JUN 1 0 1974

Docket No. 50-220

Dennis L. Ziemann, Chief, Operating Reactors Branch #2, L

MEETING ON QA PROGRAM FOR OPERATIONS AT NINE MILE UNIT 1 WITH NIAGARA MOHAWK POWER CORPORATION

Date, Time and Place: June 13, 1974
9:30 a.m.
Room 372 E/W Towers

Regulation Attendees: S. M. Cummins
F. J. Liederbach
J. Gilray
R. B. Glasscock
D. J. Skovholt
D. L. Ziemann
C. J. DeBevec

Other Attendees: P. D. Raymond, Niagara Mohawk
R. R. Schneider, Niagara Mohawk
D. P. Dise, Niagara Mohawk
G. R. Rhode, Niagara Mohawk
C. V. Mangan, Niagara Mohawk

Purpose of Meeting: To discuss the QA Program considerations identified in the attached agenda.

/S/

Charles J. DeBevec
Operating Reactors Branch #2
Directorate of Licensing

Enclosure:
Meeting Agenda

cc w/enclosure:
See next page

MEMO

OFFICE	L:ORB #2					
SURNAME	CJDeBevec:rg					
DATE	6/10/74					

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MEETING AGENDA

I. SCOPE OF QA PROGRAM AND QA ORGANIZATION

Page 3 of the "Organization" Section of the QA Program description for NMPC's Nine Mile Point-Unit 1 excludes the formal QA organization from the activities of review and inspection relative to the quality related activities of the eight (8) organizations or groups listed on page 3, Organization Section.

Position

NMPC's QA Program description must include within its formal QA Program all quality related activities (including review and inspection) for all NMPC organizations/groups in accordance with each of the 18 criteria of 10 CFR Part 50, Appendix B. The QA Program description must demonstrate that those individuals or groups performing review, inspection, auditing or otherwise verifying that an activity has been correctly performed are independent of the individual or group responsible for performing the specific activity.

2. INSPECTION

The NMPC QA Program description states: For major repairs or modifications, inspection of parts, equipment, and components is the responsibility of the licensee's design office through the stage of delivery to Nine Mile Point-Unit 1 site. Inspection of parts, equipment, and components upon delivery to Nine Mile Point-Unit 1 is performed jointly by the licensee's design office (or his delegate) and Nine Mile Point-Unit 1 Maintenance Staff personnel, with the responsibility resting with the latter group.

Position

It is not acceptable for line organizations to perform inspections of their own work on critical safety related items. This practice presents a conflict of interest and demonstrates a lack of independence on behalf of inspectors who must be free to exercise objective judgment and possess authority and responsibility to take effective corrective action.

The "onsite" and/or "offsite" QA/QC personnel must have the assigned responsibility and authority to perform or require the performance of an independent, objective acceptance inspection on all safety related items and/or activities.

These inspections must be performed by qualified inspection personnel or outside consultants who are under the control of NMPC's QA/QC staff.

3. NMPC's QA Department must review and approve all QA/QC documents and procedures used to implement the QA Program.

4. NMPC must clearly commit to comply with applicable Regulatory Guides, the guidance contained within the "Orange Book" including the ANSI Standards or identify and justify any exceptions.

5. Audits

NMPC has not provided a description of an indepth audit program for the Nine Mile Point-Unit 1 to be conducted by either the "offsite" QA Department or the "onsite" QC Organization and Engineering QC.

Position

NMPC must describe indepth its proposed audit program. The scope of the audit program must be described including the frequency of various types of audits, the distribution of audit reports, and the analysis of audit reports reported to upper management.

6. NMPC has not described an effective overall management evaluation program for Nine Mile Point-Unit 1.

Position

NMPC must describe a management evaluation program which includes all quality related activities for Nine Mile Point-Unit 1 with a frequency/schedule not to exceed two (2) years.

7. NMPC has not provided for official communication channels between the QA Department and the QC Organizations (both "onsite" and "offsite") to assure the required sufficient, timely and frequent guidance and control.

Position

NMPC must describe official communication guidance and control channels between the QA Department and the two QC Organizations to assure sufficient, timely and frequent guidance and control of all quality related activities. The QA Department must receive and evaluate documented reports of all conditions adverse to quality.

8. The present NMPC QA Program description contains many vague statements. Examples:

   1. "The licensee's QA Department Manager informs appropriate senior management personnel regularly as to its findings."
   2. The requirement exists for the Manager-QA to indicate his acceptance of selected Engineering, Operating, and Purchasing procedures."
   3. Copies of audit reports are sent to those in charge of the QA/QC organizations, who in turn may report significant findings/problems to corporate management."
   4. "A minimum list of documents, considered to be in a controlled status, is as follows:"

Position

NMPC's QA Program description must be stated in concise and unambiguous terms.