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May 28, 1985
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File No.: G9.15

Mr. George W. Knighton, Chief
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U. S. Nuclear Regulatory Commission
Washington, DC 20555

South Texas Project
Units 1 & 2
Docket Nos. STN 50-498, STN 50-499
Responses to NRC Request
For Additional Information
on Quality Assurance

Dear Mr. Knighton:

Your letter dated April 1, 1985 requested additional information on the South Texas Project Electric Generating Station Operations Quality Assurance Plan (FSAR Section 17.2).

We have prepared the attached responses to that request, and based on discussions with the NRC-NRR reviewer believe that these responses are satisfactory.

These responses will be included in the next available FSAR amendment.

Very truly yours,

M. R. Wisenburg
Manager, Nuclear Licensing

MAM/yd
Attachment: Responses to Questions
260.48N - 260.57N

W2/NRC3/n

A001
1/1

cc:

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260.48N

In FSAR Amendment 42, the response to Question 260.10N refers to Section 17.2.3. Section 17.2.3 does not appear to address the assurance of geometric and fur tional compatibility or compatibility with processes and environment during the operations phase. Clarify

Response:

FSAR Section 17.2.3.2, Application Review, addresses review for application suitability; FSAR Section 17.2.3.3, Design Process, addresses material compatibility and FSAR Section 17.2.3.1 addresses procedural control of the design process. These sections establish controls and reviews necessary to assure geometric and functional compatibility and compatibility with processes and environment during the operations phase.

260.49N

In FSAR Amendment 42, the response to Question 260.11N refers to Section 17.2.3. Section 17.2.3 does not appear to address checking drawings to verify dimensional accuracy and completeness. Clarify

Response:

FSAR Section 17.2.3.1 establishes procedures for checking of drawings. As appropriate, dimensional accuracy and completeness are typical features to be checked.

260.50N

In FSAR Amendment 42, the response to Question 260.35N refers to Section 17.2.2.11. It is assumed that this response related to FSAR Section 17.2.2.10. Section 17.2.2.10 indicates that changes to the QA program, as described in the FSAR, that decrease the level of commitment will be processed in accordance with 10 CFR 50.54(a). Changes should be processed in accordance with 10 CFR 50.54(a) whether or not they decrease the level of commitment. Revise FSAR Section 17.2.2.10 accordingly or justify not doing so.

Response:

The response to Q260.35N should in fact reference FSAR Section 17.2.2.10. FSAR Section 17.2.2.10 will be revised to delete the words "that decrease the level of commitment". Changes which reduce commitments will be submitted prior to implementation and changes which do not reduce commitment will be submitted in accordance with 10 CFR 50.54(a)3. The response to Question 260.35N will be revised to reference the correct section.

260.51N

In FSAR Amendment 42, the response to Question 260.36N states that the question will be answered in a later amendment. Amendment 43 appears to answer this question in note 32 to FSAR Table 3.12-1. This note states that some specific personnel will be qualified "under the guidelines of ANSI N45.2.6-1978, rather than RG 1.8" This would be acceptable if the reference to ANSI N45.2.6-1978 was changed to the regulatory guide endorsing that standard, i.e., RG 1.58, Revision 1 dated September 1980. Change this reference or justify not doing so. Also, it appears that the commitment to RG 1.8 in FSAR Table 3.12-1 should also refer to note 32. Clarify.

Response:

HL&P will comply with RG 1.58, Revision 1. Table 3.12-1 will be revised to correct note 32 and indicate HL&P commitment to this Regulatory Guide for the operations phase. Additionally, the response to Question 260.36N will be updated.

260.52N

FSAR Amendment 43 deleted a number of references in Table 3.12-1 to Chapter 17. Explain the significance of these deletions. Also, footnote 39 in FSAR Table 3.12-1 (Amendment 43) refers to RG 1.39. It appears this reference should be to RG 1.144. Clarify.

Response:

The STP FSAR Table 3.12-1 only references those FSAR Sections which contain a specific reference (by number) to a particular Regulatory Guide. The revision to FSAR Section 17.2 does not reference specific Regulatory Guide's by number unless absolutely necessary. This helps to keep commitments to Regulatory Guides consolidated in Table 3.12-1 which makes the administrative work involved in updating Regulatory Guide commitments easier.

Note 39 of Table 3.12-1 will be revised to reference Revision 1 of RG 1.144.

260.53N

Questions 260.33N and 260.47N address the scope of the HL&P QA program during the operations phase of the South Texas Project. The items listed below, numbered as in 260.33N, reflect staff positions which should be addressed by HL&P.

a.17 Quality Assurance for the piping, supports and valves in the cooling loops of the spent fuel pool cooling and cleanup system is given by a dash in the Quality Assurance Column, indicating that the QA requirements of 10 CFR 50, Appendix B, are not mandatory. The staff position is that the pertinent provisions of Appendix B should be applied to the spent fuel pool cooling system during the operation phase. Commit to meet this position or justify not doing so.

a.28 The response to this item on page Vol. 2, Q&R 17.2-47N per Amendment 42 is acceptable. It appears to have been garbled in note 14 of Table 3.2.A-1 on page 3.2-29a. Clarify.

e.4 The response to this item on page Vol 2 Q&R 17.2-48N per Amendment 42 is acceptable as it addresses the PASS hardware. Identify what QA measures will be applied to the post-accident sampling capability during the operations phase.

e.5 The response to this item on page Vol. 2 Q&R 17.2-48 per Amendment 42 differentiates between the application of 10 CFR 50 Appendix B to the pressurizer PORV status indicators and the pressurizer safety relief valve status indicators. Item IID3 of NUREG-0737 makes no such differentiation, and the staff position is that the pertinent provision of Appendix B should be applicable to the status indicators of both types of valves during the operations phase. Provide such a commitment or justify not doing so.

Response:

a.17 The "dash" for spent fuel pool cooling and cleanup system piping, supports and valves in the cooling loops should be a "B" to indicate that the pertinent provisions of Appendix B will be applied during the operations phase. Table 3.2.A-1 will be revised accordingly.

a.28 Table 3.2.A-1 will be revised to read "The radiation monitoring system components are discussed in Sections 11.5 and 12.3 and include both the safety-related Class 1E monitors and RG 1.97, Category 2, monitors."

e.4 The audit program described in FSAR Section 17.2.18.1 will be applied to post accident sampling capability during operations phase.

e.5 The status indication instrumentation for both the Pressurizer PORVs and SRVs are identified as RG 1.97 category B2 variables. Both status indication systems are purchased to the same criteria of 10 CFR 50 Appendix B and comply with item II.D.3 of NUREG-0737. The design and qualification criteria of category 2 instrumentation is provided in Appendix 7B, Section 7B.3.2.2. Further clarification of both status indication systems is provided in FSAR Sections 5.4.13, 7.5.1, and FSAR Appendix 7A item II.D.3. The pertinent provision of Appendix B will be applied to these indicators during the operations phase. The response to Question 260.47N will be revised to reflect this response.

260.54N

The response to Question 260.45N is acceptable in FSAR Amendment 42. However, the fact that "the applicable QA program for operations (for equipment identified in Notes 3, 4, 6, 23, and 24 of FSAR Table 3.2.B-1) is as discussed in Section 17.2" should be clarified in Table 3.2.B-1. So clarify Table 3.2.B-1 or justify not doing so. This clarification is also required of Table 3.2.B-2 since one set of notes applies to both tables.

Response:

FSAR Section 17.2.2.2 states that the QA Program for operations applies to the safety-related structures, systems and components listed in FSAR Section 3.2. This statement applies to those items which reference notes 3, 4, 6, 23, and 24 of Tables 3.2.B-1 and 3.2.B-2. To clarify the table a statement will be added to each note which indicates that the Operations QA program described in FSAR Section 17.2 applies.

260.55N

Until Amendment 42, FSAR Section 17.2.6.2 included the following commitment:

Maintenance, modification and inspection procedures shall be reviewed by the responsible QA organization to determine:

a. The need for inspection, the identification of inspection personnel and the documentation of inspection results.

b. That necessary inspection requirements, methods, and acceptance criteria have been identified.

Reinstate this commitment or justify not doing so.

Response:

This commitment is covered in FSAR Section 17.2.6.3 and 17.2.10.1.2.

260.57N

The response to question 421.37 indicates that FSAR Section 17.2.15.1 has been revised to require engineering evaluation of "use-as-is" and "repair" dispositions before the disposition is initiated. It appears that FSAR Amendment 42 deleted the underlined commitment. Reinstate this commitment or justify not doing so.

Response:

FSAR Section 17.2.15 requires "use-as-is" and "repair" dispositions be approved and justified in writing by Engineering. The last sentence requires the disposition to be reviewed by QA and approved by Plant Manager or Startup Manager as appropriate prior to implementation.

The words "prior to implementation" will be inserted after "approved and justified by Engineering" to clarify this commitment.

260.56N

The response to question 421.6 refers to FSAR Section 17.2.2.6 and its discussion of QA indoctrination sessions. FSAR Amendment 42 revised section 17.2.2.6 such that the QA indoctrination program is not discussed. Reinstate the prior commitments for QA indoctrination or justify not doing so.

Response:

The commitment was deleted; however, FSAR Section 17.2.2.6 will be revised to clarify that general indoctrination and training programs cover QA indoctrination.

under a quality assurance program to provide control of quality activities consistent with the scope of their assigned work. The quality assurance programs of such contractors or consultants shall be subject to review, evaluation, and acceptance by the QA Department prior to initiation of activities affected by the program.

17.2.2.9 System Turnover. Construction activities will be controlled by the STPEGS Quality Assurance Program Description. The Construction Manager has been assigned the responsibility for developing procedures for the control of system turnover. These procedures, the HL&P Startup Manual, and the Operations QA Plan shall control system release for test, phaseout of design and construction activities and turnover of plant systems for operations.

Q 260.1 50N

17.2.2.10 FSAR Changes. HL&P is committed to maintaining the FSAR as an effective and meaningful document to provide programmatic direction on STPEGS. Changes to the QA program, as described in the FSAR, ~~that decrease the level of commitment~~ will be processed in accordance with 10CFR50.54(a).

When changes are made to the organizational elements only in the FSAR, appropriate notification will be made to the NRC within 30 days of implementation.

17.2.2.11 Computer Code Programs. The development, control, and use of computer code programs which affect safety-related items will be conducted in accordance with the Operations QA Plan. Prior to use of a computer code program in a safety-related activity, the appropriateness of the program to the activity shall be verified. In additional, all such programs shall be appropriately certified for use. 4

17.2.3 Design Control

17.2.3.1 Design Control Measures. Procedures shall be established to control the preparation and review of design documents. These procedures shall ensure that design activities provide the correct translation of regulatory requirements and design bases into specifications, drawings, written procedures, instructions, and other design documents.

Design requirements and changes thereto shall be identified, documented, reviewed, and approved to assure incorporation of appropriate quality standards in design documents. Design requirements and quality standards shall be described to an appropriate level of detail in design criteria. Any exceptions to quality standards will be documented. Design criteria for modification to structures, systems, and components shall include the design bases described in the FSAR. Design criteria shall be reviewed by the QA Department for seismic and quality group classification, selection of quality standards, and deviations from quality standards for acceptability.

17.2.3.2 Application Review. A review for application suitability of materials, parts, equipment, and processes that are essential to the functions of safety-related structures, systems, and components is done as part of the design document preparation and review process. The procedures which govern the preparation and review of design documents require the use of valid industry standards and specifications in the application suitability review. Review of standard "off the shelf" commercial materials, parts, and equipment for suitability of application with safety-related structures, systems, and components will be conducted prior to selection.

Question 260.35N

The response to item 260.05 includes the statement that: "At this time, it is planned that the staff of the Plant QA Supervisor will perform the quality control inspections and NDE which are not subcontracted during the operations phase." It is the staff position that HL&P inform the staff of any changes to this plan. Provide such a commitment or justify not doing so.

Response

This responsibility is assigned to the QC Supervisor for the operations phase.

HL&P will inform the staff if any changes are made to this plan. See revised Section 17.2.2.11.

10

9
260.50N

1.

TABLE 3.12-1 (CONT'D)

REGULATORY GUIDE MATRIX

NO.	REGULATORY GUIDE TITLE	FSAR REFERENCE	REVISION STATUS	STATUS ON STP	
1.58	Qualification of Nuclear Power Plant Inspection, Examination, and Testing Personnel	14.2.4.4 14.2.2.8 17.2.2.1 17.2.10.6 17.2.11.3	Rev 0 (8/73) Rev 1 (9/80)	A See Note 59 ~~C See Note 32~~ A See Note 32	43 33 43
1.59	Design Basis Floods for Nuclear Power Plants	2.4.2.2 3.4 3.8.4.2.3	Rev 0 (7/73) Rev 2 (8/77)	A NA See Note 22	32
1.60	Design Response Spectra for Seismic Design of Nuclear Power Plants	3.7.1.1	Rev 1 (12/73)	C See Note 44	33
1.61	Damping Values for Seismic Design of Nuclear Power Plants	3.7.1.3 3.7.3.1.4 Table 3.7-1	Rev 0 (10/73)	A	32
1.62	Manual Initiation of Protective Actions	Table 7.1-1 7.2.1.1.3 7.3.1.2.2.7 8.3.1.2.4 8.3.2.2.7 Figure 7.1-1	Rev 0 (10/73)	A	36
1.63	Electric Penetration Assemblies in Containment Structures for Water-Cooled Nuclear Power Plants	3.11.2 7.1.2.8 Table 7.1-1 8.3.1.1.4.6 8.3.1.1.5 Figure 7.1-1	Rev 0 (10/73) Rev 1 (5/77) FC	A NA See Note 2	36
1.64	Quality Assurance Requirements for the design of Nuclear Power Plants	3.8.4.2.3 Figure 7.1-1	Rev 2 (6/76)	A	33
1.65	Materials and Inspections for Reactor Vessel Closure Studs	5.3.1.7	Rev 0 (10/73)	C See Note 50	33
1.66	Nondestructive Examination of Tubular Products	4.5.2.3 5.2.3.3.2 5.2.3.4.6 Table 5.2-6	Rev 0 (10/73)	C See Note 51	45
1.67	Installation of Overpressure Protection Systems	3.9.3.3 5.4.11.3 Table 7.1-1	Rev 0 (10/73)	A	23

Q 260.5/N

80 125. 05

TABLE 3.12-1 (Cont'd.)
REGULATORY GUIDE MATRIX
NOTES

31. Regulatory Guide 1.130 is not applicable to STP due to both the implementation date and the fact that Class 1 Plate-and-Shell Type Components Supports are not used. | 41

32. The QA program for operations will conform to the requirements of Regulatory Guide 1.58, Revision 1, ~~with the exception of regulatory position C.1.~~ Personnel who ~~(1)~~ approve prerequisite and preoperational test procedures ~~and~~ test results and (2) direct or supervise the conduct of individual prerequisite and preoperational tests will be qualified under the guidelines of ANSI N45.2.6-1978, rather than RG 1.8. | 43

Q260.51N

33. This Regulatory Guide has been withdrawn by the NRC. The regulatory position is now considered to be covered by one or more national standards. Withdrawal of this guide in no way laters any prior or existing licensing commitments based on its use.

34. This Regulatory Guide was withdrawn by the Commission on August 16, 1979 and replaced by NUREG-0554, "Single-Failure-Proof Cranes for Nuclear Power Plants." Withdrawal of this guide in no way alters any prior or existing licensing commitments based on its use.

35. Qualification of cement and lime for soil-cement erosion protection and lime treatment of soil in safety-related applications at the UHS is verified by in-process testing performed under the Constructor's QA-Program, in lieu of a vendor furnished program. | 23

36. Reference 6.2.5.2.4 specified Rev. 0 of RG 1.38 as it applies to the purchase of equipment during the construction phase; Rev. 2 of RG 1.38 applies to the operational phase. | 43

37. The STP Emergency Plan will follow the guidelines of NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plan and Preparedness in Support of Nuclear Power Plants".

38. The Operations QA Program for operations will conform to the requirements of Revision 3. | 27 Q260.06N

Q260.52N

39. The Operations QA Program for operations will conform to the requirements of Revision 1 of RG ~~1.39.~~ 1,144 | 43

40. HL&P is not committed to Regulatory Guide 1.108 for Surveillance Testing. | 36

41. HL&P does not plan to conduct in situ emergency sump recirculation testing (see Section 6.3.4.1 for details). The remainder of the preoperational testing program on the ECCS and its components will be conducted in accordance with Regulatory Guide 1.79. | 29

Question 260.36N

The response to item 260.07 refers to FSAR Section 17.2.2.6 which, in turn, refers to exceptions to Regulatory Guide 1.58, Revision 1, in FSAR Section 17.2.2.1. It is the staff position that the exception to Regulatory Guide 1.58, Revision 1 is unacceptable without justification. Supply such justification or delete the exception.

Response

Q260.5N

~~HL&P is currently reviewing RG 1.58, Revision 1. This question will be answered in a later amendment.~~

STP is ~~and~~ commited to RG 1.58 Revision 1, For operations.
See Table 3.12-1.

TABLE 3.2.A-1

BALANCE OF PLANT-QUALITY CLASSIFICATION OF STRUCTURES, SYSTEMS, AND COMPONENTS*

Structure, System or Component	Safety[1] Class	Standard or Code[2]	Seismic[3] Category	Quality[4] Assurance	Remarks
Reactor Coolant System					See P&IDs, Sec. 5.2
Piping, supports and valves	1, 2, NNS	III/1, III/2 ANSI B31.1	I, NA	B, NA	
Chemical and Volume Control System					See P&IDs, Sec. 9.3.4
Boric acid tanks	3	III/3	I	B	
Pulsation dampeners	2	III/2	I	B	
Piping, and valves and supports, etc.	2, 3, NNS	III/2, III/3 ANSI B31.1	I, NA	B, NA	See Note 8
Residual Heat Removal System					See P&IDs, Sec. 5.4
Piping, valves and supports, etc.	1, 2	III/1, III/2	I	B	
Spent Fuel Pool Cooling and Cleanup System				B	See P&IDs, Sec. 9.1.3
Piping, supports and valves in cooling loops	3	III/3	I	f	See Note 16
Piping, supports and valves in purification and in skimming loop	NNS	ANSI B31.1	NA	NA	
Reactor cavity filtration system (RCFS) pump	NNS	MS	NA	NA	
RCFS filters	NNS	MS	NA	NA	
RCFS strainers	NNS	MS	NA	NA	

*See notes at end of table for abbreviations

Q260 .53N (a,17)

33

TABLE 3.2.A-1

BALANCE OF PLANT-QUALITY CLASSIFICATION OF STRUCTURES, SYSTEMS, AND COMPONENTS

NOTES (Continued)

15. This equipment is not safety-related. The meteorological data collection programs which control these activities are within the scope of the STP operations phase QA program described in Section 17.2. | 42 Q260.4

16. The pertinant provisions of Appendix B apply per the response to Q260.53N. | Q260.53N

TABLE 3.2.A-1

BALANCE OF PLANT-QUALITY CLASSIFICATION OF STRUCTURES, SYSTEMS, AND COMPONENTS | 30

NOTES (Continued)

6. During and after a seismic event, the component and its supports are designed to retain structural integrity and prevent collapse and damage to safety-related equipment and structures. Operability need not be retained. | 2

7. This note has been deleted. | 33

8. Actual Q-valves, dampers, strainers and lines are identified on the system P&IDs, system isometric drawings, and/or piping class summary sheets and Instrument Index. | 45

9. Supports of components with a nuclear safety function are the same safety class as the components they support. | 33

10. Equipment is not safety-related but is required to function during and after a SSE or OBE, as applicable. See RG 1.12 for seismic instrumentation and RG 1.45 for RCPB instrumentation. | 30

11. Table indicates the required code and/or seismic category based on its safety-related importance as dictated by service and functional requirements and the consequences of failure. The actual equipment may be designed to code, quality assurance, and/or seismic guidelines which are higher than required. | 45

12. Depending on the qualification category of the equipment as defined in Appendix 7A of the FSAR and in RG 1.97 the following QA requirements apply: | 33

    - Category 1 equipment meets the QA requirements of 10CFR50, Appendix B.
    - Category 2 equipment meets a modified program similar to that program for fire protection and radioactive waste management equipment.
    - No special QA requirements are applicable for Category 3 equipment.

13. The actual code class break is extended to the first weld outside the isolation valve cubicle north wall for support and operability reasons.

14. The radiation monitoring system components are discussed in Sections 11.5 and 12.3, including both the safety-related Class 1E monitors and RG 1.97, Category 2, monitors. | 42 Q260.47

Q 260.53N (a.28)

Response 260.47N (Continued)

c. Modifications of site and roof drainage systems shall be evaluated and accomplished under the pertinent provisions of 10CFR50 Appendix B during the operations phase.

e.4 Per NUREG-0737, Item II.B.3, and RG 1.97, the Post-Accident Sampling System (PASS) is not classified as a safety-related system with the exception of those portions of the PASS that perform Containment isolation. The portions of the PASS that perform Containment isolation are classified as safety-related and are subject to the pertinent portions of 10CFR50 Appendix B during design and operation. The PASS is described in further detail in Section 9.3.2

e.5 The pressurizer power-operated relief valve ~~and the Safety Relief Valve~~ status indication is classified as Class 1E and thus is subject to the pertinent provisions of 10CFR50 Appendix B during the Operations phase. The pressurizer safety-relief valve status indication meets the qualification requirements of RG 1.97 (see Section 7.5.1 and Appendix 7B). Response Revised - See Question 260.53N

Ø 260.53N (e.5)

e.7 The auxiliary feedwater flow indication is classified as Class 1E and thus is subject to the pertinent provisions of 10CFR50 Appendix B during the Operations phase.

e.11 & 12 The proper reference for "Post-Accident Monitoring Instrumentation" is Table 3.2.A-1. The instrumentation for detection of inadequate core cooling is classified as Class 1E and thus is subject to the pertinent provisions of 10CFR50 Appendix B during the Operations phase. This instrumentation is further described in Appendix 7A, Item II.F.2.

e.15 Automatic trip of the reactor coolant pumps as described in NUREG-0737, Item II.K.3.5, is not required on STP (see Appendix 7A, Item II.K.3.5).

e.17 The reactor trip system is listed in Table 3.2.B-2.

e.20 In accordance with NUREG-0737, Supplement 1, the hardware and software of the emergency support facilities are not required to be safety-related or qualified and thus the pertinent provisions of 10CFR50 Appendix B do not apply during the Operations phase.

TABLE 3.2.B-2

EQUIPMENT CODE AND CLASSIFICATION LIST WESTINGHOUSE SUPPLIED NON-FLUID SYSTEM COMPONENTS

NOTES

1. 1, 2, 3, NNS = Safety classes defined in Section 3.2.B.2.

   NA = Not applicable

2. Portions of equipment containing component cooling water are SC 3, Code Class 3.

3. Meets "Quality Control System Requirements," Westinghouse QCS-1, which satisfies requirements of 10CFR50, Appendix B, Quality Assurance Criteria. The operations QA program as described in FSAR Chapter 17.2 is applicable Q260.54N

4. Meets "Quality Requirements for Manufacture of Nuclear Plant Equipment," Westinghouse QCS-2, which satisfies requirements of 10CFR50, Appendix B. The Operations QA Program as described in FSAR Chapter 17.2 is applicable Q260.54N

5. Access for inspection and test required by Westinghouse; however, no formal quality program approval required.

6. Meets the quality assurance program of one of the Westinghouse NES manufacturing divisions and is in accordance with 10CFR50, Appendix B. The operations QA Program as described in FSAR Chapter 17.2 is applicable Q260.54N

7. Safety classes for piping and valves are as defined by the P&IDs. Code classes are those required by the safety class. 30

8. Represents code class upgrading:

   8a. As permitted by paragraph NA-2134 of the ASME B&PV Code, Section III, this component is upgraded from the minimum required Code Class 2 to Code Class 1.

   8b. As permitted by paragraph NA-2134 of the ASME B&PV Code, Section III, this component is upgraded from the minimum required Code Class 3 to Code Class 2.

9. Parts are mechanically of safety class and must meet the structural integrity requirements of the specification and quality assurance requirements of 10CFR50, Appendix B.

10. Failure can cause no nuclear safety problem, although an economic loss may result.

11. This component is SC 3 under the definition 2.2.3(1), (3), or (4) of ANSI N18.2-1973 and qualifies for no special seismic design by meeting the four conditions listed in Section 3.2.B.1. Portions of systems in which this component is located that perform the same safety function likewise qualify for no special seismic design. 33

TABLE 3.2.B-2

EQUIPMENT CODE AND CLASSIFICATION LIST WESTINGHOUSE SUPPLIED NON-FLUID SYSTEM COMPONENTS

NOTES (Continued)

22. Equipment meets "Quality Control System Requirements" Westinghouse QCS-1; however, no quality assurance program is required. 30

23. Equipment meets "Quality Requirements for Manufacture of Nuclear Power Plant Equipment," Westinghouse QCS-2; however, no quality assurance program is required. The Operations QA Program as described in FSAR Chapter 17.2 is applicable. Q260.54N

24. Equipment meets QA program outlined in WCAP 7800. The Operations QA program as described in FSAR Chapter 17.2 is applicable. 33

25. Quality Assurance programs for safety class valves meet the requirements of 10CFR50, Appendix B as appropriate.

17.2.2.3 Development of the QA Program. The Operations QA Program shall be fully implemented 90 days prior to initial fuel loading. The QA Program shall be implemented throughout the operating life of the STPEGS.

Activities, prior to full QA Program implementation, shall be controlled by procedures developed and implemented prior to the performance of the activity. These procedures shall be reviewed, approved, and controlled in accordance with Sections 17.2.5 and 17.2.6.

17.2.2.4 QA Program Documents. The QA Program shall be implemented with plans, procedures, and instructions to ensure effective control of all quality activities. The relationship of various manuals is shown on Figure 17.2-3.

Figure 17.2-3 lists the typical procedures that will be developed to implement the QA Program. Provisions for procedure consolidation, separation, deletions, additions, or minor program changes do not permit including a complete listing of implementing procedures.

17.2.2.5 Policies and Goals. It is the policy of HL&P, acting as a licensee and Project Manager for the other owners of the South Texas Project Electric Generating Station (STPEGS), to assure that the design, procurement, construction, testing, and operation of the STPEGS are in conformance with specifications, procedures, codes, and NRC regulations. It is the responsibility of each organization supporting the STPEGS to ensure that the requirements stated in this quality assurance program are incorporated into procedures. Adherence to those procedures is mandatory for all HL&P organizations and for all contractors or vendors providing items or services covered by the QA program. 42

The Operations QA Plan identifies activities and establishes requirements for procedures which identify, initiate, and verify the resolution of safety-related 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 resolved at lower levels, the Manager, Quality Assurance, presents the problem to the HL&P Executive Vice President, Nuclear Group, for resolution.

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17.2.2.6 Personnel Indoctrination and Training. General indoctrination and training programs shall be provided for the general office and plant site personnel to assure that they are knowledgeable regarding quality ~~Programs~~ and requirements. The requirements for training HL&P personnel are described in FSAR Chapter 13.2. The training of plant operating personnel is the responsibility of the Nuclear Training Department. Records of training shall be maintained to demonstrate compliance with the qualification requirements. 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 specific activities described in Sections 17.2.9, 17.2.10, and 17.2.11 of this chapter.

Material nonconformance disposition categories are:

1. "Use-as-is";

2. "Reject";

3. "Rework" in accordance with documented procedures; and

4. "Repair" in accordance with documented procedures.

Procedures shall identify the individuals or groups responsible for providing the disposition of nonconformances. The "use-as-is" and "repair" disposition of nonconforming items shall be approved and justified in writing by Engineering. The disposition and recommended action are reviewed by Quality Assurance and approved by the Plant Manager prior to implementation.

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prior to implementation.

Repaired and reworked items shall be reinspected to inspection criteria at least as stringent as those applied to the original work. Reinspection results are documented on nonconformance reports, inspection reports, or other suitable type document by Quality Control personnel.

17.2.15.2 Supplier Control. Procedures shall provide for the control of further processing or delivery of nonconforming or defective items found at a supplier facility pending a decision on their disposition. When a contractor, supplier, or service organization identifies a nonconforming item and recommends a "use-as-is" or "repair" disposition, concurrence of the responsible HL&P Engineering group with the disposition is required. 42

17.2.15.3 Conditional Release. Nonconforming material, parts, and components may be installed after the effect of their installation has been evaluated and the installation approved by the Plant Manager and the Operations QA Manager. Nonconforming items which may not be installed are those which because of their makeup and intended use cannot be returned to their original state after being installed and those which if installed in and later removed from a system, structure, or component, would cause degradation. Except for proof testing, installed nonconforming items are not energized, used, or placed in service until the action required by the disposition has been completed and reinspected.

17.2.15.4 Trend Analysis. Deficiencies reported shall be analyzed by the QA Department for identification of unsatisfactory quality trends. The results of these analyses shall be reported to the affected organization and executive management. Significant adverse trends shall be handled in accordance with Section 17.2.16.

17.2.15.5 Reportable Conditions Significant conditions during plant operations involving a defect or noncompliance in a delivered component or service which could create a substantial safety hazard shall be reported to the Nuclear Regulatory Commission pursuant to the requirements of 10CFR21 during operation and 10CFR50.55(e) during the preoperational test phase.