

Public Service
Electric and Gas
Company

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Vice President and Chief Nuclear Officer

SEP 27 1994

NLR-N94156

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

**PROPOSED REVISIONS TO THE
QUALITY ASSURANCE PROGRAM
HOPE CREEK AND SALEM GENERATING STATIONS
FACILITY OPERATING LICENSE NOS. NPF-57, DPR-70 AND DPR-75
DOCKET NOS. 50-354, 50-311 AND 50-272**

In accordance with 10 CFR 50.54(a)(3), Public Service Electric & Gas is proposing to revise the Quality Assurance (QA) Program contained in Section 17.2 of the Updated Final Safety Analysis Report (UFSAR) for both Hope Creek and the Salem Generating Stations.

The proposed changes revise the responsibility of the Manager - Quality Assurance (QA) Programs and Audits. Specifically, the responsibility of the Manager - QA Programs and Audits would be revised so that assessments of QA Program administrative and implementing procedures can be performed. The proposed changes would allow for a more effective evaluation of QA Program administrative and implementing procedures, with focus on process requirements. In addition, associated changes which add clarification to the UFSARs are also included.

A description of the proposed changes, reason and the basis for concluding that the revised QA Program incorporating the proposed changes continue to satisfy the criteria of 10 CFR 50 Appendix B and the UFSAR QA Program description commitments previously accepted by the NRC are provided in Attachment 1. The UFSAR pages affected by the proposed change are marked-up in Attachment 2.

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Should you have any questions regarding this request, we will be pleased to discuss them with you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Steven E. Matthews". The signature is written in dark ink and is positioned below the word "Sincerely,".

Attachments (2)

C See next page

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ATTACHMENT 1
PROPOSED CHANGES TO THE QUALITY ASSURANCE PROGRAM

PROPOSED REVISIONS TO THE
QUALITY ASSURANCE PROGRAM
HOPE CREEK AND SALEM GENERATING STATIONS
FACILITY OPERATING
LICENSE NOS. NPF-57, DPR-70 AND DPR-75
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I. DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes revise the responsibility of the Manager - Quality Assurance (QA) Programs and Audits, henceforth referred to as the Manager of QA. Specifically, the responsibility of the Manager of QA would be revised so that assessments of QA Program administrative and implementing procedures can be performed. The proposed changes would allow for a more effective evaluation of QA Program administrative and implementing procedures, with focus on process requirements. In addition, associated changes which add clarification to the UFSARs are also included. The changes are marked-up in Attachment 2 and are as follows:

A. Section 17.2.1.1.1 Quality Assurance

Renumber the responsibilities of the Manager of QA from 2 through 7 to 3 through 8.

Add a new responsibility number 2 as follows:

"Review of the Nuclear
Administrative Procedures Manual."

Revise responsibility number 3 as follows:

"Perform assessments of PSE&G QA
Program administrative and
implementing procedures (as
necessary, these assessments may
also include station administrative
and implementing procedures)."

B. Section 17.2.3 Design Control

Replace the phrase:

"The Nuclear Department Engineering Manual (NDEM) procedures, concurred with by the QA organization,"

with the phrase:

"The Nuclear Department Engineering Manual (NDEM) procedures"

Add the following sentence:

"QA will conduct periodic engineering process assessments which include procedures contained in the NDEM."

II. REASONS FOR THE CHANGES

The proposed changes have been categorized into two groups. The first group contains the changes which revise the responsibility of the Manager of QA. This is a revision to current commitments contained in the Quality Assurance Description Report of Section 17.2 of the UFSARs, and is evaluated as such herein. The second category represents changes which add clarification to the UFSARs as a result of the proposed changes.

Proposed Revisions to UFSAR Commitments

In part, Section 17.2.1.1.1 of the Hope Creek and Salem Generating Station UFSARs indicate that the responsibility of the Manager of QA is to review and approve QA Program implementing procedures. Although not specifically noted in the UFSARs, the Manager of QA also reviews and approves QA Program administrative procedures. As part of the proposed changes, this clarification is being added so the UFSARs reflect current activities of the Manager of QA.

Currently, the Manager of QA reviews and approves QA Program administrative and implementing procedures to

ensure compliance with the Operational Quality Assurance Program, as described in Section 17.2 of the UFSARs (this responsibility does not include review and approval of station QA Program administrative and implementing procedures, the Manager of Station QA performs this function). Review and approval of the QA Program administrative and implementing procedures is met by this activity.

As part of a QA self assessment, the effectiveness of the review and approval of QA Program implementing and administrative procedures by the Manager of QA was examined. The QA self assessment determined that a more effective evaluation of the QA Program administrative and implementing procedures would be obtained if assessments replaced the review and approval functions. As a result of this evaluation, the responsibility of the Manager of QA is proposed to be revised so that assessments of QA Program administrative and implementing procedures may be performed. Assessments would allow a more effective evaluation of QA Program administrative and implementing procedures, with focus on process requirements.

For consistency with the above changes, UFSAR Sections 17.2.3 Design Control are being revised. Currently, Sections 17.2.3 indicate that Nuclear Department Engineering Manual (NDEM) procedures are concurred with by the QA organization (i.e., the Manager of QA). However, QA Program implementing and administrative procedures are included in the NDEM procedures. Therefore, for consistency, the proposed changes replace QA concurrence with QA assessments.

Clarification Changes

The PSE&G Nuclear Department procedure hierarchy system is composed of four levels, Nuclear Department procedures, Major Department procedures, Functional Unit procedures and Supplemental Documents. Administrative procedures exist at both the Major Department and the Functional Unit levels. Implementing procedures exists at the Functional Unit level.

The above changes clarify the UFSARs to reflect current practice of the Manager of QA by adding the responsibility of assessing QA Program administrative procedures. These administrative procedures are on the Functional Unit level. However, the Manager of QA also reviews Major Department administrative procedures (i.e., the Nuclear Administrative Procedures Manual) with approval provided by the General Manager of Plant Operations as indicated in UFSAR Sections 13.5.1 and 13.5.1.1 for the Hope Creek and Salem Generating Station UFSARs, respectively. Consequently, a clarification is being added as part of the proposed changes so that these activities remain distinguished.

As an additional change, the responsibility of the Manager of QA has been clarified so that assessments of Salem and Hope Creek Station QA Program administrative and implementing procedures may also be performed, as necessary.

In accordance with 10 CFR 50.54(a)(3)(ii), only changes which reduce commitments require a basis. The above changes are not considered a reduction in commitments and as such, no basis is provided.

III. BASIS FOR CHANGES

In accordance with the requirements of 10CFR50.54(a)(3)ii, the proposed revisions to the QA Program have been reviewed to determine if the changes continue to satisfy the criteria of 10CFR50 Appendix B and the UFSAR QA Program description commitments previously accepted by the NRC. The results of this review are as follows:

Criterion of 10CFR50 Appendix B

The proposed changes were reviewed against the criteria of 10CFR50, Appendix B. As a result of this review, it was determined that the proposed changes will have no affect on the ability to satisfy the criteria of 10CFR50, Appendix B.

UFSAR QA Program Commitments

The proposed revisions would allow the Manager of QA to perform assessments of QA Program administrative and implementing procedures. Assessments would allow a more effective evaluation of QA Program administrative and implementing procedures, with focus on process requirements. Assessments allow the Manager of QA to evaluate process requirements for preparing, reviewing, revising and issuing QA Program administrative and implementing procedures.

IV. CONCLUSION

The proposed changes would revise the responsibility of the Manager of QA to allow assessments of QA Program implementing and administrative procedures. These changes would allow a more effective evaluation of the QA Program administrative and implementing procedures. These proposed changes will have no affect on the ability to satisfy the criteria of 10CFR50 Appendix B and the UFSAR QA Program description commitments previously accepted by the NRC.

ATTACHMENT 2
PROPOSED REVISIONS TO THE
QUALITY ASSURANCE PROGRAM
HOPE CREEK AND SALEM GENERATING STATION
FACILITY OPERATING LICENSE NOS. NPF-57, DPR-70 AND DPR-75
DOCKET NOS. 50-354, 50-311 AND 50-272

17.2.1.1.1 Quality Assurance

The General Manager - Quality Assurance/Nuclear Safety Review (QA/NSR) is responsible for defining, formulating, implementing, and coordinating the QA program. He has been delegated the authority and has the independence to interpret quality requirements, identify quality problems and trends, and provide recommendations or solutions to quality problems. He is responsible for approval of the QA/NSR Department Manual used during the operations phase of the nuclear stations. He also is responsible for assuring compliance with established requirements for the QA program through document review, inspection, monitoring, and audit. QA provides a centralized coordinating function for QA/QC activities applied to the operation phase.

The General Manager - QA/NSR has the authority and responsibility to stop work through the issuance of a stop work order, when significant conditions adverse to quality require such action.

The PSE&G policies and organization structure assure that the General Manager - QA/NSR has sufficient organizational freedom and independence to carry out his responsibilities.

Responsibilities of the Manager-QA Programs and Audits include the following:

1. Preparation and maintenance of the QA/NSR organization manual, the QA Program description in the UFSAR and the Operational QA Program description in the Nuclear Administrative Procedures Manual.
3. ~~2.~~ ~~Review and approval~~ of PSE&G QA Program implementing procedures. administrative and
4. ~~3.~~ Development and implementation of the QA Audit Program.

2. Review of the Nuclear Administrative Procedures Manual.

5. 4. Conducting QA Program orientation for Nuclear Department personnel, administering the training and certification program for QA personnel involved in inspection and auditing activities, maintaining the QA training plan, and maintaining QA training records.
6. 6. Review of new regulatory requirements for QA program impact.
7. 7. Development and implementation of a trend analysis program to identify quality problems.
8. 8. Coordination of the commitment verification program on a selected basis.

Responsibilities of the Manager - QA Engineering and Procurement include:

1. Review of engineering documents such as equipment specifications, weld procedures, etc, for inclusion of QA requirements.
2. Review of specifications for inclusion of QA requirements.
3. Review of procurement documents for insertion of applicable QA requirements.
4. Conduct of supplier surveys, audits, and surveillances.
5. Performing supplier evaluation.
6. Performing material evaluation activities on items subject to the QA Program.

The Manager - Station Quality Assurance reports to the General Manager - QA/NSR, as shown on Figure 17.2-1. His responsibilities include implementation of the inspection

Training programs of supporting organizations are described in their manuals, which are required to comply with the QA program.

The Nuclear Training Center is responsible for the licensed operator training and retraining, in addition to other technical and supervisory training programs. General Employee Training, which is required for all personnel having access to the station, is the responsibility of the Site Protection Department.

17.2.3 Design Control

The scope of the design control program includes design activities associated with the preparation and review of design documents, including the correct translation of applicable regulatory requirements into design modification, procurement, and procedural documents.

The design control program includes activities such as field design engineering, associated computer programs, compatibility of materials, and accessibility for inservice inspection, maintenance, and repair.

During the operations phase, issuance of new drawings and revisions to existing drawings require the implementation of a design change. The term design change as used throughout this document, shall apply to both design and configuration changes.

The Nuclear Department Engineering Manual (NDEM) procedures, ~~conceded with by the QA organization,~~ provide implementation guidance for the intent of Regulatory Guide 1.64, "Quality Assurance Requirements for the Design of Nuclear Power Plants." The NDEM procedures are used by all PSE&G organizations (e.g., Station Technical Department, E&PB) conducting engineering activities.

QA will conduct periodic engineering process assessments which include procedures contained in the NDEM.

2. An annual assessment of the QA program is preplanned and documented. This assessment addresses the scope, status, and adequacy of the QA program. Corrective action is identified and tracked.

17.2.1.1.1 Quality Assurance

The General Manager - Quality Assurance/Nuclear Safety Review (QA/NSR) is responsible for defining, formulating, implementing, and coordinating the QA program. He has been delegated the authority and has the independence to interpret quality requirements, identify quality problems and trends, and provide recommendations or solutions to quality problems. He is responsible for approval of the QA/NSR Department Manual to be used during the operations phase of the nuclear stations. He also is responsible for assuring compliance with established requirements for the QA program through document review, inspection, monitoring, and audit. QA provides a centralized coordinating function for QA/QC activities applied to the operations phase.

The General Manager - QA/NSR has the authority and responsibility to stop work, through the issuance of a Stop Work Order, when significant conditions adverse to quality require such action.

The PSE&G policies and organization structure assure that the General Manager - QA/NSR has sufficient organizational freedom and independence to carry out his responsibilities.

Responsibilities of the Manager - QA Programs and Audits include the following:

1. Preparation and maintenance of the QA organization manual, the QA Program description in the UFSAR, and the Operational QA Program description in the Nuclear Administrative Procedures Manual.

3. ~~Review and approval~~ of PSE&G QA Program implementing procedures.

(as necessary, these assessments may also include station administrative and implementing procedures)

17.2-4
Revision 11
July 22, 1991

2. Review of the Nuclear Administrative Procedures Manual.

Administrative and

4. ~~3~~. Development and implementation of the QA Audit Program.
5. ~~4~~. Conducting QA Program orientation for Nuclear Department personnel, administering the training and certification program for QA personnel involved in inspection and auditing activities, maintaining the QA training plan, and maintaining QA training records.
6. ~~5~~. Review of new regulatory requirements for QA program impact.
7. ~~6~~. Development and implementation of a trend analysis program to identify quality problems.
8. ~~7~~. Coordination of the commitment verification program on a selected basis.

Responsibilities of the Manager - QA Engineering and Procurement include:

1. Review of engineering documents such as equipment specifications, weld procedures, etc, for inclusion of QA requirements.
2. Review of specifications for inclusion of QA requirements.
3. Review of procurement documents for insertion of applicable QA requirements.
4. Conduct of supplier surveys, audits, and surveillances.
5. Performing supplier evaluation.
6. Performing material evaluation activities on items subject to the QA Program.

materials, and accessibility for inservice inspection, maintenance, and repair.

During the operations phase, issuance of new drawings and revisions to existing drawings require the implementation of a design change. The term design change, as used throughout this document, shall apply to both design and configuration changes.

The Nuclear Department Engineering Manual (NDEM) procedures ~~concurrent with by the QA organization~~, provide implementation guidance for the intent of Regulatory Guide 1.64, "Quality Assurance Requirements for the Design of Nuclear Power Plants." The NDEM procedures are used by all PSE&G organizations (e.g., Station Technical Department, E&PB) conducting engineering activities.

The Engineering and Plant Betterment (E&PB) Department has the following responsibilities:

QA will conduct periodic engineering process assessments which include procedures contained in the NDEM.

1. Prepare and update detailed engineering and design documents, including drawings and specifications, for all systems, components, and structures.
2. Specify applicable codes, standards, regulatory and quality requirements acceptance standards, and other design input in design documents.
3. Identify systems, components, and structures that are covered by the quality assurance program.
4. Perform design verification for systems, components, and structures covered by the QA Program.
5. Perform safety evaluations of proposed design changes, as required.
6. Prepare documents for procurement of equipment, materials, and components.