

ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION

SUSQUEHANNA STEAM ELECTRIC STATION

DOCKET NOS. 50-387 AND 50-388

7907110711



12

421.0

QUALITY ASSURANCE OPERATIONS

421.25
(17.2.1)

Paragraph 17.2.1.1.4.1.1.1 on page 17.2-6 states the Quality Supervisor is assisted by Quality Specialists and engineers without identifying their reporting relationship on the appropriate organizational charts in Section 17.2 of the FSAR. The above paragraph implies there is more than one individual performing in these positions which appears to contradict the numbers specified in Figure 13.1-7. Please correct this discrepancy.

421.26 (RSP)
(17.2.2)

The response to Q421.14 is not totally acceptable. Provide a description of how management (above or outside the QA organization) regularly assesses the scope, status, adequacy, and compliance of the QA program to 10 CFR 50 Appendix B. These measures should include:

- (1) Frequent review of program status through reports, meetings and/or audits.
- (2) Performance of an annual preplanned and documented assessment. Corrective action is identified and tracked.

Modify your QA program accordingly.

421.27 (RSP)
(17.2.2)

The response to Q421.15 is not acceptable. The NRC has not endorsed N45.2.12 Draft 4, Revision 3 and therefore you should commit to comply with the provisions of ANSI N45.2.12 Draft 3, Revision 4, 2/22/74 or ANSI N45.2.12 Draft 4, Revision 2, 1/1/76 as supplemented by regulatory position C.4. of Regulatory Guide 1.33, Revision 2 (2/78). Any exceptions and/or alternatives to these controls should be described in sufficient supporting detail to allow for NRC evaluation and acceptance. Modify your QA program accordingly.

421.28 (RSP)
(17.2.2)

The response to Q421.16 requires clarification concerning the qualification requirements for individuals performing certain QA functions during the operational phase of your plant. Our position is as follows:

- (1) The individuals performing inspection, examination and testing functions associated with normal operations of the plant, such as surveillance testing, routine maintenance and certain technical reviews normally assigned to the onsite operation organization shall be qualified to ANSI N18.1-1971.

- (2) Personnel whose qualifications are not required to meet those specified in ANSI N18.1 and who are performing inspection, examination and testing activities during the operational phase of the plant shall be qualified to ANSI N45.2.6-1973 except that the QA experience cited for Levels I, II, and III shall be interpreted to mean actual experience in carrying out the types of inspection, examination and testing activity being performed.

This position is consistent with ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," Section 3.4.2. Modify your QA program accordingly to address this staff position.

- 421.29 (RSP)
(17.2.2) The response to Q421.20 is not acceptable. Describe provisions to notify the NRC of changes (1) to the accepted SAR QA program description prior to implementation, and (2) to organizational elements within 30 days after announcement. (Note - editorial changes or personnel reassignments of a non-substantive nature do not require NRC notification.) Modify your QA program accordingly.
- 421.30
(17.2.3) Describe measures to assure that responsible plant personnel are made aware of design changes/modifications which may affect the performance of their duties.
- 421.31
(17.2.6) Clarify whether the Manager-Nuclear Quality Assurance reviews and concurs with changes to the onsite QA program.
- 421.32
(17.2.6) Describe provisions which assure that maintenance, modification and inspection procedures are reviewed by qualified personnel knowledgeable in QA disciplines (normally the QA organization) to determine that the necessary inspection requirements, methods, and acceptance criteria have been identified.
- 421.33
(17.2.6) Describe measures to assure that the QA organization or an individual qualified in quality assurance but other than the person who generated the document, reviews and concurs with the documents and changes thereto with regards to QA-related aspects to assure technical adequacy and inclusion of appropriate quality requirements prior to implementation. Such documents as a minimum include: design, procurement, as built drawings, QA/QC manuals, SAR, nonconformance reports and instructions and procedures for inspection and testing.
- 421.34
(17.2.7) Describe the organizational responsibilities for the control of purchased material, equipment, and services including the interface responsibilities of the QA organization relative to procurement.
- 421.35
(17.2.9) Describe the criteria for determining those processes that are controlled as special processes. As complete a listing as possible of special processes, which are generally those processes where direct inspection is impossible or disadvantageous, should be

The response to Q421.20 is not acceptable. Describe provisions to notify the NRC of changes (1) to the accepted SAR QA program description prior to implementation, and (2) to organizational elements within 30 days after announcement. (Note - editorial changes or personnel reassignments of a non-substantive nature do not require NRC notification.) Modify your QA program accordingly.

provided. Some examples are welding, heat treating, NDT, and chemical cleaning.

- 421.36
(17.2.10) Describe measures which assure that program procedures provide criteria for determining the accuracy requirements of inspection equipment and criteria for determining when inspections and tests are required.
- 421.37
(17.2.10) Describe provisions to assure that inspection procedures, instructions, or checklists provide, as required, for the following:
- (1) Identification of required procedures, drawings and specifications and revisions.
 - (2) Specifying necessary measuring and test equipment including accuracy requirements.
- 421.38
(17.2.10) Describe measures which assure that inspection results are documented, evaluated and their acceptability determined by a responsible individual or group.
- 421.39
(17.2.12) Describe the organizational responsibilities for establishing, implementing, and assuring effectiveness of the calibration program.
- 421.40
(17.2.13) Describe the provisions established for the storage of chemical, reagents (including control of shelf life), lubricants, and other consumable materials.
- 421.41 The responses to the 421 series of questions appear to be separated from Section 17.2 of the FSAR. Incorporate or reference all responses to these QA questions in Section 17.2 of the FSAR. It is further requested that a statement be provided whereby the responses to Q421.1 and Q421.2 supersede previous submittals relative to QA for fire protection.