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 CRANE, P.A. Pacific Gas & Electric Co.
 RECIP. NAME RECIPIENT AFFILIATION
 KNIGHTON, G.W. Licensing Branch 3

SUBJECT: Forwards Revision 2 to "Diablo Canyon Project QA Program,"
 in response to DG Eisenhut 821202 request.

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December 21, 1982

Mr. George W. Knighton, Chief
Licensing Branch No. 3
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Re: Docket No. 50-275, OL-DPR-76
Docket No. 50-323
Diablo Canyon Units 1 and 2
Diablo Canyon Project Quality Assurance Program

Dear Mr. Knighton:

On June 18, 1982 PGandE submitted to the NRC the Diablo Canyon Project Quality Assurance Program for use by the PGandE/Bechtel integrated Diablo Canyon Project Organization. On August 13, 1982 Revision 1 was submitted containing the additional information and clarifications requested by Mr. Darrell G. Eisenhut in his letter of August 2, 1982.

In compliance with Mr. Eisenhut's request dated December 2, 1982, we are now submitting Revision 2 which provides additional changes and clarifications as identified in the margin of the enclosure with the numeral 2.

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

Very truly yours,

Philip A. Crane, Jr.

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LAW DEPARTMENT - 77 BEALE STREET, 31ST FLOOR • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211

December 21, 1982

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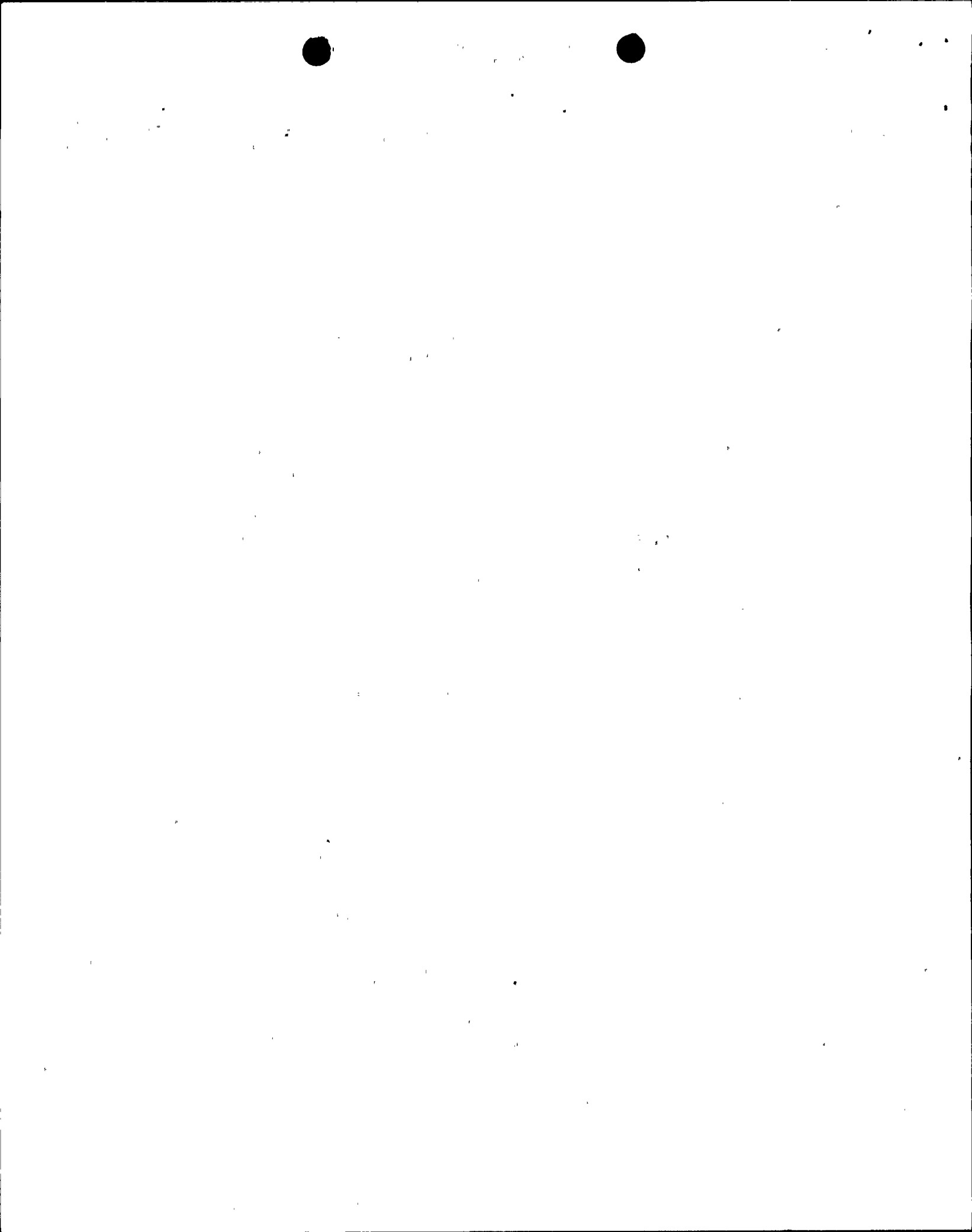
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Very truly yours,

Philip A. Crane, Jr.

Enclosure (40 copies)

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QUALITY ASSURANCE PROGRAM

BECHTEL POWER CORPORATION

DIABLO CANYON PROJECT

Introduction

Q.1

Bechtel Power Corporation has been retained to provide Project Completion Management services to Pacific Gas and Electric Co. for the Diablo Canyon Project. Bechtel provides these services subject to PG&E's overall supervision as owner. Bechtel provides managers and supervisors as appropriate to provide management services and direction to an integrated project team consisting of PG&E and Bechtel personnel. The Quality Assurance Program described herein applies to the activities of the project team, as defined in the "Scope of Responsibilities" section below. The program also describes, the quality related responsibilities of Bechtel management organizations and their relationship to the project team. The program will remain in place through completion of the integrated project team's activities or until such time as the integrated project team is disbanded.

Quality Assurance Topical Report

The Quality Assurance Program Plan for use by the Bechtel Power Corporation during Project Completion Management of the Pacific Gas and Electric Diablo Canyon Project is described in the NRC-approved Bechtel Topical Report BQ-TOP-1, Rev. 3A, Bechtel Quality Assurance Program for Nuclear Power Plants.

Scope of Responsibility

Q.1

This section describes the scope of Bechtel responsibilities for providing quality-related services in Project Completion Management on the Diablo Canyon Project. Bechtel Project Completion responsibilities consist of design engineering, procurement services, and construction completion. This Quality Assurance Program Plan applies to Bechtel and project team activities in these areas as noted below.

2 | Design engineering services provided by the Project Team under this Quality Assurance Program Plan include:

- o Management of design completion,
- o Preparation of design document and design changes,
- o Preparation of licensing submittals, and
- o Coordination of design verification activities performed by non-Bechtel entities at the request of PG&E.



- 2 | Procurement services provided by the Project Team under this Quality Assurance Program Plan include preparation of procurement documents and changes for use in subsequent procurement actions.

Q.6 2 | Procurement actions will normally be provided by PG&E. Such procurement actions are under the cognizance of the PG&E QA program as described in Section 17.2 of the Diablo Canyon FSAR, and are excluded from the coverage of the Bechtel Topical Report BQ-TOP-1. The Project Team may, at PG&E request, undertake purchasing through the Bechtel organization in accordance with requirements of this Program. The company (PG&E or Bechtel) that places the purchase order will be responsible for supplier evaluation, supplier control, supplier audits and source inspection in accordance with their respective quality assurance program.

- 2 | Construction completion management will be performed by Bechtel. Construction completion services include management support and technical guidance to PG&E Construction. PG&E Construction is part of the Project Team and construction activities are the responsibility of the Project Completion effort. All construction quality related activities are under the cognizance of the PG&E QA program, as described in Section 17.2 of the Diablo Canyon FSAR. These activities are excluded from the coverage of the Bechtel Topical Report BQ-TOP-1.

PG&E and Bechtel provided personnel to form an integrated project team, working under the direction of Bechtel's Project Completion Manager, to provide the above services. PG&E procedures may be used, amended as necessary to comply with this Quality Assurance Program description.

Where used in reference to project team activities, the term "Bechtel" shall be understood to mean: the integrated project team.

Project Unique Modifications to BQ-TOP-1, Rev. 3A

- o Introduction Page 3 - Add Regulatory Guide 1.146 "Qualifications of Quality Assurance Program Audit Personnel for Nuclear Power Plants (Rev. 0, 1978)".
- o Introduction Page 3 - Replace ANSI Standard N45.2.12 - 1974 with: Regulatory Guide 1.144 "Auditing of Quality Assurance Programs for Nuclear Power Plants (Revision 1, September 1980).
- o Introduction Pages 2 and 3 - Delete the following Regulatory Guides:
 - Regulatory Guide 1.30
 - Regulatory Guide 1.37
 - Regulatory Guide 1.39
 - Regulatory Guide 1.58
 - Regulatory Guide 1.94
 - Regulatory Guide 1.116



- o Introduction Page 5 - Add to the list of terms and definitions as follows:

21. Project Guidance: Providing advice or counsel on matters concerned with project functions or activities. This may include establishing general requirements or policies, but not specific procedures or instructions.

Q.5

- o Section 1 ORGANIZATION Subsection 1.6 Page 13 - Add as first paragraph to Subsection 1.6 the Attachment 1. Delete "the Field Construction Manager" and "Project Startup Engineer" from the existing paragraph. Add the following to the existing paragraph: The Project Team members are responsible for the quality of the work performed by their respective groups.

- o Section 1 ORGANIZATION Subsection 1.6.1 Page 13 - Revise the first paragraph of subsection 1.6.1 to read as follows:

Q.4

Q.5

The project quality assurance program is directed and controlled by the Project Quality Assurance Engineer (PQAE). The PQAE is responsible to assure that quality assurance actions as listed below are performed throughout the project organization and are accomplished in accordance with the requirements of the project. Project Quality Assurance responsibilities include the following:

Revise item (4) of Subsection 1.6.1 to read as follows:

4) Review supplier and subcontractor quality assurance program requirements in procurement documents.

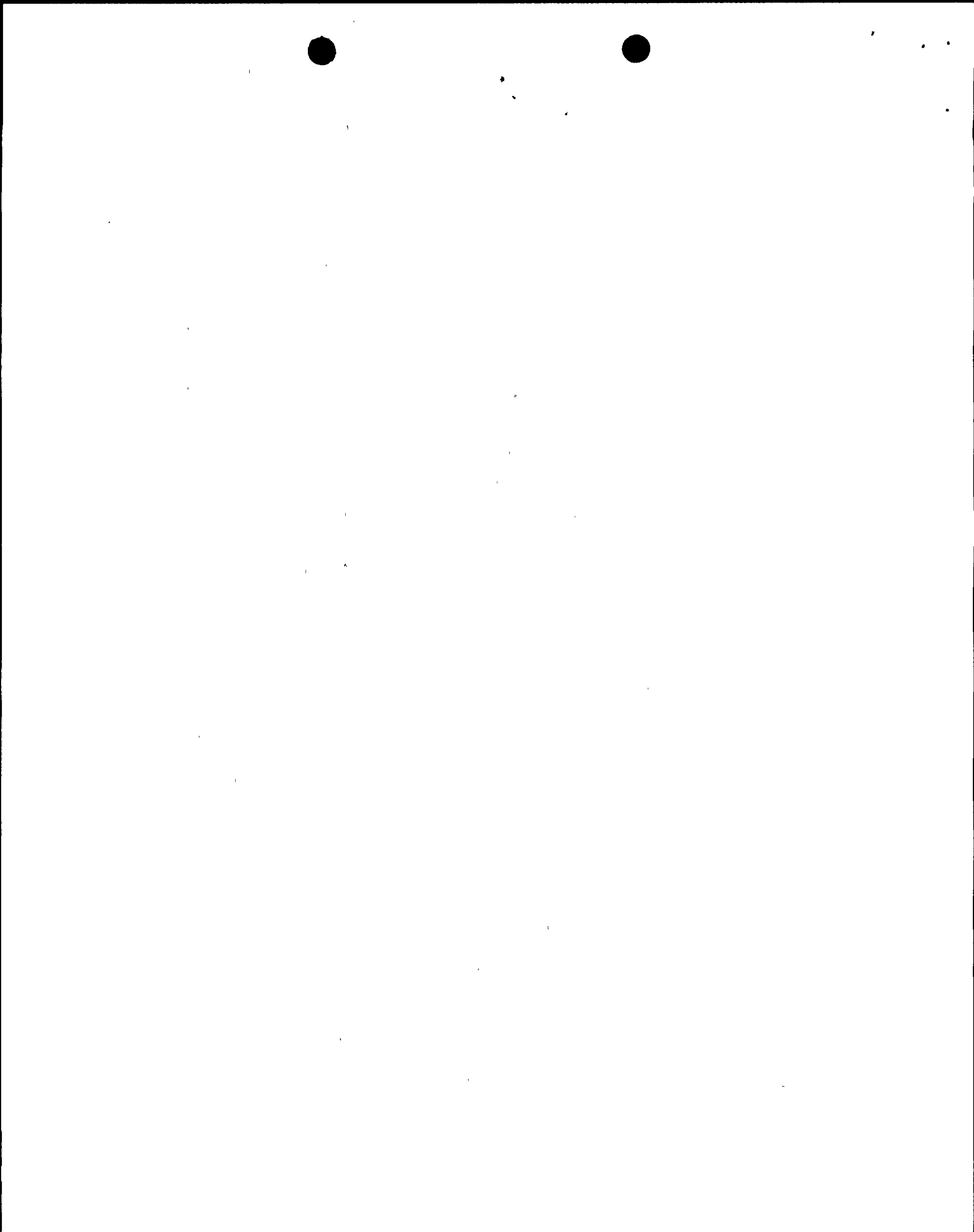
Revise items (2) and (13) of Subsection 1.6.1 to read as follows:

2) Coordinate project quality-related activities of Engineering and Procurement.

13) Review prior to use, Procurement Inspection plans for clarity and the existence of the information described in Section 7. In addition, evaluate the adequacy of selected plans by performing an in-depth review of:

- a. Accuracy of translation of drawing and specification requirements
- b. Basis of determining inspection level and sequence
- c. Adequacy of inspection method

This review provides assurance that the total quality program requirements inclusions are complete. Reviews of plans can be performed on a generic basis. In that case, PQAE only verifies that the review has been performed.



- Section 1 ORGANIZATION Subsection 1.6.2 Page 15 - Revise items (2), (5) and (8) and add item (9) per Attachment 2.
- Section 1 ORGANIZATION Page 16 - Delete Subsection 1.6.3.
- Section 1 ORGANIZATION Subsection 1.6.4 Page 17 - Replace Subsection 1.6.4 with Attachment 3.
- Section 2 QUALITY ASSURANCE PROGRAM Subsection 2.2 Page 20 - Delete "or by construction Quality Control for on-site subcontractors" from the third complete paragraph of page 20. Delete the fourth paragraph of page 20.
- Section 2 QUALITY ASSURANCE PROGRAM Subsection 2.3 Page 21 - Delete subparagraph (3).
- Section 2 QUALITY ASSURANCE PROGRAM Subsection 2.5 Page 23 - Delete subparagraph (1) and (2). In subparagraph (3), change ANSI N45.2.12 to ANSI N45.2.23.
- Section 2 QUALITY ASSURANCE PROGRAM Subsection 2.6 Page 24 - Delete " and construction activities" from item (3) of the first paragraph.
- Section 2 QUALITY ASSURANCE PROGRAM Subsection 2.9 Page 26 - Revise the first sentence to read as follows:

The quality program described in this report covers design and procurement activities.

- Section 3 DESIGN CONTROL Page 29 - Delete "or Bechtel construction" from the last sentence on page 29.
- Section 3 DESIGN CONTROL Page 30 - Replace first, second and third paragraph of 30 with the following:

"In the case of proposed changes to the original design initiated at the construction site, acceptance of the design change by project engineering is provided in those instances where the PG&E QA program requires such acceptance."

Revise the fourth paragraph to read as follows:

Suppliers are not allowed to change Bechtel design requirements of Bechtel-reviewed supplier design documents without obtaining approval by Bechtel Project Engineering.

- Section 4 PROCUREMENT DOCUMENT CONTROL Page 31 - Delete "whether performed by home office or field procurement groups" from the first paragraph of page 31.



- Section 4 PROCUREMENT DOCUMENT CONTROL Page 32 - Delete "or Bechtel Construction Quality Control" from the first paragraph of page 32. Delete "or, for jobsite contractors and subcontractors, by Construction Quality Control" from item (5) of the third paragraph of page 32.
- Section 4 PROCUREMENT DOCUMENT CONTROL Page 33 - Delete the contents of page 33.
- Section 5 INSTRUCTIONS PROCEDURES AND DRAWINGS Page 34 - Delete the fifth, sixth, and seventh paragraphs of page 34.
- Section 6 DOCUMENT CONTROL Page 35 - Revise the first, second, and third paragraphs to read as follows:

The program documents identified in Section 2 provide means for document control. These include procedures providing Engineering and Procurement Inspection controls for the review, approval, and release of documents and changes thereto.

Documents pertaining to quality-related items, as identified in this paragraph, are required to be controlled. The documents listed in Table I are on controlled distribution. Instructions, procedures, specifications, drawings, procurement document, design calculations, design criteria, and safety analysis reports are identified by control registers or index lists. Supplier deviation reports, corrective action reports, documentary evidence of design reviews, memoranda, and correspondence are identified by logs which provide for traceability of closeout action.

A document control center for the project is set up in the Project Engineering office. Controlled documents are released, controlled, and distributed through this center.

Delete "or proposed by Field Engineering" from the sixth paragraph of page 35.

- Section 6 DOCUMENT CONTROL Page 36 - Delete the first complete paragraph of page 36. Delete subitem (5) of the third paragraph of page 36.

Delete the last sentence of the fourth paragraph of page 36.

Revise the last paragraph of page 36 to read as follows:

Control of documents in the engineering offices is regularly audited by Quality Assurance personnel.

- Section 7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES Page 40 - Delete Subparagraph 7.3.



- o Section 8 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS Page 43 - Revise the second paragraph of 43 to read as follows:

Parts, components, subassemblies and equipment, and partially fabricated items may be identified by stenciled or etched markings, strip marking, imprinted tape, color coding, and tags. Large quantities of small items, unless specifically required by code or standard, may be identified as to heat, batch, lot, or specification by applying markings to bags, bins, tanks, or other suitable containers. Identification of assembled items requiring traceability may be transferred to inspection records or as-built documents if desired and is required if markings are hidden or subject to obliteration during fabrication.

Delete the third paragraph of page 43.

- o Section 9 CONTROL OF SPECIAL PROCESSES Page 44 - Delete the second, third, and fourth paragraphs of page 44.
- o Section 10 INSPECTION Pages 45 and 46 - Delete Section 10.
- o Section 11 TEST CONTROL Page 47 - Delete the second and third paragraphs of page 47.
- o Section 12 CONTROL OF MEASURING AND TEST EQUIPMENT Page 48 - Delete Section 12.
- o Section 13 HANDLING, STORAGE, AND SHIPPING Page 49 - Delete the second, fourth, and fifth paragraphs of page 49.
- o Section 14 INSPECTION, TEST, AND OPERATING STATUS Page 50 - Delete Section 14.
- o Section 15 NONCONFORMING ITEMS Pages 51 and 52 - Replace the second and third paragraphs of Section 15 on pages 51 and 52 with the following.:

Project Engineering shall review and approve reports of nonconformances referred to Project Engineering in those instances that the PG&E QA program requires such referral.

- o Section 15 NONCONFORMING ITEMS Page 52 - Revise the first complete paragraph of page 52 to read as follows:

Nonconforming items discovered by suppliers or subcontractors at final inspection which cannot be corrected by rework or completion of originally prescribed processing are required to be identified, tagged, and/or segregated. Discrepancies in work not yet submitted for final inspection which can be corrected by rework or completion or work processes are not considered to be nonconformances. Bechtel Procurement Supplier Quality Representatives are instructed to withhold release for shipment until all nonconformances have been resolved or an interim disposition is approved by Project Engineering.

Revision 2, Page 6



- o Section 15 NONCONFORMING ITEMS Page 52 - Delete the last paragraph of page 52.
- o Section 16 CORRECTIVE ACTION Page 53 - Add the following to Section 16:
For situations which may need corrective action involving site construction operations, the PG&E QA program corrective action system will be followed.
- o Section 17 QUALITY ASSURANCE RECORDS Page 54 - Replace the second paragraph with the following:
The PG&E "Records Management System" will be used for retention of QA records.
- o Section 17 QUALITY ASSURANCE RECORDS Page 54 - Delete "...Construction office files..." from the third paragraph of page 54.
Delete "...construction site..." from the fourth paragraph of page 54.
Delete the fifth and sixth paragraphs of page 54.
- o Section 18 AUDITS Page 55 - Delete subitem (2)
Delete "...Construction and Quality Control..." from subitem (4).
- o Change "Project Procurement Manager" to "Project Materials Coordinator" throughout.

Replace
Table 1
with
Attachment 4

"Diablo Canyon Project Quality Program Documents" Attachment 4

Q.2 | Replace
Fig. 9
with
Attachment 5

Diablo Canyon Project Team Organization Attachment 5

Q.2 | Replace
Fig. 10
with
Attachment 6

Diablo Canyon Project Engineering Organization Attachment 6



Q.8 |

Delete
Fig. 11

Replace Fig. 13 with Attachment 8

Appendix A Bechtel Position on QA NRC Regulatory Guides and ANSI Standards:

- Delete the first, second, fourth, fifth, eighth and ninth paragraphs of page A-1. Delete pages A-2, A-3, A-6 through A-13, A-17, A-18 and A-19.
- Replace ANSI N5.2.12-1974, Draft 3, Rev. 4, February 22, 1974 with Regulatory Guide 1.144, Rev. 1, September 1980: replace pages A-22 and A-23 with Attachment 7.



ATTACHMENT 1

- 2 | 1.6 The Project Completion Manager (Fig. 15) is the senior project representative assigned to the Diablo Canyon Project (Units 1 & 2). The Project Completion Manager reports to the Manager, Division Project Operations and receives project direction from the PG&E Executive Vice President for Facilities and Electric Resources Development. He receives technical and administrative direction from the Bechtel Division Project Operations Manager. The Project Completion Manager is responsible for providing overall project direction to assure consistent and coordinated application of Bechtel policies and skills for the benefit of the project. The Project Completion Manager's Management Team includes other managers to coordinate activities in engineering, licensing, and the quality program, and to provide guidance to other project managerial personnel.



ATTACHMENT 2

- 2) Assure that drawings, specifications, procedures, and instructions produced conform to project requirements, owner or Bechtel standards, applicable industry standards, regulatory agency requirements, and the design bases as defined in Safety Analysis Reports.
- 5) Review and approve the design changes and approve the disposition of nonconformances referred to project engineering in those instances that the PG&E QA program requires such referral.
- 8) Provide design information, criteria, and guidelines for design work which is to be completed by the responsible construction organization.
- 9) Handle and process open items generated by the Independent Design Verification Program (IDVP), including interface with IDVP consultants.



ATTACHMENT 3

1.6.4 Project Procurement

The PG&E Manager Materials is responsible for PG&E Procurement activities performed for the Diablo Canyon Project.

The Manager, Division Procurement, is responsible for Procurement activities performed by Bechtel for the Diablo Canyon Project when so requested by PG&E.

The Project Materials Coordinator provides project direction for assigned procurement activities at the project level and project coordination to Project Supplier Quality Supervisors. He receives Technical and Administrative direction from the PG&E Manager Materials and project direction from the Project Manager.

Project Supplier Quality Supervisors report to the Division Supplier Quality Manager for technical and administrative direction. The functions of the Project Supplier Quality Supervisor relative to Bechtel procurement are:

- 1) Coordinate project procurement surveillance inspection activities with project engineering and Procurement Supplier Quality.
- 2) Comment on technical specification prior to issuance for bids.
- 3) Initiate supplier surveys, Supplier Quality Assignments, and coordinate supplier audits with Procurement Supplier Quality.
- 4) Review and accept procurement surveillance inspection reports.
- 5) Give project direction on project Supplier Quality assignments to the Bechtel Supplier Quality Representative.



ATTACHMENT 4
 DIABLO CANYON PROJECT
 QUALITY PROGRAM DOCUMENTS

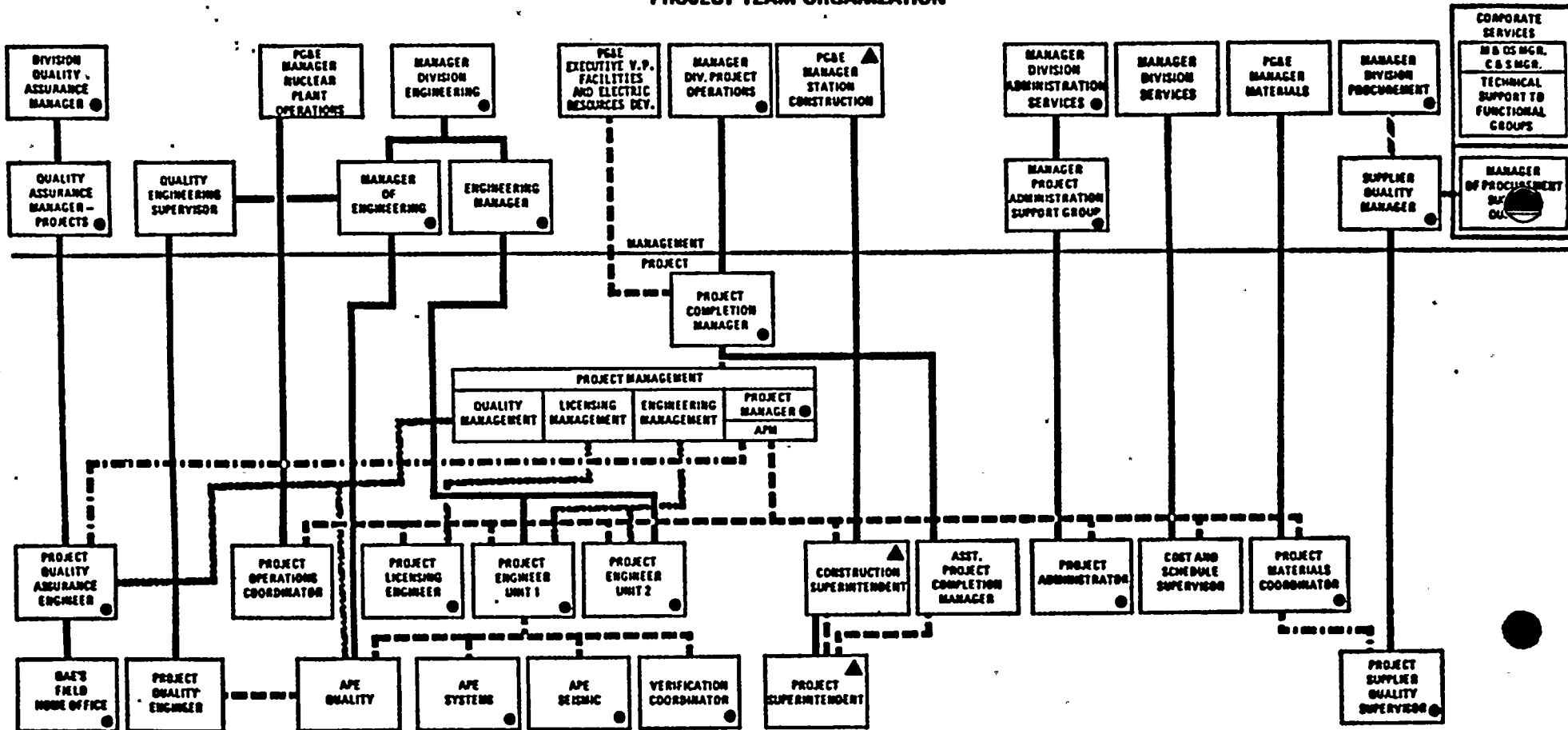
DOCUMENTS	ORIGINATING AUTHORITY	REVIEW FOR QA POLICY AND PROGRAM REQUIREMENTS	AUTHORIZING APPROVAL	CONTENTS
DIABLO CANYON NUCLEAR QUALITY ASSURANCE MANUAL (NQAM)	PROJECT QA ENGINEER	SFPD QA MANAGER (BECHTEL)	SFPD QA MANAGER (BECHTEL) PROJECT MANAGER	QUALITY PROGRAM POLICY BASED ON DIVISION POLICY AS CONTAINED IN SFPD STANDARD NQAM
PG&E ENGINEERING MANUAL	VICE PRESIDENT, ENGINEERING (PG&E)	PROJECT QA ENGINEER	VICE PRESIDENT, ENGINEERING (PG&E) PROJ. COMP. MANAGER	PROCEDURES FOR CONDUCTING PROJECT ENGINEERING, ACTIVITIES
PROJECT ENGINEERING INSTRUCTIONS	PROJECT ENGINEER	PROJECT QA ENGINEER	PROJECT ENGINEER	SUPPLEMENTS TO PG&E ENGINEERING MANUAL, WHERE NECESSARY
RECORDS MANAGEMENT SYSTEM HANDBOOK (PG&E)	SUPERVISOR, RECORDS MANAGEMENT (PG&E)	PROJECT QA ENGINEER	MANAGER QUALITY ASSURANCE DEPT. (PG&E RECORDS MANAGEMENT)	PROCEDURES FOR RECORDS MANAGEMENT SYSTEM
PROCUREMENT MANUALS (QUALITY PROGRAM RELATED)	PROCUREMENT	MANAGER OF QA-TPO	COGNIZANT PROCUREMENT MANAGERS	PROCEDURES FOR PROCUREMENT NECESSARY TO FOLLOW TPO QUALITY POLICY.
PROCUREMENT SUPPLIER QUALITY MANUAL	MANAGER PROCUREMENT SUPPLIER QUALITY	MANAGER OF QA-TPO	MANAGER PROCUREMENT SUPPLIER QUALITY	PROCUREMENT SUPPLIER QUALITY PROCEDURES
DIVISION QA PROCEDURES	DIVISION QA MANAGER	NA	DIVISION QA MANAGER	PROCEDURES FOR CONDUCTING DIVISION QA ACTIVITIES
M&QS PROCEDURE & POLICY GUIDES (QUALITY PROGRAM RELATED)	MANAGER M&QS	MANAGER OF QA-TPO	MANAGER M&QS	POLICIES AND PROCEDURES FOR PERFORMING M&QS FUNCTIONS



ATTACHMENT 5

DIABLO CANYON

PROJECT TEAM ORGANIZATION



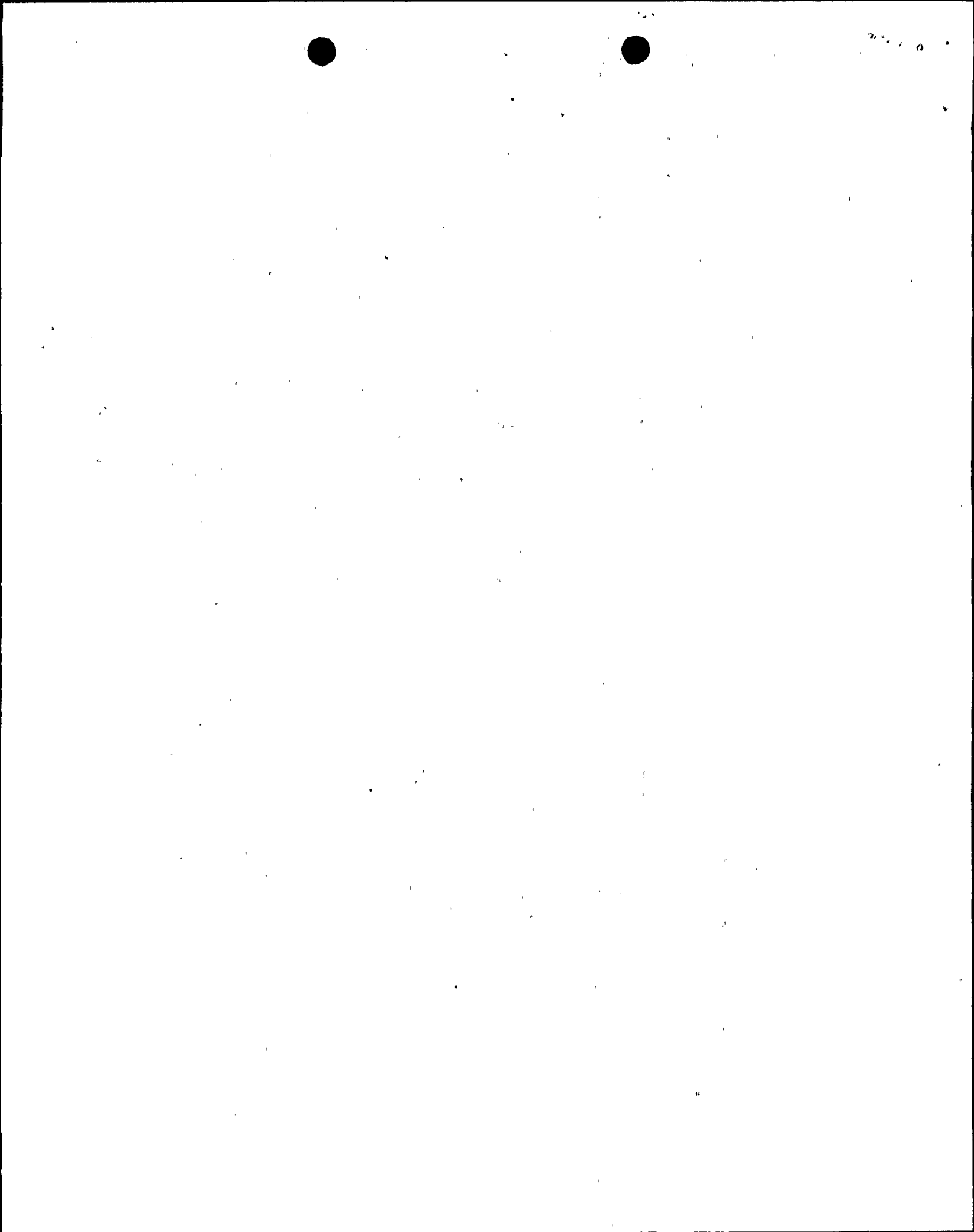
LEGEND

- TECHNICAL & ADMINISTRATIVE DIRECTION
- - - PROJECT DIRECTION
- · · · · PROJECT COORDINATION
- · · · · TECHNICAL DIRECTION
- /// ADMINISTRATIVE DIRECTION ONLY
- · · · · PROJECT GUIDANCE

THIS CHART IS INTENDED TO REFLECT REPORTING RELATIONSHIPS AND NOT NECESSARILY LEVELS OF RESPONSIBILITY, SENIORITY OF POSITIONS, OR WORKING RELATIONSHIPS.

NOTE
 ● AN EXCEPTION TO THE ABOVE LEGEND IS THAT ADMINISTRATIVE DIRECTION IS ALWAYS PROVIDED BY THE PARENT ORGANIZATION (PCBE OR DECTELL).

- INDICATES ORGANIZATIONAL ELEMENTS WITH RESPONSIBILITIES UNDER THE PROJECT QA PROGRAM
- ▲ INDICATES ORGANIZATIONAL ELEMENTS COVERED BY THE PG & E QA PROGRAM





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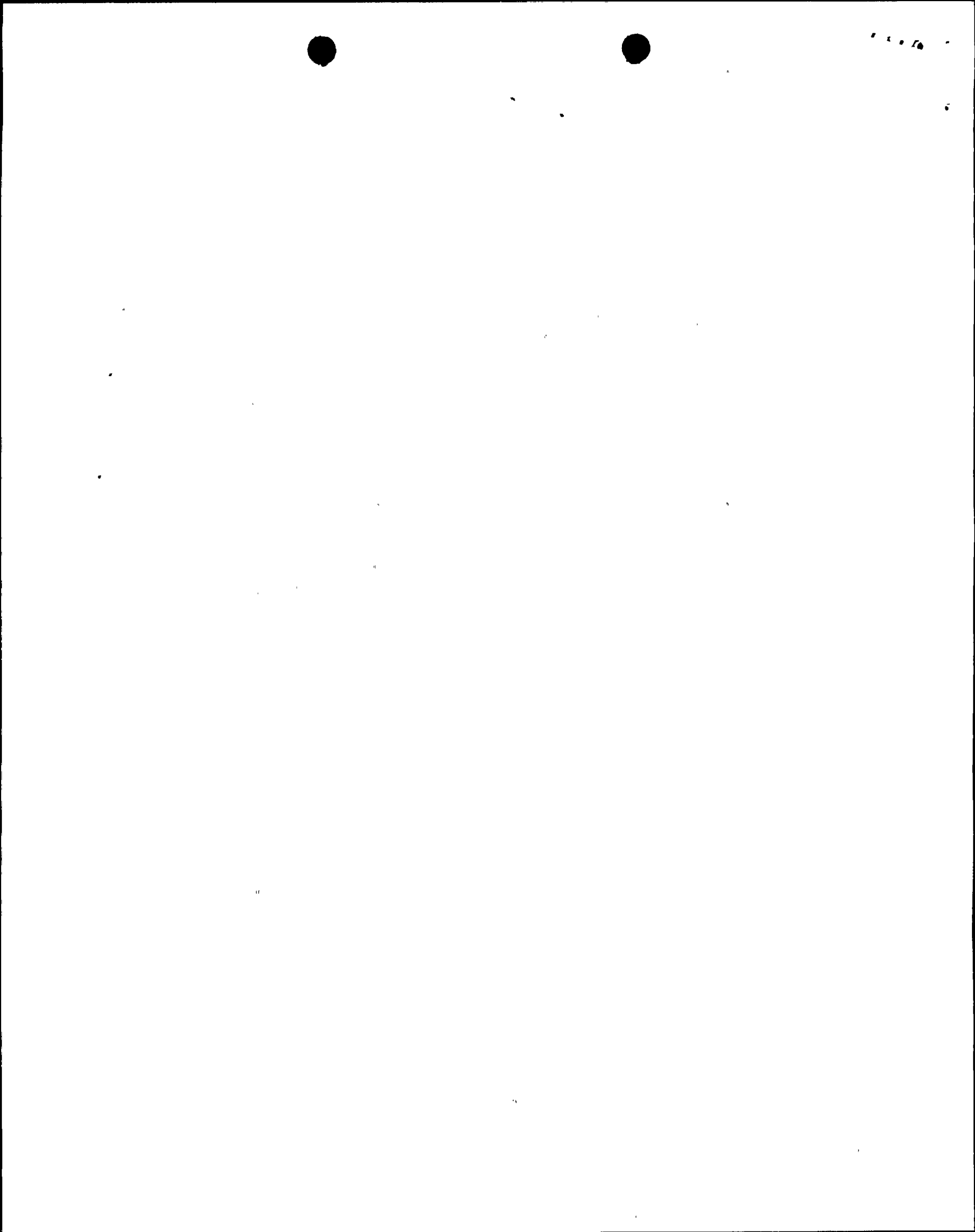
ATTACHMENT 7

Regulatory Guide 1.144 (ANSI N45.2.12-1977, Auditing of Quality Assurance Programs of Nuclear Power Plants)

The requirements of the referenced standards as modified and interpreted by the regulatory position will be applied to the Bechtel quality program for safety-related items except as modified or interpreted below:

1) Reference: Standard Sections 4.3.2.4 and 4.5.1 (Investigation). As an equivalent alternative to the requirements for the audited organization to investigate any adverse audit finding to determine and schedule appropriate corrective action, Bechtel's auditing organization may determine the investigatory action and corrective action including action to prevent recurrence pertinent to adverse audit finding. These actions are agreed to by the audited organization. Further, in Section 4.5.1, as equivalent alternative to the 30-day response time, a response time appropriate to the finding is agreed to by the audited and auditing organizations.

2) Reference: Regulatory Section C.7, Standard Section 5.2 (Audit Records). Audit records shall include documents as defined in the standard and other documents if necessary to support audit findings.



QUALITY PROGRAM DOCUMENTS

