



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

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December 24, 1980

Dockets Nos. 50-321  
and 50-366

Mr. William Widner  
Vice President - Engineering  
Georgia Power Company  
P. O. Box 4545  
Atlanta, Georgia 30302

Dear Mr. Widner:

By your letter dated October 15, 1980 you submitted revisions to FSAR commitments related to the Quality Assurance Program at Hatch Units Nos. 1 and 2.

We have reviewed your submittal and determined that additional information, described in the enclosure, is required for us to conclude that the change does not decrease the effectiveness of the program.

We request that the additional information be provided within 45 days of your receipt of this request. The staff is willing to discuss this request either by phone or at a meeting if you so desire.

Sincerely,

*Peter B. Emberton for*  
Robert W. Reid, Chief  
Operating Reactors Branch #4  
Division of Licensing

Enclosure:  
Request for Additional  
Information

cc w/enclosure:  
See next page

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Hatch 1/2  
Georgia Power Company

50-321/366

cc w/enclosure(s):

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## EDWIN I. HATCH NUCLEAR PLANT UNITS 1 &amp; 2

Request for Additional Information

1. We find your exceptions to Regulatory Guide 1.38, March 16, 1973, "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants" (endorses ANSI N45.2.2-1972) are not justified.

- a. The exceptions to Section 5.2.1 of ANSI N45.2.2-1972 will be materials or equipment designated for use in a safety-related system will not be given a quality control receipt inspection upon delivery to determine shipping damage, but rather will only be issued from the warehouse following a quality control inspection is not acceptable.

This exception is contrary to the requirements of Criterion 7 of Appendix B to 10 CFR Part 50 which require examination of products upon delivery to assure purchased material, equipment, and services conform to procurement documents. Further guidance on this requirement is provided in Section 8 of ANSI N45.2-1971 (as committed to in Appendix A of the Hatch Nuclear Plant FSAR QA program description), and Regulatory Guide 1.38, March 16, 1973, to which you take exception. Additionally, the Hatch FSAR QA program description on page 17.2-14 specifically states safety-related items will be physically inspected for shipping damage, proper identification, and conformance to procurement document requirements. The exception described above appears to be contrary to this commitment.

Therefore, to assure the necessary QA/QC programmatic controls and requirements of Criterion 7 of Appendix B to 10 CFR Part 50 are fulfilled, it is an NRC staff position that shipping damage inspections be implemented and performed for all safety-related items upon delivery and that sufficient documentary evidence be available to demonstrate that these items are acceptable prior to use. Sole reliance on a quality control inspection prior to release from the warehouse is not acceptable.

- b. The exceptions to Sections 3.5.1 and 6.4.2 of ANSI N45.2.2-1972 in which the purpose of protective devices during transport or storage is reduced to an economic measure rather than to provide necessary protection for the quality of safety-related material and equipment are unacceptable.

Criterion 13 of Appendix B to 10 CFR Part 50 specifically requires measures be established to control the transport and storage of material and equipment in accordance with work and inspection instructions to prevent damage or deterioration. Your commitment to Regulatory Guide 1.28-1972 (endorsing Section 14 of ANSI N45.2) in the Hatch FSAR QA program description also requires protective measures to be implemented during transport and storage of safety-related items.

Consequently, to assure the requirements and quality objectives of Criterion 13 of Appendix B to 10 CFR Part 50 are met, it is an NRC staff position that measures be established, implemented, and documented during transport or storage for all safety-related items to control quality and to assure that these items can perform their intended functions.

2. Item (C) on page 17.2.7 of the Georgia Power Company October 15, 1980 submittal revises the commitment of ANSI N45.2.12, Draft 3, Rev. 4, 2/74 to ANSI N45.2.12-1977. We find this revision acceptable providing also you commit to the guidance contained in Regulatory Guide 1.144 (Revision 0-January 1979), "Auditing of Quality Programs for Nuclear Power Plants," which endorses ANSI N45.2.12-1977. Any exceptions and/or alternatives to this Regulatory Guide or ANSI Standard should be described in sufficient supporting detail to allow for NRC evaluation and determination of acceptability.
3. On page 17.2-7, exceptions are taken to paragraphs 1.2.3 and 3.2.3 of ANSI N45.2.13-1976 with the phraseology of, "by methods other than review" and "methods other than direct review." In order for the staff to evaluate and determine acceptability of the proposed exceptions, it is necessary that you describe and explain the alternative methods in sufficient detail. Therefore, provide a description of your proposed alternatives for those other methods by which acceptability of a supplier may be accomplished other than direct review of a supplier's documented quality program with sufficient supporting detail for our evaluation.
4. The exception to paragraphs 1.3 and 3.1 of ANSI N45.2.13-1976 requires additional clarification. Section 17.2.4, PROCUREMENT CONTROL, of the Hatch FSAR QA program description implies that the necessary QA/QC requirements of Appendix B to 10 CFR 50 will be identified on the purchase requisition. It was our understanding during evaluation of the Hatch FSAR QA program description, that the purchase requisition was the contractually binding documentation as defined in ANSI N45.2.10 for "Procurement Documents." The FSAR QA program description does not clearly indicate whether the requisition is the procurement document or whether the requisition is converted into a purchase order, thus becoming the procurement document as defined in paragraphs 1.3 and 3.1 of ANSI N45.2.13-1976. Therefore, it is necessary to clearly identify, in Section 17.2.4 of the Hatch FSAR QA program description, which document will be known as the procurement document that includes the necessary QA/QC requirements to satisfy Appendix B to 10 CFR Part 50. It is an NRC staff position that the review and concurrence of the adequacy of quality requirements stated in procurement documents is to be performed by personnel qualified in QA practices.