



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

June 9, 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: Zion Station Units 1 and 2
Response to NRC Request for
Information for Quality
Assurance Program - Upgrade Review
NRC Docket Nos. 50-295 and 50-304

Reference (a): April 8, 1980 letter from A.
Schwencer to D. L. Peoples

(b): May 20, 1980 letter from S. A.
Varga to D. L. Peoples

Dear Mr. Denton:

Reference (a) requested Commonwealth Edison Company to provide information for the NRC Staff to perform a QA Program - Upgrade Review for Zion Station. Reference (b) requested additional information to supplement the material submitted in connection with Reference (a). Commonwealth Edison's response to this request is contained in the Attachment to this letter.

Please address any question that you might have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this transmittal are provided for your use.

Very truly yours,

D. L. Peoples
D. L. Peoples
Director of
Nuclear Licensing

attachment

8006160071

June 9, 1980

RESPONSES TO NRC's QUESTIONS (CONT.) 28-42 REGARDING
COMMONWEALTH EDISON COMPANY
QUALITY ASSURANCE PROGRAM FOR ZION UNITS 1 & 2

Question #28

Describe how QA personnel identify quality problems; how they initiate, recommend, or provide solutions to problems; and how they verify the solution of problems.

Response

QA personnel identify quality problems through:

- a. Review of deviation reports, discrepancy reports, receiving inspections and similar reports;
- b. Surveillance activities at the station;
- c. Audit activities at the station;
- d. Review and surveillance of modification packages and work packages;
- e. Review of NRC correspondence to the station and operating status reports;
- f. Items brought to the attention of Quality Assurance by employes of the station and contractors;
- g. Review of N.D.E. Reports.

Solutions to problems are initiated or recommended through:

1. Final Review of discrepancy reports;
2. Corrective Action review and audits which include but are not limited to deviation reports and regulatory commitments;
3. Correspondence initiated to the stations such as surveillance reports;
4. Audit reports;
5. Informal discussions with the station management.

Response (cont.)

Quality Assurance may suggest corrective measures, but does not formally participate in establishing the specific corrective action. Station Quality Assurance verifies acceptable and approved solutions to problems by review, inspection, surveillance and audit plus by required review and documented indication of concurrence on the applicable discrepancy and nonconformance reports. Also in cases where the corrective action may not appear to be acceptable, the proposed corrective action is referred to the Off-Site Review Group for a technical decision as to being acceptable or for direction as to what the corrective action must be. (In addition, refer to previous response to Questions 26 and 27 for further explanation.)

Question #29

Identify (by position title) the QA personnel who have documented stop-work authority at the Zion Plant and describe how this authority is exercised.

Response

As stated in the Quality Assurance Program Topical Report, the Manager of Quality Assurance has the stop work authority. Stop work can be recommended by any of the Quality Assurance Inspectors at an operating nuclear station to the Manager of Quality Assurance. Stop work is normally achieved through discussions with the Station Superintendent, the Division Manager for Nuclear Stations, or the Manager of Station Construction in an effort to have them initiate and direct the stop work action. If the discussions aren't successful in immediately correcting the problem or stopping the work or operating activity, the Manager of Quality Assurance would initiate action. Site personnel have authority to halt a work function for the time necessary to get a final decision from the Manager of Quality Assurance.

Question #30

The requirements for the Manager of Quality Assurance given in part 1.1 are not totally acceptable. It is our position that minimum qualifications for this position are those described in Section 4.4.5 of ANS 3.1-1979 or equivalent. Describe credentials considered equivalent if they are used.

Response

See the additional response to NRC-Q421.7 dated May 19, 1980, to W. P. Haass.

Question #31

Identify (by position title) the person responsible for directing and managing the Zion onsite QA program, and show that he has appropriate organizational position, responsibilities, authority, and freedom from non-QA duties so that he can exercise proper control of the QA program.

Response

External to the station, the Director of Quality Assurance (Operations) and the Quality Assurance Supervisor (Maintenance) direct and manage the Quality Assurance Organization activities at Zion. Their responsibilities are described in Section 1 of our Quality Assurance Program Topical Report. Within the Station Quality Assurance group, a Senior Quality Assurance Inspector directs and coordinates the activities of the other Quality Assurance Inspectors in order to assure areas are covered and inspection efforts are accomplished. The Senior Quality Assurance Inspector has no non-Quality Assurance duties to interfere with the proper exercise of the implementation and control of the Quality Assurance Program.

Question #32

Describe measures which require drawings and specifications (and changes thereto) be reviewed by the QA organization to determine that the documents are prepared, reviewed, and approved in accordance with Commonwealth Edison's procedures; that the documents contain the necessary quality assurance requirements such as inspection requirements and acceptance requirements; and that the results of this review are documented.

Response

Station Nuclear Engineering has the overall engineering responsibility including responsibility to evaluate, approve and control designs and design documentation for ASME Code, Safety Related and Balance of Plant structures, systems and components. Procedures establish these responsibilities plus require that design requirements, including regulatory, code and Standards requirements be reflected in specifications, drawings, procedures and instructions. In addition, provisions are included to assure that quality standards and quality requirements are specified in design and procurement documents.

Specifications and procurement documents and changes thereto are reviewed by Quality Assurance to ensure necessary quality requirements are included. Further, Quality Assurance perform surveillances and audits of the respective engineering organization to assure drawings have been reviewed, approved and distributed pursuant to approved design and document control procedures. (The response to Question 2 provides additional details relative to this question.)

Question #33

Describe provisions which assure that drawings and specifications receive a documented check to verify dimensional accuracy and completeness.

Response

As stated in Question 32, engineering has the overall responsibility for design, design review and approval and design control. The design is evaluated as to operability, reliability, maintainability, constructability, safety, adherence to applicable codes, standards, criteria and regulatory requirements and inclusion of quality requirements.

Design reviews and verifications of all design documents are required by involved engineering organizations. Engineering and Quality Assurance procedures detail the design review and design control requirements of our Quality Assurance Program Topical Report which requires that design documents including drawings and specifications receive a documented check to verify correctness and completeness and that the documents are approved or accepted and controlled. Quality Assurance conducts surveillances and audits to assure that drawings and specifications receive a documented check to verify correctness and completeness as well that the design and associated documents are controlled.

Question #34

Clarify that topical reports and SARs are controlled under the document control program described in Section 6 of CE-1-A.

Response

Distribution of topical reports and SAR's, and changes thereto, are made to established distribution lists by the Nuclear Licensing Administration group. The assignment and distribution of our Corporate Quality Assurance Manual (which includes the Corporate Quality Assurance Program (Topical Report), Quality Assurance Procedures, Station Quality Assurance Program, ASME Code Interface Document, Definitions and other related sections) and revisions made thereto, are approved and controlled by the Manager of Quality Assurance. Further, a page check audit of each assigned and controlled Quality Assurance Manual is conducted annually by Quality Assurance. Also, periodically revised, newly bound, copies of the current Quality Assurance Program Topical Report are redistributed. In the interim, revisions are issued to those on the distribution list.

Question #35

Describe how Commonwealth Edison evaluates the validity of suppliers' certificates of conformance.

Response

The validity of the suppliers' certificate of conformance is verified by Quality Control and Quality Assurance at the time of receipt inspection and during audits and inspections at the vendor facility.

Question #36

Describe measures which assure that Commonwealth Edison's QA organization establishes, files, and maintains qualification records of procedures, equipment, and personnel associated with special processes.

Response

The Company's Operational Analysis Department and Production Maintenance Department maintain qualification and certification records of Company procedures, personnel and equipment associated with special processes. Company welding procedures are approved by the Manager of Quality Assurance and Company NDE procedures are approved by the Company's designate NDE Level III and reviewed as to acceptability by the Manager of Quality Assurance. Contractor special process procedures are approved by Engineering. Finally, all special process procedures require On-Site Review approval.

Quality Assurance assures by surveillances and audits that the Company and Contractors establish, file and maintain qualification records of their respective procedures, equipment and personnel associated with special processes.

Question #37

Clarify that individuals performing inspections report to the QA organization.

Response

As further detailed in the various responses to Question #5, inspections of maintenance, modification and operation activities are independently performed by Station Quality Control and Station Quality Assurance. Station Quality Control reports to the Administration and Services Assistant Superintendent which is independent of the Maintenance and Operating groups of the Station. Station Quality Assurance reports off-site and is completely independent from the Station organization.

For work performed by contractors, inspections are performed by its Quality Control and Quality Assurance people, reviewed by Station Quality Control, and verified by Station Quality Assurance. Where inspections by Station Quality Control or Station Quality Assurance are deemed prudent, they establish inspection hold point on contractor travelers.

NDE of station or contractor work usually is performed by an Independent Testing Contractor under the direction of either Station Quality Control or Station Quality Assurance. Occasionally, the NDE is performed by the Company NDE group in the Operational Analysis Department.

Inspection results are reviewed as to acceptability by Station Quality Assurance.

Question #38

Describe measures which assure that Commonwealth Edison's QA organization verifies that inspection and test results are determined to be acceptable by a responsible individual or group and that the determination and verification are documented.

Response

Several methods and measures are used by the Commonwealth Edison Company Quality Assurance organization to assure inspections and tests are properly performed and results are found to be acceptable by a responsible individual or group. Through review and audit of personnel records, their qualifications to perform specific inspections are verified. By establishing inspection hold points and witness points involving selected maintenance, modification and operating activities, Quality Control and Quality Assurance verify through its inspections during the work activity that the respective inspections and tests are being properly completed and the inspection and test results are acceptable. Finally, at the completion of the work, the completed work package is reviewed by Quality Control and Quality Assurance to verify the inspections and tests as well as the work have been satisfactorily completed and the inspection and test results demonstrate this fact. This determination and verification is documented by Quality Control and Quality Assurance via surveillances and audits, travelers covering the work, NDE reports and various work package documentation sign-offs such as nonconformance or deviation reports, the Work Request and the Modification Approval document. The final Quality Assurance sign-off after satisfactory review of the completed work package documents this determination and verification.

Question #39

The first paragraph of Section 12.1 allows deviation from basic calibration tolerance ratios "with proper documentation and approval." Identify the management authorized to approve such deviations.

Response

Deviations from basic calibration tolerance ratios are documented and approved by the Operational Analysis Manager.

Question #40

Describe how Commonwealth Edison controls altering the sequence of tests, inspections, and other operations important to safety.

Response

The sequence of tests, inspections and other operations important to safety are conducted to approved procedures. Technical Specifications require approval of changes to procedures including temporary changes. Changes to procedures require the same level review as initial procedures. If the sequence of a test or inspection is not critical, provisions for altering the sequence are often stated in the procedure. In the absence of such a provision, a procedure change must be processed for approval as required by procedures and the Technical Specifications. Quality Assurance reviews and audits the administration of procedure changes including temporary changes.

Question #41

Provide a statement that nonconformance reports and investigative reports are analyzed by the QA organization to show quality trends and that the results are reported to upper management for review and assessment.

Response

Engineering has the responsibility to conduct reviews of NCR's to determine status, trends and the need to change design documents and procedures. The results of these reviews are documented. Copies are submitted to responsible upper management and the Manager of Quality Assurance for review and assessment and appropriate action.

In addition, quality trend problems identified by Quality Assurance reviews are reported to responsible upper management by the Manager of Quality Assurance.

Question #42

Describe the responsibilities of the QA organization for the definition and implementation of activities related to QA records for Zion.

Response

Documentation requirements are established in design documents such as specifications, procurement documents, procedures and the Quality Assurance Program and its implementing Quality Procedures. Documentation checklists are established as part of specifications and work packages to identify documentation which is required to be included in the final documentation package for retention by the station for the life of the plant. In addition, records requirements are specified in the Technical Specifications.

Station Quality Assurance is required to assure required and acceptable documentation is provided and that such records are controlled, properly stored and readily retrievable by the station.



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May 19, 1980

Mr. W. P. Haass, Chief
 Quality Assurance Branch - DPM
 U. S. Nuclear Regulatory Commission
 Washington, D. C. 20555

Dear Mr. Haass:

Subject: Commonwealth Edison Company
 Quality Assurance Program
 Topical Report CE-1-A Revisions
 NRC Dkts. 50-10, 50-237, 50-249,
 50-254, 50-265, 50-295, 50-304,
 50-373, 50-374, 50-454, 50-455,
50-456 and 50-457

Page 1-7 of Commonwealth Edison Company (CECo) Topical Report, CE-1-A, "Commonwealth Edison Company Quality Assurance Program for Nuclear Generating Stations" relative to NRC-Q421.7 is revised to replace the original page submittal of Rev. 11, dated 12/21/79, to include the education and experience requirements provided as the staff position in Mr. Walter P. Haass's letter of May 8, 1980, with the exception of the last sentence of that position whereby "six months of the one year experience shall be obtained within the quality assurance organization."

Such a commitment is impractical and unduly and unnecessarily restrictive and would automatically preclude the utilization of many qualified upper and Corporate level managers within Commonwealth Edison who have had many years of nuclear experience including responsibilities for the implementation of the Corporate Quality Assurance Program requirements within their own areas of responsibility such as for design, operation, construction and other nuclear support and services activities including pre-operational and startup testing activities. Such a six month commitment will result in the loss of the Manager of Quality Assurance at Commonwealth Edison to either promoting or hiring someone from outside the industry, the need to replace the person could happen suddenly without the necessary experience commitment it is

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 ANO 8005220571
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