Portland General Electric Company

Bart D. Withers Vice President

April 29, 1985

Trojan Nuclear Plant
Docket 50-344
License NPF-1

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

Dear Mr. Martin:

Submittal of Quality Assurance Program
in Accordance with 10 CFR 50.54(a)(3)

In accordance with 10 CFR 50.54(a)(3), enclosed is a current copy of the Nuclear Quality Assurance Program (NQAP) for the Trojan Nuclear Plant. This copy is updated through Revision 10. It has been determined that the changes made in Revision 10 do not reduce the commitments in the Quality Assurance program description contained in Revision 9.

Sincerely,

B D Withers

Bart D. Withers
Vice President
Nuclear

BDW/FCG
Enclosures: PGE-8010, Revision 10;
Safety Evaluation (GAI-95NS-85M)
c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy wo/enclosures

G001 1/1

8-40-265

Attachment to letter, B. D. Withers to
John B. Martin, 4-29-85 (re Rev. 10, PGE-8010)

INTER-OFFICE COMMUNICATION

PORTLAND GENERAL ELECTRIC COMPANY

Date April 11, 1985
GAI-95NS-85M
(Nuclear Support)

To ✓J. W. Lentsch

From F. C. Gaidos

Subject QA Program Revision LDCR Review and Approval

Reference: GAI-49T-85M dated March 5, 1985.

Attached for approval is proposed Revision 10 to the PGE Nuclear Quality Assurance Program. The QA Department has completed an initial review of comments received from cognizant PGE organizations resulting from the referenced memorandum.

The QA Department has determined, pursuant to 50.54(a)(3), that certain changes do reduce the commitments in the program description previously presented to the NRC as Revision 9 and will require NRC approval prior to implementation. These changes will be processed as Revision 11 following NRC approval.

Please note that Chapter 9.0 and Figure 1.0-2 were not changed in Revision 10 but are included in this LDCR submittal for cohesion throughout the document.

JLD CHB

JLD/CHB:mih
Attachment: LDCR and Safety
Evaluation (17 pages with
attached Draft Rev. 10)

c: J. G. Schweitzer (w/LDCR and SE, only)
NQAD File (w/LDCR, SE, and Draft
Rev. 10)

QARID No. N/A

TROJAN NUCLEAR PLANT SAFETY EVALUATION CHECK LIST

PGE Nuclear Quality Assurance — Department

LDCR 85-05 — Identification Number

Part A

1.0 **Identification and Description of Change** Revision 10 to Nuclear Quality Assurance Program (PGE-8010).

2.0 **Criteria for Determining the Need for Evaluation**

Does this change, test, or experiment represent:

2.1 10 CFR 50.59

Yes ____ No X — A change to the Trojan Facility as described in the FSAR?

Yes X No ____ — A change to procedures as described in the FSAR (ie, does it change an FSAR described system operation or administrative control, or change a system operation assumed in an accident analysis?)

Yes ____ No X — A test or experiment which operates the facility in a manner not described in the FSAR and/or which could have an adverse effect on reactor safety?

Yes ____ No X — A change to the Technical Specifications (Appendix A or B of the Trojan Nuclear Plant License) or the license itself? If yes, a detailed safety evaluation and NRC approval is required prior to implementation.

2.2 Environmental Technical Specification 3.1

Yes ____ No X — A change to Trojan procedures or design which could effect the environment?

2.3 10 CFR 50.54(a)(3)

Yes X No ____ — A change to the Nuclear Quality Assurance Program.

Yes X No ____ — A deviation from the Nuclear Quality Assurance Program description.

2.4 10 CFR 50.54(q)

Yes ____ No X — A change to the RERP or emergency response equipment or procedures described in the RERP?

2.5 10 CFR 50.54(p)

Yes ____ No X — A change to the Security Plan or Safeguards Contingency Plan or to equipment or procedures described in the Security Plan or Safeguards Contingency Plan?

Indicate the sections of the FSAR, Technical Specifications, QA Program, RERP, Security Plan, or Safeguards Contingency Plan reviewed FSAR 13.0; Technical Specification 6.0; RERP; Security Plan and Safeguards Contingency Plan.

Signature — Date

If the answer to all of the above questions is "no", an evaluation is not required. Otherwise, complete the applicable sections of Part B.

LDCR 85-05
Identification No.

Part B

3.0 Evaluation

3.1 10 CFR 50.59 Evaluation

Yes ____ No X Will the probability of an accident previously evaluated in the FSAR be increased?

Yes ____ No X Will the consequences of an accident previously evaluated in the FSAR be increased?

Yes ____ No X May the possibility of an accident, which is different than any already evaluated in the FSAR, be created?

Yes ____ No X Will the probability of a malfunction of equipment important to safety, previously evaluated in the FSAR, be increased?

Yes ____ No X Will the consequences of a malfunction of equipment important to safety, previously evaluated in the FSAR, be increased?

Yes ____ No X May the possibility of a malfunction of equipment important to safety, different than any already evaluated in the FSAR, be created?

Indicate FSAR sections reviewed Entire FSAR.

Yes ____ No X Will the margin of safety, as defined in the basis of any Technical Specification, be reduced?

Indicate Technical Specification basis sections reviewed: Not applicable.

If the answer to all of the questions is "no", provide a statement justifying the conclusion: These changes are administrative in nature and do not affect structures, systems, or components in the FSAR.

Based on the above, an unreviewed safety question ___ is X is not involved.

/
Signature Date

LDCR 85-05
Identification No.

3.2 Environmental Evaluation (ETS 3.1)

Yes ____ No X Will an increase occur in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by the NRC Staff's testimony to the ASLB?

Yes ____ No X Will an increase occur in any adverse environmental impact previously evaluated in supplements to the FES?

Yes ____ No X Will an increase occur in any adverse environmental impact previously evaluated in Environmental Impact Appraisals?

Yes ____ No X Will an increase occur in any adverse environmental impact described in any decision of the ASLB?

Yes ____ No X Will a change occur in the types or amounts of effluents?

Yes ____ No X Will an adverse environmental impact not previously evaluated occur?

If the answer to all of the above questions is "no", provide a statement justifying the conclusion: Not applicable.

Based on the above, an unreviewed environmental question ___ is X is not involved.

3.3 Quality Assurance Program Evaluation [10 CFR 50.54(a)(3)]

Yes ____ No X Will any commitments in the Nuclear QA Program be reduced?

Indicate QA Program sections reviewed: Entire QA Program.

If the answer to the above question is "no", provide a statement justifying the conclusion: See Attachment B for detailed safety evaluation.

Based on the above, a reduction in commitments in the QA Program description previously accepted by the NRC ___ is X is not involved.

LDCR 85-05
Identification No.

3.4 Radiological Emergency Response Plan Evaluation [10 CFR 50.54(q)]

Yes ____ No X Will any deviation from the Trojan RERP be created?

Indicate RERP sections reviewed: Entire RERP.

If the answer to the above question is "no", provide a statement justifying the conclusion: An Appendix F was added to the QA Program to provide a better definition of QA Program commitments to the RERP.

Based on the above, a decrease in the effectiveness of the RERP, a deviation from 10 CFR 50.47(b), or Appendix E to 10 CFR 50 ___ is X is not involved.

3.5 Security Plan Evaluation [10 CFR 50.54(p)]

Yes ____ No X Will any deviation from the Trojan Security Plan be created?

Indicate Security Plan sections reviewed: Entire Security Plan not affected.

If the answer to the above question is "no", provide a statement justifying the conclusion: Not applicable.

Based on the above, a decrease in the effectiveness of the Security Plan ___ is X is not involved.

3.6 If the conclusion to any of the above is positive, NRC approval is probably required prior to implementation and a detailed evaluation should be prepared to support the acceptability of the change (see Attachment B).

J L Dunlop 4-11-85
Signature Date

SAFETY EVALUATION

Summary

This revision is administrative in nature. It does not lessen the review and approval authority for quality-related activities nor provide any relaxation of the QA Program or administrative controls such that any impact on accident occurrence probability, accident consequences, environmental considerations, or plant safety margins could occur. Since these changes are not equipment-related, no new accidents could be created. No weakening of the Operations Phase QA Program commitments previously made for safety-related components will occur. Therefore, no unreviewed safety questions will result from this change.

DETAILED SAFETY EVALUATION OF QA PROGRAM CHANGES

Policy Statement

A statement was added which prohibits deviations to the QA Program which are not in accordance with 10 CFR 50.54 and not approved by the QA Manager and the Vice President, Nuclear. Also, clarifications were made to emphasize PGE's commitment to follow the guidance of Regulatory Guides and ANSI Standards consistent with the intent of language used throughout the program text. PGE has developed a QA Program and implementing procedures to meet the intent of regulatory guidelines.

Environmental qualified components have been identified as a quality-related area controlled by the QA Program.

These changes will not affect PGE's present method of implementing the QA Program and are not considered a reduction in commitments.

Introduction

A statement was added here and in Section 2.2.2.1 which requires the Nuclear Division and interfacing support organizations to maintain and follow procedures which implement the QA Program.

In addition, a reference change from SPI 200-59 to NDP 700-3 was made to facilitate the consolidation and control of nuclear-related procedures within the Nuclear Division.

Also, a clarification was made regarding PGE's commitment to follow the guidance of Regulatory Guides and ANSI Standards consistent with the intent of language used throughout the program text.

These changes will not affect PGE's present method of implementing the QA Program and are not considered a reduction in commitments.

Chapter 1.0 - Organization

In Section 1.1, "training" was added to the list of quality-related activities controlled by the QA Program to strengthen the QA Program commitments. Also, various reference changes from SPIs to NDPs were made to facilitate the consolidation and control of nuclear related procedures within the Nuclear Division.

Additional clarifications were made regarding responsibilities of the QAD, TNOB, and Vice President, Nuclear in the evaluation of overall adequacy and effectiveness of the QA Program and the review and implementation of the audit program. The statement that the QAD has membership in the TNOB was deleted since this is specified in the Technical Specifications 6.5.2.2.

These changes will not affect PGE's present method of implementing the QA Program and are not considered a reduction in commitments.

Throughout the Chapter, clarifications and additions were made to the responsibilities of the QA Engineering Branch Managers; the General Manager, Technical Functions; the Manager, NPE; the Manager, NSRD; the plant General Manager; the General Manager, Purchasing; the General Manager, Environmental & Analytical Services; the Senior Vice President and Chief Financial Officer; and the plant QAS. None of these changes are considered as reductions in QA Program commitments.

A change in terminology from QNs to NCARs was made to consolidate the various processes for identifying deficiencies under one standard system which will improve and strengthen the QA Program.

The section of the QA Program describing the Material Review Board and its responsibilities was deleted from this Chapter. The Material Review Board is no longer recognized as a formal board. However, the responsibilities of the plant QAS and the plant Engineering Supervisor to review NCR dispositions and to recommend approval of appropriate corrective action including possible design changes is still required.

This is an administrative change and is not considered a reduction in QA Program commitments.

A number of changes were made throughout text and charts in the Chapter to reflect reorganizational changes and title changes which are administrative in nature and are not considered a reduction in QA Program commitments.

Chapter 2.0 - Quality Assurance Program

A new Appendix F titled "QA and Administrative Controls for Emergency Planning" was added to the Chapter to provide clarification of the QA Program's application to Emergency Planning. The change improves the definition and strengthens the QA Program commitments to be applied to the area of Emergency Planning.

Editorial changes, additions, and clarifications were made to Appendix A (Fire Protection); Appendix B (Packaging Radioactive Material for Transport); Appendix C (Radioactive Waste Management Systems); Appendix D (Standard Technical Specification); and Appendix E (Security). Also, a paragraph was added to Appendix B describing the QA Program commitments for Type A packages and additional QA Program chapters that were identified as being applicable to the area of packaging radioactive material for transport. These changes are considered improvements in the QA Program.

An editorial change was made to Section 2.2.1 to reflect the recent Technical Specification change that incorporated radiological requirements previously in Appendix B of the ETS into Appendix A of the STS.

In Section 2.4, the responsibility for TNOB review of changes to the QA Program prior to issuance has been deleted. The QA Department has been delegated the responsibility for the QA Program and makes the initial determination whether changes would reduce the QA Program commitments. The Chairman and Vice Chairman of the TNOB will continue to review and approve the QA Program prior to issuance via the LDCR process, and the TNOB Staff will review the safety evaluation (reduction in commitments evaluation) for changes to the QA Program after issuance.

This change is not considered a reduction in QA Program commitments since there are no regulatory requirements for an independent review of QA Program changes prior to issuance.

A reference change from SPI 200-16 to NDP 100-9 was made to facilitate the consolidation and control of nuclear related procedures within the Nuclear Division which strengthens the QA Program commitments. Also, a clarification was made that only Nuclear Division procedures and PGE interfacing organization procedures are used to control Nuclear Division activities and is not considered a reduction in QA Program commitments.

An organizational title change for Management Support Services Department and a deletion of the TNOB as a support organization was made in Section 2 2.2.3 for clarification. This change is not considered a reduction in QA Program commitments.

Changes were made to more correctly define responsibility of the originator for requesting the QA Department to perform supplier evaluations as necessary during the preparation of procurement documents.

Also, a change was made to indicate that the QA Department reviews and concurs with procurement documents and Material Receiving Instructions as part of the procurement process. These changes are administrative in nature and are not considered a reduction in QA Program commitments.

An additional responsibility for the maintenance of the quality-related items lists was assigned to NPE and is considered an editorial improvement in the QA Program.

Chapter 3.0 - Design Control

An extensive rewrite of this chapter was performed to identify QA Program controls for alternate methods of design changes such as Temporary Modifications, Plant Setpoint Changes, and Spare Parts Equivalency Evaluation Reports. Also, Section 3.2.5 was added to describe a new design change process called Plant Configuration Changes. This process will enable minor changes to be made to the plant in a more expeditious manner. Although this will improve the process of minor changes to the plant, reviews of the scope of the proposed design will still be required by NPE and Plant Engineering to assure that the change does not alter safety-related structures, systems, or components. In addition, design and safety evaluations will be performed by knowledgeable plant personnel, NPE personnel or a consulting engineer under the cognizance of NPE. These, as well as additional design control measures for the PCC process, will assure proper implementation of design changes in accordance with present QA Program commitments.

These changes are not considered a reduction in QA Program commitments.

Other editorial and format changes were made to Section 3.2.1 through 3.2.4 and 3.2.9 to provide a clearer definition of the QA Program commitments in the general area of design control, design change initiation, design process for RDCs, and detailed construction package controls. Under Section 3.2.2, an administrative change was made to allow the Manager, NPE, or the plant Engineering Supervisor to approve the initial RDC. This is not considered a reduction in QA Program commitments since the plant Engineering Supervisor is the primary plant engineer involved in the design control process. Another change made in Section 3.2.3 deletes the NSRD review and concurrence of RDC safety evaluations prior to review by the PRB. This change streamlines and simplifies the design control process by eliminating an unnecessary review during the initial stages of the RDC process. Presently, the RDC safety evaluation is reviewed by the PRB prior to implementation and by the TNOB staff under the cognizance of NSRD. There is no regulatory requirement for NSRD's review of RDC safety evaluations prior to issuance and, therefore, this change is not considered a reduction in QA Program commitments.

Section 3.3 was rewritten to provide a clarification of responsibilities for controlling design changes and as-built documentation within NPE, the responsible and knowledgeable organization for verifying proper installation of the DCP and for revising any Top Documents affected by a modification. This change simplifies the design change documentation control process described in the QA Program and is not considered a reduction in commitments.

Chapter 4.0 - Procurement Document Control

This QA Program Chapter has been revised to improve clarity. Clarifications have been added concerning the use of Material/Services Requests (MSRs) and Material Receiving Instructions (MRIs) as parts of the requisition package. The MSR provides detailed technical requirements. The MRI provides any special receipt inspection/testing, or storage/handling requirements. The use of these documents serves to improve the technical accuracy and the quality assurance of purchase orders provided to vendors. For onsite preparation of procurement documents, the originator of the request, rather than the Material Control Supervisor, is responsible for the completeness of the requirements specified since the originator is the most cognizant person involved in the procurement process. A clarification was added concerning the subsequent reordering of items under a Spare Parts Repeating Requisition (SPRR). A requirement was added that local purchase orders not be used where 10 CFR 21 is applicable.

In Section 4.2.2, the purpose and use of Spare Parts Equivalency Evaluation Reports (SPEERs) was clarified. Also, in Section 4.3.1, the purpose of an engineering evaluation for standard design/off-the-shelf parts was clarified.

In Section 4.3.2, a duplication of commitments describing the preparation and approval of procurement documents by NPE was deleted. Also, in Section 4.4, a duplication of commitments describing the evaluation of deviations to procurement specifications and subsequent actions was deleted.

These changes are not considered a reduction in QA Program commitments.

Chapter 5.0 - Instructions, Procedures, and Drawings

This QA Program Chapter has been revised for clarity and removal of redundant material. Detailed requirements concerning the review, approval, distribution, and revision of procedures and drawings have been moved to QA Program Chapter 6.0 (Document Control). No requirements were deleted or reduced in commitment. A requirement has been added to this Chapter that support organizations performing work onsite must comply with existing plant procedure or provide instructions and procedures which describe the quality-related activities they perform.

These changes are not considered a reduction in QA Program commitments.

Chapter 6.0 - Document Control

This QA Program Chapter has been extensively revised to incorporate provisions previously contained in Chapter 5.0 (Instructions, Procedures, and Drawings). No deletion or reduction in requirements occurred.

Additions were made to provide QA commitments for controlling lower tier procedures and for requiring PGE support organizations to perform periodic procedural reviews.

These changes are not considered a reduction in QA Program commitments.

Chapter 7.0 - Control of Purchased Material, Equipment, and Services

This QA Program Chapter has been revised to improve clarity. It also includes the responsibilities of the QA Department and the Purchasing & Materials Management Department in administering the Evaluated Contractor and Supplier List (ECSL). The QA Program has been strengthened by the QA Department's assumption of the responsibility for adding or removing contractors, suppliers, or service organizations from the ECSL and maintaining it current. Receipt inspection requirements have been clarified to indicate that special receiving instructions are not always required and to clarify the receipt inspection process.

These changes are not considered a reduction in QA Program commitments.

Chapter 8.0 - Identification and Control of Material, Parts, and Components

This QA Program Chapter has been revised to improve clarity and to strengthen some provisions. A requirement has been added to transfer required identification markings if a part is subdivided. The use of material receipt instructions and any special receiving instructions is clarified. A requirement has been added to specify that a Storeroom Material Issue Slip give the location of installation for an item by MR, PCC, or RDC number. This will improve the forward traceability of storeroom material.

These changes strengthen the QA Program commitments.

Chapter 9.0 - Special Processes

No changes have been made to the QA Program Chapter.

Chapter 10.0 - Inspection

Editorial changes have been made throughout the Chapter and clarifications have been added to specify that inspection requirements are applicable to both items and activities.

These changes are not considered a reduction in QA Program commitments.

Chapter 11.0 - Test Control

Section 11.2.1 (Page 11-2) subheading h. was changed to clarify the requirement. When a valve or electrical system requires a checklist sheet to achieve the desired test configuration, a checklist sheet must also be used to return the system to normal. This change is consistent with commitments in PGE-to-NRC letter dated October 26, 1982 for documenting the return to service of all safety-related equipment that is disabled during a test and strengthens the QA Program commitments. Also, editorial changes have been made which do not affect QA Program commitments.

This change strengthens the QA Program commitments.

Chapter 12.0 - Control of Measuring and Test Equipment and Installed Instrumentation

This QA Program Chapter was revised to clarify the distinction between portable measuring and test equipment and installed plant instrumentation. The latter now is specifically included in the QA Program. The requirements for onsite and offsite control programs were consolidated for consistency and to eliminate redundancy. Documentation of the calibration of portable measuring and test equipment and installed instrumentation was broadened to include the use of the calibration due date as an acceptable method.

This change is not considered a reduction in QA Program commitments.

Chapter 13.0 - Handling, Storage, and Shipping

This QA Program Chapter has been revised to improve clarity and useability. Specific examples of initial procurement documents have been removed without altering the requirement that the documents must include applicable packaging and handling requirements. Section 13.2.2.1 on Plant Storage has been revised to indicate that special receiving instructions are not always applicable. In those instances where a supplier's special requirements are provided, the verification and documentation of the requirements is performed by receipt inspection personnel. The requirement for handling equipment procedures has been clarified. For offsite receipt of quality-related items, the designation of the person responsible for the preparation of receiving, storage, and handling requirements has been clarified to specify a qualified PGE person vice the cognizant supervisor. This allows the person most knowledgeable of the equipment characteristics to specify the detailed requirements. The specified requirements continue to be reviewed by the Quality Assurance Department.

This change is not considered a reduction in QA Program commitments.

Chapter 14.0 - Inspection, Test, and Operating Status

This QA Program Chapter has been revised to improve clarity and strengthen the requirements. A new General section has been added to specify the use of procedures to identify the status of inspections and tests performed on individual items and to identify nonconformances. The control of equipment removed from service has been strengthened by requiring the prior permission of designated operations personnel. This is to ensure that the removal will not have an adverse effect on plant safety. A clarification to receipt inspection procedures was made to indicate receipt inspection status of an item on the purchase order documentation. In most instances, this is a more practical method than requiring the placement of identification on the quality-related item itself. The commitment to identify the receipt inspection status remains.

This change strengthens the QA Program commitments.

Chapter 15.0 - Nonconforming Material, Parts, or Components and Corrective Action

This QA Program Chapter has been extensively revised. The process for the identification, reporting, and correction of nonconforming activities has been moved to Chapter 16.0 of the QA Program. The Chapter title has been changed to "Nonconforming Material, Parts, or Components and Corrective Action" to more accurately reflect the Chapter commitments. A section by section description and evaluation of the revised Chapter follows:

Section 15.1 - Purpose

The statement concerning nonconforming activities has been deleted. These activities are described in Chapter 16.0 of the QA Program.

This change is not considered a reduction in the QA Program commitments.

Section 15.2.1 - General

This section has been revised to indicate that a single Nuclear Division Procedure is used for the identification, control, and disposition of nonconforming items. This higher-level procedure serves to clarify and strengthen the program. This section also clarifies the method of control for a nonconforming item which is installed in the plant. An evaluation by engineering supervision and the Shift Supervisor is required to determine that there is no adverse affect on the safe operation of the plant. The requirement to clearly identify nonconforming items has been clarified and expanded to require the use of other methods when tagging is not feasible. An additional requirement has been added to perform and document a failure analysis when deemed necessary by the plant staff.

These changes are not considered a reduction in the QA Program commitments.

Section 15.2.2 - Maintenance Requests

This is a new section which prescribes the use of a Maintenance Request (MR) for restoring a nonconforming item to its original design requirements through a rework process. Requirements for post maintenance testing and work review are included.

This change clarifies and strengthens the QA Program commitments.

Section 15.2.3 - Nonconformance Report (NCR)

This section was formerly numbered 15.2.2. It also includes the provisions of the former Section 15.2.3 (Material Review Board). The Material Review Board is no longer recognized as a formal board. However, review of NCR dispositions, including appropriate corrective action recommendations by the plant QA Supervisor and the Plant Engineering Supervisor is still required. This is an administrative change and is not considered a reduction in QA Program commitments.

This section also has been revised to improve clarity and eliminate redundant material. Several requirements have been added. NCRs must be evaluated to determine if an unreviewed safety question exists, to determine if a significant condition adverse to quality exists, or if a substantial safety hazard reportable under 10 CFR 21 exists. Disagreements regarding NCR disposition are reported to the plant General Manager for resolution. QA personnel may suspend safety-related activity, with the exception of reactor startup or power generation, which will result in a nonconformance. These additions strengthen the QA Program.

These changes are not considered a reduction in QA Program commitments.

Section 15.2.4 - Evaluating and Reporting Defects

This section was formerly titled Quality Notices which has been moved to Chapter 16.0 of the QA Program. The revised section includes the material formerly included in Section 15.2.5. This section has been revised to improve clarity. Reference is now made to a Nuclear Division Procedure which prescribes the documentation and control of defects reported by PGE employees. A provision has been added for the TNOB to perform a final review of the evaluation of a reported defect to determine reportability.

These changes are not considered a reduction in QA Program commitments.

Section 15.3 - Nonconformance Control Program Offsite

This entire section has either been incorporated into Section 15.2 or the material has been moved to QA Program Chapter 16.0. The inclusion into Section 15.2 of the requirements concerning nonconforming material, equipment, or parts eliminates redundancy. The requirements concerning nonconforming activities are better covered in QA

Program Chapter 16.0. This change is editorial in nature. No requirements have been reduced or eliminated.

This change is not considered a reduction in QA Program commitments.

Chapter 16.0 - Nonconforming Activities and Corrective Actions

This Chapter has been extensively revised. The QA Program for onsite and offsite has been consolidated to ensure consistency and to eliminate redundancy. The program for identification and correction of nonconforming activities as previously contained in QA Program Chapter 15.0 has been incorporated into this chapter. Corrective action requirements for nonconforming material, parts, and components is still contained in Chapter 15.0. The Chapter title has been changed to "Nonconforming Activities and Corrective Action" to more accurately reflect the Chapter commitments and a reference to the NDP on nonconforming activities has been included in the Chapter. A section by section description and evaluation of the revised Chapter follows:

Section 16.1 - Purpose

This section has been revised for clarity.

This change is not considered a reduction in QA Program commitments.

Section 16.2.1 - General

This section describes a revised system for controlling nonconforming activities through the use of Nonconforming Activity Reports (NCARs). This system consolidates the previous methods whereby the QA Department issued LOOPS and QAFRs and the plant QA Supervisor utilized QNs. An NCAR consolidates into one document the nonconforming activity, the corrective action, the reportability evaluation, the approval of the actions taken for resolution, and verification of corrective action. Previous requirements for an annual trend evaluation to be provided to the TNOB and stop work authorization are retained.

These changes are not considered a reduction in QA Program commitments.

Section 16.2.2 - Corrective Action Associated with Nonconforming Activity Reports

This section has been extensively revised to describe the administrative details of processing NCARs by both the QA Department and the plant QA Supervisor. It clarifies the requirements for an evaluation to determine if a significant condition adverse to quality exists or if the nonconformance is reportable. Also required is a determination of the root cause of the nonconformance. Corrective

action responses are required within 30 days. The NCAR system retains the previous control elements of the LOOP/QN programs in that supervisory approval of proposed corrective action is required. The QA organizations continue to verify implementation of the corrective actions taken.

These changes strengthen the QA Program commitments.

Section 16.2.3 - Corrective Action Associated with Reportable Occurrences and Abnormal Environmental Occurrences

This section was previously numbered 16.2.5. This section has been revised to include the reporting of events required by 10 CFR 50.72 and 10 CFR 50.73. The previous Sections 16.2.3 and 16.2.4 have been incorporated in Section 16.2.2. These charges are editorial in nature. All previous commitments have been retained.

These changes involve no change in QA Program commitments.

Section 16.3 - Corrective Action Program Offsite

This entire section has been consolidated with the onsite program described in Section 16.2. This consolidation enhances the administration of a consistent corrective action program. No program commitments for offsite activities were reduced.

This change is not considered a reduction in QA Program commitments.

Chapter 17.0 - Quality Assurance Records

Section 17.2.1 (General) has been revised for clarity. New Sections 17.2.3 (Categories) and 17.2.4 (Records Administration) have been added. Section 17.2.3 provides a definition of lifetime and nonpermanent records. Section 17.2.4 better defines the requirements for the preparation, filing, and storage of records. This section also consolidates the requirements for filing and indexing of records for both onsite and offsite activities previously contained in Sections 17.3.2 and 17.4.4. With the expansion of this QA Program Chapter, the requirements for QA records are better defined.

These changes are not considered a reduction in QA Program commitments.

Chapter 18.0 - Audits

This QA Program Chapter has been edited and revised to improve clarity. Some specific requirements have been added. Auditors must be qualified under procedures meeting the guidelines of ANSI N45.2.13. Audit reports must be prepared and distributed within 30 days of the post-audit conference. Copies are provided to the TNOB Chairman and members of the TNOB QA Subcommittee. The audited organization must respond to any audit findings within 30 days of the issuance of the audit report. Except for the provision regarding the TNOB QA Subcommittee, the requirements are not new. They have been added to the QA Program for completeness and to strengthen the program.

These changes are not considered a reduction in QA Program commitments.

GLOSSARY

Various additions, deletions, and clarifications have been made to make this section consistent with changes made to the QA Program Chapters. The changes are editorial in nature.

These changes are not considered a reduction in QA Program commitments.

Supplement 1 - PGE Procedure Indexes

This section has been updated to provide a current listing of procedures illustrative of the quality assurance activities of the off-site support organizations and the plant QA Staff. The changes are editorial in nature.

These changes are not considered a reduction in QA Program commitments.

Supplement 2 - PGE Exceptions to NRC Regulatory Guides and ANSI Standards Imposing QA Program Requirements

The Summary and Description of Exceptions section for each Regulatory Guide has been revised slightly to clarify PGE's commitment to follow the guidance of Regulatory Guides and ANSI Standards. PGE has developed a QA Program and implementing procedures to meet the intent of the regulatory guidelines. The exceptions to Regulatory Guide 1.38 (Rev. 2) have been clarified concerning the use of classification levels to describe the packaging, shipping, receiving, storage, and handling of safety-related items. New fuel storage requirements have also been clarified.

These changes are not considered a reduction in QA Program commitments.

Nuclear Quality Assurance Program
Instruction Sheet for Revision 10

The following information is furnished as a guide for the insertion (and removal) of material for this revision.

All sheets are identified as Revision 10. Those pages which do not have a Revision 10 notation in the left margin were retyped either because their text was repositioned, or for ease in inserting an entire revision rather than scattered sheets. The Change Page (Form Q101E, Rev. 6) and the notebook dividers should be retained. Note that a new divider, APP. F, is included with this revision. All other sheets (except the original transmittal or transfer to you of the manual) should be removed and destroyed.

The arrangement of your manual and its contents should be as shown on the Table of Contents; i.e., the transmittal letters/instruction sheet are to be placed in the back of the binder after you have noted the incorporation of Revision 10 on the Change Page, and followed the instructions for return of the receipt portion of the transmittal letter.