

NEC PDR



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

JAN 22 1980

Docket Nos.: 50-482, 50-483
50-485, 50-486

Mr. N. A. Petrick, Executive Director
SNUPPS
5 Choke Cherry Road
Rockville, MD 20850

Dear Mr. Petrick:

SUBJECT: SNUPPS QA PROGRAM FOR DESIGN AND CONSTRUCTION


The QA Branch has reviewed the SNUPPS standard plant QA program for design and construction enclosed with your letter to Mr. Denton of December 20, 1979. We have not yet reviewed the associated site addenda.

The forward of the QA program indicates updating through Revision 15 of the PSAR. We have contacted the LPM and our Docket Room and have been unable to locate Revision 15. Revision 14 appears to be the last revision received. Our review, therefore, compared the December 20, 1979 submittal to what had been found acceptable through Revision 14. A request for additional information based on our review is attached.

Also, we note the inclusion of a separate QA program in Part 17C.0 for "Non-Category I Seismic Components," in a format for comparison to the QA program for fire protection. While accepting the concept of a "graded approach" to QA, we request that you meet with us to discuss how this part of the SNUPPS QA program meets the pertinent QA requirements of Appendix B. We suggest that this meeting also be used to discuss your proposed response to the enclosed Request for Additional Information.

Please call Mr. Jack Spraul of my staff to arrange for the meeting or if you have any questions on the above. He can be reached at 492-7741.

Sincerely,


Walter P. Haass, Chief
Quality Assurance Branch
Division of Project Management

Enclosure:
Request for Additional
Information

cc: S. Seiken, SNUPPS

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SNUPPS

Request for Additional Information

1. The commitment to ANSI N45.2.5-1974 on page 17.1-15 must include a commitment to supplementary NRC guidance. Revise the commitment to recognize Regulatory Guide 1.94 of April 1976 or revert to the earlier (Revision 3) commitment to draft 3, revision 1 of N45.2.5 including Regulatory staff comments and supplementary guidance from Section D of the "Green Book."
2. The addition of the words "by the design organization" to the fourth sentence of the first full paragraph on page 17.1-22 and to item g on page 17.1-24 implies that changes and revisions that affect the quality requirements of procurement documents may not be reviewed by the quality assurance organization. Clarify whether or not this implication is true in practice and, if it is true, provide justification.
3. The last two paragraphs on page 17.1-32 each reflect the concept of selective review and approval of bidders lists. Identify who (by position title) selects which bidders lists are reviewed and the bases of the selection.
4. Reinstate or justify the deletion of, "Certification of conformance or quality verification records will be transmitted to the plant site prior to or within sixty (60) days of shipment for safety-related products," from the middle of page 17.1-33.
5. Delete or justify the addition of "inadvertent" to the last sentence on page 17.1-35 which states: "Identification and control measures shall be provided to prevent the inadvertent use of installation of incorrect or defective material, parts, or components."
6. Reinstate or justify the deletion of: "Such persons shall not report directly to the immediate supervisors who are responsible for the work being inspected" from item a on page 17.1-39.
7. Discuss the use of an "equivalent organization" to disposition nonconforming items as "use-as-is" or "repair" as allowed by the second paragraph on page 17.1-49.
8. Item f on page 17.1-50 introduces the concept of significant nonconformances. Identify who (by position title) determines which nonconformances are not significant and the bases of the determination. Also describe how nonconformances which are not significant are handled.
9. Replace or justify the deletion of the sixth paragraph, eighth paragraph, and most of the ninth paragraph from Section 17.1.15 on pages 17.1-50 and 17.1-51.

10. Replace or justify the deletion of "approvals of suppliers' QA programs and shop inspection reports" from the list of records delivered to the site at the middle of page 17.1-57.
11. Discuss the significance of deleting "independent" and "all" from the paragraph starting at about the middle of page 17.1-61. Also discuss the significance of adding "or assessments" to part a of the same paragraph.
12. Discuss the significance of deleting the first paragraph from part 17A.1.2.4, "Personnel" on page 17A.1-18.
13. A waiver of audits has been added to part 17A.1.7.4 in the middle of the last paragraph on page 17A.1-26. Provide a commitment that when such waivers are made, the involved supplier will be audited at least once every three years. A similar commitment is required in the paragraph starting on page 17A.1-31 and concluding on page 17A.1-32.
14. Page 17A.1-26a which contains most of part 17A.1.8 is missing.
15. Discuss the significance of changing the solid line on Figure 17A.1-8 between the Snupps Procurement Manager and the Project Inspection Supervisor to a broken line.
16. Replace or justify the deletion of receiving inspection from fire protection items 3 and 4 on sheet 3 of Table 17C.0-1.
17. State whether or not the SNUPPS' nonconformance control program and corrective action program for fire protection, described in the A/E's Project Engineering Procedures, meet sections 17A.1.15 and 17A.1.16 of the SNUPPS' QA program description. If not, list and justify the deviations.
18. Explain what is meant by: "The SNUPPS/Utility QA organizational audit provisions satisfy the requirements of Paragraph d of Section 10.0, except that audit frequency may vary depending on the time span of the activity being audited." This is found in item 10 on Sheet 2 of Table 17C.0-2.