide a high degree of assurance that the items will perform their specific function and the important elements of the activities are accomplished as expected.
	3.3	INSERT	**Basic program controls - Program controls applied to items and activities which, while not being "high" safety significant/risk important or significant/important for other reasons, are nevertheless subject to the controls of 10CFR50 Appendix B. These controls are defined as good business practices which reflect the most economical and efficient means of conducting business and are designed to provide assurance that items perform, and activities are accomplished, as expected. They do not necessarily reflect the highly prescriptive, strict controls as depicted in USNRC Regulatory Guides and the ANSI standards they endorse.**
	4.4	INSERT	**Part A,**
	4.6	INSERT	**UFSAR Table 3.12-1**
	5.1	INSERT	**The OQAP is prepared to prescribe the STPEGS QA Program.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.1.1	INSERT	**The OQAP shall provide quality program policies to be implemented for the STPEGS. The OQAP assigns responsibilities necessary for the attainment of quality assurance objectives and the verification of conformance to established requirements.**
	5.1.2	INSERT	**The QA Program shall be in effect throughout the operating life of the STPEGS.**
	5.1.3	INSERT	**The Executive Vice President and General Manager, Nuclear has overall responsibility for quality assurance.**
	5.1.4	INSERT	**The General Manager, Nuclear Assurance and Licensing (NA&L), is responsible for the development of the OQAP.**
	5.2	INSERT	**Organizational Independence**
	5.2.1	INSERT	**The reporting arrangement utilized by the NA&L Organization ensures that those personnel performing independent assessments have the organizational freedom to:**
	5.2.1.1	INSERT	**Identify quality problems.**
	5.2.1.2	INSERT	**Initiate, recommend, or provide solutions.**
	5.2.1.3	INSERT	**Verify implementation of solutions.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.2.2	INSERT	**Personnel verifying compliance with quality requirements do not have direct responsibility for the performance of that work.**
	5.3	INSERT	**QA Program**
	5.3.1	INSERT	**The operations phase of the STPEGS includes testing, operation, maintenance, refueling, inservice inspection, and modification. The OQAP requires that HL&P, its contractors, subcontractors, and vendors comply with the criteria established by 10CFR50, Section 50.55a; 10CFR50, Appendix A, General Design Criterion (GDC) 1; 10CFR50, Appendix B, and 10CFR71, Sub-Part H.** **It is the intent of HL&P to comply, as applicable, with the applicable American National Standards Institute (ANSI) N45.2 daughter standards, ANSI N18.7, and implementing Regulatory Guides (RG) as defined herein and in Updated Final Safety Analysis Report (UFSAR) Table 3.12-1.**
	5.4	INSERT	**Delegation of QA Functions**
	5.4.1	INSERT	**The OQAP may be executed in whole or part by subcontract personnel. However, STPEGS**

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CHAPTER	LOCATION	ACTION	TEXT
			will retain responsibility for the total quality assurance program, and NA&L personnel will perform appropriate assessment activities of any subcontracted activities.
	5.5	INSERT	**Identification of Safety Significant Systems, Components, and Activities**
	5.5.1	INSERT	**The program described herein is applied to activities affecting the safety functions of those structures, systems, and components which prevent, or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The structures, systems, and components controlled are listed in UFSAR Section 3.2, along with their associated fire protection systems. UFSAR Section 3.2 also identifies those structures, systems, and components which may not represent a safety significant/risk important concern but to which the STPEGS OQAP, Part B is applied.**
	5.5.2	INSERT	**The fire protection QA Program is part of the overall STPEGS Operations QA Program and is therefore under the management control of QA. Fire**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			protection QA Program criteria are being implemented as part of the HL&P Operations QA Program, as defined in this OQAP.
	5.5.3	INSERT	**Expendable or consumable items necessary for the functional performance of structures, systems, and components are subjected to quality assurance requirements as specified in written procedures. These procedures include provisions for review and control in accordance with industry standards and specifications.**
	5.6	INSERT	**QA Program Documents**
	5.6.1	INSERT	**The QA Program shall be implemented with documented instructions, procedures, and drawings which include appropriate quantitative and qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. Procedures shall include the control of the sequence of required inspections, tests, and other operations when important to quality. To change these controls, the individual procedure must be changed and shall require the same level of review and approval given to the original procedure.**

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CHAPTER	LOCATION	ACTION	TEXT
			Such instructions, procedures, and drawings are reviewed and approved for compliance with requirements appropriate to their safety significance by individuals qualified to do so.
	5.7	INSERT	Personnel Indoctrination and Training
	5.7.1	INSERT	General indoctrination and training programs shall be provided for site personnel to assure that they are knowledgeable regarding quality programs and requirements. The training requirements for STPEGS personnel are described in UFSAR Section 13.2. Personnel performing complex, unusual, or potentially hazardous work shall be instructed in special indoctrination or briefing sessions. Emphasis shall be on special requirements for safety of personnel, radiation control and protection, unique features of equipment and systems, operating constraints, and control requirements in effect during performance of work. Where required by codes and standards, personnel are trained, qualified, and certified according to written procedures in the principles and techniques of performing

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			specific activities.
	5.8	INSERT	**Policies and Goals**
	5.8.1	INSERT	**It is the policy of HL&P, acting as licensee and Project Manager for the STPEGS, to assure that the design, procurement, construction, testing, and operation of the STPEGS are in conformance with specifications, procedures, codes, commitments and Nuclear Regulatory Commission (NRC) regulations. The responsibility of each organization supporting the STPEGS is to ensure that the requirements stated in this QA Program are incorporated into procedures. Adherence to those procedures is mandatory for all STPEGS organizations and contractors or vendors providing items or services covered by the QA Program.**
	5.8.2	INSERT	**The OQAP identifies activities and establishes requirements for procedures which identify, report, and verify the resolution of quality problems. The implementing procedures call for the resolution of quality problems at the lowest possible authorized level. However, if a dispute is encountered in the resolution of a quality problem which cannot be**

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CHAPTER	LOCATION	ACTION	TEXT
			resolved at lower levels, the General Manager, Nuclear Assurance & Licensing or Director, Quality shall present the problem to the Executive Vice President and General Manager, Nuclear for resolution.
	5.9	INSERT	**Control of Activities**
	5.9.1	INSERT	**The OQAP requires Quality department review and/or approval of procedures which control selected activities. These procedures shall require the use of the proper equipment, completion of prerequisites for starting an activity, and suitable environment for performing the activity. Procedures will comply with the appropriate standards.**
	5.9.2	INSERT	**STPEGS personnel attend planning, scheduling, and status meetings as necessary to assure adequate quality coverage and program application exists.**
	5.10	INSERT	**Management Review**
	5.10.1	INSERT	**The implementation of both line and OQAP requirements shall be verified through independent overview activities. The Quality**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			organization shall conduct independent overview activities of the operating plant and of the interfacing organizations' activities.
	5.10.2	INSERT	**Assessments of HL&P's implementation of the OQAP are conducted under the cognizance of the Nuclear Safety Review Board and results are transmitted to the Executive Vice President and General Manager, Nuclear for review and/or action.**
	5.10.3	INSERT	**STPEGS may use the services of architect-engineer firms, Nuclear Steam Supply System (NSSS) suppliers, fuel fabricators, constructors, and others which provide or augment STPEGS efforts during operations. The QA programs of such contractors or consultants shall be subject to review, evaluation, and acceptance by the Quality organization before initiation of activities affected by the program.**
	5.11	INSERT	**Operations Quality Assurance Plan Changes**
	5.11.1	INSERT	**HL&P is committed to maintaining the OQAP as an effective and meaningful document to provide programmatic direction on**

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CHAPTER	LOCATION	ACTION	TEXT
			STPEGS. Changes to the OQAP will be processed under 10CFR50.54(a).
	5.12	INSERT	**Computer Code Programs**
	5.12.1	INSERT	**The development, control, and use of computer code programs will be controlled. Prior to use of a computer code program, the appropriateness of the program shall be verified. In addition, all such programs shall be appropriately certified for use.**
	7.1	DELETE	**Attachment I - OQAP - 10CFR50, Appendix, B Matrix**
	7.1	INSERT	**None**
	ATT. I	DELETE	**Delete the attachment**
CH. 3.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	2.1	DELETE	**This chapter applies to all personnel engaged in quality-related activities associated with the operation of the STPEGS.**
	2.1	INSERT	**This chapter applies to all personnel performing activities associated with structures, systems, and components during the operations phase of the STPEGS.**

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CHAPTER	LOCATION	ACTION	TEXT
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.2	DELETE	**Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)**
	4.2	INSERT	**UFSAR Table 3.12-1**
	4.4	INSERT	**Part A,**
	5.1	DELETE	**quality-related**
	5.2.1	INSERT	Add the following as the last sentence of the paragraph: **These shall not be used in lieu of, or to modify existing procedures.**
	5.2.2	INSERT	Add the following as the last sentence of the paragraph: **These shall not be used in lieu of, or to modify existing procedure.**
CH. 4.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	1.1	DELETE	**quality-related**
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.1	DELETE	**Regulatory Guide 1.8, Personnel Selection and Training**

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CHAPTER	LOCATION	ACTION	TEXT
	4.1	INSERT	**UFSAR Table 3.12-1**
	4.2	DELETE	**Regulatory Guide 1.58, Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel**
	4.2	INSERT	**SNT-TC-1A, Personnel Qualification and Certification in Nondestructive Testing**
	4.3	DELETE	**Regulatory Guide 1.146, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plant**
	4.3	INSERT	**10CFR55 Operator's Licenses**
	4.4	DELETE	**SNT-TC-1A, Recommended Practice for Nondestructive Personnel Qualification and Certification**
	4.4	INSERT	**ASME Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components**
	4.5	DELETE	**10CFR55 Operator's Licenses**
	4.5	INSERT	**Part A, OQAP Chapter 14.0, Records Control**
	4.6	DELETE	**ASME Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	4.6	INSERT	**INPO ACAD 92-004, Guidelines for the Conduct of Training and Qualification Activities**
	4.7	DELETE	**OQAP Chapter 14.0, Records Control**
	4.8	DELETE	**INPO ACAD 92-004, Guidelines for the Conduct of Training and Qualification Activities**
	5.1.1	CHANGE	**Reference 4.1, 4.2, 4.3, 4.4, 4.5, and 4.6 to Reference 4.1, 4.2, 4.3, 4.4.**
	5.1.2.2	CHANGE	**i.e. to e.g.**
	5.3.1	CHANGE	**4.5 to 4.3**
	5.3.2	CHANGE	**4.2 to 4.1**
	5.3.3	CHANGE	**4.4 and 4.6 to 4.2 and 4.4**
	5.3.4	CHANGE	**4.3 to 4.1**
	5.7	DELETE	**quality-related**
	6.1	CHANGE	**4.7 to 4.5**
CH. 5.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	1.1	DELETE	**quality-related**
	2.1	INSERT	**, of structures, systems, and components subject to the controls of the OQAP.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.1	DELETE	**Regulatory Guide 1.33, Quality Assurance Program Requirements (Operations)**
	4.1	INSERT	**UFSAR Table 3.12-1**
	4.2	INSERT	**Part A,**
	4.3	INSERT	**Part A,**
	4.4	INSERT	**Part A,**
	4.5	INSERT	**Part A,**
	4.6	INSERT	**Part A,**
	4.7	INSERT	**Part A, OQAP Chapter 13.0, Deficiency Control**
	5.2.1	DELETE	**and experience with comparable equipment. It will be revised and updated as operating experience is gained.**
	5.2.1	INSERT	**and equipment performance experience.**
	5.3.1	DELETE	**The cause of malfunctions shall be promptly determined, evaluated, and recorded.**
	5.3.1	INSERT	**Equipment failures, malfunctions and degradation shall be remedied in accordance with Reference 4.7.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			This shall include determination of root cause and implementation of recurrence controls, as appropriate.
	5.3.3	DELETE	**Where unproven reliability of a new or repaired component which could affect nuclear safety exists, consideration should be given to an augmented testing and inspection program until a suitable level of performance has been demonstrated.**
	5.3.3	INSERT	**Consideration should be given to an augmented testing and inspection program following a large scale component replacement (or repair) until a suitable level of performance has been demonstrated.**
	5.5.1	DELETE	**as qualified by Nuclear Generation, Nuclear Engineering, or Nuclear Assurance, as applicable.**
	5.5.1.2	INSERT	At the end of the third sentence: **, or if not covered, the qualification requirements shall be defined.**
	5.5.1.3	DELETE	**The necessary qualification of personnel, procedures, or equipment shall be uniquely defined:**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			For special processes not covered by existing codes or standards, or **Where an item's quality requirements exceed the requirements of established codes and standards.**
	5.5.1.4	CHANGE	Renumber to **5.5.1.3. Records** are to **Records shall be**
	5.5.1.5	CHANGE	Renumber to **5.5.1.4**
	5.5.2.1	DELETE	At the end of the last sentence: **engineering organization.**
	5.5.2.1	INSERT	At the end of the last sentence: **site organization.**
CH. 6.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	1.1	DELETE	**The purpose of this chapter is to establish the requirements and responsibilities for design control of new structures, systems or components, and modification control of existing structures, systems, or componentes at the South Texas Project Electric Generating Station (STPEGS).**
	1.1	INSERT	**The purpose of this chapter is to establish the requirements and responsibilities for design and modification**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			control of structures, systems, or components at the South Texas Project Electric Generating Station (STPEGS).
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.2	INSERT	**Part A,**
	4.3	INSERT	**Part A,**
	4.5	INSERT	**Part A, OQAP Chapter 13.0, Deficiency Control**
	4.6	INSERT	**Part A, OQAP Chapter 2.0, Program Description**
	4.7	INSERT	**UFSAR Table 3.12-1**
	5.2.4	DELETE	**quality-related** (two places)
	5.4.1	DELETE	First sentence, delete the word **design** used before the word verification
	5.4.1	INSERT	At the end of the second sentence...**methods.**
	5.4.3	DELETE	**However, the supervisor may perform the verification if the supervisor is the only technically qualified individual and the need for the supervisor to perform the review is approved and documented in advance by the supervisor's management.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.5	DELETE	**Design documents include design drawings and specifications, vendor documents, setpoints with tolerances and design limits.**
	5.7	DELETE	**Errors and deficiencies found in approved design documents, including design methods, that could adversely affect quality-related structures, systems, or components shall be documented and action taken to correct and prevent the recurrence of deficiencies.**
	5.7	INSERT	**Errors and deficiencies found in approved design documents, including design methods, that could adversely affect structures, systems, or components shall be documented and action taken to correct and prevent the recurrence of deficiencies, in accordance with Reference 4.5.**
	5.9	DELETE	**Measures shall be established which assure that maintenance and modifications associated with design changes which may affect the functioning of quality-related structures, systems, or components are performed in a manner to ensure quality at least equivalent to that specified in the UFSAR or other original design bases and requirements.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.9	INSERT	**Measures shall be established which assure that maintenance and modifications associated with design changes which may affect the functioning of structures, systems, or components are performed in a manner to ensure quality at least equivalent to that specified in the UFSAR or original design bases and requirements, unless changed by GQA categorization.**
	5.10	DELETE	**quality-related**
	5.12.1	DELETE	**quality-related**
	5.12.3	DELETE	**Quality-related**
CH. 7.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	2.1	DELETE	**This chapter applies to the procurement of quality-related items and services, and commercial items procured for dedication and use in a nuclear safety-related application.**
	2.1	INSERT	**This chapter applies to the procurement of items and services for use in a nuclear "safety-related" application.**
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	4.3	DELETE	**ANSI N45.2.12/Reg. Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants**
	4.3	INSERT	**UFSAR, Table 3.12-1**
	4.4	DELETE	**ANSI N45.2.13/Reg. Guide 1.123, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants**
	4.4	INSERT	**EPRI NP-5652 (NCIG-07), Guideline for the Utilization of Commercial Grade Items in Nuclear Safety Related Application**
	4.5	DELETE	**ANSI N45.2.2/Reg.Guide 1.138, Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants**
	4.5	INSERT	**Part A, OQAP Chapter 4.0, Qualification, Training and Certification of Personnel**
	4.6	DELETE	**ANSI N18.7/Reg. Guide 1.33, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants**
	4.6	INSERT	**Part A, OQAP Chapter 13.0, Deficiency Control**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	4.7	DELETE	**EPRI NP-5652 (NCIG-07), Guideline for the Utilization of Commercial Grade Items in Nuclear Safety Related Application**
	4.7	INSERT	**Part A, OQAP Chapter 14.0, Records Control**
	4.8	DELETE	**OQAP Chapter 4.0, Qualification, Training and Certification of Personnel**
	4.9	DELETE	**OQAP Chapter 13.0, Deficiency Control**
	4.10	DELETE	**OQAP Chapter 14.0, Records Control**
	5.1.1	DELETE	**quality-related** and **changes to**
	5.1.1	INSERT	In the third sentence directly following Design Engineering **/Nuclear Purchasing & Material Management**
	5.1.2.1	DELETE	First bulleted item: **quality-related** and **, Commercial Grade Items (CGI).**
	5.1.2.1	DELETE	Third bulleted item: **Purchase requisitions for quality-related materials, parts, components, services, or CGIs...**
	5.1.2.1	INSERT	**Purchase requisitions for materials, parts, components, or services**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.1.2.1	CHANGE	Separate the second paragraph of the third bulleted item and make a fourth bulleted item, beginning with **The reviews....**
	5.1.2.1	REPLACE	In the new fourth bulleted item, replace **QA** with **Quality**
	5.1.2.2	CHANGE	In the second bulleted item: change **Purchase Requisitions** to **purchase requisitions**
	5.1.2.3	DELETE	**Additions, modifications, exceptions, and other**
	5.1.2.3	CHANGE	Change the word **changes** to upper case **Changes**
	5.1.3	INSERT	At the end of the first sentence: **or graded quality assurance categorization.** At the end of the second sentence: **that are not associated with Graded Quality Assurance (GQA) categorization.**
	5.1.3.1	DELETE	**Safety-related items may be procured as CGIs if a documented engineering evaluation indicates the CGI will provide equivalent performance.**
	5.1.3.1	INSERT	**Items may be procured as Commercial Grade Items (CGIs) if a documented engineering evaluation indicates the CGI will provide equivalent performance, or if identified**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			as "basic" coverage items as a result of Graded Quality Assurance (GQA) categorization.
	5.2.1	DELETE	**Originating and reviewing organization procedures shall require that**
	5.2.1	CHANGE	The last sentence will begin with: **The following...**
	5.2.1.1	DELETE	In the first sentence, directly before the word material: **applicable**. In the last sentence: **and be sufficient to preclude repetition of defects.**
	5.2.1.1	INSERT	Directly after "original requirements" in the last sentence: **(unless changed by GQA categorization) and be sufficient to preclude repetition of defects, unless otherwise specified and documented.**
	5.2.1.4	DELETE	**of quality-related items**
	5.2.1.8	INSERT	First bulleted item, directly after the word Documentation: **(e.g., certification)**
	5.4.1	DELETE	**quality-related**
	5.4.1	INSERT	Between "items" and "or services": **(for CGIs, when basis for dedication includes commercial grade survey)**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.4.1.4	INSERT	At the end of the section add: **, or for CGIs, to assure the program provides adequate control over established critical characteristics.**
	5.4.2	DELETE	**evaluated by Quality Assurance at least once each twelve months as provided by Reference 4.4.**
	5.4.2	INSERT	**periodically evaluated by Quality as provided by Reference 4.3.**
	5.4.2.1	DELETE	**Assurance**
	5.4.3.1	DELETE	**QA**
	5.4.3.2	DELETE	**Assurance**
	5.5.5	CHANGE	**Reference 4.8 to Reference 4.5**
	5.5.6.5	CHANGE	**Reference 4.9 to Reference 4.6**
	5.5.7	CHANGE	**QC to Quality**
	5.5.8.1	INSERT	Additional bulleted item: **Commercial Grade Item dedication**
	5.5.9	DELETE	**OQAP Chapter 13.0, Paragraph 5.2.9**
	5.5.9	INSERT	**Reference 4.6.**
	5.6.2	DELETE	**Entire paragraph text**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.6.2	INSERT	**The STPEGS survey and audit program provide for periodic scheduled audits or surveys of suppliers, the site procurement program, contractors, subcontractors, and others performing work. The audit and survey schedule is prepared and updated by Quality. Frequency of these surveys and audits is based upon the safety, complexity, and quality requirements, and as a minimum shall be in compliance with Reference 4.3.**
	6.1	CHANGE	**Reference 4.10 to Reference 4.7**
CH. 8.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	1.1	DELETE	**quality-related**
	2.1	DELETE	**quality**
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.1	INSERT	**Part A,**
	4.2	INSERT	**Part A,**
	5.1	DELETE	**quality related**
	5.5	DELETE	**quality-related**
	5.6	DELETE	**quality related**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
CH. 9.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.1	DELETE	**ANSI N45.2.2/Reg. Guide 1.38, Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants**
	4.1	INSERT	**UFSAR Table 3.12-1**
	4.2	DELETE	**ANSI N45.2.3/Reg. Guide 1.39, Housekeeping During the Construction Phase of Nuclear Power Plants**
	4.2	INSERT	**Part A, OQAP Chapter 4.0, Qualification, Training and Certification of Personnel**
	4.3	DELETE	**OQAP Chapter 4.0, Qualification, Training and Certification of Personnel**
	4.3	INSERT	**Part A, OQAP Chapter 7.0, Procurement**
	4.4	DELETE	**OQAP Chapter 4.0, Qualification, Training and Certification of Personnel**
	4.4	INSERT	**Part A, OQAP Chapter 14.0, Records Control**
	5.1	DELETE	**Quality-related**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.3.2	DELETE	**quality-related**
	5.6.1	CHANGE	**Reference 4.2 to Reference 4.1**
	5.7	CHANGE	**Reference 4.3 to Reference 4.2**
	6.1	CHANGE	**Reference 4.5 to Reference 4.4**
CH. 10.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	2.1	DELETE	**quality-related**
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.1	INSERT	**Part A,**
	4.2	INSERT	**Part A,**
	4.3	INSERT	**Part A,**
	5.1.3.2	DELETE	**QA**
	5.1.3.2	INSERT	**Quality**
	5.1.4.1	DELETE	**quality-related**
	5.1.6.1	DELETE	**QA/QC**
	5.1.6.1	INSERT	**Quality**
	5.1.6.2	DELETE	**QC**
	5.1.6.2	INSERT	**Quality**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
CH. 11.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	1.1	DELETE	**quality-related**
	2.1	DELETE	**quality-related**
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.2	INSERT	**Part A,**
	4.3	INSERT	**Part A,**
	4.4	INSERT	**Part A,**
	5.2	DELETE	**quality-related**
CH. 12.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	1.1	DELETE	**quality-related**
	2.1	DELETE	**quality-related**
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.1	INSERT	**Part A,**
	4.2	INSERT	**Part A,**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
CH. 13.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.6	INSERT	**Part A, OQAP Chapter 14.0, Records Control**
	4.7	INSERT	**UFSAR Table 3.12-1**
	5.7	DELETE	**QA**
	5.7	INSERT	**Quality**
CH. 14.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	1.1	DELETE	**quality-related**
	2.1	DELETE	**quality-related**
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.1	DELETE	**ANSI N45.2.9/Reg. Guide 1.88, Requirements for the Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records.**
	4.1	INSERT	**UFSAR Table 3.12-1**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
CH. 15.0	**The "header" for each page has been changed to reflect the new revision number and effective date.**		
	1.1	DELETE	**audits and surveillance**
	1.1	INSERT	**independent overview activities**
	2.1	DELETE	**internal audits and site surveillance which include preparation, performance, reporting, and follow-up**
	2.1	INSERT	**independent overview activities which includes audits, assessments, evaluations, performance monitoring, and surveillances**
	2.2	INSERT	**The requirements of this chapter are applicable for items/activities designated as "Full" or "Targeted".**
	4.1	DELETE	**ANSI N45.2.12/Reg. Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants**
	4.1	INSERT	**UFSAR Table 3.12-1**
	4.2	INSERT	**Part A,**
	4.3	INSERT	**Part A,**
	4.4	INSERT	**Part A,**
	4.5	INSERT	**Part A,**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.1	DELETE	A comprehensive audit program in compliance with Reference 4.1 shall be established and implemented by HL&P to verify internal and external quality activity compliance with the Operations QA Program. The audit program shall assure that applicable elements of tne program have been developed, documented, and are effectively implemented and shall provide for reporting and reviewing audit results by appropriate levels of management. The following areas are included in the audit program:
	5.1	INSERT	Independent Overview Activities
	5.1.1	DELETE	Operation, maintenance, and modifications
	5.1.1	INSERT	Procedures shall be developed to control independent overview activities. These activities include, but are not limited to, audits, assessments, evaluations, performance monitoring, and surveillances. These activities shall be used to observe and verify that activities are accomplished in accordance with prescribed requirements.

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.1.2	DELETE	**Preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings**
	5.1.3	DELETE	**Material and special process control**
	5.1.4	DELETE	**Indoectrination and training programs**
	5.1.5	DELETE	**Implementation of operating and test procedures**
	5.1.6	DELETE	**Calibration of measuring and test equipment**
	5.1.7	DELETE	**Corrective action and nonconformance control**
	5.1.8	DELETE	**Performance of the plant staff, including training records**
	5.1.9	DELETE	**Plant inspection activities**
	5.2	DELETE	**Qualified personnel assigned auditing responsibilities shall be independent of any direct responsibility for the performance of the activities which they audit; shall be experienced or trained commensurate with the scope and complexity of the activities to be audited; and shall be qualified in accordance with the requirements of Reference 4.2.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.2	INSERT	**Audits**
	5.2.1	DELETE	**An audit team consists of one (or more) qualified person(s). A qualified lead auditor shall be appointed as the audit team leader. The audit team leader shall be responsible for the written plans, checklists, team orientation, audit notification, pre-audit conference, audit performance, post-audit conference, reporting, and follow-up activity to assure corrective action. The audit team leader shall promptly report conditions requiring immediate corrective action to the appropriate management of the audited organization. Other audit findings will be identified to the audited organization at the post-audit conference. Formal audit reports shall be prepared and submitted to the audited organization within thirty days after the post-audit conference.**
	5.2.1	INSERT	**A comprehensive audit program in compliance with Reference 4.1 shall be established and implemented by HL&P to verify internal and external quality activity compliance with the Operations QA Program. The audit program shall assure that applicable elements of**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			the program have been developed, documented, and are effectively implemented and shall provide for reporting and reviewing audit results by appropriate levels of management. The following areas are included in the audit program:
	5.2.1.1	INSERT	**Operation, maintenance, and modifications**
	5.2.1.2	INSERT	**Preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings**
	5.2.1.3	INSERT	**Material and special process control**
	5.2.1.4	INSERT	**Indoctrination and training programs**
	5.2.1.5	INSERT	**Implementation of operating and test procedures**
	5.2.1.6	INSERT	**Calibration of measuring and test equipment**
	5.2.1.7	INSERT	**Corrective action and nonconformance control**
	5.2.1.8	INSERT	**Performance of the plant staff, including training records**
	5.2.1.9	INSERT	**Plant inspection activities**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.2.2	DELETE	Other personnel may assist in the conduct of audits, such as technical specialists, management representatives, or auditors in training. Such personnel selected for auditing assignments shall have training or experience commensurate with the scope, complexity, or special nature of the activities to be audited. Personnel performing audits shall have no direct responsibility for the area audited.
	5.2.2	INSERT	Qualified personnel assigned auditing responsibilities shall be independent of any direct responsibility for the performance of the activities which they audit; shall be experienced or trained commensurate with the scope, complexity, or special nature of the activities to be audited; and shall be qualified in accordance with the requirements of Reference 4.2.
	5.2.2.1	INSERT	An audit team consists of one (or more) qualified person(s). A qualified lead auditor shall be appointed as the audit team leader. The audit team leader shall be responsible for the written plans, checklists, team orientation, audit notification, pre-audit

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			conference, audit performance, post-audit conference, reporting, and follow-up activity to assure corrective action. The audit team leader shall promptly report conditions requiring immediate corrective action to the appropriate management of the audited organization. Other audit findings will be identified to the audited organization at the post-audit conference.
	5.2.2.2	INSERT	**Other qualified personnel may assist in the conduct of audits, such as technical specialists or management representatives.**
	5.2.3	INSERT	**Internal Audits**
	5.2.3.1	INSERT	**Internal audits shall be conducted by the Quality Department and performed with a frequency commensurate with their safety significance, past performance and regulatory requirements. Audits are scheduled on a nominal biennial frequency. If a decision is made to extend an audit beyond that nominal frequency, the basis for that decision shall be documented.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.2.3.2	INSERT	**Review of the audit program shall be performed at least semiannually by the Nuclear Safety Review Board or by a management representative to verify that audits are being accomplished in accordance with the requirements of the QA Program.**
	5.2.3.3	INSERT	**Audit results shall be reviewed periodically by the QA Organization for quality trends and overall audit program effectiveness. The results of these reviews shall be reported to appropriate management in periodic summary reports.**
	5.2.3.4	INSERT	**Audited organizations are responsible for providing timely corrective action including action to prevent recurrence for programmatic problems identified by an audit.**
	5.2.4	INSERT	**Supplemental audits shall be conducted when:**
	5.2.4.1	INSERT	**Significant changes are made to the quality assurance program.**
	5.2.4.2	INSERT	**It is necessary to determine the root cause of problem areas which may impact the effectiveness of the quality assurance program.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.2.4.3	INSERT	**A systematic, independent assessment of program effectiveness is necessary.**
	5.2.4.4	INSERT	**Requested by appropriate management.**
	5.2.5	INSERT	**Audit implementation shall include the following:**
	5.2.5.1	INSERT	**Written notification to the audited organization of the audit, if an announced audit.**
	5.2.5.2	INSERT	**Development of an individual audit plan/scope. The audit plan and any necessary reference documents shall be available to the audit team members.**
	5.2.5.3	INSERT	**A pre-audit and post-audit conference with responsible organizational management.**
	5.2.5.4	INSERT	**Use of a checklist or procedure as a guide during the performance of the audit.**
	5.2.5.5	INSERT	**Identifying and documenting audit deficiencies.**
	5.2.5.6	INSERT	**Audit reports shall be prepared and submitted to the audited organization within thirty days after the post-audit conference. The audit report shall address those items required by Reference 4.1.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.2.5.7	INSERT	**Audited organizations provide timely and thorough corrective action and recurrence control to discrepancies identified during the audit. In the event that corrective action cannot be completed within thirty days, the audited organization's response shall include a scheduled date for the corrective action. Earlier dates for corrective action may be established if circumstances dictate.**
	5.2.5.8	INSERT	**Evaluation of corrective action for deficiencies and follow-up verification as appropriate.**
	5.3	DELETE	**An approved audit plan shall be issued annually to include:**
	5.3	INSERT	**Quality Performance Monitoring**
	5.3.1	DELETE	**Activities/organizations to be audited.**
	5.3.1	INSERT	**Procedures and/or instructions shall be developed to control quality performance monitoring activities. Quality performance monitoring activities shall be used to observe and verify that activities are accomplished in accordance with prescribed procedures.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.3.2	DELETE	Time frame in which the audit will be conducted.
	5.3.2	INSERT	Quality performance monitoring activities will be performed on both units during refueling outages, startup activities, and normal and off-normal operational activities. Areas to be monitored will be determined based on safety significance, past performance, regulatory requirements, and customer request.
	5.3.3	INSERT	The frequency of site quality performance monitoring activities is based upon the complexity of the activity, importance of the activity, and severity level of conditions noted during previous overview activities.
	5.3.4	INSERT	Quality performance monitoring results shall be documented and a summary shall be prepared and transmitted to responsible management.
	5.4	DELETE	Internal Audits
	5.4	INSERT	Assessments/Evaluations
	5.4.1	DELETE	Internal audits shall be conducted by the Quality Department and performed with a frequency commensurate with their safety significance,

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			past performance and regulatory requirements. An audit of safety-related activities shall be completed in accordance with formal audit schedules.
	5.4.1	INSERT	**Assessments are conducted annually in accordance with written procedures to assess Nuclear Assurance & Licensing's implementation of the Operations Quality Assurance Program.**
	5.4.1.1	INSERT	**These assessments will be conducted by organizations independent of the activities performed to assure the HL&P OQAP is being properly implemented.**
	5.4.1.2	INSERT	**The Nuclear Safety Review Board shall define the scope of the assessment and determine the schedule.**
	5.4.1.3	INSERT	**The results of these assessments will be transmitted to the Executive Vice President and General Manager, Nuclear.**
	5.4.2	DELETE	**Review of the audit program shall be performed at least semiannually by the independent review body or by a management representative to verify that audits are being accomplished in accordance**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			with the requirements of the QA Program.
	5.4.2	INSERT	**Other assessments/evaluations may be performed to verify activities are accomplished in accordance with applicable requirements and prescribed procedures.**
	5.4.2.1	INSERT	**These assessments/evaluations will be performed on areas based on their safety significance, past performance, regulatory requirements, and customer request.**
	5.4.2.2	INSERT	**Assessment/evaluation results shall be documented and transmitted to appropriate management.**
	5.4.3	DELETE	**Audit results shall be reviewed periodically by the QA Organization for quality trends and overall audit program effectiveness. The results of these reviews shall be reported to appropriate management in periodic summary reports.**
	5.4.3	INSERT	**Assessments and audits may be interchangeable provided the scope is appropriate and approved by the Director, Quality.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.4.4	DELETE	**Audited organizations are responsible for providing timely corrective action inlucing action to prevent recurrence for programmatic problems identified by an audit or surveillance.**
	5.5	DELETE	**Supplemental audits shall be conducted when:**
	5.5	INSERT	**An approved overview plan shall be issued annually to include:**
	5.5.1	DELETE	**Significant changes are made to the quality assurance program.**
	5.5.1	INSERT	**Activities/organizations to be overviewed.**
	5.5.2	DELETE	**It is necessary to determine the root cause of problem areas which may impact the effectiveness of the quality assurance program.**
	5.5.2	INSERT	**Time fram in which the overview activity will be conducted.**
	5.5.3	DELETE	**A systematic, independent assessment of program effectiveness is necessary.**
	5.5.4	DELETE	**Requested by appropriate management.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.6	DELETE	**Audit implementation shall include the following:**
	5.6	INSERT	**Nonconforming equipment, components, parts, materials, activities or documentation identified during an independent overview activity shall be documented in accordance with Reference 4.4.**
	5.6.1	DELETE	**Written notification to the audited organization of the scheduled audit, if an announced audit.**
	5.6.2	DELETE	**Development of an individual audit plan/scope.**
	5.6.2.1	DELETE	**The audit plan and any necessary reference documents shall be available to the audit team members.**
	5.6.3	DELETE	**A pre-audit and post-audit conference with responsible organizational management.**
	5.6.4	DELETE	**Use of a checklist or procedure as a guide during the performance of the audit.**
	5.6.5	DELETE	**Identifying and documenting audit deficiencies.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.6.6	DELETE	**Audit reports shall be prepared and submitted to the audited organization within thirty days after the post-audit conference. The audit report shall address those items required by Reference 4.1.**
	5.6.7	DELETE	**Audited organizations provide timely and thorough corrective action and recurrence control to discrepancies identified during the audit. In the event that corrective action cannot be completed within thirty days, the audited organization's response shall include a scheduled date for the corrective action. Earlier dates for corrective action may be established if circumstances dictate.**
	5.6.8	DELETE	**Evaluation of corrective action for deficiencies and follow-up verification as appropriate.**
	5.7	DELETE	**Assessments are conducted annually to assess HL&P's implementation of the Operations Quality Assurance Program. These assessments will be conducted by organizations independent of the activities performed to assure the HL&P OQAP is being properly implemented. The Nuclear Safety Review Board**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
			shall define the scope of the assessment and determine the schedule. The results of these assessments will be transmitted to the Group Vice President, Nuclear.
	5.7	INSERT	**Personnel performing independent overview activities shall be trained and qualified in accordance with Reference 4.2.**
	5.8	DELETE	**Procedures shall be developed to control site surveillance activities. Site surveillance shall be used to observe and verify that quality-related activities are accomplished in accordance with prescribed procedures.**
	5.9	DELETE	**A surveillance schedule shall be developed to ensure adequate coverage of quality-related activities.**
	5.9.1	DELETE	**The frequency of site surveillance is based upon the complexity of the activity, importance of the activity, and magnitude of discrepancies noted during previous audits or surveillance.**
	5.9.2	DELETE	**Unscheduled site surveillance may be performed to accommodate changes in plant conditions or systems.**

ALL CHANGES ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
	5.10	DELETE	**Scheduled site surveillances are performed using a surveillance checklist. The surveillance checklist shall be prepared using applicable procedures, specifications, codes, and regulatory requirements for source requirements.**
	5.11	DELETE	**Site surveillance results are documented, and a summary of surveillance and evaluation of surveillance findings shall be prepared and transmitted to responsible management.**
	5.12	DELETE	**Nonconforming equipment, components, parts, materials, activities or documentation identified during an audit or site surveillance shall be documented in accordance with Reference 4.4.**
	5.13	DELETE	**Personnel performing surveillance shall be trained and qualified in accordance with Reference 4.2.**

Part B of the OQAP, containing a Table of Contents and 15 new chapters, will not be specifically detailed here in the Summary of Changes. Note that Part B utilizes the Definition, Chapter 1.0, and Chapter 2.0 from Part A.