

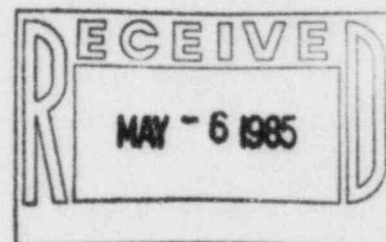
The Light company

Houston Lighting & Power P.O. Box 1700 Houston, Texas 77001 (713) 228-9211

April 30, 1985
ST-HL-AE-1247
File No.: G9.11/Q39.

Mr. Robert D. Martin
Regional Administrator, Region IV
Nuclear Regulatory Commission
611 Ryan Plaza, Dr., Suite 1000
Arlington, TX 76012

South Texas Project
Units I & II
Docket Nos. STN 50-498, STN 50-499
Quality Assurance Program
for the Design and Construction Phase
of the South Texas Project



Dear Mr. Martin:

Enclosed is Revision 11 of the Quality Assurance Program Description (QAPD) for the design and construction phase of the South Texas Project (STP). This revision is being submitted in accordance with the requirements of 10CFR50.55(f)(3).

Included in this submittal are complete replacements for Part A, Houston Lighting and Power Company (HL&P) QAPD, Part B, Bechtel Energy Corporation QAPD and Part C, Ebasco QAPD.

Part A has been revised to describe changes in organization titles, areas of responsibility and reporting relationships; to clarify procedures to be used by HL&P during the performance of special process examinations and to clarify HL&P's position on ANSI N45.2.5 - 1974 for the design and construction phase. These changes are described in more detail in Attachment A.

Part B to the QAPD, which was formerly the Bechtel Topical Report, BQ-TOP-1, Revision 3A amended for use on the STP, has been re-formatted as an STP specific document separate from the Bechtel Topical Report. Also included is a clarification of the position taken on ANSI N45.2.5 - 1974 for the design and construction phase. Details on the changes made to reformat Part B are included on Attachment B to this letter.

Part C to the QAPD, which was formerly the Ebasco Topical Report, ETR-1001, Revision 12 amended for use on the STP, has also been reformatted as an STP specific document. Also included are clarifications of the positions taken on ANSI N45.2.5 - 1974 and ANSI N45.2.6 during the design and construction phase, organizational changes, and changes to include information on the review, approval and distribution of STP Standard Site Procedures. Details on the changes made to Part C are included on Attachment C to this letter.

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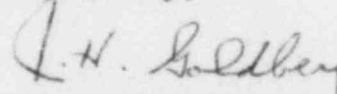
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These changes to Parts A, B and C do not reduce commitments made in previous revisions to the QAPD. The revised QAPD continues to satisfy criteria to 10CFR50, Appendix B. The changes described in Revision 11 to the QAPD are being implemented immediately. Included with the detailed description of the individual changes discussed above is the basis for concluding that previous commitments have not been reduced. In addition to the changes summarized above, a number of editorial and clarification changes have been made throughout Part C of the QAPD.


Copies of Revision 11 to the QAPD are also being submitted to the NRC Resident Inspector at the South Texas Project site and to the NRC Document Control Desk as required by 10CFR50.55(f)(3)(i).

If you have any questions, please contact Mr. Michael E. Powell at 713/993-1328.

Sincerely,



J. H. Goldberg
Group Vice President, Nuclear


JHG/JWE/DMW:jsw

cc:

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Quality Assurance Program Description
for the
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Revision 11
Principal Changes

Part A, Houston Lighting & Power Company (HL&P QAPD)

- ° Revision to clarify services provided by Ebasco subsidiaries.

Page 4 has been revised to reflect that construction services are provided by Ebasco Construction, Inc. (ECI) while quality assurance and quality control functions are provided by Ebasco Services, Inc. (ESI). No reduction in commitment has been made.

- ° Revision to clarify program documents describing Quality Assurance controls on the STP.

Page 6 was revised to delete the reference to an interface between the Project Quality Assurance Plan and the Corporate Quality Assurance program objectives in establishing Quality Assurance controls on the STP. The use of Corporate Quality Assurance program objectives in this context refers to the now deleted Nuclear Quality Assurance Program Manual (NQAPM). The NQAPM, originally intended as an umbrella document for all HL&P nuclear activities, was deleted when nuclear work became limited to the STP. Applicable portions of the NQAPM were incorporated into revision 6 of the QAPD. No reduction in commitment has occurred.

- ° Revision to describe changes in organizational structure and reporting functions.

Section 1.0 was rearranged and renumbered to reflect organizational changes within Executive Management, the Construction Organization, Records Management and Quality Assurance. The attached table describes the title changes, reporting changes, responsibility reassignments, if applicable, and the affected paragraphs for each change within Section 1.0. The majority of the changes represent title changes only with no reassignment of responsibilities. For positions that have been deleted, reassignment of the previous responsibilities are indicated. No reduction in commitment has occurred.

- ° Revision to clarify procedures to be used by HL&P when performing special process examinations during the inspection verification process.

Page 28 was revised to allow use of the same procedure used during the initial examination when performing inspection verification of special processes rather than limiting the procedure to those approved by HL&P Level III NDE personnel. This was revised to allow the use of Ebasco NDE procedures which are approved by Ebasco Level III personnel. No reduction in commitment has been made.

- ° Revision to clarify HL&P position on ANSI N45.2.5 - 1974

Table 1 was revised to clarify the actions to be taken if two consecutive correlation tests exceed the specification limits for slump, air content or temperature. Previous exceptions to ANSI N45.2.5 specified that testing would be performed at the point of discharge. This modification would allow, in the case of two consecutive correlation tests that exceed specification limits, a shift to testing at the point of placement. This is in accordance with the original requirements of ANSI N45.2.5. No reduction in commitments has occurred.

- ° Revision to clarify/add procedures used to implement the STP Quality Assurance Program.

Table 2 was revised to clarify that Support QA Department Procedures were revised to Technical Services Procedures to align with the corresponding organizational change (reference section 1.0). Also added were newly implemented Standard Site Procedures which were developed to provide a uniform method of performing activities common between HL&P, Bechtel and Ebasco. No reduction in commitment has occurred.

<u>Current Position (QAPD, Revision 11)</u>	<u>Previous Position (QAPD, Revision 10)</u>	<u>Responsibility Reassignment</u>	<u>Affected Paragraphs</u>
Group Vice President, Nuclear	Executive Vice President Nuclear Group	Responsibilities previously assigned to Executive Vice President, Nuclear Group assumed by Group Vice Presi- dent, Nuclear with one exception. The Manager, Nuclear Training, who previously reported to the Executive Vice President, Nuclear Group, now reports to the Vice President, Nuclear Plant Operations.	1.2, 1.3a, 1.4, 1.4.1, 1.6, 2.5, 2.10, 18.0
N/A	Vice President, Nuclear Engineering and Construction	This position was deleted. Posi- tions previously reporting to Vice President, Nuclear Engineer- ing and Const. now report to the Group Vice President, Nuclear.	1.4, 1.4.16, 1.4.19, 1.4.20
Construction Manager	Site Manager	Title change. Direction to Site Security, pre- viously provided by the Site Support Services Manager, and Administrative Services, previous- ly provided by the Manager, Support Services were added.	1.4.2, 1.4.4, 1.4.5

<u>Current Position</u> <u>(QAPD, Revision 11)</u>	<u>Previous Position</u> <u>(QAPD, Revision 10)</u>	<u>Responsibility</u> <u>Reassignment</u>	<u>Affected</u> <u>Paragraphs</u>
Project Controls and Site Support Manager	Site Support Services Manager	Title change. Previously re- ported to the Site Manager, now reports to the Deputy Project Manager. Previous responsibilities for Site Security and Site Records Management reassigned to the Construction Manager and Manager, STP, respectively. Assumed responsi- bility for Project Controls which was previously assigned to the Manager, Support Services.	1.4.3
Construction Superintendent	Site Construction Manager	Title change. All responsibili- ties previously assigned to the Site Construction Manager now assumed by Construction Superintendent.	1.4.5, 1.4.6
Principal Engineer, Site Engineering	Principal Engineer, Site	Title change. Project direction to Supervising Project Engineer, Construction Support, which was previously provided by the Site Construction Manager, was added to the Principal Engineer, Site Engineering, responsibilities.	1.4.7, 1.4.8

<u>Current Position (QAPD, Revision 11)</u>	<u>Previous Position (QAPD, Revision 10)</u>	<u>Responsibility Reassignment</u>	<u>Affected Paragraphs</u>
Unit/Startup General Supervisors	Construction Superintendents	Title change. All responsibilities previously assigned to the Construction Superintendents assumed by Unit/Startup Supvsrs.	1.4.6
Principal Engineer, Operational Support	N/A	Newly added position. Added to provide an interface between Construction, Engineering and Licensing in matters related to fuel load and licensing of the STP.	1.4.2, 1.4.9
N/A	Manager, Support Services	This position was deleted. Responsibilities previously assigned to the Manager, Support Services are assumed by the Project Controls and Site Support Manager, the Construction Manager and the Manager, STP. Those positions previously reporting to the Manager, Support Services, now report to the Manager, STP.	1.4.3, 1.4.4, 1.4.12, 1.4.13

<u>Current Position (QAPD, Revision 11)</u>	<u>Previous Position (QAPD, Revision 10)</u>	<u>Responsibility Reassignment</u>	<u>Affected Paragraphs</u>
Manager, Nuclear Assurance	Manager, Quality Assurance	This change was made to dedicate the Manager, Nuclear Assurance to Nuclear Quality Assurance activities and remove previous responsibilities for Fossil Quality Assurance activities. All STP personnel previously reporting to the Manager, Quality Assurance, now report to the Manager, Nuclear Assurance. All responsibilities previously assigned to the Manager, Quality Assurance, related to the STP are now assumed by the Manager, Nuclear Assurance.	1.3a, 1.4, 1.6, 1.6.1, 1.6.7, 2.5
General Supervisor, Technical Services	Support Quality Assurance Manager	Title change. All responsibilities assigned to the Support Quality Assurance Manager now assumed by the General Supervisor, Technical Services. All references within the text to Corporate or Corporate QA activities have been changed to reference Technical Services.	1.3a, 1.6, 1.6.7, 5.0, 18.0
Manager, Nuclear Purchasing	Manager, Nuclear Purchasing	Change in description of responsibilities to more accurately reflect actual activities.	1.4.13, 1.4.15
Project Contracts Manager	Project Contracts Manager		

Quality Assurance Program Description
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Part B, Bechtel Energy Corporation (BEC QAPD)

- ° Revision to reformat Part B to the QAPD as an STP specific document separate from the Bechtel Topical Report, BQ-TOP-1, Revision 3A.

The purpose of this revision was to remove references to corporate organizations and functions unrelated to STP activities and to replace generic descriptions of Bechtel's activities with STP specific terminology. The majority of the changes impact the Introduction, Section 1.0, "Organization" and Section 2.0, "Quality Program". The remaining sections have been affected although the changes are mainly limited to incorporation of the existing addenda to the Topical Report and replacement of generic titles or activities with STP specific titles and activities. A description of the main types of changes is provided below. Due to the extensive nature of the changes, no change bars have been added delineating these changes.

- a) Corporate organizational descriptions have been modified to describe only those organizations directly responsible for STP activities. For example, references to the Thermal Power Organization have been deleted and replaced with Bechtel Energy Corporation. Additional description has been provided for the Western Power Division. References to specific individuals within the corporate organization responsible for STP activities have replaced generic titles.
- b) Generic terminology for BEC activities or non-BEC organizations have been replaced by STP specific descriptions. For example, organizations such as the client, NSSS supplier and "the project" have been replaced by HL&P, Westinghouse and STP respectively. Other generic terminology such as CARs (Corrective Action Reports), Inspection plans/instructions, procurement inspection and subcontractor have been changed to SDRs (Standard Deficiency Reports), Quality plans/instructions, procurement surveillance and contractor respectively.
- c) The addendum, previously included as a forward to the Topical Report amending the Topical to address specific STP requirements, has been incorporated in total.
- d) The correspondence preceding the Topical Report describing the Bechtel Corporate organizational changes have been deleted. Applicable organizational structures have been incorporated into the QAPD, Part B.

These changes have been incorporated to limit future revisions of the QAPD to only those changes directly impacting organizations and activities on the STP. No reduction in commitments has been made.

- ° Revision to modify the position taken on ANSI N45.2.5.

Appendix A, Page A-12, was revised to clarify the actions to be taken if two consecutive correlation tests exceed the specification limits for slump, air content or temperature. Previous exceptions to ANSI N45.2.5 specified that testing would be performed at the point of discharge. This modification would allow, in the case of two consecutive correlation tests that exceed specification limits, a shift to testing at the point of placement. This is in accordance with the original requirements of ANSI N45.2.5. No reduction in previous commitments has occurred.

Quality Assurance Program Description
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Principal Changes

Part C, Ebasco QAPD

The following is a brief description of the changes made to Part C of the QAPD and the basis for concluding that there has been no reduction in commitment. A general description of the major changes is provided below. Additional detail on each change made within Part C is provided on the attached pages.

- ° Revision to reformat Part C to the QAPD as an STP specific document separate from the existing Ebasco Topical Report, ETR-1001, Revision 12.

The purpose of this revision was to delete references to corporate organizations or functions unrelated to STP activities and to physically reformat Part C to be consistent with Part A of the QAPD. The changes made included the following:

- a) Revised physical format to delete separate revision number for each individual section. Revision for Part C, in total, is now Revision 11, consistent with Parts A and B of the QAPD. Reference the following section on the attached pages for additional detail: General Section, changes 2 and 3
- b) Deleted references to company-wide activities and replaced with STP. Reference the following section on the attached pages for additional detail: Section QA-I-1, change 5

These changes were made to promote consistency within Parts A, B, and C of the QAPD and to reduce the number of future revisions of the QAPD to those changes specifically applicable to STP related organizations and functions. No reduction in previous commitments has been made.

- ° Revision to incorporate organizational changes.

The organization of Corporate Engineering and Consulting Services was changed to Corporate and Consulting Engineering. Since this change reflects a title rather than a functional change, no reduction in commitment has occurred.

Reference the following sections on the attached pages for additional detail: Section QA-I-1, change 3 and Section QA-I-2, changes 1 and 2

- ° Revision to incorporate Standard Site Procedures.

Standard Site Procedures were developed to provide a uniform method of performing activities common between HL&P, Bechtel and Ebasco. Descriptions relating to the review, approval and distribution of these procedures was added to Part C. No reduction in commitment has been made. Reference the following sections on the attached pages for additional detail: Section QA-I-1, changes 6, 7 and 8; Section QA-I-2, changes 3, 4 and 6; Section QA-III-1, changes 1, 2 and 5; Section QA-III-2, changes 1 and 3

- ° Revision to modify position on ANSI N45.2.6.

Part C has been revised to allow compliance with ANSI N45.2.6 - 1978 and R.G. 1.58 (Rev. 1, 9/80) in its entirety as an alternate to the previous commitment to comply with ANSI N45.2.6 - 1973 and R.G. 1.58 (Rev. 0, 8/73) as modified by positions C.5, C.6, C.7, C.8, and C.10 of R.G. 1.58, Rev. 1.

This change is being made to provide the flexibility to align the construction phase commitment to ANSI N45.2.6 with the operations phase commitment made in the FSAR, Table 3.12-1 and to allow STP vendors to comply with the 1978 version of ANSI N45.2.6. This is not a reduction in commitment since the NRC has already endorsed the use of ANSI N45.2.6 - 1978 in Regulatory Guide 1.58, Revision 1, dated September 1980. Reference the following sections on the attached pages for additional detail: Section QA-I-1, change 1 and Appendix II change 2

- ° Revision to modify position on ANSI N45.2.5.

Appendix II was revised to clarify the actions to be taken if two consecutive correlation tests exceed the specification limits for slump, air content or temperature. Previous exceptions to ANSI N45.2.5 specified that testing would be performed at the point of discharge. This modification would allow, in the case of two consecutive correlation tests that exceed specification limits, a shift to testing at the point of placement. This is in accordance with the original requirements of ANSI N45.2.5. No reduction in previous commitments has occurred. Reference the following section on the attached pages for additional detail: Appendix II, change 1

A number of additional changes were made for clarification of editorial purposes, or to reflect actual site practice. Details are also provided on the attached pages. No reduction in previous commitments has been made.

GENERAL

1. This document summarizes all the revisions incorporated in the Quality Assurance Program Description (QAPD) Revision 11, dated 5/01/85. Houston Lighting and Power Company (HL&P) in their letter of March 22, 1985, to Mr. L. W. Hurst, Project QA Manager, Bechtel Energy Corporation, informed him of the basis for this revision.
2. "Table of Contents" Section (2 pages) has been revised. These two pages reflect the revision of ten (10) sections of the Manual.
3. The columns labeled "Rev. No." and "Date" on the Table of Contents pages have been deleted since the entire document would be Revision 11 with date 5/01/85.

SECTION QA-I-1

1. Paragraph 1.0, Page 2 of 20:
Added notes "As modified by Positions" and "see Appendix II, Note 24" to ANSI N45.2.6 - 1973 and R.G. 1.58 (Rev. 0, 8/73).
2. Paragraph 1.0, Page 2 of 20, line 28:
Deleted: "drawings related to quality". Added: "other site specific documents related to quality".
3. Paragraph 3.1, line 4:
Deleted: "Corporate Engineering and Consulting Services". Added: "Corporate and Consulting Engineering".
4. Paragraph 3.1, Page 4 of 21, lines 3 and 4:
Deleted: "Quality Program". Added: "Nuclear Quality Assurance Program Manual".
5. Paragraph 4.1, lines 6 and 7:
Deleted: "company-wide. Added: "for the South Texas Project".
6. Paragraph 4.2, Page 4 of 20:
Changed to read " . . . develop and control Ebasco instructions, procedures . . ."
7. Paragraph 4.2, Page 5 of 20:
Added Paragraph 4.2.10, "Standard Site Procedures for the South Texas Project".

SECTION QA-I-1 (Continued)

8. Table I-1.2:

- a. Added: Last column titled "Standard Site Procedures (SSP-)", and Procedures -1 and -2 corresponding to Criterion V and IX respectively.
- b. Under column titled "Site Quality Assurance Instructions (QAI-)", added Procedure -024 corresponding to Criterion XIV and deleted Procedure -016 corresponding to Criterion XVII.

9. Table I-1.3, Pages 13, 14, and 20 of 20:

On page 13 of 20, deleted QAI-016, "Control of Site Quality Records".
On page 14 of 20, added QAI-024 "System Turnover".
On page 20 of 20, added SSP-1 and SSP-2 under "Standard Site Procedures (SSP)".

SECTION QA-I-2

1. Paragraph 2.1, line 10:

Deleted: "Corporate Engineering and Consulting Services". Added: "Corporate and Consulting Engineering".

2. Paragraph 2.2, lines 2 and 3:

Deleted: "Corporate Engineering and Consulting Services". Added: "Corporate and Consulting Engineering".

3. Paragraph 3.1.1.1, lines 12, 13 and 14:

Added: " . . . and the Standard Site Procedures, when applicable . . . ".

4. Paragraph 3.1.1.2.1:

(i) Page 5 of 13:

- a. Added: "When applicable, review the Standard Site Procedures prior to the Quality Program Site Manager's approval and their implementation".
- b. Added: " . . . , and distribute the Standard Quality Assurance Procedures".

(ii) Page 6 of 13, line 20:

Inserted after " . . . Quality Control Procedures, . . . " the following:
" . . . implementation of applicable Standard Site Procedures, . . . "

5. Paragraph 3.1.2(d), Page 7 of 13, line 1:

Added: "Corporate" before Trend Analysis Programs.

SECTION QA-I-2 (Continued)

6. Paragraph 4.1.1, lines 4, 5 and 6:

Revised to read: "Additionally, the Ebasco Construction Manager shall approve the Standard Site Procedures. The Ebasco Construction Manager has stop work authority."

7. Paragraph 6.0, Page 13 of 13:

Figure I.2-2 has been revised. Added box: "NDE Laboratory Supervisor and Staff".

SECTION QA-I-6

Paragraph 6.1.6, line 1:

Deleted the words "disposing of" and added in their place "superceding".

SECTION QA-III-1

1. Paragraph 2.4:

The entire paragraph has been deleted. Added new paragraph 2.4, as shown.

2. Paragraph 3.7:

Entire paragraph has been added.

3. Paragraph 4.1.2, lines 2 and 3:

Revised to read: "... destroyed or shall be clearly marked as "superceded" or "void" to avoid inadvertent use".

4. Paragraph 4.1.4, line 7:

Added item d): "Distribution of Document (Manual Holder No.)".

5. Paragraph 5.0, line 1:

Inserted after "... Quality Assurance Procedures" the following:
"... and the Standard Site Procedures ...".

SECTION QA-III-2

1. Paragraph 2.2, lines 3 and 4:

Deleted "Standard Quality Procedures" and added "Standard Site Procedures".

2. Paragraph 2.3:

Entire paragraph has been revised.

SECTION QA-III-2 (Continued)

3. Paragraph 2.4, lines 3 and 4:

Added " . . . and the distribution of . . . Procedures".

4. Paragraph 3.3.2:

- a. Lines 1 and 2:

Inserted after "Quality Assurance Instructions" the following: "and Standard Quality Assurance Procedures . . .".

- b. Line 4:

Inserted after " . . . book form" the following: " . . . by the Quality Assurance Site Supervisor".

- c. At the end of the paragraph, added "Receipt acknowledgements shall be maintained for the latest revision".

SECTION QA-III-6

1. Paragraph 2.1:

Deleted the second sentence in its entirety. Added "The person identifying . . . Nonconformance Report".

2. Paragraph 2.3 has been revised. Revised paragraph now appears as 2.2.

3. Previous Paragraph 2.2 is renumbered as Paragraph 2.3.

4. Replace 2.5, line 4:

Replace the word "Procedures" with "Instructions".

SECTION QA-III-7

1. Paragraph 2.7:

- a. Deleted the words "or nonconformances" at the end of the first sentence.

- b. Rest of paragraph 2.7 has been revised in its entirety.

2. Paragraph 2.9, lines 4 and 6:

Replaced the word "nonconformances" to read "deficiencies and nonconformances".

3. Paragraph 3.2, line 7, and Paragraph 4.0, line 9:

Replaced the words "successively higher" by "appropriate".

SECTION QA-III-7 (Continued)

4. Paragraph 5.2, lines 1 and 2:

Replaced "Quality Findings Reports (QFRs)" with "Standard Deficiency Reports (SDRs)".

SECTION QA-III-12

1. Paragraph 2.1, line 8:

Replaced the words "performance of tests" with "verification that tests are performed".

SECTION QA-III-14

1. Paragraph 5.1:

a. Lines 3 and 4:

Inserted after "... placed in their permanent ..." the following: "... or staged ...".

b. Line 8:

Inserted after "If the permanent location ..." the following: "... or the area in which the item is staged ...".

APPENDIX II

1. Exceptions to ANSI N45.2.5 - 1974:

Lines 16 through 23 of item 1 have been revised in their entirety.

2. Exceptions to ANSI N45.2.6 - 1973:

This exception has been added.

Instructions for updating of the manual.

Remove

1. Letter from G. W. Oprea, Jr.
(HL&P) to R. D. Martin (NRC)
dated March 4, 1985, and
attached description of changes.
2. Part A, Revision 10, Cover Sheet.
3. Part A, Revision 10.
4. Part B, Revision 10, Cover Sheet.
5. Part B, Revision 10.
6. Part C, Revision 10, Cover Sheet.
7. Part C, Revision 10.

Insert

1. Letter from J. H. Goldberg
(HL&P) to R. D. Martin (NRC)
dated April 30, 1985.
2. Part A, Revision 11, Cover Sheet.
3. Part A, Revision 11.
4. Part B, Revision 11, Cover Sheet.
5. Part B, Revision 11.
6. Part C, Revision 11, Cover Sheet.
7. Part C, Revision 11.