



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

November 11, 2013
NOC-AE-13003050
File No.: G09.19
10CFR50.54(a)
STI: 33775002

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Submittal of Operations Quality Assurance Plan Change QA-080

The STP Nuclear Operating Company (STPNOC) submits the attached change to revision 20 of the Operations Quality Assurance Plan (OQAP). These changes provide the necessary revision to the applicable chapters of the OQAP to incorporate an organizational realignment.

This change therefore does not represent a reduction in commitment and does not require NRC approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(3).

There are no commitments in this letter.

If there are any questions regarding this matter, please contact Mr. T. F. Walker at (361) 972-7392 or John Savage at (361) 972-7765.

A handwritten signature in black ink, appearing to read 'Dennis L. Koehl', is written over the typed name.

Dennis L. Koehl
President and CEO

Attachment: Operations Quality Assurance Plan change QA-080

Q004
NHL

cc:
(paper copy)

Regional Administrator, Region IV
U. S. Nuclear Regulatory Commission
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Balwant K. Singal
Senior Project Manager
U.S. Nuclear Regulatory Commission
One White Flint North (MS 8 B1)
11555 Rockville Pike
Rockville, MD 20852

Senior Resident Inspector
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code: MN116
Wadsworth, TX 77483

Jim Collins
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

(electronic copy)

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

Balwant K. Singal
U. S. Nuclear Regulatory Commission

John Ragan
Chris O'Hara
Jim von Suskil
NRG South Texas LP

Kevin Pollo
Richard Pena
City Public Service

Peter Nemeth
Crain Caton & James, P.C.

C. Mele
City of Austin

Richard A. Ratliff
Texas Department of State Health
Services

Robert Free
Texas Department of State Health
Services

CHANGE QA-080
SUMMARY OF CHANGES
Page 1 of 3

ALL CHANGES ARE IN BOLD TYPE

| CHAPTER | LOCATION | ACTION | TEXT |
|---------|----------|---|---|
| TOC | CH 1.0 | INSERT | QA-080 |
| | CH 16.0 | INSERT | QA-080 |
| CH 1.0 | 5.1 | DELETE | Senior Vice President, Operations |
| | | INSERT | Site Vice President, General Manager, Corporate Communications, and General Manager, Financial Services |
| | 5.3 | DELETE | Senior Vice President, Operations (2 places) and operations, regulatory affairs, plant protection (emergency response, plant protection support, security, access authorization), projects, and nuclear oversight |
| | | INSERT | Site Vice President (2 places) and staffing STP with qualified personnel and acquiring and coordinating the assistance of internal and external organizations for the following functions including: plant general management, engineering, training, and regulatory affairs |
| | 5.3.1 | DELETE | The Site Vice President is responsible for implementing quality program requirements applicable to staffing STP with qualified personnel and acquiring and coordinating the assistance of internal and external organizations for the following functions including: plant general management, engineering, and training. The senior management of these functions report to the Site Vice President. |
| | | INSERT from deleted 5.3.1.1 and 5.3.1.2 | The Plant General Manager has prime responsibility for the safe operations of the units. The plant staff, under the direction of the Plant General Manager, develops detailed procedures and instructions for testing, operation, modification, and maintenance of the STP. The Plant General Manager is responsible for implementing quality program requirements applicable to the following functions including: operations, maintenance, chemistry, health physics, and work control. The management of these functions report to the Plant General Manager. |

CHANGE QA-080
SUMMARY OF CHANGES
Page 2 of 3

ALL CHANGES ARE IN BOLD TYPE

| CHAPTER | LOCATION | ACTION | TEXT |
|---------|-----------------------------|--------|---|
| CH 1.0 | 5.3.1.1 and 5.3.1.2 | DELETE | Text moved to 5.3.1 |
| | New 5.3.2 | INSERT | The new text is inserted from old 5.3.1.3 |
| | New 5.3.2.1 | INSERT | The new text is inserted from old 5.3.1.3.1 |
| | 5.4 | DELETE | fitness for duty program, contracts & procurement, information technology, support & technology, and records management system |
| | | INSERT | projects, security, support & information technology, nuclear oversight, and human resources, knowledge transfer and retention and organizational development. |
| | 5.4.1 | INSERT | The new text is inserted from old 5.3.2 |
| | New 5.4.1.1 through 5.4.1.3 | INSERT | The new text is inserted from old 5.3.2.1 through 5.3.2.3 |
| | New 5.4.2 | INSERT | The new text is inserted from old 5.3.3. Insert engineering before projects |
| | | DELETE | independent spent fuel storage installation and dry cask storage system |
| | New 5.4.3 | INSERT | The new text is inserted from old 5.4.1. Insert strategic projects |
| | New 5.4.4 | INSERT | The new text is inserted from old 5.4.3. Insert and access authorization |
| | New 5.5 | INSERT | The new text is inserted from old 5.4.2 |
| | New 5.6 | INSERT | The General Manager, Corporate Communications is responsible for implementing quality program requirements applicable to emergency response. The management of this function reports to the General Manager, Corporate Communications. |
| CH 16.0 | 5.1 | DELETE | Chief Nuclear Officer |
| | | INSERT | Vice President, Corporate Services |

CHANGE QA-080
SUMMARY OF CHANGES

ALL CHANGES ARE IN BOLD TYPE

| CHAPTER | LOCATION | ACTION | TEXT |
|---------|----------|--------|---|
| | | | |
| | 5.2 | INSERT | Assurance |
| | | | |
| CH 16.0 | 6.6 | DELETE | and Chief Nuclear Officer |
| | | | |
| | | INSERT | and before the President and Chief Executive Officer |

| | | |
|--|--|--|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN TABLE OF CONTENTS | NUMBER Chapter TABLE OF CONTENT | REV. NO. 20 |
| | PAGE 1 OF 2 | |
| | EFFECTIVE DATE 02-01-12 | |

| Chapter Number | Title Chapter | Effective Revision | Effective Date | Change Notice No. |
|----------------|--|--------------------|----------------|----------------------------------|
| | Definitions | 9 | 2-1-02 | QA-075 |
| 1.0 | Organization | 16 | 2-1-12 | QA-074, QA-075 QA-079, QA-080 |
| 2.0 | Program Description | 18 | 2-1-12 | QA-074,QA-075, QA-076, QA-079 |
| 3.0 | Conduct of Operation | 8 | 2-1-10 | QA-075 |
| 4.0 | Qualification, Training, and Certification of Personnel | 6 | 2-1-98 | QA-075 |
| 5.0 | Maintenance, Installation of Modifications, and Related Activities | 5 | 2-1-98 | QA-078 |
| 6.0 | Design and Modification Control | 10 | 2-1-12 | QA-078 |
| 7.0 | Procurement | 13 | 2-1-12 | QA-074, QA-076 QA-078, QA-079 |
| 8.0 | Control and Issuance of Documents | 6 | 2-1-98 | QA-078 |
| 9.0 | Control of Material | 6 | 2-1-98 | QA-078 |
| 10.0 | Inspection | 11 | 2-1-08 | QA-078 |
| 11.0 | Test Control | 8 | 2-1-08 | QA-078 |
| 12.0 | Instrument and Calibration Control | 6 | 2-1-98 | QA-078 |
| 13.0 | Control Of Conditions Adverse to Quality | 14 | 2-1-12 | QA-074, QA-078 QA-079 |

| | | |
|--|--|--|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN TABLE OF CONTENTS | NUMBER Chapter TABLE OF CONTENT | REV. NO. 20 |
| | PAGE 2 OF 2 | |
| | EFFECTIVE DATE 02-01-12 | |

| Chapter Number | Title | Effective Revision | Effective Date | Change Notice No. |
|----------------|---|--------------------|----------------|-------------------------------|
| 14.0 | Records Control | 8 | 2-1-06 | QA-074, QA-078 |
| 15.0 | Quality Oversight Activities | 13 | 2-1-12 | QA-074, QA-079 |
| 16.0 | Independent Technical Review | 12 | 2-1-12 | QA-074,QA-075, QA-080 |
| 17.0 | ASME Code Section XI – Repairs and Replacements | 10 | 2-1-12 | QA-074, QA-079 |
| 18.0 | ASME Code Section XI – Inservice Inspection and Testing | 11 | 2-1-12 | QA-074, QA-079 |
| 19.0 | Administrative Controls | 5 | 2-1-12 | QA-074, QA-075 QA-079 |
| 20.0 | Dry Cask Storage System and Independent Spent Fuel Storage Installation | 0 | 8-9-12 | QA-075, QA-077 QA-078, QA-079 |

| | | |
|---|---|------------------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER Chapter 1.0 | REV. NO. 16 |
| | PAGE 1 OF 4 | |
| | EFFECTIVE DATE 02-01-12 | |

1.0 PURPOSE

1.1 The purpose of this chapter is to describe the organizational structure as related to quality assurance and to establish the responsibilities of organizations for the South Texas Project (STP).

2.0 SCOPE

2.1 STP Nuclear Operating Company (STPNOC), as licensee, has the Quality responsibility for design, engineering, procurement, fabrication, modification, maintenance, repair, in-service inspection, refueling, testing, and operation of the STP Units 1 & 2, Dry Cask Storage System (DCSS), and Independent Spent Fuel Storage Installation (ISFSI).

QA-075

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 None

5.0 RESPONSIBILITIES

5.1 The STPNOC organization includes the Vice President, Corporate Services, Site Vice President, General Manager, Corporate Communications, and General Manager, Financial Services. The senior management of these groups report to the President and Chief Executive Officer.

QA-074, 079, 080

5.2 The President and Chief Executive Officer has overall responsibility for the implementation of the Operations Quality Assurance Program and approving the Operations Quality Assurance Plan (OQAP) and revisions thereto. The President and Chief Executive Officer shall designate those members of senior management to function as the Senior Management Team.

QA-074

5.3 The Site Vice President is responsible for implementing quality program requirements applicable to staffing STP with qualified personnel and acquiring and coordinating the assistance of internal and external organizations for the following functions including: plant general management, engineering, training, and regulatory affairs. The senior management of these functions report to the Site Vice President.

QA-074, 079, 080

| | | |
|---|---|--|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER Chapter 1.0 | REV. NO. 16 |
| | PAGE 2 OF 4 | |
| | EFFECTIVE DATE 02-01-12 | |

5.3.1 The Plant General Manager has prime responsibility for the safe operations of the units. The plant staff, under the direction of the Plant General Manager, develops detailed procedures and instructions for testing, operation, modification, and maintenance of the STP. The Plant General Manager is responsible for implementing quality program requirements applicable to the following functions including: operations, maintenance, chemistry, health physics, and work control. The management of these functions report to the Plant General Manager.

QA-074, 079, 080

5.3.2 The General Manager, Engineering is responsible for implementing quality program requirements applicable to the following functions: design engineering, testing/program engineering, systems engineering, maintenance engineering, special projects, and nuclear fuel & analysis (includes risk management). The management of these functions report to the General Manager, Engineering.

QA-074, 079

5.3.2.1 The Manager, Nuclear Fuel & Analysis is responsible for implementing quality program requirements applicable to the following functions: reactor engineering, core design, reload safety analysis, nuclear fuel performance and supply, risk management (probabilistic risk assessment and risk-informed applications).

Activities related to the Comprehensive Risk Management Program include oversight of Probabilistic Safety Assessment activities. The Comprehensive Risk Management Expert Panel guides the implementation of the Comprehensive Risk Management Program and is composed of a Chairman and additional senior level management designated by the President and Chief Executive Officer.

5.4 The Vice President, Corporate Services is responsible for implementing quality program requirements applicable to the following functions: projects, security, support & information technology, nuclear oversight, and human resources, knowledge transfer and retention and organizational development. The senior management of these functions report to the Vice President, Corporate Services.

QA-079 QA-074, 075, 079, 080

5.4.1 The Manager, Nuclear Oversight is responsible for implementing quality program requirements applicable to organizational effectiveness and quality assurance. The management of these functions report to the Manager, Nuclear Oversight.

| | | |
|---|---|--|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER Chapter 1.0 | REV. NO. 16 |
| | PAGE 3 OF 4 | |
| | EFFECTIVE DATE 02-01-12 | |

- 5.4.1.1 The Manager, Quality Assurance has the independence to conduct Quality activities without undue pressure of cost or schedule and is responsible for the following:

Development, maintenance, and independent verification of implementation of the STP Quality Program; making periodic reports on its effectiveness; review of selected documents which control activities within its scope; and preparation, control, and approval of the OQAP and revisions thereto;

Identify, initiate, recommend, or provide solutions to quality-related problems and verify the implementation and effectiveness of the solutions; and

Independent oversight activities, including audits, independent assessments, evaluations, surveillances, performance monitoring, inspections, independent oversight of NDE examinations, vendor oversight, and administration of organizational unit independent review activities.

- 5.4.1.2 The Manager, Nuclear Oversight and the Manager, Quality Assurance, at their discretion, have unfettered access to the President and Chief Executive Officer and the Board of Directors.

- 5.4.1.3 The Manager, Nuclear Oversight and the Manager, Quality Assurance have the authority to stop work for cause. This authority has been granted by the President and Chief Executive Officer. The Quality organization, including the inspection staff, is based upon the anticipated Quality involvement in operations, modification, and maintenance activities.

- 5.4.2 The General Manager, Projects (Outage/PIP/PMPI) is responsible for implementing quality program requirements applicable to the following functions: strategic projects, engineering projects, outage management, and major projects. The management of these functions report to the General Manager, Projects (Outage/PIP/PMPI).

QA-074, 079

QA-074, 075, 079, 080

| | | |
|---|---|--|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER Chapter 1.0 | REV. NO. 16 |
| | PAGE 4 OF 4 | |
| | EFFECTIVE DATE 02-01-12 | |

5.4.3 The General Manager, Support & Information Technology is responsible for implementing quality program requirements applicable to the following functions: information technology, cyber security, strategic projects, and records management. The management of these functions report to the General Manager, Support & Information Technology.

5.4.4 The General Manager, Human Resources, Knowledge Transfer & Organizational Development is responsible for implementing quality program requirements applicable to fitness for duty and access authorization. The management of this function reports to the General Manager, Human Resources, Knowledge Transfer & Organizational Development.

5.5 The General Manager, Financial Services is responsible for implementing quality program requirements applicable to contracts & procurement. The management of this function reports to the General Manager, Financial Services.

5.6 The General Manager, Corporate Communications is responsible for implementing quality program requirements applicable to emergency response. The management of this function reports to the General Manager, Corporate Communications.

6.0 REQUIREMENTS

6.1 The fundamental responsibility for implementing quality program requirements is assigned to all personnel performing activities affecting the safe and reliable operation of STP. These personnel and their management are responsible for implementing through approved procedures and other work documents, the quality assurance program controls described in the OQAP. Line organizational details and responsibilities for Units 1 & 2 are further described in STP UFSAR Chapter 13.1.

7.0 DOCUMENTATION

7.1 None

8.0 ATTACHMENTS

8.1 None

| | | |
|---|--|--|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN Independent Technical Review | NUMBER Chapter 16.0 | REV. NO. 12 |
| | PAGE 1 OF 3 | |
| | EFFECTIVE DATE 02-01-12 | |

1.0 PURPOSE

1.1 The purpose of this chapter is to describe the requirements and responsibilities for independent technical review for the South Texas Project (STP).

2.0 SCOPE

2.1 This chapter describes the independent technical review activities within the scope of the Operations Quality Assurance Plan (OQAP).

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

- 4.1 OQAP Chapter 1.0, Organization
- 4.2 OQAP Chapter 2.0, Program Description
- 4.3 OQAP Chapter 4.0, Qualification, Training, and Certification of Personnel
- 4.4 OQAP Chapter 13.0, Deficiency Control
- 4.5 OQAP Chapter 14.0, Records Control
- 4.6 OQAP Chapter 15.0, Quality Oversight Activities

5.0 RESPONSIBILITIES

- 5.1 The Vice President, Corporate Services is responsible for implementing quality program requirements including independent technical review.
- 5.2 The Manager, Quality Assurance is responsible for independent oversight activities performed to accomplish the independent technical reviews.

6.0 REQUIREMENTS

- 6.1 Independent oversight activities, as described in Reference 4.6, shall be performed in accordance with implementing procedures to ensure the completion of independent technical reviews.

| | | |
|---|--|--|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN Independent Technical Review | NUMBER Chapter 16.0 | REV. NO. 12 |
| | PAGE 2 OF 3 | |
| | EFFECTIVE DATE 02-01-12 | |

- 6.2 Independent technical reviews shall be used to observe and verify that activities are performed correctly and that human errors are reduced as much as practical.
- 6.3 Independent technical reviews shall include, but not be limited to, the following activities:
 - 6.3.1 Unit-operating characteristics
 - 6.3.2 Nuclear Regulatory Commission issuances
 - 6.3.3 Industry advisories
 - 6.3.4 Licensee Event Reports
 - 6.3.5 Other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety.
 - 6.3.6 Plant operations
 - 6.3.7 Maintenance activities
 - 6.3.8 Equipment modifications
 - 6.3.9 Independent Spent Fuel Storage Installation and Dry Cask Storage System
- 6.4 As determined by Quality management, several personnel performing independent technical reviews will be required to have a degree in engineering or related science and at least 3 years of professional level experience in the nuclear field.
- 6.5 Personnel performing independent technical reviews should be independent of performance function, signoff function, and the plant management chain while performing this oversight activity.
- 6.6 The results of independent technical reviews will be periodically transmitted to appropriate line and senior management, the Senior Management Team, and the President and Chief Executive Officer for review and/or action and to advise management on the overall quality and safety of operations.
- 6.7 Conditions adverse to quality and recommendations identified during the performance of independent technical reviews shall meet the requirements of Reference 4.4

QA-075

QA-074, 080

| | | |
|---|--|--|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN Independent Technical Review | NUMBER Chapter 16.0 | REV. NO. 12 |
| | PAGE 3 OF 3 | |
| | EFFECTIVE DATE 02-01-12 | |

7.0 DOCUMENTATION

7.1 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 Reference 4.5.

8.0 ATTACHMENTS

8.1 None