

JUN 25 1976

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Docket No. 50-302

Florida Power Corporation
ATTN: Mr. J. T. Rodgers
Assistant Vice President and
Nuclear Project Manager
P. O. Box 14042
St. Petersburg, Florida 33733

bcc: J. Buchanan, NSIC
T. Abernathy, TIC

Gentlemen:

This letter is in reference to our generic review of operational quality assurance programs at all 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 Florida Power Corporation (FPC) you were requested to augment your docketed operational quality assurance (QA) program for Crystal River Unit, No. 3 (CR-3) 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. Your response as contained in your January 28, 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 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.

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Accordingly, in lieu of complying with the guidance contained in the WASH documents as we previously requested, we would find acceptable an operational 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, 1.58, 1.64-Rev. 1, 1.74, 1.88, and 1.94) which endorse the ANSI standards referenced in N18.7-1976 (latest draft dated September 11, 1975) is attached. We are advised that this document is now being printed and will be available in the near future.

We know you share our view that operational 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 operational quality assurance programs at all 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 an operational QA program description which reflects this level of detail.

Although nonconformance with Appendix B criteria has not been identified in the CR-3 operational 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 operational QA program description for CR-3 which conforms to the above guidance. Please file this description within 90 days, and notify us within 30 days of your intent regarding these matters.

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

Sincerely,

Original Signed By
J. F. Stolz

John F. Stolz, Chief
Light Water Reactors Branch No. 1
Division of Project Management

Enclosure:
ANSI N18.7-1976

cc: Mr. S. A. Brandimore
Vice President and General Counsel

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