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To: [Paul, Jamie](#)
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Subject: Request for Additional Information - Operations Quality Assurance Plan (OOAP), Revision 20 - TACs ME8955 and ME8956
Date: Thursday, August 30, 2012 10:39:00 AM
Attachments: [ME8955-RAI.docx](#)

Jamie:

Based on the review of the proposed changes to the Operations Quality Assurance Plan (OOAP), Revision 20 by Change No. QA-074, submitted by letter dated June 4, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff has determined that additional information is required to complete its review. Please note that the submittal identified Ms. D. I. Towler as person for contact for additional questions.

Request for Additional (RAI) is attached. Dart copy of the RAI was transmitted via e-mail on August 27, 2012. Mr. Jim Morris of your organization informed the NRC staff on August 29, 2012 that a clarification call is not needed. You are requested to respond to the RAI request within 30 days from the date of this e-mail. Please treat this e-mail as formal communication of the RAI. A copy of this e-mail will be placed in Agencywide Documents Access and Management System (ADAMS) of the NRC.

Thanks.

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**Request for Additional Information
Regarding the South Texas Project (STP), Units 1 and 2
Operations Quality Assurance Plan (OQAP), Revision 20**

1. Organization

Title 10 of the *Code of Federal Regulations* (10 CFR), Appendix B of Part 50, states in part that the authority and duties of persons and organizations performing activities affecting the safety-related functions of structures, systems, and components shall be clearly established and delineated in writing. These activities include both the performing functions of attaining quality objectives and the quality assurance functions. The persons and organizations performing quality assurance functions shall have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions.

Through the use of an organizational chart, please provide clarification on how the South Texas Project Nuclear Operating Company (STPNOC) ensures that the authority and duties of its organization performing activities is clearly established and delineated for personnel performing activities affecting quality. Additionally, in the organizational chart please clearly depict how personnel performing quality assurance functions have sufficient organizational freedom to identify, initiate, and resolve quality problems.

2. Control of Measuring and Test Equipment

Standard Review Plan (SRP) Section 17.5, paragraph II.L.8., states that for procurement of commercial-grade calibration services for safety-related applications, laboratory accreditation programs administered by the National Institute of Standards and Technology and by the American Association for Laboratory Accreditation, as recognized through the mutual recognition arrangement of the International Laboratory Accreditation Program (ILAC), are acceptable in lieu of a supplier audit, commercial-grade survey, or in-process surveillance provided that all of the following conditions are met:

- a) The alternative method is documented in the quality assurance (QA) program description;
- b) Accreditation is to ANSI/ISO/IEC 17025, "General Requirements for the Competence of Testing and Calibration Laboratories;"
- c) Use of the alternative method is limited to the National Voluntary Laboratory Accreditation Program and the American Association for Laboratory Accreditation, as recognized by ILAC signatories;
- d) The scope of the accreditation covers the contracted services;
- e) Purchase documents impose additional technical and administrative requirements to satisfy necessary QA program and technical requirements;
- f) Purchase documents require reporting as-found calibration data when calibrated items are found to be out-of-tolerance;
- g) Purchase documents require identification of the laboratory equipment/standards used;
- h) The alternative method is limited to the domestic calibration service suppliers;
- i) The alternative method is applicable to sub-suppliers of calibration service suppliers, provided the above conditions are met.

U.S. Nuclear Regulatory Commission (NRC) staff has noted the following during its review of the QQAP:

- STPNOC QQAP Section 2.0, Table I “Program Commitments,” under ANSI N45.2.13, 1976, did not include condition h) and condition i) mentioned above.
- STPNOC QQAP Section 2.0, Table I “Program Commitments,” under Regulatory Guide 1.144, rev.1 did not include condition e) through condition i) mentioned above.
- STPNOC QQAP Section 7.0, paragraph 5.2.2.1 did not include condition h) and condition i) mentioned above.
- STPNOC QQAP Section 7.0, paragraph 5.6.3 did not include condition e) through condition i) mentioned above.

Please provide clarification as to whether STPNOC intends to implement this alternative consistent with Section 17.5, paragraph II.L.8 of the SRP.