Portland General Electric Company

Bart D. Withers Vice President

August 16, 1985

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Mr. D. F. Kirsch, Acting Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission, Region V
1450 Maria Lane, Suite 210
Walnut Creek CA 94596-5368

Dear Mr. Kirsch:

Quality Assurance Program for Trojan Operations

The following responses to your requests for additional information or clarifications of specific changes in Revision 10 to the Nuclear QA Program transmitted by your letter of July 3, 1985 are provided. Also included, as attachments to this letter, are marked-up pages of the Nuclear QA Program which will be formally submitted to you in November 1985 as a part of Revision 11.

Chapter 3.0 Design Control

NRC Comments

a. Section 3.2.3. Deletion of the Nuclear Safety and Regulation Department's review and concurrence with the Request for Design Change safety and environmental evaluation prior to review by the Plant Review Board is a reduction in the QA program commitments. Additional justification is requested for this deletion in order to evaluate the acceptability of this change.

b. Section 3.2.4. Revision 10 does not address the requirement for the appropriate engineering department's approval of Detailed Construction Packages. Please provide clarification for this omission or if this action is no longer a requirement, justification for the apparent reduction in QA program commitments.

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PGE Responses

a. The Nuclear Safety and Regulation Department (NSRD) will continue to review safety evaluations for RDCs. Revision 10 to the QA Program (Section 3.2.3) allows this review to be conducted after review by the Plant Review Board.

The reviews by NSRD are done as staff work for the Trojan Nuclear Operations Board (TNOB) in accordance with Technical Specification 6.5.2.7(a). This Technical Specification states that:

> "The TNOB shall review the safety evaluations for 1) changes to procedures, equipment, or systems, and 2) tests or experiments completed under the provision of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question."

This Technical Specification, which forms the basis for NSRD's/TNOB's review of RDCs, allows the review of safety evaluations to be performed after-the-fact, as reflected in Revision 10 to the QA Program. Since this is allowed by Technical Specifications and since NSRD will still continue to review the safety evaluations, this is not felt to be a reduction in QA Program commitments.

The QA Program was originally approved by NRC to allow for NSRD/TNOB review of RDCs as proposed in Revision 10. This was changed in 1980 to reflect that NSRD/TNOB review occurred prior to PRB review as an internal PGE policy. It has since been determined that a prior review on the critical path for RDCs is not productive, practical, or warranted, and therefore, the original review and approval process for safety evaluations has been restored.

b. The requirement for the appropriate engineering department's approval of Detailed Construction Packages (DCPs) was inadvertently omitted during typing of Revision 10 to the QA Program. Section 3.2.4 will be revised in Revision 11 (see Page 3-4 of our attachment) to more clearly delineate the approval authority for DCPs. Approval of DCPs by either the Manager, Nuclear Plant Engineering, or the Plant Engineering Supervisor, depending upon which organization prepared the DCP, has been a longstanding requirement.

Chapter 15.0 Nonconforming Materials, Parts of Components, and Corrective Action

NRC Comment

Section 15.1 (Purpose). This section fails to provide a statement concerning corrective action. A description of the Purpose as stated in Chapter 16.0 of Revision 9 is needed since Revision 10 is incorporating requirements for corrective action.

PGE Response

A statement concerning corrective action will be added to the Section 15.1 (Purpose) of Chapter 15.0 (see Page 15-1 of our attachment).

Chapter 16.0 Nonconforming Activities and Corrective Action

NRC Comment

Section 16.2.3 of Revision 9 required corrective actions associated with nonconforming activities to be submitted to the plant General Manager for approval. Revision 10 replaced "the plant General Manager" with "the responsible organization management". Since organizational structures have been subject to change there are no assurances that the proper level of management attention would be provided to resolve plant problems. It is required that you revise Revision 10 to specify the plant General Manager or provide justification for this apparent reduction in QA program commitments.

PGE Response

Section 16.2.2 will be revised in Revision 11 (see Page 16-3 of attachment) to more clearly indicate the approval authority for corrective actions for nonconforming activities. The NCAR form is now used by all Nuclear Division organizations. Corrective actions which require action by the Plant will be approved by the Plant General Manager or his designee. This approval process is also described in Section 1.2.2.1.4 of the QA Program under the responsibilities of the Plant General Manager and was not changed in Revision 10. Those corrective actions which require actions by offsite support organizations will be approved by the cognizant Manager.

Sincerely,

C P Lamdt for

Bart D. Withers
Vice President
Nuclear

Attachment

c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy

appropriate witness and inspection hold points, for the work to be accomplished.

11 Design verification is performed during final review of the DCP ~~and prior to the approval by the management of the preparing organization~~. Design verification is performed by individuals other than those who performed the original design. The individuals performing the verification do not have immediate supervisory responsibilities, or have specified the design approach, or have ruled out certain design considerations, or have established the design inputs. Cursory reviews do not satisfy the design verification requirements.

Design verification for design changes is accomplished by any one or more of the processes of design reviews, alternate calculations, or testing. Design reviews for quality-related items can be completed by the Nuclear Safety & Regulation Department as requested by Trojan Technical Services or Nuclear Plant Engineering.

10 Additionally, design reviews can be completed by Trojan Technical Services for Nuclear Plant Engineering prepared DCPs, by Nuclear Plant Engineering for Trojan Technical Services prepared DCPs, by either PGE engineering organization for consulting engineer prepared DCPs, or by individuals within the same group who are independent of the design originator. Reviews of the environmental impact analysis of RDCs and DCPs will be performed by the Environmental & Analytical Services Department as requested by Trojan Technical Services or Nuclear Plant Engineering.

11 # DCPs are approved by the Manager, Nuclear Plant Engineer or Plant Engineering Supervisor as assigned by the plant General Manager. All approved DCPs are reviewed by the Trojan Plant Engineering Supervisor or his PRB alternate, for the plant General Manager, prior to implementation. This final review assures that an approved RDC exists and that the DCP conforms to the approved preliminary design and safety evaluation. DCPs are then approved for implementation by the TPE Supervisor acting for the plant General Manager. Installation of the modification or design change is performed by Plant Maintenance, the Plant Modifications Department, or a contractor. Nuclear Plant Engineering conducts a post-installation review to verify conformances to the details of the DCP.

10| 15.0 NONCONFORMING MATERIAL, PARTS, OR COMPONENTS AND CORRECTIVE ACTION

15.1 PURPOSE

This chapter describes measures for documentation and control of nonconforming quality-related items to prevent their inadvertent use or installation in the Trojan Nuclear Plant. Ultimate disposition measures
11| ~~10|~~ and approval of corrective actions are described.

10| ## 15.2 NONCONFORMING MATERIAL CONTROL PROGRAM

15.2.1 General

Material, parts, and components that deviate from approved specifications, codes, drawings, or other applicable documents are considered as nonconforming.

A Nuclear Division Procedure (NDP) governs the identification, control, and disposition of nonconforming items identified during operation which are not reworked by the MR process, and serves as a basis for notification of responsible organizations.

A nonconforming item may be installed or remain in service provided that
10| the nonconforming condition is satisfactorily evaluated by responsible engineering supervision and the Shift Supervisor and is determined to have no adverse effect on the safe operation of the plant. Nonconforming items are not relied upon to fulfill their intended functions until the nonconformance is resolved.

When feasible, nonconforming items are clearly identified with Quality Control Hold Tags and segregated to indicate their unacceptable status until the nonconformance is properly dispositioned. To preclude operation with installed nonconforming items which could have an adverse effect on plant safety, those items are also tagged in accordance with
11| Section 14.2.2 of this QA Program by the plant operator under the

The Trojan QA staff or the NQAD evaluates the NCAR for validity and will forward valid NCARs to the responsible supervisor or manager for corrective action and a determination of the root cause of the nonconforming activity. NCARs determined to be invalid during the QA evaluation will be returned to the originator with an explanation regarding the determination.

The responsible supervisor or manager evaluates the nonconforming activity to determine if a significant condition adverse to quality exists or if it is potentially reportable. Nonconforming activities determined to be significant conditions adverse to quality require corrective actions to be taken to preclude repetition. For nonconforming activities that are significant conditions adverse to quality, a response is required in less than 30 days, otherwise, a response shall be due 30 calendar days from the date the NCAR is distributed.

10 The responsible supervisor or manager documents proposed corrective actions which include an identification of the root cause on the NCAR and submits them to the plant General Manager or his designee or offsite manager, as appropriate, ~~responsible organization management~~ 11 for approval. Following approval of the corrective action, the NCAR is transmitted to the appropriate QA organization for evaluation of the proposed corrective action to determine if the action is adequate to close the NCAR. (Unacceptable corrective action is documented and resubmitted to the responsible organization management for additional corrective action.) Inappropriate or incomplete corrective action may result in suspension of the associated operation or activity.

If corrective action cannot be completed as scheduled, the responsible supervisor or manager is required to provide the appropriate QA organization with a new completion date for corrective action.

The QA organizations verify implementation of the corrective action through reviews, audits, or surveillances.