

PMSTPCOL PEmails

From: Ballinger, Amy [aballinger@STPEGS.COM]
Sent: Tuesday, October 21, 2008 12:53 PM
To: Adrian Muniz; Belkys Sosa; George Wunder; Loren Plisco; Raj Anand; Rocky Foster; Tekia Govan; Tom Tai
Subject: Request for Additional Information
Attachments: ABR-AE-08000077.pdf

Good Morning,

Attached, please find a courtesy copy of the cover letter with attachments which answers the NRC's Request for Additional Information. The official paper copy was sent overnight according to the letter addressee list.

If you have any questions, please contact Coley Chappell at (361) 972-4745 or Bill Mookhoek at (361) 972-7274.

Have a great day!!!

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South Texas Project Electric Generating Station 4000 Avenue F – Suite A Bay City, Texas 77414

October 21, 2008
ABR-AE-08000077

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
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11555 Rockville Pike
Rockville MD 20852-2738

South Texas Project
Units 3 and 4
Docket Nos. 52-012 and 52-013
Response to Requests for Additional Information

The purpose of this letter is to respond to the NRC staff's Request for Additional Information (RAI) letter number 61 related to South Texas Project Units 3 & 4 Combined License Application (COLA) Part 2, Tier 2 Section 17.5S, and "STP 3 & 4 Quality Assurance Program Description" (QAPD) Part II Section 1. Attached is the response to the RAI Question number 17.5-8. This submittal completes the response to RAI letter number 61.

No COLA revision is required as a result of this RAI response. Changes to the QAPD as described in the attachment will be incorporated into the next routine revision of the QAPD following NRC acceptance of the question response.

There are no commitments in this letter.

If you have any questions regarding the attached response, please contact me at (361) 972-7136, or Bill Mookhoek at (361) 972-7274.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/21/08

Scott Head
Manager, Regulatory Affairs
South Texas Project Units 3 & 4

sab

Attachment: Question 17.5-8

cc: w/o attachment except*
(paper copy)

(electronic copy)

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RAI 17.5-8**QUESTION:**

QAPD Part II, Section 1, Organization, describes the STP organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAPD implementation. The description is applicable to the construction/preoperation phase and also to the operations phase.

The NRC issued RAI 17.5-6 to ask STP to provide a clear illustration of STP functional responsibilities, to include 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. RAI 17.5-6 also asked STP to refer to the specific organizational titles throughout the QAPD. Your response to RAI 17.5-6, as submitted in a letter dated May 22, 2008, did not fully address the staff's concerns.

- a) Every applicant for a combined license is required by the provisions of §52.79 to include in its FSAR a description of the QA program applied to the design, and to be applied to the fabrication, construction, and testing of the structures, systems, and components of the facility and to the managerial and administrative controls to be used to assure safe operations. The QAPD must include a discussion of how the applicable requirements of Appendix B have been and will be satisfied, including a discussion of how the QA program will be implemented.

In accordance with the above, please structure Section 1, Organization, of the QAPD such that it clearly delineates 1) how the QA program is implemented during the period of construction and testing and 2) how the QA program is implemented during the operations phase. The transition process during which the operational programs become effective should be described. Position descriptions should clearly delineate these roles during the construction/preoperation phase, the operations phase, and the transition period between the two phases.

- b) The STP QAPD describes the functions and responsibilities associated with the quality assurance requirements of Appendix B, Criteria I, Organization and Criteria II, Quality Assurance. All positions associated with the establishment, implementation, and verification of quality-related activities should be shown on the organization charts and described in the QAPD. For the operations phase, the level of detail to be included should include roles, responsibilities, and lines of authority for the positions necessary to implement the requirements of Appendix B. Comparable detail should be provided for the construction/preoperation phase.

In accordance with the above, please provide 1) a description of the STP organizational structure and position descriptions for all activities included in the scope of the STP QAPD.

Sufficient detail must be included to fully describe how the STP Organization will perform, manage, and/or oversee activities affecting the quality and performance of safety-related systems, structures, and components (SSCs) related to safety, including: testing, preoperational activities such as ITAAC, receiving, storing, repairing, decommissioning, refueling, and shipping.

In addition, please provide 2) position descriptions, including roles, responsibilities, and lines of authority, for all positions identified in the STPNOC Units 3 and 4 Organization Chart. Section I, Organization, does not include position descriptions for the Operations Manager, Training Manager, or Information Technology Supervisor. Please identify in the Organization Chart (if not already done) positions that are necessary to support managerial roles such as the Plant Manager. In addition, please include in the QAPD a complete description of these positions, including the EPC Design Engineer and the Owner's Engineer, who interface with the Engineering Manager.

- c) Please provide a description of STP's plan for incorporating revisions to NEI 06-14A, "Quality Assurance Program Description." Examples of these revisions, as discussed at a July 1, 2008 public meeting with NEI and the NRC staff, include:
1. the approval of additional calibration laboratories, including ACLASS Accreditation Services (ACLASS), International Accreditation Service (IAS), and Laboratory Accreditation Bureau (L-A-B)
 2. the deletion of NRC Regulatory Information Summary (RIS) 2002-22, which applies to digital upgrades, from the commercial graded dedication discussion
 3. the clarification of requirements for the Organization Section of the QAPD, including the use of specific organizational titles throughout the QAPD.

RESPONSE:

Response to questions a) and b):

STPNOC will replace Part II, Section I of the QAPD with the following Part II, Section I, including functional responsibilities of the organizational positions shown in Figure II.1-1 and Figure II.1-2 and clear delineation of these responsibilities from the construction/preoperation phase through the transition to the operations phase. This response supersedes the response previously provided to RAI 17.5-6. In addition, the organizational charts (Figures II.1-1 and II.1-2) being provided in this response supersede those previously provided in response to RAI 17.5-1.

SECTION 1 ORGANIZATION

This Section describes the STP Nuclear Operating Company (STPNOC) organizational structure, functional responsibilities, levels of authority and interfaces for establishing, executing, and verifying QAPD implementation during the construction/preoperation phase, the operations phase, and the transition between the two phases. The organizational structure includes offsite and onsite functions for STP 3 & 4 including interface responsibilities for multiple organizations performing quality related functions. Implementing documents assign more specific responsibilities and duties, and define the organizational interfaces involved in conducting activities and duties within the scope of this QAPD. Management gives careful consideration to the timing, extent and effects of organizational structure changes.

STPNOC management is responsible to size the Quality Assurance organizations commensurate with the duties and responsibilities assigned.

The STPNOC (Units 3 & 4) construction/preoperation organization is shown on Figure II.1-1. The STPNOC (Units 1 & 2) organization is shown to illustrate the overall STPNOC company structure. Figure II.1-2 illustrates the STPNOC organization after transition to the operations phase.

During all phases, managers of all departments are responsible for the development and implementation of procedures and the training of personnel, as required, to accomplish their roles with respect to quality.

The President and CEO has overall responsibility for the implementation of this QAPD and approving revisions thereto during all phases.

1.1 Construction/Preoperation Phase

The following roles and responsibilities correspond to those positions shown on Figure II.1-1 and are applicable during the construction/preoperation phase.

1.1.1 Group Vice President

The Group Vice President reports to the President and CEO and is responsible for implementing quality program requirements applicable to the overall efforts associated with the activities related to the Combined License.

Upon transition to the operations phase this position is eliminated, and the responsibilities of the Group Vice President will be performed by the Chief Operating Officer/Chief Nuclear Officer (COO/CNO).

1.1.2 Vice President Oversight and Regulatory Affairs

The Vice President, Oversight and Regulatory Affairs reports to the Group Vice President and is responsible for implementing quality program requirements applicable to activities associated with licensing and independent oversight. The Vice President, Oversight and Regulatory Affairs, at his discretion, has unfettered access to the President and CEO and the Board of Directors.

The Vice President, Oversight and Regulatory Affairs has the independence to conduct Quality activities without undue pressure of cost or schedule and has authority for the following:

- Development, maintenance, and independent verification of implementation of the STP QAP; making periodic reports on its effectiveness; review of selected documents which control activities within its scope;
- Review of the QAPD and revisions thereto;
- Identification, recommendation, initiation, and provision of solutions to quality-related problems and verifying the implementation and effectiveness of the solutions;
- Independent oversight activities, including audits, independent assessments, evaluations, surveillances, and performance monitoring;
- A corrective action program; and
- Stopping work pending problem resolution.

Upon transition to the operations phase this position is eliminated, and the duties and responsibilities above will be transferred to the GM, Oversight and Regulatory Affairs.

1.1.3 Manager, Quality

The Manager, Quality reports directly to the Vice President Oversight and Regulatory Affairs, has unfettered access to the President and CEO, and is responsible for ensuring the QAP is appropriately implemented and maintained. The Manager, Quality has the authority and organizational freedom to conduct quality activities without undue pressure of cost or schedule. The Manager, Quality is responsible for the overall implementation of the QAP. Additionally, the Manager, Quality ensures the following items are performed:

- Recommending, initiating, and verifying solutions to quality problems through corrective action;
- Developing and revising this QAPD and selected procedures for conformity with NRC requirements;
- Monitoring activities and verifying the effectiveness of the QAP by means of an audit program, and reporting audit results;
- Providing orientation and training to STPNOC (Units 3 & 4) employees in quality assurance, as required for their job;
- Providing oversight of suppliers' quality assurance program to ensure all appropriate controls are in place;
- Monitoring suppliers for compliance with material and service requirements;
- Reviewing and approving applicable procurement documents and changes thereto;
- Approving and maintaining the list of approved suppliers; and
- Stopping work pending problem resolution.

Upon transition to the operations phase this position is eliminated, and the duties and responsibilities are transferred to the Manager, Quality who reports to the GM, Oversight and Regulatory Affairs as shown on Figure II.1-2.

1.1.4 Manager, Regulatory Affairs

The Manager, Regulatory Affairs reports directly to the Vice President, Oversight and Regulatory Affairs and is responsible for interfacing with the Nuclear Regulatory Commission, siting, and implementation of a:

- Corrective action program;
- Security program; and
- Environmental protection program

Upon transition to the operations phase this position is eliminated, and the duties and responsibilities of the Manager, Regulatory Affairs associated with NRC interface will be transferred to the Manager, Licensing. The responsibilities associated with corrective action, security, and environmental protection programs will be transferred to the GM, Generation Support.

1.1.5 Vice President, Engineering and Construction

The Vice President, Engineering and Construction reports to the Group Vice President and is responsible for activities involved with the engineering, design, and construction of STP 3 & 4 including:

- Establishing appropriate interface controls for implementing the QAP requirements of this manual;
- Ensuring appropriate design requirements are included in procurement documentation;
- Preparing, issuing, and reviewing applicable technical specifications, instructions, procedures, and drawings; and
- Planning start-up.

Upon transition to the operations phase this position is eliminated. Roles and responsibilities of the Vice President, Engineering and Construction associated with engineering activities are transferred to the Vice President Engineering. The responsibilities related to construction are no longer necessary and therefore are eliminated.

1.1.6 Manager, Engineering

The Manager, Engineering reports directly to the Vice President, Engineering and Construction and is responsible for:

- Interfacing with the contractor design engineers and the Owners Engineer (OE);
- Ensuring suppliers develop, control, and distribute fabrication drawings in accordance with applicable codes and regulatory requirements;
- Initiating procurement requests for materials and services;

- Ensuring that inspection and test activities performed by suppliers are technically adequate; and
- Reviewing design documentation.

Upon transition to the operations phase this position is eliminated. The duties and responsibilities of the Manager, Engineering will be transferred to the General Manager of Engineering Units 3 & 4.

1.1.7 Manager, Turnover/Startup

The Manager, Turnover/Startup reports directly to the Vice President, Engineering and Construction and is responsible for interfacing with the Engineering, Procurement, and Construction (EPC) contractor for activities at STP 3 & 4 related to oversight of the day-to-day activities of the Preoperations/Startup Test Group. The Manager, Turnover/Startup is also responsible for ensuring smooth interface between STP 3 & 4 Plant Staff and the testing organization(s). Prior to fuel load, the Manager, Turnover/Startup is responsible for completion of Inspections, Tests, Analyses and Acceptance Criteria (ITAAC).

Upon completion of Startup and entrance into the operations phase this position is eliminated and the responsibilities of the Manager, Turnover/Startup are transferred to the Plant General Manager Units 3 & 4.

1.1.8 Manager, Construction

The Manager, Construction reports directly to the Vice President, Engineering and Construction and is responsible for interfacing with the EPC contractor for activities at STP 3 & 4 related to: constructing, fabricating, cleaning, handling, erecting, installing, and modifying structures, systems and components.

Upon completion of Startup, and entrance into the operations phase, this position and the responsibilities of the Manager, Construction are no longer necessary and therefore are eliminated.

1.1.9 General Manager Support Services

The General Manager Support Services reports directly to the Group Vice President and is responsible for implementing QAP requirements applicable to the following functions: Supply Chain, Records Management, and Information Technology.

Upon transition to the operations phase this position is eliminated. Roles and responsibilities of the General Manager Support Services are transferred to the Vice President Shared Services.

1.1.10 Manager, Supply Chain

The Manager, Supply Chain, reports to the General Manager Support Services and is responsible for:

- Directing procurement of materials, items, and services for STP 3 & 4;

- Coordinating with the Managers, Engineering and Quality to ensure the inclusion of appropriate technical, regulatory, administrative, quality, and reporting requirements in procurement documents; and
- Providing oversight of supplier activities to assure procurement document requirements are met.

Upon transition to the operations phase this position is eliminated. Roles and responsibilities of the Manager, Supply Chain are transferred to the Manager, Financial Services.

1.1.11 Supervisor, Records Management and Document Control

The Supervisor, Records Management and Document Control reports to the General Manager Support Services and is responsible for receipt, storage, and retrieval of documents and Quality Assurance Records as described in this manual.

Upon transition to the operations phase this position is eliminated. Roles and responsibilities of the Supervisor, Records Management and Document Control are transferred to the Manager, Information Management.

1.1.12 Supervisor, Information Technology

The Supervisor, Information Technology reports to the General Manager Support Services and is responsible for STP 3 & 4 Software QA administration.

Upon transition to the operations phase this position is eliminated. Roles and responsibilities of the Supervisor, Information Technology are transferred to the Manager, Information Management.

1.1.13 Plant General Manager

The Plant General Manager reports to the Group Vice President and is responsible for activities related to the preparation for operation and maintenance of STP 3 & 4. The Plant General Manager's responsibilities include:

- Staffing and training of operations, maintenance, and generation support personnel;
- Interfacing with the EPC contractor to conduct testing of plant equipment; and
- Receiving plant equipment from the EPC contractor and maintaining that equipment thereafter.

Upon entrance into the operations phase this position is eliminated and the responsibilities of the Plant General Manager related to operations and maintenance are transferred to the Plant General Manager Units 3 & 4. Responsibilities associated with training are transferred to the General Manager Generation Support.

1.1.14 Manager, Maintenance

The Manager, Maintenance reports to the Plant General Manager and is responsible for developing processes to establish a fully staffed maintenance organization. Additionally, the Manager, Maintenance is responsible for implementing processes related to interfacing with the EPC contractor to receive and maintain plant equipment.

Upon transition to the operations phase this position is eliminated. The roles and responsibilities of the Manager, Maintenance are transferred to the Manager, Maintenance Units 3 & 4.

1.1.15 Manager, Operations

The Manager, Operations reports to the Plant General Manager and is responsible for developing processes to establish a fully staffed operations organization. Additionally, the Manager, Operations is responsible for implementing processes related to interfacing with the EPC contractor to test and operate plant equipment.

Upon transition to the operations phase this position is eliminated. Roles and responsibilities of the Manager, Operations are transferred to the Manager, Operations, Units 3 & 4.

1.1.16 Manager, Training

The Manager, Training reports to the Plant General Manager and is responsible to develop and implement a process to train a fully staffed STP 3 & 4 operations and maintenance organization.

Upon transition to the operations phase this position is eliminated. Roles and responsibilities of the Manager, Training are transferred to the Manager, Training who reports to the GM, Generation Support as shown on Figure II.1-2.

1.1.17 Agents and Contractors

STPNOC is the Applicant/Licensee of STP 3 & 4 and maintains control and oversight of design, procurement, construction, and testing performed by Toshiba Corporation, the EPC contractor.

STPNOC has contracted Bechtel Power Corporation to provide consulting services as the OE in connection with the licensing, development, engineering, procurement and construction of STP 3 & 4. Additionally, STPNOC may request the OE to provide certain technical services including preparation of studies to form design bases and preparation of designs which are not specifically included in the EPC contract.

1.2 Transition to Operations

No later than six months prior to fuel load, those positions which are shown on Figure II.1-2 will be staffed and have the appropriate authority required to perform operations activities. It is anticipated that even after fuel load, construction activities will be ongoing. Those positions required to support these activities will retain their applicable construction/preoperation responsibilities until it is deemed that they are no longer necessary.

As the construction of systems (or portions thereof) are completed, all control and authority (including oversight, configuration and operations) is transferred from the EPC contractor to the applicable STPNOC departments having cognizance in the operations phase. During the transition, responsibilities will be clearly defined in instructions and procedures to ensure appropriate authority is always maintained for each structure, system, and component.

1.3 Operations Phase

The following roles and responsibilities correspond to those positions shown on Figure II.1-2 and are applicable only during the operations phase for Units 3 & 4.

1.3.1 Chief Operating Officer/Chief Nuclear Officer (COO/CNO)

The COO/CNO reports to the President and CEO and is responsible for implementing quality program requirements applicable to the overall efforts associated with STPNOC (Units 1 through 4) activities.

1.3.2 Site Vice President

The Site Vice President reports to the COO/CNO and has overall responsibility for implementing quality program requirements related to: operations, maintenance, work control, outages, training, chemistry, radiological controls, plant protection, and station support.

1.3.3 Plant General Manager Units 3 & 4 (PGM)

The PGM reports to the Site Vice President and is responsible for the overall day-to-day operations of Units 3 & 4. The PGM is responsible for Operations, Maintenance, Work Control and Outage Management. The PGM is also responsible for coordination of activities such as refueling and decommissioning.

1.3.4 Manager, Operations, Units 3 & 4

The Manager, Operations, Units 3 & 4 reports to the PGM and is responsible for development of operations programs and implementation of quality program requirements associated with the day-to-day operation of Units 3 & 4.

1.3.5 Manager, Maintenance, Units 3 & 4

The Manager, Maintenance, Units 3 & 4 reports to the PGM and is responsible for development of maintenance programs and implementation of quality program requirements associated with maintenance of Units 3 & 4.

1.3.6 General Manager Generation Support (GMGS)

The GMGS reports to the Site Vice President and is responsible for providing services which support the day-to-day operations of STPNOC (Units 1 through 4). The GMGS is responsible for Training, Radiation Protection, Chemistry, Environmental, Plant Protection (Nuclear Security and Personnel Access), Performance Improvement (Corrective Action Program), Metrology, and Procedure Development.

1.3.7 Manager, Training

The Manager, Training reports to the GMGS and is responsible for the development of training programs and implementing quality requirements associated with training.

1.3.8 Vice President Engineering

The Vice President Engineering reports to the COO/CNO and is responsible for quality program requirements applicable to the following functions: fuels and analysis, engineering (testing

programs, design engineering, systems engineering, maintenance engineering), and Engineering Programs.

1.3.9 General Managers of Engineering

Each pair of units (i.e. Units 1 & 2 or Units 3 & 4) has a General Manager of Engineering (GME) who reports to the Vice President Engineering and will be responsible for the overall day-to-day engineering of their respective units. Each GME is responsible for Maintenance Engineering, Design Engineering, Testing, and Systems Engineering.

1.3.10 Manager, Fuels

The Manager, Fuels reports to the Vice President Engineering and is responsible for implementing the fuels management program which includes Fuel Analysis and Fuels Engineering activities.

1.3.11 Manager, Engineering Programs

The Manager, Engineering Programs reports to the Vice President Engineering and is responsible for the development and implementation of Engineering Department Programs e.g. Inservice Inspection (ISI), Inservice Testing (IST), and Maintenance History.

1.3.12 General Manager Projects/Alliances

The General Manager Projects/Alliances reports to the COO/CNO and is responsible for developing alliances with outside vendors to support STPNOC (Units 1 through 4).

1.3.13 General Manager, Oversight and Regulatory Affairs

The General Manager, Oversight and Regulatory Affairs reports to the President and CEO and is responsible for implementing quality program requirements applicable to the overall efforts of STPNOC (Units 1 through 4) including those listed in paragraph 1.3 of this section.

1.3.14 Manager, Licensing

The Manager, Licensing reports directly to the General Manager, Oversight and Regulatory Affairs and is responsible for interfacing with the Nuclear Regulatory Commission.

1.3.15 Manager, Quality

The Manager, Quality reports directly to the General Manager, Oversight and Regulatory Affairs with the authority to go directly to the President and CEO and is responsible for implementing quality program requirements applicable to STPNOC (Units 1 through 4) including those listed in paragraph 1.3 of this section.

1.3.16 Manager, Risk Management

The Manager, Risk Management reports directly to the General Manager, Oversight and Regulatory Affairs and is responsible for implementing Probabilistic Risk Management programs for STPNOC (Units 1 through 4).

1.3.17 Manager, Employee Concerns Program

The Manager, Employee Concerns Program reports directly to the President and CEO and is responsible for implementation of the Employee Concerns Program for STPNOC (Units 1 through 4).

1.3.18 Vice President Shared Services

The Vice President Shared Services reports directly to the President and CEO and is responsible for implementing QAPD requirements applicable to the following functions: Supply Chain, Records Management, and Information Technology.

1.3.19 Manager, Information Management

The Manager, Information Management reports directly to the Vice President Shared Services and is responsible for information technology programs including administration of the Records Management program for STPNOC (Units 1 through 4)

1.3.20 Manager, Financial Services

The Manager, Financial Services reports directly to the Vice President Shared Services and is responsible for the financial and business programs and process, and the supply chain activities for STPNOC (Units 1 through 4), including the procuring, shipping, receiving, handling, and storing of structures, systems and components prior to installation into Units 3 & 4.

1.4 Authority to Stop Work

The Group Vice President and the Vice President, Oversight and Regulatory Affairs, and the Manager, Quality have the authority to stop work for cause for construction/preoperation activities. The COO/CNO, GM, Oversight and Regulatory Affairs, and the Manager, Quality have authority to stop work for cause for operations activities. This authority has been granted by the President and CEO.

Quality assurance and inspection personnel have the authority, and the responsibility, to stop work in progress which is not being done in accordance with approved procedures or where safety or SSC integrity may be jeopardized. This extends to off-site work performed by suppliers furnishing safety-related materials and services to STPNOC.

1.5 Quality Assurance Organizational Independence

For development of safety-related information used to prepare the COL application and construction, independence shall be maintained between the organization or organizations performing the checking (quality assurance and control) functions and the organizations performing the functions. This provision is not applicable to design review/verification.

1.6 NQA-1-1994 Commitment

In establishing its organizational structure, STPNOC commits to compliance with NQA-1-1994, Basic Requirement 1 and Supplement 1S-1.

Figure II.1-1 STPNOC Construction/Pre-operation Organization

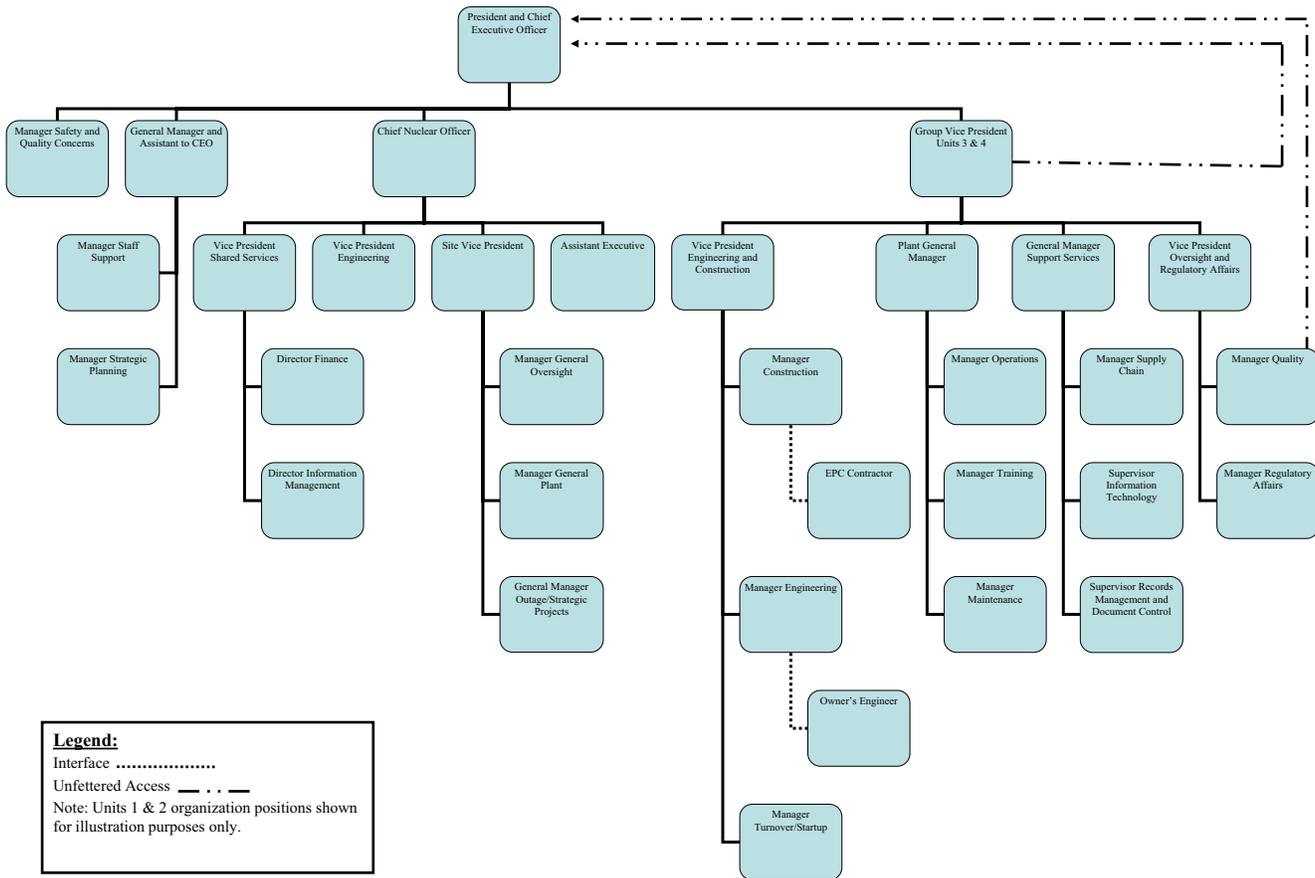
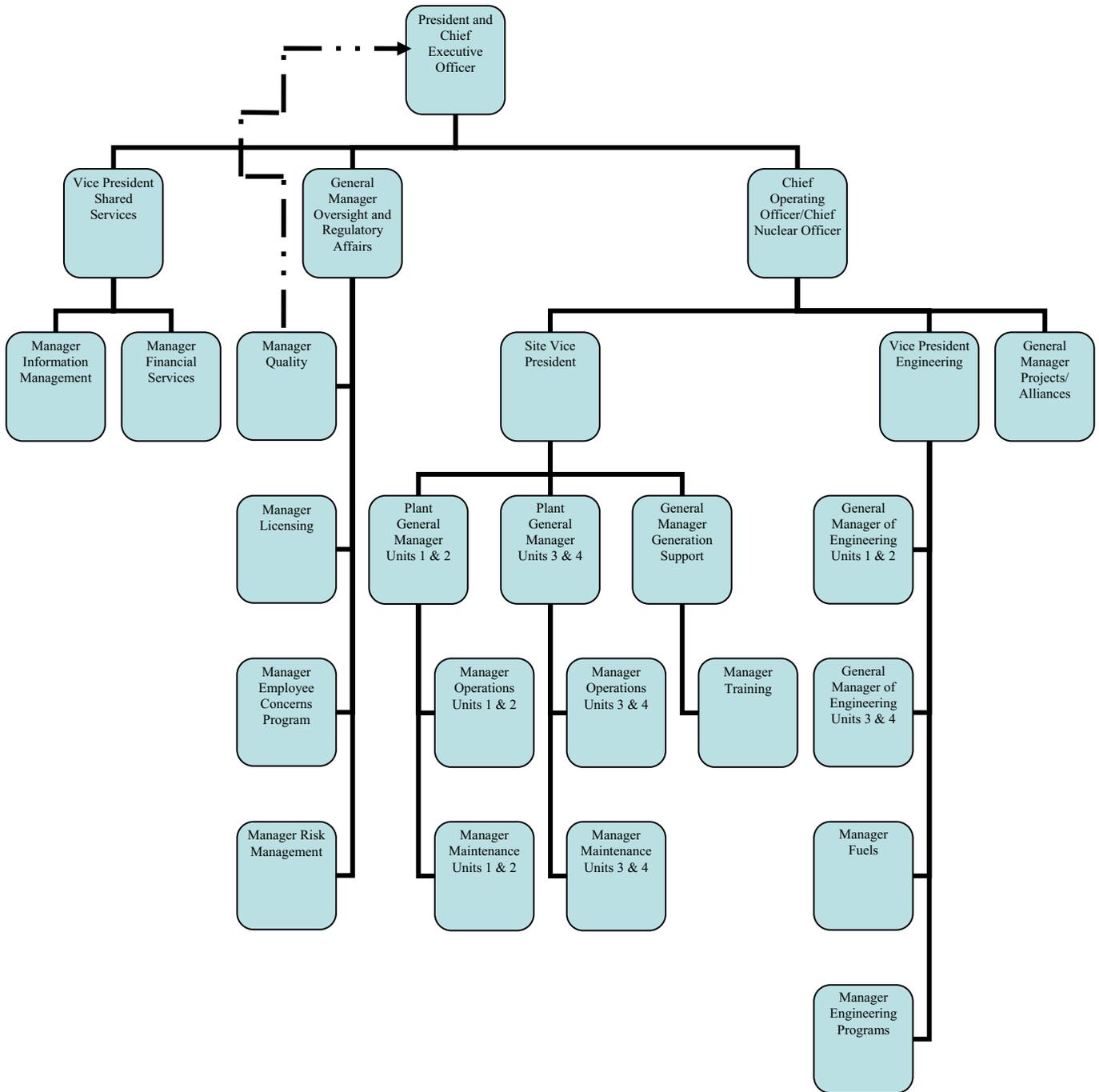


Figure II.1-2 STPNOC Organization Four Unit Commercial Operation



Response to question c):

STPNOC plans to comprehensively evaluate NRC approved revisions to NEI 06-14A and revise the STP 3 & 4 QAPD to incorporate applicable changes.

During the period prior to NRC approval of the STP 3 & 4 QAPD, changes will be made as part of the COLA revision process. Section 2.5, Issuance and Revision to Quality Assurance Program, of NEI 06-14A and the STP 3 & 4 QAPD require that the QAPD "...shall be revised as appropriate to incorporate additional QA commitments that may be established during the COL application development process." It is expected that this will include the three specific examples of changes cited by the NRC in question c) above, which are anticipated to be included in NRC approved Revision 5 to NEI 06-14A.