



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

OCT 24 1980

Mr. J. E. McFarland, Head
Quality Assurance Division
Sargent & Lundy Engineers
55 East Monroe Street
Chicago, IL 60603

Dear Mr. McFarland:

SUBJECT: PROPOSED REVISION 6 TO SL-TR-1A

Your letter of September 29, 1980 proposed Revision 6 to SL-TR-1A, Sargent & Lundy's topical report, "Quality Assurance Program." We have reviewed the proposed revision and require additional information before we can complete our review.

Our request for additional information is enclosed. Your response should be submitted directly to me. Please contact Mr. Jack Spraul of my staff on (301) 492-7741 if you have any questions regarding our request. A meeting may be desirable after you have had a chance to review the enclosure.

Sincerely,

A handwritten signature in cursive script that reads "Walter P. Haass".

Walter P. Haass, Chief
Quality Assurance Branch
Division of Engineering

Enclosure:
Request for Additional
Information

8011100409

REQUEST FOR ADDITIONAL INFORMATION

Sargent & Lundy - SL-TR-1A

1. The list of regulatory guides committed to in the introduction should be revised to:
 - (a) include Regulatory Guide 1.26, 2/76, "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste containing Components of Nuclear Power Plants."
 - (b) delete Regulatory Guide 1.54 since commitment to this guide is not reviewed by the QA Branch.
 - (c) update Regulatory Guide 1.58 to Revision 1, September 1980
 - (d) include Regulatory Guide 1.144, September 1980, "Auditing of Quality Assurance Programs for Nuclear Power Plants."

(Reference change 3.)
2. The first full sentence at the top of page 01-3 states that Department Managers are responsible for the technical adequacy or acceptability of the design work within their disciplines. It appears the "or" should be "and." Clarify. (Reference change 7.)
3. Proposed revision 6 deletes the objectives of the Quality Assurance Coordinating Committee. We do not agree that these objectives are redundant with the responsibilities of the committee members. Reinstate the committee objectives. (Reference change 18.)
4. Proposed revision 6 has added construction management as an S&L activity under the controls of SL-TR-1A. The organization charts in part 01 of SL-TR-1A now show a Quality Assurance Division reporting to the Director of Services, a Quality Control Division reporting to the Technical Services Department Manager, and a separate Quality Control Group within the Construction Management Division. Discuss the relationship between these 3 QA/QC organizations. Describe the controls of the QA organization over the QC organizations and how these controls are administered.
5. A list of QA/QC related services which the Construction Management Division may provide begins on page 01-13. Identify which of these services are provided by the Site Manager's organization and which are provided by the Site QC organization. If any of these services are provided by the Site Manager's organization, discuss the independence of those providing the services from undue pressure of cost and schedule, and describe the QA/QC controls over these activities. (Reference change 24.)
6. Describe how S&L controls changes to computer programs. (Reference change 28.)
7. A list of Design Defining documents is provided on page 03-3. Provide a similar list of Design Implementing documents. Justify S&L's position that supervisory review of these documents is adequate in light of Regulatory Position 2 of Revision 2 of Regulatory Guide 1.64 and S&L's commitment to this Regulatory Guide on page 00-3 of SL-TR-1A. (Reference change 39.)

8. The responsibility for evaluating experience reports on problems originating at other plants has been reassigned "to the appropriate department." Provide more details on how this is accomplished. For example, what is the source of the reports? Who decides what department is appropriate? How is the information received and forwarded to the appropriate department? (Reference change 43.)
9. Part 03.05 no longer requires that the verifier be "independent of the preparer," and the explanation provided is that "qualification requires independence of the preparer." While this is an interesting concept, it is not one that is generally understood. Either indicate the independence of verifiers from doers in the topical report or make it obvious in the report itself that to be qualified, the verifier must be independent of the doer. (Reference change 44.) This same comment is applicable to proposed changes 52,
10. Part 04.02d and e used to require review by the assigned QA or QC Coordinator. The proposed revision requires review "by qualified personnel from the appropriate division." Clarify that such personnel are in one of the QA/QC organizations. (Reference change 53.)
11. Limiting the discussion of document changes on page 06-2 to design documents only is not appropriate. Commitments made in lines 11 through 24 on this page should not be limited to design activities and the added words should be deleted. (Reference change 58.)
12. The proposed revision to part 06.03 has eliminated several typical quality related types of documents from the responsibility of the Quality Assurance Division and from the Engineering Divisions. Indicate what organizations now have the responsibility. Also, we can visualize a licensee contracting its Construction Manager to be very involved with as-built or as-constructed documentation and we, therefore, disagree with eliminating "as-constructed drawings" from the list. (Reference changes 60 and 63.)
13. Clarify which documents listed in part 06.03 under the Construction Management Division are the responsibility of the Site Manager's organization and which are the responsibility of the Site QC organization. (Reference change 61.)
14. Page 07-2 (twice) and page 07-3 (once) indicate that quality assurance work will be performed by "appropriate" divisions. Clarify that the appropriate division is either the QA or QC organization. (Reference changes 69, 71, and 74.)
15. It appears that lines 73 through 78 of page 07-3 of Revision 5 of SL-TR-1A were inadvertently omitted from the proposed Revision 6. Clarify.
16. The paragraph deleted from lines 99 through 106 of page 07-4 of Revision 5 of SL-TR-1A does not appear to be redundant and should be replaced unless better justification is given for its deletion. (Reference change 73.)
17. The new section, 07.03, indicates receiving inspection is performed by qualified personnel. Clarify that these personnel are in one of the QA/QC organizations. Similarly, clarify the second paragraph of section 08.01 and the first paragraph of section 09.01 concerning audits and surveillance. (Reference changes 78, 82, and 84.)

18. Part 07.03 and the last paragraph on page 08-1 imply that receipt (or receiving) inspection only verifies identity and checks the paperwork. Page 12-37 of the third edition of Juran's Quality Control Handbook says the following regarding such inspections:

The extent of inspection of products received from vendors depends largely on the extent of prior planning for vendor quality control. In the extreme case of using surveillance and audit of decisions, there is virtually no incoming inspection except for identity. At the other extreme, many "conventional" products are bought under an arrangement which relies primarily on incoming inspection for control of vendor quality.

Item 7B1b on page 17.1-15 of Revision 1 of NUREG-75/087 (Standard Review Plan) requires that receiving inspection be performed to assure that material, components, and equipment satisfy the inspection instructions. The presumption, of course, is that receiving inspection has been planned and instructions resulting from the planning have been issued. Thus the referenced paragraphs on receiving inspection should be expanded to cover such activities.

19. Identify which activities and responsibilities described in Parts 10.00 through 16.00 are assigned to S&L's QA/QC organizations. (Reference changes 86-92.)
20. Clarify that external audits performed by the Construction Management Division are performed by the QC Group. (Reference change 102.)
21. Justify the deletion of (or reinstate) the sentence requiring the approval of the audit checklist by the Senior Auditor. (Reference change 103.)
22. Changing the time limit of reauditing scheduled completion of corrective action from "within 30 days" to "on a timely basis" makes the commitment unauditible. Provide an auditible commitment in this area. (Reference change 105.)