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SUBJECT: Forwards Rev 24 to "Topical QA Rept."

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JAN 28 1993

10 CFR 50.54(a)
L-93-19

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Topical Quality Assurance Report (FPLTOAR 1-76A)

FPL is proposing a change to the method of implementing the baseline commitment for procurement document review contained in the Topical Quality Assurance Report (TQAR). The change provides for both the technical and quality review of procurement documents to be performed by Engineering personnel. Prior practice by FPL has been for the quality assurance portion of this review to be performed by Quality Assurance personnel. The reason for this change is to provide a more efficient and effective procurement document review process.

While this change does not, in our opinion, reduce commitments from the baseline documents contained in Appendix C to the TQAR, NRC review and concurrence prior to implementation is being requested in accordance with 10CFR50.54 (a) (3) and FPL TQR 2.0.

The specific revisions proposed to the TQAR to implement this change are contained and highlighted in the following attachments as noted: (additions are indicated by bold lettering and deletions by lining out the item to be deleted).

1. TQR 1.0, Rev. 24, Draft R770 D, 01/11/93
Page 8, paragraph 1.2.1.4(a)
Page 18, paragraph 1.2.1.5(b) (1)
Page 19 and 20, paragraph 1.2.1.5(b) (2)

NOTE: Other changes to TQR 1.0 contained in the attachment are non-substantive and are provided for information only. Formal submittal will occur as part of the next annual update to the NRC. FPL submitted TQR 1.0, Revision 21, in the 1992 annual update of the FPL TQAR (ref:L-92-165). Revisions 22 and 23 contain primarily organizational changes to be submitted as part of the next annual update.

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2. TQR 4.0, Rev. 6, Draft C/R772, 07/27/92
Page 2, paragraph 4.2.2

NOTE: Other changes to TQR 4.0 contained in the attachment are non-substantive and are provided for information only. Formal submittal will occur as part of the next annual update to the NRC.

3. Appendix C, Rev. 11, Draft B/R773, 06/24/92
Page 20, ANSI N45.2.13-1976, Section 3.3(a)

NOTE: Other changes to Appendix C contained in the attachment are non-substantive and are provided for information only. Formal submittal will occur as part of the next annual update to the NRC.

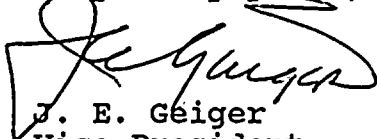
Our review of commitments in the baseline documents listed in Appendix C to the TQAR including 10CFR50 Appendix B, ANSI N45.2-1971, ANSI N45.2.13-1976 (Regulatory Guide 1.123, Rev. 1), and ANSI N18.7-1976 (Regulatory Guide 1.33, Rev. 2), concluded that in-line review of procurement documents by Quality Assurance personnel is not required. The review of procurement documents (and changes thereto) by Engineering personnel will continue to meet the requirements of ANSI 45.2.13-1976, paragraph 3.3 as clarified in Appendix C of the TQAR. FPL is confident that the change will enhance the review process as Engineering personnel will be able to more readily access pertinent information as well as possess a more direct understanding of the requirements and intent of the procurement documents.

To assure that the changeover of responsibility is successfully implemented, Quality Assurance has committed to work closely with Engineering and Materials Management personnel in revising the necessary Quality Instructions and training programs. In addition, the Quality Assurance audit program will provide increased attention to this area during the transition period, and continued emphasis as warranted in accordance with TQAR requirements.

Upon receipt of written NRC concurrence, or 60 days after submittal, whichever occurs first (in accordance with 10CFR50.54 (a)(3)(iv)), FPL will proceed to effect the necessary Quality Procedure, Quality Instruction, and training program revisions to implement the changes described above.

Should there be any questions, please contact me.

Very truly yours,



J. E. Geiger
Vice President
Nuclear Assurance

JEG/RAS/RGL/ejk
Enclosures

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspection, USNRC, St. Lucie Plant
Senior Resident Inspector, USNRC, Turkey Point Plant

