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

FEB 04 1981

Mr. Robert E. Uhrig
Vice President, Advanced
Systems & Technology
Florida Power & Light Company
P.O. Box 529100
Miami, FL 33152

Dear Mr. Uhrig:

SUBJECT: OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (FPLTQAR 1-76A)

We have evaluated Revision 3 to FP&L Topical Report FPLTQAR 1-76A, "Topical Quality Assurance Report," submitted with your December 17, 1980 letter to determine its conformance with Appendix B to 10 CFR Part 50. The basis for our review was the SRP (NUREG-75/087, Rev. 1) dated February 1979. In addition, we reviewed the alternatives/clarifications (ref. Appendix contained in Uhrig/Haass letter dated Septemebr 26, 1980) to Regulatory Guides and ANSI Standards.

A request for additional information relative to these documents is enclosed. Your response to the enclosure should be submitted as an amendment (25 copies of affected page changes) to the original report by April 1, 1981.

Should you have any questions or if you desire a meeting regarding our review, please feel free to contact Mr. James Conway on (301) 492-7741.

Sincerely,

Walter P. Haass

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

Enclosure:
Request for Additional
Information

C

FLORIDA POWER & LIGHT COMPANY
(FPLTQAR 1-76A, Revision 3)
Request for Additional Information

1. Update TQR 1.0, "Organization," to be consistent with the organizational change noted in the Uhrig/Haass letter dated October 3, 1980.

2. The applicable figures in Appendix A should be revised to reflect FP&L's recent organizational change.

3. Clarify the discrepancy between Figures 1-4 and 1-5 which show the QA/QC Coordinator reporting directly to the Manager of Environmental Tech Services and the Director of Licensing and Environmental Planning, respectively.

4. Clarify the discrepancy between Figure 1-9 which does not show the Manager of Inventory Systems and Control and Figure 1-1 which shows this individual reporting to the Director of Purchasing and Inventory Resources.

5. Describe the responsibilities of the Project QA Engineer (Figure 1-3) and the QA/QC coordinators (Figures 1-3, -4, -6, and -9).

6. Identify the position that is responsible for managing the onsite QA program.

7. The qualification requirements in Appendix B for the Director of Quality Assurance are not satisfactory. It is an NRC staff position that the qualifications and experience of the Director of Quality Assurance or Manager of Quality Assurance (Ref. Uhrig/Haass letter dated October 3, 1980) be at least equivalent to those described in Section 4.4.5 of ANSI/ANS 3.1-1978, "Selection and Training of Nuclear Power Plant Personnel." In lieu of the above, we would accept a commitment to the education and experience described in the following Section 4.4.5 of ANS 3.1-1979:

   EDUCATION: Bachelor Degree in Engineering or related science.

   EXPERIENCE: Four (4) years experience in the field of quality assurance, or equivalent number of years of nuclear plant experience in a supervisory position preferably at an operating nuclear plant or a combination of the two. At least one (1) year of this four years experience shall be nuclear power plant experience in the implementation of the quality assurance program. Six (6) months of the one year experience shall be obtained within a quality assurance organization.

   Provide a description to satisfy this position.

8. In Appendix C, a commitment is made to "follow the guidance" in WASH 1283, 1284, and 1309. The rainbow series of quality assurance guidance, of which these documents are a part, was generated in 1973 and 1974. They contain a large number of NRC regulations, regulatory guides, and industry standards, some in draft form. Although these documents reflected the best available body of guidance at that time, many of the components of the rainbow books have been superseded by later versions, and additional pertinent guidance has been developed through the ANSI consensus standards process. Consequently, quality assurance program descriptions

should reflect the degree of conformance to current regulatory and industry guidance; we will no longer accept descriptions that are keyed to conformance to the rainbow books.

Accordingly, FP&L's QA program description should be updated to reflect conformance with the regulatory positions provided by the NRC in the following regulatory guides for future operational activities including maintenance and modification: 1.8-Rev. 1-R (5/77); 1.26-Rev. 3 (2/76); 1.29-Rev. 3 (9/78); 1.30 (8/11/72); 1.33-Rev. 2 (2/78); 1.37 (3/16/73); 1.38-Rev. 2 (5/77); 1.39-Rev. 2 (9/77); 1.58-Rev. 1 (9/80); 1.64-Rev. 2 (6/76); 1.74 (2/74); 1.88-Rev. 2 (10/76); 1.94-Rev. 1 (4/76); 1.116-Rev. 0-R (5/77); 1.123-Rev. 1 (7/77); 1.144 (1/79); and 1.146 (8/80).

Appendix C should be modified to address this position. To preclude any misinterpretation regarding the commitment statement, it is recommended that the following or a similar statement be used: "The FP&L Quality Assurance Program complies with the Regulatory Position of the Regulatory Guides referenced in this appendix as modified by the exceptions stated on the following pages of this appendix."

9. Identify those personnel authorized to approve changes to the "Q-list" (i.e., safety-related items covered by the QA program) and describe methods for controlling its distribution.

10. Provide a commitment that the development, control, and use of computer code programs will be conducted in accordance with the QA program and include a description of how the QA program will be applied.

11. Describe the guidelines or criteria for determining the method of design verification (design review, alternate calculations, or test).

12. If the verification method is only by test, prototype, component, or feature testing should be performed as early as possible prior to installation of plant equipment, or prior to the point when the installation would become irreversible. Modify Section 3.2.4 to address this position.

13. Procedures should be established to assure that verified computer codes are certified and specified for a particular use. Modify TRQ 3.0 to address this position.

14. Describe the organizational responsibilities, including the involvement of the QA organization, for (1) procurement planning; (2) the preparation, review, approval and control of procurement documents; (3) supplier selection; (4) bid evaluations; and (5) review and concurrence of supplier QA programs prior to initiation of activities affected by the program.

15. Describe the provisions which assure that maintenance, modification, and inspection procedures are reviewed by qualified personnel knowledgeable in QA disciplines (normally the QA organization) to determine:

    a. The need for inspection, identification of inspection personnel, and documentation of inspection results.

    b. That the necessary inspection requirements, methods, and acceptance criteria have been identified.

16. Describe the provisions which assure that suppliers' certificates of conformance are periodically evaluated by audits, independent inspections, or tests to assure they are valid.

17. Describe the criteria for determining those processes that are controlled as special processes.

18. Describe the provisions which assure that when inspections associated with normal operations of the plant (such as routine maintenance, surveillance, and tests) are performed by individuals other than those who performed or directly supervised the work, but are within the same group, the following controls are met:

    a. The quality of the work can be demonstrated through a functional test when the activity involves breaching a pressure retaining item.

    b. The qualification criteria for inspection personnel are reviewed and found acceptable by the QA organization prior to initiating the inspection.

19. Describe the provisions which assure that inspection results are documented, evaluated, and their acceptability determined by a responsible individual or group.

20. Describe the organizational responsibilities for establishing, implementing, and assuring effectiveness of the calibration program.

21. Describe the provisions for the storage of chemicals, reagents (including control of shelf life), lubricants, and other consumable materials.

The following questions pertain to the Appendix attached with the Uhrig/Haass letter dated September 26, 1980.

22. Page 5, third paragraph - Describe the criteria FP&L uses to determine the degree of "care...appropriate for each item individually...."

23. Page 6, last sentence - After "established" add "with approved procedures."

24. Page 8 - This alternative is not required with a commitment to Regulatory Guide 1.58-Rev. 1 which endorses the 1978 version of ANSI N45.2.6.

25. Page 15, third paragraph - Describe the "degree of control" imposed upon commercial items.