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SUBJECT: Provides description of proposed change to plant QA organization & to qualification requirements for Manager - Nuclear Assessment Svcs.

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U.S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED ORGANIZATIONAL CHANGE AND REVISED
QUALIFICATIONS FOR MANAGER- NUCLEAR ASSESSMENT
SERVICES**
PLA-4662

FILE R41-2

**Docket Nos. 50-387
and 50-388**

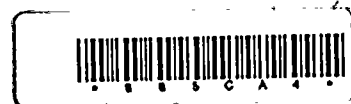
The purpose of this letter is to describe a proposed change to the PP&L Quality Assurance organization and to the qualification requirements for the Manager - Nuclear Assessment Services.

Background

The NRC review of the PP&L Quality Assurance and Independent Safety Assessment functions is contained in the NRC Safety Evaluation Report (SER) for the Susquehanna Steam Electric Station (NUREG-0776), and Supplement 1 to the SER. The program highlighted in these references included two separate functional groups for Quality Assurance and Independent Safety Assessment; both reporting directly to the Senior Vice President - Generation/Chief Nuclear Officer (previously Senior Vice President - Nuclear).

Subsequent to the NRC review and approval, PP&L implemented organizational changes to include the Independent Safety Assessment function, the Employee Concerns function, and the Operational Experience Services (i.e., deficiency management) function into the same functional unit as the Quality Assurance function. The resulting organization was renamed "Nuclear Assessment Services."

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Subsequent to the issuance of NUREG-0776, the requirements for the Quality Assurance Manager changed. PP&L recently determined that the qualification requirements for the Quality Assurance Manager, as delineated in the Final Safety Analysis Report, were not satisfied. This was documented in a PP&L Condition Report.

Proposed Change

This letter describes a proposed change to the PP&L Quality Assurance organization and to the qualification requirements for the Manager - Nuclear Assessment Services. As discussed in a teleconference with the NRC Staff, the organizational changes have been implemented, but will be considered temporary pending agreement from the Staff. Also, pending this agreement, PP&L will adhere to the current qualification requirements for the position of Manager - Nuclear Assessment Services. Our Acting Manager - Nuclear Assessment Services meets these qualification requirements.

The proposed Nuclear Assessment Services Organization is shown in Figure 1. In this new organization, the Senior Vice President - Generation/Chief Nuclear Officer would maintain overall authority and responsibility for the Operational Quality Assurance Program. The Manager - Nuclear Assessment Services would maintain the responsibility for directing and coordinating the maintenance of the Operational Quality Assurance Program and performing Quality Assurance activities as required by the Quality Assurance Program. In addition, the Manager - Nuclear Assessment Services would be responsible for the Assessment Process Services function and for management of the Employee Concerns function. The Independent Safety Assessment Group would report to the Senior Vice President - Generation/Chief Nuclear Officer. The Operating Experiences Services Group would be incorporated into the organization reporting to the General Manager - Susquehanna SES.

Basis for Proposed Change

The Manager - Nuclear Assessment Services maintains responsibility for activities related to the Operational Quality Assurance Program. Although not within the scope of the Operational Quality Assurance Program per se, the Employee Concerns function and the Assessment Process Services function are functions which assess and evaluate the quality of activities and documents supporting the safe operation of Susquehanna. The Employee Concerns program manages safety concerns raised by individuals who are evaluating actions or conditions related to the design, maintenance, or operation of Susquehanna. The Assessment Process Services function performs various assessments of the Nuclear Department and provides guidance and resources to other Nuclear Department groups for the conduct of self-assessments. With these two functions reporting to the Manager - Nuclear Assessment Services, the quality and safety focus of the Nuclear Department is strengthened. The scope of control for the Manager - Nuclear Assessment

Services has not increased substantially, and now includes other quality/safety assessment functions which strengthen the quality/safety focus of the Nuclear Department.

The qualification requirements for the Manager - Nuclear Quality Assurance that were approved in NUREG-0776 were based on ANSI N18.1-1971. ANSI N18.1-1971 contains no specific requirements for the Quality Assurance Manager, but does include requirements for Technical Managers. These requirements include eight years of experience in a responsible position and one year nuclear power plant experience. NUREG-0776 approval was based on a PP&L commitment to assure that the Manager - Nuclear Quality Assurance had 10 years of experience with at least 5 years of active participation in nuclear-related, quality assurance functions. Subsequent to NRC review and approval in NUREG-0776, the NRC Standard Review Plan (Section 17.1) has endorsed the use of ANSI/ANS-3.1-1978, Section 4.4.5 for the Quality Assurance Manager qualifications. ANSI/ANS-3.1-1978, Section 4.4.5 states:

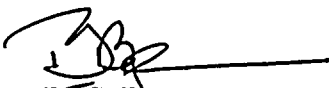
“...the responsible person shall have six years experience in the field of quality assurance, preferably at an operating nuclear plant, or operations supervisory experience. At least one year of this six years experience shall be nuclear power plant experience in the overall implementation of the quality assurance program. (This experience shall be obtained within the quality assurance organization.)...”

PP&L proposes to revise the qualification requirements for the Manager - Nuclear Assessment Services to the requirements stated in ANSI/ANS-3.1-1978.

Following NRC agreement with the proposed changes, PP&L will process the necessary changes to the FSAR, Operational Quality Assurance Program, and affected procedures to permanently implement the new Nuclear Assessment Services organization and requirements for the Manager- Nuclear Assessment Services.

If you need additional information regarding this proposed change, please contact Mr. A. J. Roscioli at (610) 774-4019.

Very truly yours,


R. G. Byram

Attachment

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector
Mr. C. Poslusny, Jr., NRC Sr. Project Manager

Senior Vice President Generation
and Chief Nuclear Officer

Manager
Nuclear Assessment Services

