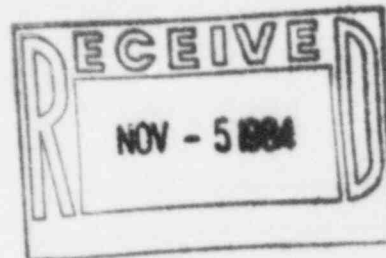


# The Light company

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

November 2, 1984  
ST-HL-AE-1146  
File No.: G9.11/Q39.

Mr. Robert D. Martin  
Regional Administrator, Region IV  
Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 1000  
Arlington, TX 76011



South Texas Project  
Units 1 & 2  
Docket Nos. STN 50-498, STN 50-499  
Quality Assurance Program  
for the Design and Construction Phase  
of the South Texas Project

Dear Mr. Martin:

Enclosed is Revision 8 of the Quality Assurance Program Description (QAPD) for the design and construction phase of the South Texas Project (STP). This revision is being submitted in accordance with the requirements of 10CFR50.55(f)(3).

This submittal consists of the following: a complete replacement for Part A, Houston Lighting and Power Company (HL&P) QAPD; copies of correspondence between Bechtel and the NRC to be used in conjunction with the Bechtel Topical Report BQ-TOP-1, Revision 3A (Part B); and replacement pages for three sections of Part C, Ebasco Services, Inc. (ESI) QAPD Quality Assurance Program for the South Texas Project.

Part A has been revised to reflect changes within various organizations; and to clarify the areas of responsibilities of the Project and Corporate QA audit programs.

Part B has been amended to reflect the reorganization of the Bechtel group of companies and the consolidation of the Bechtel Power Corporation's four power divisions into two regional operations.

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Part C was revised to clarify the initial QA review of Quality Control certifications; to include the processing of interim approvals for field change requests; and to clarify review and acceptance responsibilities for responses to audit reports. As stated in previous submittals, changes to Part C are noted by change bars in the right margin; the revision status in the upper right hand corner of each individual section may differ from the Revision 8 indicators in the body of the document and are not applicable to this submittal.

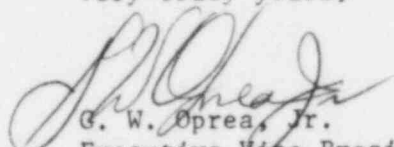
This submittal is consistent with the draft copy that your office has already informally reviewed, with one exception. The position description for the Lead, Quality Engineering Assessment Group has been deleted to be consistent with the level of management described for other departments; the position will be described in the Project QA Plan and the implementing procedures.

The changes described in Revision 8 of the QAPD do not reduce the commitments contained in Revision 7, and these changes are being implemented immediately. The revised QAPD continues to satisfy the criteria of 10CFR50 Appendix B. Attached is a detailed description of each change, including the basis for concluding that the previous commitments have not been reduced. Also, attached is an instruction sheet which describes how to update the manual.

Copies of Revision 8 to the QAPD are also being submitted to the NRC Resident Inspector at the South Texas Project site and to the NRC Document Control desk as required by 10CFR50.55(f)(3)(i).

If you have any questions, please contact Mr. Michael E. Powell at 713/993-1330.

Very truly yours,

  
G. W. Oprea, Jr.  
Executive Vice President

GWO/JWE/BSN:jt  
Attachments

cc:

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c/o Ms. Peggy Buchorn  
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Brazoria, TX 77422

Docketing & Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

QUALITY ASSURANCE PROGRAM DESCRIPTION  
FOR THE  
DESIGN AND CONSTRUCTION OF THE  
SOUTH TEXAS PROJECT  
REVISION 8 CHANGES

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

- ° Paragraphs 1.5, 1.5.16, and 1.5.19: Changed reporting relationship for the Manager, Nuclear Licensing to the Vice President, Nuclear Engineering and Construction. Clarification; no reduction in commitment has occurred.
- ° Paragraph 1.5.5: Position title change from Site Engineering and Construction Manager to Site Construction Manager. Clarification; no reduction in commitment has occurred.
- ° Paragraphs 1.5.6 and 1.5.7: Three supervisory engineering positions were transferred from the Houston office to the site to enhance the owner's review of design work performed by the prime contractors. This is an upgrade; no reduction in commitment has occurred.
- ° Paragraph 1.5.10: Changed reporting relationship for project direction for the Supervising Engineer, STP Licensing to the Manager, Engineering. Additionally, the position of STP Licensing Team Leader was deleted and his responsibilities were transferred to the Supervising Engineer, STP Licensing. Clarification; no reduction in commitment has occurred.
- ° Paragraphs 5.0 and 18.0: Clarified the areas of responsibility for the Project and Corporate QA audit programs. No reduction in commitment has occurred.
- ° Figure 1: Modified to reflect above organizational changes. Clarification; no reduction in commitment has occurred.

Part B, Bechtel Energy Corporation (BEC QAPD)

- ° Bechtel Group, Inc., and its operating companies, including the Bechtel Power Corporation (BPC) were restructured to include two new subsidiary organizations - Bechtel Construction, Inc. (BCI) and Bechtel Constructors Corporation (BECC). This change does not affect the South Texas Project and information relative to this change is provided for continuity only.
- ° The Bechtel Power Corporation was restructured from four power divisions to two regional operations - the Western Power Division, consisting of the former San Francisco and Los Angeles power divisions; and the Eastern Power Division consisting of the former Ann Arbor and Gaithersburg power divisions. No quality assurance programmatic changes are anticipated at the project level because of the reorganization; no reduction in commitment has occurred.

Part C, Ebasco Services, Inc. (ESI QAPD)

- ° Section QA-I-3, Paragraph 8.0:  
Revised the fourth sentence from "auditing" to "reviewed" and revised the position title from "Director Quality Assurance" to "Manager Quality Assurance Engineering." This is a clarification; no reduction in commitment has occurred.
- ° Section QA-III-2, Paragraph 3.2.2:  
Revised to include the processing of an interim approval to field change requests. Clarification; no reduction in commitment has occurred.
- ° Section QA-III-2, Paragraph 3.5.2.1:  
Added a subparagraph to explain how to obtain an interim approval of a field change request. Clarification; no reduction in commitment has occurred.
- ° Section QA-III-9, Paragraph 3.10.1:  
Reworded sixth line to read "...Lead Auditor or the management of the auditing group..." This is a clarification to be consistent with ANSI N45.2.12; no reduction in commitment as occurred.

Instructions for updating of the manual.

Remove

1. Controlled Manual Identification Sheet, Revision 7
2. Letter from G. W. Oprea, Jr. (HL&P) to J. T. Collins (NRC) dated July 27, 1984 and attached description of changes.
3. All Part A, Revision 7
4. Part, B, Revision 7 Cover Sheet
5. - - - - -
6. Part C, Revision 7 Cover Sheet.
7. Part C, Table of Contents, dated 07/05/84.
8. Part C, Section QA-I-3, dated 07/05/84.
9. Part C, Section QA-III-2 dated 07/05/84
10. Part C, Section QA-III-9 dated 07/05/84.

Insert

1. Controlled Manual Identification Sheet, Revision 8
2. Letter from G. W. Oprea, Jr. (HL&P) to R. D. Martin (NRC) dated November 2, 1984 and attached description of changes.
3. New Part A, Revision 8
4. Part B, Revision 8 Cover Sheet
5. Explanatory sheet and attached correspondence between BPC and the NRC, directly in front of the BQ-TOP-1, Rev. 3A Cover Sheet.
6. Part C, Revision 8 Cover Sheet.
7. Part C, Table of Contents, dated 09/24/84.
8. Part C, Section QA-I-3, dated 09/24/84.
9. Part C, Section QA-III-2, dated 09/24/84.
10. Part C, Section QA-III-2, dated 09/24/84.