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Docket Nos. 50-302
 and 50-312

MAY 12 1976

K. Goller, Assistant Director for Operating Reactors, OR

CRYSTAL RIVER UNIT NO. 3 AND RANCHO SECO - REQUEST FOR ADDITIONAL QUALITY ASSURANCE INFORMATION

The guidelines relating to QA for plant operations, which are contained in the WASH documents 1283-Rev. 1, 1284 and 1309, have recently been incorporate into ANSI N18.7-1976 (Revision of N18.7-1972), "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." ANSI N18.7-1976, which will be issued in the near future, will be endorsed by a revision to Regulatory Guide 1.33

In December 1974, the NRC requested both Florida Power Corporation (FPC) and Sacramento Municipal Utility District (SMUD) to augment the docketed QA programs for Crystal River Unit No. 3 and Rancho Seco, respectively, to include the guidance in the above WASH documents. Since both FPC's and SMUD's responses (letters dated January 28 and 31, 1975) do not satisfy the NRC requests, the enclosed letter has been prepared to assist you in reemphasizing the need for FPC and SMUD to comply with the above WASH documents or alternatively to comply with ANSI N18.7-1976 and the regulatory guides which endorse the ANSI standards referenced in N18.7-1976. This alternative approach will satisfy the NRC's guidelines for judging the acceptability of the operational QA program at Crystal River Unit No. 3 and Rancho Seco.

Please include the QAB on distribution of all correspondence related to this subject.

Original Signed by
 Don M. J. Skovholt

Donald J. Skovholt
 Assistant Director for Quality Assurance & Operations
 Division of Project Management

Enclosure:

- Letter of Request to Licensee

cc: w/enclosure
 R. Reid, OR
 W. Ross, OR
 V. Rooney, OR

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OFFICE	PM:QAB	PM:QAB	PM:QAB	PM:AD/DAO
SURNAME	JConway:bd/dg	JGilray	JHeltemes	DSkovholt
DATE	5/11/76	5/11/76	5/11/76	5/11/76

MAY 12 1976

Addressee

Gentlemen:

This letter is in reference to our generic review of quality assurance programs at all operating nuclear power stations and to our efforts to assure that the information in the docket contains a current description of the measures, which reflect how the requirements of Appendix B are being satisfied, used to carry out the QA program activities.

In A. Schwencer's December 4, 1974 letter to you, Florida Power Corporation (Sacramento Municipal Utility District) was requested to augment the docketed quality assurance (QA) program for Crystal River Unit No. 3 (Rancho Seco) to include the guidance in the WASH documents No. 1283, "Guidance on Quality Assurance Requirements During Design and Procurement Phase of Nuclear Power Plants - Revision 1," dated May 24, 1974, No. 1309, "Guidance on Quality Assurance Requirements During the Construction Phase of Nuclear Power Plants," dated May 10, 1974, and No. 1284, "Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants," dated October 26, 1973. Florida Power Corporation's (Sacramento Municipal Utility District's) response as contained in your January 28, 1975 (January 31, 1975) letter does not satisfactorily resolve our previous concern nor adequately address our request.

Since that time, ANSI standard N18.7-1976 (Revision of N18.7-1972)

"Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants" has become available. Our review of this most recent industry standard indicates that it does provide for the necessary

MAY 12 1976

controls to provide adequate confidence that, if properly implemented, the resulting QA program would be acceptable. Consequently, this ANSI standard will be endorsed by a revision to Regulatory Guide 1.33.

Accordingly, in lieu of complying with the guidance contained in the WASH documents as we previously requested, we would find acceptable a QA program consistent with ANSI N18.7-1976 and the Regulatory Guides (Nos. 1.8, 1.30, 1.37, 1.38, 1.39, 1.54, 1.64-Rev. 1, 1.74, 1.88, and 1.94) which endorse the ANSI standards referenced in N18.7-1976. For your information and use, a copy of ANSI N18.7-1976 (latest draft dated September 11, 1975) is attached. We are advised that the document is being printed and will be available in May 1976.

We believe you share our view that quality assurance is not a static issue. The criteria in Appendix B reflect broad requirements, and a number of different methods can be used to attain conformance with these criteria. A considerable body of guidance, as reflected in the documents mentioned above, has been developed defining acceptable ways to assure conformance with Appendix B criteria. We consider it essential that quality assurance programs at all operating nuclear power stations be in conformance with Appendix B requirements and that the docketed program description provides sufficient details on how these requirements are satisfied with equivalent controls to those described above. On this latter point, we believe you also share the view that the public should have access to a QA program description which reflects this level of detail.

MAY 12 1976

- 3 -

Although nonconformance with Appendix B criteria has not been identified in the Crystal River Unit No. 3 (Rancho Seco) QA program, we are not able to perform an evaluation regarding the adequacy of the QA activities in effect since many elements necessary to make this judgement are not addressed in the program description that was previously filed. Accordingly, we request that you file a revised QA program description for the Crystal River Unit No. 3 (Rancho Seco) which conforms to the above guidance. Please file this description within 90 days.

We shall be happy to meet and discuss this subject with you if you desire.

Sincerely,

Robert W. Reid, Chief
Operating Reactors Branch No. 4
Division of Operating Reactors

Enclosure:
ANSI N18.7-1976