Nuclear Operating Company

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

May 8, 2003
NOC-AE-03001525
File No.: G25
10CFR50.54(a)

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Submittal of Operations Quality Assurance Plan Change QA-054

In accordance with 10CFR50.54, South Texas Project Nuclear Operating Company submits the attached change, QA-054, to revision 15 of the Operations Quality Assurance Plan (OQAP). The change is an incorporation of the applicable portions of the Technical Specification, Chapter 6.0, Administrative Controls that were approved for relocation by License Amendment 151/139 dated April 24, 2003. For the most part, this change incorporates the words directly from the Technical Specifications into the OQAP, except for instances where the words were clarified to be current with the new language in 10CFR50.59. It is expected that there will be subsequent OQAP changes to eliminate duplicate requirements as a result of this relocation.

This change does not reduce any element of or responsibilities for implementation of the QA program. 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).

If there are any questions regarding this matter, please contact Mr. M. A. McBurnett at (361) 972-7206 or me at (361) 972-8757.

J. J. Sheppard
President and Chief
Executive Officer

kaw
Attachment: Change QA-054

Q004

cc:
(paper copy)

Ellis W. Merschoff
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

Cornelius F. O'Keefe
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

(electronic copy)

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius LLP

L. D. Blaylock
City Public Service

Mohan C. Thadani
U. S. Nuclear Regulatory Commission

R. L. Balcom
Texas Genco, LP

A. Ramirez
City of Austin

C. A. Johnson
AEP Texas Central Company

Jon C. Wood
Matthews & Branscomb

CHANGE QA-054
SUMMARY OF CHANGES

ALL CHANGE ARE IN BOLD TYPE

CHAPTER	LOCATION	ACTION	TEXT
TOC	CH 19.0	INSERT	**QA-054**
CH 19.0	ALL	INSERT	This entire chapter is added as a result of Technical Specification Amendments 151/139 (04/24/2003)

Chapter Number	Title Chapter	Effective Revision	Effective Date	Change Notice No.
	Definitions	9	2-1-02	
1.0	Organization	11	2-1-02	QA-053
2.0	Program Description	13	2-1-02	
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	8	2-1-02	
7.0	Procurement	9	2-1-02	
8.0	Control and Issuance of Documents	6	2-1-98	
9.0	Control of Material	6	2-1-98	
10.0	Inspection	9	2-1-02	
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	10	2-1-02	
14.0	Records Control	7	2-1-02	
15.0	Quality Oversight Activities	8	2-1-00	

Chapter Number	Title Chapter	Effective Revision	Effective Date	Change Notice No.
16.0	Independent Technical Review	7	2-01-00	
17.0	ASME Code Section XI - Repairs and Replacements	6	2-01-00	
18.0	ASME Code Section XI - Inservice Inspection and Testing	7	2-01-00	
19.0	Administrative Controls	0	5-15-03	QA-054

1.0 PURPOSE

1.1 The purpose of this chapter is to describe the administrative controls (as previously documented in the Technical Specifications) as related to quality assurance for the South Texas Project Electric Generating Station (STPEGS).

2.0 SCOPE

2.1 STP Nuclear Operating Company (STPNOC), as licensee, has the Quality responsibility for administrative controls of the STP.

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 OQAP Chapter 2.0, Table I

4.2 STP Technical Specifications

4.3 Updated Final Safety Analysis Report

4.4 OQAP Chapter 8, Control and Issuance of Documents

4.5 OQAP Chapter 14, Records Control

4.6 OQAP Chapter 15, Quality Oversight Activities

5.0 REQUIREMENTS

5.1 The Plant Operations Review Committee (PORC) shall function to advise the Plant Manager on all matters related to nuclear safety.

5.1.1 The PORC shall be composed of six members, who shall be appointed in writing by the Plant Manager from senior experienced onsite individuals, at the manager level or equivalent, representing each of the following disciplines: engineering, operations, chemistry, health physics, quality assurance/quality control and maintenance. The quality assurance/quality control representatives shall not be appointed as PORC Chairman.

5.1.2 The PORC Chairman shall be appointed in writing from among those members by the Plant Manager. One of the members shall meet the requirements of Regulatory Guide 1.8 (Personnel Selection and Training – Revision 1-R), Radiation Protection Manager.

5.1.3 All alternate members shall be appointed in writing by the Plant Manager to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions shall consist of the Chairman or his designated alternate and three other members including alternates.

5.1.6 The PORC shall be responsible for:

5.1.6.1 Review of all safety-related station administrative procedures and changes thereto.

5.1.6.2 Review of safety evaluations for (1) procedures, (2) changes to procedures, structures, components, or systems, and (3) tests or experiments completed under the provisions of 10CFR50.59 to verify that such actions did not require prior Nuclear Regulatory Commission (NRC) approval.

5.1.6.3 Review of proposed (1) procedures, (2) changes to procedures, structures, components, or systems, and (3) tests or experiments completed under the provisions of 10CFR50.59 which may require prior NRC approval.

5.1.6.4 Review of all required programs by Technical Specification 6.8 and changes thereto.

5.1.6.5 Review of proposed changes to the Technical Specifications or the Operating License.

5.1.6.6 Review of all REPORTABLE EVENTS.

5.1.6.7 Review of reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment or systems that affect nuclear safety.

5.1.6.8 Review of reports of unanticipated deficiencies in the design or operation of structures, systems, or components that affect nuclear safety.

5.1.6.9 Review of the Security Plan and implementing procedures and changes thereto.

5.1.6.10 Review of the Emergency Plan and implementing procedures and changes thereto.

5.1.6.11 Review of the PROCESS CONTROL PROGRAM and implementing procedures and changes thereto.

5.1.6.12 Review of the OFFSITE DOSE CALCULATION MANUAL and implementing procedures and changes thereto.

5.1.6.13 Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Nuclear Safety Review Board (NSRB).

5.1.6.14 Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Plant Manager and to the NSRB.

5.1.6.15 Reports of violations of codes, regulations, orders, Technical Specifications, or Operating License requirements having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.

5.1.6.16 Review of the Fire Protection Program, quality-related implementing procedures and changes thereto.

5.1.7 The PORC shall recommend in writing to the Plant Manager approval or disapproval of items considered under section 5.1.6.1 through 5.1.6.5 prior to their implementation, and items considered under sections 5.1.6.9 through 5.1.6.12.

5.1.8 The PORC shall render determinations in writing with regard to whether or not each item considered under sections 5.1.6.1 through 5.1.6.5 and 5.1.6.15 may require prior NRC approval under the provisions of 10CFR50.59.

5.1.9 The PORC shall provide written notification within 24 hours to the President and Chief Executive Officer and the Nuclear Safety Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have the responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

5.1.10 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of this chapter. Copies shall be provided to the President and Chief Executive Officer and the Nuclear Safety Review Board.

5.2 The Nuclear Safety Review Board (NSRB)

5.2.1 The NSRB shall function to provide independent review and audit of designated activities in the areas of:

5.2.1.1 Nuclear power plant operations;

5.2.1.2 Nuclear engineering;

5.2.1.3 Chemistry and radiochemistry;

5.2.1.4 Metallurgy;

5.2.1.5 Instrumentation and control;

5.2.1.6 Radiological safety;

5.2.1.7 Mechanical and electrical engineering;

5.2.1.8 Civil engineering;

5.2.1.9 Training;

5.2.1.10 Nuclear assurance;

5.2.1.11 Nuclear licensing;

5.2.1.12 Plant security, and;

5.2.1.13 Environmental impact.

5.2.2 The NSRB shall report to and advise the President and Chief Executive Officer on those areas of responsibility specified in sections 5.2.8 and 5.2.9.

5.2.3 The NSRB shall be composed of at least five members appointed in writing by the President and Chief Executive Officer selected from senior managers reporting to at least the vice president level in the STPEGS Management Organization. Additional members shall be appointed in writing by the President and Chief Executive Officer so the NSRB collectively has the capability to review technical matters listed in section 5.2.1. The NSRB Chairman shall be appointed in writing from among these members by the President and Chief Executive Officer.

5.2.4 All alternate members shall be appointed in writing by the President and Chief Executive Officer to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NSRB activities at any one time.

5.2.5 Consultants shall be utilized as determined by the NSRB Chairman to provide expert advice to the NSRB.

5.2.6 The NSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

5.2.7 The quorum of the NSRB necessary for the performance of the NSRB review and audit functions of this chapter shall consist of the Chairman or his designated alternate and at least a majority of NSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

5.2.8 The NSRB shall be responsible for the review of:

5.2.8.1 The safety evaluations for: (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10CFR50.59, to verify that such actions did not require prior NRC approval;

5.2.8.2 Proposed changes to procedures, equipment, or systems which require prior NRC approval under the provisions of 10CFR50.59;

5.2.8.3 Proposed tests or experiments which require prior NRC approval under the provisions of 10CFR50.59;

5.2.8.4 Proposed changes to Technical Specifications or the Operating License;

5.2.8.5 Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;

5.2.8.6 Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;

5.2.8.7 All REPORTABLE EVENTS;

5.2.8.8 All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and

5.2.8.9 Reports and meeting minutes of the PORC.

5.2.9 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

5.2.9.1 The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions;

5.2.9.2 The training and qualification of the unit staff;

5.2.9.3 Actions taken to correct deficiencies occurring in equipment, structures, systems, components, or method of operation that affect nuclear safety;

5.2.9.4 The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10CFR50;

5.2.9.5 The fire protection programmatic controls including the implementing procedures;

5.2.9.6 The fire protection equipment and program implementation utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant;

5.2.9.7 The Radiological Environmental Monitoring Program and the results thereof;

5.2.9.8 The OFFSITE DOSE CALCULATION MANUAL and implementing procedures;

5.2.9.9 The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes;

5.2.9.10 The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring; and

5.2.9.11 Other activities and documents as requested by the NSRB or the President and Chief Executive Officer.

5.2.10 Records of NSRB activities shall be prepared, approved, and distributed as indicated below:

5.2.10.1 Minutes of each NSRB meeting shall be prepared, approved, and forwarded to the President and Chief Executive Officer within 14 days following each meeting.

5.2.10.2 Reports of reviews encompassed by section 5.2.8 shall be prepared, approved, and forwarded to the President and Chief Executive Officer within 14 days following completion of the review.

5.2.10.3 Audit reports encompassed by section 5.2.9 shall be forwarded to the President and Chief Executive Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

5.3 Technical Review and Control

5.3.1 Activities that affect nuclear safety shall be conducted as follows:

5.3.1.1 Procedures required by Technical Specification 6.8, and other procedures that affect nuclear safety, and changes thereto, shall be prepared, reviewed, and approved. Each such procedure, or change thereto, shall be reviewed by an individual/group other than the individual/group who prepared the procedure, or change thereto, but who may be from the same organization as the individual/group who prepared the procedure, or change thereto. Procedures other than station administrative procedures shall be approved by the Plant Manager, Plant Superintendent, or the head of the responsible department prior to implementation. The Plant Manager shall approve station administrative procedures, security plan implementing procedures, and emergency plan implementing procedures. Temporary changes to procedures, which clearly do not change the intent of the approved procedures, shall be approved prior to implementation by two members of the plant staff, at least one of whom holds a Senior Reactor Operator's License. Changes to procedures that may involve a change to the intent of the original procedure shall be approved by the individual authorized to approve the procedure prior to implementation of the change.

5.3.1.2 Proposed changes or modifications to safety-related structures, systems, and components shall be reviewed as designated by the Plant Manager. Each such modification shall be reviewed by an individual/group other than the individual/group who designed the modification, but who may be from the same organization as the individual/group who designed the modification. Proposed modifications to safety-related structures, systems, and components shall be approved by the Plant Manager prior to implementation.

5.3.1.3 Proposed tests and experiments that affect nuclear safety and that are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved prior to implementation. Each such test or experiment shall be reviewed by an individual/group other than the individual/group who prepared the test or experiment but who may be from the same organization as the individual/group who prepared the test or experiment. Proposed tests and experiments shall be approved by the Plant Manager.

5.3.1.4 Individuals responsible for reviews performed in accordance with sections 5.3.1.1, 5.3.1.2, and 5.3.1.3 shall be members of the plant management staff previously designated by the Plant Manager. Each review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.

5.3.1.5 Each review will include a determination of whether or not prior NRC approval is involved pursuant to 10CFR50.59. NRC approval of items will be obtained prior to Plant Manager approval for implementation.

5.3.2 Records of the above activities shall be provided to the Plant Manager, PORC, and/or NSRB as necessary for required reviews.

5.4 Record Retention

5.4.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

5.4.2 The following records shall be retained for at least 5 years:

5.4.2.1 Records and logs of unit operation covering time interval at each power level;

5.4.2.2 Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;

5.4.2.3 All REPORTABLE EVENTS;

5.4.2.4 Records of surveillance activities, inspections, and calibrations required by the Technical Specifications;

5.4.2.5 Records of changes made to the procedures required by Technical Specification 6.8;

5.4.2.6 Records of sealed source and fission detector leak tests and results; and

5.4.2.7 Records of annual physical inventory of all sealed source material of record.

5.4.3 The following records shall be retained for the duration of the unit Operating License:

5.4.3.1 Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;

5.4.3.2 Records of new and irradiated fuel inventory, fuel transfers, and assembly burn-up histories;

5.4.3.3 Records of doses received by all individuals for whom monitoring was required;

5.4.3.4 Records of gaseous and liquid radioactive material released to the environs;

5.4.3.5 Records of transient or operational cycles for those unit components identified in the Updated Final Safety Analysis Report;

5.4.3.6 Records of reactor tests and experiments;

5.4.3.7 Records of training and qualification for current members of the unit staff;

5.4.3.8 Records of in-service inspections performed pursuant to the Technical Specifications;

5.4.3.9 Records of quality assurance activities required by the Operations Quality Assurance Plan;

5.4.3.10 Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10CFR50.59;

5.4.3.11 Records of meetings of the PORC and the NSRB

5.4.3.12 Not used

5.4.3.13 Records of secondary water sampling and water quality;

5.4.3.14 Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed;

5.4.3.15 Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM; and

5.4.3.16 Records of radioactive shipments.

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 the requirements of this chapter and Reference 4.4.

7.0 ATTACHMENTS

7.1 None