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John  
April 30, 1975  
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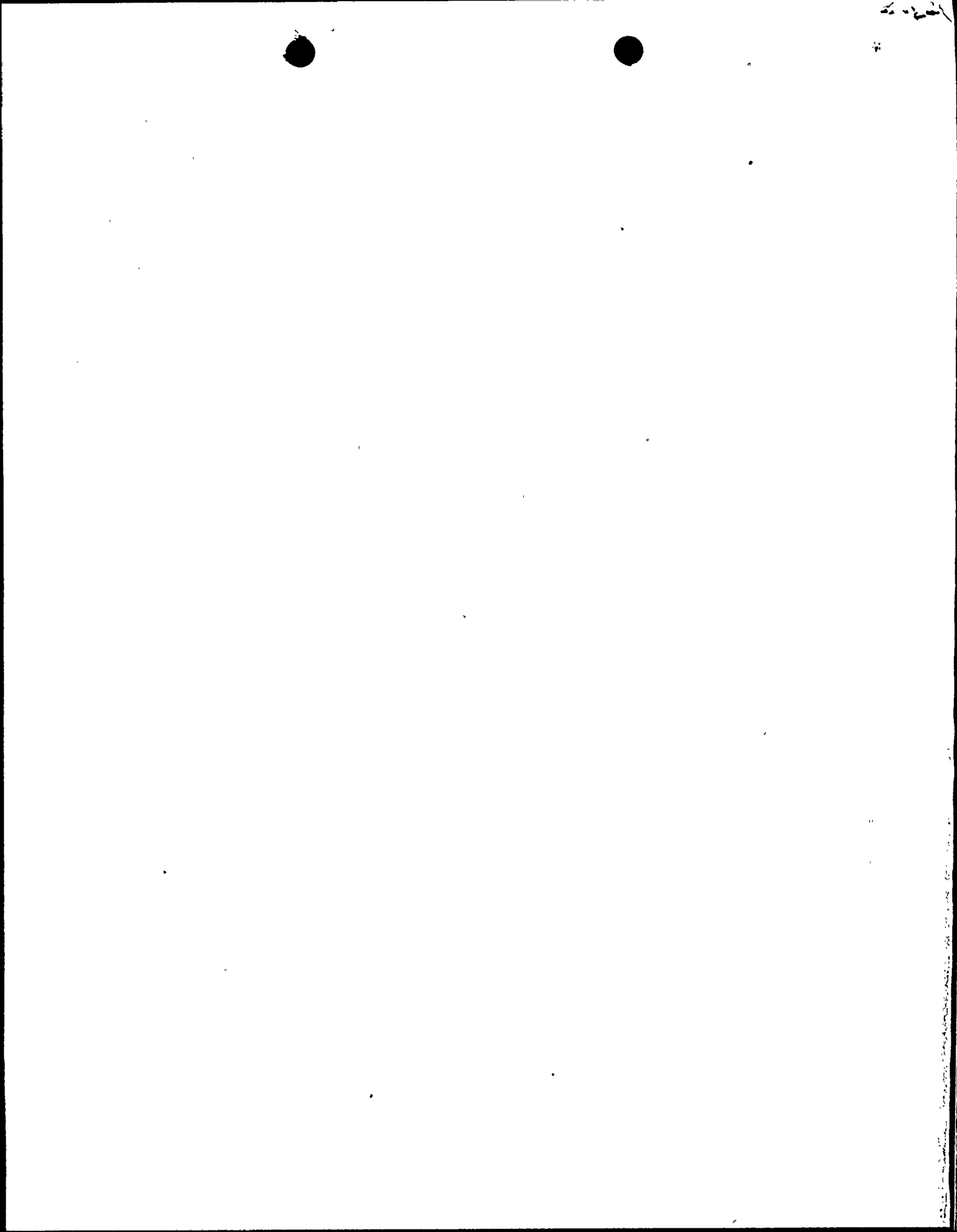
Mr. George Lear, Chief  
Operating Reactors Branch #3  
Division of Reactor Licensing  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Lear:

This letter is in response to your letter dated March 28, 1975, regarding the Operational QA Program at Turkey Point Nuclear General Station, Units 3 and 4 (PTP).

Although it is not practical to simply apply the St. Lucie Plant Unit 1 (PSL) QA Program to PTP because of the fundamental differences in staff requirements (PSL has only one unit; PTP has two nuclear and two fossil fueled units), facility requirements, code requirements, etc., we can and will apply the generic elements of the PSL Operational QA Program to PTP. Our plan for accomplishing this transition is as follows:

1. By June 28, 1975, we will submit to NRC a Topical Quality Assurance Report that is responsive to the guidance provided in WASH-1283, WASH-1284, and WASH-1309. This Topical Report will contain the generic elements of the Operational QA Program described in PSL Unit 1 FSAR and will apply to the design, procurement, construction and operation of all future nuclear generating stations, as well as PTP Units 3 and 4. Dr. Cockrell, FPL QA Manager, discussed our intention to prepare this Topical QA Report with Mr. Vollmer and members of this staff on March 12, 1975.
2. By January 1, 1976 (Day 0), we will complete a matrix, which will be available for NRC inspection at the plant site, identifying differences between the corporate Quality Procedures which represent the implementation of the QA Program described by the Topical QA Report and the PTP Administrative Procedures. The PTP Administrative Procedures implement the QA Program for operating, refueling, maintenance, and modification of nuclear safety related equipment specifically for Turkey Point Plant.



3. Day 0 +120 - During this period of time we will complete resolution of the differences identified in the matrix, promulgate revised corporate Quality Procedures and/or PTP Administrative procedures and complete training, staffing and implementing the revised procedures. Thus, assuming the NRC will have reviewed and approved the Topical QA Report by January 1, 1976 (Day 0), we will have implemented an Operational QA Program consistent with the guidance provided in the previously mentioned WASH documents for PTP Units 3 and 4 by April 29, 1976 (Day 120).

As a point of clarification when we submit the Topical Report on June 28, 1975, we will also submit a description that is in conformance with the Standard Format and Content for Safety Analysis Reports for Nuclear Power Plants, Section 17.2. However, this description will contain only a reference to the Topical QA Report plus any information unique to PTP that would be too specific for the Topical Report.

O.K.

You have requested, "If your program contains exceptions to the provisions included in these documents, you should identify such exceptions and describe your alternative approach." As a matter of practicality, our response to this request must be (a) we will describe the FPL approach in the Topical QA Report, (b) the approach will be responsive to guidance provided by WASH documents 1283, 1284 and 1309, and (c) we will be pleased to explain any apparent differences between our approach and the WASH documents that arise from the NRC review. Because of the lack of specificity and inconsistency among the standards contained in the WASH documents (many of which are in the draft phase) and because the standards writers (as well as NRC personnel) are not in full agreement on certain terms and definitions, it is not always clear to us when we have taken an exception. It is for this reason that our QA Department has informed the staff at PTP and PSL that the FPL QA Manual contains the FPL position relative to the requirements of the WASH documents. To date the FPL QA Program as described in the FPL QA Manual has been audited against the WASH-1283 (Design & Procurement QA) and WASH-1309 (Construction QA) documents by NRC-I/E Region 2 inspectors and no deficiencies exist. We are prepared for an audit against the WASH-1284 (Operations QA) document which we anticipate in the near future prior to receipt of the Operating License for PSL Unit 1. Therefore, it is with a reasonable level of confidence that we have taken this position in order to give our operating plants a stable QA

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Program while the government and industry continue to struggle with the larger problem of developing guides and standards at the national level. Of course, we will update our program when appropriate.

Sincerely,

*R. E. Uhrig*  
REU

Robert E. Uhrig  
Vice President

REU:tg

cc: Mr. R. Vollmer /  
Mr. N. Moseley  
Mr. R. G. Cockrell,  
Mr. H. J. Dager

