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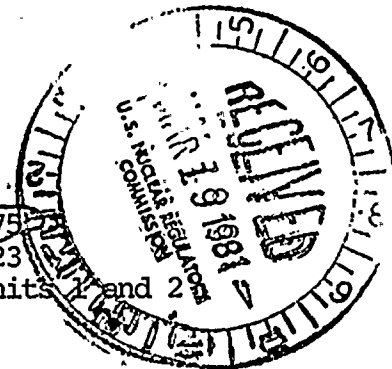
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U. S. Nuclear Regulation Commission
Washington, DC 20555

Re: Docket No. 50-275
Docket No. 50-323
Diablo Canyon Units 1 and 2



Subject: Diablo Canyon Quality Assurance Program

Dear Mr. Tedesco:

In reply to your letter dated March 6, 1981 we are providing the attached response addressing the quality assurance/quality control questions numbered 260.11, 260.12, 260.13, 260.14, 260.15, and 260.16. The remaining items concerning the Diablo Canyon Q-list will be forwarded to you in the near future.

Kindly acknowledge receipt of the above material on the enclosed copy of this letter and return it to me in the enclosed addressed envelope.

Very truly yours,

Philip A. Crane

Attachment

CC w/attachment: Service List

A 8108200 524

ATTACHMENT

QUESTION:

260.11

The August 1973 version of Regulatory Guide 1.58 was referenced in our item 260.1(i) and, therefore, in your response to this letter. Revision 1 of Regulatory Guide 1.58 was issued in September, 1980. Therefore, revise the commitment from Revision 0 to Revision 1 of this Regulatory Guide or provide an alternative for our evaluation. You will note that the new regulatory positions of this guide are applicable to operating plants and plants under construction.

RESPONSE:

We will comply with Regulatory Guide 1.58 Revision 1 and ANSI N45.2.6 - 78 as applicable to non-destructive testing and quality control inspection personnel. Our plant quality control inspectors and personnel performing leak rate testing, including that required by 10 CFR 50 appendix J, however, will not have the three levels of qualification described in the ANSI standard. As specified in the NRC interpretation of Regulatory Guide 1.58 issued April 1, 1977, personnel performing inspection, examination, and testing functions associated with normal operations of the plant such as surveillance testing, maintenance, and certain technical reviews normally assigned to the plant staff will be qualified to ANSI N18.1 1971.

QUESTION:

260.12

The response to 260.4 did not respond to 260.4h, "Quality Control under the Manager, Nuclear Projects." Therefore, describe the responsibilities of the quality control organization under the Manager, Nuclear Projects as they impact on the QA program for Diablo Canyon during the operations phase. Also indicate the number of supervisory and technical personnel in this quality control organization. Also update the response to item 260.4f.

RESPONSE:

The Quality Control Specialist under the Manager, Nuclear Projects, reports to the Senior Administrative Engineer. The QC Specialist is responsible for the development and implementation of the Nuclear Projects Quality Control Program. He assists department supervisors in the development and implementation of departmental procedures, and provides training in QC and departmental procedures to Nuclear Project personnel. He performs audits of the QC program within Nuclear Projects

department, reports on its effectiveness and implementation and recommends appropriate corrective actions. He is responsible for the overall records management for the department and serves as principle liaison with the Quality Assurance Department, as well as other Company departments and outside agencies in matters relating to Quality Control for the Nuclear Projects Department. The above description applies both to preoperational and operational activities.

The Quality Control Engineer under the Manager, Nuclear Plant Operations reports to the Senior Nuclear Generation Engineer. The QC Engineer is responsible for the development and implementation of the Nuclear Plant Operations Quality Control Program in the General Office. He assists department supervisors in the development and implementation of departmental procedures, and provides training in QC and departmental procedures to Nuclear Plant Operations personnel. He performs internal audits of the QC Program, reports on its effectiveness and implementation and recommends appropriate corrective actions. He serves as principle liaison with the Quality Assurance Department, as well as other Company departments in matters relating to Quality Control for the Nuclear Plant Operations Department in the General Office.

QUESTION:

260.13 Clarify that the "audits by the Quality Assurance Department to determine the overall effectiveness of the quality assurance program" (per Section 17.2.18 of the FSAR) include audits at least annually of each PGandE quality control organization as listed in item 260.4

RESPONSE:

Quality Control (QC) does not exist as a separate organization (as opposed to Quality Assurance) but is a part of each department associated with the nuclear project. QC is, therefore, included in any audit conducted by the Quality Assurance Department to assure conformance to the various regulations and standards.

Approximately one major audit per month is conducted covering some aspect of the quality program. These audits are referred to as Program Audits. When a Program Audit is conducted, each department involved with the aspect of the QA program being audited is examined. An integral part of the quality program in each department is the role of the quality control organization. Therefore, each quality control organization is audited approximately once per month to determine the effectiveness of some aspect of the QA program.

QUESTION:

260.14 The response to 260.8 indicates that the Materials Department, the Engineering Services Department, and the Plant Staff can

place purchase orders and contracts with suppliers. Normally, such actions are under a procurement organization only. Describe the controls which the PGandE Materials Manager has over purchase orders and contracts placed by the Engineering Services Department and those placed by the Plant Staff.

RESPONSE:

The Manager, Materials Department, has procedures, authorized by the President, for use by Engineering Services and the Plant Staff describing the issuance of purchase orders or contracts under certain circumstances. These purchase orders or contracts are periodically reviewed by the Materials Department for compliance with these procedures. All departments that issue procurement documents for safety-related items or services are periodically audited by the Materials Department, and by the Quality Assurance Department for compliance with quality assurance procedures.

QUESTION:

260.15

The second paragraph of Section 17.2.4 at the bottom of page 17.2-18 of the Diablo Canyon FSAR indicates that approved suppliers must be reviewed and approved by the Quality Assurance Department only "if a quality assurance program is required". It is the staff's position that each supplier of safety-related items or services must be reviewed and approved by the Quality Assurance Department. Commit to comply with this position or provide justification for not doing so for our evaluation.

RESPONSE:

Revise paragraph to read:

We are in compliance with your position. Safety-related items or services will be purchased from approved suppliers. To be considered approved a supplier must: 1) demonstrate the implementation of a satisfactory quality assurance program (All suppliers' quality assurance programs are reviewed and approved by the Quality Assurance Department.), 2) have a documented record of satisfactorily supplying quality products or services, or 3) be the original equipment supplier and certify that replacement parts are "as good or better" than the original components. (Quality Assurance Department audits to assure conformance for items 2) and 3). Certain commercial grade items may be purchased based on quality control acceptance requirements, including source verification, receiving inspection, supplier certificate of conformance, post-installation tests, or a combination of the above. (This revision will be incorporated into the next FSAR amendment.)

QUESTION:

260.16

The response to 260.10 indicates that quality control requirements are included in procedures and policies on performance qualification tests for welders. Verify that the quality control requirements are administered by a PGandE quality control organization or provide an alternate for our evaluation.

RESPONSE:

Quality Control requirements that are included in procedures and policies on performance qualification tests for welders are reviewed during procedure development by the QC organization at the Department of Engineering Research (DER) and the QC organization of the appropriate user department (either Construction or Operations). After issuance of procedures and policies, the QC organization of DER is responsible for auditing the implementation of specific procedural requirements; and the QA department is responsible for auditing both DER and the user departments for implementation of the overall control of welding activities.

