

November 14, 1996

Mr. Lew W. Myers
Vice President - Nuclear
Centerior Service Company
P.O. Box 97, A200
Perry, OH 44081

Dear Mr. Myers:

Thank you for your 10 CFR 50.54(a) submittals dated July 23 (letter PY-CEI/NRR-2079L) and November 12, 1996, which proposed changes to your Quality Assurance Program description. The November 12 submittal provided additional information and modifications to the July 23 submittal. Your submittals proposed an organization change in which the primary responsibility for overseeing the quality assurance program would be transferred to the Manager, Quality Assurance Section (QAS). Our understanding is that qualification requirements described in these submittals supersede those described in your 10 CFR 50.54(a) submittals dated July 23 (letter PY-CEI/NRR-2078L) and August 8, 1996, which had been approved by the NRC on August 9, 1996. This understanding was discussed between Mr. Emley of your staff and Mr. Ronald A. Langstaff of the NRC on November 13, 1996. We have reviewed the changes associated with these submittals. Based on our review of your submittals, we conclude that this revision continues to meet the requirements of 10 CFR Part 50, Appendix B, and is acceptable.

We appreciate your timely submittal of information required by 10 CFR 50.54(a). If there are changes to quality assurance commitments existing in docketed correspondence outside of the Quality Assurance Program description, you are obligated to notify this office. Please contact Mr. Langstaff of my staff at (630) 829-9747 with any questions you may have regarding this matter.

Sincerely,

Original signed by Andrew Dunlop for

Wayne J. Kropp, Chief
Engineering Specialists 1

Docket No. 50-440

Enclosures: 1. CEI ltr PY-CEI/NRR-2079L fm
Shelton to NRC dtd 07/23/96
2. CEI ltr PY-CEI/NRR-2115L fm
Myers to NRC dtd 11/12/96

See Attached Distribution

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cc w/encls: J. P. Stetz, Senior Vice
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Services Department
J. D. Kloosterman, Manager,
Regulatory Affairs
W. R. Kanda, Director, Perry
Nuclear Assurance Department
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July 23, 1996
PY-CEI/NRR-2079L

United States Nuclear Regulatory Commission
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Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
10CFR50.54(a)(3) Organization Change for the Perry Nuclear Assurance
Department and the Perry Training Section

Gentlemen:

The Perry Nuclear Power Plant (PNPP) is planning an organization change involving nuclear training and quality assurance. The change is being pursued as part of PNPP's overall efforts to streamline the organization and realign groups to improve communications, work flow, and effectiveness.

Under the planned change, the Perry Training Section will be transferred from the Perry Nuclear Services Department to the Perry Nuclear Assurance Department (PNAD). In conjunction with PNAD accepting the training responsibilities, some Nuclear Quality Assurance Program responsibilities will be transferred from the Director, PNAD to the Manager, Quality Assurance Section (QAS). A listing of the transferred responsibilities is contained in Attachment 1. In conjunction with the increased Quality Assurance Program responsibilities, the Manager, QAS will have the authority to directly access the Vice-President, Nuclear - Perry for quality issues.

The Director, PNAD will retain the responsibilities involved with the administration and management of the Quality Assurance, Quality Control, Independent Safety Engineering Group (ISEG), Perry Training, and Quality Services sections. This responsibility alignment will enable PNAD management to have the organizational freedom, independence, and sufficient authority to fulfill the Nuclear Quality Assurance Program responsibilities and, at the same time, accept the nuclear training functions.

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Operating Companies
Cleveland Electric Illuminating
Toledo Edison

PY-CEI/NRR-2079L

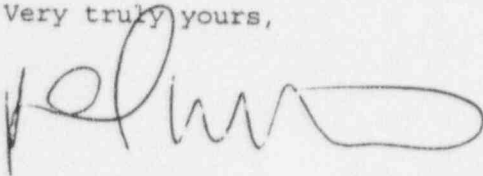
July 23, 1996

Page 2 of 2

Review of this change is being requested pursuant to the provisions of 10CFR50.54(a)(3), as it is considered to reduce the commitments in the Quality Assurance Program description previously accepted by the NRC. The change reduces the current commitment for the Director, PNAD to have no other duties or responsibilities unrelated to Quality Assurance, Quality Control, ISEG, and Quality Services. Effects of the commitment reduction are minimal because successful performance and management of quality assurance functions will not be impaired. The details and bases for the change are contained in Attachments 2 and 3.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs at (216) 280-5833.

Very truly yours,

A handwritten signature in dark ink, appearing to be 'JFP', with a long horizontal flourish extending to the right.

JFP:JEE:sc

Attachments

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager

TRANSFER OF RESPONSIBILITIES AND DUTIES
FROM THE DIRECTOR, PERRY NUCLEAR ASSURANCE DEPARTMENT
TO THE MANAGER, QUALITY ASSURANCE SECTION

DIR = Director, Perry Nuclear Assurance Department (PNAD)

MGR = Manager, Quality Assurance Section (QAS)

CURRENT	PROPOSED	USAR REF.	RESPONSIBILITY
DIR	MGR	17.2.1.3.2.2	<p>Direct access to management levels to address quality issues.</p> <p>Even though the Manager, QAS reports to the Director, PNAD, he will have direct access to the Vice President, Nuclear - Perry for issues involving quality assurance. This will ensure sufficient organizational freedom to ensure conformance to the Quality Assurance Program.</p>
DIR	MGR	17.2.1.3.2.2	<p>Overall responsibility for verifying effective implementation of the Quality Assurance Program.</p> <p>The Director, PNAD will retain overall responsibility for the Quality Assurance Program since this includes the duties of the the Quality Control Section. The Manager, QAS will assume responsibility for program implementation and effectiveness to avert any potential conflict of interest.</p>
DIR	MGR	17.2.1.3.2.2	<p>Has no other duties unrelated to QA.</p> <p>The Director, PNAD will be assuming more responsibilities unrelated to quality assurance (i.e. the Perry Training Program). Therefore, the Manager, QAS is being designated as the individual that will be able to give full attention to quality assurance matters.</p>
DIR	MGR	17.2.1.3.2.2	<p>Provide for a system of planned and periodic internal audits to assure the implementation of QA policies, procedures and instructions addressed in the Operational QA Program.</p> <p>The Manager, QAS will be responsible for the internal audit program so that he can fulfill his responsibility for verification of Quality Assurance Program implementation.</p>

DIR	MGR	17.2.1.3.2.2	<p>Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention, immediately, any significant quality-related problem or deficiency.</p> <p>This responsibility will be assumed by the Manager, QAS so that quality issues may be presented to upper management if needed.</p>
DIR	MGR	17.2.1.3.2.2	<p>Periodically evaluate and report on the status and adequacy of the Quality Assurance Program to appropriate management.</p> <p>This responsibility is being transferred as part of the Manager, QAS responsibility for verification of effective implementation of the Quality Assurance Program.</p>
DIR	MGR	17.2.1.3.2.2	<p>Initiating stop work, or control further processing, delivery, or installation of nonconforming material or activity as described in applicable quality assurance procedures and instructions and in the applicable plant procedures and instructions.</p> <p>The Manager, QAS will assume this responsibility as the quality assurance individual who has sufficient organizational freedom to verify effective implementation of the Quality Assurance Program.</p>
DIR	MGR	17.2.1.3.2.2	<p>Qualification requirements for the Manager QAS at the time...</p> <p>These qualification requirements, which were previously prescribed for the Director, PNAD are to be applied to the Manager, QAS since he is the individual responsible for ensuring effective implementation of the Quality Assurance Program.</p>
DIR	MGR	17.2.1.3.2.2.1	<p>Overall responsibility for verifying the effective implementation of the Quality Assurance Program.</p> <p>The Manager, QAS will assume overall responsibility for verification of quality activities.</p>

DIR	MGR	17.2.2.3.2	<p>As the official given direct responsibility for verifying...</p> <p>The Manager, QAS will assume responsibility for evaluating the adequacy and effectiveness of the Quality Assurance Program. This includes assuring that appropriate corrective action is taken in a timely manner.</p>
DIR	MGR	17.2.6.3	<p>Responsible for evaluation of the project document control effectiveness through audit and other QA techniques.</p> <p>The Manager, QAS will be responsible for verifying implementation of document control measures as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.</p>
DIR	MGR	17.2.7.3	<p>Responsible for assuring through audit, inspection, source surveillance, and program evaluation techniques, that the control of purchased equipment, material and services is established, approved, implemented, and effective.</p> <p>The Manager, QAS will be responsible for verifying implementation of controls for purchased items and services as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.</p>
DIR	MGR	17.2.10.3	<p>Verify through audit or other quality assurance management techniques, that inspection programs are effectively implemented.</p> <p>The Manager, QAS will be responsible for verifying implementation of inspection programs as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.</p>
DIR	MGR	17.2.11.3	<p>Verify the implementation of test control requirements through audits.</p>

The Manager, QAS will be responsible for verifying implementation of test control measures as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.

DIR MGR 17.2.13.3

Verify the implementation of handling, storage and shipping requirements.

The Manager, QAS will be responsible for verifying implementation of handling, storage and shipping requirements as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.

DIR MGR 17.2.14.3

Through audits and the review of plant administrative control procedures shall verify the adequate establishment of programs for inspection, test and operating status both at the plant and in the facilities of vendors and contractors as appropriate.

The Manager, QAS will be responsible for verifying implementation of inspection, test and operating status programs as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.

DIR MGR 17.2.15.3

Verify the adequate implementation of nonconformance control both at the plant and in the facilities of vendors and contractors.

The Manager, QAS will be responsible for verifying implementation of nonconformance control measures as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.

DIR MGR 17.2.16.3

Resolving corrective action impasses with corporate management and delegating stop work authority to PNAD personnel and agents.

The Manager, QAS will be responsible ensuring corrective action is taken and for stopping work, when appropriate, as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.

DIR MGR 17.2.17.3

Performing planned and periodic audits to verify adequacy and implementation of QA record requirements by both internal organizations and external suppliers.

The Manager, QAS will be responsible for verifying implementation of record control measures as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.

DIR MGR 17.2.18.3

Providing a system of planned and periodic audits of organizations performing safety-related activities...

The quality assurance audit program will become the responsibility of the Manager, QAS as part of his overall responsibility for verifying effective implementation of the Quality Assurance Program.

Summary of the Proposed Change

The Perry Training Section will be transferred from the Perry Nuclear Services Department to the Perry Nuclear Assurance Department (PNAD). The transfer of training functions to PNAD represents a reduction in Quality Assurance Program commitment because the assignment conflicts with the commitment for the Director, PNAD to have no other duties or responsibilities unrelated to Quality Assurance, Quality Control, Independent Safety Engineering Group (ISEG), and Quality Services. Addition of the training responsibilities could dilute the ability of the Director, PNAD to give adequate attention to Quality Assurance, Quality Control, ISEG, and Quality Service matters as intended by USAR 17.2.1.3.2.2. Therefore, in order for PNAD to accept the training responsibilities, the change will transfer some of the Nuclear Quality Assurance Program responsibilities from the Director, PNAD to the Manager, Quality Assurance Section (QAS).

Details of the Proposed Change

Numerous text changes to the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR) Chapter 13.1, "Organizational Structure of Applicant" and Chapter 17.2, "Quality Assurance During the Operations Phase" are being made to incorporate the transfer of training to PNAD and modification of Director, PNAD responsibilities.

The changes can be summarized as follows:

1. The Perry Training Section (PTS) will be transferred from the Perry Nuclear Services Department to the Perry Nuclear Assurance Department. The Manager, PTS will report to the Director, PNAD.
2. Responsibilities of the Director, PNAD have been categorized into either line-management, or Quality Assurance Program and assessment activities. The Director, PNAD retains management responsibilities for managing the Quality Assurance, Quality Control, ISEG, Perry Training, and Quality Services sections. The Quality Assurance Program and assessment responsibilities will be assigned to the Manager, Quality Assurance Section.
3. The Manager, QAS is assigned overall responsibility for verifying the effective implementation of the PNPP Nuclear Quality Assurance Program. Specific responsibilities include:
 - review of the Quality Assurance Program to ensure it meets standards, regulatory commitments, and the Quality Assurance Program description,
 - stop work authority,
 - review and approval of procurement documents,
 - supplier evaluation and control,
 - assuring proper control of purchased material, equipment, and services,

- conducting planned, periodic internal audits and surveillances to assure proper implementation of the Quality Assurance Program,
 - regularly reporting to the Vice President, Nuclear - Perry the status of quality activities,
 - periodic evaluation and reporting on the status and adequacy of the Quality Assurance Program,
 - resolving corrective action impasses with plant management, and
 - verifying that controls/programs for inspection, records, nonconformances, test control, document control, inspection, test and operating status, and handling, storage, and shipping are effectively implemented
4. The Manager, QAS will maintain a line reporting relationship to the Director, PNAD. For quality and assessment issues, the Manager, QAS will have direct access to the Vice President, Nuclear - Perry.

Specific details of the changes are shown on the marked-up USAR pages provided in Attachment 3. Note, several of the marked-up pages have other USAR changes posted against them which are not relevant to this proposed change. For ease of understanding, the marked-up pages provided will only reflect this proposed change.

Basis for the Proposed Change

Under the proposed organization and responsibility changes, the PNPP Nuclear Quality Assurance Program will continue to implement the quality assurance functions described in 10CFR50 Appendix B Criteria 1, "Organization". These functions include:

- a. Assuring that an appropriate Quality Assurance Program is established and effectively executed, and
- b. Verifying, such as by checking and auditing, that activities affecting the safety-related functions have been correctly performed.

The Manager, Quality Assurance Section will assume the authority and responsibility for these quality assurance functions. To effectively implement these functions, the Manager, QAS will be given, through the Nuclear Quality Assurance Program Policy, the required authority and organizational freedom. The Manager, QAS will have sufficient independence from cost and schedule to execute the quality assurance functions involving safety considerations. The Manager, QAS will be free from non-QA related duties. The Manager, QAS will administratively report to the Director, PNAD while having direct access to corporate management up to and including the President, Chairman and Chief Executive Officer for quality matters if needed.

A listing of current and proposed quality assurance responsibility assignments is provided in Attachment 1 for easy comparison.

The Director, PNAD will retain the responsibilities involved with leading and managing the Quality Assurance, Quality Control, ISEG, Perry Training, and Quality Services sections. This responsibility alignment will enable PNAD management to provide full attention to QA and ISEG matters and have the organizational freedom, independence, and sufficient authority to fulfill the nuclear quality assurance program responsibilities and at the same time accept the nuclear training functions.

13.1.2.2.3 Perry Nuclear Services Department

Director, Perry Nuclear Services Department

The Director, Perry Nuclear Services Department (PNSD) has overall responsibility for the strategic and outage planning, centralized scheduling, developing and maintaining the overall Perry budget. Additionally, this director has the overall responsibility for material services, ~~and training.~~

This director is also responsible for compliance with the plant operating license, regulations, and the Operational Quality Assurance Program. The Director, PNSD reports to the Vice President, Nuclear - Perry.

Move to 17.2.1.3.2.2.5
(page 17.2-14)

Manager, Perry Training Section ←

The Manager, Perry Training Section is responsible for developing a Perry Training Program based on the input and direction of the Perry departments. This manager is also responsible for overall maintenance and operation of the control room simulator, selecting and certifying instructors, scheduling training activities and maintaining documentation of training completed. The Manager, Perry Training Section reports to the Director, ~~PNSD~~ ← PNAD.

Manager, Work Management Section

The Manager, Work Management Section is responsible for directing the scheduling for maintenance and testing performed during power operations, planning the maintenance, repairs, overhauls, testing, and modifications of mechanical and electrical equipment during operations and forced outages. In addition, this manager is responsible for developing schedules which integrate the design engineering of projects with the planned installation schedules. The Manager, Work Management Section reports to the Director, PNSD.

Manager, Materials Management Section

The Manager, Materials Management Section is responsible for planning for material requirements; maintaining and monitoring inventory levels; coordinating the procurement, receipt and issuance of materials; and coordinating storage to meet maintenance requirements. The Manager, Materials Management Section, reports to the Director PNSD.

13.1.2.2.4 Perry Nuclear Assurance Department (PNAD)

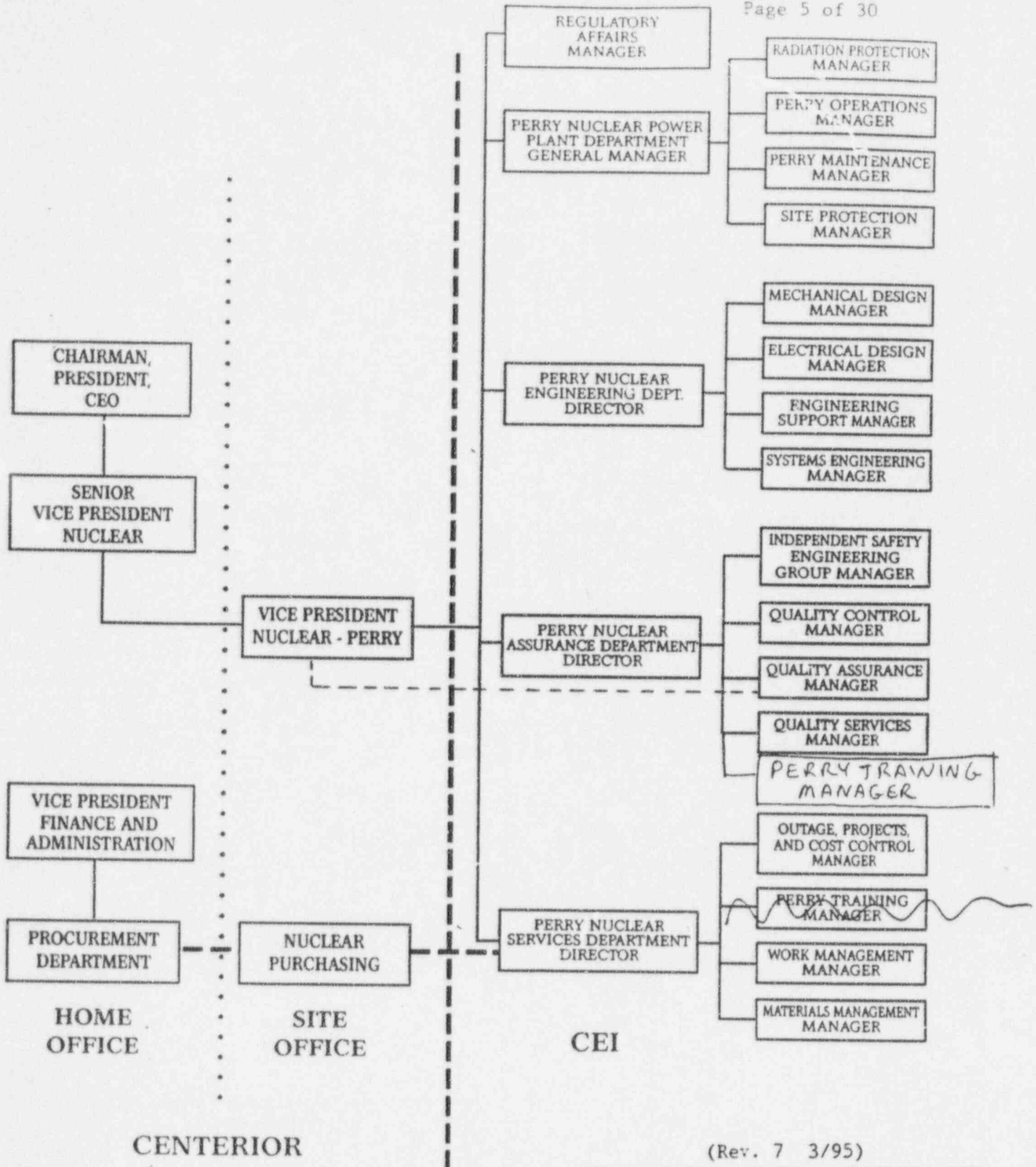
DELETE The Perry Nuclear Assurance Department has the functional authority, independence, and responsibility to verify the effective implementation of the administrative controls and the Quality Assurance Program during the Operational Phase of Perry. The Director, PNAD reports directly to the Vice President, Nuclear - Perry. This reporting relationship has been established to provide PNAD with sufficient independence from the influence of cost and schedule to be able to effectively assure conformance to Operational Quality Assurance Program requirements. The Director, PNAD, has the overall authority and responsibility for the Quality Assurance Program for Perry. The Director, PNAD also has the overall responsibility for providing general and procedural administrative services, document control, and records management.

Refer to Section 17.2.1.3.2.2 for additional information regarding the Perry Nuclear Assurance Department.


TABLE 13.1-1

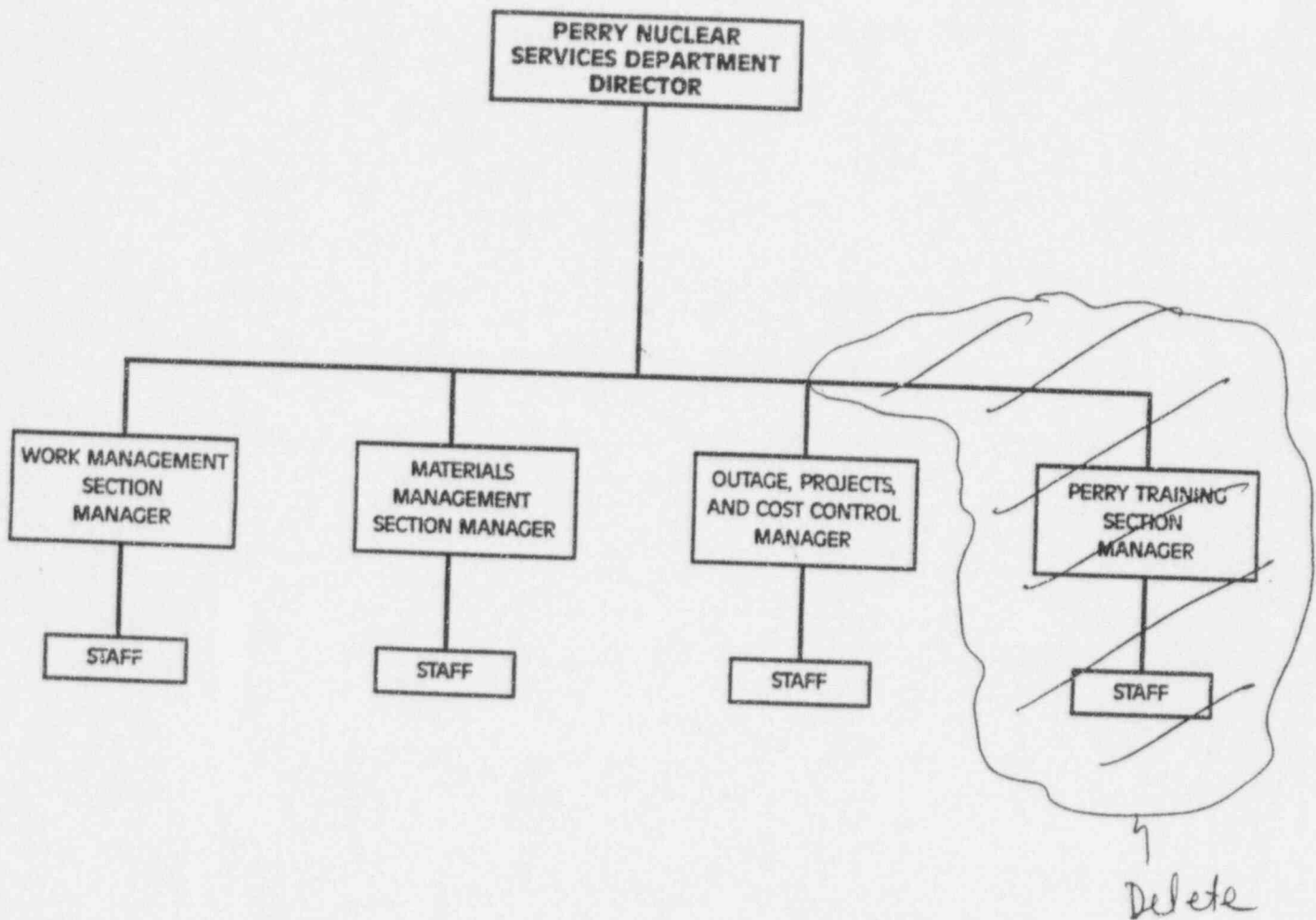
PERRY STAFF TITLES AND ANSI N18.1-1971 EQUIVALENT

<u>Perry Position or Title</u>	<u>ANSI N18.1-1971 Equivalent</u>
General Manager, Perry Nuclear Power Plant Department	*Plant Manager
Director, Perry Nuclear Assurance Department	Technical Manager
Director, Perry Nuclear Services Dept.	Technical Manager
Director, Perry Nuclear Engineering Dept.	*Engineer In Charge *Technical Manager
Manager, Perry Operations Section	*Operations Manager
Supervisor, Radwaste Unit	*Supervisor not requiring NRC License
Superintendent, Plant Operations	Operations Manager
Shift Supervisors	*Supervisors requiring NRC License
Unit Supervisors	*Supervisors requiring NRC License
Supervising Operators	*Operators
Manager, Perry Maintenance Section	*Maintenance Manager
Lead Supervisor, Maintenance Unit	*Supervisor not requiring NRC License
Supervisors, Maintenance	Supervisors not requiring NRC License
Manager, Materials Management Section	Maintenance Manager
Lead Instrumentation and Control Engineer	Instrumentation and Control *Professional-Technical
Lead Instrumentation and Control Supervisor	*Supervisor not requiring NRC License



(Rev. 7 3/95)

	PERRY NUCLEAR POWER PLANT THE CLEVELAND ELECTRIC ILLUMINATING COMPANY
	Perry Power Plant Operating Organization Figure 13.1-2



(Rev. 7 3/95)



PERRY NUCLEAR POWER PLANT
THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY

Perry Nuclear Services
Department Organization

Figure 13.1-5

Responsibility for review and coordination of their activities rests with the Director, PNED. The Director, PNED, is the Chairman of the Plant Operations Review Committee.

The Perry Nuclear Services Department consists of ^{three} ~~four~~ sections: Work Management, Outage, Projects, and Cost Control, Materials Management ^{and} ~~and Perry Training~~ Sections. The responsibilities of each element are discussed in Section 13.1.2.2.3.

The Perry Nuclear Assurance Department consists of ^{five} ~~four~~ sections: Quality Assurance, Quality Control, Quality Services, ~~and~~ Independent Safety Engineering Group Sections. The responsibilities of the department and each section are discussed in Sections 17.2.1.3.2.2, 17.2.1.3.2.2.1, 17.2.1.3.2.2.2, 17.2.1.3.2.2.3, ^{and} 17.2.1.3.2.2.4 ^{and} 17.2.1.3.2.2.5.

^{and} Perry Training

Additionally, the Manager, Quality Assurance Section (QAS), has direct access to the Vice President, Nuclear - Perry for quality issues.

17.2.1.3.2.2 Perry Nuclear Assurance Department (PNAD)

The Perry Nuclear Assurance Department has the functional authority, independence, and responsibility to verify the effective implementation of the administrative controls and the Quality Assurance Program during the Operational Phase of the Perry. Designated PNAD individuals routinely attend plant work schedule and status meetings in order to identify those plant activities which are safety-related and require QA coverage so that appropriate QA controls may be applied. Figure 17.2-2 shows the organizational structure of PNAD. The Director, PNAD reports directly to the Vice President, Nuclear - Perry. This reporting relationship has been established to provide PNAD with sufficient independence from the influence of cost and

The Manager, QAS,

schedule to be able to effectively assure conformance to Operational Quality Assurance Program requirements. The Director, PNAD, has the overall authority and responsibility for the Quality Assurance Program for Perry. The Manager, QAS, has overall responsibility for verifying the effective implementation of the Quality Assurance Program.

Manager, QAS, The Director, PNAD, has no other duties or responsibilities unrelated to

QA and ISEG, except for those non-quality assurance related functions of

Manager, QAS, the Manager, Quality Services Section. Therefore, the Director, PNAD

will be able to give adequate attention to QA and ISEG matters. The

Director, PNAD has direct access to management levels which will assure

the authority, and has a staff of sufficient size which will assure the ability:

The Director, PNAD,

- a. To evaluate the manner in which all activities, both onsite and offsite are conducted, with respect to quality, by means of check, review, audit, surveillance, and inspection.
- b. To perform evaluations on a planned and periodic basis to verify that the Quality Assurance Program is being effectively implemented.
- c. To identify quality problems, to initiate, recommend or provide solutions through designated channels and to verify implementation of resolutions.
- d. To initiate stop work action or control further processing, delivery, or installation of nonconforming material or activity as described in the applicable quality assurance procedures and instructions and in the applicable plant procedures and instructions.

The specific responsibilities of the Director, PNAD, include the following:

- a. Prepare, review and approve procedures and changes thereto, required to implement the requirements of this QA Program.

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FOR INFORMATION.

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NO CHANGES ON THIS PAGE

- b. Provide for the review and approval of the QA program of contractors providing services, and of vendors supplying materials, parts or components covered by the scope of this document.
- c. Provide for review and approval of procedures prepared by other organizations when these procedures control or exercise an effect upon an activity that falls within the scope of this document.
- d. Provide direction and supervision of the PNAD organization.
- e. Maintain a working interface and communication with the NRC, other organizations, consultants, contractors, vendors, and others as required to effectively execute the policies presented in this description of the QA Program.
- f. Provide for a system of planned and periodic audit and inspection of organizations, contractors and vendors performing activities that fall within the scope of this document.

~~g. Provide for a system of planned and periodic internal audit to assure the implementation of QA policies, procedures and instructions by organizations addressed in the Operational QA Program.~~

- g. Establish and assure the continuous implementation of an indoctrination and training program for PNAD QA/QC personnel and assure that a quality assurance indoctrination is provided to appropriate personnel outside the QA organization.

~~i. Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention immediately, any significant quality-related problem or deficiency.~~

- h. ~~d.~~ Provide for QA review and concurrence of safety-related plant modification and maintenance work authorizations. This includes the review of associated design documents to ensure proper review and approval, and inclusion of necessary quality assurance requirements.
- i. ~~d.~~ Provide for QA review and approval of procurement documents generated for the acquisition of materials and services that fall within the scope of this document.
- j. ~~d.~~ Provide for and maintain Quality Assurance records generated by PNAD until such time as they are turned over for permanent storage.

~~m. Periodically evaluate and report on the status and adequacy of the Quality Assurance Program to appropriate management.~~

- k. ~~d.~~ Perform receiving inspection activities at the plant site.
- l. ~~d.~~ Provide for adequate levels of inspection and surveillance of plant activities.
- m. ~~d.~~ Provide the resources necessary to ensure that the Independent Safety Engineering Group can perform the activities described in Appendix 1A, Item I.B.1.2 and Section 13.4.3.

- n. ~~d.~~ Provide general and procedural administrative services, document control, and records management.

o. Develop a Perry Training Program based on input and direction of the Perry departments.

→ Qualification requirements for the ~~Director, PNAD, at the time are:~~

Manager, QAS,

- a. Management experience through progressive assignment of increasing responsibility.
- b. Formal degree in a science or engineering discipline or professional registration or equivalent experience.

INSERT A

The specific responsibilities of the Manager, QAS, include the following:

- a. Provide for a system of planned and periodic internal audits to assure the implementation of QA policies, procedures and instructions by organizations addressed in the Operational QA Program.
- b. Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention immediately, any significant quality-related problem or deficiency.
- e. Periodically evaluate and report on the status and adequacy of the Quality Assurance Program to appropriate management.
- d. Initiating stop work, or control further processing, delivery, or installation of nonconforming material or activity as described in the applicable quality assurance procedures and instructions and in the applicable plant procedures and instructions.

plant experience in the overall implementation of the Quality Assurance Program. A minimum of 1 year of this 6 years experience shall be related technical or academic training. A maximum of 4 years experience may be fulfilled by related technical or academic training.

- d. Training in QA policies, standards, regulations, and practices.

The Director, PNAD, is assisted in carrying out his responsibilities by a staff organized into sections to provide adequate coverage of procurement, manufacturing, inservice inspection, refueling, maintenance, repair, modification, and operation of Perry (Figure 17.2-2). The staff includes required expertise to perform audit, quality engineering, surveillance, and inspection functions. In addition, quality assurance agents may be engaged to augment the PNAD staff. PNAD shall maintain direct control over any quality assurance agent.

17.2.1.3.2.2.1 Manager, Quality Assurance Section

The Manager, Quality Assurance Section, is responsible for implementing a system of planned periodic internal audits and surveillances. Section activities include input to and review of procedures and corrective action programs; reviewing changes to the Operations QA Plan; surveillance of plant operations; and providing administrative support for PNAD.

17.2.1.3.2.2.2 Manager, Quality Control Section.

The Manager, Quality Control Section, is responsible for review and approval of procurement documents; maintains a program for approval, audit and surveillance of suppliers; and

{ has overall responsibility for verifying the effective implementation of the Quality Assurance Program. He

performs receipt inspection for items and services within the scope of this document. The Manager, Quality Control Section is also responsible for coordinating site quality functions associated with construction, reviewing work orders, non-destructive examination (NDE) support, inspecting maintenance or modification activities for Perry, reviewing work procedures and completed documentation and providing PNAD coordination and support for outages during operations.

17.2.1.3.2.2.3 Manager, Independent Safety Engineering Group

The Manager, Independent Safety Engineering Group (ISEG) is responsible for performing the activities contained in the ISEG Charter as described in Appendix 1A Item I.B.1.2 and Sections 13.4.3. This Manager ensures that the ISEG examines plant operating characteristics, NRC issuance, industry information and other sources of design and operating experience that may indicate ways of improving plant safety. The ISEG performs periodic, independent reviews of plant activities and aids in establishing programmatic requirements. Members of the ISEG report to the Manager, ISEG, who reports to the Director, PNAD.

17.2.1.3.2.2.4 Manager, Quality Services Section

The Manager, Quality Services Section is responsible for implementing the Perry procedure/instruction program, performing document and drawing control activities, providing permanent storage for and retrieval of construction and operations records, and for furnishing administrative services in support of plant activities. The Manager, Quality Services Section reports to the Director, PNAD.

17.2.1.3.2.2.5 Manager, Perry Training Section

=> Text from p. 13.1-18a

Any corrective action which may be deemed necessary, as a result of these yearly assessments, shall be formally identified and tracked to resolution.

17.2.2.3.2 *Manager, Quality Assurance Section (QAS)*
~~Director, Perry Nuclear Assurance Department (PNAD)~~ *e*

Manager, QAS,
The ~~Director, PNAD~~, as the official given direct responsibility for verifying the effective implementation of the Perry Operational QA Program, shall establish and implement a formally documented and procedurally controlled program to evaluate and report to the Vice President, Nuclear - Perry on the adequacy and continued effectiveness of the overall Perry OQA Program. Reports of audits performed by PNAD or their agents, and quality trend analysis will provide the basis for this evaluation. Corrective action shall be implemented by responsible management, as deemed appropriate, when analysis reveals adverse quality trends. These actions may involve specific actions to provide compliance with the QA Program, and may include follow-up audits or revision to the OQA Program. Implementation and close-out of corrective actions shall be monitored by the ~~Director, PNAD~~, to assure timely correction and compliance. *Manager, QAS,*

17.2.2.3.3 Director/General Manager of Each Organization

The Director/General Manager of each organization is responsible for implementing training and indoctrination programs for their respective organizations which meet the requirements in Section 17.2.2.2., Item g.

17.2.2.4 Delegated Authorities

Quality assurance programs and implementing procedures for suppliers or contractors providing materials and services for Perry which are covered under the scope of this QA Program shall be subject to review and acceptance by PNAD prior to the commencement of any activity covered under the scope of this QA Program. Procurement documents shall

17.2.6.3 Responsibilities and Authorities

17.2.6.3.1 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for controlling documents affecting the quality of safety-related structures, systems and components at the plant in accordance with administrative procedures which conform to the requirements of this section. This responsibility includes the control and distribution of procedures and instructions at Perry.

The Director, PNAD, is also responsible for assuring the review and approval of project documents defining the document control measures.

~~In addition, the Director, PNAD,~~ is responsible for evaluation of the project document control effectiveness through audit and other QA techniques.

17.2.6.3.2 Manager, Quality Assurance Section
The Manager, QAS,

17.2.7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

17.2.7.1 Policy

The procurement control of material, equipment and services during the operations phase shall be performed in accordance with written policies and procedures. Quality Assurance measures shall apply to the procurement of services and materials including spare parts, replacement

Commercial grade items shall be subject to receipt inspection as delineated in 17.2.7.2.1.(d) to provide the necessary assurance that an acceptable item has been furnished. Special quality verification requirements shall be considered when specific quality assurance controls appropriate for nuclear applications cannot be imposed in a practicable manner.

17.2.7.3 Responsibilities and Authorities

17.2.7.3.1 Department General Managers and Directors

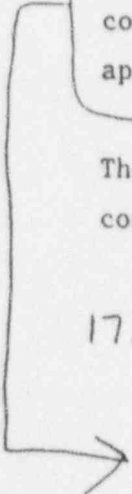
Each department general manager or director is responsible for the establishment of procedures to ensure the control of purchased equipment, material and services and for the development and administration of the special service agreements with their agents and consultants.

17.2.7.3.2 Director, Perry Nuclear Assurance Department

Manager, QAS,
The ~~Director, PNAD~~ is responsible for assuring through audit, inspection, source surveillance, and program evaluation techniques, that control of purchased equipment, material and services is established, approved, implemented, and effective.

The Director, PNAD, reviews and approves Perry procedures for the control of purchased equipment, material and services.

17.2.7.3.3 Manager, Quality Assurance Section



17.2.10.3 Responsibilities and Authorities

17.2.10.3.1 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for the establishment of inspection plans, procedures, instructions, and checklists. and assuring through audit or other quality assurance management techniques, that inspection programs are effectively implemented. The inspection efforts at the plant shall include the performance of receipt inspection on material, parts and components received at the site.

The Director, PNAD, is responsible for reviewing maintenance and modification procedures and/or safety-related work requests to determine the necessary inspection requirements, establish inspection hold or witness points, designate inspection personnel and to develop inspection instructions and/or checklists and methods of documenting inspection results.

← { 17.2.10.3.2 Manager, Quality Assurance
The Manager, QAS, shall verify Section

17.2.11 TEST CONTROL

17.2.11.1 Policy

The basic requirements for all organizations performing tests on safety-related structures, systems and components during startup and throughout all phases of operation shall be defined. The test program shall be identified, documented and accomplished in accordance with procedures that are written, approved and controlled. The preoperational testing (performed in accordance with Section 17.1) and startup testing (performed in accordance with Section 17.2) controls are described in Chapter 14. Tests performed after modification, repair or replacement shall be in accordance with the original design and testing requirements or properly approved acceptable alternatives. The extent of testing shall be based on the complexity of the modification,

- h. Mandatory hold or witness points for inspection by PNAD, the Authorized Nuclear Inspector and/or other designated personnel.
- i. Provisions for control of jumpers, lifted leads and jurisdictional or safety tags.
- j. Provisions for returning a system to normal configuration upon completion of the test.

Test results shall be documented, evaluated and their acceptability determined by a responsible individual or group.

17.2.11.3 Responsibilities and Authorities

17.2.11.3.1 General Manager, PNPPD, and Director, PNED

The General Manager, PNPPD, and Director, PNED, are responsible for conducting test and test control activities at the plant in accordance with approved written procedures which conform to the requirements of this section. The general manager assumes responsibility for test control of each system when that system is accepted from NTS as ready for fuel loading and startup. Startup testing shall be reviewed by the PORC and, if acceptable, a recommendation for approval shall be made to the General Manager, PNPPD, and Director, PNED.

17.2.11.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for reviewing and approving test control procedures and reviewing instructions for testing activities to be conducted at the plant. He shall further verify the implementation of test control requirements through the conduct of inspections and audits.

17.2.11.3.3 Manager, Quality Assurance Section
The Manager, QAS,

17.2.13.3.2 Director, Ferry Nuclear Assurance Department

The Director, PNAD, is responsible for receipt inspection verification of special handling and packaging maintenance during shipment, and conducting inspections ~~and audits~~ to verify the implementation of handling, storage and shipping requirements.

17.2.14 INSPECTION, TEST AND OPERATING STATUS

17.2.14.1 Policy

A program shall be established to indicate the inspection, test and operating status of structures, systems and components covered under the scope of this document.

The status of safety-related structures, systems and components shall be controlled in accordance with approved procedures. These procedures shall include the use of appropriate tags, markings, lists, logs, diagrams, or other suitable means, to assure that required inspections and tests are satisfactorily completed to prevent inadvertent bypassing of required inspections and tests and to prevent inadvertent operation.

17.2.14.2 Requirements

An acceptable inspection, test and operating status program shall include:

- a. The identification of inspection, test and operating status of structures, systems and components.
- b. Procedures which include controls for the application and removal of inspection and welding stamps, and other status indicators such as tags, markings, labels, and stamps.

17.2.13.3.3 Manager, Quality Assurance Section
The Manager, QAS, shall verify the implementation of
handling, storage and shipping requirements.

- c. Established inspection and test requirements which shall not be bypassed or have the sequence altered, except by a revision to the inspection or test procedure, or as detailed by approved project procedures/instructions.
- d. Records on the installation or erection, and its inspections and tests, which shall reflect the operating status of systems, structures and components.
- e. Identifying and preventing the inadvertent use of nonconforming, inoperative, or malfunctioning structures, systems or components by documenting the condition and appropriately tagging the item(s).

17.2.14.3 Responsibilities and Authorities

17.2.14.3.1 General Manager, PNPPD; Director, PNED, and Director, PNSD

The General Manager, PNPPD, Director, PNED, and Director, PNSD are responsible for maintaining the test and operating status of plant safety-related structures, systems and components.

17.2.14.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for maintaining the inspection status of plant safety-related structures, systems and components and for the identification and tagging, when applicable, of nonconforming items at the plant. ~~Further,~~ ^{and} through review and approval of plant administrative control procedures, ~~audits, and inspections~~ the Director, PNAD, shall verify the adequate establishment of programs for inspection, test and operating status both at the plant and in the facilities of vendors and contractors as appropriate.

17.2.14.3.3 Manager, Quality Assurance Section
The Manager, QAS,

nonconformances, and the timeliness and adequacy of the reporting and resolution of nonconformances. Significant results shall be reported to management for review and assessment.

17.2.15.3 Responsibilities and Authorities

17.2.15.3.1 General Manager, PNPPD; Director, PNED; and Director, PNSD

The General Manager, PNPPD; Director, PNED; and Director, PNSD are responsible for identifying, controlling, assisting in providing dispositions, and resolving nonconforming items at the plant in accordance with written approved procedures which conform to the requirements of this section. In addition, the General Manager, PNPP, and Director, PNED, are responsible for analyzing and trending failures of plant equipment.

Additionally, the Director, PNED, is responsible for providing technical reviews of nonconformances, obtaining information from responsible design organizations, and assisting in developing dispositions to nonconformances when requested.

17.2.15.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for the identification, documentation, and segregation of nonconforming items at the plant. This director is responsible for reviewing nonconformance dispositions for adequacy, providing approval, performing inspection of replacement, reworked or repaired items, and closeout of nonconformances generated at the plant. ~~Further, through review and approval of plant administrative~~

control procedures and vendor/contractor QA program audits, and inspections, the Director, PNAD, shall verify the adequate implementation of nonconformance control both at the plant and in the

~~facilities of vendors and contractors.~~ The Director, PNAD, is responsible for the performance and reporting of periodic quality trend analysis of nonconformances.

17.2.16 CORRECTIVE ACTION

17.2.16.1 Policy

Measures shall be established which ensure that conditions adverse to quality, such as malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances be identified promptly and corrected. The cause of significant conditions adverse to quality shall be determined and corrective action shall be taken to preclude repetition. The identification, cause and actions taken to correct conditions adverse to quality shall be documented and reported to the appropriate levels of management.

Significant conditions as delineated in 10 CFR 50.72 or 10 CFR 21 shall be reported to appropriate management levels within the affected organization.

17.2.16.2 Requirements

Procedures shall be established which detail and implement at least the following corrective action system measures:

- a. Conditions adverse to quality shall be corrected and shall be evaluated as to the significance of the condition.
- b. Significant conditions adverse to quality shall have action taken to prevent recurrence.

17.2.15.3.3 Manager, Quality Assurance Section

the Manager, QAS, shall verify the adequate implementation of nonconformance control both at the plant and in the Facilities of vendors and contractors.

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March, 1995

- c. Follow-up activities shall be conducted to verify implementation of corrective action and to close out corrective action documentation.
- d. Corrective action documentation shall include at least identification, cause and action taken to correct conditions adverse to quality and preclude the recurrence of significant conditions adverse to quality.
- e. Significant deficiencies, nonconformances and defects, shall be evaluated for possible reporting to the NRC. The PORC and the NSRC shall also assess these significant deficiencies.

17.2.16.3 Responsibilities and Authorities

17.2.16.3.1 Perry Nuclear Assurance Department

PNAD shall verify compliance with corrective action measures through audits, and inspections of internal and external organizations, contractors and vendors, and through other QA evaluation and control techniques, such as quality trend analysis.

17.2.16.3.2 General Manager, PNPPD; Director, PNSD; and Director, PNED

The General Manager, PNPPD; Director, PNSD; and Director, PNED, are responsible for assuring that identified conditions adverse to quality are promptly corrected and, when significant, measures are taken to preclude recurrence.

17.2.16.3.3 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for ensuring the establishment of the corrective action procedure and QA corrective action measures and establishing the appropriate interfaces with Perry departments for effecting

corrective action with contractors, vendors, agents, and consultants.
resolving corrective action impasses with corporate management and
delegating stop-work authority to appropriate PNAD personnel and agents.

17.2.16.3.45 Director, Procurement Department, CSC

The Director, Procurement Department, CSC, is responsible for ensuring the establishment of commercial corrective action measures in procurement documents, whenever possible, and in Perry Administrative procedures and instructions.

17.2.17 QUALITY ASSURANCE RECORDS

17.2.17.1 Policy

Quality records for items and activities covered under the scope of this document shall be identified, reviewed, retained, and retrievable.

These requirements are imposed on all organizations performing safety-related functions. Quality record systems shall be described and controlled by approved written procedures and instructions and verified by PNAD through inspection and audit.

17.2.17.2 Requirements

The procedures established for the generation, collection, storage, maintenance, and retrieval of the Perry quality records shall meet the following minimum requirements:

- a. Sufficient records and documentation shall be maintained to provide evidence of the quality of items and/or activities affecting quality.

17.2.16.3.4 Manager, Quality Assurance Section
The manager, QAS, is responsible for

- g. Documented measures shall be established to assure retrievability of records and to preclude their loss by such means as duplicate files, microfilming, etc.

17.2.17.3 Responsibilities and Authorities

17.2.17.3.1 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for approving the general requirements for the maintenance of quality assurance records; reviewing and approving major participating organizations' procedures for the maintenance of Quality Assurance records; establishing a program for the identification, storage, retrieval, and maintenance of Quality Assurance records including indexing, permanent storage, maintenance, and retrievals, and performing planned and periodic audits to verify adequacy and implementation of QA record requirements by both internal organizations and external suppliers.

17.2.17.3.2 Manager, Quality Assurance Section
The Manager, QAS, is responsible for

Audit frequencies shall be based upon the status and safety importance of activities, degree of previous experience, consistency of overall coverage, unique testing/operating activities, and the need for follow up on previous audit findings. Audit frequencies, as a minimum, shall be those imposed by the commitment to Regulatory Guide 1.33 and ANSI N18.7.

Audits shall be performed in accordance with pre-established written procedures or checklists, and shall be conducted by trained personnel having no direct responsibilities in the areas being audited.

Audit results shall be documented, reported to management having responsibility for the area being audited, and require corrective action to be initiated to correct any deficiencies. The QA organization conducting the audit is responsible for conducting follow-up actions including reaudit of deficient areas, as required, to assure correction of the deficiencies.

Audits shall verify compliance with applicable criteria of 10 CFR 50, Appendix B and shall include verification, as applicable, of indoctrination and training programs; interface control among internal organizations and major contractors; corrective action; calibration; nonconformance control systems; and, the implementation of USAR commitments; and, activities associated with computer codes.

17.2.18.3 Responsibilities and Authorities

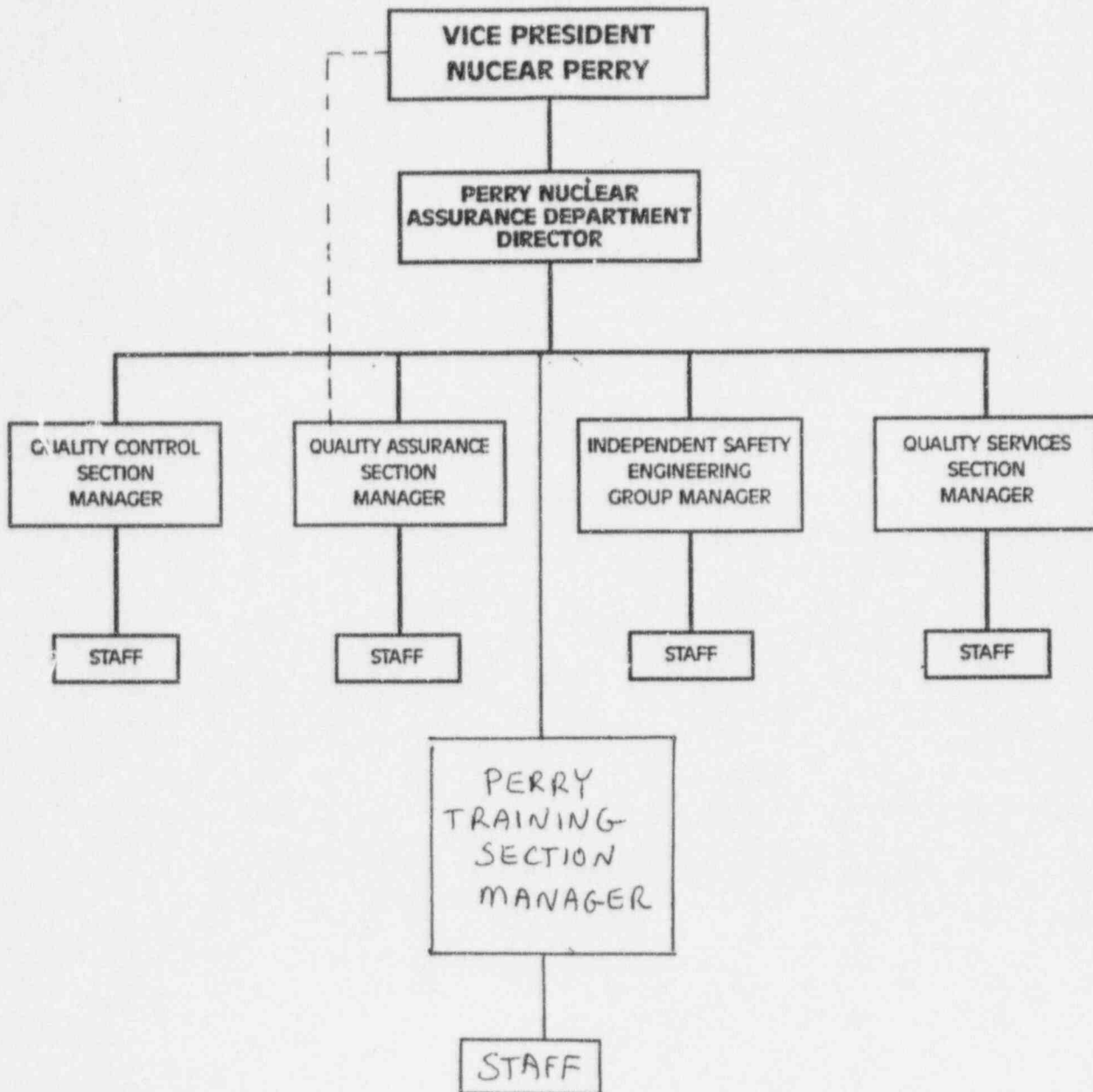
Manager, Quality Assurance Section

17.2.18.3.1 ~~Director, Perry Nuclear Assurance Department~~

Manager, QAS

The ~~Director, PNAD~~, is responsible for providing for a system of planned and ~~systematic~~ audits of organizations performing safety-related

activities ~~providing for a system of planned and periodic audit of~~ ~~including contractors, vendors) and other organizations performing quality related~~ activities, and periodically evaluating and reporting on the status



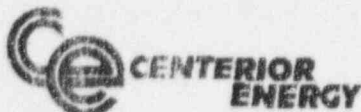
(Rev. 7 3/95)



PERRY NUCLEAR POWER PLANT
THE CLEVELAND ELECTRIC
ILLUMINATING COMPANY

Perry Nuclear Assurance
Department Organization

Figure 17.2-2

**PERRY NUCLEAR POWER PLANT**

10 CENTER ROAD
PERRY, OHIO 44081
(216) 259-3737

Mail Address:
P.O. BOX 97
PERRY, OHIO 44081

November 12, 1996
PY-CEI/NRR-1115L

United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant

Docket No. 50-440

10CFR50.54(a)(3) Organization Change for the Perry Nuclear Assurance Department
and the Perry Training Section - Supplemental Information

Ladies and Gentlemen:

On July 23, 1996, Perry submitted letter PY-CEI/NRR-2079L, pursuant to the provisions of 10CFR50.54(a)(3), to request review of proposed changes to the Perry Nuclear Assurance Department (PNAD).

Under the proposed change, the Perry Training Section will be transferred from the Perry Nuclear Services Department (PNSD) to PNAD. Several Nuclear Quality Assurance Program responsibilities will be reassigned from the Director, PNAD to the Manager, Quality Assurance Section as a result of PNAD accepting training program responsibilities.

A telephone conference was held on October 11, 1996 between NRC and CEI staff to discuss questions regarding the submittal. Attachment 1 to this letter provides the additional information and modifications to the submittal as a result of the October 11 conversation. Attachment 2 provides the marked up USAR pages for the Chapter 17.2 changes provided in the original submittal. These pages supersede pages 11, 12, 13, 14, 16, 21, and 25 of the July 23 submittal.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs at (216) 280-5833.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Lew W. Myers'.

Lew W. Myers
Vice President - Nuclear

HMC:sc

Operating Companies
Cleveland Electric Illuminating
Edison

9611210143
HMC

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Attachments

cc: NRC Region III
NRC Resident Inspector
NRC Project Manager

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Attachment 1

Page 1 of 1

Insert the following changes where indicated in Attachment 2 of letter
PY-CEI/NRR-2079L:

Page 17.2-11

Part 17.2.1.3.2.2

Reassign responsibility for quality assurance training from the Director, PNAD to the Manager, QAS. Delete Director, PNAD responsibility requirement g and add it to the list of Manager, QAS responsibilities given in INSERT A to page 17.2-12.

Page 17.2-12

Part 17.2.1.3.2.2

Delete the word "experience" appended to the end of Manager, QAS qualification requirement b.

Page 17.2-13

Part 17.2.1.3.2.2

The paragraph following item d will be moved to start at the left margin.

Page 17.2-21

Part 17.2.2.3.2

Insert the following paragraph after the responsibility heading:

"The Manager, QAS maintains overall responsibility for the content and quality of the Operational QA Program as described in this chapter and shall exercise final approval authority for any changes to the QA program description prior to implementation."

Page 17.2-52

Part 17.2.13.3.3

Add the phrase "through conduct of audits" to new paragraph 17.2.13.3.3 indicating that verification of handling, storage, and shipping requirements is done through audits.

Page 17.2-57

Part 17.2.15.3.3

Add the phrase "through conduct of audits" to new paragraph 17.2.15.3.3 indicating that verification of nonconformance controls is done through audits.

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Page 1 of 8

* Indicates area of change

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- b. Provide for the review and approval of the QA program of contractors providing services, and of vendors supplying materials, parts or components covered by the scope of this document.
- c. Provide for review and approval of procedures prepared by other organizations when these procedures control or exercise an effect upon an activity that falls within the scope of this document.
- d. Provide direction and supervision of the PNAD organization.
- e. Maintain a working interface and communication with the NRC, other organizations, consultants, contractors, vendors, and others as required to effectively execute the policies presented in this description of the QA Program.
- f. Provide for a system of planned and periodic audit and inspection of organizations, contractors and vendors performing activities that fall within the scope of this document.
- g. ~~Provide for a system of planned and periodic internal audit to assure the implementation of QA policies, procedures and instructions by organizations addressed in the Operational QA Program.~~
- h. ~~Establish and assure the continuous implementation of an indoctrination and training program for PNAD QA/QC personnel and assure that a quality assurance indoctrination is provided to appropriate personnel outside the QA organization.~~
- i. ~~Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention immediately, any significant quality-related problem or deficiency.~~

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* Indicates area of change

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*re-lettering due to deleting Item g
on p. 17.2-11*

3. * *h* Provide for QA review and concurrence of safety-related plant modification and maintenance work authorizations. This includes the review of associated design documents to ensure proper review and approval, and inclusion of necessary quality assurance requirements.

4. * *h* Provide for QA review and approval of procurement documents generated for the acquisition of materials and services that fall within the scope of this document.

5. * *h* Provide for and maintain Quality Assurance records generated by PNAD until such time as they are turned over for permanent storage.

Periodically evaluate and report on the status and adequacy of the Quality Assurance Program to appropriate management.

6. * *h* Perform receiving inspection activities at the plant site.

7. * *h* Provide for adequate levels of inspection and surveillance of plant activities.

8. * *h* Provide the resources necessary to ensure that the Independent Safety Engineering Group can perform the activities described in Appendix 1A, Item I.B.1.2 and Section 13.4.3.

9. * *h* Provide general and procedural administrative services, document control, and records management.
Develop a Perry Training Program based on input and direction of the Perry departments.
Qualification requirements for the Director, PNAD, at the time are:
Manager, QAS,

CERT A

a. Management experience through progressive assignment of increasing responsibility.

b. Formal degree in a science or engineering discipline or professional registration or equivalent *experience*. **DELETE*

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Page 3 of 8
* Indicates area of change

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INSEPT A

The specific responsibilities of the Manager, QAS, include the following:

- a. Provide for a system of planned and periodic internal audits to assure the implementation of QA policies, procedures and instructions by organizations addressed in the Operational QA Program.
- b. Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention immediately, any significant quality-related problem or deficiency.
- c. Periodically evaluate and report on the status and adequacy of the Quality Assurance Program to appropriate management.
- d. Initiating stop work, or control further processing, delivery, or installation of nonconforming material or activity as described in the applicable quality assurance procedures and instructions and in the applicable plant procedures and instructions.
- e. Establish and assure the continuous implementation of an indoctrination and training program for PNAD QA/QC personnel and assure that a quality assurance indoctrination is provided to appropriate personnel outside the QA organization.

ADD

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Attachment 2

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* Indicates area of change

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Attachment 3

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plant experience in the overall implementation of the Quality Assurance Program. A minimum of 1 year of this 6 years experience shall be related technical or academic training. A maximum of 4 years experience may be fulfilled by related technical or academic training.

d. Training in QA policies, standards, regulations, and practices.

← The Director, PNAD, is assisted in carrying out his responsibilities by a staff organized into sections to provide adequate coverage of procurement, manufacturing, inservice inspection, refueling, maintenance, repair, modification, and operation of Perry (Figure 17.2-2). The staff includes required expertise to perform audit, quality engineering, surveillance, and inspection functions. In addition, quality assurance agents may be engaged to augment the PNAD staff. PNAD shall maintain direct control over any quality assurance agent.

17.2.1.3.2.2.1 Manager, Quality Assurance Section

The Manager, Quality Assurance Section, is responsible for implementing a system of planned periodic internal audits and surveillances. Section activities include input to and review of procedures and corrective action programs; reviewing changes to the Operations QA Plan; surveillance of plant operations; and providing administrative support for PNAD.

17.2.1.3.2.2.2 Manager, Quality Control Section.

The Manager, Quality Control Section, is responsible for review and approval of procurement documents; maintains a program for approval, audit and surveillance of suppliers; and

{ has overall responsibility for verifying the effective implementation of the Quality Assurance Program. He

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* Indicates area of change

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Any corrective action which may be deemed necessary, as a result of these yearly assessments, shall be formally identified and tracked to resolution.

17.2.2.3.2 *Manager, Quality Assurance Section (QAS)*
~~Director, Perry Nuclear Assurance Department (PNAD)~~ *e*

1.5ERT + Manager, QAS,

The ~~Director, PNAD~~, as the official given direct responsibility for verifying the effective implementation of the Perry Operational QA Program, shall establish and implement a formally documented and procedurally controlled program to evaluate and report to the Vice President, Nuclear - Perry on the adequacy and continued effectiveness of the overall Perry OQA Program. Reports of audits performed by PNAD or their agents, and quality trend analysis will provide the basis for this evaluation. Corrective action shall be implemented by responsible management, as deemed appropriate, when analysis reveals adverse quality trends. These actions may involve specific actions to provide compliance with the QA Program, and may include follow-up audits or revision to the OQA Program. Implementation and close-out of corrective actions shall be monitored by the ~~Director, PNAD~~, to assure timely correction and compliance. *Manager, QAS,*

17.2.2.3.3 Director/General Manager of Each Organization

The Director/General Manager of each organization is responsible for implementing training and indoctrination programs for their respective organizations which meet the requirements in Section 17.2.2.2., Item g.

17.2.2.4 Delegated Authorities

Quality assurance programs and implementing procedures for suppliers or contractors providing materials and services for Perry which are covered under the scope of this QA Program shall be subject to review and acceptance by PNAD prior to the commencement of any activity covered under the scope of this QA Program. Procurement documents shall

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* Indicates area of change

✧ INSERT AT THE BEGINNING OF SECTION 17.2.2.3.2

The Manager, QAS maintains overall responsibility for the content and quality of the Operational QA Program as described in this chapter and shall exercise final approval authority for any changes prior to implementation.

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* Indicates area of change

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17.2.13.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for receipt inspection verification of special handling and packaging maintenance during shipment, and conducting inspections ~~and audits~~ to verify the implementation of handling, storage and shipping requirements.

17.2.14 INSPECTION, TEST AND OPERATING STATUS

17.2.14.1 Policy

A program shall be established to indicate the inspection, test and operating status of structures, systems and components covered under the scope of this document.

The status of safety-related structures, systems and components shall be controlled in accordance with approved procedures. These procedures shall include the use of appropriate tags, markings, lists, logs, diagrams, or other suitable means, to assure that required inspections and tests are satisfactorily completed to prevent inadvertent bypassing of required inspections and tests and to prevent inadvertent operation.

17.2.14.2 Requirements

* Through conduct of audits. ADD

An acceptable inspection, test and operating status program shall include:

- a. The identification of inspection, test and operating status of structures, systems and components.
- b. Procedures which include controls for the application and removal of inspection and welding stamps, and other status indicators such as tags, markings, labels, and stamps.

17.2.13.3.3 Manager, Quality Assurance Section
The Manager, QAS, shall verify the implementation of
handling, storage and shipping requirements

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~~facilities of vendors and contractors.~~ The Director, PNAD, is responsible for the performance and reporting of periodic quality trend analysis of nonconformances.

17.2.16 CORRECTIVE ACTION

17.2.16.1 Policy

Measures shall be established which ensure that conditions adverse to quality, such as malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances be identified promptly and corrected. The cause of significant conditions adverse to quality shall be determined and corrective action shall be taken to preclude repetition. The identification, cause and actions taken to correct conditions adverse to quality shall be documented and reported to the appropriate levels of management.

Significant conditions as delineated in 10 CFR 50.72 or 10 CFR 21 shall be reported to appropriate management levels within the affected organization.

17.2.16.2 Requirements

Procedures shall be established which detail and implement at least the following corrective action system measures:

- a. Conditions adverse to quality shall be corrected and shall be evaluated as to the significance of the condition.
- b. Significant conditions adverse to quality shall have action taken to prevent recurrence.

17.2.15.3.3 Manager, Quality Assurance Section

The Manager, QAS, shall verify the adequate implementation of nonconformance control both at the plant and in the facilities of vendors and contractors through conduct of audits.

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March, 1995

ADD*