



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

June 20, 2017
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10CFR50.54(a)
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Attention: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498 and STN 50-499
Submittal of Operations Quality Assurance Plan Change QA-085

STP Nuclear Operating Company (STPNOC) submits the attached change to revision 22 of the Operations Quality Assurance Plan (OQAP). This change provides the necessary revision to Chapter 1.0 of the OQAP in order to incorporate updates/changes in organizational alignment and reporting, including some strictly editorial rearrangements in the overall organizational presentation order. A clarification change is made to Chapter 19.0 to update the Security Plans (and implementing procedures and changes thereto) for which the station Plant Operations Review Committee (PORC) is responsible for review. An additional administrative change/clarification is made to align OQAP Chapter 19.0 verbiage with approved STP Technical Specification section 6.1.1 verbiage regarding the requirement for Plant General Manager approval, prior to implementation, of certain tests and experiments and of modifications to systems or equipment that affects nuclear safety.

These changes do not represent a reduction in commitment and therefore do not require NRC approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(3).

There are no commitments in this letter.

If there are any questions regarding this matter, please contact Mr. J. R. Mertink at (361) 972-7392 or Randall Exum at (361) 972-7099.

A handwritten signature in black ink, appearing to read "Dennis L. Koehl", is written over a light blue circular stamp.

Dennis L. Koehl
President and CEO

- Attachments: 1. 10CFR 50.54(a) Evaluation for QA-085
2. QA-085 Summary of Changes
3. Operations Quality Assurance Plan Change QA-085

cc:

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Attachment 1

10CFR50.54(a) Evaluation for QA-085

10CFR50.54(a) Evaluation for QA-085

This change provides the necessary revision to Chapter 1.0 of the OQAP in order to incorporate updates/changes in organizational alignment and reporting, including some strictly editorial rearrangements in the overall organizational presentation order. A clarification change is made to Chapter 19.0 to update the Security Plans (and implementing procedures and changes thereto) for which the station Plant Operations Review Committee (PORC) is responsible for review. An additional administrative change/clarification is made to align OQAP Chapter 19.0 verbiage with approved STP Technical Specification section 6.1.1 verbiage regarding the requirement for Plant General Manager approval, prior to implementation, of certain tests and experiments and of modifications to systems or equipment that affects nuclear safety. These changes do not represent a reduction in commitment and therefore do not require NRC approval prior to implementation in accordance with the provisions of 10CFR50.54(a)(3).

Attachment 2

QA-085 Summary of Changes

QA-085 Summary of Changes

CHAPTER	LOCATION	ACTION	TEXT
TOC	CH 1.0	Insert	QA-85
	CH 19.0	Insert	QA-85
CH 1.0	5.1	Delete	the Senior Vice President, Operations
	Rearrange presentation order only.	Insert	includes the Executive Vice President and Chief Nuclear Officer, the Executive President and Chief Administrative Officer, and the Executive Vice President and Chief Financial Officer.
	5.3,5.3.1,5.3.1.1,5.3.1.2,5.3.1.3,5.3.2,5.3.3	Delete	Move to section 5.4 and subsections (rearrange presentation order).
	5.3 -This is old section 5.5 with no changes	Insert	The Executive Vice President and Chief Nuclear Officer is responsible for implementing quality program requirements applicable to the following functions: generation, engineering and projects. The management of these functions report to the Executive Vice President and Chief Nuclear Officer.
	5.3.1-This is old 5.4 with changes. Changed Projects (Spent Fuel Management Project) to Projects (Out/PIP/PMPI).	Insert	The Senior Vice President, Operations is responsible for implementing quality program requirements applicable to the following function: Projects (Out/PIP/PMPI). The management of this function reports to the Senior Vice President, Operations.
	5.3.1.1-This is old 5.5.3 with changes. Changed strategic projects, outage management, and major projects to strategic projects, projects, outage management, Spent Fuel Management	Insert	The General Manager, Projects (Out/PIP/PMPI) is responsible for implementing quality program requirements applicable to the following functions: strategic projects, projects, outage management, Spent Fuel Management Project, major, and corporate projects. The management of these functions report to the General

	Project, major and corporate projects. Updated title of General Manager, Projects by adding Out/PIP/PMPI).		Manager, Projects (Out/PIP/PMPI).
CH 1.0	5.3.2-This is old 5.5.1 with no changes	Insert	The Site Vice President is responsible for implementing quality program requirements applicable to staffing STP with qualified personnel and acquiring and coordinating the assistance of internal and external organizations for the following functions including: plant general management and training. The senior management of these functions report to the Site Vice President.
	5.3.2.1-This is old 5.5.1.1 with no changes	Insert	The Plant General Manager has prime responsibility for the safe operations of the units. The plant staff, under the direction of the Plant General Manager, develops detailed procedures and instructions for testing, operation, modification, and maintenance of the STP. The Plant General Manager is responsible for implementing quality program requirements applicable to the following functions including: operations, maintenance, chemistry, health physics, and work control. The management of these functions report to the Plant General Manager.
	5.3.3-This is old 5.5.2 with no changes	Insert	The General Manager, Engineering is responsible for implementing quality program requirements applicable to the following functions: design engineering, testing/program engineering, systems engineering, maintenance engineering, and nuclear fuel & analysis (includes risk management). The management of these functions report to the General Manager, Engineering.
	5.3.3.1-This is old 5.5.2.1 with no changes.	Insert	The Manager, Nuclear Fuel & Analysis is responsible for implementing quality program requirements applicable to the following functions: reactor engineering,

			<p>core design, reload safety analysis, nuclear fuel performance and supply, and risk management (probabilistic risk assessment and risk informed applications).</p> <p>Activities related to the Comprehensive Risk Management Program include oversight of Probabilistic Safety Assessment activities. The Comprehensive Risk Management Expert Panel guides the implementation of the Comprehensive Risk Management Program and is composed of a Chairman and additional senior level management designated by the President and Chief Executive Officer.</p>
CH 1.0	5.4 - This is old section 5.3 with no changes.	Insert	The Executive Vice President and Chief Administrative Officer is responsible for implementing quality program requirements applicable to the following functions: corporate services, quality assurance, plant protection, emergency response, access authorization, fitness for duty, and regulatory affairs. The management of these functions report to the Executive Vice President and Chief Administrative Officer.
	5.4.1-This is old 5.3.1 with no changes.	Insert	The Manager, Nuclear Oversight is responsible for implementing quality program requirements applicable to quality assurance.
	5.4.1.1-This is old section 5.3.1.1 with no changes.	Insert	<p>The Manager, Nuclear Oversight has the independence to conduct Quality activities without undue pressure of cost or schedule and is responsible for the following:</p> <p>Development, maintenance, and independent verification of implementation of the STP Quality Program; making periodic reports on its effectiveness; review of selected documents which control activities</p>

			<p>within its scope; and preparation, control, and approval of the OQAP and revisions thereto;</p> <p>Identify, initiate, recommend, or provide solutions to quality-related problems and verify the implementation and effectiveness of the solutions; and</p> <p>Independent oversight activities, including audits, independent assessments, evaluations, surveillances, performance monitoring, inspections, independent oversight of NDE examinations, vendor oversight, and administration of organizational unit independent review activities.</p>
CH 1.0	5.4.1.2-This is old 5.3.1.2 with no changes.	Insert	The Manager, Nuclear Oversight, at his discretion, has unfettered access to the President and Chief Executive Officer and the Board of Directors.
	5.4.1.3-This is old 5.3.1.3 with no changes	Insert	The Manager, Nuclear Oversight has the authority to stop work for cause. This authority has been granted by the President and Chief Executive Officer. The Quality organization, including the inspection staff, is based upon the anticipated Quality involvement in operations, modification, and maintenance activities.
CH 1.0	5.4.2-This is old 5.3.2 with no changes.	Insert	The General Manager, Corporate Services is responsible for implementing quality program requirements applicable to the following functions: information technology, cyber security, records management and technical support services. The management of these functions report to the General Manager, Corporate Services.
	5.4.3 - This is old 5.3.3 with no changes	Insert	The Manager, Plant Protection/Emergency Response is responsible for implementing quality program requirements applicable to

			plant protection, emergency response, fitness for duty and access authorization. The management of these functions report to the Manager, Plant Protection/Emergency Response.
CH 1.0	5.5-This is old 5.6 with no changes.	Insert	The Executive Vice President and Chief Financial Officer is responsible for implementing quality program requirements applicable to contracts & procurement. The management of this function reports to the Executive Vice President and Chief Financial Officer.
CH 19.0	5.1.6.9	Delete	Review of the Security Plan and implementing procedures and changes thereto.
	5.1.6.9	Insert	Review of Security Plans: Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, Cyber Security Plan, and implementing procedures and changes thereto.
	5.3.1.1-middle of 3aragraph	Delete	security plan implementing procedures
	5.3.1.1-middle of paragraph	Insert	security plans implementing procedures
	5.3.1.2	Delete	safety related structures systems and components; Proposed modifications to safety related structures, systems, and components shall be approved by the Plant General Manager prior to implementation.
CH 19.0	5.3.1.2	INSERT	systems or equipment that affects nuclear safety
	5.3.1.3	Delete	Proposed tests and experiments shall be approved by the Plant General Manager.
	5.3.1.4 New section added which combines/ relocates the sentences	Insert	The Plant General Manager or the Plant General Manager's designee shall approve, prior to implementation,

	deleted from 5.3.1.2 and 5.3.1.3. Add that Plant General Manager approves modifications to systems or equipment that affects nuclear safety. This aligns the OQAP wording with the approved Tech. Spec. 6.1.1 wording.		each proposed test and experiment that affects nuclear safety and is not described in the Final Safety Analysis Report, and each modification to systems or equipment that affects nuclear safety.
CH 19.0	5.3.1.5-This is the old 5.3.1.4 with no changes.	Insert	Individuals responsible for reviews performed in accordance with sections 5.3.1.1, 5.3.1.2, and 5.3.1.3 shall be members of the plant management staff previously designated by the Plant General Manager. Each review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
	3.1.6-This is the old 5.3.1.5 with no changes.	INSERT	Each review will include a determination of whether or not prior NRC approval is involved pursuant to 10CFR50.59. NRC approval of items will be obtained prior to Plant General Manager approval for implementation.

Attachment 3

Operations Quality Assurance Plan Change QA-085

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2.0	Program Description	19	2-1-14	QA-083, QA-084
3.0	Conduct of Operation	9	2-1-14	
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15.0	Quality Oversight Activities	14	2-1-14	QA-084
16.0	Independent Technical Review	14	1-20-16	QA-084
17.0	ASME Code Section XI – Repairs and Replacements	11	2-1-14	
18.0	ASME Code Section XI – Inservice Inspection and Testing	12	2-1-14	
19.0	Administrative Controls	7	1-20-16	QA-085
20.0	Dry Cask Storage System and Independent Spent Fuel Storage Installation	1	2-1-14	

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1.0 PURPOSE

1.1 The purpose of this chapter is to describe the organizational structure as related to quality assurance and to establish the responsibilities of organizations for the South Texas Project (STP).

2.0 SCOPE

2.1 STP Nuclear Operating Company (STPNOC), as licensee, has the Quality responsibility for design, engineering, procurement, fabrication, modification, maintenance, repair, in-service inspection, refueling, testing, and operation of the STP Units 1 & 2, Dry Cask Storage System (DCSS), and Independent Spent Fuel Storage Installation (ISFSI).

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 None

5.0 RESPONSIBILITIES

5.1 The STPNOC organization includes the Executive Vice President and Chief Nuclear Officer, the Executive Vice President and Chief Administrative Officer, and the Executive Vice President and Chief Financial Officer. The senior management of these groups report to the President and Chief Executive Officer.

5.2 The President and Chief Executive Officer has overall responsibility for the implementation of the Operations Quality Assurance Program and approving the Operations Quality Assurance Plan (OQAP) and revisions thereto. The President and Chief Executive Officer shall designate those members of senior management to function as the Senior Management Team.

5.3 The Executive Vice President and Chief Nuclear Officer is responsible for implementing quality program requirements applicable to the following functions: generation, engineering and projects. The management of these functions report to the Executive Vice President and Chief Nuclear Officer.

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5.3.1 The Senior Vice President, Operations is responsible for implementing quality program requirements applicable to the following function: Projects (Out/PIP/PMPI). The management of this function reports to the Senior Vice President, Operations.

5.3.1.1 The General Manager, Projects (Out/PIP/PMPI) is responsible for implementing quality program requirements applicable to the following functions: strategic projects, projects, outage management, Spent Fuel Management Project, major, and corporate projects. The management of these functions report to the General Manager, Projects (Out/PIP/PMPI).

5.3.2 The Site Vice President is responsible for implementing quality program requirements applicable to staffing STP with qualified personnel and acquiring and coordinating the assistance of internal and external organizations for the following functions including: plant general management and training. The senior management of these functions report to the Site Vice President.

5.3.2.1 The Plant General Manager has prime responsibility for the safe operations of the units. The plant staff, under the direction of the Plant General Manager, develops detailed procedures and instructions for testing, operation, modification, and maintenance of the STP. The Plant General Manager is responsible for implementing quality program requirements applicable to the following functions including: operations, maintenance, chemistry, health physics, and work control. The management of these functions report to the Plant General Manager.

5.3.3 The General Manager, Engineering is responsible for implementing quality program requirements applicable to the following functions: design engineering, testing/program engineering, systems engineering, maintenance engineering, nuclear fuel & analysis (includes risk management), and engineering projects. The management of these functions report to the General Manager, Engineering.

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5.3.3.1 The Manager, Nuclear Fuel & Analysis is responsible for implementing quality program requirements applicable to the following functions: reactor engineering, core design, reload safety analysis, nuclear fuel performance and supply, and risk management (probabilistic risk assessment and risk-informed applications).

Activities related to the Comprehensive Risk Management Program include oversight of Probabilistic Safety Assessment activities. The Comprehensive Risk Management Expert Panel guides the implementation of the Comprehensive Risk Management Program and is composed of a Chairman and additional senior level management designated by the President and Chief Executive Officer.

5.4 The Executive Vice President and Chief Administrative Officer is responsible for implementing quality program requirements applicable to the following functions: corporate services, quality assurance, plant protection, emergency response, access authorization, fitness for duty, and regulatory affairs. The management of these functions report to the Executive Vice President and Chief Administrative Officer.

5.4.1 The Manager, Nuclear Oversight is responsible for implementing quality program requirements applicable to quality assurance.

5.4.1.1 The Manager, Nuclear Oversight has the independence to conduct Quality activities without undue pressure of cost or schedule and is responsible for the following:

Development, maintenance, and independent verification of implementation of the STP Quality Program; making periodic reports on its effectiveness; review of selected documents which control activities within its scope; and preparation, control, and approval of the OQAP and revisions thereto;

Identify, initiate, recommend, or provide solutions to quality-related problems and verify the implementation and effectiveness of the solutions; and

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Independent oversight activities, including audits, independent assessments, evaluations, surveillances, performance monitoring, inspections, independent oversight of NDE examinations, vendor oversight, and administration of organizational unit independent review activities.

5.4.1.2 The Manager, Nuclear Oversight, at his discretion, has unfettered access to the President and Chief Executive Officer and the Board of Directors.

5.4.1.3 The Manager, Nuclear Oversight has the authority to stop work for cause. This authority has been granted by the President and Chief Executive Officer. The Quality organization, including the inspection staff, is based upon the anticipated Quality involvement in operations, modification, and maintenance activities.

5.4.2 The General Manager, Corporate Services is responsible for implementing quality program requirements applicable to the following functions: information technology, cyber security, records management and technical support services. The management of these functions report to the General Manager, Corporate Services.

5.4.3 The Manager, Plant Protection/Emergency Response is responsible for implementing quality program requirements applicable to plant protection, emergency response, fitness for duty and access authorization. The management of these functions report to the Manager, Plant Protection /Emergency Response.

5.5 The Executive Vice President and Chief Financial Officer is responsible for implementing quality program requirements applicable to contracts & procurement. The management of this function reports to the Executive Vice President and Chief Financial Officer.

6.0 REQUIREMENTS

6.1 The fundamental responsibility for implementing quality program requirements is assigned to all personnel performing activities affecting the safe and reliable operation of STP. These personnel and their management are responsible for implementing through approved procedures and other work documents, the quality assurance program controls described in the OQAP. Line organizational details and responsibilities for Units 1 & 2 are further described in STP UFSAR Chapter 13.1.

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7.0 DOCUMENTATION

7.1 None

8.0 ATTACHMENTS

8.1 None

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1.0 PURPOSE

1.1 The purpose of this chapter is to describe the administrative controls (as previously documented in the Technical Specifications) as related to quality assurance for the South Texas Project (STP).

2.0 SCOPE

2.1 STP Nuclear Operating Company (STPNOC), as licensee, has the Quality responsibility for administrative controls of the STP.

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 OQAP Chapter 2.0, Table I

4.2 STP Technical Specifications

4.3 Updated Final Safety Analysis Report

4.4 OQAP Chapter 8, Control and Issuance of Documents

4.5 OQAP Chapter 14, Records Control

4.6 OQAP Chapter 15, Quality Oversight Activities

4.7 10CFR72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste

5.0 REQUIREMENTS

5.1 The Plant Operations Review Committee (PORC) shall function to advise the Plant General Manager on all matters related to nuclear safety.

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- 5.1.1 The PORC shall be composed of six members, who shall be appointed in writing by the Plant General Manager from senior experienced onsite individuals, at the manager level or equivalent, representing each of the following disciplines: engineering, operations, chemistry, health physics, quality assurance/quality control and maintenance. The quality assurance/quality control representatives shall not be appointed as PORC Chairman.
- 5.1.2 The PORC Chairman shall be appointed in writing from among those members by the Plant General Manager. One of the members shall meet the requirements of Regulatory Guide 1.8 (Personnel Selection and Training – Revision 1-R), Radiation Protection Manager.
- 5.1.3 All alternate members shall be appointed in writing by the Plant General Manager to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.
- 5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.
- 5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions shall consist of the Chairman or his designated alternate and three other members including alternates.
- 5.1.6 The PORC shall be responsible for:
 - 5.1.6.1 Review of all safety-related station administrative procedures and changes thereto.
 - 5.1.6.2 Review of safety evaluations for (1) procedures, (2) changes to procedures, structures, components, or systems, and (3) tests or experiments completed under the provisions of 10CFR50.59 to verify that such actions did not require prior Nuclear Regulatory Commission (NRC) approval.
 - 5.1.6.3 Review of proposed (1) procedures, (2) changes to procedures, structures, components, or systems, and (3) tests or experiments completed under the provisions of 10CFR50.59 which may require prior NRC approval.

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- 5.1.6.4 Review of all required programs by Technical Specification 6.8 and the Technical Requirements Manual 6.8 and changes thereto.
- 5.1.6.5 Review of all proposed changes to the Technical Specifications or the Operating License.
- 5.1.6.6 Review of all REPORTABLE EVENTS.
- 5.1.6.7 Review of reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment or systems that affect nuclear safety.
- 5.1.6.8 Review of reports of unanticipated deficiencies in the design or operation of structures, systems, or components that affect nuclear safety.
- 5.1.6.9 Review of Security Plans: Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, Cyber Security Plan, and implementing procedures and changes thereto.
- 5.1.6.10 Review of the Emergency Plan and implementing procedures and changes thereto.
- 5.1.6.11 Review of the PROCESS CONTROL PROGRAM and implementing procedures and changes thereto.
- 5.1.6.12 Review of the OFFSITE DOSE CALCULATION MANUAL and implementing procedures and changes thereto.
- 5.1.6.13 Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Senior Management Team (SMT).

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- 5.1.6.14 Review of any accidental, unplanned, or uncontrolled release of liquid or gaseous radioactive effluents to the offsite environment and groundwater contamination events resulting in offsite notifications. The review shall include the preparation of reports covering evaluation, recommendations, and disposition of the corrective action(s) to prevent recurrence and the forwarding of these reports to the Plant General Manager and to the SMT.
- 5.1.6.15 Reports of violations of codes, regulations, orders, Technical Specifications, or Operating License requirements having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.
- 5.1.6.16 Review of the Fire Protection Program, quality-related implementing procedures and changes thereto.
- 5.1.6.17 Review of activities related to the Independent Spent Fuel Storage Installation and the Dry Cask Storage System pursuant to the provisions of 10CFR72.
- 5.1.7 The PORC shall recommend in writing to the Plant General Manager approval or disapproval of items considered under section 5.1.6.1 through 5.1.6.5 prior to their implementation, and items considered under sections 5.1.6.9 through 5.1.6.12 and 5.1.6.17.
- 5.1.8 The PORC shall render determinations in writing with regard to whether or not each item considered under sections 5.1.6.1 through 5.1.6.5 and 5.1.6.15 may require prior NRC approval under the provisions of 10CFR50.59.
- 5.1.9 The PORC shall provide written notification within 24 hours to the President and Chief Executive Officer and the Senior Management Team of disagreement between the PORC and the Plant General Manager; however, the Plant General Manager shall have the responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

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5.1.10 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of this chapter. Copies shall be provided to the President and Chief Executive Officer and the appropriate organizational unit.

5.2 Appropriate organizational units shall function to provide independent review of designated activities as required by ANSI N18.7-1976/ANS-3.2, Sections 4.3, 4.3.1, 4.3.3, and 4.3.4.

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5.2.1 Staff personnel required to perform these independent reviews shall collectively have the experience and competence to review operational activities in the following areas:

- 5.2.1.1 Nuclear power plant operations;
- 5.2.1.2 Nuclear engineering;
- 5.2.1.3 Chemistry and radiochemistry;
- 5.2.1.4 Metallurgy;
- 5.2.1.5 Instrumentation and control;
- 5.2.1.6 Radiological safety;
- 5.2.1.7 Mechanical and electrical engineering;
- 5.2.1.8 Civil engineering;
- 5.2.1.9 Training;
- 5.2.1.10 Nuclear assurance;
- 5.2.1.11 Nuclear licensing;
- 5.2.1.12 Plant security, and;
- 5.2.1.13 Environmental impact
- 5.2.1.14 Nondestructive testing
- 5.2.1.15 Dry fuel storage operations

Note: If sufficient expertise is not available from within the STPNOC for the areas noted above, appropriate expertise shall be brought to bear in the independent reviews through the use of outside consultants.

5.2.2 The Senior Management Team shall functionally report to and advise the President and Chief Executive Officer on those areas of responsibility specified in sections 5.2.3 and 5.2.4.

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- 5.2.3 Appropriate organizational units shall be responsible for the review of:
- 5.2.3.1 The safety evaluations for: (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10CFR50.59, to verify that such actions did not require prior NRC approval;
 - 5.2.3.2 Proposed changes to procedures, equipment, or systems which require prior NRC approval under the provisions of 10CFR50.59;
 - 5.2.3.3 Proposed tests or experiments which require prior NRC approval under the provisions of 10CFR50.59;
 - 5.2.3.4 Proposed changes to Technical Specifications or the Operating License;
 - 5.2.3.5 Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
 - 5.2.3.6 Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
 - 5.2.3.7 All REPORTABLE EVENTS;
 - 5.2.3.8 All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
 - 5.2.3.9 Reports and meeting minutes of the PORC.
 - 5.2.3.10 Review of activities related to the Independent Spent Fuel Storage Installation and the Dry Cask Storage System pursuant to the provisions of 10CFR72.
- 5.2.4 Reports of audits of unit activities shall be reviewed by the Senior Management Team.

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5.2.5 Records of organizational unit independent review activities shall be prepared, approved, and distributed as indicated below:

5.2.5.1 Reports of organizational unit independent reviews encompassed by sections 5.2.3 and 5.2.4 shall be prepared, approved, and forwarded to the President and Chief Executive Officer and the Senior Management Team.

5.3 Technical Review and Control

5.3.1 Activities that affect nuclear safety shall be conducted as follows:

5.3.1.1 Procedures required by Technical Specification 6.8 and Technical Requirements Manual 6.8, and other procedures that affect nuclear safety, and changes thereto, shall be prepared, reviewed, and approved. Each such procedure, or change thereto, shall be reviewed by an individual/group other than the individual/group who prepared the procedure, or change thereto, but who may be from the same organization as the individual/group who prepared the procedure, or change thereto. Procedures other than station administrative procedures shall be approved by the Plant General Manager or the head of the responsible department prior to implementation. The Plant General Manager shall approve station administrative procedures, security plans implementing procedures, and emergency plan implementing procedures. Temporary changes to procedures, which clearly do not change the intent of the approved procedures, shall be approved prior to implementation by two members of the plant staff, at least one of whom holds a Senior Reactor Operator's License. Changes to procedures that may involve a change to the intent of the original procedure shall be approved by the individual authorized to approve the procedure prior to implementation of the change.

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5.3.1.2 Proposed changes or modifications to systems or equipment that affects nuclear safety shall be reviewed as designated by the Plant General Manager. Each such modification shall be reviewed by an individual/group other than the individual/group who designed the modification, but who may be from the same organization as the individual/group who designed the modification.

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5.3.1.3 Proposed tests and experiments that affect nuclear safety and that are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved prior to implementation. Each such test or experiment shall be reviewed by an individual/group other than the individual/group who prepared the test or experiment but who may be from the same organization as the individual/group who prepared the test or experiment.

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5.3.1.4 The Plant General Manager or the Plant General Manager's designee shall approve, prior to implementation, each proposed test and experiment that affects nuclear safety and is not described in the Final Safety Analysis Report, and each modification to systems or equipment that affects nuclear safety.

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5.3.1.5 Individuals responsible for reviews performed in accordance with sections 5.3.1.1, 5.3.1.2, and 5.3.1.3 shall be members of the plant management staff previously designated by the Plant General Manager. Each review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.

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5.3.1.6 Each review will include a determination of whether or not prior NRC approval is involved pursuant to 10CFR50.59. NRC approval of items will be obtained prior to Plant General Manager approval for implementation.

5.3.2 Records of the above activities shall be provided to the Plant General Manager, PORC, and/or the appropriate organizational unit as necessary for required reviews.

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6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with the requirements of this chapter and Reference 4.4.

7.0 ATTACHMENTS

7.1 None