

SOUTHERN CALIFORNIA EDISON COMPANY
TOPICAL REPORT SCE-1-A CHANGE NOTICE
PAGE 1 OF 2

Change Notice Number: 37

Affected Amendment: 12

Affected Pages: 17.1-19, 17.1-50, 17.2-8, 17.2-16, 17.2-20,
17.2-64

Description of Change:

The Nuclear Oversight Division in-line review and approval of drawings and specifications is being revised to reflect the use of an audit, surveillance, and assessment program to monitor the adequacy of the design process. Drawings and design specifications will no longer be reviewed and approved as an in-line function by the Nuclear Oversight Division. Appropriate surveillances, audits, and vertical assessments will be conducted to assure that drawings and specifications include appropriate quality assurance requirements.

Reason For Change (including basis for concluding that the change satisfies the criteria of 10CFR50, Appendix B, and the quality assurance program commitments previously accepted by the NRC):

The Nuclear Oversight Division is instituting a specialized function wherein selected design changes and systems are reviewed by a team of Nuclear Oversight Division personnel to assess the adequacy of the design, including potential impact on operations, using vertical assessment techniques. This function will replace the in-line review function presently employed by the Nuclear Oversight Division which was limited to review of quality assurance requirements included in drawings and specifications. The organizations presently responsible for development, review, and approval of drawings and specifications are required to assure that these documents contain appropriate quality assurance requirements. The Nuclear Oversight Division will assure through appropriate surveillances and audits that process controls are maintained by the responsible organizations related to drawings and specifications to achieve compliance with regulatory requirements contained in 10CFR50, Appendix B, Criteria III, V, VI, and XVII. In addition, the new vertical assessment function will provide additional reviews of the technical adequacy of the plant design and changes thereto to ensure that the associated equipment will meet its intended safety function.

SOUTHERN CALIFORNIA EDISON COMPANY
TOPICAL REPORT SCE-1-A CHANGE NOTICE
PAGE 2 OF 2

Reason For Change (Continued):

New initiatives undertaken by Southern California Edison to improve design control processes have been discussed with NRC Region V and Resident Inspectors. It is anticipated that the new Nuclear Oversight Division focus on adequacy of technical performance will be significantly more effective than current in-line quality assurance reviews.

Additionally, the Organizational Chart, Figure 17.2-1, has been redrawn for better legibility and included for information.

Change X does does not reduce commitments previously accepted by the NRC.

Approvals:

Brian Katz
Manager of Nuclear Oversight

Harold B. Ray
Vice President

Date Submitted to NRC: May 11, 1990

List of Effective Pages (continued)

<u>Page No.</u>	<u>Amendment No.</u>	<u>Amendment 12</u> <u>Change Notice #35</u>
17.2-23	5	
17.2-24	5	17-vii, 17-1-2, 17.1-3,
17.2-25	12	17.1-3a, 17.1-4, 17.1-6,
17.2-26	1	17.1-8, 17.1-9, 17.1-10
17.2-27	6	17.1-12, 17.1-15, 17.1-17
17.2-28	12	17.1-18, 17.1-19, 17.1-19a
17.2-29	12	17.1-21, 17.1-22, 17.1-24
17.2-30	5	17.1-27, 17.1-28, 17.1-29
17.2-31	5	17.1-35, 17.1-36, 17.1-37,
17.2-32	5	17.1-38, 17.1-39, 17.1-40
17.2-33	Original	17.1-41, 17.1-42, 17.1-43,
17.2-34	12	17.1-44, 17.1-45, 17.1-45a
17.2-35	12	17.1-50, 17.1-51, 17.2-3,
17.2-36	12	17.2-4, 17.2-5, 17.2-6, 17.2-7a
17.2-37	10	17.2-8, 17.2-9, 17.2-11, 17.2-12,
17.2-38	10	17.2-13, 17.2-13a, 17.2-16,
17.2-39	10	17.2-17, 17.2-18, 17.2-20,
17.2-39a	10	17.2-21, 17.2-23, 17.2-24
17.2-39b	10	17.2-25, 17.2-27, 17.2-29
17.2-40	12	17.2-30, 17.2-32, 17.2-33
17.2-41	12	17.2-35, 17.2-36, 17.2-38,
17.2-42	12	17.2-39a, 17.2-39b, 17.2-40
17.2-43	12	17.2-41, 17.2-42, 17.2-43
17.2-44	12	17.2-44, 17.2-45, 17.2-47
17.2-45	12	17.2-48, 17.2-49, 17.2-51
17.2-46	12	17.2-52, 17.2-53, 17.2-54
17.2-47	12	17.2-58
17.2-48	12	
17.2-49	10	Amendment 12
17.2-50	10	Change Notice #36
17.2-51	6	17-vii, 17.0-2, 17.0-3,
17.2-52	5	17.0-4, 17.1-1, 17.1-4,
17.2-53	7	17.1-22, 17.1-32, 17.1-45,
17.2-54	12	17.1-50, 17.1-51, 17.2-1,
17.2-55	8	17.2-5, 17.2-6, 17.2-8,
17.2-56	6	17.2-10, 17.2-12, 17.2-25,
17.2-57	6	17.2-64
17.2-58	12	
17.2-59	6	Amendment 12
17.2-60	6	Change Notice #37
17.2.61	6	17-vii, 17.1-19, 17.1-50,
17.2-62	6	17.2-8, 17.2-16, 17.2-20,
17.2-63	12	17.2-64
17.2-63a	12	
17.2-64	7	
17.2-65	7	
17.A-1	1	
17.A-2	1	
17.A-3	1	
17.A-4	1	
17.A-5	1	
17.A-6	2	
17.A-7	2	

17.1.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

17.1.5.1 Scope

This subsection describes the measures utilized by SCE to assure that activities affecting quality are prescribed by, and accomplished in accordance with, appropriate instructions, procedures, and drawings.

17.1.5.2 Instructions, Procedures, and Drawings

The SCE Quality Assurance Program includes provisions which require that work be accomplished in accordance with documented instructions, procedures, and drawings.

Instructions, procedures, and drawings are prepared, reviewed, approved, and controlled by organizations which implement Quality-Affecting Activities. These documents specify the requirements and/or methods to be utilized for compliance with the requirements of the SCE Quality Assurance Program. They include appropriate qualitative and quantitative acceptance criteria, as applicable, to determine that designated activities are accomplished in a satisfactory manner.

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Instructions, procedures, and drawings, including revisions, thereto, prepared by SCE are reviewed and approved by organizations responsible for the work. The Nuclear Oversight Division reviews and approves prior to issuance quality assurance programmatic procedures and procedures which define inspection nondestructive examination requirements. In addition, other quality affecting procedures are subject to review by the Nuclear Oversight Division at its discretion. Appropriate surveillance, audits, and assessments will be conducted by Nuclear Oversight Division to assure that quality affecting instructions, procedures, drawings, and specifications comply with the quality assurance program requirements. Maintenance, modification and inspection procedures and work order documentation are reviewed by the Nuclear Oversight Division to determine: (1) the need for inspection, identification of inspection personnel and documentation of inspection results; and (2) that the inspection requirements, methods and acceptance criteria are identified.

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Changes to instructions, procedures, specifications, and drawings are reviewed and approved in the same manner as original documents. Project Management personnel are responsible for assuring that instructions, procedures, and drawings, including revisions thereto, are reviewed by the appropriate SCE organizations.

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TABLE 17.1-3

NUCLEAR OVERSIGHT DIVISION ACTIVITIES
DESIGN AND CONSTRUCTION

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The following are SCE Nuclear Oversight Division personnel activities during the design and construction of nuclear generating stations:

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1. Review and approve procurement documents to verify incorporation of appropriate quality assurance requirements.
2. Develop quality assurance chapters for PSAR's and FSAR's and prepare quality assurance Topical Reports.
3. Prepare and maintain quality assurance manuals, procedures and instructions.
4. Review and approve quality assurance procedures and instructions developed by other internal organizations.
5. Evaluate and approve potential bidder's quality assurance manuals. Conduct internal audits of SCE organizations.
6. Initiate nonconformance reports, corrective action reports, and followup to assure proper implementation of corrective action.
7. Participate in and provide quality assurance training.
8. Provide written reports to management regarding status of activities, corrective actions required, or unresolved problems.
9. Support the Corporate Documentation Management Centers and Document Control Centers to assure proper filing and retention of appropriate quality assurance documentation.

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TABLE 17.2-3

NUCLEAR OVERSIGHT DIVISION ACTIVITIES
OPERATION

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The following are Nuclear Oversight Division personnel activities during the operational phase of nuclear generating stations including the support of Engineering Construction Projects (ECP's):

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| 1. Review and approve procurement documents to verify inclusion of appropriate quality assurance requirements. | 5 12CN#37 |
| 2. Prepare and maintain quality assurance manuals, procedures, and instructions. Maintain quality assurance chapters in FSAR's current. Maintain Topical Reports. | |
| 3. Review and approve quality assurance procedures and instructions prepared by other internal organizations. | |
| 4. Evaluate and approve potential supplier's quality assurance manuals. | 5 |
| 5. Perform quality assurance preaward surveys of potential suppliers' facilities and quality assurance programs. | |
| 6. Perform inspection and surveillance at supplier's facilities. | |
| 7. Conduct internal surveillances, audits, and assessments of SCE organizations and external audits of A-E's or other contractors and suppliers to SCE. Reaudit to verify implementation of corrective action. | 12CN#37 |
| 8. Initiate nonconformance reports, corrective action reports, and follow up to assure proper implementation of corrective action. | |
| 9. Participate in and provide quality assurance training. | |
| 10. Provide written reports to management regarding status of quality assurance activities, corrective actions required, or unresolved problems. | 7 |
| 11. Support the Corporate Documentation Management Center to assure proper filing and retention of appropriate quality assurance documentation. | 7 |

17.2.3.2 (continued)

stress, thermal, hydraulic, radiation, and accident analyses. Consultants may be utilized to review and verify the design of certain items.

Where design verification cannot be adequately accomplished by the design review process, alternate calculations or qualification testing is employed. These alternate methods of design verification are required to be defined in design documentation.

Records of design reviews, and associated design documents are required by internal written procedures to be maintained in the SONGS CDM Center. 5
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The SCE Nuclear Oversight Division is responsible for performing periodic audits, as described in Subsection 17.2.18, of SCE departments, A-E's, and other contractors to verify effective implementation of design control requirements. These audits include verification that appropriate design review records are maintained and deviations from quality standards are controlled. 12CN#35

17.2.3.2.1 Engineering Construction Projects (ECP's)

For ECPs, the following measures are applied in addition to those defined in 17.2.3.2. 5(CN#2)

Design work associated with ECP's at nuclear generating stations is performed by the Nuclear Engineering, Safety and Licensing Department and Nuclear Generation Site Department or contracted. In either case, a Project Manager is assigned overall responsibility for management and control of the ECP's, including design interfaces. The Nuclear Oversight Division performs, or delegates to qualified contractors, the pertinent quality assurance activities. 12CN#31
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The Project Engineer is responsible for assuring that ECP design documentation, and changes thereto, are distributed by SONGS CDM Center to responsible individuals with established review request forms in a timely manner. He is also responsible for assuring that errors and deficiencies noted in the review comments are corrected or otherwise resolved. 5
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Safety-Related design documentation and changes thereto prepared by an A-E or contractor for ECP's are controlled in accordance with their SCE-approved quality assurance programs. In addition, selected documents are required by written procedures to be submitted to SCE for design review and approval. This review is performed by cognizant Nuclear Generation Site and Nuclear Engineering, Safety and Licensing Departments in accordance with internal written procedures similar to those for SCE-prepared documentation. 12CN#31
12CN#35
12CN#37

17.2.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

17.2.5.1 Scope

This subsection describes the measures utilized by SCE to assure that activities affecting quality are prescribed by, and accomplished in accordance with appropriate instructions, procedures, and drawings.

17.2.5.2 Instructions, Procedures, and Drawings

The SCE Quality Assurance Program includes provisions which require that work be accomplished in accordance with documented instructions, procedures, and drawings.

Instructions, procedures, and drawings are prepared, reviewed, approved, and controlled by individuals and organizations which implement Quality-Affecting Activities. These documents specify the requirements and/or methods to be utilized for compliance with the SCE Quality Assurance Program. They include appropriate qualitative and quantitative acceptance criteria, as applicable, to determine that designated activities are accomplished in a satisfactory manner.

Instructions, procedures, and specifications prepared by station personnel for control of design are reviewed and approved by the Station Manager or designated representative.

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The Nuclear Oversight Division reviews and approves prior to issuance quality assurance programmatic procedures and procedures which define inspection/nondestructive examination requirements. In addition, other quality affecting procedures are subject to review by the Nuclear Oversight Division at its discretion. Appropriate surveillances, audits, and assessments will be conducted by the Nuclear Oversight Division to assure that quality affecting instructions, procedures, drawings, and specifications comply with the quality assurance program requirements. Maintenance, modification and inspection procedures and work order documentation are reviewed by the Nuclear Oversight Division to determine: (1) the need for inspection, identification of inspection personnel and documentation of inspection results; and (2) that the inspection requirements, methods, and acceptance criteria are identified.

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Changes to approved instructions, procedures, specifications, and drawings are reviewed and approved in the same manner as original documents.

The SCE Nuclear Oversight Division verifies by means of audits, as described in Subsection 17.2.18, that instructions, procedures, and drawings required for performing Safety-Related activities are controlled in compliance with established program commitments.

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