

Iowa Electric Light and Power Company
NUCLEAR GENERATION DIVISION
October 19, 1992

RICHARD W. MCGAUGHY
VICE PRESIDENT, PRODUCTION

NG-92-4520

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Subject: Duane Arnold Energy Center
Docket Number 50-331
Operating License DPR-49
Reporting of Changes to the Quality Assurance
Program Description, UFSAR 17.2
Reference: Letter from R. W. McGaughy (Iowa Electric)
to T. E. Murley (NRC) of June 26, 1992
(NG-92-1114)
File: A-116, A-165, Q-98

Dear Dr. Murley:

The referenced letter submitted Revision 13 of the Duane Arnold Energy Center Quality Assurance Program Description (QAPD). This letter advises the NRC of organizational adjustments to the Quality Assurance Organization. Iowa Electric Light and Power Company requests that the NRC staff review this submittal with the reference 1 letter and its attachments.

The recent organizational adjustments include changes in titles from Group Leader, Internal Audits to Quality Assurance Assessment Supervisor; from Quality Assurance Supervisor to Quality Assurance Procurement Supervisor; and from Group Leader, Quality Support to Group Leader, Surveillance; and reassignment of responsibilities for corrective action, quality assurance trending, and performance of internal surveillances from the Quality Assurance Supervisor to the Quality Assurance Assessment Supervisor.

Attachment 1 to this letter contains revised pages of the QAPD, UFSAR Section 17.2, Revision 13, which have been affected. They are pages 17.2-1 through 17.2-4 which contain the description of the Quality Assurance Organization. Attachment 1 includes both the changes already made in Revision 13 submitted by the referenced letter and those referred to above.

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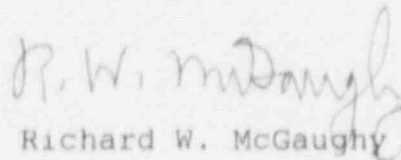
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Attachment 2 to this submittal discusses the changes in the QAPD referred to above (which are identified by revision bars in the right hand margin in UFSAR 17.2 and identified as Revision 13A). Attachment 2 also explains the reasons for the changes and states the bases for concluding that the Program continues to satisfy the criteria of 10 CFR Part 50, Appendix B, and QAPD commitments previously accepted by the NRC.

Sincerely


Richard W. McGaughy

RWM/KEP/hjf

Attachments:

- 1) UFSAR/DAEC-1, Chapter 17.2, Revision 13A, Date to be determined
- 2) Discussion of Changes in the Quality Assurance Program Description

cc: K. Peveler
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17.2 QUALITY ASSURANCE DURING THE OPERATIONS PHASE

17.2.0 INTRODUCTION

17.2.0.1 Scope

To maintain the high quality of plant systems and equipment during operation, maintenance, repair, modification, and refueling of the Duane Arnold Energy Center (DAEC), a comprehensive quality assurance program has been implemented. The objective of this program is to maintain managerial and administrative control over the operations of and activities relative to safety-related structures, systems, equipment, and components during the operating life of the DAEC. This program is designed to meet the intent of Appendix B to 10 CFR Part 50.

17.2.0.2 Corporate Policy

Iowa Electric considers the operation of the DAEC to be an extension of the basic policies established and documented for design, construction, and startup.

The policies and procedures identified within this report regarding "operating phase" will form the basis for plant-life operation of the DAEC.

Where contractors and suppliers are used during the life of the operating DAEC, their function will be controlled by the Operational Quality Assurance Program.

It is the objective of Iowa Electric that the DAEC shall be operated effectively, efficiently, and in such a manner as not to jeopardize the health or safety of the public.

17.2.1 ORGANIZATION

17.2.1.1 Scope

Iowa Electric has established an operating organization that is structured to support DAEC operating requirements as well as meet corporate needs in other areas. This overall organization is described in UFSAR Chapter 13, Conduct of Operations, Section 13.1, Organizational Structure for Iowa Electric. The organization chart, which identifies both the "on-site" and "off-site" organizational elements that function under the cognizance of the quality assurance program, appears as Figure 13.1-1, Iowa Electric Corporate Organization. Chapter 13 describes the quality assurance responsibilities of each of the organizational elements noted on the organization chart.

Additional detail concerning the Quality Assurance Department is presented in Chapter 17.2, Section 17.2.1.2.

The responsibility and authority for the establishment and execution of the Operational Quality Assurance Program for the operation of the DAEC will be retained by Iowa Electric.

17.2.1.2 Manager, Corporate Quality Assurance

The Manager, Corporate Quality Assurance reports to the Vice President - Production and is assigned the primary responsibility for ensuring that quality requirements relative to the safe operation of the DAEC are identified and met.

Fulfilling the responsibilities of the Corporate Quality Assurance Department requires significant communication with the DAEC, the Outage Manager, the Nuclear Licensing Department, the Emergency Planning Department, the Nuclear Fuels Group, the Engineering Department, the Training Department, and the Purchasing Department.

The Manager, Corporate Quality Assurance is responsible for preparing and maintaining the Operational Quality Assurance Program.

The Manager, Corporate Quality Assurance is also responsible for evaluating the effectiveness of the Operational Quality Assurance Program and issuing periodic reports to the appropriate levels of management.

The Manager, Corporate Quality Assurance provides support to the Safety Committee.

17.2.1.2.1 Quality Assurance Procurement Supervisor

The Quality Assurance Procurement Supervisor reports to the Manager, Corporate Quality Assurance and, along with the Quality Control Supervisor and the Quality Assurance Assessments Supervisor, is responsible for verifying that the Operational Quality Assurance Program is being implemented effectively at the DAEC and other locations in support of the DAEC.

The Quality Assurance Procurement Supervisor provides quality assurance support for the procurement of materials and equipment. Procurement activities include audits, surveillances, and evaluations of suppliers and contractors for quality capabilities and performance; maintaining the list of approved suppliers for nuclear procurements; and reviewing procurement documents.

The Quality Assurance Procurement Supervisor is assisted in the implementation of these responsibilities by the Group Leader, Material and Supplier Quality.

17.2.1.2.2 Quality Assurance Assessment Supervisor

The Quality Assurance Assessment Supervisor reports to the Manager, Corporate Quality Assurance and is responsible for evaluating the effectiveness of the Operational Quality Assurance Program through the implementation of the internal audit and surveillance programs. The Quality Assurance Assessment Supervisor is also responsible for the implementation of the corrective action and trending program. The Quality Assurance Assessment Supervisor is assisted in these duties by the Group Leader, Audits, and Group Leader, Surveillance.

17.2.1.2.3 Quality Control Supervisor

The Quality Control Supervisor reports to the Manager, Corporate Quality Assurance and, along with the Quality Assurance Procurement Supervisor and the Quality Assurance Assessments Supervisor is responsible for verifying that the Operational Quality Assurance Program is being implemented effectively at the DAEC. The Quality Control Supervisor reviews plant operation, maintenance, modification, and testing documents for inclusion of adequate quality requirements and for inclusion of inspection, witness and hold points; and provides the necessary support to perform the inspections and tests. The Quality Control Supervisor is responsible for preparing receiving inspection plans and in performing receiving, in-process, and final inspections.

Responsibilities relative to the Ten Year Inservice Inspection Program include performance of the required examinations and evaluation of indications of defects.

Additionally, the Quality Control Supervisor is responsible for training the Quality Control group in nondestructive examination (NDE) disciplines and interfacing with the Quality Assurance Training Coordinator on other areas requiring training.

The Quality Control Supervisor also supports the DAEC Operations Committee.

17.2.1.2.3.1 Corporate Level III NDE

The Corporate Level III NDE reports to the Quality Control Supervisor and is responsible for developing and implementing the NDE program, including providing the necessary training.

17.2.1.2.4 Quality Assurance Training Coordinator

The Corporate Quality Assurance Department Training Coordinator reports to the Manager, Corporate Quality Assurance and provides training for the Quality Assurance Department. In addition, training relative to the Operational Quality Assurance Program is provided to the Nuclear Generation Division.

17.2.1.2.5 Quality Assurance Programs Engineer

The Quality Assurance Program Engineer reports to the Manager, Corporate Quality Assurance and is responsible for assisting the Manager, Corporate Quality Assurance in preparing and maintaining the Operational Quality Assurance Program and Quality Assurance Department implementing procedures.

The Quality Assurance Program Engineer is responsible for the review of divisional procedures that are responsive to the requirements of the Operational Quality Assurance Program for concurrence by the Quality Assurance Department.

17.2.1.2.6 Stop Work Authority

The Manager, Corporate Quality Assurance has the authority to issue a stop work instruction to the organization that has direct responsibility for the work. Only the Vice President - Production has the authority to override the stop-work instruction.

17.2.2 OPERATIONAL QUALITY ASSURANCE PROGRAM

17.2.2.1 Scope

Iowa Electric has established an Operational Quality Assurance Program that applies to those structures, systems, and components, that are safety-related and those activities that affect those structures, systems, and components that are safety-related. Safety-related structures, systems, and components are those that ensure the integrity of the reactor coolant pressure boundary, shut down the reactor, and maintain the reactor in a safe shut down condition, or prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public.

17.2.2.2 Basis

10 CFR Part 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants, and certain regulatory guides, form the basis for the Operational Quality Assurance Program. Appendix A to UFSAR Chapter 17.2 identifies the particular regulatory guides to which Iowa Electric is committed and which are included in the basis for the Operational Quality Assurance Program.

17.2.2.3 Identification of Safety-Related Structures, Systems, Components and Items

The pertinent requirements of the Operational Quality Assurance Program apply to all activities affecting the safety-related functions of those 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. A current list of safety related structures, systems and components is contained in Section 3.2 of the DAEC Updated Final Safety Analysis Report. This

Discussion of Changes to UFSAR 17.2 Revision 13A

17.2.1.2.1 Quality Assurance Supervisor (now Quality Assurance Procurement Supervisor)

IDENTIFICATION OF THE CHANGES:

The title of Quality Assurance Supervisor has been changed to "Quality Assurance Procurement Supervisor." The Quality Assurance Procurement Supervisor continues to be responsible for all activities related to procurement as previously specified. The Quality Assurance Procurement Supervisor is no longer responsible for the performance of internal surveillances and implementation of the corrective action and trending programs. These responsibilities are now assigned to the position entitled "Quality Assurance Assessment Supervisor" (reference paragraph 17.2.1.2.2). The previous position of Group Leader, Quality Support is now called Group Leader, Surveillance and reports to the Quality Assurance Assessment Supervisor. This Group Leader will continue to be responsible for supporting the internal surveillance program.

REASON FOR THE CHANGES:

The above changes will allow the Quality Assurance Procurement Supervisor to focus attention on the quality assurance procurement activities.

BASIS FOR CONCLUDING THE CHANGES CONTINUE TO SATISFY 10 CFR PART 50, Appendix B AND PREVIOUS QUALITY ASSURANCE COMMITMENTS:

The above change only reflects a reassignment of responsibilities within the Quality Assurance organization. There are no new responsibilities assigned, nor are any responsibilities eliminated from the quality assurance organization. There is no change in staffing level as a result of this change. This change results in continued compliance with 10 CFR Part 50, Appendix B, Criterion I, to have the organizational responsibilities and authorities clearly defined. This change continues to satisfy the requirements of 10 CFR Part 50, Appendix B, Criterion I and the quality assurance program commitments as previously reviewed and approved by the NRC.

17.2.1.2.2 Group Leader, Internal Audits (now Quality Assurance Assessment Supervisor)

IDENTIFICATION OF CHANGES:

The Group Leader, Internal Audits previously had responsibility only for the internal audit program. The Quality Assurance Assessment Supervisor will continue to be responsible for the internal audit program, but will also be responsible for the internal surveillance program and the corrective action and trending program. The Quality Assurance Assessment Supervisor will be supported in the implementation of these responsibilities by the Group Leader, Surveillance (formerly Group Leader, Quality Support) and the Group Leader, Audits.

REASON FOR THE CHANGES:

The functions of internal audits, internal surveillance, and quality assurance program trending and corrective action are all related to internal quality assurance evaluation activities. Consolidating these functions under one Supervisor will improve the coordination of these functions.

BASIS FOR CONCLUDING THE CHANGES CONTINUE TO SATISFY 10 CFR PART 50, APPENDIX B AND PREVIOUS QUALITY ASSURANCE COMMITMENTS:

The above changes only reflect a reassignment of responsibilities within the Quality Assurance organization and changes in titles. There are no new responsibilities assigned, nor are there any responsibilities eliminated from the quality assurance organization. There is no change in staffing level as a result of this change. This change results in continued compliance with 10 CFR Part 50, Appendix B, Criterion I, to have the organizational responsibilities and authorities clearly defined. This change continues to satisfy the requirements of 10 CFR Part 50, Appendix B, Criterion I, and the quality assurance program commitments previously reviewed and approved by the NRC.

17.2.1.2.3 Quality Control Supervisor

IDENTIFICATION OF CHANGE:

The references to Group Leader, Audits and Quality Assurance Supervisor are changed to reflect the new titles for these positions.

REASON FOR THE CHANGE:

The position of Group Leader, Internal Audits has been revised to Quality Assurance Assessment Supervisor as described in 17.2.1.2.2 above.

The position of Quality Assurance Supervisor has been revised to Quality Assurance Procurement Supervisor as described in 17.2.1.2.1 above.

BASIS FOR CONCLUDING THE CHANGES CONTINUE TO SATISFY 10 CFR PART 50, APPENDIX B AND PREVIOUS QUALITY ASSURANCE COMMITMENTS:

These changes are administrative only, recognizing the change in titles from Group Leader, Internal Audits to Quality Assurance Assessment Supervisor, and Quality Assurance Supervisor to Quality Assurance Procurement Supervisor. See the discussion in 17.2.1.2.1 and 17.2.1.2.2 above.