

SOUTH CAROLINA ELECTRIC & GAS COMPANY

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T.C. NICHOLS, JR.  
VICE PRESIDENT AND GROUP EXECUTIVE

(Nuclear Operations)

September 12, 1980

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

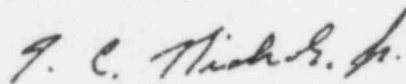
Subject: Virgil C. Summer Nuclear Station  
Docket No. 50/395  
FSAR Questions - Quality Assurance Branch

Dear Mr. Denton:

South Carolina Electric and Gas Company, acting for itself and agent for South Carolina Public Service Authority, provides twenty five (25) copies of material providing responses to questions from the Quality Assurance Branch. This material will be incorporated in the next FSAR amendment. The first three pages are provided to correct a numbering problem with questions issued by the branch. The last four pages are provided to give information inadvertently omitted from the last amendment.

If you require additional information, please let us know.

Very truly yours,



T. C. Nichols, Jr.

RBC:TCN:jw

cc: B. A. Bursey  
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Although you have addressed the ten specific quality assurance criteria in Branch Technical Position APCSB 9.5-1, we find that your response does not describe sufficient detail for these criteria. In order for the QAB to fully evaluate these criteria, additional detailed description is necessary. Examples of the detail we would expect South Carolina Electric and Gas Company to consider are provided in Attachment 6 of Mr. D. B. Vassallo's letter of August 29, 1977. If, however, you choose not to provide this detail, you may apply the same controls to each criterion that are commensurate with the controls described in your operational QA program (after acceptance by NRC). These controls would apply to the remaining construction activities and for the operations phase of Unit No. 1. If you select this method, a statement to this effect would be adequate for our review of the fire protection QA program.

RESPONSE

The same QA controls described in the Operational QA Program apply to the Operational Fire Protection Program with the exception of procurement, which will be commensurate with the original procurement controls.

From a recent discussion with our I&E personnel, we understand that your wording in the FSAR and your interpretation of the quality related regulatory guides described in Appendix 3A of the V. C. Summer FSAR may not necessarily mean a total commitment to these quality related regulatory guides. Wording such as "complies with the recommendations", "follows the guidance of" and "essential recommendations are met" may lead to misinterpretations of these quality related regulatory guides during the operations phase. Therefore, to preclude any misinterpretations in the future, it is requested that you review the quality related regulatory guides in Appendix 3A of the V. C. Summer FSAR and provide us with a clear commitment regarding your intentions to comply with them. Should you elect to comply with a guide, potentially ambiguous wording should be clarified. Should you elect to take any exceptions to these guides, provide us with sufficient description and equivalent supporting detail.

RESPONSE

The words "complies and recommendations" are used throughout Appendix 3A when SCE&G fully complies with the regulatory guide. These words are derived from the fact that the guide contains the recommended practices deemed acceptable by the NRC for the subject of the guides, and that other practices/exceptions would need definition provided. SCE&G believes this phrase leaves no room for misinterpretation.

A survey of the following Quality Related Regulatory Guides with the following results, relative to other phrases felt vague by the NRC which could lead to misinterpretation.

Reg. Guide 1.8 - no vague phrases

Reg. Guide 1.28 - no vague phrases

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- Reg. Guide 1.30 - word essential removed (See revised page APP 3A-36)
- Reg. Guide 1.33 - no vague phrases, typo corrected (see revised page APP 3A-43)
- Reg. Guide 1.37 - no vague phrases
- Reg. Guide 1.38 - word essential removed (see revised page APP 3A-48)
- Reg. Guide 1.39 - no vague phrases
- Reg. Guide 1.54 - no vague phrases
- Reg. Guide 1.58 - no vague phrases, typo corrected (see revised pages APP 3A-38 and 3A-89)
- Reg. Guide 1.64 - no vague words
- Reg. Guide 1.74 - no vague words
- Reg. Guide 1.94 - no vague words
- Reg. Guide 1.116 - no vague words
- Reg. Guide 1.123 - no vague words

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It is our understanding that your intent of complying with Regulatory Guide 1.33, revision 1, January 1977, does not necessarily commit you to comply with the guidance contained in ANSI N45.2.12 (Draft 4, Revision 2, January 1976), "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants." It is our position that your commitment to comply with Regulatory Guide 1.33 (which endorses ANSI 18.7-1976) also commits you to ANSI N45.2.12. Should your interpretation differ from our position, provide us with your rationale and explanation in equivalent detail.

RESPONSE

Pursuant to meetings held with the NRC Staff,  
refer to Appendix 3A for the SCETG position on  
Regulatory Guide 1.144 in which SCETG endorses  
ANSI N45.2-12

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2. All other standards are used throughout the test of 18.7 and specifically listed in Chapter 6, "References" within the body of 18.7. Standard N45.2.12 is referred to in the text by the words "further guidance on requirements for auditing of quality assurance programs for nuclear power plants exist in draft form."<sup>2</sup>

SCE&G believes this is a positive statement of fact and does not reflect any requirement that the referenced footnote<sup>2</sup> be used; only to call attention to its existence.

SCE&G's contention, therefore, is based on the fact that date wise, were are not committed to addressing compliance to Regulatory Guide 1.144 and hence to N45.2.12. This may be a moot point, however, in that the recent revisions to the SCE&G audit program (see questions 421.79 and 421.80) were utilizing 45.2.12 and Regulatory Guide 1.144. Thus, SCE&G believes our program complies with these documents but is not committed to them.

Paragraph 17.2.18.2 of the FSAR has been revised whereby external audits will be conducted on a triennial basis. It is our position that triennial audits will be acceptable if they are implemented in accordance with Section 4 of ANSI/ASME N45.2.12-1977. The triennial period should begin with performance of an audit when sufficient work is in progress to demonstrate that the organization is implementing a Quality Assurance Program having the required scope for purchases placed during the triennial period. When a subsequent contract or a contract modification that significantly enlarges the scope of activities performed by the same supplier is executed, an audit should be conducted to the increased requirements, thus starting a new triennial period. If, at any time of the pre-award survey, the supplier is already implementing the same quality assurance program for other customers which he proposes to use on the auditing party's contract, then the pre-award survey if it was conducted in accordance with Section 4 of ANSI/ASME N45.2.13-1977 may serve as the first triennial audit. Therefore, when such pre-award surveys are employed as the first triennial audits, those surveys should satisfy the same audit elements and criteria as used on other triennial audits.

A documented evaluation of the supplier should be performed annually. Where applicable, this evaluation should take into account (1) review of supplier-furnished documents such as Certificates of Conformance, Nonconformance Notices, and corrective actions, (2) results of previous source verifications, audits, and receiving inspection, (3) operating experience of identical or similar products furnished by the same supplier, and (4) results of audits from other sources, e.g., customer, ASME, or NRC audits. Modify your description to include the above position.



RESPONSE

The wording that was missing from page 17.2-50 which precluded the incomplete sentence on page 17.2-51 (as will be corrected in this amendment 19) states that "the frequency of audits is scheduled commensurate with the item of service to be provided." SCE&G contends that if a subsequent contract enlarged the scope of a contract, a subsequent audit would have to be performed if the previous area becomes no longer commensurate. Implementing procedures define how these evaluations are made as described programmatically in Section 17.2.4.4. (note 17.2.4.4 also contains Amendment 19 changes).

In the SCE&G program, pre-award surveys are not conducted differently than any external audit. The implementing QAP for pre-award surveys and external audits is one and the same. Section 17.2.18.2 indicates this fact by stating "These preaward surveys are conducted and reports prepared, to criteria described in 17.2.18.3"; which is the paragraph on audit requirement.

As stated in 17.2.18.2 on page 17.2-51, "vendors performing work over an extended period of time will be evaluated at least annually." This annual commitment and elements used in the evaluation is recently being defined in implementing QA Procedures in response to I&E concerns explained in 421.80. Our procedure contains elements 1 thru 4 of your question in this area verbatim. As with question 421.80, SCE&G believes the implementing procedure supplements the annual commitment given in 17.2.18.2 and need not be part of the program description. However, we again recognize the need for the NRC to be satisfied that the program descriptions are adequately implemented and are willing to supply implementing procedures to NRR in addition to I&E for evaluation.

As alternatives, SCE&G is prepared to meet and present implementing procedures to the NRR reviewer, or host the reviewer for first hand observation of the process.

Pursuant to meetings with the NRC Staff, refer to Appendix 3A for the SCE&G position on Regulatory Guide 1.144 which commits to the NRC position on annual evaluation and provides supplemental information

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