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 AUTH. NAME AUTHOR AFFILIATION
 PERRY, J. A. Niagara Mohawk Power Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 GRIMES, B. K. Division of QA, Vendor & Technical Training Center Progra

SUBJECT: Submits responses to 851011 questions re QA organization, QA
 topical rept & QA program controls. Changes will be
 incorporated into next rev to QATR-1.

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November 5, 1985

Mr. Brian K. Grimes, Director
Division of Quality Assurance, Vendor
Technical Training Center Programs
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, DC 20555

RE: LETTER FROM B. K. GRIMES TO J. A. PERRY DATED OCTOBER 11, 1985

Dear Mr. Grimes:

I appreciate having had the opportunity to meet with the NRC staff in Bethesda on October 16, 1985 and discuss the items in the referenced letter. I felt the meeting was productive and beneficial. The following responses to the questions in the referenced letter reflect discussions during the October 16, 1985 meeting:

QUESTION: 1. Describe in more detail the specific responsibilities of the QA Supervisory position identified in the organization chart, Figure 1-1.

RESPONSE: NMPC-QATR-1 will be revised to add items 6, 7, 8, and 9 on Page 1-7 under Section 1.2.4.B as follows, and the organization chart (Figure 1-1, Page 1-9) will reflect the QA supervisors' positions as shown on Attachment 1.

6. Directing the QA Program Manager in the following activities:

- a. Developing QA Project Budgets/Decisions on QA Involvement on Specific Projects (Plant Outages-Modifications)
- b. Utilizing Matrix Management Concept to Secure:
 - Engineering QA Functions
 - Procurement QA Functions
 - Installation QA Functions
- c. Establishing QA Project Schedules and Interfaces
- d. Monitoring Assigned Projects and Issuing Status Reports
- e. Coordinating Project QA Problem Resolution
- f. QA Closeout of Projects

7. Directing the Quality Engineering Supervisor in the following activities:

- a. Site Operations Review Committee QA Representative
- b. Corrective Action Trending
- c. CAR Coordination
- d. NRC Correspondence and Comment Coordination
- e. Internal/External Reporting
- f. Training Coordination

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RESPONSE:

7. Continued:

g. Site Quality Engineering in Mechanical, Electrical, and I&C Disciplines to Perform:

- Procedure Reviews
- Procurement Document Reviews
- On-Site Contractor Monitoring
- Assisting Source Inspection
- Modification Support
- Material Review Board Member (NCRs)
- Modification Package Record Review

8. Directing the Operations Surveillance Supervisor in the following QA Surveillance areas:

- a. Site Operations Review Committee QA Representative
- b. Tech. Spec. - Operations
- c. Refueling
- d. Chemistry
- e. Radiation Control
- f. Training
- g. Security
- h. Emergency Preparedness
- i. Fire Protection
- j. Environmental Control

9. Directing the Quality Control Supervisor in the following areas:

- a. Inspection - Mechanical, Electrical, I&C Discipline
- b. Maintenance Support
- c. Receipt Inspection
- d. Management of QC Associated with Selected Outage Work
- e. Work Request Processing
- f. Assisting in Source Inspection
- g. Training/Certifying QC Inspectors
- h. NDE Procedure Development and Qualification
- i. Section XI - In-Service Inspection
- j. Maintenance Procedure Review
- k. Inspection Procedures and Checklist Development

QUESTION: 2. Describe criteria for determining the size of the QA organization including inspection staff.

RESPONSE:

NMPC-QATR-1 will be revised to add the following statement at the end of the third paragraph under Section 1.1 on Page 1-1:

The size of the QA Department is determined by the scope of operations activities and their importance to safety.



QUESTION: 3. Describe the management provisions for resolving disputes in quality arising from a difference of opinion between QA personnel and other departments (Engineering, Procurement, Manufacturing, and Operating Staff, etc.)

RESPONSE: NMPC-QATR-1 will be revised to add Item 7 to Section 1.2.4.A, Page 1-6 as follows:

7. Resolving with other levels of management any escalated disputes involving quality, arising from a difference of opinion between QA personnel and other department personnel.

QUESTION: 4. Describe in more detail the responsibilities of the QA organization in recommending and initiating stop work orders. Describe the extent of this responsibility as delineated in writing.

RESPONSE: NMPC-QATR-1 will be revised to add the following to Section 1.2.4.A.2, B.5, C.4 and D.7 on Pages 1-6 through 1-8:

This "Stop Work" authority is delineated in writing.

For Section 1.2.4.E5 on Page 1-8, the following statement will be added:

This authority is delineated in writing.

QUESTION: 5. Describe those provisions which assure designated QA individuals are involved in day-to-day plant activities important to safety (i.e. QA organization routinely attends and participates in daily plant work schedules and status meetings to assure they are kept abreast of day-to-day work assignments throughout the plant and that there is adequate QA coverage relative to procedural and inspection controls, acceptance criteria, and QA staffing and qualifications of personnel to carry out QA assignments).

RESPONSE: NMPC-QATR-1 will be revised to add Item 10 to Section 1.2.4.B, Page 1-7 as follows:

10. Assuring that representatives of the Quality Assurance organization on-site routinely attend and participate in work schedule and status meetings to keep abreast of day-to-day work assignments throughout the plant and to adequately cover and carry out QA assignments.

QUESTION: 6. Identify the structure, systems, and components and related consumables covered by the QA Topical Report or provide a reference to this material.

RESPONSE: NMPC-QATR-1 will be revised to add the following to the second sentence of Section 2.2.7 on Page 2-2:

. . . which are consistent with the FSAR commitments.



QUESTION: 7. Clarify the extent of development, control, and use of computer programs that will be under the control of the QA Topical Report.

RESPONSE: Refer to Section 3.2.3 Page 3-1 of NMPC-QATR-1.

QUESTION: 8. Clarify the extent that proficiency tests will be given to those personnel performing and verifying activities affecting quality and acceptance criteria are developed to determine if individuals are properly qualified.

RESPONSE: NMPC-QATR-1 Section 2.2.14.b, Page 2-4 will be revised to read as follows:

Proficiency tests are utilized where appropriate to determine that individuals can perform their assigned tasks.

QUESTION: 9. Describe the methodology for assuring and verifying that the quality-related controls committed to in the QA Topical including the Regulatory Guides and NQA-1 and 2 are properly translated into implementing procedures and instructions.

RESPONSE: NMPC-QATR-1, Section 5.1, Page 5-1, will be revised to add the following:

Commitments contained in Appendices A and B of this QA Topical Report have been translated into procedural matrices to assure that implementing procedures cover the QA commitments.

QUESTION: 10. Describe those provisions which assure that when the designer's immediate supervisor performs a verification that he is the only technically qualified individual to perform the verification, that the need is individually documented and approved in advance by the supervisor's management, and that QA audits cover frequency and effectiveness of use of supervisors as design verifiers to guard against abuse.

RESPONSE: NMPC-QATR-1 Section 3.2.11, Page 3-3 will be revised and Section 18.2.6.h, Page 18-2 will be added as follows:

3.2.11 Persons representing applicable technical disciplines are assigned to perform design verifications. These persons are qualified by appropriate education or experience and are not directly responsible for the design being verified. This verification may be performed by the originator's supervisor, provided that:

1. The supervisor did not specify a singular design approach or rule out certain design considerations, and



RESPONSE: 10. Continued:

2. The supervisor did not establish the design inputs used in the design.

OR

1. The supervisor is the only individual in the organization competent to perform the verification, and

2. The supervisor receives written approval by the appropriate Engineering Manager.

18.2.6.h Activities associated with design verification performed by designers' immediate supervisor.

QUESTION: 11. Clarify the extent the procurement of spare and replacement parts will be subject to the present QA Program controls.

RESPONSE: Reference NMPC-QATR-1, Section 7.2.5, Page 7-2.

QUESTION: 12. Describe those provisions which assure that items accepted and released are identified as to their inspection status prior to forwarding them to controlled storage area or releasing them for installation or further work.

RESPONSE: Reference NMPC-QATR-1, Section 7.2.7, 7.2.8, and 7.2.9, Page 7-2.

QUESTION: 13. Describe those provisions which assure that suppliers furnish the following records to the purchaser:

- a. Documentation that identifies purchase items and the specific procurement requirements (e.g. codes, standards, and specifications) met by the items.
- b. Documentation identifying any procurement requirements that have not been met.
- c. A description of the nonconformances from the procurement requirements dispositioned accept-as-is or repair.

RESPONSE: Reference NMPC-QATR-1, Section 4.2.6.a, b, and c, Page 4-2.

QUESTION: 15. Before a detailed request for additional information is provided concerning your commitment to NQA-1 and -2, Regulatory Guides and other ANSI standards including the interpretations and exceptions, we believe it appropriate to meet with Niagara Mohawk QA personnel to discuss the overall QA program controls and your intent in complying with NQA-1 and -2.



RESPONSE: 15. This item was discussed in some detail during the October 16, 1985 meeting with NRC staff. During subsequent conversation between G. T. Ankrum and J. A. Perry on October 28, we were requested not to respond to Question 15 pending receipt of more specific questions from the NRC.

On November 1, we received additional clarification concerning Question 15 from J. W. Gilray of the NRC. Currently these additional five (5) items are undergoing review. Our response to these items will be transmitted to the NRC by separate correspondence in the near future.

The responses to Questions 1 through 6, 8, 9, and 10 indicate changes to be made to NMPC-QATR-1. These changes will be incorporated at the time of the next revision to QATR-1.

Your prompt and complete review and approval of NMPC-QATR-1 would be greatly appreciated. Should you have any questions, please do not hesitate to notify us.

Very truly yours,


James A. Perry
Director - Quality Assurance

JAP:jan

cc: G. T. Ankrum - U.S. NRC
Dr. P. Eapen - U.S. NRC Region I
R. A. Gramm - U.S. NRC Sr. Resident Inspector
J. W. Gilray - U.S. NRC
S. Hudson - U.S. NRC Sr. Resident Inspector

T. E. Lempges - NMPC
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