



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE

FLORIDA POWER & LIGHT COMPANY

ST. LUCIE, UNITS 1 AND 2, DOCKET NOS. 50-335 AND 50-389

TURKEY POINT, UNITS 3 AND 4, DOCKET NOS. 50-250 AND 50-251

1.0 INTRODUCTION

By letter dated April 29, 1997, Florida Power & Light Company (FPL) submitted a request to revise the FPL Topical Quality Assurance (QA) Report (FPLTQAR 1-76A), pursuant to 10 CFR 50.54(a)(3)(ii). The licensee proposes to remove organizational detail from its QA program description.

The licensee has committed in its QA topical to the following pertinent industry standards:

- American National Standards Institute (ANSI) N18.7-1976, "Administrative Controls and Quality Assurance Requirements for the Operational Phase of Nuclear Power Plants," as conditionally endorsed by Regulatory Guide (RG) 1.33, Revision 2
- ANSI 45.2-1971, "QA Program Requirements for Nuclear Power Plants," as endorsed by RG 1.28, 1972

2.0 EVALUATION

2.1 Basis of Evaluation

10 CFR 50, Appendix B, "Quality Assurance for Nuclear Power Plants and Fuel Reprocessing Plants," establishes QA requirements for the operation of nuclear power plant safety-related structures, systems, and components. Appendix B criteria are used for guidance in evaluating the adequacy of QA programs used by holders of operating licenses.

ANSI N18.7-1976 and ANSI 45.2-1971 have been endorsed by RG 1.33 and RG 1.28, respectively, as providing methods acceptable for complying with the Commission's regulations regarding overall QA program requirements. Section 3, "Owner Organization," of ANSI N18.7-1976 and Section 3, "Organization," of ANSI 45.2-1971 are the principal methods to which FPL has committed as a basis for Appendix B, Criterion 1, "Organization," compliance.

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This evaluation was performed in accordance with the guidance of NUREG-0800, the "Standard Review Plan" (SRP), which provides a well defined, uniform basis for evaluating proposed changes to license commitments. The acceptance criteria for evaluating changes to the licensee description of how the Criterion I organizational requirements are met is provided by SRP 17.1, and SRP 17.2.

2.2 Proposed Change

The licensee proposes to revise Section 1.0, "Organization," of the current QA topical, as indicated in Attachment B of the submittal. Section 1 of the QA topical currently describes the QA functional responsibilities of each of the following organizational elements:

1.3.1 *Nuclear Division*

- 1.3.1.1 *Plant Vice Presidents*
- 1.3.1.2 *Licensing and Special Programs*
- 1.3.1.3 *Nuclear Engineering*
- 1.3.1.4 *Nuclear Assurance*
- 1.3.1.5 *Nuclear Business Services*

1.3.2 *Support Departments*

- 1.3.2.1 *Corporate Records*
- 1.3.2.2 *Environmental Services*
- 1.3.2.3 *Protection & Control Systems*
- 1.3.2.4 *Information Management*

The licensee proposes to eliminate the descriptions of the functional responsibilities of these organizations. For the purpose of illustrating the extent of the revision, the Nuclear Engineering and Nuclear Assurance organizations are herein addressed.

Currently, the functional responsibilities of Nuclear Engineering (which includes Nuclear Engineering, Nuclear Fuel, Component Support and Inspections, and Reliability and Risk Assessment) are described on pages 13 through 16 of the QA topical (Attachment C of the submittal). The proposed revision reduces this description to:

"The Vice President Nuclear Engineering is responsible for nuclear plant design and engineering support."

Currently, the functional responsibilities of the site and corporate QA organizations are described on pages 17 through 22 of the QA topical (Attachment C of the submittal). The proposed revision reduces this description to:

"The Director Nuclear Assurance is responsible for verifying execution of the FPL Quality Assurance Program and initiating Quality Assurance policy and program changes when necessary."

SRP Acceptance Criterion IA6 states that the QA program description should describe the QA responsibilities of each of the organizational elements noted on the organization chart (Appendix A of the QA topical). The proposed revision does not satisfy this criterion. The regulatory basis for Acceptance Criterion IA6 is as follows:

Appendix B, Criterion I, "Organization," requires that:

"the authority and duties of persons and organizations performing activities affecting safety-related functions of structures, systems, and components shall be clearly established and delineated in writing. The quality assurance functions are those (a) assuring that an appropriate quality assurance program is established and effectively executed and (b) verifying, such as by checking, auditing, and inspection, that activities affecting the safety related functions have been correctly performed."

Provisions of ANSI N18.7-1976, Section 3.2, "Assignment of Authority and Responsibility," stipulate:

"Lines of authority, responsibility, and communication shall be established from the highest management level through intermediate levels to and including the onsite operating organization (including those offsite organizational units assigned responsibility for procurement, design, and construction, quality assurance, and technical support activities). These relations shall be documented and updated, as appropriate, in the form of organizational charts, functional descriptions of departmental responsibilities and relationships."

Provisions of ANSI N45.2-1971, Section 3, "Organization," stipulate:

"The organizational structure, functional responsibilities, levels of authority, and lines of internal and external communication for management, direction, and execution of the quality assurance program shall be documented. Where multiple organizational arrangements exist, the responsibility of each of organizational elements shall be clearly established."

2.3 Further Considerations

The licensee gives two reasons for the proposed change:

- (1) Over the years, organizational detail has been added to the QA program description to the point that it contains more information than necessary.
- (2) The proposed revision is similar to that contained in Section 1 of QA topicals approved for other licensees. The licensee identified Duke Power Company as having a similar QA topical.

Although these reasons do not constitute an adequate basis for the proposed reduction in commitment, they were considered as part of the evaluation.

To evaluate the assertion that the organizational detail has expanded over time, FPL's QA organizational description, effective in 1984, was compared with the current QA topical. Based on comparison, it is concluded that the level of detail has not, in fact, expanded over time.

To evaluate the assertion that the proposed reduction is comparable to that approved for other utilities, the organizational description in Duke Power's QA topical was compared to FPL's QA topical; it contains less detail than FPL's current organizational description, but contains more detail than the proposed revision. More to the point, however, Duke Power's topical description appears to be part of the original license basis and not the result of a reduction in QA program commitment.

3.0 CONCLUSIONS

Based on the evaluation above, the staff concludes that the proposed revision does not adequately satisfy the regulatory requirement to clearly delineate in writing the functional responsibilities of organizations performing activities on safety-related equipment. Therefore, the proposed revision is not acceptable.

REFERENCES

1. FPL QA Topical Report, Section 1.0, "Organization," dated June 10, 1984.
2. Duke Power Company QA Topical Report, *Duke-1A, Quality Assurance Program*, submitted by letter dated August 26, 1997.

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