

DESCRIPTIONS AND JUSTIFICATION FOR PROPOSED CHANGES TO THE
PVNGS QUALITY ASSURANCE PROGRAM DESCRIPTION

PROPOSED CHANGE

APS proposes to change UFSAR Section 17.2.4.2.1.7 from:

"Quality-related work authorizing documents shall be reviewed by the Quality Assurance organization to determine the need for and annotation of independent inspection to be performed by the Quality Control Department."

to:

"Selected quality-related work authorizing documents shall be reviewed by the Nuclear Assurance organization to determine the need for and annotation of additional attributes requiring independent inspection."

REASON(S) FOR THE CHANGE

The reason for changing wording to "selected quality-related work" is to clarify this statement to reflect the program as defined in Section 17.2.4.3.1.3 which states in part "...Documents that define programs or establish administrative controls...shall be reviewed and concurred with by the QA organization prior to implementation. Review of lower tier procedures and other documents shall be performed on a graded approach...or on a sample basis." Making this change will remove conflicting wording between Sections 17.2.4.2.1.7 and 17.2.4.3.1.3 and allow Nuclear Assurance to implement a graded/sample basis approach when reviewing work control documents.

BASIS FOR CONCLUSION THAT THE REVISED PROGRAM CONTINUES TO
SATISFY THE CRITERIA OF 10 CFR 50 APPENDIX B AND THE PREVIOUSLY
ACCEPTED QUALITY ASSURANCE PROGRAM COMMITMENTS

The following is the basis for concluding that the revised program, incorporating the changes as described, continues to satisfy the criteria of 10 CFR 50 Appendix B and quality assurance program description commitments previously accepted by the NRC.

A comprehensive Quality Verification Program has been established at PVNGS and implemented to provide verification that Quality Plan requirements are implemented. Although a clarification in wording has been made within Section 17.2.4.2.1.7, the following requirements of the FSAR remain unchanged. Included is an explanation of how the implementation of these requirements will be conducted in the future.

17.2.4.2.1 - Requirements

17.2.4.2.1.2

The Engineering organization is responsible for the identification of attributes that require independent inspection. The Nuclear Assurance organization may elect to identify additional attributes requiring independent inspection based on quality history, trending, and quality engineering reviews that indicate the need for increased independent inspection.

Explanation: Currently Nuclear Assurance reviews quality related corrective maintenance work authorization documents to insert required inspection holdpoints (identified by other organizations) into work documents and to identify additional independent inspection as stated in 17.2.4.2.1.2 above. Nuclear Assurance resources have been used to support activities that are more appropriately conducted by organizations that perform work plan development. As the responsibility for insertion of inspection points is turned over to the organizations initiating the work documents, Nuclear Assurance will monitor the transition to assure compliance with regulatory and code requirements

17.2.4.2.1.7 - Independent Inspections

Independent inspection is performed on activities in which a high degree of independence is desired to assure correct performance was accomplished or when required by code, standard, or regulatory commitment.

Independent inspection is performed by ANSI N45.2.6 certified inspectors, by individuals in organizations authorized by the Nuclear Assurance organization to perform those activities and who meet the requirements of ANSI N45.2.6, and by NDE personnel certified in accordance with ASNT Recommended Practice No. SNT-TC-1A.

Inspectors (including NDE personnel) shall be qualified in accordance with applicable codes, standards, and PVNGS training programs and their qualification and/or certification shall be maintained current and documented.

[*Modified statement* - Selected quality-related work authorizing documents shall be reviewed by the Nuclear Assurance organization to determine the need for and annotation of additional attributes requiring independent inspection.]

Explanation: Work authorizing documents are lower tier documents and may be reviewed using a graded approach as stated in Section 17.2.4.3.1.3 below. Nuclear Assurance will use this graded/sample basis approach as one of the means for monitoring successful implementation of Section 17.2.4.2.1.2.

When independent inspection hold points have been established, either contractually by procurement, or internally by plant procedures, work may not proceed beyond the hold point until either the inspection is performed satisfactorily or waived by Nuclear Assurance.

Explanation: Independent Inspections will continue to be performed as identified in the current program.

17.2.4.3.1.3 - Document Reviews.

A program for reviewing documents that implement quality related activities shall be established to verify incorporation of the requirements of this Plan.

Documents that define programs or establish administrative controls (upper tier) shall be reviewed and concurred with by the Nuclear Assurance organization prior to implementation.

Reviews of lower tier procedures and other documents shall be performed on a graded approach as part of verification activities or on a sample basis.

ENCLOSURE 2

**AFFECTED UFSAR PAGES FOR PROPOSED CHANGES TO THE
PVNGS QUALITY ASSURANCE PROGRAM DESCRIPTION**

QUALITY ASSURANCE DURING
THE OPERATIONS PHASE17.2.4.2.1.7 Independent Inspections

Independent inspection is performed on activities in which a high degree of independence is desired to assure correct performance was accomplished or when required by code, standard, or regulatory commitment.

7 | Independent inspection is performed by ANSI N45.2.6 certified inspectors, by individuals in organizations authorized by the Nuclear Assurance organization to perform those activities and who meet the requirements of ANSI N45.2.6, and by NDE personnel certified in accordance with ASNT Recommended Practice No. SNT-TC-1A.

Inspectors (including NDE personnel) shall be qualified in accordance with applicable codes, standards, and PVNGS training programs and their qualification and/or certification shall be maintained current and documented.

Selected

7 | Quality related work authorizing documents shall be reviewed by the Nuclear Assurance organization to determine the need for and annotation of independent inspection, ~~to be performed by the Nuclear Assurance Department.~~

additional attributes requiring

7 | When independent inspection hold points have been established, either contractually by procurement, or internally by plant procedures, work may not proceed beyond the hold point until either the inspection is performed satisfactorily or waived by
7 | Nuclear Assurance.

For modification and nonroutine maintenance, independent inspections shall be conducted in a manner similar (frequency, type, and personnel performing such inspection) to that associated with construction phase activities.

7 | Where independent inspection is being performed on previously accepted lots, sampling inspection shall be representative and shall be applied only to the extent necessary to assure adequacy of control. The sampling plan shall be established by the Nuclear Assurance organization. Inspection personnel shall

