

Official
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June 30, 1992

Docket Nos. 50-269, 50-270, 50-287,
50-369, 50-370, 50-413, 50-414

License Nos. DPR-38, DPR-47, DPR-55,
NPF-9, NPF-17, NPF-35, NPF-52

Mr. H. B. Tucker, Senior Vice President
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Gentlemen:

SUBJECT: REVISIONS TO DUKE POWER COMPANY'S QUALITY ASSURANCE
(QA) PROGRAM

The changes for the Duke Power Company Topical Report (Duke-1-A), "Quality Assurance Program," which were submitted in your letter dated November 27, 1991, and the additional information you submitted dated April 6, 1992, have been reviewed. To complete our review, we have identified three additional items which require clarification. Please provide a response to the enclosed questions.

We appreciate your cooperation with us. If you have any questions concerning this request, please contact F. Jape of my staff on (404) 331-4182.

Sincerely,

(Original signed by J. J. Blake for)

Caudle A. Julian, Chief
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Enclosure:
Questions to Proposed
QA Program Changes

cc w/encl: (See page 2)

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ENCLOSURE

1. Request for additional information (RAI) 6 (and others) was asked in order to obtain a clearer understanding whether the scope of Duke Power Company's graded QA program meets NRC requirements and guidance. The response is acceptable in that a clear commitment to meet NRC's QA guidance for nonmetallic insulation for austenitic stainless steel and protective coatings has been added to Table 17.0-1. It is unacceptable in that these items are apparently not classified as QA Condition _____ where _____ is a designation such that quality is ensured commensurate with the item's importance to safety. They should be. Other items [such as ATWS equipment, safety parameter display systems, and the nonsafety-related items referred to in 10 CFR 50.65(b)(2)] should be similarly classified and controlled. "QA Condition 1" appears to be as limiting as "nuclear safety-related" and changing from one term to the other does not really help our understanding. Please clarify.

2. The response to RAI 27 indicates that an appropriate way to address SRP criteria C.2.c, d, e, and f is in the specific sections where they apply. This is acceptable to the staff. However, in light of the dashes (indicating no commitments) and the P's (indicating partial commitment) in the matrix below, consideration should be given as to whether these criteria should be applied to more functions than currently indicated. Please clarify.

<u>FUNCTION/CRITERION¹</u>	<u>C.2.c</u>	<u>C.2.d</u>	<u>C.2.e</u>	<u>C.2.f</u>
NSRB	-	-	-	-
Internal Audits	P	X	X	X
Safety Assurance	-	-	X	P
Corporate Audits	P	-	-	X
Int. Safety Assessments	-	-	-	P
Self-initiated T. Audits	P	-	-	P
Vendors	P	-	-	P

3. The responses to RAIs 13 (first sentence), 15, 18, 19, 21 (last sentence), and 23 should be included in the topical report. Please consider adding.

¹C.2.c Planning with acceptance criteria
C.2.d Graded approach
C.2.e Performance-based scheduling
C.2.f Results documents, reviewed, and followed-up