



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

October 18, 2001  
NOC-AE-01001207  
File No.: G09.19  
10CFR50.54(a)  
STI: 31359178

U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

South Texas Project  
Units 1 and 2  
Docket Nos. STN 50-498 and STN 50-499  
Change QA-051 to the Operations Quality Assurance Plan Revision 14

The South Texas Project submits the attached change (QA-051) to the Operations Quality Assurance Plan. This change eliminates the requirement for personnel to be qualified to ANSI N45.2.6 for the performance of activities required by ANSI N45.2.2, Section 5.2.1. This change mirrors a previously issued Safety Evaluation Report (SER) for Entergy Operations, Inc. (reference TAC NO. M97893). The referenced SER approves Entergy's Quality Assurance Program Manual which states that the activities required by ANSI N45.2.2, Section 5.2.1 do not constitute an "inspection" as defined in Entergy's commitment to Regulatory Guide 1.74, and therefore the personnel performing these activities are not required to be qualified inspectors. This same interpretation is applicable to STP. This change therefore does not represent a reduction in commitment and does not require NRC approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(3)(ii).

If there are any questions regarding this matter, please contact Mr. M. A. McBurnett at (361) 972-7206 or me at (361) 972-8434.

W. T. Cottle  
President and Chief  
Executive Officer

kaw

Attachment: Operations Quality Assurance Plan (Revision 14) Change QA-051

cc:

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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

License Compliance Review

Form 1

License Compliance Review Form (Sample)

Page 1 of 2

PROCEDURE NUMBER

Operations Quality Assurance Plan

REV.

14

FIELD CHANGE NUMBER

NA

REV.

NA

PROCEDURE TITLE OR DESCRIPTION

OPAP Change QA-051

This form may be used only for screening permanent, temporary (field), and emergency changes to procedures, OR for other written instructions when the controlling process procedure references use of the LCR Form. This form is not to be used for screening modifications (i.e., Design Changes and Temporary Modifications).

If the procedure is listed in Addendum 3, Procedures Exempt From 10CFR50.59 Screening, THEN skip questions 1 through 4 AND GO TO question 5.

- 1. Does the proposed activity involve a change to an SSC that affects an UFSAR described design function? YES  NO
- 2. Does the proposed activity involve a change to a procedure, or written instruction that affects how UFSAR described SSC functions are performed or controlled? YES  NO
- 3. Is the proposed activity inconsistent with an UFSAR described evaluation methodology, including assumed conditions or parameter values? YES  NO
- 4. Does the proposed activity involve a test or experiment not described in the UFSAR, or that is inconsistent with analyses or descriptions in the UFSAR? YES  NO

IF ANY ANSWERS TO QUESTIONS 1 THROUGH 4 ARE "YES", COMPLETE THIS FORM AND ATTACH ADDITIONAL SCREENING AND EVALUATION PER OPGP05-ZA-0002.

IF ALL OF THE QUESTIONS ARE ANSWERED "NO", INDICATE BELOW THE TECHNICAL JUSTIFICATION FOR BASES OF ANSWERS. IF NONE OF THE BELOW FOUR (3) TECHNICAL JUSTIFICATIONS ARE APPLICABLE THEN ATTACH THE 10CFR50.59 SCREENING PER OPGP05-ZA-0002

**BASES FOR RESPONSES TO QUESTIONS 1 THROUGH 4 - CHECK ONE AND ONLY ONE**

- BASIS 1: This change consists only of format modifications or rewording for clarification and/or editorial correction. The intent of the procedure or written instruction is not affected.
- BASIS 2: This change is associated with a procedure, or written instruction, which is not contained or described in the UFSAR or to which it has been determined that 10CFR50.59 does not apply.
- BASIS 3: This change is associated with a procedure, or activity, which is listed or described in the UFSAR but does not affect how a SSC function is performed or controlled.
- OTHER

COMMENTS:

(ATTACH ADDITIONAL SHEETS, IF NECESSARY).

- 5. Does the subject of this review require a change to ANY License Basis or Operating License documents? YES  NO   
If "YES", refer to OPGP05-ZN-0004, "Changes To Licensing Basis Documents And Amendments To The Operating License" and resolve the issue prior to proceeding with the activity that was the subject of the LCR Review.
- 6. Does the subject of this review require a change to, or conflict with, ANY item that MAY be considered a station Licensing Commitment? YES  NO   
IF "YES", REFER TO OPGP05-ZN-0002, "Licensing Commitment Management and Administration" and resolve the issue prior to proceeding with the activity that was the subject of the LCR Review
- 7. Does the subject of this review conflict with requirements of 10CFR50.55a as implemented in the station IST and ISI programs? YES  NO   
If "YES", do NOT make the proposed change until the associated program is revised.

		<b>0PAP01-ZA-0103</b>	<b>Rev. 5</b>	Page 20 of 20
<b>License Compliance Review</b>				
Form 1		License Compliance Review Form (Sample)		Page 2 of 2
PROCEDURE NUMBER <i>Operations Quality Assurance Plan</i>				REV. <i>14</i>
FIELD CHANGE NUMBER <i>NA</i>				
8.	Does the subject of this review conflict with the requirements of 10CFR50.65 as implemented in the station Maintenance Rule Program?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
IF "YES", do NOT make the proposed change until the associated program is revised.				
9.	If the subject of this review involves managerial or administrative procedures or written instructions governing ANY aspect of the conduct of operation of the facility, then does the subject of the review conflict with requirements of 10CFR50 Appendix B or the OQAP or Regulatory Guide 1.33? (mark "NO" if question is not applicable)	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>	
IF "YES", do NOT make the proposed change unless action to change the associated requirements is completed (refer to item 5 above).				
10.	If the subject of the review is governed by specific regulatory requirements, then does the proposed change conflict with the associated regulatory requirements? Examples: Radiological Controls requirements in 10CFR20, Operator Licenses requirements in 10CFR55, Physical Protection requirements in 10CFR73, Emergency Plan requirements in 10CFR50.54(q) & Appendix E			
APPLICABILITY: The question is normally only applicable to facility program procedures or specific regulatory requirements not addressed in station program procedures, OR License and Design Basis Documents.				
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - Do NOT make the proposed change. <input type="checkbox"/> N/A - Applicable Code compliance methods are in a station program procedure, License Document, or Design Document that is not being changed by the subject of this LCR.				
11.	Does the subject of this review represent or create a potential fire hazard, affect fire protection training or administration, emergency lighting or communications, or protection of the methods for achieving and maintaining safe shutdown in the event of a fire?			
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH A FIRE HAZARDS EVALUATION				
12.	Does the subject of this review represent or create a potential radiological hazard to the environment?			
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH A RADIOLOGICAL ENVIRONMENTAL EVALUATION				
13.	Does the subject of this review represent or create a potential non-radiological hazard to the environment?			
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH A NON-RADIOLOGICAL ENVIRONMENTAL EVALUATION				
14.	Does the subject of this review represent or create a potential ALARA concern?			
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH AN ALARA EVALUATION				
15.	Does the subject of this review represent or create a potential industrial safety hazard?			
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH AN INDUSTRIAL SAFETY REVIEW				
16.	Does the subject of this review represent or create a potential to reduce the commitments of the nuclear security program?			
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH A NUCLEAR SECURITY REVIEW				
17.	Does the subject of this review represent or create a potential to reduce the commitments or effectiveness of the Emergency Plan/Emergency Preparedness Program?			
<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES - ATTACH AN EMERGENCY PLAN/EMERGENCY PREPAREDNESS PROGRAM EVALUATION				
<b>DOCUMENTS REVIEWED</b>				
TECHNICAL SPECIFICATIONS REVIEWED:		SAR SECTIONS REVIEWED:		OTHER DOCUMENTS REVIEWED:
<i>NA</i>		<i>3.2</i>		<i>ANSI N45.2.2</i> <i>ASME/ANSI NQA-1</i>
PREPARER (SIGN/PRINT) <i>John Savage</i>				DATE <i>10/8/01</i>
REVIEWER (SIGN/PRINT) <i>John J. Johnson</i>				DATE <i>10/8/01</i>

THIS FORM, WHEN COMPLETED, SHALL BE RETAINED AS PART OF THE PROCEDURE REVIEW PACKAGE

	<b>OPGP05-ZN-0004</b>	<b>Rev. 11</b>	Page 19 of 23
<b>Changes to Licensing Basis Documents and Amendments to the Operating License</b>			
Form 1	Licensing Document Change Request (Sample)		Page 1 of 1

Change Description Revise Operations Quality Assurance Plan to eliminate the requirement for certain personnel performing receiving activities to be qualified/certified to ANSI N45.2.6

Originator John Savage Department Quality Date \_\_\_\_\_

Change Number (for Licensing use only) NA

Initiating Documentation Safety Evaluation Report for Entergy Operations, Inc. (reference TAC NO. M97893)

Implementing Documentation Condition Report 01-2292 and OQAP Change QA-051

Condition Report/Action No. 01-2292 / Action 7

Attach or provide reference to Regulatory Compliance Evaluation (e.g. 10CFR50.59, NEI 98-03, 10CFR50.54(a), etc). see Attachment 1

Unit(s) Affected: Unit 1  Unit 2

Implementation Status: Unit 1 Completion Date NA

Unit 2 Completion Date NA

Licensing has reviewed and agrees with the change: [Signature] 10-16-01  
Signature Date

Reviewed and Approved by [Signature] 10/16/01  
Approval Authority (Reference Section 2.4) Date

Reviewed and Approved by \_\_\_\_\_ Date  
(EPP & UFSAR 2.1, 2.2, 2.3) Manager, Chemistry

Reviewed and Approved by \_\_\_\_\_ Date  
(FHAR & UFSAR 9.5.1) Qualified Fire Protection Engineer

Verification of Incorporation \_\_\_\_\_ Date  
in applicable document Licensing/Quality Representative

ATTACHMENT 1  
10CFR50.54(a) EVALUATION  
QA-051  
Page 1 of 1

This change to the Operations Quality Assurance Plan (OQAP) eliminates the requirement for personnel to be qualified to ANSI N45.2.6 for the performance of activities required by ANSI N45.2.2, Section 5.2.1. This change mirrors a previously approved Safety Evaluation Report (SER) for Entergy Operations, Inc. (reference TAC NO. M97893). The referenced SER approves Entergy's Quality Assurance Program Manual which states that the activities required by ANSI N45.2.2, Section 5.2.1 did not constitute an "inspection" as defined by their committed to Regulatory Guide and therefore the personnel performing these activities were not required to be qualified inspectors. In reviewing the STPNOC commitments, it was determined that this same interpretation is applicable. This change therefore does not represent a reduction in commitment and does not require approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(3)(ii).

CHANGE QA-051  
SUMMARY OF CHANGES  
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ALL CHANGES ARE IN BOLD TYPE

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CHAPTER	LOCATION	ACTION	TEXT
TOC	CH. 2.0	INSERT	<b>QA-051</b>
	CH. 7.0	INSERT	<b>QA-051</b>
CH. 2.0	Table I for ANSI N45.2.2 under Full Program	INSERT	<b>Section 5.2.1 - These activities do not constitute an "inspection" as defined in ANSI/ASME-NQA-1, 1983, Supplement S-1, Terms and Definitions. Therefore, the requirements for qualification to ANSI N45.2.6 as stated in Section 2.4 do not apply to personnel performing these activities.</b>
	Table I for ANSI N45.2.2 under Basic Program	INSERT	<b>Same as Full</b>
	Table I for ANSI N45.2.6 under Full Program	INSERT	<b>Personnel performing the activities required by ANSI N45.2.2, Section 5.2.1 do not require qualification to this Standard. (see exception to ANSI N45.2.2)</b>
	Table I for ANSI N45.2.6 under Basic Program	INSERT	<b>Same as Full</b>
CH. 7.0	5.5	DELETE	<b>Inspections</b>
	5.5	INSERT	<b>Activities</b>
	5.5.1	DELETE	<b>Inspected and the applicable attributes of Section 5.2.2</b>
	5.5.1	INSERT	<b>Observed and (This activity does not constitute an inspection and does not require qualification in accordance with Reference 4.5)</b>

CHANGE QA-051  
SUMMARY OF CHANGES  
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ALL CHANGES ARE IN BOLD TYPE

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CH. 7.0	5.5.6.2	DELETE	<b>this and including examination for shipping damage</b>
	5.5.6.2	INSERT	<b>includes</b>

<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>TABLE OF CONTENTS</b>	<b>NUMBER</b>  <b>Chapter</b> <b>TABLE</b> <b>OF</b> <b>CONTENT</b>	<b>REV.</b> <b>NO.</b>  <b>14</b>
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Chapter Number	Title Chapter	Effective Revision	Effective Notice Date	Change Notice No.
	Definitions	8	2-1-00	QA-050
1.0	Organization	10	2-1-00	QA-044,QA-045, QA-048,QA-049, QA-050
2.0	Program Description	12	2-1-00	QA-044,QA-046, QA-047,QA-050, QA-051
3.0	Conduct of Plant Operations	7	2-1-98	
4.0	Qualification, Training, and Certification of Personnel	6	2-1-98	
5.0	Maintenance, Installation of Modifications, and Related Activities	5	2-1-98	
6.0	Design and Modification Control	7	2-1-98	QA-050
7.0	Procurement	8	2-1-00	QA-050, QA-051
8.0	Control and Issuance of Documents	6	2-1-98	
9.0	Control of Material	6	2-1-98	
10.0	Inspection	8	2-1-00	QA-044
11.0	Test Control	7	2-1-00	
12.0	Instrument and Calibration Control	6	2-1-98	
13.0	Control Of Conditions Adverse to Quality	9	2-1-00	QA-050



<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  <b>PROGRAM DESCRIPTION</b>	<b>NUMBER</b>  <b>Chapter</b> <b>2.0</b>	<b>REV.</b> <b>NO.</b>  <b>12</b>
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	<b>EFFECTIVE</b> <b>DATE 02-01-00</b>	

1.0 PURPOSE

1.1 The purpose of this chapter is to define criteria and establish administrative controls for implementation of the Quality Assurance (QA) Program for the South Texas Project Electric Generating Station (STP).

2.0 SCOPE

2.1 The QA Program is implemented and controlled in accordance with the Operations Quality Assurance Plan (OQAP) and is applicable to structures, systems, and components to an extent consistent with their importance to safety, and complies with the requirements of 10CFR50, Appendix B and other program commitments as appropriate.

2.2 The QA Program will also extend, as applicable and/or determined by STP management, to programs including 10CFR71, Subpart H (except design and fabrication of NRC certified radioactive waste shipping casks), ASME Boiler and Pressure Vessel Code, Sections III and XI; and to quality-related areas as defined herein including the Fire Protection Program, Emergency Plan, Radiological Environmental Monitoring Program, Radwaste Management Program, Computer Program Verification and Control, Seismic and Environmental Equipment Qualification Programs, Radiation Protection Program, and Station Blackout (SBO) systems and equipment.

3.0 DEFINITIONS

3.1 Comprehensive Risk Management - A process by which the change in risk to station personnel, the public's health and safety are evaluated as a result of changes in commitments, processes, activities, and human and equipment performance.

3.2 Graded Quality Assurance - The process by which risk-based methodology [i.e., Probabilistic Safety Assessment (PSA)] and deterministic and performance-based information analyses are combined to establish appropriate levels of programmatic controls for SSCs and appropriate levels of first line and independent oversight needed to provide the necessary assurance that SSCs will operate safely.

3.3 Full program controls - The highest levels of controls and oversight applied to safety-related SSCs categorized as High Safety Significant (HSS), as prescribed in Table I to this chapter and throughout individual OQAP chapters.

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- 3.4 Basic program controls - Levels of control and oversight, lower than in the Full Program, applied to safety-related SSCs categorized as Medium Safety Significant (MSS), as prescribed in Table I to this chapter and throughout individual OQAP chapters.
- 3.5 Targeted program controls - Selected program controls applied to certain non-safety-related SSCs categorized as either HSS or MSS.
- 3.6 Limited program controls - Limited controls applied to safety-related SSCs categorized as either Low Safety Significant (LSS) or Non-Risk Significant (NRS).

4.0 REFERENCES

- 4.1 10CFR50, Appendix B
- 4.2 10CFR71, Subpart H
- 4.3 ASME B&PV Code
- 4.4 OQAP Chapter 14.0, Records Control
- 4.5 10CFR50.63, Loss of All Alternating Current Power
- 4.6 10CFR50.54(a)
- 4.7 Updated Final Safety Analysis Report
- 4.8 Safety Evaluation on Exemption Requests from Special Treatment Requirements of 10 CFR Parts 21, 50, and 100 (TAC NOS. MA6057 AND MA6058)

5.0 REQUIREMENTS

- 5.1 General Program Requirements
  - 5.1.1 The OQAP shall be prepared and maintained to prescribe the STP QA Program. The OQAP reflects the quality program policies to be implemented. The OQAP describes the organization and responsibilities for attainment of quality objectives and verification of conformance to established requirements. The QA Program shall be in effect throughout the operating life of the STP.

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<b>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</b>  <b>OPERATIONS QUALITY ASSURANCE PLAN</b>  PROGRAM DESCRIPTION	<b>NUMBER</b>  <b>Chapter</b> <b>2.0</b>	<b>REV.</b> <b>NO.</b>  <b>12</b>
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5.1.2 The President and Chief Executive Officer has overall responsibility for quality assurance. The Vice President, Engineering & Technical Services (E&TS), is responsible for the development and maintenance of the OQAP.

5.1.3 The operations phase of the STP includes design, procurement, fabrication, repair, testing, operation, maintenance, refueling, inspection, independent oversight, modification, and other activities as discussed Table I to this chapter and throughout the OQAP. STP and its vendors are required, as appropriate, to comply with the criteria established by 10CFR50, Section 50.55a; 10CFR50, Appendix A, General Design Criterion (GDC) 1; 10CFR50, Appendix B, and 10CFR71, Sub-Part H (except design and fabrication of NRC certified radioactive waste shipping casks). These regulations are not applicable to LSS and NRS safety-related components, to the extent that the Nuclear Regulatory Commission has granted STP an exemption from the regulations as described in Reference 4.8.

STP will implement, as specified, the Regulatory Guides (RG) and implementing American National Standards Institute (ANSI) standards contained in Table I of this chapter.

5.1.4 STP shall maintain the OQAP as an effective and meaningful document to provide programmatic direction for the station. Changes to the OQAP shall be accomplished as prescribed by 10CFR50.54(a). When changes are made in the OQAP to the organizational elements only, appropriate notification will be made to the NRC within 30 days of implementation.

## 5.2 Organizational Independence

5.2.1 The reporting arrangement utilized by the Quality organization ensures that those personnel performing independent oversight have the organizational freedom to:

5.2.1.1 Identify quality problems.

5.2.1.2 Initiate, recommend, or provide solutions.

5.2.1.3 Verify implementation of solutions.

5.2.2 Personnel verifying compliance with quality requirements do not have direct responsibility for the performance of or directly supervise the activity being verified.

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5.3 Graded Quality Assurance

- 5.3.1 Graded Quality Assurance (GQA) is fundamental to the STP QA Program. It is described in more detail in the implementing procedure for the STP Comprehensive Risk Management (CRM) Program.
- 5.3.2 GQA is a process by which risk-based methodology [i.e., Probabilistic Safety Assessment (PSA)], deterministic insights, and performance-based information are combined and analyzed to determine what levels of programmatic controls are needed for structures, systems, and components (SSCs) and what levels of first line and independent oversight are needed to provide assurance that items will operate safely and activities are accomplished as prescribed.
- 5.3.3 Selected systems are evaluated, at the component level, by a cross-discipline Expert Panel comprised of high level station management. Initial evaluations are performed by the Working Group.
- 5.3.4 These recommendations are developed in consideration of the risk significance of system functions, components' contribution to core damage frequency and large early release frequency, components' critical attributes (needed to support risk significant system functions), performance, regulatory/QA requirements, and other deterministic considerations as prescribed in the Comprehensive Risk Management procedures.
- 5.3.5 Program control recommendations are developed by the Working Group and ultimately approved by the Expert Panel and forwarded to the site for implementation. Controls are implemented in four graded applications (i.e., "Full", "Basic", "Targeted", and "Limited").
- 5.3.6 "Full" program controls are applied to safety-related SSCs categorized as HSS. These "Full" levels of controls and oversight are designed to provide a high degree of confidence that SSCs perform safely and activities are performed as expected. Table I to the OQAP chapter prescribes the program commitments applicable to "Full" program activities.

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- 5.3.7 "Basic" program controls are applied to safety- related SSCs categorized as MSS. These are lower levels of control and oversight, designed to maintain/preserve those identified critical attributes of SSCs needed to support risk significant system functions. These controls are intended to reflect economical and efficient business practices. Table I to the OQAP chapter prescribes the program commitments applicable to "Basic" program activities.
- 5.3.8 "Limited" program controls are applied to safety-related SSCs categorized as either LSS or NRS. Only specific program controls related to the activities listed in the following subparagraphs are applicable to these SSCs. The other chapters of the OQAP are not applicable to safety-related LSS and NRS SSCs. Instead, the treatment processes applicable to these SSCs are described in the Updated Final Safety Analysis Report Section 13.7.3.3 and implementing procedures:
- 5.3.8.1 Those elements in Chapter 1.0 that are needed to implement and control activities described above;
  - 5.3.8.2 Applicable requirements in this Chapter;
  - 5.3.8.3 Modification/design activities as described in Chapter 6.0; and
  - 5.3.8.4 Corrective action as described in Chapter 13.0.
- 5.3.9 "Targeted" program controls are applied to non-safety related SSCs, for which 10CFR50, Appendix B is not applicable, categorized as HSS or MSS . Specific program controls consistent with applicable portions of the "full" and "basic" program controls are applied to those items in a selected manner, "targeted" at those characteristics or critical attributes that render the SSC risk significant.
- 5.3.10 Safety-related components that are highly reliable, yet whose failure would result in a significant increase in risk, will receive Full program coverage, or will be evaluated based on their risk significance to ensure that Full program controls are applied to their critical attributes.
- 5.3.11 SSCs governed by the OQAP shall retain their current program coverage until such time as prescribed risk-informed, performance-based analyses are completed and approved, and they are placed into the graded program categories (i.e., "Full", "Basic", "Targeted", or "Limited") as appropriate.

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5.3.12 A vital element of the GQA program is the "feedback" loop. On a periodic basis, and as prescribed in the Comprehensive Risk Management procedure, the GQA Working Group and Expert Panel shall review any changes to the PSA information and performance/operating experience that could result in recategorization of an SSC. These reviews are also used to assess the effectiveness and appropriateness of in-place quality program controls. Adjustments shall be made as determined necessary.

5.4 Delegation of QA Functions

5.4.1 The OQAP may be executed in whole or part by subcontract personnel. However, STP will retain responsibility for the total quality assurance program, and Quality organization personnel will perform appropriate oversight activities of subcontracted activities.

5.5 Identification of Safety Significant Structures, Systems, and Components

5.5.1 The program described herein is applied to activities affecting the safety functions of those structures, systems, and components which prevent, or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The structures, systems, and components controlled are listed in UFSAR Section 3.2, along with their associated fire protection systems. UFSAR Section 3.2 also identifies those structures, systems, and components which may not represent a safety significant/risk important concern but to which the STP OQAP is applied.

5.5.2 The fire protection QA Program is part of the overall STP Operations QA Program. Fire protection QA Program criteria are implemented as part of the Operations QA Program.

5.5.3 Expendable or consumable items necessary for the functional performance of structures, systems, and components are subjected to quality assurance requirements as specified in written procedures. These procedures include provisions for review and control in accordance with industry standards and specifications.

5.6 QA Program Documents

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5.6.1 The QA Program shall be implemented with documented instructions, procedures, and drawings which include appropriate quantitative and qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. Procedures shall include the control of the sequence of required inspections, tests, and other operations when important to quality. To change these controls, the individual procedure must be changed and shall require the same level of review and approval given to the original procedure. Such instructions, procedures, and drawings are reviewed and approved for compliance with requirements appropriate to their safety significance by individuals qualified to do so.

5.7 Personnel Indoctrination and Training

5.7.1 General indoctrination and training programs shall be provided for site personnel to assure that they are knowledgeable regarding quality programs and requirements. The training requirements for STP personnel are described in UFSAR Section 13.2. Personnel performing complex, unusual, or potentially hazardous work shall be instructed in special indoctrination or briefing sessions. Emphasis shall be on special requirements for safety of personnel, radiation control and protection, unique features of equipment and systems, operating constraints, and control requirements in effect during performance of work. Where required by codes and standards, personnel are trained, qualified, and certified according to written procedures in the principles and techniques of performing specific activities.

5.8 Policies and Goals

5.8.1 STP policy is to assure that the design, procurement, construction, testing, and operation of the STP are in conformance with specifications, procedures, codes, commitments and Nuclear Regulatory Commission (NRC) regulations to the extent not exempted. The responsibility of each organization supporting the STP is to ensure that the requirements stated in this QA Program are incorporated into procedures. Adherence to those procedures is mandatory for all STP organizations and contractors or vendors providing items or services covered by the QA Program.

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5.8.2 The OQAP identifies activities and establishes requirements for procedures which identify, report, and verify the resolution of quality problems. The implementing procedures call for the resolution of quality problems at the lowest possible authorized level. However, if a dispute is encountered in the resolution of a quality problem which cannot be resolved at lower levels, the Vice President, Engineering & Technical Services or senior management of the Quality & Licensing function shall present the problem to the President and Chief Executive Officer for resolution.

5.9 Control of Activities

5.9.1 The OQAP requires Quality department review and/or approval of procedures which control selected activities. These procedures shall require the use of the proper equipment, completion of prerequisites for starting an activity, and suitable environment for performing the activity. Procedures will comply with the appropriate standards.

5.9.2 STP personnel attend planning, scheduling, and status meetings as necessary to assure adequate quality coverage and program application exists.

5.10 Management Review

5.10.1 The implementation of both line and OQAP requirements shall be verified through independent oversight activities. The Quality organization shall conduct independent oversight activities of the operating plant and of the interfacing organizations' activities.

5.10.2 Independent oversight of implementation of the OQAP is conducted under the cognizance of the Nuclear Safety Review Board and results are transmitted to appropriate line and senior management, including the President and Chief Executive Officer for review and/or action.

5.10.3 STP may use the services of architect-engineer firms, Nuclear Steam Supply System (NSSS) suppliers, fuel fabricators, constructors, and others which provide or augment STP efforts during operations. As applicable, the QA programs of such contractors or consultants shall be subject to review, evaluation, and acceptance by the Quality organization before initiation of activities affected by the program.

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5.11 Computer Code Programs

5.11.1 The development, maintenance, and use of computer code programs will be controlled. Prior to use of a computer code program, the appropriateness of the program shall be verified. In addition, all such programs shall be appropriately certified for use.

6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.4.

7.0 ATTACHMENTS

7.1 Table I - Program Commitments

TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
R.G. 1.8, rev. 1 (9/75)	No exceptions taken.	No exceptions taken.
ANSI N18.1, 1971	4.2.2-The Operations Manager requirements regarding holding a Senior Reactor Operator license are met by the Unit Operations Managers.	Same as full.
R.G. 1.28, rev. 0 (6/72)	This R.G. is not applicable to operations phase activities.	Same as full.
ANSI 45.2, 1971	This standard is not applicable to operations phase activities.	Same as full.
R.G. 1.33, rev. 2 (2/78)	<p>C.2 - the specific revisions of the listed standards to which STP is committed are in this table and are not necessarily the "latest" revision.</p> <p>C.4 – Chapter 15.0 of the STP OQAP describes the audit program at STP that meets the intent of R.G. 1.33, rev. 2, position C.4 regarding frequency of audits</p> <p>C.4.a.b.c – STP performs these audits in accordance with a nominal biennial frequency.</p>	<p>Same as full.</p> <p>Same as full.</p> <p>Same as full.</p>
ANSI N18.7 – 1976/ANS 3.2	<p>3.4.2 – refer to R.G. 1.8 regarding Operations Manager holding a Senior Reactor Operator license.</p> <p>4.5 – refer to R.G. 1.33 coverage regarding audit frequency.</p> <p>5.2.6 (5th paragraph) – independent verification may be concurrent with (same time as) work performance.</p>	<p>Same as full.</p> <p>3.4.2 refer to R.G. refer to R.G. 1.5.8 regarding use of personnel not qualified in accordance with ANSI N45.2.6.</p> <p>Same as full.</p> <p>Same as full.</p>

TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N18.7/ANS 3.2 (cont'd)	<p>5.2.7 (1st paragraph) – STP will use current approved design bases as opposed to original design bases.</p> <p>5.2.7.1 (5th paragraph) – STP takes exception to use of the word “promptly” with regard to determining, evaluating and recording the causes of malfunctions. The STP Corrective Action Program includes the elements with regard to timeliness of action associated with causal analyses.</p> <p>5.2.15 (4th paragraph) – Chapter 8.0 of the OQAP describes the requirements for control and issuance of documents, which meets the intent of R.G. 1.33, rev. 2. The intent of the biennial review is accomplished by other controls that assure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, regulatory requirements, industry experience and other conditions that may impact plant procedures.</p>	<p>Same as full.</p> <p>5.2.7 – STP will perform inspection as deemed necessary, based on the relative complexity of the work.</p> <p>Same as full.</p> <p>5.2.7.2 – refer to table coverage of ANSI N45.2.11, 1974.</p> <p>5.2.13 (1st paragraph) – refer to table coverage of ANSI N45.2.13, 1976.</p> <p>5.2.13.1 (1st paragraph) – refer to table coverage of ANSI N45.2, 1971.</p> <p>5.2.13.4 (5th paragraph) – refer to table coverage of ANSI N45.2.2, 1972.</p> <p>Same as full.</p>

TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
		5.2.17 (3rd paragraph) – STP may not implement the requirement for conduct of inspections in a manner similar to that associated with construction phase activities (i.e., regarding use of personnel not qualified to ANSI N45.2.6)
R.G. 1.38, rev. 2 (5/77)	No exceptions taken.	No exceptions taken.
ANSI N45.2.2, 1972	2.4 – Audit personnel are qualified in accordance with STP's commitment to R.G. 1.146/ANSI 45.2.23.	Same as full.
		2.4 – Offsite oversight of vendors of items in the Basic category will only be performed as deemed necessary.
	5.2.1 - These activities do not constitute an "inspection" as defined in ANSI/ASME NQA-1, 1983, Supplement S-1, Terms and Definitions. Therefore, the requirements for qualification to ANSI N45.2.6 as stated in Section 2.4 do not apply to personnel performing these activities.	Same as Full
R.G. 1.58, rev. 1 (9/80)	C.2 – STP is committed to ASNT-TC-1A, 1980. STP treats the recommendation (“should”) of the 1980 edition as requirements (“shall”).	Same as full.
ANSI N45.2.6, 1978		1.2 (1st paragraph) – with the exception of receipt inspection, personnel may perform inspections, examinations and tests provided they are experienced, task qualified journeymen, or supervisors, who did not perform or directly supervised the activity being inspected, examined or

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TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.6, 1978	<p>1.2 (3rd paragraph) – refer to table coverage of R.G. 1.28.</p> <p>1.4.4 – refer to table coverage of R.G. 1.74/ANSI N45.2.10.</p> <p>Personnel performing the activities stated in ANSI N45.2.2, Section 5.2.1 do not require qualification to this Standard. (see exception to ANSI N45.2.2)</p>	<p>tested. These individuals shall also receive training to the applicable inspection procedure, processes, methods in accordance with a Quality approved training program; and Quality will provide periodic oversight of the inspection activities.</p> <p>Same as full.</p> <p>Same as full.</p> <p>Same as Full</p>
R.G. 1.64, rev. 2 (6/76)	No exceptions taken.	C.2 – STP may implement the requirement regarding design verification as prescribed in ANSI N45.2.11, 1974, 6.1, second paragraph/second sentence, as opposed to R.G. wording.
ASNI N45.2.11, 1974	No exceptions taken.	<p>3.2 (1<sup>st</sup> paragraph) – STP will require personnel to consider items 1 through 28, but a documented checklist may not be required.</p> <p>6.3 – Verification and checking of design may be accomplished through supervisory or management review/approval as provided for in 6.1 Personnel will be required to consider</p>

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TABLE I  
PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.11, 1974		items 1 through 19, but a documented checklist may not be required.
R.G. 1.74 (2/74)	Not applicable to STP. STP uses ANSI/ASME NQA-1-1983 for Quality Assurance Terms and Definitions.	Same as full.
ANSI N45.2.10, 1973	Same as R.G. 1.74 above.	Same as full.
R.G. 1.88, rev. 2 (10/76)	No exceptions taken.	Same as full.
ANSI N45.2.9, 1974	Section 5.6 – supplement the provisions of this section by providing for alternate temporary storage of records. Allow the use of 1-hour fire rated cabinets to store records that are awaiting processing (e.g., processing into Optical Disk Storage). Storage of these records in 1-hour fire rated cabinets will be controlled by procedure which specify a maximum allowable time limit. Cabinets housing these records shall be controlled for access and shall be located in an area protected by sprinklers.	Same as full.
R.G. 1.123, rev. 1 (7/77)	C.6.b.and e. – The referenced section of ANSI N45.2.13 will be implemented as written.	
ANSI N45.2.13, 1976	<p>Various sections refer to ANSI N45.2. Refer to table coverage of R.G. 1.28 and ANSI N45.2.</p> <p>5.3 and 5.4 – Provision are established for, in special cases and with management approval, completion of these activities after award of contract.</p> <p>9.0 – This section will be implemented based on the scope, complexity and safety significance of the items being procured.</p>	<p>Same as full.</p> <p>Same as full.</p> <p>Same as full.</p> <p>10.3.1 – This section will only be implemented as deemed necessary.</p>

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R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.13, 1976		12 – This section will only be implemented as deemed necessary for audits of suppliers.
R.G. 1.144, rev. 1 (9/80)	C.1 – refer to table coverage of R.G. 1.28 and ANSI N45.2.	Same as full.
	C.3a(1) – refer to table coverage of R.G. 1.33 regarding audit frequency.	Same as full.
		c.3.b STP will audit vendors only as deemed necessary. STP will perform biennial evaluations.
ANSI N45.2.12, 1977	No exceptions taken.	STP will audit vendors only as deemed necessary. These audits will be conducted as unplanned/unscheduled audits.
R.G. 1.146, rev. 0 (8/80)	C.1 – refer to table coverage of R.G. 1.28 and ANSI N45.2. Refer to table coverage of R.G. 1.74 and ANSI N45.2.10	Same as full.
ANSI N45.2.23, 1978	1.2 – refer to table coverage of R.G. 1.28.  1.4 – refer to table coverage of R.G. 1.74.  2.21 – refer to table coverage of R.G. 1.28.  2.3.3.1 – refer to table coverage of R.G. 1.28.	Same as full.  Same as full.  Same as full.  Same as full.

For Regulatory Guides addressed by the table, and unless specific clarification or exception is indicated, STP will implement the Regulatory Guide positions, including recommendations.

## TABLE I

### PROGRAM COMMITMENTS

For ANSI Standards addressed by this table, and unless specific clarification or exception is indicated, STP will treat ANSI requirements (i.e., “shall”) as such – except in instances where the standard itself provides options or requires a graded approach – this notwithstanding the general applicability statements found in many standards (i.e., section 1.0)

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## 1.0 PURPOSE

- 1.1 The purpose of this chapter is to establish the requirements for procurement of items and services for the South Texas Project Electric Generating Station (STP).

## 2.0 SCOPE

- 2.1 This chapter applies to the procurement of items and services for use at STP which are subject to the controls of this Quality program. These activities include procurement document control, bid evaluation, vendor evaluation, verification of vendor activities and receiving inspection.

## 3.0 DEFINITIONS

- 3.1 None

## 4.0 REFERENCES

- 4.1 10CFR50, Appendix B
- 4.2 10CFR21, Reporting of Defects and Noncompliance
- 4.3 OQAP Chapter 2.0, Table I
- 4.4 EPRI NP-5652 (NCIG-07), Guideline for the Utilization of Commercial Grade Items in Nuclear Safety Related Application
- 4.5 OQAP Chapter 4.0, Qualification, Training and Certification of Personnel
- 4.6 OQAP Chapter 13.0, Control of Conditions Adverse to Quality
- 4.7 OQAP Chapter 14.0, Records Control
- 4.8 Generic Letter 89-02, Actions to Improve the Detection of Counterfeit and Fraudulent Marketed Products

## 5.0 REQUIREMENTS

- 5.1 Procurement Document Preparation, Review and Control

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5.1.1 Responsibility for procurement is a joint effort of all the departments within the STP Nuclear Operating Company (STPNOC). The department requesting the material or service provides technical content and quality requirements. Design Engineering/Nuclear Purchasing & Material Management is responsible to provide input to the requesting department on technical content and quality requirements, as requested. Quality will concur with all changes to quality requirements.

5.1.2 The sequence of preparation, review, approval, and issuance of procurement documents is generally as follows:

5.1.2.1 Purchase Requisitions

- Purchase requisition forms shall be used to initiate the procurement of materials, parts, components, and services. Procurement may be initiated by any STPNOC personnel.
- Purchase requisitions shall include material and component identification requirements, drawings, specifications, standards, inspection and test requirements, and special process instructions as appropriate.
- Purchase requisitions for materials, parts, components, or services shall be reviewed by the cognizant technical organization to verify that adequate technical and quality requirements have been specified.
- The reviews for technical and quality requirements shall be performed by someone other than the originator of the requisition. Quality will concur with all changes to quality requirements.

5.1.2.2 Purchase Orders and Contracts

- Purchase orders and contracts are prepared and issued by Nuclear Purchasing and Material Management and establish for the suppliers the technical and quality requirements which must be met.

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- Purchase orders and contracts shall accurately reflect the technical and quality requirements established by the purchase requisition. If, during the bid negotiations with the supplier, it becomes necessary or commercially desirable to change the technical or quality requirements, such changes shall be presented for approval to the cognizant technical organization which approved the original requirements.

5.1.2.3 Change Controls

- Changes to procurement document quality and technical requirements shall require a review and approval equivalent to that of the original document. Commercial consideration changes not affecting the technical or quality requirements do not require review and concurrence by the originator.

5.1.3 For the procurement of spare or replacement parts, equipment, materials, and services, the quality and technical requirements shall be equal to or greater than the design basis requirements for the original part, equipment, materials or services; except where less stringent quality or technical requirements may be established based on specific evaluations and justification. The cognizant technical organization shall document such justification.

5.1.3.1 Items may be procured as Commercial Grade Items (CGIs) if a documented engineering evaluation indicates the CGI will provide equivalent performance. CGI dedication will comply with established procedures designed to satisfy the requirements of References 4.2 and 4.8.

5.1.3.2 The cognizant technical organization shall verify that quality requirements are correctly stated, verifiable, and controllable; that acceptance/rejection criteria are included; and that the documents have been prepared, reviewed, and approved in accordance with STP Quality Program requirements.

5.2 Procurement Document Content

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- 5.2.1 Procurement document control measures shall assure that appropriate regulatory requirements, design bases, and other requirements are included in the procurement process. The following shall be included or invoked by reference in procurement documents as appropriate:
- 5.2.1.1 Applicable regulatory, code, and design requirements, including material and component identification requirements, drawings, specifications, standards, inspection and test requirements, special process instructions and handling, preservation, cleaning, storage, packaging and shipping requirements. These requirements shall equal or exceed the original requirements (unless changed by established design control processes).
  - 5.2.1.2 Extent that supplier QA program shall comply with 10CFR50, Appendix B or the QA program requirements of other nationally recognized codes and standards, as applicable; or for CGIs to be dedicated for safety related use by STPNOC based on the results of a survey of the vendor's controls, the vendor's STPNOC approved and/or surveyed program.
  - 5.2.1.3 Requirements for supplier documents, such as instructions, procedures, drawings, specifications, inspection and test records, and suppliers' QA records to be prepared, submitted, or be made available for review and/or approval by STP personnel.
  - 5.2.1.4 Requirements for suppliers to maintain the status of required inspections or tests throughout the manufacturing process to preclude inadvertent bypassing of inspections and tests.
  - 5.2.1.5 Requirements for STPNOC's right of access to suppliers' facilities and work documents for inspection and audit.
  - 5.2.1.6 Requirements for extending applicable STP procurement requirements to lower-tier suppliers and subcontractors, including STPNOC's access to facilities and records.
  - 5.2.1.7 Requirements for supplier reporting to STP nonconformances to procurement document requirements and conditions for their disposition.

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- 5.2.1.8 Requirements for the retention, control, and maintenance of supplier QA records that are not maintained by STPNOC. Supplier-furnished records shall include:
- Documentation (e.g., certification) that identifies the purchased item and the specific procurement requirements (e.g., codes, standards, and specifications) met by the item.
  - Documentation identifying any procurement requirements that have not been met.
  - A description of those nonconformances from procurement requirements dispositioned "accept-as-is" or "repair".
- 5.2.1.9 Requirement for the supplier to submit a copy of its QA program description (does not apply for CGIs).
- 5.2.1.10 Requirements for the performance of maintenance and receipt inspection checks where applicable.
- 5.2.1.11 Applicability of 10CFR21 reporting requirements.
- The reporting requirements of 10CFR21 do not apply to vendors of CGIs to be dedicated for use by STPNOC.

5.3 Bid Evaluation

- 5.3.1 Bid Evaluations shall be performed to evaluate adherence to technical and quality assurance requirements.

5.4 Supplier Selection

- 5.4.1 Suppliers of items (for CGIs, when basis for dedication includes commercial grade survey) or services shall be required to submit copies of their QA program description for evaluation prior to the issuance of a purchase order or execution of a contract, and acceptability shall be documented. The process by which suppliers are judged as being a capable procurement source is described as follows:

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- 5.4.1.1 Procurement source evaluation and selection involves Engineering & Technical Services, NPMM, and STP plant personnel, as appropriate. These organizations participate in the qualification evaluation of suppliers in accordance with written procedures.
- 5.4.1.2 Measures for the evaluation and selection of procurement sources shall be specified in procedures and may vary depending upon the complexity and risk significance of the item or service. When procurement source evaluations are performed, the information to be considered shall include one or more of the following:
- Experience of users of identical or similar products of the prospective supplier, other utility or approved contractor audits/evaluations, audits/evaluations by cooperative utility groups, American Society of Mechanical Engineers (ASME) Certificates of Authorization, STP records accumulated in previous procurement actions, and STP product operating experience may be used in this evaluation. When other utility, contractor or cooperative utility audits/evaluations are used, the documentation will be obtained and reviewed. Supplier history shall reflect recent capability. Previous favorable experience with suppliers may be an adequate basis for judgments attesting to suppliers' capability.
  - An evaluation of the suppliers' current quality records supported by documented qualitative and quantitative information which can be objectively evaluated. This may include review and evaluation of the suppliers' QA Program Manual, procedures, and responses to questionnaires, as appropriate.
  - A source evaluation of the suppliers' technical and quality capability as determined by a direct evaluation of facilities and personnel (audit, survey, or surveillance) and quality program implementation. Resolution or a commitment to resolve unacceptable technical or quality requirements identified by the bid evaluation or vendor evaluation shall be obtained prior to the award of a purchase order or contract.

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- 5.4.1.3 Procurement source evaluations involve a review of technical and quality considerations to an extent considered appropriate by each participant. Technical considerations include the design or manufacturing capability and technical ability of suppliers to produce or provide the design, service, item or component. Quality considerations include one of the previously stated methods of supplier evaluation and a consideration of a suppliers' current quality program or capabilities.
- 5.4.1.4 A documented quality assurance evaluation of a vendor's quality program shall be performed to assure it meets the appropriate requirements of 10CFR50 Appendix B, or where applicable, other nationally recognized codes and standards, or, for CGIs, to assure the program provides adequate control over established critical characteristics.
- 5.4.1.5 Vendors may be placed on the Approved Vendors List after passing this evaluation.
- 5.4.1.6 A vendor shall not be issued a purchase order or contract unless they have been accepted for placement on the Approved Vendors List or an exception has been approved by the senior management of the Quality & Licensing function.
- 5.4.1.7 Service organizations which will supply only manpower and no other service are not required to be on the Approved Vendors List or have an STP approved quality assurance program as long as the supplied personnel are trained and work under the auspices of the STP Operations Quality Assurance Plan.
- 5.4.2 Each vendor on the Approved Vendors List shall be periodically evaluated by Quality as provided by Reference 4.3 (i.e., annually for "Full" program, biennially for "Basic" program).
- 5.4.2.1 A vendor may be removed from the Approved Vendors List if evaluation determines the vendor is unacceptable, the vendor requests removal or by direction of the senior management of the Quality & Licensing function.

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5.4.3 Planning of verification activities to be employed for item or service acceptance shall begin during the purchase requisition or contract preparation and review stage. The extent of the verification activities will vary and be a function of the relative safety significance, complexity of the purchased item or service, and the supplier's past performance. The verification activities may include vendor surveillance, receipt inspection, or post-installation testing. Verification activities are planned to assure conformance to procurement document requirements. Procedures shall establish the organizational responsibilities for identifying required verifications and methods, performing and documenting the verification activities.

5.4.3.1 Verification activities shall be performed using plans developed in accordance with procedures with appropriate input from the cognizant technical organization. The plan shall specify the characteristics or processes to be witnessed, inspected or verified.

5.4.3.2 Specified source inspections may be waived by the senior management of the Quality & Licensing function.

5.4.3.3 Vendor related reports shall be evaluated to determine the effectiveness of the vendor's quality assurance program.

5.5 Receiving Activities

5.5.1 Received purchased items shall be observed for shipping damage and the requirements of ANSI N45.2.2 Section 5.2.1. (This activity does not constitute an inspection and does not require qualification in accordance with Reference 4.5)

5.5.2 Receiving inspection shall be coordinated with verification activities. If source inspection is not performed or did not address all applicable attributes, receipt inspection shall be performed and shall include the applicable additional attributes listed in ANSI N45.2.2 Section 5.2.2, except for commercial grade items dedicated by survey which shall be receipt inspected as required by the procurement document.

5.5.3 Receiving inspection checklists shall be developed using the requirements specified in the procurement documents and applicable attributes of ANSI N45.2.2.

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- 5.5.4 Statistical sampling methods may be used for groups of similar items. Sampling shall comply with nationally recognized methods or approved engineering alternates.
- 5.5.5 Receiving inspections shall be performed by personnel trained and qualified in accordance with Reference 4.5. Technical assistance shall be provided by Generation or Engineering & Technical Services as applicable.
- 5.5.6 Receiving inspection activities shall include:
  - 5.5.6.1 Identifying materials, parts, and components and their status upon receipt by tagging or other acceptable means of identification, or segregating and controlling items in receiving hold areas separate from the storage facilities for acceptable items. Identification of items shall correspond to the identification required by procurement documents and be noted on receiving documentation.
  - 5.5.6.2 Verification of items for acceptance includes correctness of identification and specified quality documentation.
  - 5.5.6.3 Inspecting or testing using approved procedures and calibrated tools, gauges, and measuring equipment for verification acceptance of items, including off-the-shelf items.
  - 5.5.6.4 Items determined to be acceptable for use shall be identified with an "accept" tag or other acceptable means of identification prior to release for storage or use.
  - 5.5.6.5 Received items which do not conform to procurement documents are controlled and segregated (if practical) and processed in accordance with Reference 4.6.

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5.5.7 Acceptance by post-installation test may be utilized following one of the preceding verification methods. Post-installation testing may be used for acceptance verification when it is difficult to verify item quality characteristics, the item requires an integrated system checkout or test, or the item cannot demonstrate its ability to perform when not in use. Engineering specifications shall be used for developing post-installation test instruction requirements and acceptance documentation. Post-installation testing is the responsibility of the Plant Manager and is witnessed by Engineering & Technical Services personnel at specified hold points.

5.5.8 Acceptance of Procured Items and Services

5.5.8.1 Acceptance of items and services shall be based on one or more of the following:

Written certifications

(Note: This shall not be the sole method of acceptance for items in the "Basic" program)

Surveillance/Audit of procured service

Source verification

Receiving inspection/testing

Commercial Grade Item  
dedication

Vendor surveillance

Post-installation test

5.5.9 Documented evidence from the supplier that procured items meet procurement quality requirements, when required, such as codes, standards, or specifications will be maintained at the plant site. Such evidence shall be provided by the supplier, at the time of source or receipt inspection, for review and verification before acceptance. The documented evidence will be retrievable and available at the plant site prior to installation or use of the procured item, unless otherwise controlled in accordance with Reference 4.6.

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5.6 Vendor Surveys, Surveillance and Audit

5.6.1 For items in the Full Program, Suppliers Certificates of Conformance, shall be periodically evaluated by audits, independent inspections, surveys, or tests to assure that they are valid and results are documented. When acceptance is based upon source inspection, documented evidence shall be furnished to the plant receiving organization.

5.6.1.1 Acceptance by source inspection may be considered when the item or service is vital to plant safety; or the quality characteristics are difficult to verify after receipt; or the item or service is complex in design, manufacture, inspection, or test. Vendor surveillance/source inspection involves a physical presence to monitor, by observation, designated activities for the purpose of evaluating supplier performance and product acceptance (source inspection only).

5.6.2 The STP survey and audit program provide for periodic scheduled audits or surveys of suppliers, the site procurement program, contractors, subcontractors, and others performing work. The audit and survey schedule is prepared and updated by Quality. Frequency of these surveys and audits is based upon the safety, complexity, and quality requirements, and as a minimum shall be in compliance with Reference 4.3.

6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.7.

7.0 ATTACHMENTS

7.1 None

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