

SNUPPS

Standardized Nuclear Unit
Power Plant System

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November 24, 1981

SLNRC 81-192 FILE: 0491.3.1
SUBJ: SNUPPS QA Program for
Design and Construction

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

Dockets: STN 50-482, STN 50-483

Dear Mr. Denton:

In response to your letter of September 1, 1981 to Union Electric Company and Kansas Gas and Electric Company, we are providing as an enclosure the additional information requested concerning the SNUPPS Design and Construction QA Program. Where appropriate, the additional information will be incorporated into Revision 4 to the subject program description. We anticipate issuing Revision 4 by December 31, 1981.

Very truly yours,

S. J. Leiken, Manager
Quality Assurance

SJS/dck-mtk11b12

Enclosure - Request for Additional Information

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Enclosure to SLNRC 81- 192

Request for Additional Information re

SNUPPS QA Program for Design and Construction

1. NRC Comment:

SNUPPS General - Figures 17A.1-1 and 17A.1-2 indicate that TPO has been eliminated and the Bechtel Power Corporation has been formed. However, Figure 17A.1-3 and Section 17A.1.1.1 still refer to TPO. Figure 17A.1-6 shows MF&QCS supporting TPO, and there is no indication on the figures where the MF&QCS Department reports. Also, Figure 17A.1-10 refers to TPO quality policies, and Section 17A.1.1.2 discusses TPO. Clarify.

SNUPPS Response

Bechtel acknowledges that several paragraphs and figures included in Section 17A.1, including those indicated above, contain references to the TPO (Thermal Power Organization) which has recently been eliminated. An update of the Bechtel section is currently in process to describe the current corporate structure and to properly reflect the relationships among Bechtel Power Corporation (BPC), Bechtel Power Management (BPM) and the departments performing quality functions. Text and organizational charts will be revised to reflect the current organization and will be incorporated in the next revision to the SNUPPS QA program description.

2. NRC Comment:

Callaway - The two new paragraphs at the top of page 17.1-5 assign quality assurance activities to "utility technical support personnel" and to the Manager, Nuclear Engineering. Discuss the involvement of Union Electric's Quality Assurance organization in these activities.

SNUPPS Response:

The two new paragraphs at the top of page 17.1-5 do not assign quality assurance activities to technical support personnel. These paragraphs are intended to indicate that utility technical support personnel (not formally assigned directly to the nuclear project) may be utilized in addition to the involvement by the nuclear function personnel in identifying quality related problems associated with the design and construction activities. They will not have direct responsibility for the particular phase of work being reviewed, but are acting under the direction of one of the nuclear project departments. Use of technical support personnel in the manner indicated is intended to supplement activities performed by departments within the nuclear function, including the Quality Assurance Department.

As indicated in the last paragraph on page 17.1-12, the Quality Assurance Department shares responsibility with Nuclear Engineering and Purchasing for review of bidders lists and approval of bids for purchase.

3. NRC Comment:

Callaway - The changes on page 17.1-9 change the responsibilities for preoperational testing from the Plant Superintendent to the Manager, Nuclear Construction, and the corresponding QA program from operating (Per FSAR) to design and construction (per Post-CP information). Discuss the involvement of the Plant Superintendent, his staff, and the Operations QA Group in the preoperational test program.

SNUPPS Response:

Operations personnel will participate in preoperational testing to the maximum extent consistent with completion of necessary training. Not all test manipulations will be performed by Operations personnel; for example, scheduled preoperational tests will not be deferred because the Operations Department cannot supply the required number of people. However, Operations personnel will be assigned to carry out all test manipulations for the major system integrated tests, in particular, the hot functional tests. Operating procedures will be evaluated through use during preoperational testing by UE Startup and Operations personnel. This effort will refine and where necessary, correct the permanent plant operating procedures prior to their use later in the plant startup evolution. Operations QA group personnel will participate in Construction QA group audits and surveillances of the startup organization's Phase I (preoperational) testing activities to the extent that the Operations QA group primary responsibilities relative to the operating quality assurance program will permit.

4. NRC Comment:

Callaway - The new paragraph on page 17.1-28 assigns responsibilities to the site QA group leader. It appears this should be the Superintendent, Site QA. Clarify.

Union Electric Response:

The reference to the site QA group leader is to the group leader of construction QA group. This position is currently held by the Supervising Engineer - Quality Assurance (Construction) who reports to the Superintendent, Site QA.

5. NRC Comment:

Wolf Creek - Item f on page 17B-6 indicates the Daniel Construction Manager is responsible to "Disposition nonconforming items." What are the QA controls applicable to this activity.

SNUPPS Response:

The Daniel Construction Manager dispositions nonconforming items in accordance with the QA Controls specified in the SNUPPS QA Program for Design and Construction and; in particular, those controls stated in Section 17B.1.15 of the Wolf Creek Site Addenda. Item (f) on Page 17B.6 will be revised to read: "Disposition nonconforming items in accordance with Section 17B.1.15."