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Docket Nos. 50-424
50-425

LCV-1000

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

**VOGTLE ELECTRIC GENERATING PLANT
QUALITY ASSURANCE PROGRAM CHANGE
DESIGN CHANGE VERIFICATION PROCESS**

Southern Nuclear Operating Company, Inc. (Southern Nuclear) hereby requests a change to the Quality Assurance Program as described in the Vogtle Electric Generating Plant Units 1 and 2 Final Safety Analysis Report (FSAR), Section 17.2.3.G, related to the design verification sequence for procurement of components.

Southern Nuclear proposes to change the FSAR to allow for completion of design verification prior to relying upon the item to perform its function. Attachment 1 provides the proposed wording changes to the FSAR.

Currently, the FSAR requires that design verification (if other than by qualification testing of a prototype or lead production unit) be completed prior to release for procurement, manufacturing, and installation, or to another organization for use in other design activities. This requirement was included in the original FSAR particularly for pre-operational facilities where large scale "untested" design work necessitated early resolution of design problems prior to a commitment of excessive amounts of design and construction resources. This change to the FSAR will not eliminate the design verification. The design verification will continue to be required prior to relying on the item to perform its function. Therefore the effect on the quality of the design change relative to safety will be neutral. The benefits of the change are that design verification activities will be allowed to proceed in conjunction with procurement, manufacturing and installation. In either case the required verification will be completed prior to placing the modification into operation. Operational design changes are not normally sufficiently complicated to warrant such a prescriptive approach to implementation. Furthermore, neither Regulatory Guide 1.64 "Quality Assurance Requirements for the Design of Nuclear Power Plants" nor ANSI N45.2.11-1974 "Quality Assurance Requirements for the Design of Nuclear Power Plants" as described in FSAR section 1.9.64 require design verification prior to procurement, manufacturing, etc.

Pursuant to the requirements of 10 CFR 50.54 (a), Southern Nuclear has concluded that there would be no significant reduction in commitments in the Quality Assurance Program as a result of this change. However,

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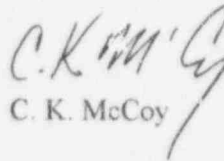
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Southern Nuclear is requesting NRC approval before implementing this change. Following NRC approval, Southern Nuclear will update its internal procedures and the FSAR to incorporate these charges.

Sincerely,


C. K. McCoy

CKM/AKJ

Attachment

xc: Southern Nuclear Operating Company
Mr. J. B. Beasley
Mr. M. Sheibani
NORMS

U.S. Nuclear Regulatory Commission
Mr. L. A. Reyes, Regional Administrator
Mr. L. L. Wheeler, Licensing Project Manager, NRR
Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

LCV-1000

ATTACHMENT 1
PROPOSED FSAR MARKUP

VECP-FSAR-17

- C. Qualification tests to verify the adequacy of design are performed, as applicable, using the most adverse specified design conditions practical to provide or to simulate.
 - D. Design changes are reviewed to ensure that design criteria are defined and that inspection and test criteria are identified.
 - E. New or innovative designs will be subjected to comprehensive design review, which may include calculational checks or a testing program under adverse design conditions.
 - F. Written procedures will require a documented check to verify the dimensional accuracy and completeness of design drawings and specifications.
 - G. ~~Design verification, if other than by qualification testing of a prototype or lead production unit, is completed prior to release for procurement, manufacturing, and installation, or to another organization for use in other design activities. In those cases where this timing cannot be met, the design verification may be deferred, providing that the justification for this action is documented and that the unverified portion of the design output document and all design output documents, based on the unverified data, are appropriately identified and controlled. In all cases, verification is completed prior to relying upon the item to perform its function.~~
- delete

There is a comprehensive audit system to verify that the design control system maintained by the responsible organizations during the operation of the VECP is adequate and functioning properly.

Any errors or deficiencies found in the design process or the design itself are documented and corrective action taken, as described in subsection 17.2.16.

Design documents and revisions thereto are controlled and distributed as described in subsection 17.2.6. Records of design activities and design changes are collected, stored, and maintained in a systematic manner to prevent inadvertent use of superseded documents.

VECP plant procedures require that plant personnel are made aware of design changes/modifications which may affect the performance of their duties. Methods by which plant personnel are made aware will include procedure revision training, night orders, and structured training for major modifications.