

Question 260.9N

Provide an organization chart which shows the relationship between the various organizations which will perform design work for STPEGS during the operations phase. Describe the function(s) of the "Engineering Assurance" organization shown on Figure 17.2-3 (Amendment 24). Describe the interface relationships and division of responsibilities between Engineering Assurance and Quality Assurance (QA). With each organization performing "its own design verification" per Section 17.2.3.4, describe how the independence of the verifier is assured.

Response [HISTORICAL INFORMATION]

The response to this question has three parts.

- (a) An organization chart is provided in Figure 17.2.-2
- (b) The purpose of the Engineering Assurance Program is to provide confidence in the technical adequacy of the engineering and design work performed by HL&P and its major contractors. The program consists of activities directed at assessing the adequacy of the technical aspects, as well as the methods of control, of the engineering and design activities of HL&P and its major contractors in producing a quality engineering product. This is accomplished by independently sampling the design activities and products for confirmation by analytical techniques. Therefore, the Engineering Assurance Program is in addition to and separate from normal QA measures established to meet the requirements of 10CFR50 Appendix B Criterion III, Regulatory Guide 1.64, and ANSI N45.2.11. The Engineering Assurance Department provides an ongoing third party design review over the balance of the construction program. The Engineering Assurance Department is supplemented by outside resources from competent engineering firms where and when required. In summary, the Engineering Assurance Program is an additional voluntary step taken by HL&P to provide confidence in design and engineering work performed for the South Texas Project. The inclusion of the Engineering Assurance Department on Figure 17.2-2 was for the sake of completeness and does not imply that the organization or its activities are part of the QA program for design.
- (c) The context of the statement in Section 17.2.3.4 is in regard to the organizations in Section 17.2.3.1. As stated, each organization will have procedures to cover the design verification. An element of these procedures will be the incorporation of ANSI N45.2.11 requirements on independence of the design verifier.

STPEGS UFSAR

Question 421.39

Following the third paragraph of FSAR Section 17.2.4.1, a paragraph that was present in Amendment 2 concerning procurement initiated by the Maintenance Department has been deleted in Amendment 4. This deletion is not noted in the margin, and it is not clear whether the deletion was intentional or not. If the deletion was unintentional, reinstate the paragraph. If intentional, explain why the paragraph was deleted.

Also, the last paragraph of the FSAR Section 17.2.4.1 still refers to "the Engineering Assurance Division of the QA Department," but this division is no longer shown on Figure 17.2-1. Clarify this discrepancy.

Response

The paragraph discussed was deleted intentionally. However, Section 17.2 has since been substantially revised, and this concern no longer applies.

STPEGS UFSAR

Question 421.49

Replace or justify the deletion of "and approval" from item 4 on page 17.2-17 which, in amendment 4, stated "After QA review and approval, the requisition is returned to the Plant Superintendent or the General Manager of the Generation Engineering Department (or their respective designees) for final approval". In lieu of "approval", "documented concurrence" would be an acceptable alternative.

Response

Sufficient measures have been established and implemented by having QA review procurement documents without approving them to meet the requirements of 10CFR50 Appendix B Criterion IV and ANSI N45.2-1971. The QA review of procurement documents is to ensure the requirements of various standards, codes, and regulations are met and is not to approve or concur with the item being procured. Therefore, approval or concurrence is not necessary.

STPEGS UFSAR

Question 421.52

Explain the significance of the changes at the middle of page 17.2-29 which amendment 9 revised from: "Corrective action for problems identified by DNs are documented by the cognizant plant supervisor on the DN form. The plant QA staff verifies that satisfactory correction action has taken place by reinspection or audit. Unacceptable corrective action, as determined by the plant QA staff, requires further action by the responsible supervisor and may result in suspension of the deficient activity." to "Corrective action for problems identified by DNs are determined by the cognizant plant supervisor on the DN form. the plant QA staff verifies satisfactory completion of the corrective action by reinspection or audit. Unacceptable completion of corrective action, as determined by the plant QA staff, requires further action by the responsible supervisor and may result in suspension of the deficient activity." Also, it is the staff position that the QA organization concur with the corrective action. Revise the FSAR to meet this position or provide an alternative for our evaluation.

Response

UFSAR Section 17.2.16.1, third paragraph, second sentence: Changing from "documented" to "determined" was done to emphasize that an evaluation was necessary to cause a corrective action to occur. Third sentence: changing from "has taken place" to "completion of corrective action" was done to emphasize our concern that corrective action required be completed prior to verification.

We do not agree that the QA organization concur with the corrective action. It is the Plant Manager's responsibility for safety and safe operation of the plant. Therefore, the determination of corrective action by the cognizant plant supervisor, who is responsible to the Plant Manager, does not require concurrence by QA. What is important and is very much a QA concern is that the corrective action be accomplished and completed in accordance with approved procedures, instructions, or drawings.

STPEGS UFSAR

Question 422.1

Your description in Table 1 of Section 6 of your Fire Hazards Analysis Report relative to your compliance with the Branch Technical Position does not provide adequate information on your fire protection organization for us to complete our review. Therefore, please provide the following information:

1. Describe the upper level offsite management position that has the overall responsibility for the formulation, implementation, and assessment of the effectiveness of the fire protection program.
2. Describe the offsite position(s) that has direct responsibility for formulating, implementing, and periodically assessing the effectiveness of the fire protection program for the nuclear plant, including fire drills and fire protection training.
3. Describe the onsite management position that has overall responsibility for the fire protection program. In addition, describe any further delegation of responsibilities for the fire protection program such as training, maintenance of fire protection systems, testing of fire protection systems, fire safety inspections, fire fighting procedures, and fire drills.
4. Describe the proposed composition of your station fire brigade.

Response

1. The Fire Hazards Analysis Report is prepared and assessed under the cognizance of the Manager, Engineering. The implementation of the fire protection program is controlled by the Plant General Manager.
2. The Plant General Manager is the offsite position responsible for:
 - a. Formulating, implementing and periodically assessing the effectiveness of the fire protection program, including fire drills and training conducted by the plant fire brigade and plant personnel.
 - b. Using the following NFPA Publications for guidance to develop the fire protection program:
 - No. 4 - "Organization for Fire Services"
 - No. 4A - "Organization of a Fire Department"
 - No. 6 - "Industrial Fire Loss Prevention"
 - No. 7 - "Management of Fire Emergencies"

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Response (Continued)

STPEGS UFSAR

No. 8 - "Management Responsibilities for Effects of a Fire On Operations"

No. 27 - "Private Fire Brigades"

The Plant General Manager will receive assistance in these activities from a consultant who must meet as a minimum the eligibility requirements for membership in the Society of Fire Protection Engineers.

3. The STPEGS Plant General Manager has the overall responsibility for the administration of plant operations and emergency plans which includes the fire protection and prevention program. Direct responsibility for the implementation of the plant fire protection program is delegated by the Plant General Manager to the Safety Department. In addition to the direct responsibility for the formulation, implementation and assessment of the effectiveness of the plant fire protection program, the Safety Department has the direct responsibility for:
 - a. Implementing periodic inspections to minimize the amount of combustibles in safety-related areas and determining the effectiveness of housekeeping practices. The coordinator must assure the availability and acceptable condition of all fire protection systems/equipment, emergency breathing apparatus, emergency lighting, communication equipment, fire stops, penetration seals and fire retardant coatings. The coordinator also must assure that prompt and effective actions are taken to correct conditions adverse to fire protection and to preclude their recurrence.
 - b. Providing fire fighting training for operating plant personnel and the plant fire brigade.
 - c. Inspection and testing of plant fire protection systems and equipment in accordance with approved plant procedures and evaluating test results to determine the acceptability of systems and equipment tested.
 - d. Planning and establishing training objectives for all fire drills and evaluating drills to determine if training objectives have been met.
 - e. Reviewing and evaluating proposed work activities to identify potential fire hazards.
 - f. Implementing a program for indoctrination of all plant contractor personnel in appropriate fire protection procedures.
 - g. Instructing personnel on the proper handling of accidental events such as leaks or spills of flammable materials.

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Response (Continued)

- h. Preparing plant fire protection procedures.
 - i. Insuring proper maintenance of plant fire protection systems and equipment.
4. There will be one fire brigade per shift. Each brigade will, as a minimum, consist of members of the Plant Operations shift crew serving as Fire Brigade leaders, and as members.

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