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SUBJECT: Forwards marked-up pages from FSAR section 17.2 re plant QA program, to support NRC review of changes originally proposed in licensee 970818 submittal. Changes do not include other changes permitted to be made by util. under 10CFR50.54(a).

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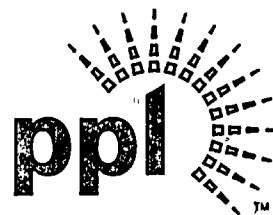
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**SUSQUEHANNA STEAM ELECTRIC STATION
SUBMITTAL OF MARKED-UP FSAR PAGES
QUALITY ASSURANCE PROGRAM CHANGES
PLA-4900**

Docket Nos. 50-387
and 50-388

- Reference (1) PP&L Letter PLA-4662, "Proposed Organizational Changes and Revised Qualifications for Manager - Nuclear Assessment Services," dated August 18, 1997.
- (2) PP&L Letter PLA-4809, "Closure of Need for NSAG (ISEG) - Related Changes to the Technical Specifications (Reference Reply to NOV 50-387/388-97-04-02)," dated December 22, 1997.
- (3) PP&L Letter PLA-4893, "Response to Request for Additional Information - Quality Assurance Program Changes," dated May 4, 1998.

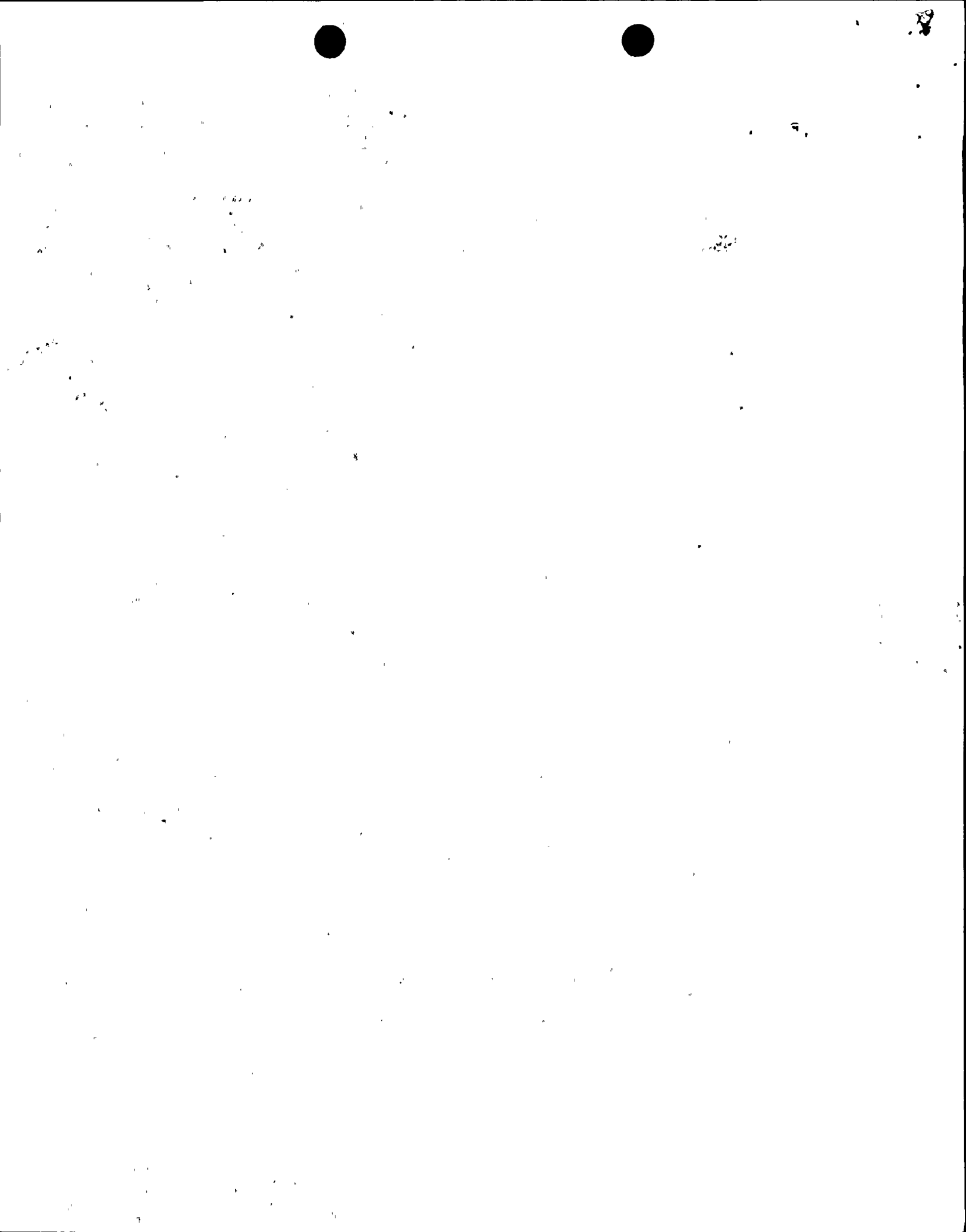
As requested, this letter provides marked-up pages from FSAR Section 17.2 (the QA program) to support your review of the changes originally proposed in Reference No. 1. Please note that these pages illustrate only those changes described in Reference No. 1, and do not include other changes permitted to be made by PP&L under 10 CFR 50.54(a).

Recall that the changes proposed in Reference No. 1 included changes to the PP&L Nuclear Assurance (previously Nuclear Assessment Services) organization and to the qualification requirements for the Manager - Nuclear Assurance. As agreed to with the Staff, the organizational changes have been implemented, but will be considered temporary pending NRC review. Following formal NRC approval, the changes will be permanently implemented and revisions made to other affected Department documents. Reference No. 1 included a description of the proposed change, as well as the basis for the change.

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Attachment 1 provides a summary of the change, including (1) a description of the change; (2) the reason for the change; and (3) the basis for concluding that the revised program incorporating the change continues to satisfy the criteria of 10CFR50, Appendix B and the QA program. Attachment 2 contains the associated marked-up FSAR pages.

We hope that the enclosed information facilitates your review. If you have any additional questions or need any additional information to support your review, please contact Mr. R.R. Sgarro at (610) 774-7552.

Sincerely,



R. G. Byram

Attachments

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector - SSES
Mr. V. Nerses, NRC Sr. Project Manager - Rockville
Mr. K. Kerns, PA DEP/BRP



ATTACHMENT 1 TO PLA-4900

Summary of QA Program Changes Described in PLA-4662



**SUMMARY OF CHANGES TO FSAR QA PROGRAM DESCRIPTION:
CHANGE TO NUCLEAR ASSURANCE ORGANIZATION AND QUALIFICATION
REQUIREMENTS FOR MANAGER - NUCLEAR ASSURANCE**

Proposed Changes:

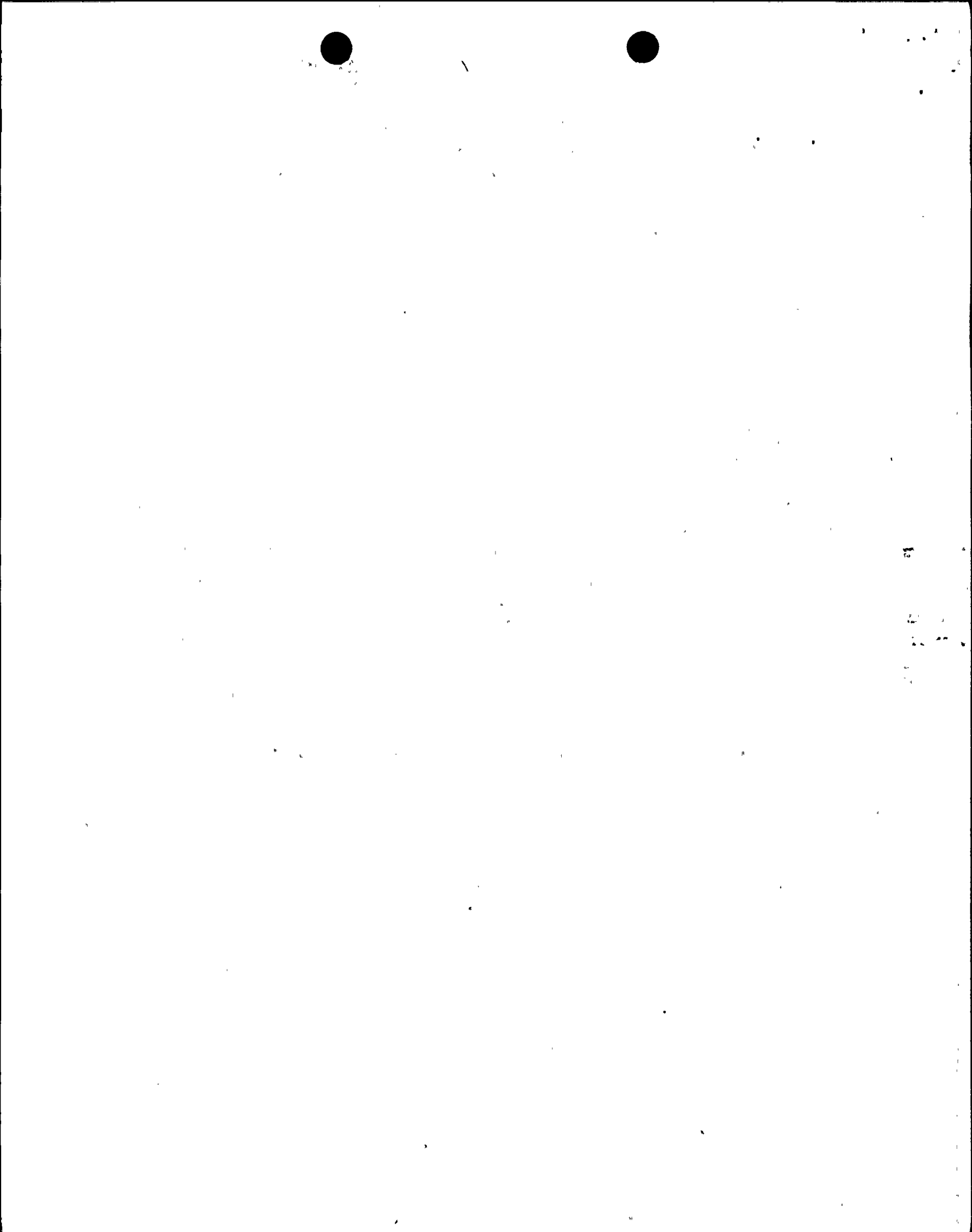
1. **Organization Change:** In addition to the audit, quality control and surveillance functions, the Manager-Nuclear Assurance would be responsible for the assessment and employee concerns functions. The Independent Safety Engineering Group would be removed as a direct report of the Manager - Nuclear Assurance, and instead report to the Senior Vice President - Generation/Chief Nuclear Officer. The Operating Experiences Services Group would be removed as a direct report of the Manager - Nuclear Assurance, and incorporated into the organization reporting to the General Manager - Susquehanna SES.
2. **Change to Qualification Requirements:** PP&L proposes to revise the qualification requirements for the Manager-Nuclear Assurance to the requirements stated in ANSI/ANS-3.1-1978. 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.)...”

For details regarding the specific changes to the QA program description, see the marked-up pages included in Attachment 2.

Reason for Changes:

1. **Organization Change:** During discussions with the NRC Staff, PP&L concurred that the Independent Safety Engineering Group and the Operational Experience Services Group functions should be removed from the Nuclear Assurance organization to guard against the *potential* for distraction from quality functions. Employee Concerns and Assessment Process Services were added to the Nuclear Assurance organization to further strengthen the quality oversight function.
2. **Change to Qualification Requirements:** PP&L proposes to modify its qualification requirements for the Manager-Nuclear Assurance to reflect the provisions of ANSI/ANS-3.1-1978, Section 4.4.5, that are endorsed by the NRC in Section 17.1 of NUREG-0800.



Basis for Concluding that the Revised Program Incorporating the Change Continues To Satisfy the Criteria of 10CFR50, Appendix B and the QA Program Description:

1. **Organization Change:** The Senior Vice President - Generation/Chief Nuclear Officer continues to maintain overall authority and responsibility for the Operational Quality Assurance Program. The Manager-Nuclear Assurance continues to maintain 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 Assurance, the quality and safety focus of the Nuclear Department is strengthened. The scope of control for the Manager-Nuclear Assurance has not increased substantially, and now includes other quality/safety assessment functions that strengthen the quality/safety focus of the Nuclear Department.

2. **Change to Qualifications:** NUREG-0776 approval was based on a PP&L commitment to assure that the manager of nuclear quality assurance had 10 years of experience with at least 5 years of active participation in nuclear-related, quality assurance functions. NUREG-0800, the NRC Standard Review Plan, has endorsed the use of ANSI/ANS-3.1-1978, Section 4.4.5 for the quality assurance manager qualifications. Specifically, Section 17.1 states in part:

“The qualifications of the QA Manager should be at least equivalent to those described in Section 4.4.5 of ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel," as endorsed by the regulatory positions in Regulatory Guide 1.8.”

In summary, the proposed changes to the Nuclear Assurance organization and the qualification requirements for the Manager-Nuclear Assurance continue to satisfy 10CFR50, Appendix B and the quality assurance program.

ATTACHMENT 2 TO PLA-4900

QA Program Changes Described in PLA-4662

SSES-FSAR

inadequate, PP&L shall develop the required practices and procedures with the controls necessary for their implementation.

17.2.1 ORGANIZATION

PP&L has established the Nuclear Department in order to provide a cohesive management team with the primary objective of providing long term technical and management support for Susquehanna SES. In addition to the resources within the Nuclear Department, corporate support is provided by the Construction Manager and the Manager - Purchasing and Contracts. The key management positions responsible for the performance of safety-related activities are listed below and are described in the following subsections. Figure 17.2-2 shows the organizational structure and lines of responsibility for the groups that provide technical and management support for Susquehanna SES.

Senior Managers:

- Senior Vice President-Nuclear *Generation and Chief Nuclear Officer*
- Vice President-Nuclear Operations
- Plant Manager-Susquehanna SES
- Manager-Nuclear Engineering

Functional Unit Managers:

- Manager-Nuclear ~~Assessment Services~~ *Assurance*
- Manager-Nuclear Information Services
- Manager-Nuclear Department Support
- Manager-Nuclear Business Improvement
- Manager-Nuclear Training
- Manager-Nuclear Operations
- Manager-Nuclear Maintenance
- Manager-Nuclear Plant Services
- Manager-Nuclear Outages
- Manager-Nuclear Modifications
- Manager-Nuclear Technology
- Manager-Nuclear Fuels
- Manager-Nuclear Systems Engineering
- Supervisor-Nuclear Licensing
- Supervisor-Nuclear Emergency Planning

Corporate Support:

- Vice President-Mobile Work Force
- Manager-Purchasing and Contracts
- Manager - Independent Safety Engineering Group*
- Manager - Special Projects - SSES*

In addition to the above individuals, the Susquehanna Review Committee (SRC) is established as a review, audit and advisory group, comprised of at least five key Nuclear Department

managers, whose function is to verify independently that the Susquehanna SES is being tested, operated and maintained in accordance with all safety-related, ALARA and environmental requirements. The SRC will perform the independent review mandated by ANSI N18.7.

Generation and Chief

17.2.1.1 Senior Vice President - Nuclear *Nuclear Officer (CNO)*

The Senior VP-Nuclear has overall authority and responsibility for the Susquehanna OQA Program and, as a result, he:

- (a) Requires the performance of an annual, preplanned and documented assessment of the OQA Program in which corrective action is identified and tracked.
- (b) Sets OQA Policies, goals and objectives for safe operation of Susquehanna SES.
- (c) Commits PP&L to an OQA Program designed to assure compliance with regulatory requirements.
- (d) Requires compliance with the provisions of the OQA Program and causes periodic assessments of PP&L commitments and established practices for safe plant operation.

In order to maintain a continuing involvement in QA matters, the Senior VP-Nuclear* receives periodic reports on the status and adequacy of the OQA Program from the Manager-NAS and reviews and approves the Operational Policy Statements contained in the OQA Manual prior to their issuance.

The Senior VP-Nuclear* delegates the responsibilities for attaining specified quality levels to the VP-Nuclear Operations and to other managers (e.g., Manager-Nuclear Training). The Senior VP-Nuclear delegates the responsibility for verifying that those quality levels have been met to the Manager-Nuclear Assessment Services.

Independent Safety Engineering Group

The Senior VP-Nuclear* delegates to the ~~Manager-Nuclear Assessment Services~~ the responsibility for performing the on-site Independent Safety Engineering Group (ISEG) function mandated by NUREG-0737.

The reporting relationships are shown in Figure 17.2-2. In addition, the Senior VP-Nuclear* has overall corporate responsibility for Susquehanna SES activities related to engineering and operations.

* Replace with "Generation and CNO"

managers, whose function is to verify independently that the Susquehanna SES is being tested, operated and maintained in accordance with all safety-related, ALARA and environmental requirements. The SRC will perform the independent review mandated by ANSI N18.7.

Generation and Chief
17.2.1.1 Senior Vice President - Nuclear Nuclear Officer (CNO)

The Senior VP-Nuclear has overall authority and responsibility for the Susquehanna OQA Program and, as a result, he:

- (a) Requires the performance of an annual, preplanned and documented assessment of the OQA Program in which corrective action is identified and tracked.
- (b) Sets OQA Policies, goals and objectives for safe operation of Susquehanna SES.
- (c) Commits PP&L to an OQA Program designed to assure compliance with regulatory requirements.
- (d) Requires compliance with the provisions of the OQA Program and causes periodic assessments of PP&L commitments and established practices for safe plant operation.

In order to maintain a continuing involvement in QA matters, the Senior VP-Nuclear* receives periodic reports on the status and adequacy of the OQA Program from the Manager-NAS and reviews and approves the Operational Policy Statements contained in the OQA Manual prior to their issuance.

The Senior VP-Nuclear* delegates the responsibilities for attaining specified quality levels to the VP-Nuclear Operations and to other managers (e.g., Manager-Nuclear Training). The Senior VP-Nuclear delegates the responsibility for verifying that those quality levels have been met to the Manager-Nuclear Assessment Services.

The Senior VP-Nuclear* delegates to the Manager-Nuclear ~~Assessment Services~~ the responsibility for performing the on-site Independent Safety Engineering Group (ISEG) function mandated by NUREG-0737.

The reporting relationships are shown in Figure 17.2-2. In addition, the Senior VP-Nuclear* has overall corporate responsibility for Susquehanna SES activities related to engineering and operations.

* Replace with "Generation and CNO"

SSES-FSAR

17.2.1.5 Manager - Nuclear ^{Assurance} Assessment Services

The Manager-NAS ^{Nuclear Assurance} is responsible for:

- (a) Directing and coordinating the development and updating of PP&L's OQA Program and the NAS Functional Unit Procedures.
- (b) Interpreting the OQA Program, subject to the approval of the Senior Vice President-Nuclear.
- (c) Auditing, assessing, inspecting, witnessing, and performing surveillances ^{Generation 2 CNO} as necessary, of contractor, vendor and PP&L activities which fall within the scope of the OQA Program (e.g., Safety-related, Fire Protection, Environmental Protection Plan, Packaging and Transporting of Radioactive Material) to determine the degree of compliance with the requirements of the OQA Program and/or procurement documents, and reporting the results of these activities to responsible management. Further definition and qualification of the scope of the above activities is provided in this FSAR Section 17.2 and the PP&L Operational Policy Statements.
- (d) Providing for the Quality Assurance review of Nuclear Department procedures to ensure compliance with the OQA Program.
- (e) Providing training assistance in OQA Program requirements.
- (f) Implementing the QA and site QC activities identified in the OQA Program.

~~(g) Performing the on-site Independent Safety Engineering functions mandated by NUREG-0737.~~

- (g) (X) Evaluating the QA program of potential suppliers of material, equipment and services to determine the program's adequacy for providing quality products or services.

^{Nuclear Assurance}
The Manager-NAS is responsible for taking action (including work stoppage), as necessary to correct conditions adverse to quality. The Manager-NAS is responsible for informing the Vice President - Nuclear Operations when it is determined that safety-related components or the activities performed on these components fail to comply with approved specifications, plans, or procedures. The Vice President - Nuclear Operations retains

Rev. 51, 02/97

17.2-5

- (h) Implementing the Nuclear Department's Employee Concerns Program.

the responsibility for the evaluation of conditions adverse to quality with regard to plant operation and is responsible for determining when an operating unit(s) is to be shut down. PP&L requires the Manager-NAS to have qualifications commensurate with the responsibilities of that position. ~~The minimum qualification requirements for the Manager-NAS are stated in FSAR Subsection 13.1.1.~~

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Nuclear Assurance
The Manager-NAS and the NAS Staff are independent of organizations responsible for performing safety-related activities. NAS has sufficient authority and organizational freedom to identify quality problems, to initiate, recommend or provide solutions through designated channels, and to verify implementation of solutions.

Nuclear Assurance
To fulfill the organizational responsibilities, NAS is structured as functional groups. Figure 17.2-3 diagrams the reporting relationships of these groups and their functional responsibilities are described below:

A. Auditing Services

1. Audits

- (a) Schedule, scope, and perform audits of PP&L organizations.
- (b) Perform audits requested by the Susquehanna Review Committee.
- (c) Interface with third party auditors (e.g., CMAP, INPO) for resolution of items which are identified in audit findings or issues involving NAS activities.
- (d) Review/accept vendor QA Programs/Manuals.
- (e) Evaluation of suppliers' QA Programs for adequacy in providing quality products or services and Commercial Grade Items (CGIs).
- (f) Provide the PP&L interface with the Nuclear Procurement Issues Committee (NUPIC), Nuclear Fuels Users Forum (NFUF), Nuclear Software Management Group (NUSMG), and Nuclear Energy Institute (NEI).

2. Source Verification

- (a) Develop inspection criteria and plans.

INSERT A

The Manager - Nuclear Assurance 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.)" [see ANSI/ANS-3.1-1978, Section 4.4.5]

D. Surveillance Services

1. Schedule, scope, and perform QA Surveillances of plant activities.
2. Perform document reviews as required or requested.
3. Provide support for the Plant Reliability Enhancement Program.
4. Perform, when requested, ~~NAS~~ ^{Nuclear Assurance} verification of corrective actions and commitments described in Licensee Event Reports and other correspondence to the NRC.
5. Provide ~~NAS~~ ^{Nuclear Assurance} Surveillance Observation Training/Retraining.

INSERT
B

~~Manager Independent Safety Evaluation Services Engineering Group~~

17.2.1.20 ~~The Manager - Independent Safety Engineering Group is responsible for~~ independently evaluating PP&L's nuclear activities with particular emphasis on the effectiveness and quality of the Company's nuclear operations and related safety/environmental programs. This responsibility includes performing the on-site Independent Safety Engineering Group functions mandated by NUREG-0737.

MOVE TO FOLLOW
17.2.1.19

~~Operating Experience Services - Manager - Special Projects - SSES~~

17.2.1.21 ~~The Manager - Special Projects - SSES is responsible for~~ Administration of the Department's Condition Report and Operating Experience Program. This includes development and maintenance of trending, tracking and reporting activities associated with the program, and maintenance of program procedures.

17.2.1.6 Manager - Nuclear Information Services

The Manager-Nuclear Information Services is responsible for the ongoing planning, development, and maintenance of information services including hardware and software. The Manager-NIS is also responsible for providing procedural guidance on the implementation of the Software Quality Assurance Program.

17.2.1.7 Manager - Nuclear Department Support

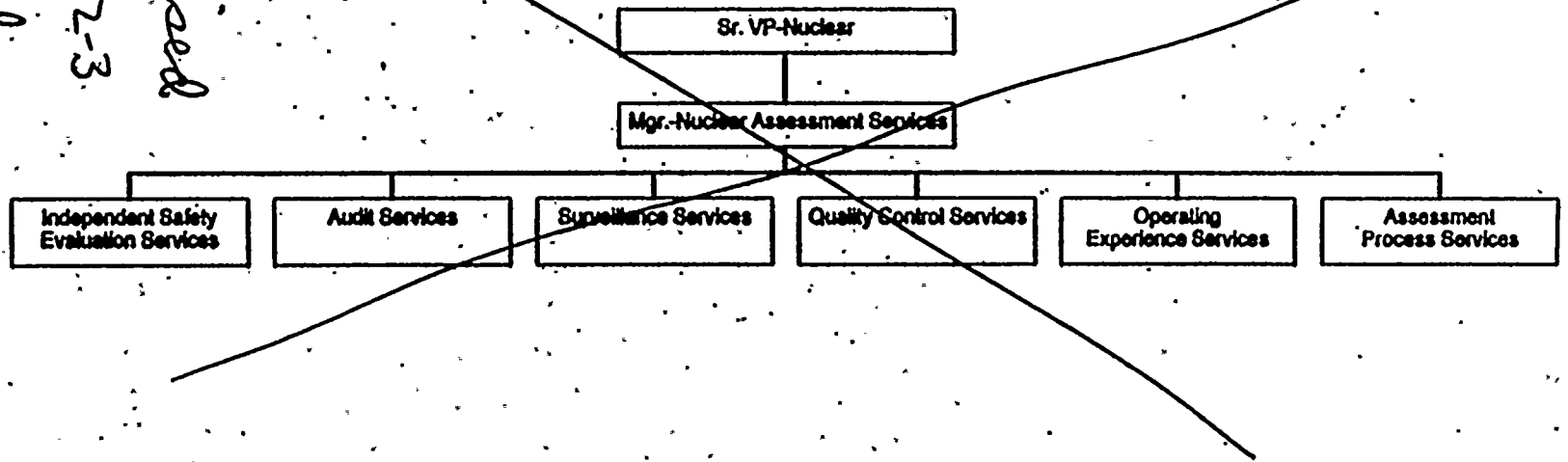
The Manager-Nuclear Department Support is responsible for developing and implementing a records management/document

INSERT B

E. Employee Concerns Program

The Nuclear Department established the Employee Concerns Program to address and resolve concerns raised by individuals. This activity is not mandated by the provisions of 10CFR50, Appendix B.

*insert revised
Figure 17.2-3
attached*



FSAR REV. 49, 04/95
SUSQUEHANNA STEAM ELECTRIC STATION
UNITS 1 AND 2
FINAL SAFETY ANALYSIS REPORT

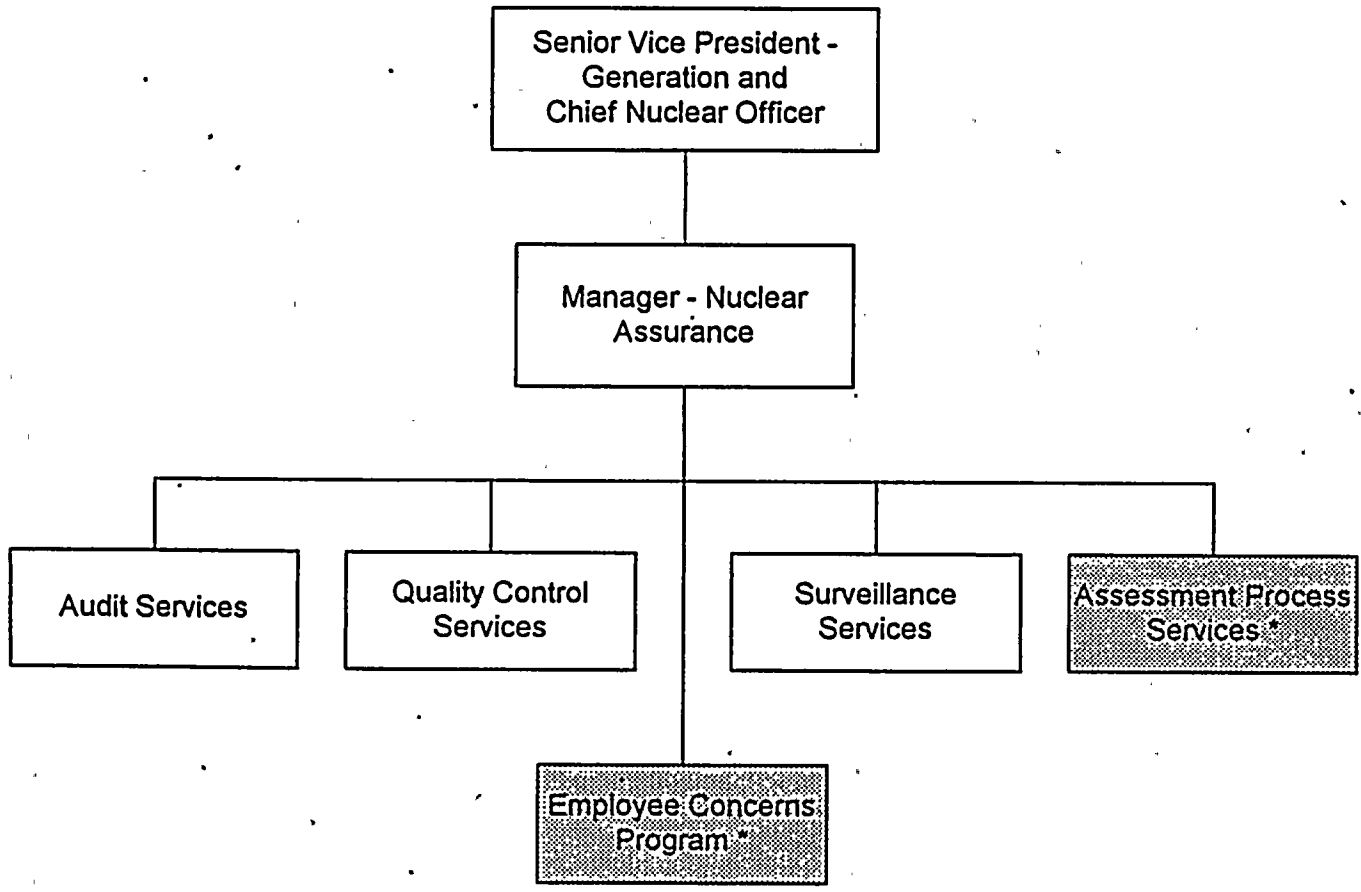
**NUCLEAR
ASSESSMENT SERVICES
FUNCTIONAL STRUCTURE**

FSAR FIGURE 17.2-3



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* The activities of this group are not mandated by the provisions of 10CFR50 Appendix B.

Figure 17.2-3 (Revised)

