

PMSTPCOL PEmails

From: George Wunder
Sent: Tuesday, April 15, 2008 5:31 PM
To: Stillwell, Daniel
Cc: STPCOL
Subject: RE: Phone call on Chapter 17.5

Bill,

Here are the questions for tomorrow's call.

17.5-***

Section A, "Organization," of Standard Review Plan (SRP) Section 17.5 indicates that the applicant's Quality Assurance Program Description (QAPD) should contain an organizational description that addresses the organizational structure, functional responsibilities, levels of authority, and interfaces. The organizational description is to include the onsite and offsite organizational elements that function under the cognizance of the Quality Assurance (QA) program. The Nuclear Energy Institute (NEI) template provides flowcharts (Figures II.1-1 and II.1-2) to delineate the organizational interfaces. Please provide a clear illustration of the interrelationships between STP corporate and the QA organization.

17.5-***

Subpart C of 10 CFR Part 52 identifies the general provisions for combined licenses. More specifically, 10 CFR Part 52.79 identifies the technical information required to be contained in the final safety analysis report. Section 2.5 of STP's QAPD states that, "10 CFR 50.34(b)(6)(ii) and 10 CFR Part 52.59(a)(25) requires that the Final Safety Analysis Report(FSAR) include, among other things, the managerial and administrative controls to be used to assure safe operation, including a discussion of how the applicable requirements of Appendix B will be satisfied." In this statement, STP references 10 CFR 52.59, instead of 10 CFR 52.79. The application also references 10 CFR 50.34, which no longer will be required. Please justify or amend these departures.

17.5-***

Appendix B to 10 CFR Part 50 requires the applicant to establish a quality assurance program that provides for the indoctrination and training of personnel performing activities affecting quality. In Section 2.8 of its QAPD, STP commits to compliance with American Society of Mechanical Engineers (ASME) NQA-1-1994 Basic Requirement 2 and Supplements 2S-1, 2S-2, 2S-3, and 2S-4, with certain exceptions to Supplements 2S-2 and 2S-3, in establishing qualification and training programs. The NEI template identifies exceptions to Supplements 2S-1, 2S-2, and 2S-3. However, STP did not include the exception to Supplement 2S-1 for the qualifications of personnel performing independent quality verification activities, inspection planning, and the evaluation of the capabilities of inspectors or the training program for inspectors. Please verify that STP will not be implementing this exception.

17.5-***

Section U, "Regulatory Commitments," of SRP Section 17.5 indicates that the applicant should commit to the most recent revision of certain Regulatory Guides (RGs) and Generic Letters (GLs). Regulatory Guide 1.37, "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants," is included on this list and is referenced in Section 13.2 of STP's QAPD. However, Part IV, "Regulatory Commitments," of the STP QAPD does not identify RG 1.37 as a commitment. Please justify this exception.

17.5-***

SRP Section 17.5(V), “Nonsafety-Related SSC Quality Controls,” indicates that inspections of nonsafety-related SSCs should be performed where necessary to verify conformance of an item or activity to specified requirements or to verify that activities are satisfactorily accomplished. STP QAPD Part III Section 1.10, “Inspection,” states that “These inspections may be performed by personnel in the line organization through the process that utilizes knowledgeable personnel to perform the verification function.” Please identify and provide an explanation of the process that utilizes knowledgeable personnel to perform the verification function within STP’s organization.

17.5-***

The SRP, which indicates that the applicant’s organizational description should address functional responsibilities, identifies these responsibilities to include activities such as preparing, reviewing, approving, and verifying designs; qualifying suppliers; preparing, reviewing, approving, and issuing instructions, procedures, schedules, and procurement documents; purchasing; verifying supplier activities; identifying and controlling acceptable and nonconforming hardware and software; manufacturing; calibrating and controlling measuring and test equipment; qualifying and controlling special processes; constructing; inspecting; testing; startup; operating; performing maintenance; performing the audit function; and controlling records. The NEI template identifies the overall organization as well as the individual positions that are responsible for performing and verifying these specific activities. (1) Please address in more detail the functional responsibilities. For example, for the Plant General Manager responsible for the operations and maintenance of the plant, the description does not specify the functions related to operations (e.g., startup, testing, surveillance, engineering), and how these functions will be performed. (2) Please refer to the specific organizational titles throughout the QAPD.

17.5-***

STP QAPD Section 13.2, “NQA-1-1994 Commitment/Exception,” includes the reference to RG 1.37 in the text of a sub-bullet labeled “Subpart 3.2, Appendix 2.1.” This sub-bullet is placed under the bullet “NQA-1-1994, Subpart 2.2.” The applicant should add a bullet labeled “NQA-1-1994, Subpart 3.2” above this sub-bullet for proper organization of the exceptions.

George

From: Stillwell, Daniel [mailto:dwstillwell@STPEGS.COM]
Sent: Tuesday, April 15, 2008 5:20 PM
To: George Wunder
Subject: RE: Phone call on Chapter 17.5

George,

Greg asked if it possible to see the questions before the phone call to ensure that I invited the right people.

Thanks,

Bill Stillwell
(361) 972-7581
[cell] (979) 240-6867

From: George Wunder [mailto:George.Wunder@nrc.gov]
Sent: Tuesday, April 15, 2008 2:32 PM
To: Stillwell, Daniel
Subject: RE: Phone call on Chapter 17.5

Bill,

Sounds good. Talk to you tomorrow.

George

From: Stillwell, Daniel [mailto:dwstillwell@STPEGS.COM]

Sent: Tuesday, April 15, 2008 3:25 PM

To: George Wunder

Cc: Agles, James; Mookhoek, William; Gibson, Gregory T

Subject: Phone call on Chapter 17.5

George,

I got your phone call. We can support a call at 9:00 AM EDT to discuss the draft 17.5 questions. Can I suggest we use the STP Licensing bridge line? The number is 866 517-8685.

Thank you.

Bill Stillwell
(361) 972-7581

Hearing Identifier: SouthTexas34Public_EX
Email Number: 41

Mail Envelope Properties (419623E8C7444444BF132DA3AE69EDA20AE65BF748)

Subject: RE: Phone call on Chapter 17.5
Sent Date: 4/15/2008 5:30:36 PM
Received Date: 4/15/2008 5:30:38 PM
From: George Wunder

Created By: George.Wunder@nrc.gov

Recipients:
"STPCOL" <STP.COL@nrc.gov>
Tracking Status: None
"Stillwell, Daniel" <dwstillwell@STPEGS.COM>
Tracking Status: None

Post Office: HQCLSTR02.nrc.gov

Files	Size	Date & Time
MESSAGE	6662	4/15/2008 5:30:38 PM

Options
Priority: Standard
Return Notification: No
Reply Requested: No
Sensitivity: Normal
Expiration Date:
Recipients Received: