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FROM: Florida Power & Light Co  
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DESCRIPTION

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PLANT NAME: St Lucie #2  
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ENCLOSURE

Reformat of Quality Assurance Program Description re FELTQAR 1-76A for use during construction design & operation,.....

10P

**40 ENCL. 10 REPRODUCED**

FOR ACTION/INFORMATION

ASSIGNED AD: (LTR)	<b>VASSALLO</b>
BRANCH CHIEF:	<b>KNIEL</b>
PROJECT MANAGER: (2)	<b>BIRKEL / TIBBETTS</b>
LICENSING ASST: (LTR)	<b>LEE</b>

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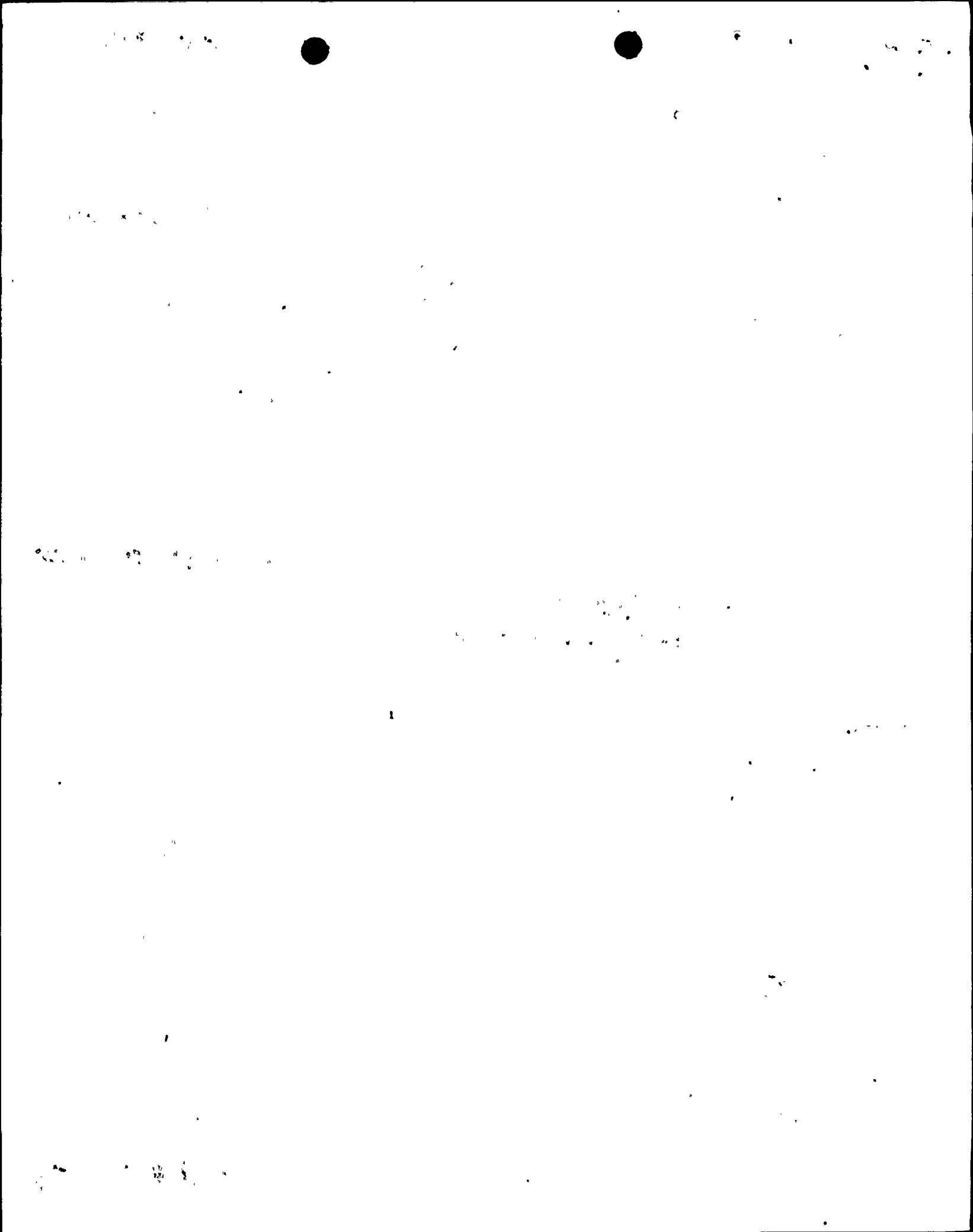
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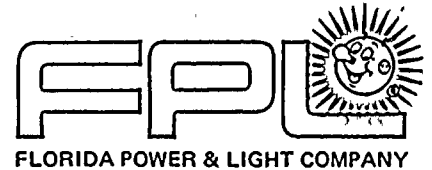
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LPDR: <b>FT. PIERRE FLA.</b>
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# REGULATORY DOCKET FILE COPY

September 9, 1977  
L-77-286

Office of Nuclear Reactor Regulation  
Attn: Mr. Roger S. Boyd, Director  
Division of Project Management  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Dear Mr. Boyd:

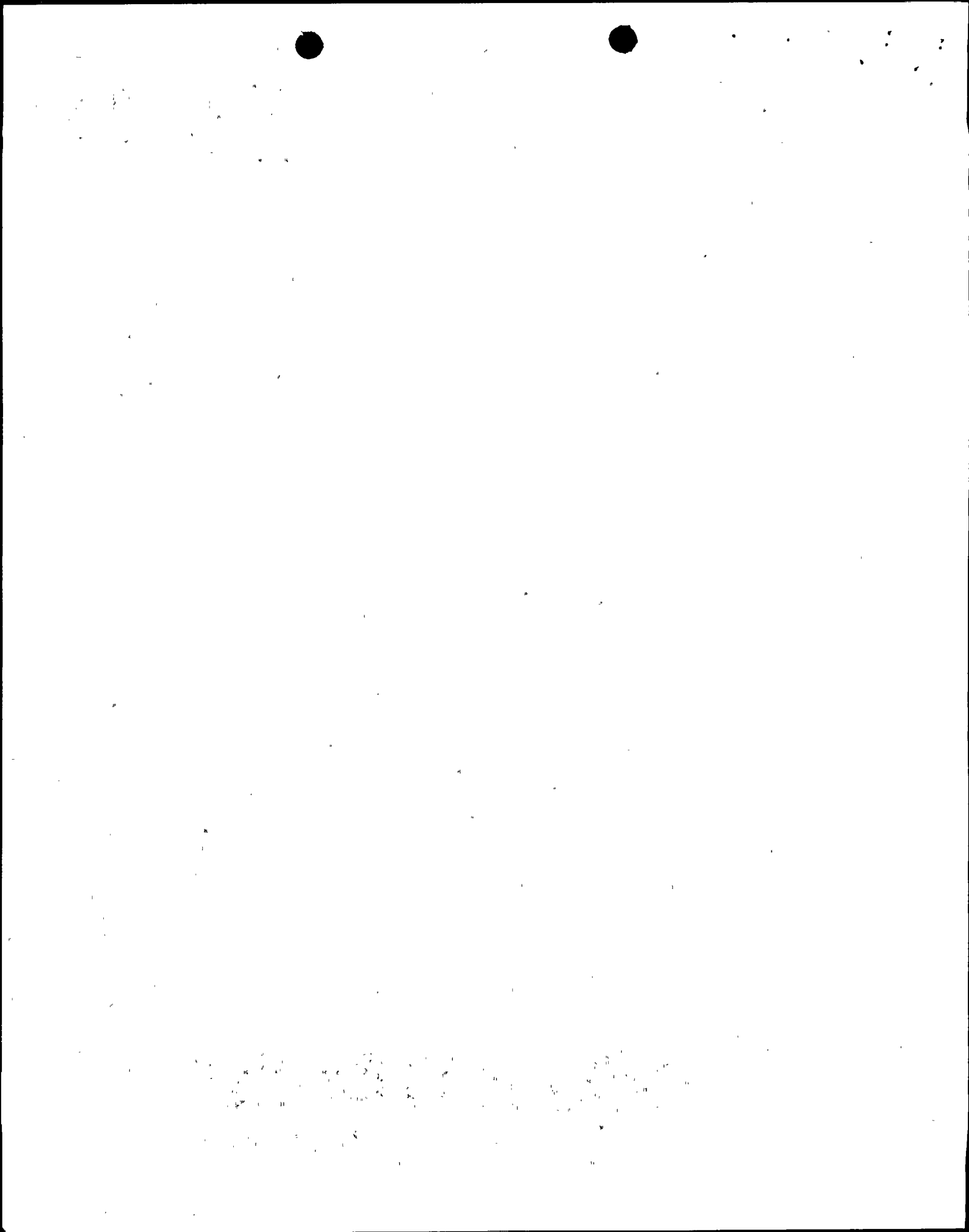
Re: St. Lucie Plant Unit No. 2  
Docket No. 50-389  
Quality Assurance Program

The Florida Power & Light Company Topical Quality Assurance Report (FPLTQAR 1-76A) describes a generic Quality Assurance Program for all existing and future nuclear generating stations at Florida Power & Light. This report has been reviewed by the Nuclear Regulatory Commission and has received its approval. Our intent to ultimately apply the Topical QA Report to St. Lucie Unit No. 2 has been stated in the report, and the desirability of doing this has been expressed previously by members of your staff. In accordance with our policy of utilizing the Topical QA Report where appropriate, we are herewith submitting a reformat of the Quality Assurance Program description for QA activities during design, construction and operation for St. Lucie Unit No. 2 (PSL-2).

The PSL-2 Quality Assurance Program is described in the attachment to this letter, which specifically addresses details applicable only to PSL-2, and the Topical Quality Assurance Report (FPLTQAR 1-76A). In combination, these documents are responsive to the "Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants," and are, therefore, being implemented in place of the existing information in Chapter 17 of the PSL-2 Preliminary Safety Analysis Report. As described below, this represents an augmentation of the existing program for PSL-2. These documents will be incorporated by reference into Chapter 17 of the PSL-2 Final Safety Analysis Report.

It is FPL's policy to have direct control of quality-related activities where possible. In keeping with this policy, we had previously assumed control of the audit, inspection, and verification functions on site in the area of construction. This increased responsibility was determined to be satisfactory to the NRC staff as discussed in Supplement 1 to the St. Lucie Unit 2 Safety Evaluation Report. Florida Power & Light is now additionally assuming direct responsibility for all site construction activities, with the exception of design engineering and craft labor relations which will continue to be the responsibility of Ebasco Services, Inc. Under this

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Office of Nuclear Reactor Regulation  
Attn: Mr. Roger S. Boyd, Director  
Division of Project Management  
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organization, the responsible job-site individual will be a Florida Power & Light Company representative. All quality-related site activities will be performed under the guidance of the FPL Topical QA Report. The off-site and Combustion Engineering functions will continue to be performed as specified in the PSL-2 PSAR.

Very truly yours,



Robert E. Uhrig  
Vice President

REU/LLL:ltm  
Attachment

cc: J. P. O'Reilly, Region II  
C. J. Heltemes  
Robert L. Lowenstein, Esq.  
M. H. Hodder, Esq.

## ST. LUCIE UNIT 2

### QUALITY ASSURANCE

#### 1.0 GENERAL

The overall organization chart for the St. Lucie project is shown on Figures 1 and 2.

#### 2.0 FLORIDA POWER & LIGHT (FPL) QUALITY ASSURANCE DURING DESIGN AND CONSTRUCTION

The generic elements of the FPL Quality Assurance Program are described in the FPL Topical Quality Assurance Report (FPLTQAR 1-76A). The Topical QA Report defines departmental responsibilities by which FPL implements the corporate QA Program and is an integral part of the corporate Quality Assurance Manual (FPL-NQA-100). Additionally, the FPL Topical Quality Assurance Report defines the guidance documents the QA Program follows.

The following additional information and exceptions are applicable to the St. Lucie Unit 2 Project.

##### a. FPL Construction Quality Control Organization.

The FPL On-Site Construction Quality Control organization is shown in Figure 3.

The function and responsibilities of the Area Quality Control Supervisors and Quality Control Supervisor (Receipt Inspection) are:

Assure that all construction in the Quality Control Supervisor's assigned area (mechanical, electrical, civil or receipt inspection) is completed in accordance with the approved procedures. This includes coordination with the on-site contractors in the scheduling of inspections, ensuring adequate completion of inspections and inspection documentation and technical direction for assigned QC personnel. The Area Quality Control Supervisor recommends Stop Work to the Project Quality Control Supervisor if the situation dictates.

##### b. Procurement Document Control.

During the construction phase, FPL delegates to the Architect Engineer and the NSSS Supplier the responsibility for ensuring that correct technical and quality requirements are incorporated into procurement documents for items they procure. FPL will perform the field procurement functions in accordance with TOR 4.0 and 7.0 of the FPLTQAR.

c. Control of Special Processes.

During plant construction the FPL Construction organization will be responsible for welding control. This includes review of procedures, inspection, qualification of welders and welding operations and weld material control.

During construction, the FPL Construction Quality Control Organization is responsible for the approval and qualification of NDE procedures and assuring qualification and certification of NDE personnel.

d. Inspection.

During construction, the FPL On-Site Construction Quality Control organization performs on-site receiving in-process and final inspections in accordance with TQR 10.0 of the FPLTQAR.

e. Test Control.

The FPL Test Control Program for construction is described in TQR 11.0 of the FPLTQAR.

f. Control of Measuring and Test Equipment.

During construction, the FPL On-Site Construction Quality Control organization is responsible for the control, calibration and maintenance of measuring and test equipment in accordance with TQR 12.0 of the FPLTQAR.

g. Handling, Storage and Shipping.

During construction, the FPL Stores Department is responsible for on-site handling, storage, disbursal from stores, and shipping of stored items, in accordance with TQR 8.0 and 13.0 of the FPLTQAR.

h. Nonconforming Materials, Parts and Components.

During construction, the FPL On-Site Construction Quality Control organization controls nonconforming materials, parts and components as described in TQR 15.0 of the FPLTQAR.

i. Quality Assurance Records.

During construction, FPL is responsible for the receipt, review, and storage of QA records retained on-site in accordance with TQR 17.0 of the FPLTQAR. FPL QA Construction has responsibility as custodian of all QA records on-site until turned over to operating personnel. The responsibility for retention of off-site design and procurement records is delegated to the Architect-Engineer and NSSS supplier and maintained in accordance with TQR 17.0.

ST. LUCIE UNIT 2  
QUALITY ASSURANCE  
PAGE Three

j. Audits.

During construction, the FPL Quality Assurance Department is responsible for conducting an audit program as specified in TOR 18.0 of the FPLTQAR including the audit of all on-site quality related activities.



## QUALITY ASSURANCE DURING THE OPERATIONS PHASE

The generic elements of the FPL Quality Assurance Program are described in the FPL Topical Quality Assurance Report (FPLTQAR). The Topical QA Report defines departmental responsibilities by which FPL implements the Corporate QA Program, and is an integral part of the Corporate Quality Assurance Manual (FPL-NQA-100). Additionally, the FPL Topical Quality Assurance Report defines the guidance documents the QA Program follows. The Topical Quality Assurance Report is, therefore, referenced by this letter, and only information which is in addition to that found in the Topical QA Report is contained herein.

### 1.0 ORGANIZATION

The FPL organizational structure, including the Plant Manager, is described in the FPL Topical Quality Assurance Report (TQR 1.0). The St. Lucie Unit 2 Plant staff organization below the Plant Manager is shown in Figure 4 attached.

#### Plant Manager

The Plant Manager has the direct responsibility for implementing Quality Assurance requirements for the Power Resources Department at the St. Lucie Unit 2 Plant.

#### Quality Control Supervisor

The Plant Quality Control Supervisor is responsible for planning and administering the Plant Quality Control Program which comprises inspection, monitoring, and surveillance of quality-related Power Resources activities on site.

Lines of communication between the Quality Control Supervisor and the plant staff have not been indicated in Figure 4 because the Quality

Control Supervisor has the authority and freedom to communicate with all levels of the plant staff and line management involved with activities affecting the quality of nuclear safety-related structures, systems, and components. The Quality Control Supervisor reports to the Plant Manager and has sufficient authority to stop nonconforming work or operations.

Additional responsibilities of the Quality Control Supervisor include:

- a) providing guidance in the interpretation of federal regulations related to the Quality Assurance Program, and provide guidance in other administrative requirements involving quality assurance activities;
- b) serving as the plant interface with the Quality Assurance Department and Nuclear Regulatory Commission inspectors;
- c) tracking plant nonconformances, inspection and audit open items;
- d) advising plant management, including the Plant Manager if necessary, of the need for timely corrective action;
- e) maintaining adequate records of quality-related site activities;
- f) and distributing and controlling plant procedures, instructions, and approved drawings.

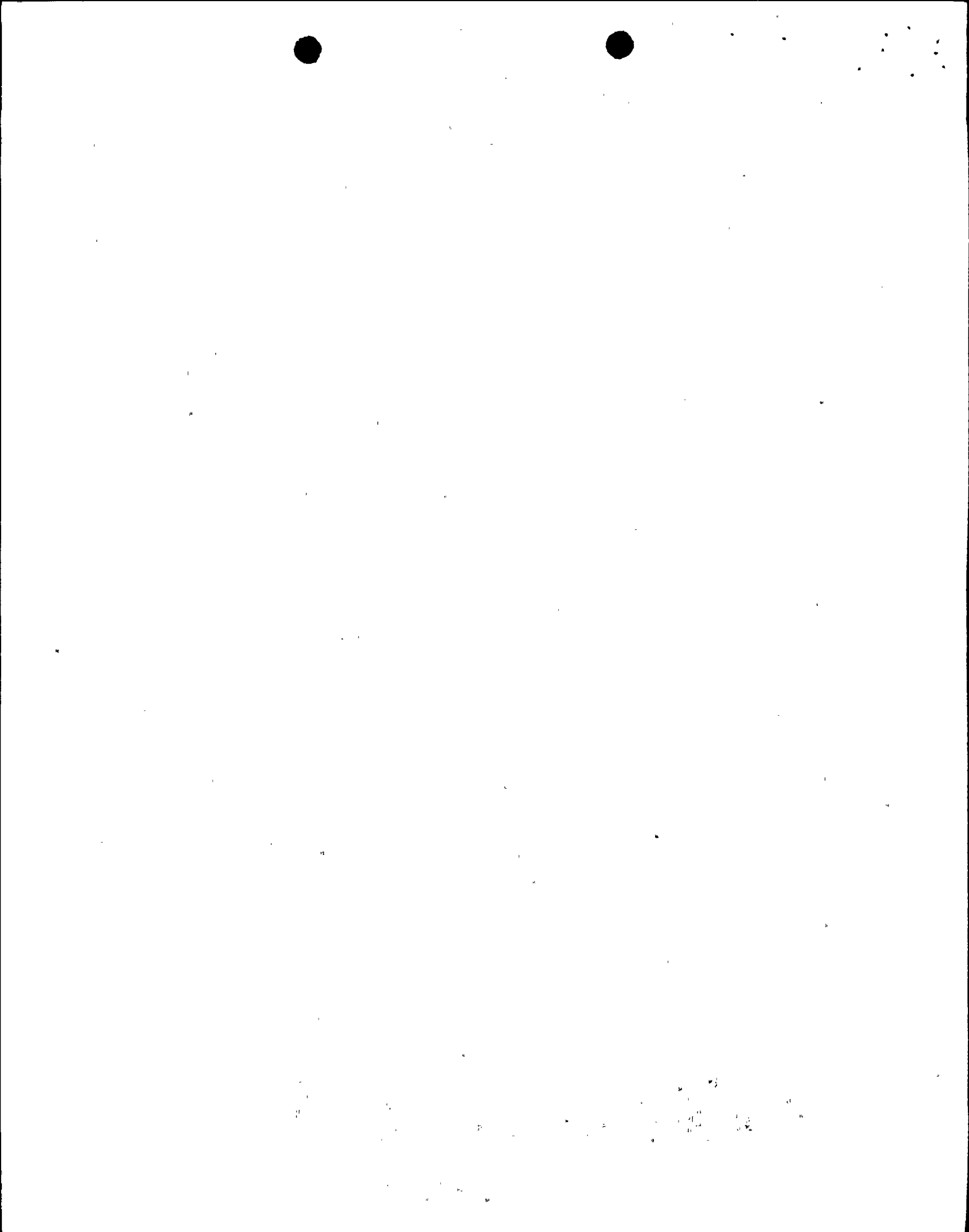
Plant Quality Control Department engineers and inspectors receive functional and administrative direction from the Quality Control Supervisor. In addition to members of the Quality Control Department, experienced individuals in other plant departments who are qualified and certified as Quality Control inspectors, may function in a Quality Control role. When so functioning, the individuals do not perform or directly supervise the performance of the activity being inspected.

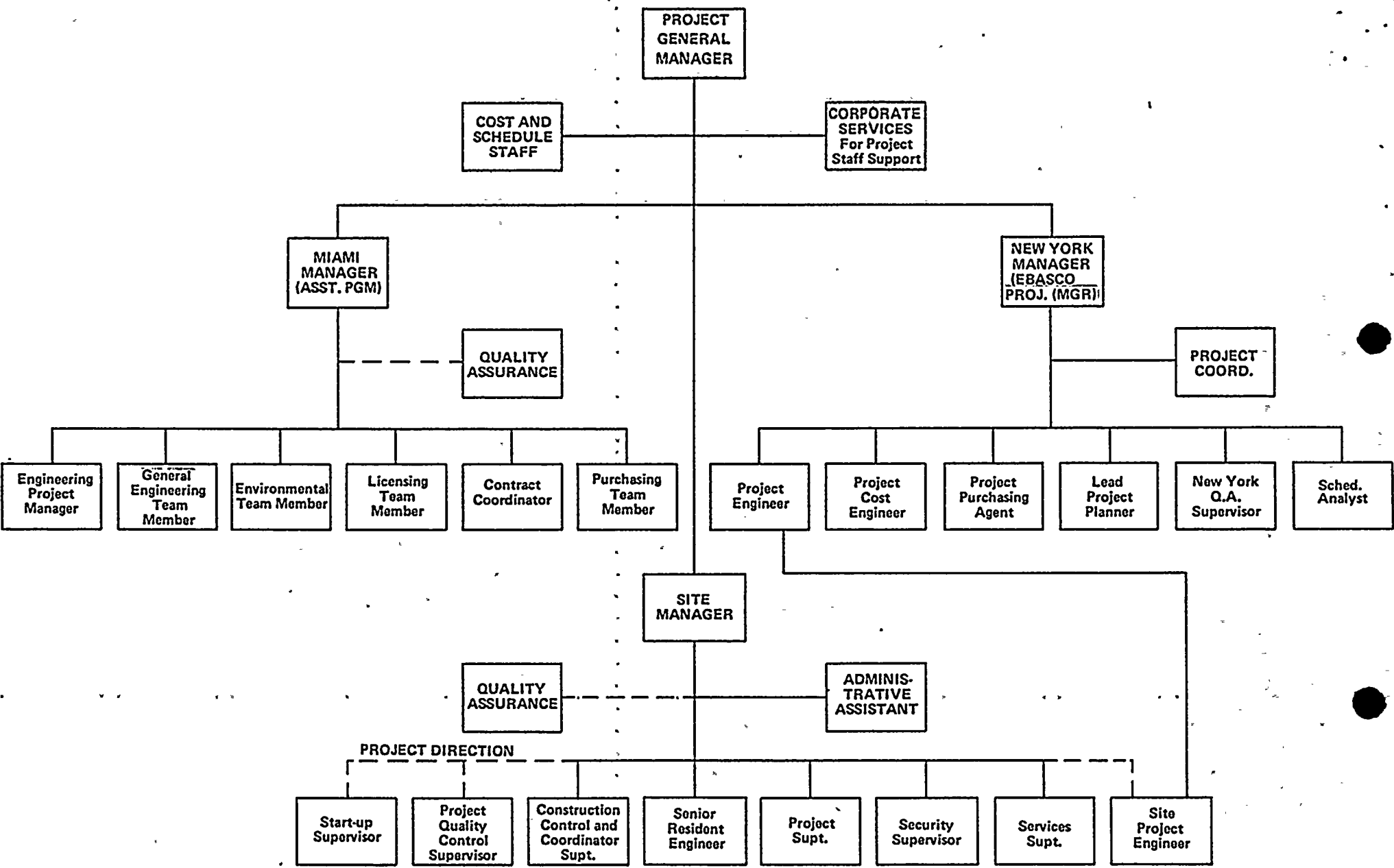
## 16.0 CORRECTIVE ACTION

The controls which assure timely corrective action of open items identified by the Quality Assurance Department, and unresolved items and items of non-compliance identified by the Nuclear Regulatory Commission, are described in the FPL Topical Quality Assurance Report (TQR 16.0).

Plant corrective action tracking of nonconformance and audit or inspection open items, including items identified during Plant Quality Control inspections, are documented and tracked in accordance with Plant Administrative Procedures. These Administrative Procedures require that Quality Control inspections are performed, using inspection forms or checklists approved by the Quality Control Supervisor, with inspection results reported to the Quality Control Supervisor.

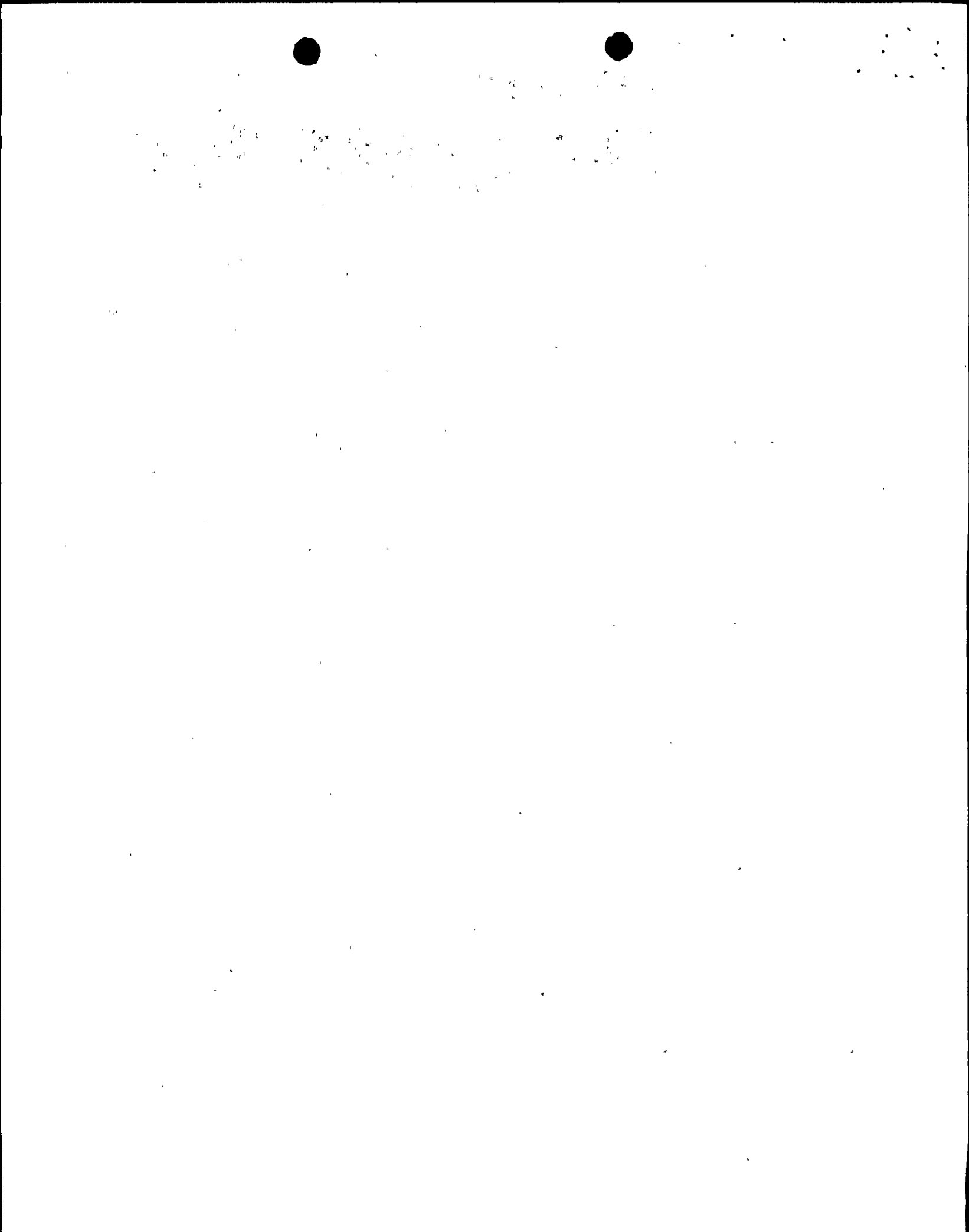
Open items against the Plant, from all inspection sources, are tracked by the Plant Quality Control Department, which transmits periodic status reports of all open items to the Plant Manager and Plant personnel responsible for corrective action. In addition, Plant Quality Control performs open item follow-up activities to obtain corrective action commitments and obtain the status of open commitments. This tracking activity does not end until the corrective action committed to, has been accomplished.

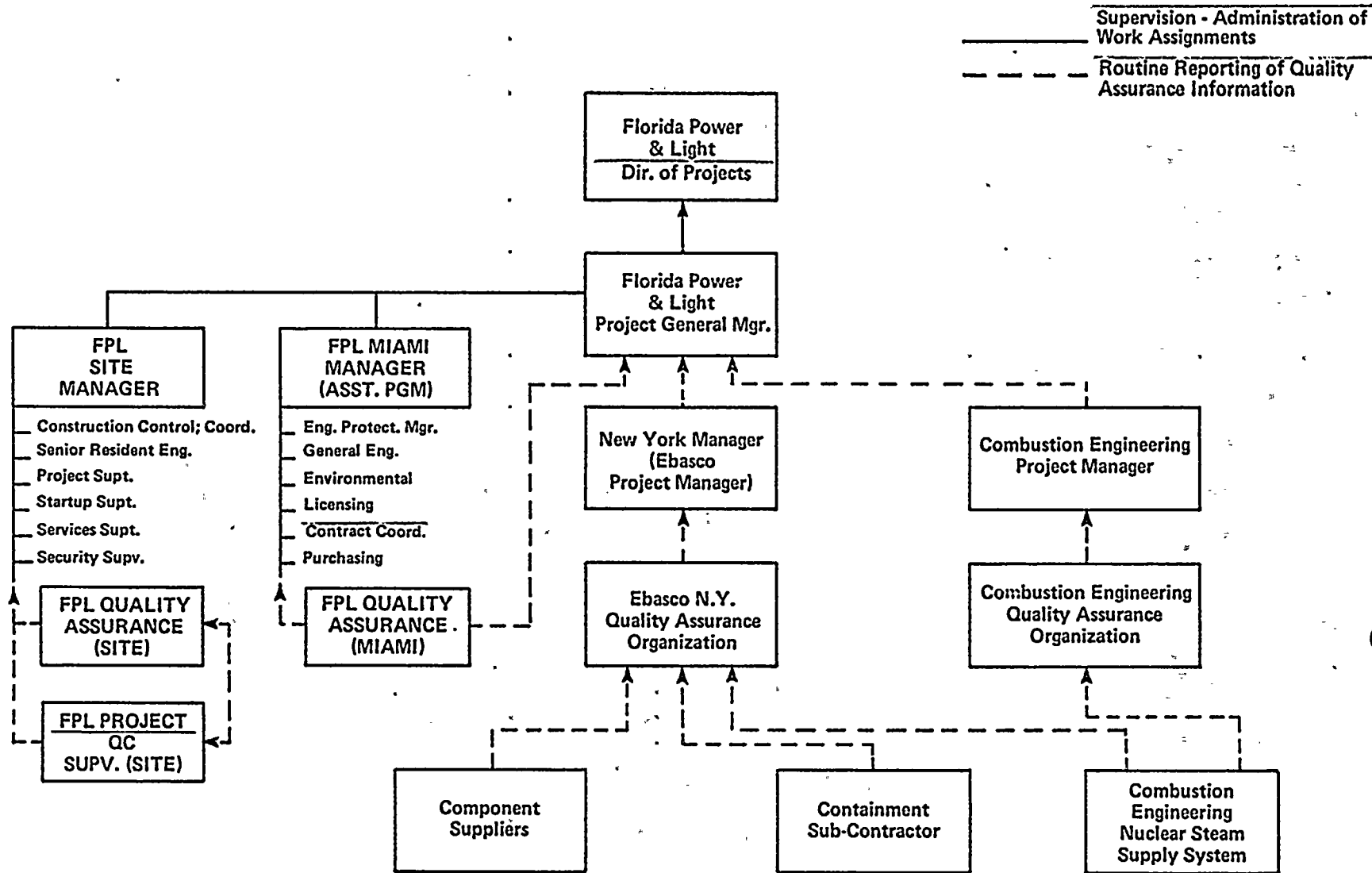




\_\_\_\_\_ Functional Reporting  
 - - - - - Project Direction

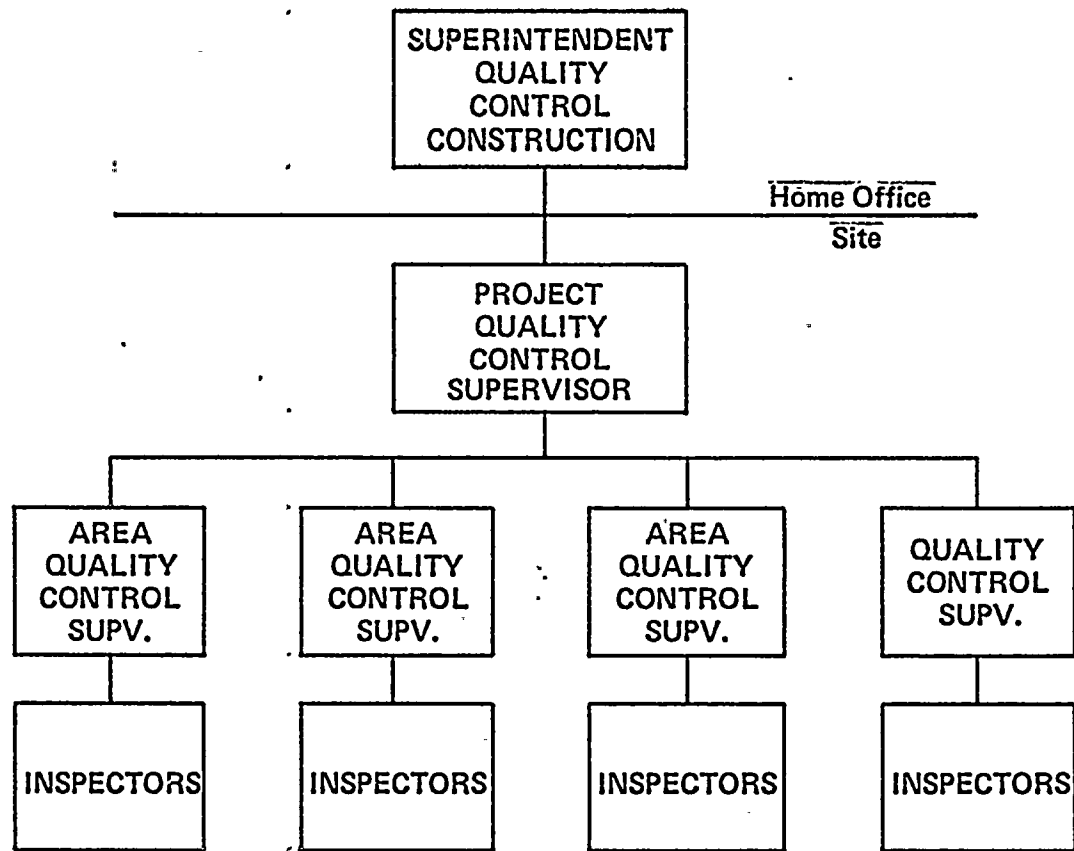
ST. LUCIE PLANT NO. 2  
 PROJECT ORGANIZATION CHART  
 FIGURE 1





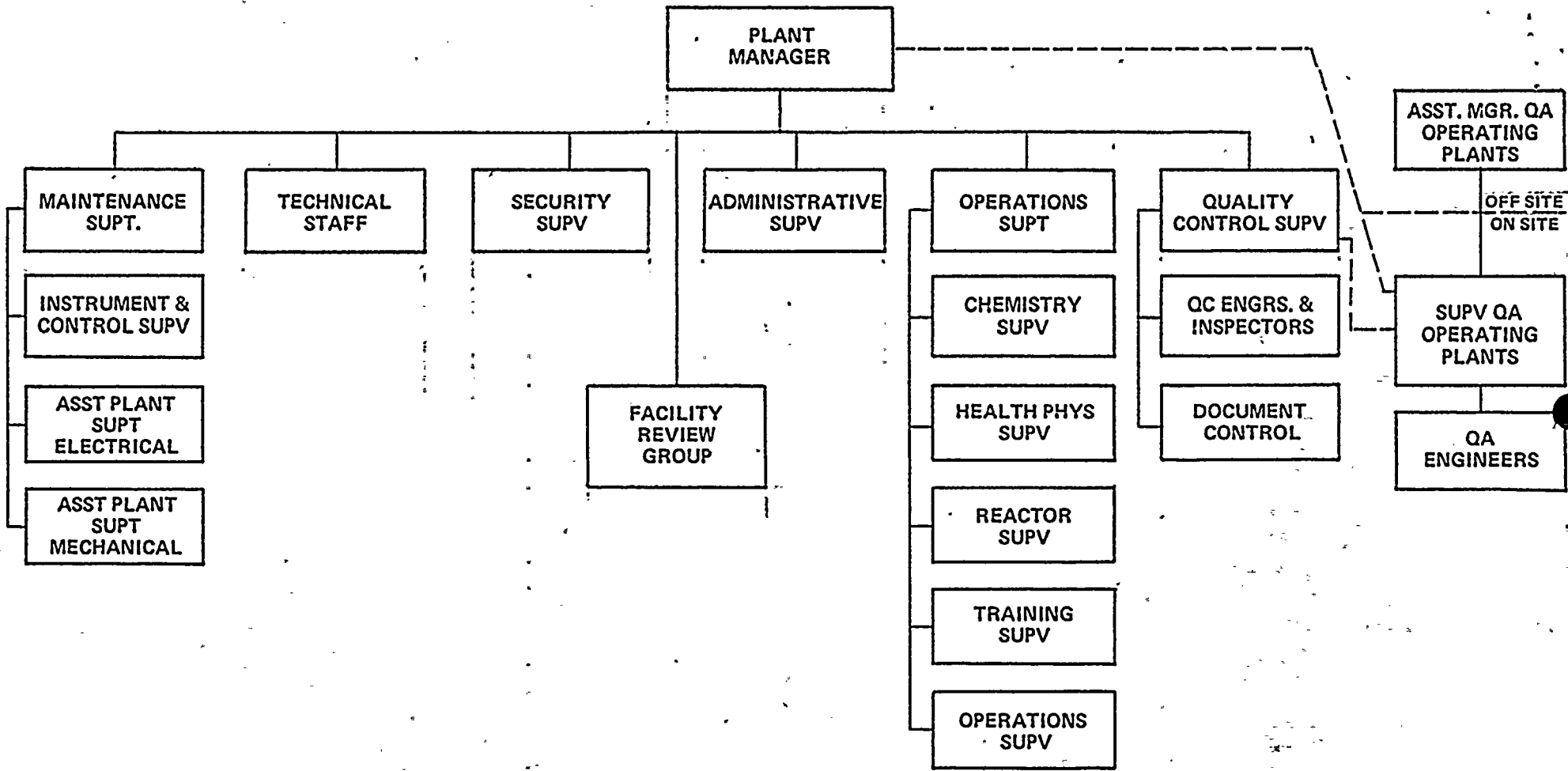
**CONSTRUCTION QUALITY ASSURANCE ORGANIZATION  
ST. LUCIE PLANT NO. 2**

**FIGURE 2**



ST. LUCIE PLANT NO. 2  
QUALITY CONTROL ORGANIZATION  
FIGURE 3





————— Administrative Reporting

- - - - - Communications

ST. LUCIE PLANT  
 PLANT QUALITY CONTROL ORGANIZATION  
 AND INTERFACE WITH QUALITY ASSURANCE

FIGURE 4



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