THE VOGTLE PROJECT

UNIT 2

READINESS REVIEW PROGRAM

PROCEDURES MANUAL

MANUAL NUMBER: 34

ISSUED TO: M. V. Sinkule

ORGANIZATION: US, NRC - Region II

DATE: September 28, 1987

FOREWORD

The Vogtle Project Readiness Review Program Procedures Manual establishes procedures, methods, and instructions to be followed by all Readiness Review Program personnel in the performance of their duties. Also, interfaces with the Nuclear Regulatory Commission are described in this manual.

Controlled copies of this manual are distributed to Readiness Review Program team leaders and to those people designated by Readiness Review Program management. It is the responsibility of those people in supervisory positions to ensure that subordinates are trained in and are familiar with procedures contained herein.

Manual holders are expected to become familiar with the manual and to use it in their work. New or revised procedures are effective upon distribution and shall be implemented immediately.

R. W. McManus

Readiness Review Program Manager

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Date: 10 NOV 87

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1. PROGRAM DESCRIPTION

1.1 INTRODUCTION

The purpose of the Unit 2 Readiness Review Program is to provide a systematic and disciplined review of Georgia Power Company's (GPCs) implementation of design, construction, and initial test program processes to increase the assurance that quality program activities for Plant Vogtle have been accomplished in accordance with licensing commitments.

1.2 OBJECTIVE

The Unit 2 Readiness Review Program is a GPC self-initiated management system developed in follow-up of the Unit 1 Readiness Review Program and results to accomplish the following objectives:

- o Identify changes in the Unit 2 programs and work processes from those described and assessed in the Unit 1 Readiness Review modules.
- o Provide an in-depth self-assessment of the appropriate Unit 2 work processes and conduct separate management overview of the self-assessment process and its conclusions.
- o Further assure the early identification of any problems or concerns and ensure their correction in a timely manner.
- o Identify and follow-up on findings and corrective actions resulting from the Unit 1 Readiness Review process to preclude repetition of past problems during Unit 2.
- o Provide a mechanism for the early resolution of any differences between the Nuclear Regulatory Commission (NRC) and GPC interpretation of Unit 2 regulatory requirements and the acceptance criteria.
- o Provide a system that will facilitate the NRC's review, inspection, appropriate action, and approval of the acceptability of Plant Vogtle Unit 2 work processes on an advanced Readiness Review basis.

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o Provide a planning system, including GPC prepared and NRC accepted milestone schedules, for the orderly conduct of the separate actions of GPC and NRC.

1.3 SCOPE

The Plant Vogtle Unit 2 Readiness Review Program is an addition to the Unit 1 activities and translates the products of the Unit 1 program into useful management tools. Assessment of Vogtle Unit 2 activities, in general, address the following:

- o The listing of design and construction licensing commitments and implementing documents identified in the Unit 1 Readiness Review Program will be maintained and updated through the completion of Unit 2. Commitments unique to Unit 2, if any, will be identified and added to the listing. Nuclear Operations has responsibility for maintenance of Unit 1 operations licensing commitments apart from Readiness Review.
- O Unit 2 activities to be assessed include design, construction, and Initial Test Program Preoperational Test Phase.
- Assessments include programmatic and technical attributes for evaluation. During Unit 1 Readiness Review, assessment of design technical attributes was covered in-depth in the Independent Design Review. Due to the commonality of design bases, criteria, and specifications, and the advanced stage of design work at the time of the Unit 1 Readiness Review, a separate Unit 2 Independent Design Review will not be conducted. Rather, any applicable attributes or follow-up on Unit 1 findings are covered by the specific Unit 2 modules.
- o The results of Unit 1 Readiness Review module assessments, along with applicable NRC inspections, and other sources such as Inspection and Enforcement bulletins, Quality Assurance audits, etc., are evaluated to assist the direction of the Unit 2 program. The results of these evaluations are used to determine those Unit 1 module areas that require a Unit 2 assessment.

2. ORGANIZATION AND RESPONSIBILITIES

2.1 PURPOSE

This procedure describes the Unit 2 Readiness Review Program organization and responsibilities of the Readiness Review Program Task Force and others with specific activities within Readiness Review Program scope. Qualifications of the Readiness Review Task Force personnel are also included in this procedure.

2.2 ORGANIZATION

The Unit 2 Readiness Review Program organization is comprised of the Readiness Review Board, the Readiness Review Task Force, Project Engineering, Project Construction, Project Start-up, Nuclear Operations, and Quality Assurance (QA).

2.2.1 READINESS REVIEW BOARD

The Readiness Review Board consists of the following members:

- o Southern Company Services (SCS) Vice President Nuclear. (Chairman, Readiness Review Board).
- o GPC Vogtle Project Engineering Manager.
- o GPC Vice President Vogtle Construction.
- o SCS Executive Consultant Licensing.
- o GPC General Manager, Vogtle Project Support.
- o GPC General Manager, Corporate Quality Assurance.
- o Stone and Webster Engineering Corporation Vice President and Senior Engineering Manager.
- o Readiness Review Program Manager (Secretary and non-voting member).

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2.2.2 READINESS REVIEW TASK FORCE

The Readiness Review Task Force is comprised of the Readiness Review program manager, technical team members, and support personnel. The Readiness Review Task Force reports to the GPC general manager, Vogtle Project Support.

Additionally, a module consultant, to provide off-project expertise, may be utilized, as needed, at the discretion of the Readiness Review program manager or the Readiness Review Board.

2.3 RESPONSIBILITIES

2.3.1 READINESS REVIEW BOARD

- o Meet as directed by the Chairman, Readiness Review Board but no less frequently than quarterly.
- o Review the adequacy of Readiness Review Program implementation and the results of audits and assessments.
- o Identify Board members who will serve as module sponsors to monitor module development activities as described in procedure 6.
- o Provide final approval of module results and conclusions.

2.3.2 READINESS REVIEW TASK FORCE

The Readiness Review Task Force, through the program manager, is responsible for:

- o Management of overall scope, direction, and schedule of this assessment program.
- o Maintenance of design/construction/preoperational test phase licensing commitments until Unit 2 Fuel Load.
- o Identification and consolidation of findings and corrective actions as a result of Unit 1 Readiness Review.
- o Preparation of Unit 2 assessment plans.
- o Review of QA's implementation of the Unit 2 assessment plans and evaluation of the assessment results.

- o Consolidation of Readiness Review Program assessments into Unit 2 Readiness Review modules.
- o Providing program status for Senior Project Management and the Project Management Board.
- o Establishment of the necessary management, control, and training for program implementation.
- o Promulgation of Readiness Review Board review results to the appropriate organization.
- o Preparation of agenda and minutes of the Readiness Review Board meetings.
- o Interaction with the Nuclear Regulatory Commission.

2.3.3 QUALITY ASSURANCE

Project QA is responsible for:

- o Implementation of the assessment plans generated by the Unit 2 Readiness Review Task Force, using QA personnel supplemented by personnel with technical expertise in the area under evaluation.
- o Continuation of their system of audits as described in the Project QA program.

Additionally, corporate QA will audit conformance to these procedures by all program entities.

2.3.4 PROJECT ENGINEERING, PROJECT CONSTRUCTION, PROJECT START-UP, AND NUCLEAR OPERATIONS

These organizations shall:

- o Ensure that licensing commitments in their area of responsibility are properly implemented and included in implementing documents.
- o Provide evidence to the Readiness Review Task Force that new or revised commitments have been implemented.
- o Ensure that findings resulting from Unit 1 Readiness Review have resulted in Unit 2 program and work activity changes where appropriate and as committed.

- o Provide evidence to the Readiness Review Task Force that the Unit 1 Readiness Review findings have been evaluated for impact and, if appropriate, implemented in Unit 2.
- o Provide Readiness Review with details of changes in project organization or programs from that described in the Unit 1 modules.
- o Provide responses to findings resulting from Unit 2 assessments.

2.4 QUALIFICATIONS

The following qualifications are minimum requirements for the positions indicated. Team members not meeting all requirements as indicated may be acceptable provided the Readiness Review program manager provides written justification as to the acceptability of the individual. Resumes of all Readiness Review Task Force personnel shall be maintained in Readiness Review Program files.

2.4.1 READINESS REVIEW PROGRAM MANAGER

- o Bachelor of Science in engineering or engineering technology, or be a Professional Engineer.
- o Minimum ten years experience in design or construction.
- o Minimum five years nuclear design/construction management experience.

2.4.2 READINESS REVIEW TEAM MEMBER

- Minimum Associate of Science in engineering or engineering technology or Bachelor of Science in physical science.
- o Supervisory experience in the specific nuclear design, construction, or startup discipline.
- o Minimum five years nuclear design or construction experience.

3. READINESS REVIEW PROCESS

3.1 CONDUCT OF REVIEW

3.1.1 PURPOSE

This procedure outlines the elements of the Unit 2 Readiness Review Program.

3.1.2 GENERAL

The Unit 2 Readiness Review process consists of four activities that are discussed below:

o Commitment Identification and Implementation

During the Unit 1 Readiness Review Program the Task Force performed a syr matic review of licensing documents and identified the Project commitments for design, construction, and operations. The list of commitments with the corresponding list of documents that implement the commitments were segregated by module and rece ved NRC review and concurrence. The Unit 2 effort performs a review of the same documents for any Unit 2 specific commitments and also reviews FSAR amendments and any additional letters to the NRC and updates and maintains current for Unit 2 the listing of licensing commitments and their implementing documents. In this regard, design, construction, and preoperational test phase commitments are maintained by Readiness Review while operations commitments are maintained by Nuclear Operations.

To ensure completeness, Readiness Review supplies these lists of licensing commitments and implementing documents to the appropriate project organization who is responsible for providing feedback to Readiness Review as to the method and documentation of the mentation.

Readiness Review as a part of the assessment will sample commitments within each applicable module scope and ascertain by examination of Project implementation (i.e., calculations, drawings, and construction

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processes, etc., for conformance) whether such information on implementation is correct.

o Unit 1 Finding Follow-up

A list of findings and corrective actions as a result of the Unit 1 Readiness Review Program has been established for use by the Project to assist in avoiding a repeat of past problems. The list contains the findings identified by Readiness Review and the NRC, coded by module, applicable program activities, and cause of deficiency.

The Project will use this document to ensure that Unit 2 programs and processes preclude recurrence of the problem. The Project will provide feedback to Readiness Review as to Unit 2 actions taken. Readiness Review will include an assessment of this process as a part of the Unit 2 modules.

As a special case of follow-up, the readiness of the Unit 2 security system is incorporated into the Unit 2 Readiness Review with rarticular emphasis on the review of programmatic changes to ensure the correction of security problems identified in Unit 1.

o Unit 2 Assessments

In the Unit 1 Readiness Review Program modules, Readiness Review assessed the adequacy of design, construction, and readiness for operation of Unit 1. Unit 2 assessment activities evaluate Unit 2 design, construction, and preoperational test phase to ensure that compliance to licensing commitments has been maintained. Additionally, an assessment of the planning and implementation of Unit 2 plant security is performed.

In developing the Unit 2 assessment plans, the following features are considered:

- Implementation of corrective action of applicable Unit 1 Readiness Review findings into Unit 2 activities.
- NRC findings and comments from Unit 1 Readiness Review applicable to Unit 2.
- Results of Units 1 and 2 Quality Assurance audits and NRC inspections subsequent to Unit 1 Readiness Review.
- Industry issues.

The plan includes guidelines on the extent of evaluation to be conducted and assessment details. The completed and management-approved plan is implemented by Readiness Review in accordance with the details of the plan.

Assessment activities for Unit 2 are developed based on the Unit 1 Readiness Review and NRC findings, the status of completion of Unit 2 activities during Unit 1 Readiness Review, and whether there have been significant changes in organization or program details for Unit 2 from that evaluated in Unit 1.

o Unit 2 Modules and Appendices

After completion of Unit 2 assessment activities, Readiness Review will publish a Unit 2 module.

Typically, a module includes:

- An updated commitment and implementation matrix.
- A program description that includes identification of significant changes from the Unit 1 program.
- A list of audits and NRC inspections conducted subsequent to the Unit 1 modules.
- A list of the Unit 1 Readiness Review Program findings and actions taken in Unit 2.
- Results of Unit 2 assessment.

3.2 COMMITMENT IDENTIFICATION AND IMPLEMENTATION

3.2.1 PURPOSE

This procedure provides direction for the identification of licensing commitments, establishment and control of a commitment data base, assignment of commitments to modules/appendixes, and identification of implementing documents.

3.2.2 SCOPE

This procedure applies to preparation of commitment and implementation matrixes for Unit 2. As in the Unit 1 Readiness Review program, commitments relative to Westinghouse activities as the Nuclear Steam Supply System (NSSS) supplier are omitted. Operations commitments are maintained by Nuclear Operations in response to Nuclear Operations procedures.

3.2.3 RESPONSIBILITIES

Readiness Review Task Force

Readiness Review is responsible for the control and maintenance of design and construction commitments and the identification of those commitments to the responsible Project organization for determining implementation. Additionally, the task force is responsible for follow-up of commitment implementation (procedure 3.5) and inclusion of the commitment and implementation matrixes into the modules (procedure 5).

Project (Design, Construction, and Startup Organizations)

The Project is responsible for verification of commitment implementation of licensing commitments and supplying Readiness Review with the results of their review.

3.2.4 COMMITMENT DEFINITION

A commitment is an obligation, as described in the Vogtle Electric Generating Plant (VEGP) Final Safety Analysis Report (FSAR) or correspondence with the Nuclear Regulatory Commission (NRC), to comply with an industry standard, Regulatory Guide

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(RG), Branch Technical Position (BTP), or owner-plan of specific action. For the purpose of Readiness Review, source documents for licensing commitment identification will be the VEGP FSAR and correspondence to the NRC including, specifically, correspondence pertaining to Inspection and Enforcement (I&E) bulletins and generic letters. Correspondence pertaining to NRC Inspection Reports and/or findings or reportable deficiencies [10 CFR 50.55(e)] is tracked by other Project programs. A file copy of each commitment source, described above, is maintained and will be kept current by posting amendments to the FSAR and filing of correspondence between Georgia Power Company and the NRC. Within these source documents, design, construction, and preoperational test phase commitments for safety-related activities will be identified. Examples of commitments, to the extent described in the VEGP FSAR, are:

- o American Concrete Institute (ACI) 318-71.
- o BTP-CMEB 9.5-1.
- American Society of Mechanical Engineers (ASME) III, Division 1, NCA-2000.
- o American National Standards Institute (ANSI) N45.2-2.
- o United States Nuclear Regulatory Commission RG 1.55.
- Cited Technical Reports utilized as design basis or methodology.
- Specific design and/or construction considerations.
- o Specific standards of acceptance.
- o Specific cited technical data used as a design basis and/or unique design methodology.

Descriptions, detailed data and/or parameters resulting from design activities, general codes, and regulations are not generally considered licensing commitments for this program. These include:

- o Dimensions.
- o System operational concepts or operational descriptions.
- o References to general bodies such as 10 CFR 50, ASME, ACI (specific requirements from such bodies, however, are commitments).

- Design calculation details (e.g., strength parameters, flow rates).
- o Listings of information (tables, figures, etc.) which are presented for reader reference purposes or are summaries of specific commitments identified elsewhere.

3.2.5 COMMITMENT IDENTIFICATION

Commitments are identified through a detailed review of the FSAR and the other source documents. A controlled copy of the FSAR is maintained and updated for the use by the task force.

The logic diagram (Figure 3.2-1) shall be used as a guide in properly identifying licensing commitments. These guidelines were developed to support the definition of a commitment and to aid in maintaining consistency in the identification process.

An item from a source document qualifies as a commitment when it is a stated obligation to a standard, code, or specific licensing basis or is categorized into one of the indicated areas defining owner-plans of specific action. Once identified, each commitment will be assigned to the appropriate module(s). Items considered questionable as commitments, after following the logic diagrams or guidelines, shall be resolved by the Readiness Review program manager. The above process was performed in Unit 1 Readiness Review and a data base was compiled current to the FSAR amendment effective for each module.

3.2.6 PREPARATION OF COMMITMENT MATRIX

The Readiness Review Task Force utilizes the data base compiled for Unit 1 as a base from which a Unit 2 data base is developed. New commitments, or revisions to existing commitments, identified from FSAR amendments or other source documents are entered on a commitment edit sheet (Figure 3.2-2). The edit sheets are routed to the applicable team members for review. After review, the new/revised commitments are entered into the commitment data base. These additions and revisions are incorporated into the data base and a Unit 2 commitment matrix is published for use by the task force and the Project.

Readiness Review utilizes a personal computer to store commitments that have been identified. Commitments are stored in a data base. The structure of the data base is identified in Figure 3.2-3.

3.2.7 COMMITMENT IMPLEMENTATION

During the Unit 1 program, Readiness Review identified project documents implementing each licensing commitment. Commitments and implementing documents were tabulated in an implementation matrix and published in the Unit 1 module reports. Each module implementation matrix was current as to the module date and FSAR amendment identified in the report.

After publication of the Unit 1 modules, Readiness Review re-baselined the module implementation matrixes to a common date and FSAR amendment. The commitments for each module, current to the common date, were compared to the commitments published in the Unit 1 module report. Implementing documents were identified for each changed or new commitment and were entered into the implementation matrix data base.

Readiness Review then maintained the commitment and implementation matrixes, updating both for changed or new commitments upon issue of an FSAR amendment.

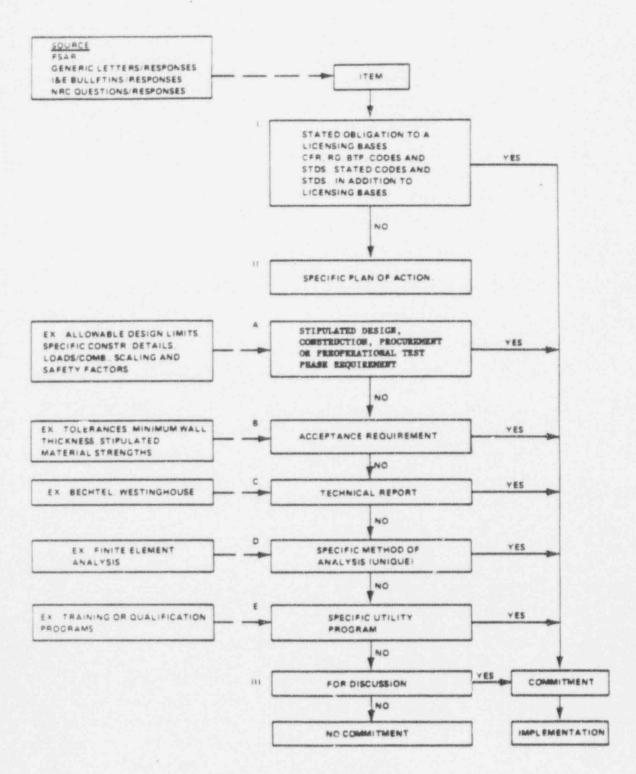
For the Unit 2 Readiness Review Program, Readiness Review continues to update commitments, but the Project has assumed responsibility for updating implementation data. The implementation matrix, tabulating current commitment data and the implementation data as maintained to the conclusion of the Unit 1 Readiness Review Program, is forwarded to the Project. Upon receipt, the Project will verify that the information contained for commitment implementation is correct by comparison of that information to current controlling documents. Where implementing documents have been revised, the Project will verify that the current revision continues to implement the commitment or take action to implement the commitment and identify corrective actions for work or processes that may be in noncompliance to the commitments. For newly identified commitments, the Project will identify controlling documents that implement the commitments.

Updated commitment implementation information will be returned to Readiness Review by the Readiness Review established response date. The preferred method of response is identification of changes in red on a copy of the list. Upon receipt of the updated implementation information, the data base will be updated.

3.2.8 REVISED OR ADDED COMMITMENTS

Subsequent to receipt of the updated commitment implementation information from the Project, any commitments that change (due

to later amendments, letters, etc.) will be re-submitted to the Project for additional implementation updating.



3.2-1 (Sheet 1 of 2) Commitment Identification

GUIDELINES FOR COMMITMENT IMPLEMENTATION

- o Source materials received and reviewed.
- o Is a statement made to comply or conform to a specific standard, regulatory guide, branch technical position, etc. (must be specific, not a motherhood or general statement: i.e., 10 CFR 50, ACI, or ASME)?
- o If it is not a stated obligation to licensing basis, is the statement a stipulated design or construction requirement, acceptance requirement, a specific and/or unique method of analysis, a specific utility training or qualification program, or a reference to a technical report used as design basis? (See examples on logic chart).
- o If the response to any of the above is yes, the statement is a commitment. If still uncertain, discuss with respective team leaders.

Items not generally considered commitments:

- o General codes/standards.
- o Dimensions.
- o System descriptions.
- o System operation descriptions.
- o Design calculation parameters.
- o Flow rates, etc.

Key works used in identifying commitments include:

- o will. (a)
- o shall. (a)
- o Conform to.

3.2-1 (Sheet 2 of 2)
Commitment Identification

a. Not applicable to dimensions, descriptions, or system operational (functional) descriptions.

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3.2-2 Commitment Edit Sheet

FIELD	FIELD NAME	TYPE	WIDTH
1	EDITNO	Numeric	8
2	NUMBER	Numeric	. 8
3	SOURCE	Character	20
4	SECTION	Character	25
5	SUBJECT	Character	200
6	COMMITMENT	Character	200
7	MODULE	Character	34
8	DES	Character	1
9	CONST	Character	1
10	REMARKS	Character	200
11	AMENDMENT	Numeric	2
12	REBASECHG	Character	1
13	CHANGEDATE	Date	8
14	IMPLEMENTN	Character	254

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3.3 UNIT 1 FINDING FOLLOW-UP

3.3.1 PURPOSE AND SCOPE

This procedure provides direction for developing the list of Unit 1 findings identified during the Unit 1 Readiness Review by either Readiness Review or the Nuclear Regulatory Commission (NRC). The list is used by the Project to ensure findings applicable to Unit 2 are factored into programs and practices to preclude recurrence.

3.3.2 SCOPE

This procedure applies to the process of establishing a list of findings from Unit 1 Readiness Review and the Unit 2 assessment of the applicability of those findings and implementation of corrective actions.

3.3.3 RESPONSIBILITIES

Readiness Review Task Force (Readiness Review)

Prepare a list of Unit 1 Readiness Review findings and NRC deficiencies from Unit 1 Readiness Review.

Project

Determine the applicability of Unit 1 findings to Unit 2 and, where applicable, verify that the Unit 2 programs and practices incorporate the corrective action identified for the Unit 1 findings. Provide justification to support a determination that a finding is not applicable to Unit 2 and provide feedback to Readiness Review as to Unit 2 actions taken.

3.3.4 IDENTIFICATION AND LISTING OF FINDINGS

The Readiness Review Task Force identifies the valid findings (both the NRC and Readiness Review) from the Unit 1 design, construction, initial test program modules, appendices, and Independent Design Review (IDR). Once identified, each finding is entered into a computerized data base (named Trends) to

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include the applicable module, finding level, finding description, and corrective action.

Once all the findings are entered into the data base, a matrix sorted by module and finding number is printed and provided to the Project.

3.3.5 PROJECT ACTION

The list of findings provided by Readiness Review is an abbreviation of the total stated finding and corrective action. To fully understand the finding and corrective action, the response as published in the Unit 1 module should be reviewed.

Each finding will be evaluated and categorized for applicability to Unit 2 as follows:

1. Isolated instance/one time corrective action

For Unit 1 findings where the Unit 1 investigative action determined the finding isolated with correction of the specific deficiency and without other corrective action (procedure revision, etc). No additional action required.

2. Corrective action remains identical and acceptable

For Unit 1 findings that required revision to procedures or practices with Unit 1 corrective action remaining in effect as published in the Unit 1 module.

Findings in this category shall include a description of investigative actions taken to verify correctness of this statement and should be supported by identification of the Unit 2 sample selection or procedure excerpts. Additionally, the investigative action must verify that the Unit 1 corrective action has been in effect during or applicable to all Unit 2 work.

3. Corrective action has changed

This category includes cases where the corrective action may have been eliminated or enhanced as a result of program evolution.

Finding corrective actions in this category require description of the deletion or changes with justification.

4. Corrective action not entirely effective

Unit 2 follow-up of the findings may identify that corrective action was not adequate. If this occurs, the response must identify the problem and describe what actions are being taken to determine the extent, tract and correct the deficiencies, and additional corrective action to prevent recurrence.

Response to each finding shall be returned to Readiness Review by the date specified by Readiness Review in the letter transmitting the findings matrix to the Project.

3.3.6 READINESS REVIEW ACTION

After receiving the Project response for each finding, Readiness Review will evaluate each response and determine whether the information supplied is adequate to support the categorization of each finding. Additionally, findings classified as "corrective action has changed" or "corrective action not entirely effective" will be evaluated for acceptability of the revised corrective action.

Upon acceptance of the Project response, the Readiness Review team member shall enter the Unit 2 finding category (as described in Section 3.3.5 above) in the matrix under the heading "Description of Unit 2 Follow-up Action". Findings for Category 3, corrective action has changed and 4, corrective action not entirely effective shall also contain a brief description of the condition in an attachment to the table. The remarks column shall be used to identify the location of this information.

Unit 1 finding follow-up is used as a source of information in the Unit 2 assessment as described in procedure 3.5.

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3.4 MODULE SCOPES

3.4.1 PURPOSE

The purpose of this procedure is to present the scope of each module and appendix, the relationships between them, and how each is addressed in the Unit 2 Readiness Review Program.

3.4.2 SCOPE

This procedure applies to those modules and appendixes that discuss construction, design, or preoperational test phase activities.

3.4.3 RESPONSIBILITIES

The Readiness Review Board approves the module scopes.

The Readiness Review program manager provides overall administration of the Readiness Review team activities.

The Readiness Review teams perform the initial module scoping and ensure that subsequent module activities adhere to the defined scope.

3.4.4 PROGRAM SCOPE

As discussed in procedure sections 1. and 3.1, the Unit 2 Readiness Review Program extends the Unit 1 pilot program into Unit 2. The Unit 2 program uses the Unit 1 pilot program results as a base and concentrates on identifying and examining changes to the programs and organizations assessed in Unit 1 and examining design, installation, and preoperational test phase activities performed since the Unit 1 pilot program for that module concluded. Programs that have been added are also included in the Unit 2 program, as well as some programs that were not examined by Readiness Review in Unit 1, but which experienced some difficulty during unit completion or preoperational testing (plant security, as an example). The module and appendix scopes presented in Section 3.4.5 of this procedure include the total scope of the Unit 2 design, construction, and preoperational test phase testing programs.

Revisjon: 0 Issue Date: September 28, 1987

Readiness Review Program Manager

The scope of the Unit 2 Readiness Review Program is summarized on Table 3.4-1. The Unit 2 design and procurement activities, civil/structural and backfill activities, tendon installation, and diesel generator activities were essentially complete at the time of the Unit 1 review and were conducted under the programs examined in Unit 1. Re-assessment of these activities is not necessary and the Unit 2 Readiness Review Program related to these activities is limited in nature. Activities performed by Nuclear Operations subsequent to Unit 2 fuel load will be conducted under the controls of the plant procedures now utilized for operation of Unit 1 and are not included in the Unit 2 Readiness Review Program.

3.4.5 SCOPE STATEMENTS

Appendix 1 of this procedure provides a description of the scope of each module and the relationships between other modules. Readiness Review procedure section 3.1 describes the four major activities that comprise the Unit 2 program, commitment identification and implementation, Unit 1 finding follow-up, Unit 2 assessments, and Unit 2 modules and appendixes. The scope description sheets in Appendix 1 list the extent to which each of these four activities will be performed for each module and appendix.

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PAGE 3

UNIT 2 READINESS REVIEW ACTIVITY SUMMARY

MODULE	DATE	1 ASSEST	SMENT :	SIGNIFICANT: FINDINGS	PROGRAM :	COMMITMENT :	T 2 READINESS U 1 FINDING :	REVIEW ACTIVITY	UNIT 2 MODUL
Appendices						CARTERIOR STATES	************	************	
Appendix C Procurement	05-85	75+	45*	yes	no	yes	yes	0.0	no
Appendix B Bocument Contro	05 85	75*	45*	yes	no	yes	yee	no	no
Appendix E Material Control	05 85	75*	45#	80	80	yes	yes	no	no
Appendix F Inspector Qualit	11 95 fication	90*	54#	yes	RO	yez	yes	1,111	yes
Appendix G Measuring and To	05-85 est Zquipment	75*	45*	yes	Bo	yes	yes	no	no.
Appendix 1 Quality Assuranc	04 85 ce Organizati	75a	450	30	no	yes	yes	no	во
appendix J Equipment Qualif	10-85	90*	54*	no	80	yes	yes	no	80

shaeed on plant complete at time of assessment

NOTE 1 : PART I - Implementation varification and corrective action followup

PART II - In process activities

PART 111 - Completion, turnover, and preoperational testing activities

MOTE 2 : Attachment 1 to this table explains the retionale of module selection

EVALUATION OF UNIT 1 ASSESSMENT RESULTS

Civil

An evaluation of the Unit 1 Civil modules listed below has shown that these modules developed for Unit 1 provided an adequate description and evaluation of the programs used for the Unit 2 work. This conclusion is based in part on the advanced state of design and construction completion of Unit 2 during the Unit 1 assessment.

Module 1 Reinforced Concrete Structures

Module 8 Structural Steel

Module 13A Foundation Materials and Backfill

Module 13C Post Tensioned Containment

For each of the above modules, the Unit 1 Readiness Review findings (RRFs) will be evaluated by the Project for applicability in Unit 2 and, if appropriate, corrective action steps verified implemented in Unit 2 programs and practices.

Mechanical

An evaluation of the Unit 1 Mechanical Module 16, Nuclear Steam Supply System, has shown that the module developed for Unit 1 provided an adequate description and evaluation of the programs used for the Unit 2 work. Specific findings as a result of Unit 1 Module 16 will be evaluated by the Project for applicability in Unit 2 and, as appropriate, implemented in the Unit 2 programs and processes.

Module 13B, Fire Protection, was an evaluation of the planning and implementation activities of the fire protection task force. The Unit 1 module concluded that the program was adequately planned and implemented in Unit 1. A similar programmatic approach will be used in Unit 2, thereby making a separate Unit 2 assessment by Readiness Review unnecessary.

Module 18C, Diesel Generator, verified that licensing commitments were met and modifications to the Transamerica DeLaval diesels were completed. The Unit 2 diesels are being modified in a similar manner as Unit 1 by the same organization which performed the work in Unit 1. Since the Unit 1 Readiness Review concluded the commitments were being met and the same process is being used in Unit 2, a separate Unit 2 assessment is not necessary.

Electrical

Unit 2 modules will be developed in the same module areas as Unit 1. For ease of presentation, modules 17 and 19 will be combined into a single module.

Operations

The Unit 1 Operations modules listed below consisted of an evaluation of the programs established for operation of the plant. These programs are being used in the operation of Unit 1 and will be adopted for operation of Unit 2 at fuel load. Since both units are operated using essentially the same organization and procedures and since the on-going evaluation and modification of operational programs is carried out under a rigorous program of operations, controls, and oversight, a separate Readiness Review is not necessary in the following areas:

Module	2	Operations Training and Qualification
Module	3	Operations Organization and Administration
Module	7	Plant Operations and Support
Module	9A	Radiological Protection
Module	9B	Chemistry

Findings identified during the design assessment of Module 9A, Radiological Protection, will be evaluated by the Project for applicability in Unit 2 and, if appropriate, corrective action steps will be verified implemented in Unit 2 program and practices.

Appendixes

The evaluation of the Unit 1 appendixes listed below has shown that the Unit 1 Readiness Review provided an adequate description and evaluation of the programs used for the Unit 2 work.

Appendix	C	Procurement
Appendix	D	Document Control
Appendix	E	Material Control
Appendix	G	Measuring and Test Equipment
Appendix	I	Quality Assurance
Appendix	J	Equipment Qualification

The Unit 1 RRFs for each of the above appendixes will be evaluated by the Project for applicability in Unit 2 and, if appropriate, corrective action steps will be verified implemented in Unit 2 programs and practices. Findings in appendixes C, D, and G had potential for affecting the overall acceptability of other quality programs and will receive follow-up in Unit 2 by Readiness Review.

Records

Unit 2 Readiness Review activities, within the scope of modules not planned for a full assessment and module report, are documented in records maintained in the Readiness Review files. Those records are generally the same as the back-up records maintained for modules with full assessments and reports, and include:

- o Project input for commitment implementation and "Unit 2 Action" to Unit 1 RRFs.
- o Updated implementation data base.
- o Updated Unit 1 RRF data base (Trends).
- Updated data base (findings) of findings, audits, and deficiency reports.
- o Executed checklists, RRFs and responses.
- o Records of Readiness Review investigations, including for example, the above evaluation of Unit 1 Assessment results.

The results of Readiness Review activities, within the scope of modules not planned for a module report, are reported to the Readiness Review Board.

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MODULE 1, REINFORCED CONCRETE STRUCTURES

Scope

Module 1 addresses the design, procurement, and construction of Category 1 reinforced concrete structures. Also included in the scope of this module is the turbine building as it may potentially affect Category 1 structures. Structures designated Category 2 and determined to not have a potential impact on Category 1 structures are not included in the scope of Readiness Review.

The evaluation of reinforced concrete structures includes design, procurement, and construction activities as they relate to concrete, reinforcing steel, and cadwelding within these structures. The post-tensioning system employed in the containment shell is covered in Module 13C.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activity is limited to a part 1 assessment (commitment implementation re-verification and corrective action follow-up).

Module Issue:

MODULE 3A, INITIAL TEST PROGRAM

Scope

Module 3A addresses the preoperational test phase of the Unit 2 Initial Test Program (ITP). Figure 3.4 illustrates how ITP activities are separated between the preoperational test phase and the startup test phase. For Unit 2, the startup test activities will be conducted using the controls and procedures developed for Unit 1 and will not be included in the Unit 2 Readiness Review program.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment. Construction Acceptance Testing is examined during the assessments performed for Modules 4, 6, 18A, and 20.

Module Preparation and Issue:

MODULE 4, MECHANICAL EQUIPMENT AND PIPING

Scope

Module 4 addresses the design, procurement, and construction work activities regarding safety-related mechanical equipment and piping systems classified as American Society of Mechanical Engineers (ASME) Section III, Classes 1, 2, and 3. Design and construction work activities typically associated with the mechanical discipline are addressed in several modules as indicated in Table 3.4-2.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current method of implementation.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 6, ELECTRICAL EQUIPMENT

Scope

The scope of this module includes those design, procurement, installation, and inspection activities associated with safety-related (Class IE) electrical equipment for Vogtle Electric Generating Plant (VEGP), Unit 2. The following categories of electrical equipment are included in this module:

- o Transformers.
- o Bus systems (including penetration assemblies).
- o Switchgear.
- o dc systems.
- o Motor control centers.
- o Boards and panels.
- o Distribution equipment.
- o Inverters.

Electrical motors are addressed in Modules 4, 16, 18A, and 20; wall-mounted electrical items other than transformers are addressed in Module 17; electrical instrumentation is addressed in Modules 18A and 20; attachment of equipment to supports is covered by this module; embed channels are covered in Module 8; concrete pads are covered in Module 1; and supports for bus systems are covered in Module 19.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Appendix 1 (Page 4 of 26)

Module Preparation and Issue:

MODULE 8, STRUCTURAL STEEL

Scope

Module 8 addresses design and construction work activities as they relate to structural steel utilized in Category 1 (seismic) structures. The structural steel within the scope of this module consist of embeds, structural steel framing for containment internals and other Category I structures, anchorage for structures and equipment, pipe whip restraints, cranes and supports, liner plate systems and miscellaneous Category I structural items. Also included in this module is discussion and verification of the welding program at the VEGP site, (i.e., procurement, control and issue of weld filler metals, welder qualifications, and weld procedure preparation). Welding processes applicable to structural steel are also addressed in this module.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 9A, RADIATION PROTECTION (SHIELDING)

Scope

Module 9A addresses the elements of the Health Physics department's radiation protection program and a discussion of radiation shielding design. For Unit 2, only the radiation shielding design is addressed.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 11, PIPE STRESS AND SUPPORTS

Scope

Module 11 addresses the design and construction work activities regarding pipe stress analysis and pipe supports for the Unit 2 safety-related mechanical systems classified as ASME Section III, Classes 1, 2, and 3, and non-safety-related systems supported to Seismic Category I requirements for protection of safety-related components.

Mechanical piping and equipment is addressed in Module 4, instrumentation is addressed in Module 20, and the piping and supports for the nuclear steam supply systems primary loop is addressed in Module 16.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 12, CABLES AND TERMINATIONS

Scope

The scope of this module includes those design, procurement, installation, and inspection activities associated with all Class 1E cables and terminations for VEGP, Unit 2.

This module covers cables up to the equipment termination block. Equipment internal wiring is addressed in Module 5.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 13A, FOUNDATION MATERIALS AND BACKFILL

Scope

The scope of this module includes those design and construction activities associated with foundation material (marl, lower sand stratum, etc.) design analyses, selection, and placement of Category I backfill.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 13B, COATINGS

Scope

Module 13B addresses the design and construction activities associated with protective coatings for the VEGP Unit 2. Coatings discussed in this module are those applied to the Unit 2 diesel generator fuel oil storage tank and those used within the Unit 2 containment.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 13C, POST-TENSIONED CONTAINMENT

Scope

The scope of this module includes the design and construction activities associated with the post-tensioning system employed in the containment shell.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 16, NUCLEAR STEAM SUPPLY SYSTEM

Scope

Module 16 addresses the design interface between Bechtel Power Corporation (BPC) and Westinghouse and the construction activities involved with the installation of primary loop equipment. Work activities considered Westinghouse generic are not addressed; however, this module addresses those Westinghouse activities considered Vogtle specific.

Other Westinghouse hardware supplied as part of the nuclear steam supply system package is addressed in the modules that contain similar hardware.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 17/19, ELECTRICAL RACEWAYS AND SUPPORTS

Scope

Module 17 addresses the design, procurement, installation, and inspection of conduit, cable trays, and special raceways containing safety-related cables for Class IE cables for VEGP Unit 2.

Module 19 addresses the design and construction activities associated with the supports and associated lateral bracing for electrical cable trays, conduit, pullboxes, and junction boxes for VEGP Unit 2 facilities. Also included in this module are electrical equipment supports. Electrical equipment directly mounted to building steel or floor embeds is addressed in Module 6.

For Unit 2, Modules 17 and 19 will be presented as a combined module entitled 17/19, Electrical Raceways and Supports.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 18A, HEATING, VENTILATION, AND AIR CONDITIONING

Scope

Module 18A addresses the design and construction activities associated with the safety-related and Seismic Category I heating, ventilation, and air conditioning (HVAC) systems for the VEGP Unit 2.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 18B, FIRE PROTECTION

Scope

This module identifies those Final Safety Analysis Report (FSAR) commitments for the Project Fire Protection Program for VEGP Unit 2.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 18C, DIESEL GENERATOR

Scope

Module 18C addresses the diesel generator and associated support systems, such as the air-start, lubricating oil, and fuel oil systems. The diesel generators quality assessment program, undertaken by the Project to address specific industry concerns regarding diesel generators, is also included.

Various other design and construction work activities associated with the diesel generators are addressed in other modules. Testing requirements are included within the scope of Module 3A, Initial Test Program, the electrical systems connecting to the diesel generator and the sequencer, are in the scope of Module 6, and the structure is in the scope of Module 1.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 20, INSTRUMENTATION AND CONTROLS

Scope

Module 20 addresses the design activities of BPC and the construction activities of Georgia Power Company (GPC), Cleveland Consolidated, and Pullman Power Products (PPP) for instrumentation and control (I&C). This module includes Pneumatic instruments but excludes electrical I&C panels (Module 6) and HVAC instrumentation (Module 18A). For Unit 2, the scope of the Module 20 includes installation of NSSS instrumentation.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 23, SECURITY

Scope

This module addresses the hardware, programs, and organizations that comprise the Unit 2 Physical Security Plan.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

APPENDIX 21C, PROCUREMENT

Scope

This appendix lists the commitments and their implementing documents for the programs for the procurement of equipment, material, and services for VEGP Unit 2.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

APPENDIX 21D, DOCUMENT CONTROL

Scope

This appendix lists the commitments and implementing documents for the document control and Quality Assurance (QA) records control program for VEGP during the design, construction, and pre-operational testing phases of the Project.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

APPENDIX 21E, MATERIAL CONTROL

Scope

The scope of Appendix 21E, Material Control, addresses permanent plant materials, parts, and equipment at VEGP from receipt through issue to contractors for installation. It also addresses equipment maintenance program activities from receipt through transfer to GPC Nuclear Operations.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

APPENDIX 21F, INSPECTOR QUALIFICATION AND CERTIFICATION

Scope

This appendix describes and assesses the construction organizations and their procedures which ensure that commitments for the qualification and certification of quality control inspectors are met. The requirements for inspector qualification and certification during the initial test program are described in Module 3A.

The individual modules describe and assess specific inspection activities and also address whether inspectors held the correct certifications during specific inspection activities.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

APPENDIX 21G, MEASURING AND TEST EQUIPMENT

Scope

This appendix provides a description and evaluation of the programs governing the control of measuring and test equipment (M&TE) utilized during construction activities of the VEGP. It is intended to describe the method of compliance with the Project commitments found in the FSAR. This appendix addresses the commitments and their implementation and determines whether appropriate procedures were in use and adhered to.

Included are descriptions of M&TE programs for GPC, PPP, and Nuclear Installation Services Company. Other onsite contractors made use of GPC's calibrated equipment when required for determining inspection acceptance of construction activities. Controls governing the M&TE program for procured equipment are part of the quality program required by the procurement specification. The procurement of equipment and services is discussed in Appendix 21C.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

APPENDIX 211, QUALITY ASSURANCE ORGANIZATION

Scope

The scope of this appendix encompasses the specific QA organizations involved in the Vogtle Project and the activities which are carried out by these organizations. As such, a major topic of this appendix is QA audits. The other QA program elements, such as inspection testing, procurement, etc. are covered in other modules on a functional basis or in other appendixes.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

APPENDIX 21J, EQUIPMENT QUALIFICATION

Scope

This appendix encompasses the procedures, methods, and controls governing the VEGP equipment qualification (EQ) program. This program covers safety-related equipment and project-specified post-accident monitoring equipment; however, the term "safety-related equipment" will be used throughout this appendix to mean "safety-related equipment and project-specified post-accident monitoring equipment".

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

3.5 UNIT 2 ASSESSMENT

3.5.1 PURPOSE

This procedure provides direction for the preparation and implementation of assessment plans for the Unit 2 Readiness Review program.

3.5.2 SCOPE

This procedure applies to the preparation and execution of assessment plans and evaluation of the collected data.

3.5.3 GENERAL

The scope of Unit 2 Readiness Review modules and appendixes is described in Section 3.4 of this manual and the type of assessments to be performed is described in Table 3.4-1.

3.5.3.1 Background Information

In development of the assessment plans, the Readiness Review Team will, as a minimum, review the sources listed below to determine the appropriate subjects for assessment:

- o Module commitment and implementation matrixes and their source documents (see Section 3.2 of this procedure).
 - Vogtle Electric Generating Plant (VEGP) Final Safety Analysis Report (FSAR).
 - Correspondence between VEGP and the Nuclear Regulatory Commission (NRC) containing commitments.
- o Findings and corrective actions from Unit 1 Readiness Review Program (see Section 3.3 of this procedure).
 - Trends matrix and the listed source documents.
 - Project programs and documents associated with the listings.

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- o Audit data bases (see Section 5 of this procedure).
 - Quality Assurance (QA) audit reports.
 - NRC inspection reports.
 - Special investigations.
- o Licensing Evaluation Reports.
- o Reports of industry problems.
- o Project Unit 1 lessons learned.
- o Quality Concerns.

In addition to review of the above sources, a review of the following will be performed for identification of specific issues for inclusion in the Unit 2 assessments:

Industry Problems

Same engineer or NSSS supplier as Vogtle. Recurring industry problems. Generic NRC concerns.

Quality Concerns

Valid violation of the Vogtle Project Quality program.

QA Audit Finding Reports

All Level I findings. Recurring finding topics.

NRC Violations

All that were against any Specification, Design Criteria, or FSAR requirements.

Unit 1 Readiness Review Findings

All Level I findings.
All collective significance findings.

NOTE:

For all of the above sources, any hardware issues that required rework or repairs.

3.5.3.2 Plan Content

The plan provides guidelines on the extent of evaluation to be conducted, assessment details, and selection and qualification of personnel implementing the plan.

Assessment activities for Unit 2 will be developed based on the Unit 1 Readiness Review and NRC findings, the status of completion of Unit 2 activities during Unit 1 Readiness Review, NRC violations and industry problems since the Unit 1 module assessment, and whether there have been significant changes in organization or program details for Unit 2 from that evaluated in Unit 1.

Assessment plans will be developed in three standard subdivisions identified as parts.

- o Part 1, Commitment Implementation and Corrective Actions.
- o Part 2, Design and Construction Programs and Activities.
- o Part 3, Design and Construction Completion, and Initial Test Program.

3.5.3.3 Plan Preparation, Approval, and Implementation

Assessments plans and checklists are prepared by the Readiness Review Team, reviewed and approved by the Readiness Review program manager and Readiness Review Board. The plans are implemented by Project QA in accordance with the details of the plan. Readiness Review will participate directly with QA and provide assistance as appropriate.

3.5.4 PERSONNEL

3.5.4.1 Responsibilities

Personnel responsibilities are defined in Section 2 of the Unit 2 Readiness Review Procedures with additional responsibilities, if any, as described herein.

3.5.4.2 Qualifications

o The qualifications of Readiness Review personnel are presented in Readiness Review Procedure 2.

- o The qualifications of Project QA personnel are presented in QA department procedure QA-05-01.
- o Technical specialists assigned to support QA assessment activities shall be qualified in accordance with procedure QA-05-01. The qualifications shall be subject to review by the Readiness Review program manager.

3.5.4.3 Assessment Plan Development

The assessment plans shall be developed in response to the objectives and guideline presented below.

3.5.4.4 Part 1 of Assessment Plans

The objective of Part 1 assessments and directions for implementing the plans are described below.

3.5.4.4.1 Objective

There are two primary objectives of Part 1 of each assessment plan:

- o Identification of Unit 2-specific commitments; identification of additions or revisions to Project licensing commitments as a result of FSAR amendments or Post-Unit 1 Readiness Review project letters to the NRC and verification of appropriate implementation of those commitments.
- O A review of findings as a result of the Unit 1 Readiness Review activities, examination of corrective actions taken by the Project in response to the Unit 1 Readiness Review Program, and the incorporation of those corrective actions into Unit 2 programs and procedures to preclude recurrence.

3.5.4.4.2 Sample Selection

Unit 2 Readiness Review assessments will address, to the extent possible, a selected safety-related system and safety-related services (electrical, controls, HVAC) to that system. A single system is assessed to facilitate evaluation of discipline interfaces. The system selected should exhibit a broad range of attributes in all disciplines. Interfaces with that system, or other systems, may be assessed if necessary to perform an acceptable assessment.

Utilizing appropriate sources as listed in Section 3.5.3.1, specific commitments are selected for review and verification of implementation in response to the following criteria:

- o Representative of Project activities on Unit 2.
- o Inclusion of all Unit l Readiness Review findings classified as Level I (having potential safety concerns) and all NRC violations that were;
 - within the scope of the module.
 - related to the Unit 1 Readiness Review Program.

and which addressed the licensing commitments or required corrective actions to demonstrate acceptable implementing actions.

- o Repr entative of commitments which were revised or adde subsequent to publication of the Unit 1 module.
- o Include selected commitments identified to Module 21A in the commitment matrix.
- o Include a sample of Project-provided implementation to new or changed commitments.

3.5.4.4.3 Sample Size

Sample size is not fixed, but must, as a minimum, include all Level I Readiness Review findings and NRC violations that resulted from their review of the Unit 1 modules as described in Section 3.5.4.4.2 above. In addition, utilizing the implementation matrix as updated by the Project, the sample shall include a sufficient number of commitments to demonstrate confidence in the accuracy of the matrix and adequate to represent identified or potential concerns.

3.5.4.4.4 Implementation Details

The commitments selected for verification shall be examined for the following characteristics:

o The commitment, as stated, reflects the intent of the source document.

o Implementation, as described in the implementation matrix, is usually sufficient to demonstrate compliance with the commitment and review may be limited to documenting Project implementation of the commitment in documents such as Design Criteria, Piping and Instrument diagrams, one-line diagrams, construction specifications, construction procedures, start-up procedures, etc. If deemed necessary by the Readiness Review Team to develop additional assurance, additional documents such as calculations, installation drawings, isometrics, installation records, desktop instructions, etc., may also be reviewed and implementation documented in those documents.

3.5.4.5 Part 2, Programs and Activities

3.5.4.5.1 Objective

The primary objective of Part 2 of the assessment plans is assess on-going Project programs and activities to determine whether Unit 2 design, construction, and preoperational test phase activities continue to conform to program requirements. Other objectives to be addressed in Part 2 include:

- o Review of continued acceptability of response to design and construction related problems identified during the Unit 1 Readiness Review.
- o Review and evaluation of the acceptability and implementation of significant changes in programs, procedures, or responsibilities for Unit 2 activities, if any.
- O Assessment of the technical adequacy of selected design documents such as calculations and demonstration of necessary interface activity.
- o Assessment of ongoing construction activities to demonstrate appropriate response to design details and construction-related procedures, personnel qualification status, material control, etc.

3.5.4.5.2 Sample Size

Sample size (number of documents, number of welds, tag-numbered items, etc.) shall be established by the Readiness Review Team in consideration of the following criteria:

- o The sample shall reflect the status of construction completion of Unit 2 activities at the time of the Unit 1 assessment.
- o The sample shall reflect extent (isolated versus generic) of the deficiencies identified during the Unit 1 Readiness Review assessments.
- o The sample shall reflect the frequency of QA audit findings and NRC violations, unresolved items, and inspector follow-up items for audits and inspections performed subsequent to publication of the Unit 1 Readiness Review modules.
- o The sample shall reflect the need to examine and demonstrate confidence in Project response to new or revised programs.

The Readiness Review Team is to consider the need for the imposition of an increased sample size should early results of assessments indicate problem areas.

3.5.4.5.3 Implementation Details

The plan prepared by the Readiness Review Team shall identify specific characteristics to be assessed to meet the objectives described in Section 3.5.4.4.1, above. These characteristics shall be identified on checklists described below in Section 3.5.6.

In addition to the checklists, guidelines and directions shall be provided to the QA assessor in the event specific documents, equipment, piping isometrics selected for examination are incomplete, inaccessible, or unavailable for other reasons (see Section 3.5.5, below).

3.5.4.6 Part 3, Design and Construction Completion

Part 3 of the assessment plan addresses design completion activities, acceptability of installed hardware, acceptability and retrievability of completed quality records developed during design and construction activities, and the Preoperational Test Phase program.

3.5.4.6.1 Objective

There are three distinct objectives to Part 3 of the assessment plan as listed below:

- o Evaluation of the design completion activities such as the finalization programs (design verification), change control packages, interface activities, and design change control.
- Evaluation of as-installed product acceptability and the availability and retrievability of quality records.
- o Evaluation of the Preoperational Test Phase. (Construction Acceptance Tests and Preoperational Tests).

3.5.4.6.2 Sample Selection

Unit 2 Readiness Review assessments will address programs and activities appropriate to the systems described in Section 3.5.4.4.2.

Utilizing the sources described in Section 3.5.3.1, the Readiness Review Team will select general categories of documents for review and specific portions of systems being installed for evaluations. Alternatively, the team may select specific tag number items and prepare checklists (or assessment guides if checklists are inappropriate) for use by Readiness Review and QA personnel performing assessments. The sample to be assessed shall be selected in response to the following criteria:

- o Representative of Project activities on Unit 2.
- o Inclusion of all Unit 1 Readiness Review findings classified as Level I (having potential safety significance) and all NRC violations that were,
 - within the scope of the module.
 - related to the Unit 1 Readiness Review Program.
- o Inclusion of significant QA audit results (Audit Finding Reports [AFRs], Corrective Action Reports [CARs]) from audit reports not considered in the Unit 1 assessments.
- o Inclusion, as appropriate, of NRC identified deficiencies (violations, unresolved items, inspector follow-up items) from inspections subsequent to Unit 1 module publication.

- o Consideration of Georgia Power Company (GPC)-generated reports of potential deficiencies (construction deficiency reports).
- Consideration of deficiencies determined to be reportable.
- o Consideration of NRC pulletins and notices.
- o Consideration of significant industry problems identified subsequent to Unit 1 module assessment.
- Inclusion of significant changes in Project programs, organizational responsibilities, and Unit 2-specific design aspects.
- o Consideration of deficiencies identified in the Quality Concerns program.

Programs and activities found acceptable during the Unit 1 Readiness Review assessments need not be re-assessed unless reviews conducted in response to the selection criteria described above results in a potential concern.

3.5.4.6.3 Sample Size

Sample size (number of documents, number of welds, tag-numbered items, etc.) shall be established by the Readiness Review Team in consideration of the following criteria:

- o The sample shall reflect the status of construction completion of Unit 2 activities at the time of the Unit 1 assessment.
- o The sample shall reflect extent (isolated versus generic) of the deficiencies identified during the Unit 1 Readiness Review assessments.
- o The sample shall consider the frequency and significance of similar QA audit findings and NRC violations, unresolved items, and inspector follow-up items for audits and inspections performed subsequent to publication of the Unit 1 Readiness Review modules.
- o The sample shall reflect the need to examine and demonstrate confidence in Project response to new or revised programs.

The Readiness Review Team is to consider the need for the imposition of an increased sample size should early results of assessments indicates problem areas.

3.5.4.6.4 Implementation Details

The plan prepared by the Readiness Review Team shall identify specific characteristics to be assessed to meet the objectives described in Section 3.5.4.4.1, above. These characteristics shall be identified on checklists described below in Section 3.5.6.

In addition to the checklists, guidelines and directions shall be provided to the QA assessor in the event specific documents, equipment, piping isometrics selected for examination are incomplete, inaccessible, or unavailable for other reasons (see Section 3.5.5, below).

3.5.5 ASSESSMENT SAMPLE DELETION OR SUBSTITUTION

The specific samples to be assessed are selected by Readiness Review after consideration of availability, completion status, access, etc. Based on the Unit 1 assessments, substitutions or deletions of specific checklist items will occur due to un-anticipated conditions. To minimize the frequency of such occurrences, the following recommendations shall be considered.

o Identify alternate samples or a generic class of samples (e.g., specify 2 calculations, 10 welds from these 3 isometrics, 1 of these 2 heat exchangers, review certified material test reports for 3 heats of weld filler metal, etc.).

In the event alternate samples are not identified, the assessor shall notify the responsible Readiness Review team leader if the prescribed sample cannot be assessed. The team leader shall identify an alternate sample, or with the concurrence of the Readiness Review program manager authorize deletion of the assessment, delay the assessment, or transfer the assessment activity to another module.

3.5.6 CHECKLISTS

The Readiness Review Team prepares checklists as a means of assuring consideration of specific attributes or characteristics to be evaluated during assessment activities.

3.5.6.1 Format

Checklists are prepared by Readiness Review on the form shown in Figure 3.5-1. For each checklist, the following items shall be entered by Readiness Review:

- o Checklist originator and date.
- o Sample identification.
 - Short description and information to be recorded by auditor for tracking item/documents examined.
- o For each checklist element or grouping of characteristics, the originator shall record the following information on the checklist:
 - Checklist item number for each entry.
 - Reference to source of specific requirement of characteristic to be examined (e.g., Project Reference Manual, Part C, 4.3.1.A, Pullman Power Products Procedure IX-18, paragraph 4.3.2, etc.). Characteristics or requirements which are assessed to evaluate the response to Readiness Review Unit 1 findings or NRC violations shall show a reference to the finding/violation.
 - The specific characteristics to be examined.
 Directions concerning the sample and sample size to be assessed may also be added if appropriate.

3.5.6.2 Checklist Preparation

The assessment plan checklists shall identify the selected characteristics and/or attributes to be evaluated for the sample items. Examples of characteristics or attributes that may be appropriate include:

- Objective evidence of commitment implementation in calculations, specifications, drawings, and procedures.
- Objective evidence of appropriate review and/or approval functions (including discipline chief's reviews) as applicable for calculations, drawings, specifications, design criteria, change documents, and Deviation Reports (DRs).

- Objective evidence that change documents [Design Change Notices (DCNs), Field Change Requests (FCRs), Supplier Deviation Disposition Requests (SDDRs), DRs, etc.] do not infringe upon licensing commitments unless covered by an approved Licensing Document Deviation (LDD).
- o Objective evidence that calculation results are correctly reflected in drawings, specifications, etc.
- Objective evidence that, where required, inputs to calculations are correct and/or that calculation output, where required, is correctly factored into other approved calculations or designs.
- Objective evidence that results and assumptions of calculations are consistent with the design criteria and licensing commitments.
- Objective evidence of inter-discipline design coordination, when appropriate, for drawings, specifications, and design change documents.
- o Objective evidence of design coordination between the Project and off-Project design groups.
- Objective evidence that design change documents including DRs, FCRs, and SDDRs, as appropriate, are incorporated into design drawings and specifications.
- O Evidence that requirements for maintenance, storage, installation, and testing have been adequately addressed by appropriate procedures, instructions, and inspection reports.
- o Evidence of acceptable calibration status of tools or other items of measuring and test equipment (M&TE) used at the time of the activity.
- o Objective evidence that records are traceable to the activity and are complete, accurate, and signed off as required.
- Objective evidence that prerequisite requirements were performed.
- Evidence that Quality Control (QC) personnel are appropriately certified.
- O Evidence that exceptions noted on selected records have been identified on DRs as appropriate.

- o Evidence that DRs have been properly dispositioned, justification statements are included for required dispositions, and that each closed report is signed by QC.
- Evidence that any required test records are available, complete, accurate, retrievable, and acceptable per applicable requirements.
- o Evidence that key installation attributes such as location, orientation, mounting, welding, connections, configuration, separation, and identification are in accordance with design/vendor requirements.

3.5.6.3 Completion of Checklist

Checklists are used as a guide during assessment activities. The characteristic or attribute (requirement) to be assessed is reviewed within the context to the identified reference and the list of questions and/or directions.

3.5.6.3.1 Assessment Results

A record of the documents or hardware reviewed must be maintained (either on the checklist or on an attachment referencing the item number) to establish the basis for the entry in the "accept" or "reject" columns. In addition to identifying the specific sample, the "finding/comment" column is to 0: used for description of the actual conditions found and the reasoning for establishing the accept/reject status.

If the condition found is unacceptable, the "reject" column is checked and the AFR, CAR, or Readiness Review Finding (RRF) number is recorded in the "resolution" column.

3.5.6.3.2 Inapplicable Requirements

Certain characteristics or attributes specified in the checklist may not be applicable to the specific sample being evaluated. If this occurs, the assessor will enter "N/A" (not applicable) in the "finding/comment" column with a short statement of explanation. Readiness Review concurrence is required prior to closure of the checklist.

3.5.6.3.3 Unverified Requirements

In the event the assessor is unable to perform the required examination or review (no access, no work in progress, etc.), the assessor will enter "N/V" (not verified) in the "finding/comment" column with an explanatory statement. Readiness Review concurrence is required prior to closure of the checklist.

3.5.6.3.4 Checklist Closure

The signature of the assessor in the "performed by" box indicates the assessor has completed his assessment, has reviewed the accuracy of the entries, and has included appropriate backup documentation and records in the checklist package.

The checklist package is reviewed by the Readiness Review team leader and the signature in that box attests to acceptability of the package and conclusions.

3.5.7 EVALUATION OF ASSESSMENT RESULTS

The Readiness Review Task Force will review the checklists and backup data for the purpose of:

- Assuring completeness and acceptability of responses to checklist requirements.
- Identifying and verifying accuracy of reported deficiencies.

3.5.7.1 Review of Response to Findings

The Readiness Review Task Force will evaluate responses to deficiencies reported on RRFs, GPC QA AFRs, or Bechtel QA CARs in response to Section 8.2 of this procedure.

The review shall address the subjects described in the "General Guidelines for Responding to Readiness Review Findings" as printed on the back side of the RRF form for all RRFs, AFRs, and CARs. Additionally, the response shall be evaluated for the following:

- o Does it adequately address the identified deficiency?
- o Is it complete?

- o Is the action plan (if necessary) adequate to preclude future recurrence of the deficient conditions and is the schedule for corrective actions acceptable?
- o Does the deficiency indicate that corrective actions as a result of the Unit 1 Readiness Review Program are inadequate or have not been extended to Unit 2?

Findings shall also be evaluated for collective significance when considered with findings from other modules, QA audits, and NRC inspections.

3.5.7.2 Assessment of Significance

The team, after reviewing the finding response and upon consultation with the program manager, shall classify findings into levels of importance based on potential impact to plant safety. The following levels are used:

- Violation of licensing commitments, project procedures, or engineering requirements with indication of safety concern.
- II. Violation of licensing commitments or engineering requirements with no safety concerns.
- III. Violation of project procedures with no safety concerns.
- IV. Non-finding based on additional information/clarification supplied by the Project.

The level shall be indicated at the bottom of the finding form by adding the word "level" and the appropriate roman numeral, or by checking the appropriate box in the verification block as provided by the current revision to the RRF (Figure 8.2-1) form.

3.5.7.3 Assessment Plan Closeout

The Readiness Review Team shall include the assessment plan, checklists, and backup documentation in the Readiness Review module files. Prior to filing, the documents shall be checked to verify that all deficient items have been addressed and that necessary information and documents are included to support the checklist entries.

READINESS REVIEW CHECKLIST NO. RR-PREPARED BY AUDIT NO PAGE OF SAMPLE DENTIFICATION AUDIT DATE AREA AUDITORS REFERENCE REQUIREMENT FINDING / COMMENT ACCEPT REJECT RESOLUTION PERFORMED BY DATE DATE R R TEAM LEADER

Figure 3.5-1 Readiness Review Program Checklist

4. READINESS REVIEW TASK FORCE - QUALITY ASSURANCE INTERFACE

4.1 PURPOSE

This procedure describes the interface between the Readiness Review Task Force and Quality Assurance (QA) elements of the Readiness Review program organization.

4.2 SCOPE

This procedure applies to the Readiness Review Task Force and the QA Department during implementation of the Unit 2 Réadiness Review Assessment Process.

4.3 RESPONSIBILITIES

Readiness Review Task Force

- o Define module scope.
- Prepare an assessment plan including checklists and detailed instructions.
- o Prepare a milestone schedule for the module.
- o Obtain Readiness Review Board approval of the module scope and plan.
- o Present findings and responses to Readiness Review Board.
- o Provide support to QA as required for implementation of the assessment plan.
- o Prepare draft Unit 2 module and obtain comments.

Quality Assurance

- o Perform detailed planning to incorporate the assessment plan into a QA audit and the approved tentative audit schedule.
- o Assign personnel, perform the audit and verify the checklist items in accordance with applicable QA procedures.

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- Provide day-to-day direction for any technical personnel assigned to the audit.
- o Issue, track, and close findings.
- o Review, provide input, and concur with Unit 2 module assessment conclusions.
- o Provide a statement as to the adequacy of the work activities presented by the module.

4.4 INTERFACE ACTIVITIES

- o The Readiness Review Task Force will forward the draft assessment plan for each module supplement to the Vogtle QA manager for comment before submission of the plan to the Readiness Review Board for approval.
- o Upon approval by the Readiness Review Board, the assessment plan will be forwarded to the Vogtle QA manager for implementation.
- o QA will schedule initial meetings or initiate communications to advise Readiness Review of planning progress, the audit schedule and requirements for technical support and to resolve any problems with incorporating the assessment plan into a QA audit.
- o QA shall provide the Readiness Review Task Force the opportunity to comment on findings and closures prior to issuance or acceptance.
- o Findings issued by QA as a result of Readiness Review assessment activities shall be clearly identified as such.
- o In the event that the audit results in concerns by either QA or Readiness Review that are not shared, or considered out-of-scope, the concerned entity shall issue, track, and close their own findings following their applicable procedures.
- O Upon completion of the audit QA will forward copies of the executed checklists to the Readiness Review Task Force.
- o QA will provide the Readiness Review Task Force the opportunity to comment on any report of the audit prior to issuance.

o The Readiness Review Task Force will provide QA with the draft Unit 2 module for review.

QA will concur with the assessment conclusions, and provide a statement as to the adequacy of the work activities presented by the module.

5. PREPARATION OF UNIT 2 MODULES

5.1 PURPOSE

This procedure provides guidelines for the contents and general format of modules and appendixes.

5.2 SCOPE

This procedure applies to module/appendix documents prepared by the Readiness Review Task Force.

5.3 RESPONSIBILITIES

The Readiness Review program manager is responsible for the overall implementation of the Readiness Review program.

The Readiness Review team leaders are responsible for ensuring that the modules/appendixes conform to the requirements of this procedure.

5.4 MODULE CONTENT

The following are general guidelines for the format and contents of modules/appendixes. Adjustments will be made in cases which warrant change.

Preface

This section will describe the scope and methodology of the Readiness Review program.

Executive Summary

This section will contain the assessments of the Readiness Review Team and Board for the specific module.

Introduction (1.)

This section will present the scope and boundaries for discussion within the specific module, identify in general the completion status of project work covered, and planned completion schedule.

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Organization (2.)

This section will present organization charts and identify the current project group(s) responsible for the work covered by the module.

Commitments (3.)

This section will present a matrix of the project licensing commitments for the work covered by the module as found in the Vogtle Electric Generating Plant Final Safety Analysis Report (FSAR), responses to generic letters, and other documents.

The commitment matrix will identify, by notation in the left margin, any changes in commitments from that identified in the Unit 1 modules. This section will also contain an implementation matrix which identifies the method of implementation for each commitment. The FSAR amendment used in establishment of the commitment matrix and the date commitment implementation verification was completed will be stated in Section 3.

Program Description (4.)

This section will identify the Vogtle Project work activities and programs utilized to control work within the scope of the module. Additionally, this section will identify the controlling project design criteria, specifications, and procedures that control work activities. Significant program changes since Unit 1 will be identified in this section.

Audits, Nuclear Regulatory Commission (NRC) Inspections, Special Investigations and Unit 1 Finding Follow-up (5.)

This section will identify in matrix form, the Quality Assurance (QA) a dits and findings issued and the NRC inspections performed and findings issued on work activities or programs as they apply to a particular module. Also included will be a description of any special investigations (or reportable deficiencies) within the scope of the module and a list of Readiness Review and NRC findings as a result of Unit 1 Readiness Review, indicating their applicability to Unit 2 and, if applicable, corrective actions taken to work processes or programs. Section 5.0 will be arranged as follows:

- o 5.1 Quality Assurance Audits;
- o 5.2 NRC Inspections;

- o 5.3 Special Investigations;
- o 5.4 Unit 1 Readiness Review and NRC Readiness Review findings (RRFs).

Program Assessment (6.)

This section will describe the assessment activities conducted to verify proper implementation of commitments and conformance to project procedures and requirements, including the assessment plan development, implementation, and results.

The section will include discussions, in subsection 6.3, of Readiness Review or Project activities which bear on the assessment, but were conducted outside or in preparation of, the formal module assessment plan. The discussion should show how these activities affected the module assessment or conclusions. Examples of such activities include (as appropriate to the module):

- O Project Quality Concern investigations and Readiness Review screening of Quality Concerns.
- o Readiness Review screening of NRC Inspection and Enforcement (I&E) Bulletins.
- o Project QA's independent review and verification of corrective action to NRC and Unit 1 RRFs.
- o Readiness Review screening and factoring into Unit 2 assessment plans, as appropriate, of occurrences in Unit 1 start-up and operation.

Section 6. will be organized as follows:

- o 6.1 Introduction;
- o 6.2 Program Description;
- o 6.3 Summary and Conclusions;
- o 6.4 Assessment Activities and Results;
- o 6.5 Unit 2 Findings.

Assessment of Module Adequacy (7.)

This section will contain statements from the Project organizations being assessed, Project QA, and the Readiness Review Board attesting to the accuracy of the information contained herein and the adequacy of the work under review.

Assessment Plan and Checklists (8.)

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5.5 WRITING OF MODULES AND GENERAL APPENDIXES

When data has been collected through the use of the commitment matrix, implementation matrix, the audit matrix, assessment checklists (reference procedure 6.0), and other appropriate means, team members consolidate the information into the module or general appendix format and prepare a draft of the module/general appendix.

When a complete draft of a section of the module or general appendix is finished, copies of the section will be distributed for comments to the following individuals:

- o Readiness Review Board module sponsors;
- o Readiness Review program manager;
- o Team leader(s);
- o QA;
- o Project.

Each draft will contain a cover page outlining the distribution and stating the date all comments are to be returned. The comment period will normally be seven days.

All comments will be made clearly on the draft copies and returned to the team leader for consideration. If necessary, the team leader will schedule a meeting to resolve comments.

The team leader will review the final draft for:

- o Technical accuracy;
- o Technical adequacy;

- o Completeness of discussion;
- o Format;
- o Clarity of writing/illustrations;
- G Grammatical correctness.

The completed module is then issued for review in accordance with Section 6 of this manual.

TYPICAL MODULE FORMAT

Preface

Executive Summary

- 1. Introduction
- 2. Organization
- 3. Commitments
- 4. Program Description
- 5. Audits, NRC Inspections, Special Investigations, and Unit 1 Findings
- 6. Program Assessment
- 7. Assessment of Module Adequacy
- 8. Assessment Plan and Checklists

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6. ASSESSMENT OF MODULE ADEQUACY

6.1 PURPOSE

The purpose of this procedure is to define the process, requirements, and responsibility for assessing the adequacy of the Unit 2 Readiness Review modules.

6.2 SCOPE

This procedure applies to the evaluation of Unit 2 Readiness Review modules by the Readiness Review Task Force, the responsible project organizations, Project Quality Assurance, and the Readiness Review Board.

6.3 RESPONSIBILITIES

The Readiness Review Program Manager is responsible for the overall implementation of the Readiness Review Program procedures.

Readiness Review Team members are responsible for performing an assessment of each module during the development process.

It is the responsibility of the project general managers and their staffs to evaluate appropriate module sections covering their areas of the work effort.

The Readiness Review Board Chairman is responsible to summarize the consensus assessment by the Readiness Review Board for each module submitted. Evidence of this consensus will be recorded in the Readiness Review Board meeting minutes and such statement will be included in each module.

6.4 GENERAL

Each module shall have an "Assessment of Module Adequacy", Section 7, which shall contain as a minimum:

o A statement by the appropriate project organizations attesting to the accuracy of the module and acceptability of the work activities covered by the module.

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- o A statement of certification as to the accuracy and technical correctness of the module's conclusion by the Readiness Review Program Manager.
- o A Quality Assurance statement attesting to the adequacy of the work activities covered by the module and as noted during the audit/assessment of those activities.
- o A statement of acceptance of the module and its conclusion by the Readiness Review Board.

6.5 ASSESSMENT PROCEDURE

6.5.1 READINESS REVIEW TEAM MEMBERS

Readiness Review Team members collect data and perform verification for the module in accordance with sections 3, 4, 5, and 8 of this manual. The evaluation of the data, including Project responses to findings, is factored into the conclusions and is presented to the Readiness Review Board by the team leader(s). The conclusion shall be included in the executive summary and/or other appropriate sections of the module.

6.5.2 RESPONSIBLE PROJECT ORGANIZATIONS

Department managers whose line supervisors are or have been responsible for the work identified in a module will be requested to conduct an internal assessment of the module. This assessment will include an evaluation of the appropriate module sections for the correctness and completeness of the description of their work, activities, or responsibility.

The assessment is to be documented by signature of appropriate project management on a letter, or other suitable means, signifying concurrence with the module.

6.5.3 QUALITY ASSURANCE

Project Quality Assurance is responsible for incorporating assessment plans prepared by Readiness Review into audits, verification of checklist items, and providing audit results to Readiness Review. Upon issuance of the draft module, Quality Assurance is responsible for reviewing the information contained, for concurrence with conclusions, and for providing a statement as to the adequacy of the work activities presented by the module.

6.5.4 READINESS REVIEW PROGRAM MANAGER

Upon completion of the module, the Readiness Review Program Manager shall provide a statement attesting to the accuracy of the module.

6.5.5 READINESS REVIEW BOARD

The following activities provide the basis for board assessment of the module. These activities may be accomplished by the assignment of module sponsors who act on behalf of the Board and provide status to the Board.

- o Reviews and approves module scoping.
- o Reviews and approves each assessment plan.
- o Reviews and provides guidance on development of assessment policies and processes.
- o Monitors assessment activities by means of presentations from the Readiness Review Program manager and Readiness Review Program staff.
- o Reviews and assesses the resolution of module findings.
- o Reviews and comments on the module.
- o Reviews and accepts, where found to be acceptate, module conclusions.

Upon completion of these activities, the chairman of the Readiness Review Board shall prepare and sign a statement of consensus acceptance of the module contents and conclusions for inclusion in the module.

8. ADMINISTRATIVE CONTROLS

8.1 PROCEDURE PREPARATION AND CONTROL

8.1.1 PURPOSE

The purpose of this procedure is to define the responsibilities and the requirements for the preparation, approval, and control of the Vogtle Project Readiness Review program procedures and revisions.

8.1.2 SCOPE

This procedure applies to procedures required to implement the Readiness Review program.

8.1.3 RESPONSIBILITIES

The Readiness Review program manager is the final approval authority for Readiness Review program procedures and is responsible for the overall implementation of the Readiness Review program procedures manual.

The individual manual holders are responsible for the configuration of their manuals.

8.1.4 FORMAT

The title of the manual shall appear at the top of each page of this manual.

The issue date shall appear in the upper right corner of each page of each procedure.

The bottom line of the first page of each procedure shall contain the revision number, the revision date, and the approval signature of the Readiness Review program manager.

Revisions to procedures shall be indicated by a change bar in the right margin, numbered corresponding to revision number, indicating the lines that were changed from the preceding revision.

Revision: O Issue Date: September 28, 1987

Readiness Review Program Manager

Figures and illustrations will be placed at the end of the procedures and numbered using the procedure number plus another sequential number beginning with one (e.g., 8.1-1 would be the first figure/illustration to this procedure).

8.1.5 CONTENT

Each procedure shall have a statement of purpose which clearly defines the objective of the procedure.

Following the statement of purpose, each procedure shall have a scope statement which clearly defines the intended applicability of the procedure.

Following the scope statement, each procedure shall have a statement or statements which clearly define responsibilities for implementation.

Each procedure shall, at a minimum, contain sufficient description to identify what must be done and when, where, how, and by whom it is to be accomplished.

8.1.6 INITIATION

Any member of the Readiness Review Team may initiate a draft procedure or draft revision to a procedure for consideration by the Readiness Review program manager.

Drafts considered appropriate by the Readiness Review program manager shall be distributed to the task force members for detailed review.

Comments generated from this review shall be forwarded to the draft originator for resolution.

The originator shall disposition and attempt to resolve all comments. Comments that cannot be resolved in this manner shall be presented to the Readiness Review program manager who will provide final resolution.

Upon resolution of comments, the procedure shall be presented to the program manager for approval signature.

8.1.7 DISPOSITION, RETURN, AND TRANSFER OF MANUALS

The distribution of the Vogtle Project Readiness Review Program Procedures Manual shall be as follows:

- o The Readiness Review program manager shall designate those individuals to be assigned controlled copies of the manual.
- o The Readiness Review program manager shall maintain a controlled distribution list, assign copy numbers, and issue the procedures manuals and subsequent revisions.
- o Manual holders shall notify the Readiness Review program manager via memo and return the manual when the manual is no longer required.
- o Manual holders shall notify the Readiness Review program manager via memo when a manual is being transferred to another individual.

8.2 DEFICIENCY REPORTING

8.2.1 PURPOSE

The purpose of this procedure is to define the methods by which items or activities considered by the Readiness Review Team to be in noncompliance to project commitments, specifications, drawings, or procedures, are identified, reported to the responsible organizations, tracked, and resolved to the satisfaction of the Readiness Review Team. This procedure is not intended to bypass, in part or wholly, existing project deviation reporting systems.

8.2.2 SCOPE

This procedure applies to items found by Readiness Review Team members which are determined to be in noncompliance with project commitments, specifications, drawings, or procedures.

8.2.3 RESPONSIBILITIES

8.2.3.1 Readiness Review Program Manager

The Readiness Review program manager is responsible for overall implementation of the Readiness Review program.

8.2.3.2 Readiness Review Team Members

The Readiness Review Team members are responsible for identifying findings, identifying responsible responding organizations, obtaining commitment dates compatible with module schedules, and acceptance of project resolutions. In addition, team members are responsible for ensuring that findings and appropriate response documentation are retained in the Readiness Review permanent files.

8.2.3.3 Clerk

The Readiness Review clerk is responsible for maintaining the Readiness Review Finding (RRF) log book and assigning unique numbers to the RRFs as requested by the team leaders. The clerk makes distribution of RRFs as required.

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Readiness Review Program Manager

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8.2.3.4 Quality Assurance

Quality Assurance (QA) is responsible for reviewing each RRF for potentially reportable conditions in accordance with QA department procedures.

NOTE

Engineering, Construction, and Readiness Review are responsible for notifying QA of any identified potentially reportable conditions as per Project Policies and Procedures Manual, Procedure 7.2.

8.2.3.5 Responsible Organization Managers

The responsible organization managers are to provide timely and complete responses. The responsible manager's signature is required for all final responses (see section 8.2.4.3).

8.2.4 INITIATION AND PROCESSING

8.2.4.1 Initiation

Readiness Review Team members, upon discovery of an apparent noncompliance to project commitments, specifications, drawings, or procedures, shall initiate a RRF on the RRF form (see Figure 8.2-1) citing the requirement and the apparent noncompliance. All initiated RRFs are then forwarded to the team leader for review.

The Readiness Review team leader shall evaluate the finding and determine whether the identified noncompliance appears to be valid. If the finding is judged to be valid, the team member shall enter on the form, the organization(s) responsible for resolution, the required response date in the appropriate block, the unique RRF number obtained from the Readiness Review Task Force clerk, his name in the originator's box, and the date in the adjacent box.

If the RRF is determined by the team leader to be invalid, the team leader shall enter an explanation on the form and return the finding to the originator.

NOTE

The originator, at any time, may discuss with the program manager deficiencies rejected by the team leader the originator considers valid.

After approval by the team leader, the finding is forwarded to the program manager for his approval.

8.2.4.2 Processing

A copy of the RRF will be transmitted by memo from the Readiness Review program manager to the responsible organization for resolution. Copies of the transmittal shall be forwarded to the Project director, functional organizational manager against which the finding is written, Unit 1 Nuclear Operations - Nuclear Safety and Compliance, Project QA for review for reportability, and the finding originator. Copies of findings identified during Module 23, Plant Security, assessment activities will be forwarded to the Plant Security manager instead of QA for evaluation.

The original is filed subsequently in the RRF log book. For findings issued by QA, Readiness Review receives a copy and files it in the RRF log book.

8.2.5 RESOLUTION AND CLOSURE

NOTE

This procedure section addresses RRFs and findings (Audit Finding Reports issued by GPC QA, Corrective Action Requests issued by Bechtel QA) issued by QA while performing a Readiness Review function.

8.2.5.1 Resolution

As defined in the guidelines on Figure 8.2-1, Sheet 2, the responding organization will perform remedial, investigative, and corrective action, as required, to resolve the finding. The response should identify the root cause of the discrepancy, the extent, any actual or potential impact upon hardware, and a

2

summation of the significance of the discrepancy, as appropriate.

When appropriate, the responsible organization should initiate and issue any Deviation Reports (DRs), Deficiency Evaluation Reports (DERs), or other reporting forms as required by applicable QA program requirements.

A complete resolution response should be contained on an attachment to the the finding. Copies of related DRs, DERs, etc. should be attached as appropriate. The response shall reference the finding and be signed and dated by the manager having tesponsibility for the work, (e.g., department manager construction findings) and returned promptly to the originating organization. Copies shall be distributed to Project QA and Readiness Review as appropriate.

NOTE

In the event all required actions cannot be completed in time to support the module publication, the response should provide a suitable action plan, including commitment dates.

8.2.5.2 Evaluation of Project Response

Upon receipt of the finding response, the appropriate team shall evaluate the response for acceptability. Acceptable responses shall be approved by the originator and Readiness Review program manager and subsequently filed in the RRF log. The RRF tracking log shall also be closed out.

If rejected, the responsible organization shall immediately be verbally informed of the reasons for rejection with a memo following to that effect.

After resolution, copies of the finding and response shall be transmitted to the originator, Project QA (Plant Security manager for Module 23), Unit 1 Nuclear Operations - Nuclear Safety and Compliance, and Readiness Review.

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8.2.5.3 Assessment of Significance

The team, after reviswing the finding response and upon consultation with the program manager, shall classify findings into levels of importance based on potential impact to plant safety. The following levels are used:

- Violation of licensing commitments, project procedures, or engineering requirements with indication of safety concern.
- II. Violation of licensing commitments or engineering requirements with no safety concerns.
- III. Violation of project procedures with no safety concerns.
- IV. Non-finding based on additional information/clarification supplied by the Project.

The level shall be indicated at the bottom of the finding form by adding the word "level" and the appropriate roman numeral, or by checking the appropriate box in the verification block as provided by the current revision to the RRF (Figure 8.2-1) form.

2RRF	DATE RESPONSIBLE ORGANIZATION
REQUIREMENTS:	
TAIDING.	
FINDING:	
TEAM LEADER APPROVAL	RESPONSE
LEVEL OI OII OII OIV	DUE DATE:
	The state of the s
RESPONSE ACCEPTANCE ACCEPTED BY ORIGINATOR	DATE

Figure 8.2-1
Readiness Review Finding Form (Sheet 1 of 2)

Response guidelines are shown on the reverse side

General Guidelines for Responding To Readiness Review Findings

Responses to Readiness Review findings are to be type-written with each clearly indicating the finding number and the person to contact in regard to the response. Each response must be approved by manager level or nigher.

For each finding, the response must address:

I. INVESTIGATIVE ACTION

- What is the extent of the problem? Additional sampling for like deficiencies should be considered unless it can be adequately demonstrated that the finding is isolated or has already been determined to be generic.
- What is the significance of the specific deficiency? Is there any impact, actual or potential, on hardware, technical adequacy, test results, etc.?
- What is the collective significance of similar deficiencies noted by additional sampling or other Readiness Review Lindings?
- What is the root cause of the deficiency(s)?

II. REMEDIAL ACTION

- What has been done to correct the specific identified deficiencies?
- What has been done to correct like discrepancies identified during the investigative process?
- What has been done to resolve other similar problems when it is determined a generic deficiency exists?

111. ACTION TO PREVENT RECURRENCE

 What actions have been taken to assure that repetitive/generic deficiencies will not recur?

ADDITIONALLY:

- When required action cannot be completed to support finding due dates, a detailed action plan shall be submitted with milestone dates.
- If the finding results in the generation of DRs, DRRs, LDDs, FCRs, procedure revisions, etc., this action along with final disposition must be reported to the Readiness Review Task Force.
- Any subsequent response revisions must be forwarded to the Readiness Beview Task Force.
- Results of committed to actions must be reported to the Readiness Review Task Force upon completion for review and retention in the permanent Readiness Review files.
- Responses should clearly indicate as appropriate what happened, why it happened, any mitigating circumstances or other information that will put the finding in perspective to a third party reader.
- Any conclusions regarding findings should be properly and adequately supported by objective evidence and/or sound logic.

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INSTRUCTIONS FOR COMPLETION OF THE READINESS REVIEW FINDING FORM

ITEM NUMBER:

Enter a sequential number obtained from the Readiness Review Task Force clerk consisting of two RRFs (module

number) - (sequential number).

ORIGINATOR:

Enter the name of the person who

identified the discrepancy.

DATE:

Enter the date the discrepancy was

identified.

RESPONSIBLE ORGANIZATION:

Enter the organization affected by the finding and responsible for resolution

of the discrepancy and/or for supplying resolution (Example: BPC-PFE, Construction, Nuclear

Operating, etc.)

REQUIREMENTS:

Enter the requirement and a reference

to the document and paragraph containing the requirement.

FINDING:

Enter a description of the

noncompliance and how it differs from

the required condition.

RESPONSE DUE DATE:

Enter the scheduled date for

completion of response.

TEAM LEADER APPROVAL/

PROGRAM MANAGER APPROVAL: (self explanatory)

LEVEL:

The team leader shall check the appropriate box indicating severity level of the finding based upon the project's response.

ACCEPTANCE:

The team member and program manager approves the finding response upon acceptance.

NOTE

Finding responses will be provided upon separate documents attached to the finding report by the responding entity. All responses shall clearly indicate the finding number, response date, and contain the signature and title of the person making the response.

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	DATE CA COMPLETE	
	DESCRIPTION OF CARRECTIVE ACTION	
	FINDING	
	DATE RESPONSE	
E UNIT 2 ON PROGRAM KING LOG	DATE SENT	
PLANT VOCILE UNIT 2 READMINESS REVEW PROGRAM ENDING TRACKING LOG	ORGANIZATION	
	DESCRIPTION OF ENUMS	
	DENTELD	
	FPEOPLE REMERS	
	NG34E	

Figure 8.2-3 Readiness Review Program Finding Tracking Log

8.3 RESPONDING TO NRC ITEMS

8.3.1 PURPOSE

During the course of performing their evaluation of the modules and appendices, the Nuclear Regulatory Commission (NRC) may identify questions or issues that will require a response. This procedure outlines the steps to be taken to ensure timely and accurate responses to these items.

8.3.2 SCOPE

The following NRC items are addressed by this procedure:

Category II - Written or verbal questions requiring a written response.

8.3.3 PROCESSING NRC ITEMS

Category I

Category I items are assigned tracking numbers by the NRC and will be entered in the Readiness Review action report for tracking (see Figure 8.3-1). Once the item is identified, Readiness Review will evaluate the item and, with Project help, identify the appropriate organizations to supply the response.

The Project Regulatory Compliance group will assist in this process and will also track the item in accordance with their procedures.

Inspector Follow-up Items (IFI) and Unresolved Items (URI) do not require a written response to be formally submitted to the NRC but do require a written response submitted to Readiness Review for approval prior to submittal to the compliance coordinator for retention.

Revision: O Issue Date: September 28, 1987

Readiness Review Program Manager

NRC violations and deviations require a formal response to the NRC by Project and will be coordinated by the compliance coordinator in accordance with procedure GD-A-41. Prior to submittal, the draft response shall be concurred with by Readiness Review.

Category II

Questions from the NRC are tracked by Readiness Review who has sole responsibility for ensuring timely response to those questions. Questions are tracked in the Readiness Review Action Report.

Questions are of two types, those formally submitted in a letter and verbal questions requiring a formal response. Verbal questions answered verbally are not covered by this procedure.

questions in the scope of this procedure are received, ness Review will identify who should supply the information to the response. A member of the Readiness Review Task Force I then work with these individuals to ensure the question is fully and correctly answered.

Once answers are formulated, Readiness Review will draft the letter to the NRC. The letter will be forwarded to licensing and the appropriate Project organizations for review and comments. Once all comments are resolved the letter will be signed by a project executive and mailed to the NRC.

NOTE

Each person involved in the preparation, review, coordination, and approval of correspondence to the NRC is accountable, within his area of responsibility, for (1) ensuring the overall accuracy of information, (2) ensuring that no misstatements are made in correspondence, including clerical errors, transposition or errors made through simple negligence, (3) ensuring proper concurrence by other organizational entities who are involved in or affected by the subject matter, and (4) ensuring complete and proper implementation of any actions.

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Q

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READINESS RE LEW PROGRAM ACTION TRA HING LOG

RESPON-SIBLE

EDIT ITEM DATE MOD- ORGANI- DATE RR DATE NRC DATE NO. SOURCE NO. LEVEL ITEM SUBJECT ISSUED ULE ZATION DUE STATUS (MP STATUS CLOSED

EXPLANATION OF FIELDS

EDIT NO - The computer record number.

SOURCE - Identification of type and source of action item.

NRC INSP REPORT - Nuclear Regulatory Commission (NRC) inspection report.

NRC LETTER - Letter from the NRC.

NRC REVIEW QUESTION - Question transmitted informally from the NRC during

NRC TELECON - Telephone conversation with the NRC.

The NRC identified item number or a Readiness Review assigned number consisting of the module number and a sequentially assigned number.

LEVEL - Pinding level of significance.

ITEM SUBJECT - Subject of the action item.

DATE ISSUED - Date issued by the source.

MODULE - Readiness Review module.

RESPON ORGIN - The Project organization responsible for the action.

ACTION - Those activities identified to take place to respond or resolve the concern.

<u>DUE DATE</u> - Readiness Review assigned date in-light-of actions required to respond to the NRC.

RR STATUS - Identified as open until Readiness Review is satisfied that the response is acceptable or action is complete; reassigned as closed.

DATE COMP. - Date that Readiness Review status is changed to closed.

NRC STATUS - Identified as open until the NRC identifies the response or action is acceptable. Status is then re-assigned as closed.

CLOSED DATE - Date that NRC status is changed to close.

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8.4 TRAINING

Each employee shall receive indoctrination upon assignment to the Readiness Review program and specific training in the requirements of the program.

8.4.1 INDOCTRINATION

Indoctrination shall consist of, but is not limited to:

- o The objectives of the Readiness Review program.
- o A description of the plant.
- o A description of the site organization and management.
- o The Quality Concern program.
- o The documents and procedures to be used.

8.4.2 SPECIFIC TRAINING

In addition to indoctrination, each employee shall receive specific training in the requirements of the program procedures and revision.

Supervisory personnel shall determine which procedures require presentation and use by subordinates and will give training accordingly. Revisions to procedures shall also be handled in this way.

8.4.3 IMPLEMENTATION

Supervisory personnel will be responsible for the indoctrination of all subordinates and will document the training on the Readiness Review Program Training Indoctrination form, Figure 8.4-1 or the Readiness Review Program Training Report, Figure 8.4-2.

These forms will be maintained in the employee's Readiness Review personnel file maintained by the Readiness Review program staff.

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Réadiness Review Program Manager



READINESS REVIEW PROGRAM TRAINING INDOCTRINATION

SS	NUMBER DATE	
he	following indoctrination subjects were explained to the emplo	yee
		Employees
. !	The objective of the Readiness Review Program	
	A description of the plant	
	description of the site organization and management	
	he Quality Concern Program	
. 1	he documents and procedures to be used	
Ç	Other (Explain)	
	SUPERV	SOR

file maintained by Readiness Review



Vogtle Project

READINESS REVIEW PROGRAM TRAINING REPORT

NOTE The original will be maintained by the supervisor, and a copy will be placed in each employee's personnel file.

8.5 SAFEGUARDS INFORMATION CONTROL

8.5.1 PURPOSE

This procedure establishes the requirements for controlling and distributing Safeguards Information received or originated by the Readiness Review Team during preparation and assessment of Readiness Review Module 23, Plant Security.

8.5.2 SCOPE

This procedure applies to the development, receiving, issuing, storage, and use of documents received or originated by Readiness Review. This procedure applies to all Readiness Review personnel and is not intended to invalidate any of the applicable requirements of procedure number 00650-C of the Project Administrative Procedures Manual.

8.5.3 RESPONSIBILITIES

8.5.3.1 Readiness Review Program Manager

The Readiness Review Program Manager is responsible for overall implementation of this procedure.

8.5.3.2 Readiness Review Team Leader

The Readiness Review Team Leader for Module 23 is responsible for determining which information should be classified as Safeguards.

8.5.3.3 Readiness Review Team Members

The Readiness Review Team members are responsible for complying with this procedure when receiving or originating safeguard documents and during storage and use of safeguards documents.

Revision: O Issue Date: January 20, 1988

Readiness Review Program Manager

8.5.4 GENERAL

8.5.4.1 Information to be Protected

The specific types of information, documents, correspondence, reports, etc. to be protected are those dealing with details of the Plant Security System, including:

- o Plant security and contingency plans.
- o Engineering drawings, vendor documents, sketches or descriptions of intrusion alarms, guard posts, or other security equipment.
- o Portions of guard training and qualification plans, related to response of attacks or threats, or which reveal details of security equipment.
- o Guard orders or procedures, excluding routine duties such as traffic control, material passes, etc.
- o Response and patrol routes.
- o Information related to on-site or off-site response forces.
- o Communication methods or equipment.
- o Correspondence, inspection reports, and audits that reveal Safeguards Information.
- o Information related to specific spent fuel shipments (shipping routes and quantities of spent fuel are not classified).
- o Drawings or documents that explicitly identify certain areas or equipment as being vital for purposes of physical protection.
- o Draft and final copies of the Readiness Review Module 23, including completed checklists and findings.

8.5.4.2 Access to Safeguard Information

- A. Only personnel who appear on the immediate access list will be allowed to sign out and remove Safeguards Information and to receive Readiness Review originated documents.
- B. Personnel that have been fingerprinted may access Safeguards Information on a need to know basis with the approval of the Readiness Review Program Manager or his designee.

8.5.4.3 Protection While in Use and Storage

- A. While in use, Safeguards Information shall be controlled by the person authorized for access. This individual must limit access to the information to those individuals who have a "need to know". Safeguards Information must be attended by an authorized individual, even though the information may not be in constant use.
- B. While unattended, safeguards documents shall be stored in a locked GSA approved security storage container or in a metal storage cabinet provided with a locking bar and a GSA approved combination lock.
- C. A log shall be maintained listing all safeguards documents contained in the storage cabinet (Figure 8.5-1). Each document shall be assigned a sequential control number.
- D. Individual items of correspondence, with or without attachments, may be stored in file folders with a common control number. Individual sequential numbers are not required for each item if the item is identified by a correspondence log number.
- E. Authorized individuals removing documents from the containers shall log the documents in the Safeguard Document Sign Out Log (Figure 8.5-2).

8.5.4.4 Preparation and Marking of Documents

A. Readiness Review shall ascertain that any safeguard documents received by Readiness Review are properly marked in accordance with administrative procedures. Originator shall be notified of any omission for immediate correction.

- B. Safeguard documents originated by Readiness Review shall be conspicuously marked with an approved Safeguards Information stamp (Figure 8.5-3, item a or b). Each page of the document shall be stamped. In addition, the first page of the document shall be identified with an assigned copy number and the name of the assigned individual (Figure 8.5-3, item c).
- C. Readiness Review shall ascertain that the receiving individual has been authorized access to Safeguards Information before issuing the document.
- D. Cover letters or transmittal documents used to transmit safeguards documents shall not contain Safeguards Information and shall be stamped indicating that the cover document is decontrolled when separated from safeguards attachments (Figure 8.5-3, item d).

8.5.4.5 Reproduction and Destruction

- A. Safeguard documents originated by others shall not be reproduced in whole or in part. If additional copies are required, they should be obtained from the originating organization.
- B. Safeguard documents originated by Readiness Review shall be reproduced by authorized personnel to the minimum extent possible consistent with the needs for minimum distribution. All reproductions shall be assigned a copy number per sections 8.5.4.4.B and 8.5.4.6.B.
- C. Safeguard documents no longer needed for the work shall be returned to the issuing department or destroyed by any method that assures complete destruction of the Safeguards Information they contain. Destruction or return shall be documented on remarks column of the Safeguards Document Distribution Log.

8.5.4.6 External Transmittal of Safeguards Documents

A. Safeguards Information will be enclosed in two sealed envelopes or wrappers when being mailed on- or off-site. The inner envelope or wrapper will contain the name and

address of the intended recipient and should be marked on both sides, top and bottom, with the words SAFEGUARDS INFORMATION. The outer envelop or wrapper will show the recipient's name and address but shall not indicate that Safeguards Information is enclosed.

- B. A distribution log, shall be maintained listing all issued documents, copy numbers, and name of recipient of each copy (Figure 8.5-4).
- C. Recipients of Safeguards Information originated by Readiness Review shall be required to sign an acknowledgement certifying the receipt of the safeguards document (Figure 8.5-5).
- D. Safeguards Information shall not be transmitted over unprotected telephone lines except in emergencies. This restriction applies to telephone, telegraph, teletype, facsimile transmission, and radio. Exceptions to this policy may be granted only by the Readiness Review Program Manager.
- E. Safeguards Information may be transported by messenger-courier, United States first class, registered, express, or certified mail, or by an individual authorized access.

8.5.4.7 Use of Automated Data Processing Systems (WANG, PC, etc.)

- A. Word processing equipment may be used for preparation of safeguard documents. Documents generated shall be transferred to tapes, disketts, etc., and stored as specified in Section 8.5.4.3 and shall be deleted from the word processing program at the end of each day.
- B. Personnel responsible for performing word processing or text editing of generated documents shall be cleared for "NEED TO KNOW" according to Section 8.5.4.2.B.

8.5.4.8 Removed from Safeguards Information Category

A. Documents originally containing Safeguards Information shall be removed from the Safeguards Information category when the

information no longer meets the criteria specified in section 8.5.4.1.

B. Only the Readiness Review Program Manager and the Module 23 Team Leader are authorized to reclassify Safeguards Information. READINESS REVIEW
SAFEGUARDS DOCUMENTS STORAGE LOG

ITEM NUMBER	SUBJECT	DATE RECEIVED	DATE RETURNED	REMARKS
			975	
		W. Carlotte		
		AND SERVICE AND ASSESSMENT OF THE PROPERTY OF		

Readiness Review Safeguards Documents Storage Fod

19 88

0

PLANT VOGTLE UNIT 2
READINESS REVIEW PROGRAM
PROCEDURES

PAGE

8.5-7

READINESS REVIEW SAFEGUARDS DOCUMENTS SIGN OUT LOG

TEM NUMBER	USERS NAME	DATE	TIME OUT	TIME IN
		1		
		v viti e s		
	44 (1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.			
	a seed to be used			
9 (1)				

PAGE ____

Figure 8.5-2
Readiness Review Safeguards Documents Sign Out Log

SAFEGUARDS INFORMATION

UNAUTHORIZED DISCLOSURE OF THIS INFORMATION IS SUBJECT TO CIVIL AND CRIMINAL PENALTIES DO NOT DUPLICATE.

Item a.

SAFEGUARDS INFORMATION

Item b.

SAFEGUAROS INFORMATION

READINESS REVIEW SUBMITTAL
COPY NUMBER: ______
ISSUED TO:

Item c.

SAFEGUARDS INFORMATION DECONTROLLED WHEN SEPARATED FROM ATTACHMENT

Item d.

Figure 8.5-3 Sample Safeguards Stamps

READINESS REVIEW SAFEGUARDS DOCUMENTS DISTRIBUTION LOG

COPY	ISSUED TO:	DATE	ACKNOWLEDGE RECEIPT(DATE)	REMARKS

			0.0000000000000000000000000000000000000	
	No. and Control			
		-		

PAGE ____

Figure 8.5-4
Readiness Review Safeguards Documents Distribution Log

	SAFEGUARUS	INFORMATION	
	DOCUMENT	TRANSMITTAL	
No.	Description	Copy No. Issued To: I	Date
	AND		
documents. I ce safeguarded in a Control*.	rtify that all documer ccordance with Procedu	ietary Safeguards Information ts in my possession shall be re 00650-C, *Safeguards Information rn this transmittal within 5 days.	
documents. I ce safeguarded in a Control*. On-site recipien	rtify that all documer ccordance with Procedu ts shall sign and retu	ts in my possession shall be re 00650-C, *Safeguards Information	
documents. I ce safeguarded in a Control*. On-site recipien	rtify that all documer ccordance with Procedu ts shall sign and retu nts shall sign and ret	ts in my possession shall be re 00650-C, *Safeguards Information rn this transmittal within 5 days.	
documents. I ce safeguarded in a Control*. On-site recipien Off-site recipie	rtify that all documer ccordance with Procedu ts shall sign and retu nts shall sign and ret	ts in my possession shall be re 00650-C, *Safeguards Information rn this transmittal within 5 days.	
documents. I ce safeguarded in a Control*. On-site recipien Off-site recipie DATE OF RECEIPT:	rtify that all document coordance with Proceduts shall sign and returns shall sh	ts in my possession shall be re 00650-C, *Safeguards Information on this transmittal within 5 days. urn this transmittal within 15 days.	
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Figure 8.5-5
Readiness Review Safeguards Information Document Transmittal

THE VOGTLE PROJECT

UNIT 2

READINESS REVIEW PROGRAM

PROCEDURES MANUAL

MANUAL NUMBER: 35

ISSUED TO: M. V. Sinkule

ORGANIZATION: US, NRC - Region II

DATE: September 28, 1987

FOREWORD

The Vogtle Project Readiness Review Program Procedures Manual establishes procedures, methods, and instructions to be followed by all Readiness Review Program personnel in the performance of their duties. Also, interfaces with the Nuclear Regulatory Commission are described in this manual.

Controlled copies of this manual are distributed to Readiness Review Program team leaders and to those people designated by Readiness Review Program management. It is the responsibility of those people in supervisory positions to ensure that subordinates are trained in and are familiar with procedures contained herein.

Manual holders are expected to become familiar with the manual and to use it in their work. New or revised procedures are effective upon distribution and shall be implemented immediately.

R. W. McManus

Readiness Review Program Manager

1

Date: 10 NOV 87

UNIT 2 READINESS REVIEW PROGRAM PROCEDURES MANUAL DISTRIBUTION

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7.	Reserved	NA
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8.3	0	08-06-87
8.4	0	08-05-87
8.5	0	01-19-88

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1. PROGRAM DESCRIPTION

1.1 INTRODUCTION

The purpose of the Unit 2 Readiness Review Program is to provide a systematic and disciplined review of Georgia Power Company's (GPCs) implementation of design, construction, and initial test program processes to increase the assurance that quality program activities for Plant Vogtle have been accomplished in accordance with licensing commitments.

1.2 OBJECTIVE

The Unit 2 Readiness Review Program is a GPC self-initiated management system developed in follow-up of the Unit 1 Readiness Review Program and results to accomplish the following objectives:

- o Identify changes in the Unit 2 programs and work processes from those described and assessed in the Unit 1 Readiness Review modules.
- o Provide an in-depth self-assessment of the appropriate Unit 2 work processes and conduct separate management overview of the self-assessment process and its conclusions.
- o Further assure the early identification of any problems or concerns and ensure their correction in a timely manner.
- o Identify and follow-up on findings and corrective actions resulting from the Unit 1 Readiness Review process to preclude repetition of past problems during Unit 2.
- o Provide a mechanism for the early resolution of any differences between the Nuclear Regulatory Commission (NRC) and GPC interpretation of Unit 2 regulatory requirements and the acceptance criteria.
- o Provide a system that will facilitate the NRC's review, inspection, appropriate action, and approval of the acceptability of Plant Vogtle Unit 2 work processes on an advanced Readiness Review basis.

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o Provide a planning system, including GPC prepared and NRC accepted milestone schedules, for the orderly conduct of the separate actions of GPC and NRC.

1.3 SCOPE

The Plant Vogtle Unit 2 Readiness Review Program is an addition to the Unit 1 activities and translates the products of the Unit 1 program into useful management tools. Assessment of Vogtle Unit 2 activities, in general, address the following:

- o The listing of design and construction licensing commitments and implementing documents identified in the Unit 1 Readiness Review Program will be maintained and updated through the completion of Unit 2. Commitments unique to Unit 2, if any, will be identified and added to the listing. Nuclear Operations has responsibility for maintenance of Unit 1 operations licensing commitments apart from Readiness Review.
- O Unit 2 activities to be assessed include design, construction, and Initial Test Program Preoperational Test Phase.
- Assessments include programmatic and technical attributes for evaluation. During Unit 1 Readiness Review, assessment of design technical attributes was covered in-depth in the Independent Design Review. Due to the commonality of design bases, criteria, and specifications, and the advanced stage of design work at the time of the Unit 1 Readiness Review, a separate Unit 2 Independent Design Review will not be conducted. Rather, any applicable attributes or follow-up on Unit 1 findings are covered by the specific Unit 2 modules.
- o The results of Unit 1 Readiness Review module assessments, along with applicable NRC inspections, and other sources such as Inspection and Enforcement bulletins, Quality Assurance audits, etc., are evaluated to assist the direction of the Unit 2 program. The results of these evaluations are used to determine those Unit 1 module areas that require a Unit 2 assessment.

2. ORGANIZATION AND RESPONSIBILITIES

2.1 PURPOSE

This procedure describes the Unit 2 Readiness Review Program organization and responsibilities of the Readiness Review Program Task Force and others with specific activities within Readiness Review Program scope. Qualifications of the Readiness Review Task Force personnel are also included in this procedure.

2.2 ORGANIZATION

The Unit 2 Readiness Review Program organization is comprised of the Readiness Review Board, the Readiness Review Task Force, Project Engineering, Project Construction, Project Start-up, Nuclear Operations, and Quality Assurance (QA).

2.2.1 READINESS REVIEW BOARD

The Readiness Review Board consists of the following members:

- o Southern Company Services (SCS) Vice President Nuclear. (Chairman, Readiness Review Board).
- o GPC Vogtle Project Engineering Manager.
- o GPC Vice President Vogtle Construction.
- o SCS Executive Consultant Licensing.
- o GPC General Manager, Vogtle Project Support.
- o GPC General Manager, Corporate Quality Assurance.
- Stone and Webster Engineering Corporation Vice President and Senior Engineering Manager.
- o Readiness Review Program Manager (Secretary and non-voting member).

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2.2.2 READINESS REVIEW TASK FORCE

The Readiness Review Task Force is comprised of the Readiness Review program manager, technical team members, and support personnel. The Readiness Review Task Force reports to the GPC general manager, Vogtle Project Support.

Additionally, a module consultant, to provide off-project expertise, may be utilized, as needed, at the discretion of the Readiness Review program manager or the Readiness Review Board.

2.3 RESPONSIBILITIES

2.3.1 READINESS REVIEW BOARD

- o Meet as directed by the Chairman, Readiness Review Board but no less frequently than quarterly.
- o Review the adequacy of Readiness Review Program implementation and the results of audits and assessments.
- o Identify Board members who will serve as module sponsors to monitor module development activities as described in procedure 6.
- o Provide final approval of module results and conclusions.

2.3.2 READINESS REVIEW TASK FORCE

The Readiness Review Task Force, through the program manager, is responsible for:

- o Management of overall scope, direction, and schedule of this assessment program.
- o Maintenance of design/construction/preoperational test phase licensing commitments until Unit 2 Fuel Load.
- Identification and consolidation of findings and corrective actions as a result of Unit 1 Readiness Review.
- o Preparation of Unit 2 assessment plans.
- o Review of QA's implementation of the Unit 2 assessment plans and evaluation of the assessment results.

- o Consolidation of Readiness Review Program assessments into Unit 2 Readiness Review modules.
- o Providing program status for Senior Project Management and the Project Management Board.
- o Establishment of the necessary management, control, and training for program implementation.
- o Promulgation of Readiness Review Board review results to the appropriate organization.
- o Preparation of agenda and minutes of the Readiness Review Board meetings.
- o Interaction with the Nuclear Regulatory Commission.

2.3.3 QUALITY ASSURANCE

Project QA is responsible for:

- o Implementation of the assessment plans generated by the Unit 2 Readiness Review Task Force, using QA personnel supplemented by personnel with technical expertise in the area under evaluation.
- o Continuation of their system of audits as described in the Project QA program.

Additionally, corporate QA will audit conformance to these procedures by all program entities.

2.3.4 PROJECT ENGINEERING, PROJECT CONSTRUCTION, PROJECT START-UP, AND NUCLEAR OPERATIONS

These organizations shall:

- O Ensure that licensing commitments in their area of responsibility are properly implemented and included in implementing documents.
- o Provide evidence to the Readiness Review Task Force that new or revised commitments have been implemented.
- o Ensure that findings resulting from Unit 1 Readiness Review have resulted in Unit 2 program and work activity changes where appropriate and as committed.

- o Provide evidence to the Readiness Review Task Force that the Unit 1 Readiness Review findings have been evaluated for impact and, if appropriate, implemented in Unit 2.
- o Provide Readiness Review with details of changes in project organization or programs from that described in the Unit 1 modules.
- o Provide responses to findings resulting from Unit 2 assessments.

2.4 QUALIFICATIONS

The following qualifications are minimum requirements for the positions indicated. Team members not meeting all requirements as indicated may be acceptable provided the Readiness Review program manager provides written justification as to the acceptability of the individual. Resumes of all Readiness Review Task Force personnel shall be maintained in Readiness Review Program files.

2.4.1 READINESS REVIEW PROGRAM MANAGER

- o Bachelor of Science in engineering or engineering technology, or be a Professional Engineer.
- o Minimum ten years experience in design or construction.
- o Minimum five years nuclear design/construction management experience.

2.4.2 READINESS REVIEW TEAM MEMBER

- o Minimum Associate of Science in engineering or engineering technology or Bachelor of Science in physical science.
- o Supervisory experience in the specific nuclear design, construction, or startup discipline.
- o Minimum five years nuclear design or construction experience.

3. READINESS REVIEW PROCESS

3.1 CONDUCT OF REVIEW

3.1.1 PURPOSE

This procedure outlines the elements of the Unit 2 Readiness Review Program.

3.1.2 GENERAL

The Unit 2 Readiness Review process consists of four activities that are discussed below:

o Commitment Identification and Implementation

During the Unit 1 Readiness Review Program the Task Force performed a systematic review of licensing documents and identified the Project commitments for design, construction, and operations. The list of commitments with the corresponding list of documents that implement the commitments were segregated by module and received NRC review and concurrence. The Unit 2 effort performs a review of the same documents for any Unit 2 specific commitments and also reviews FSAR amendments and any addictional letters to the NRC and updates and maintains current for Unit 2 the listing of licensing commit ants and their implementing documents. In this regard, design, construction, and preoperational test phase commitments are maintained by Readiness Review while operations commitments are maintained by Nuclear Operations.

To ensure completeness, Readiness Review supplies these lists of licensing commitments and implementing documents to the appropriate project organization who is responsible for providing feedback to Readiness Review as to the method and documentation of implementation.

Readiness Review as a part of the assessment will sample commitments within each applicable module scope and ascertain by examination of Project implementation (i.e., calculations, drawings, and construction

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processes, etc., for conformance) whether such information on implementation is correct.

o Unit 1 Finding Follow-up

A list of findings and corrective actions as a result of the Unit 1 Readiness Review Program has been established for use by the Project to assist in avoiding a repeat of past problems. The list contains the findings identified by Readiness Review and the NRC, coded by module, applicable program activities, and cause of deficiency.

The Project will use this document to ensure that Unit 2 programs and processes preclude recurrence of the problem. The Project will provide feedback to Readiness Review as to Unit 2 actions taken. Readiness Review will include an assessment of this process as a part of the Unit 2 modules.

As a special case of follow-up, the readiness of the Unit 2 security system is incorporated into the Unit 2 Readiness Review with particular emphasis on the review of programmatic changes to ensure the correction of security problems identified in Unit 1.

o Unit 2 Assessments

In the Unit 1 Readiness Review Program modules, Readiness Review assessed the adequacy of design, construction, and readiness for operation of Unit 1. Unit 2 assessment activities evaluate Unit 2 design, construction, and preoperational test phase to ensure that compliance to licensing commitments has been maintained. Additionally, an assessment of the planning and implementation of Unit 2 plant security is performed.

In developing the Unit 2 assessment plans, the following features are considered:

- Implementation of corrective action of applicable Unit 1 Readiness Review findings into Unit 2 activities.
- NRC findings and comments from Unit 1 Readiness Review applicable to Unit 2.
- Results of Units 1 and 2 Quality Assurance audits and NRC inspections subsequent to Unit 1 Readiness Review.
- Industry issues.

The plan includes guidelines on the extent of evaluation to be conducted and assessment details. The completed and management-approved plan is implemented by Readiness Review in accordance with the details of the plan.

Assessment activities for Unit 2 are developed based on the Unit 1 Readiness Review and NRC findings, the status of completion of Unit 2 activities during Unit 1 Readiness Review, and whether there have been significant changes in organization or program details for Unit 2 from that evaluated in Unit 1.

o Unit 2 Modules and Appendices

After completion of Unit 2 assessment activities, Readiness Review will publish a Unit 2 module.

Typically, a module includes:

- An updated commitment and implementation matrix.
- A program description that includes identification of significant changes from the Unit 1 program.
- A list of audits and NRC inspections conducted subsequent to the Unit 1 modules.
- A list of the Unit 1 Readiness Review Program findings and actions taken in Unit 2.
- Results of Unit 2 assessment.

3.2 COMMITMENT IDENTIFICATION AND IMPLEMENTATION

3.2.1 PURPOSE

This procedure provides direction for the identification of licensing commitments, establishment and control of a commitment data base, assignment of commitments to modules/appendixes, and identification of implementing documents.

3.2.2 SCOPE

This procedure applies to preparation of commitment and implementation matrixes for Unit 2. As in the Unit 1 Readiness Review program, commitments relative to Westinghouse activities as the Nuclear Steam Supply System (NSSS) supplier are omitted. Operations commitments are maintained by Nuclear Operations in response to Nuclear Operations procedures.

3.2.3 RESPONSIBILITIES

Readiness Review Task Force

Readiness Review is responsible for the control and maintenance of design and construction commitments and the identification of those commitments to the responsible Project organization for determining implementation. Additionally, the task force is responsible for follow-up of commitment implementation (procedure 3.5) and inclusion of the commitment and implementation matrixes into the modules (procedure 5).

Project (Design, Construction, and Startup Organizations)

The Project is responsible for verification of commitment implementation of licensing commitments and supplying Readiness Review with the results of their review.

3.2.4 COMMITMENT DEFINITION

A commitment is an obligation, as described in the Vogtle Electric Generating Plant (VEGI) Final Safety Analysis Report (FSAR) or correspondence with the Nuclear Regulatory Commission (NRC), to comply with an industry standard, Regulatory Guide

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(RG), Branch Technical Position (BTP), or owner-plan of specific action. For the purpose of Readiness Review, source documents for licensing commitment identification will be the VEGP FSAR and correspondence to the NRC including, specifically, correspondence pertaining to Inspection and Enforcement (I&E) bulletins and generic letters. Correspondence pertaining to NRC Inspection Reports and/or findings or reportable deficiencies [10 CFR 50.55(e)] is tracked by other Project programs. A file copy of each commitment source, described above, is maintained and will be kept current by posting amendments to the FSAR and filing of correspondence between Georgia Power Company and the NRC. Within these source documents, design, construction, and preoperational test phase commitments for safety-related activities will be identified. Examples of commitments, to the extent described in the VEGP FSAR, are:

- o American Concrete Institute (ACI) 318-71.
- o BTP-CMEB 9.5-1.
- American Society of Mechanical Engineers (ASME) III, Division 1, NCA-2000.
- o American National Standards Institute (ANSI) N45.2-2.
- o United States Nuclear Regulatory Commission RG 1.55.
- Cited Technical Reports utilized as design basis or methodology.
- o Specific design and/or construction considerations.
- o Specific standards of acceptance.
- o Specific cited technical data used as a design basis and/or unique design methodology.

Descriptions, detailed data and/or parameters resulting from design activities, general codes, and regulations are not generally considered licensing commitments for this program. These include:

- o Dimensions.
- o System operational concepts or operational descriptions.
- o References to general bodies such as 10 CFR 50, ASME, ACI (specific requirements from such bodies, however, are commitments).

- o Design calculation details (e.g., strength parameters, flow rates).
- o Listings of information (tables, figures, etc.) which are presented for reader reference purposes or are summaries of specific commitments identified elsewhere.

3.2.5 COMMITMENT IDENTIFICATION

Commitments are identified through a detailed review of the FSAR and the other source documents. A controlled copy of the FSAR is maintained and updated for the use by the task force.

The logic diagram (Figure 3.2-1) shall be used as a guide in properly identifying licensing commitments. These guidelines were developed to support the definition of a commitment and to aid in maintaining consistency in the identification process.

An item from a source document qualifies as a commitment when it is a stated obligation to a standard, code, or specific licensing basis or is categorized into one of the indicated areas defining owner-plans of specific action. Once identified, each commitment will be assigned to the appropriate module(s). Items considered questionable as commitments, after following the logic diagrams or guidelines, shall be resolved by the Readiness Review program manager. The above process was performed in Unit 1 Readiness Review and a data base was compiled current to the FSAR amendment effective for each module.

3.2.6 PREPARATION OF COMMITMENT MATRIX

The Readiness Review Task Force utilizes the data base compiled for Unit 1 as a base from which a Unit 2 data base is developed. New commitments, or revisions to existing commitments, identified from FSAR amendments or other source documents are entered on a commitment edit sheet (Figure 3.2-2). The edit sheets are routed to the applicable team members for review. After review, the new/revised commitments are entered into the commitment data base. These additions and revisions are incorporated into the data base and a Unit 2 commitment matrix is published for use by the task force and the Project.

Readiness Review utilizes a personal computer to store commitments that have been identified. Commitments are stored in a data base. The structure of the data base is identified in Figure 3.2-3.

3.2.7 COMMITMENT IMPLEMENTATION

During the Unit 1 program, Readiness Review identified project documents implementing each licensing commitment. Commitments and implementing documents were tabulated in an implementation matrix and published in the Unit 1 module reports. Each module implementation matrix was current as to the module date and FSAR amendment identified in the report.

After publication of the Unit I modules, Readiness Review re-baselined the module implementation matrixes to a common date and FSAR amendment. The commitments for each module, current to the common date, were compared to the commitments published in the Unit I module report. Implementing documents were identified for each changed or new commitment and were entered into the implementation matrix data base.

Readiness Review then maintained the commitment and implementation matrixes, updating both for changed or new commitments upon issue of an FSAR amendment.

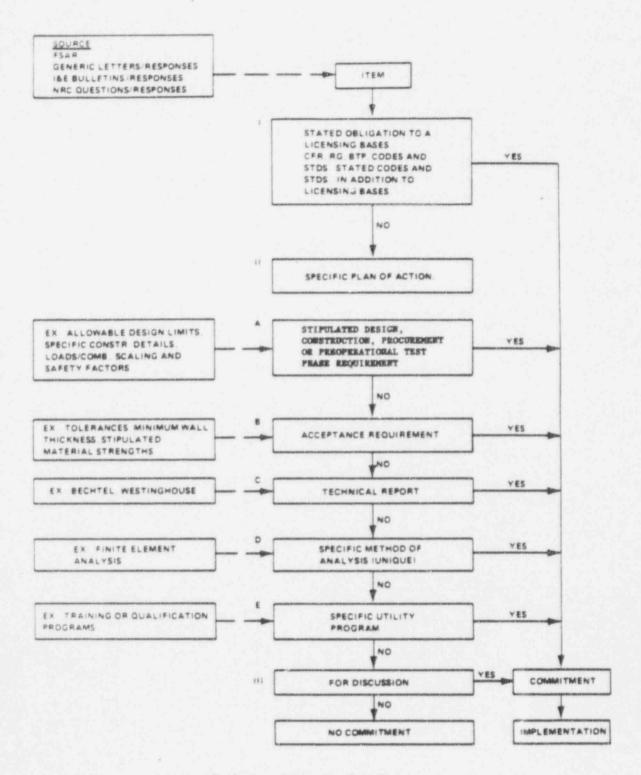
For the Unit 2 Readiness Review Program, Readiness Review continues to update commitments, but the Project has assumed responsibility for updating implementation data. The implementation matrix, tabulating current commitment data and the implementation data as maintained to the conclusion of the Unit 1 Readiness Review Program, is forwarded to the Project. Upon receipt, the Project will verify that the information contained for commitment implementation is correct by comparison of that information to current controlling documents. Where implementing documents have been revised, the Project will verify that the current revision continues to implement the commit e. or take action to implement the commitment and identity corrective actions for work or processes that may be in noncompliance to the commitments. For newly identified commitments, the Project will identify controlling documents that implement the commitments.

Updated commitment implementation information will be returned to Readiness Review by the Readiness Review established response date. The preferred method of response is identification of changes in red on a copy of the list. Upon receipt of the updated implementation information, the data base will be updated.

3.2.8 REVISED OR ADDED COMMITMENTS

Subsequent to receipt of the updated commitment implementation information from the Project, any commitments that change (due

to later amendments, letters, etc.) will be re-submitted to the Project for additional implementation updating.



3.2-1 (Sheet 1 of 2) Commitment Identification

GUIDELINES FOR COMMITMENT IMPLEMENTATION

- o Source materials received and reviewed.
- o Is a statement made to comply or conform to a specific standard, regulatory guide, branch technical position, etc. (must be specific, not a motherhood or general statement: i.e., 10 CFR 50, ACI, or ASME)?
- o If it is not a stated obligation to licensing basis, is the statement a stipulated design or construction requirement, acceptance requirement, a specific and/or unique method of analysis, a specific utility training or qualification program, or a reference to a technical report used as design basis? (See examples on logic chart).
- o If the response to any of the above is yes, the statement is a commitment. If still uncertain, discuss with respective team leaders.

Items not generally considered commitments:

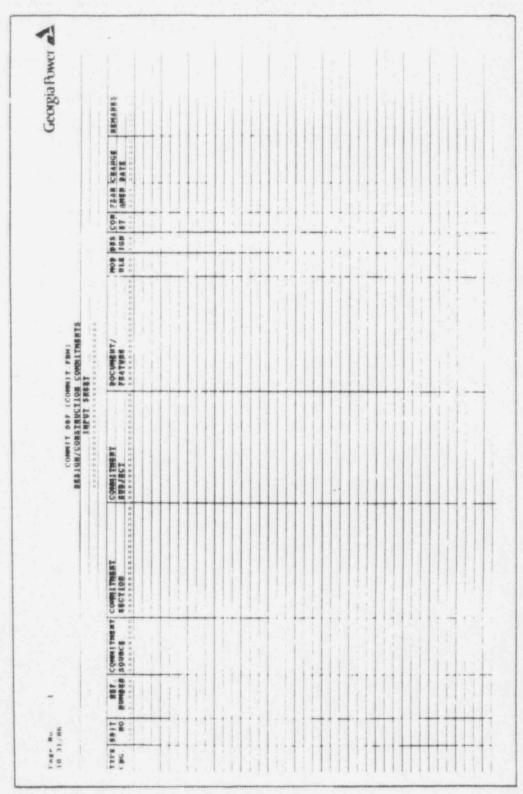
- o General codes/standards.
- o Dimensions.
- o System descriptions.
- o System operation descriptions.
- o Design calculation parameters.
- o Flow rates, etc.

Key works used in identifying commitments include:

- o will. (a)
- o shall. (a)
- o Conform to.

3.2-1 (Sheet 2 of 2) Commitment Identification

a. Not applicable to dimensions, descriptions, or system operational (functional) descriptions.



3.2-2 Commitment Edit Sheet

FIELD	FIELD NAME	TYPE	WIDTH
1	EDITNO	Numeric	8
2	NUMBER	Numeric	8
3	SOURCE	Character	20
4	SECTION	Character	25
5	SUBJECT	Character	200
6	COMMITMENT	Character	200
7	MODULE	Character	34
8	DES	Character	1
9	CONST	Character	1
10	REMARKS	Character	200
11	AMENDMENT	Numeric	2
12	REBASECHG	Character	1
13	CHANGEDATE	Date	8
14	IMPLEMENTN	Character	254

0100P/218-7

3.3 UNIT 1 FINDING FOLLOW-UP

3.3.1 PURPOSE AND SCOPE

This procedure provides direction for developing the list of Unit 1 findings identified during the Unit 1 Readiness Review by either Readiness Review or the Nuclear Regulatory Commission (NRC). The list is used by the Project to ensure findings applicable to Unit 2 are factored into programs and practices to preclude recurrence.

3.3.2 SCOPE

This procedure applies to the process of establishing a list of findings from Unit 1 Readiness Review and the Unit 2 assessment of the applicability of those findings and implementation of corrective actions.

3.3.3 RESPONSIBILITIES

Readiness Review Task Force (Readiness Review)

Prepare a list of Unit 1 Readiness Review findings and NRC deficiencies from Unit 1 Readiness Review.

Project

Determine the applicability of Unit 1 findings to Unit 2 and, where applicable, verify that the Unit 2 programs and practices incorporate the corrective action identified for the Unit 1 findings. Provide justification to support a determination that a finding is not applicable to Unit 2 and provide feedback to Readiness Review as to Unit 2 actions taken.

3.3.4 IDENTIFICATION AND LISTING OF FINDINGS

The Readiness Review Task Force identifies the valid findings (both the NRC and Readiness Review) from the Unit 1 design, construction, initial test program modules, appendices, and Independent Design Review (IDR). Once identified, each finding is entered into a computerized data base (named Trends) to

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include the applicable module, finding level, finding description, and corrective action.

Once all the findings are entered into the data base, a matrix sorted by module and finding number is printed and provided to the Project.

3.3.5 PROJECT ACTION

The list of findings provided by Readiness Review is an abbreviation of the total stated finding and corrective action. To fully understand the finding and corrective action, the response as published in the Unit 1 module should be reviewed.

Each finding will be evaluated and categorized for applicability to Unit 2 as follows:

1. Isolated instance/one time corrective action

For Unit 1 findings where the Unit 1 investigative action determined the finding isolated with correction of the specific deficiency and without other corrective action (procedure revision, etc). No additional action required.

2. Corrective action remains identical and acceptable

For Unit 1 findings that required revision to procedures or practices with Unit 1 corrective action remaining in effect as published in the Unit 1 module.

Findings in this category shall include a description of investigative actions taken to verify correctness of this statement and should be supported by identification of the Unit 2 sample selection or procedure excerpts. Additionally, the investigative action must verify that the Unit 1 corrective action has been in effect during or applicable to all Unit 2 work.

3. Corrective action has changed

This category includes cases where the corrective action may have been eliminated or enhanced as a result of program evolution.

Finding corrective actions in this category require description of the deletion or changes with justification.

4. Corrective action not entirely effective

Unit 2 follow-up of the findings may identify that corrective action was not adequate. If this occurs, the response must identify the problem and describe what actions are being taken to determine the extent, tract and correct the deficiencies, and additional corrective action to prevent recurrence.

Response to each finding shall be returned to Readiness Review by the date specified by Readiness Review in the letter transmitting the findings matrix to the Project.

3.3.6 READINESS REVIEW ACTION

After receiving the Project response for each finding, Readiness Review will evaluate each response and determine whether the information supplied is adequate to support the categorization of each finding. Additionally, findings classified as "corrective action has changed" or "corrective action not entirely effective" will be evaluated for acceptability of the revised corrective action.

Upon acceptance of the Project response, the Readiness Review team member shall enter the Unit 2 finding category (as described in Section 3.3.5 above) in the matrix under the heading "Description of Unit 2 Follow-up Action". Findings for Category 3, corrective action has changed and 4, corrective action not entirely effective shall also contain a brief description of the condition in an attachment to the table. The remarks column shall be used to identify the location of this information.

Unit 1 finding follow-up is used as a source of information in the Unit 2 assessment as described in procedure 3.5.

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3.4 MODULE SCOPES

3.4.1 PURPOSE

The purpose of this procedure is to present the scope of each module and appendix, the relationships between them, and how each is addressed in the Unit 2 Readiness Review Program.

3.4.2 SCOPE

This procedure applies to those modules and appendixes that discuss construction, design, or preoperational test phase activities.

3.4.3 RESPONSIBILITIES

The Readiness Review Board approves the module scopes.

The Readiness Review program manager provides overall administration of the Readiness Review team activities.

The Readiness Review teams perform the initial module scoping and ensure that subsequent module activities adhere to the defined scope.

3.4.4 PROGRAM SCOPE

As discussed in procedure sections 1. and 3.1, the Unit 2 Readiness Review Program extends the Unit 1 pilot program into Unit 2. The Unit 2 program uses the Unit 1 pilot program results as a base and concentrates on identifying and examining changes to the programs and organizations assessed in Unit 1 and examining design, installation, and preoperational test phase activities performed since the Unit 1 pilot program for that module concluded. Programs that have been added are also included in the Unit 2 program, as well as some programs that were not examined by Readiness Review in Unit 1, but which experienced some difficulty during unit completion or preoperational testing (plant security, as an example). The module and appendix scopes presented in Section 3.4.5 of this procedure include the total scope of the Unit 2 design, construction, and preoperational test phase testing programs.

Revision; O Issue Date: September 28, 1987

Readiness Review Program Manager

The scope of the Unit 2 Readiness Review Program is summarized on Table 3.4-1. The Unit 2 design and procurement activities, civil/structural and backfill activities, tendon installation, and diesel generator activities were essentially complete at the time of the Unit 1 review and were conducted under the programs examined in Unit 1. Re-assessment of these activities is not necessary and the Unit 2 Readiness Review Program related to these activities is limited in nature. Activities performed by Nuclear Operations subsequent to Unit 2 fuel load will be conducted under the controls of the plant procedures now utilized for operation of Unit 1 and are not included in the Unit 2 Readiness Review Program.

3.4.5 SCOPE STATEMENTS

Appendix 1 of this procedure provides a description of the scope of each module and the relationships between other modules. Readiness Review procedure section 3.1 describes the four major activities that comprise the Unit 2 program, commitment identification and implementation, Unit 1 finding follow-up, Unit 2 assessments, and Unit 2 modules and appendixes. The scope description sheets in Appendix 1 list the extent to which each of these four activities will be performed for each module and appendix.

PLANT VOGTLE UNIT 2 READINESS REVIEW PROGRAM PROCEDURES

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PAGE 3

UNIT 2 READIMESS REVIEW ACTIVITY SUMMARY

MOSULE	DATE	I ASSESE	MENT 2%	SIGNIFICANT: FIRBLINGS	PROGRAM :	COMMITMENT	U 1 FINDING		UNIT 2 MODULE
Appendices									
Appendix C Procurement	05 85	75*	45*	yes	no	yes	y**	no	no
Appendix D Socument Control	95 85	75*	45*	ye.	no	yes	yes	no	no
Appendix E Material Control	95 85	75*	45#	60	80	yes	yes	no	20
Appendix F Inspector Qualifics	li-85	90*	54*	yes	no	yes	yes	1,10	yes
Appendix G Messuring and Test	05-85 Equipment	75*	45*	yes	20	yes	yes	no	no
Appendix 1 f.mlity Assurance 0	04 85 rgenisetic	75 e	45*	no	no	yes	yes	no	BO
Append'x J Equipment Qualifics	10-85 tion	90*	54*	no	80	yes	yes	no	80

samed on plant complete at time of assessment

NOTE 1 : PART 1 - Implementation varification and corrective action followup

PART II - In process activities

PART III - Completion, termover, and preoperational testing activities

NOTE 2 : Attachment 1 to this table explains the rationale of module selection

. 4-5

EVALUATION OF UNIT 1 ASSESSMENT RESULTS

Civil

An evaluation of the Unit 1 Civil modules listed below has shown that these modules developed for Unit 1 provided an adequate description and evaluation of the programs used for the Unit 2 work. This conclusion is based in part on the advanced state of design and construction completion of Unit 2 during the Unit 1 assessment.

Module 1 Reinforced Concrete Structures
Module 8 Structural Steel

Module 13A Foundation Materials and Backfill

Module 13C Post Tensioned Containment

For each of the above modules, the Unit 1 Readiness Review findings (RRFs) will be evaluated by the Project for applicability in Unit 2 and, if appropriate, corrective action steps verified implemented in Unit 2 programs and practices.

Mechanical

An evaluation of the Unit 1 Mechanical Module 16, Nuclear Steam Supply System, has shown that the module developed for Unit 1 provided an adequate description and evaluation of the programs used for the Unit 2 work. Specific findings as a result of Unit 1 Module 16 will be evaluated by the Project for applicability in Unit 2 and, as appropriate, implemented in the Unit 2 programs and processes.

Module 13B, Fire Protection, was an evaluation of the planning and implementation activities of the fire protection task force. The Unit 1 module concluded that the program was adequately planned and implemented in Unit 1. A similar programmatic approach will be used in Unit 2, thereby making a separate Unit 2 assessment by Readiness Review unnecessary.

Module 18C, Diesel Generator, verified that licensing commitments were met and modifications to the Transamerica DeLaval diesels were completed. The Unit 2 diesels are being modified in a similar manner as Unit 1 by the same organization which performed the work in Unit 1. Since the Unit 1 Readiness Review concluded the commitments were being met and the same process is being used in Unit 2, a separate Unit 2 assessment is not necessary.

Electrical

Unit 2 modules will be developed in the same module areas as Unit 1. For ease of presentation, modules 17 and 19 will be comitined into a single module.

Operations

The Unit 1 Operations modules listed below consisted of an evaluation of the programs established for operation of the plant. These programs are being used in the operation of Unit 1 and will be adopted for operation of Unit 2 at fuel load. Since both units are operated using essentially the same organization and procedures and since the on-going evaluation and modification of operational programs is carried out under a rigorous program of operations, controls, and oversight, a separate Readiness Review is not necessary in the following areas:

Module	2	Operations Training and Qualification
Module	3	Operations Organization and Administration
Module	7	Plant Operations and Support
Module	9 A	Radiological Protection
Module	9B	Chemistry

Findings identified during the design assessment of Module 9A, Radiological Protection, will be evaluated by the Project for applicability in Unit 2 and, if appropriate, corrective action steps will be verified implemented in Unit 2 program and practices.

Appendixes

The evaluation of the Unit 1 appendixes listed below has shown that the Unit 1 Readiness Review provided an adequate description and evaluation of the programs used for the Unit 2 work.

Appendix	C	Procurement	
Appendix	D	Document Control	
Appendix	E	Material Control	
Appendix	G	Measuring and Test 1	Equipment
Appendix	I	Quality Assurance	
Appendix	J	Equipment Oualificat	tion

The Unit 1 RRFs for each of the above appendixes will be evaluated by the Project for applicability in Unit 2 and, if appropriate, corrective action steps will be verified implemented in Unit 2 programs and practices. Findings in appendixes C, D, and G had potential for affecting the overall acceptability of other quality programs and will receive follow-up in Unit 2 by Readiness Review.

Records

Unit 2 Readiness Review activities, within the scope of modules not planned for a full assessment and module report, are documented in records maintained in the Readiness Review files. Those records are generally the same as the back-up records maintained for modules with full assessments and reports, and include:

- O Project input for commitment implementation and "Unit 2 Action" to Unit 1 RRFs.
- o Updated implementation data base.
- o Updated Unit 1 RRF data base (Trends).
- Updated data base (findings) of findings, audits, and deficiency reports.
- o Executed checklists, PRFs and responses.
- o Records of Readiness Review investigations, including for example, the above evaluation of Unit 1 Assessment results.

The results of Readiness Review activities, within the scope of modules not planned for a module report, are reported to the Readiness Review Board.

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MODULE 1, REINFORCED CONCRETE STRUCTURES

Scope

Module 1 addresses the design, procurement, and construction of Category 1 reinforced concrete structures. Also included in the scope of this module is the turbine building as it may potentially affect Category 1 structures. Structures designated Category 2 and determined to not have a potential impact on Category 1 structures are not included in the scope of Readiness Review.

The evaluation of reinforced concrete structures includes design, procurement, and construction activities as they relate to concrete, reinforcing steel, and cadwelding within these structures. The post-tensioning system employed in the containment shell is covered in Module 13C.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activity is limited to a part 1 assessment (commitment implementation re-verification and corrective action follow-up).

Module Issue:

MODULE 3A, INITIAL TEST PROGRAM

Scope

Module 3A addresses the preoperational test phase of the Unit 2 Initial Test Program (ITP). Figure 3.4 illustrates how ITP activities are separated between the preoperational test phase and the startup test phase. For Unit 2, the startup test activities will be conducted using the controls and procedures developed for Unit 1 and will not be included in the Unit 2 Readiness Review program.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment. Construction Acceptance Testing is examined during the assessments performed for Modules 4, 6, 18A, and 20.

Module Preparation and Issue:

MODULE 4, MECHANICAL EQUIPMENT AND PIPING

Scope

Module 4 addresses the design, procurement, and construction work activities regarding safety-related mechanical equipment and piping systems classified as American Society of Mechanical Engineers (ASME) Section III, Classes 1, 2, and 3. Design and construction work activities typically associated with the mechanical discipline are addressed in several modules as indicated in Table 3.4-2.

Unit 2 Readiness Review

Commitment Implementation:
The module commitment listing is maintained current. The Project identifies the current method of implementation.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 6, ELECTRICAL EQUIPMENT

Scope

The scope of this module includes those design, procurement, installation, and inspection activities associated with safety-related (Class IE) electrical equipment for Vogtle Electric Generating Plant (VEGP), Unit 2. The following categories of electrical equipment are included in this module:

- o Transformers.
- o Bus systems (including penetration assemblies).
- o Switchgear.
- o dc systems.
- o Motor control centers.
- o Boards and panels.
- o Distribution equipment.
- o Inverters.

Electrical motors are addressed in Modules 4, 16, 18A, and 20; wall-mounted electrical items other than transformers are addressed in Module 17; electrical instrumentation is addressed in Modules 18A and 20; attachment of equipment to supports is covered by this module; embed channels are covered in Module 8; concrete pads are covered in Module 1; and supports for bus systems are covered in Module 19.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

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Module Preparation and Issue:

MODULE 8, STRUCTURAL STEEL

Scope

Module 8 addresses design and construction work activities as they relate to structural steel utilized in Category 1 (seismic) structures. The structural steel within the scope of this module consist of embeds, structural steel framing for containment internals and other Category I structures, anchorage for structures and equipment, pipe whip restraints, cranes and supports, liner plate systems and miscellaneous Category I structural items. Also included in this module is discussion and verification of the welding program at the VEGP site, (i.e., procurement, control and issue of weld filler metals, welder qualifications, and weld procedure preparation). Welding processes applicable to structural steel are also addressed in this module.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 9A, RADIATION PROTECTION (SHIELDING)

Scope

Module 9A addresses the elements of the Health Physics department's radiation protection program and a discussion of radiation shielding design. For Unit 2, only the radiation shielding design is addressed.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 11, PIPE STRESS AND SUPPORTS

Scope

Module 11 addresses the design and construction work activities regarding pipe stress analysis and pipe supports for the Unit 2 safety-related mechanical systems classified as ASME Section III, Classes 1, 2, and 3, and non-safety-related systems supported to Seismic Category I requirements for protection of safety-related components.

Mechanical piping and equipment is addressed in Module 4, instrumentation is addressed in Module 20, and the piping and supports for the nuclear steam supply systems primary loop is addressed in Module 16.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 12, CABLES AND TERMINATIONS

Scope

The scope of this module includes those design, procurement, installation, and inspection activities associated with all Class 1E cables and terminations for VEGP, Unit 2.

This module covers cables up to the equipment termination block. Equipment internal wiring is addressed in Module 6.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 13A, FOUNDATION MATERIALS AND BACKFILL

Scope

The scope of this module includes those design and construction activities associated with foundation material (marl, lower sand stratum, etc.) design analyses, selection, and placement of Category I backfill.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 13B, COATINGS

Scope

Module 13B addresses the design and construction activities associated with protective coatings for the VEGP Unit 2. Coatings discussed in this module are those applied to the Unit 2 diesel generator fuel oil storage tank and those used within the Unit 2 containment.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 13C, POST-TENSIONED CONTAINMENT

Scope

The scope of this module includes the design and construction activities associated with the post-tensioning system employed in the containment shell.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 16, NUCLEAR STEAM SUPPLY SYSTEM

Scope

Module 16 addresses the design interface between Bechtel Power Corporation (BPC) and Westinghouse and the construction activities involved with the installation of primary loop equipment. Work activities considered Westinghouse generic are not addressed; however, this module addresses those Westinghouse activities considered Vogtle specific.

Other Westinghouse hardware supplied as part of the nuclear steam supply system package is addressed in the modules that contain similar hardware.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 17/19, ELECTRICAL RACEWAYS AND SUPPORTS

Scope

Module 17 addresses the design, procurement, installation, and inspection of conduit, cable trays, and special raceways containing safety-related cables for Class IE cables for VEGP Unit 2.

Module 19 addresses the design and construction activities associated with the supports and associated lateral bracing for electrical cable trays, conduit, pullboxes, and junction boxes for VEGP Unit 2 facilities. Also included in this module are electrical equipment supports. Electrical equipment directly mounted to building steel or floor embeds is addressed in Module 6.

For Unit 2, Modules 17 and 19 will be presented as a combined module entitled 17/19, Electrical Raceways and Supports.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 18A, HEATING, VENTILATION, AND AIR CONDITIONING

Scope

Module 18A addresses the design and construction activities associated with the safety-related and Seismic Category I heating, ventilation, and air conditioning (HVAC) systems for the VEGP Unit 2.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 18B, FIRE PROTECTION

Scope

This module identifies those Final Safety Analysis Report (FSAR) commitments for the Project Fire Protection Program for VEGP Unit 2.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 18C, DIESEL GENERATOR

Scope

Module 18C addresses the diesel generator and associated support systems, such as the air-start, lubricating oil, and fuel oil systems. The diesel generators quality assessment program, undertaken by the Project to address specific industry concerns regarding diesel generators, is also included.

Various other design and construction work activities associated with the diesel generators are addressed in other modules. Testing requirements are included within the scope of Module 3A, Initial Test Program, the electrical systems connecting to the diesel generator and the sequencer, are in the scope of Module 6, and the structure is in the scope of Module 1.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

MODULE 20, INSTRUMENTATION AND CONTROLS

Scope

Module 20 addresses the design activities of BPC and the construction activities of Georgia Power Company (GPC), Cleveland Consolidated, and Pullman Power Products (PPP) for instrumentation and control (I&C). This module includes Pneumatic instruments but excludes electrical I&C panels (Module 6) and HVAC instrumentation (Module 18A). For Unit 2, the scope of the Module 20 includes installation of NSSS instrumentation.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

MODULE 23, SECURITY

Scope

This module addresses the hardware, programs, and organizations that comprise the Unit 2 Physical Security Plan.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

The assessment is a full assessment.

Module Preparation and Issue:

APPENDIX 21C, PROCUREMENT

Scope

This appendix lists the commitments and their implementing documents for the programs for the procurement of equipment, material, and services for VEGP Unit 2.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

APPENDIX 21D, DOCUMENT CONTROL

Scope

This appendix lists the commitments and implementing documents for the document control and Quality Assurance (QA) records control program for VEGP during the design, construction, and pre-operational testing phases of the Project.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

APPENDIX 21E, MATERIAL CONTROL

Scope

The scope of Appendix 21E, Material Control, addresses permanent plant materials, parts, and equipment at VEGP from receipt through issue to contractors for installation. It also addresses equipment maintenance program activities from receipt through transfer to GPC Nuclear Operations.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

A Unit 2 module is not issued. The matrixes from the first two activities above and the assessment results are presented to Project Management and retained by Readiness Review.

> Appendix 1 (Page 22 of 26)

APPENDIX 21F, INSPECTOR QUALIFICATION AND CERTIFICATION

Scope

This appendix describes and assesses the construction organizations and their procedures which ensure that commitments for the qualification and certification of quality control inspectors are met. The requirements for inspector qualification and certification during the initial test program are described in Module 3A.

The individual modules describe and assess specific inspection activities and also address whether inspectors held the correct certifications during specific inspection activities.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment.

The assessment is a full assessment.

Module Preparation and Issue:

A Unit 2 modules is prepared and submitted presenting the results of the above three activities.

APPENDIX 21G, MEASURING AND TEST EQUIPMENT

Scope

This appendix provides a description and evaluation of the programs governing the control of measuring and test equipment (M&TE) utilized during construction activities of the VEGP. It is intended to describe the method of compliance with the Project commitments found in the FSAR. This appendix addresses the commitments and their implementation and determines whether appropriate procedures were in use and adhered to.

Included are descriptions of M&TE programs for GPC, PPP, and Nuclear Installation Services Company. Other onsite contractors made use of GPC's calibrated equipment when required for determining inspection acceptance of construction activities. Controls governing the M&TE program for procured equipment are part of the quality program required by the procurement specification. The procurement of equipment and services is discussed in Appendix 21C.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

A Unit 2 module is not issued. The matrixes from the first two activities above and the assessment results are presented to Project Management and retained by Readiness Review.

APPENDIX 211, QUALITY ASSURANCE ORGANIZATION

Scope

The scope of this appendix encompasses the specific QA organizations involved in the Vogtle Project and the activities which are carried out by these organizations. As such, a major topic of this appendix is QA audits. The other QA program elements, such as inspection testing, procurement, etc. are covered in other modules on a functional basis or in other appendixes.

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

A Unit 2 module is not issued. The matrixes from the first two activities above and the assessment results are presented to Project Management and retained by Readiness Review.

APPENDIX 21J, EQUIPMENT QUALIFICATION

Scope

This appendix encompasses the procedures, methods, and controls governing the VEGP equipment qualification (EQ) program. This program covers safety-related equipment and project-specified post-accident monitoring equipment; however, the term "safety-related equipment" will be used throughout this appendix to mean "safety-related equipment and project-specified post-accident monitoring equipment".

Unit 2 Readiness Review

Commitment Implementation:

The module commitment listing is maintained current. The Project identifies the current implementing documents for module commitments.

Unit 1 Finding Follow-up:

The Project provides evidence of continuing conformance to corrective actions or justification for changes.

Assessment:

Assessment activities are limited to commitment implementation re-verification and follow-up of corrective actions.

Module Preparation and Issue:

A Unit 2 module is not issued. The matrixes from the first two activities above and the assessment results are presented to Project Management and retained by Readiness Review.

3.5 UNIT 2 ASSESSMENT

3.5.1 PURPOSE

This procedure provides direction for the preparation and implementation of assessment plans for the Unit 2 Readiness Review program.

3.5.2 SCOPE

This procedure applies to the preparation and execution of assessment plans and evaluation of the collected data.

3.5.3 GENERAL

The scope of Unit 2 Readiness Review modules and appendixes is described in Section 3.4 of this manual and the type of assessments to be performed is described in Table 3.4-1.

3.5.3.1 Background Information

In development of the assessment plans, the Readiness Review Team will, as a minimum, review the sources listed below to determine the appropriate subjects for assessment:

- o Module commitment and implementation matrixes and their source documents (see Section 3.2 of this procedure).
 - Vogtle Electric Generating Plant (VEGP) Final Safety Analysis Report (FSAR).
 - Correspondence between VEGP and the Nuclear Regulatory Commission (NRC) containing commitments.
- o Findings and corrective actions from Unit 1 Readiness Review Program (see Section 3.3 of this procedure).
 - Trends matrix and the listed source documents.
 - Project programs and documents associated with the listings.

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- o Audit data bases (see Section 5 of this procedure).
 - Quality Assurance (QA) audit reports.
 - NRC inspection reports.
 - Special investigations.
- o Licensing Evaluation Reports.
- o Reports of industry problems.
- o Project Unit 1 lessons learned.
- o Quality Concerns.

In addition to review of the above sources, a review of the following will be performed for identification of specific issues for inclusion in the Unit 2 assessments:

Industry Problems

Same engineer or NSSS supplier as Vogtle. Recurring industry problems. Generic NRC concerns.

Quality Concerns

Va''d violation of the Vogtle Project Quality program.

QA Audit Finding Reports

All Level I findings. Recurring finding topics.

NRC Violations

All that were against any Specification, Design Criteria, or FSAR requirements.

Unit 1 Readiness Review Findings

All Level I findings.
All collective significance findings.

NOTE:

For all of the above sources, any hardware issues that required rework or repairs.

3.5.3.2 Plan Content

The plan provides guidelines on the extent of evaluation to be conducted, assessment details, and selection and qualification of personnel implementing the plan.

Assessment activities for Unit 2 will be developed based on the Unit 1 Readings Review and NRC findings, the status of completion of Unit 2 activities during Unit 1 Readiness Review, NRC violations and industry problems since the Unit 1 module assessment, and whether there have been significant changes in organization or program details for Unit 2 from that evaluated in Unit 1.

Assessment plans will be developed in three standard subdivisions identified as parts.

- o Part 1, Commitment Implementation and Corrective Actions.
- o Part 2, Design and Construction Programs and Activities.
- O Part 3, Design and Construction Completion, and Initial Test Program.

3.5.3.3 Plan Preparation, Approval, and Implementation

Assessments plans and checklists are prepared by the Readiness Review Team, reviewed and approved by the Readiness Review program manager and Readiness Review Board. The plans are implemented by Project QA in accordance with the details of the plan. Readiness Review will participate directly with QA and provide assistance as appropriate.

3.5.4 PERSONNEL

3.5.4.1 Responsibilities

Personnel responsibilities are defined in Section 2 of the Unit 2 Readiness Review Procedures with additional responsibilities, if any, as described herein.

3.5.4.2 Qualifications

o The qualifications of Readiness Review personnel are presented in Readiness Review Procedure 2.

- o The qualifications of Project QA personnel are presented in QA department procedure QA-05-01.
- o Technical specialists assigned to support QA assessment activities shall be qualified in accordance with procedure QA-05-01. The qualifications shall be subject to review by the Readiness Review program manager.

3.5.4.3 Assessment Plan Development

The assessment plans shall be developed in response to the objectives and guideline presented below.

3.5.4.4 Part 1 of Assessment Plans

The objective of Part 1 assessments and directions for implementing the plans are described below.

3.5.4.4.1 Objective

There are two primary objectives of Part 1 of each assessment plan:

- o Identification of Unit 2-specific commitments; identification of additions or revisions to Project licensing commitments as a result of FSAR amendments or Post-Unit 1 Readiness Review project letters to the NRC and verification of appropriate implementation of those commitments.
- A review of findings as a result of the Unit 1 Readiness Review activities, examination of corrective actions taken by the Project in response to the Unit 1 Readiness Review Program, and the incorporation of those corrective actions into Unit 2 programs and procedures to preclude recurrence.

3.5.4.4.2 Sample Selection

Unit 2 Readiness Review assessments will address, to the extent possible, a selected safety-related system and safety-related services (electrical, controls, HVAC) to that system. A single system is assessed to facilitate evaluation of discipline interfaces. The system selected should exhibit a broad range of attributes in all disciplines. Interfaces with that system, or other systems, may be assessed if necessary to perform an acceptable assessment.

Utilizing appropriate sources as listed in Section 3.5.3.1, specific commitments are selected for review and verification of implementation in response to the following criteria:

- o Representative of Project activities on Unit 2.
- o Inclusion of all Unit 1 Readiness Review findings classified as Level I (having potential safety concerns) and all NRC violations that were:
 - within the scope of the module.
 - related to the Unit 1 Readiness Review Program.

and which addressed the licensing commitments or required corrective actions to demonstrate acceptable implementing actions.

- o Representative of commitments which were revised or added subsequent to publication of the Unit 1 module.
- o Include selected commitments identified to Module 21A in the commitment matrix.
- Include a sample of Project-provided implementation to new or changed commitments.

3.5.4.4.3 Sample Size

Sample size is not fixed, but must, as a minimum, include all Level I Readiness Review findings and NRC violations that resulted from their review of the Unit 1 modules as described in Section 3.5.4.4.2 above. In addition, utilizing the implementation matrix as updated by the Project, the sample shall include a sufficient number of commitments to demonstrate confidence in the accuracy of the matrix and adequate to represent identified or potential concerns.

3.5.4.4.4 Implementation Details

The commitments selected for verification shall be examined for the following characteristics:

o The commitment, as stated, reflects the intent of the source document.

o Implementation, as described in the implementation matrix, is usually sufficient to demonstrate compliance with the commitment and review may be limited to documenting Project implementation of the commitment in documents such as Design Criteria, Piping and Instrument diagrams, one-line diagrams, construction specifications, construction procedures, start-up procedures, etc. If deemed necessary by the Readiness Review Team to develop additional assurance, additional documents such as calculations, installation drawings, isometrics, installation records, desktop instructions, etc., may also be reviewed and implementation documented in those documents.

3.5.4.5 Part 2, Programs and Activities

3.5.4.5.1 Objective

The primary objective of Part 2 of the assessment plans is assess on-going Project programs and activities to determine whether Unit 2 design, construction, and preoperational test phase activities continue to conform to program requirements. Other objectives to be addressed in Part 2 include:

- o Review of continued acceptability of response to design and construction related problems identified during the Unit 1 Readiness Review.
- o Review and evaluation of the acceptability and implementation of significant changes in programs, procedures, or responsibilities for Unit 2 activities, if any.
- O Assessment of the technical adequacy of selected design documents such as calculations and demonstration of necessary interface activity.
- o Assessment of ongoing construction activities to demonstrate appropriate response to design details and construction-related procedures, personnel qualification status, material control, etc.

3.5.4.5.2 Sample Size

Sample size (number of documents, number of welds, tag-numbered items, etc.) shall be established by the Readiness Review Team in consideration of the following criteria:

- o The sample shall reflect the status of construction completion of Unit 2 activities at the time of the Unit 1 assessment.
- o The sample shall reflect extent (isolated versus generic) of the deficiencies identified during the Unit 1 Readiness Review assessments.
- o The sample shall reflect the frequency of QA audit findings and NRC violations, unresolved items, and inspector follow-up items for audits and inspections performed subsequent to publication of the Unit 1 Readiness Review modules.
- o The sample shall reflect the need to examine and demonstrate confidence in Project response to new or revised programs.

The Readiness Review Team is to consider the need for the imposition of an increased sample size should early results of assessments indicate problem areas.

3.5.4.5.3 Implementation Details

The plan prepared by the Readiness Review Team shall identify specific characteristics to be assessed to meet the objectives described in Section 3.5.4.4.1, above. These characteristics shall be identified on checklists described below in Section 3.5.6.

In addition to the checklists, guidelines and directions shall be provided to the QA assessor in the event specific documents, equipment, piping isometrics selected for examination are incomplete, inaccessible, or unavailable for other reasons (see Section 3.5.5, below).

3.5.4.6 Part 3, Design and Construction Completion

Part 3 of the assessment plan addresses design completion activities, acceptability of installed hardware, acceptability and retrievability of completed quality records developed during design and construction activities, and the Preoperational Test Phase program.

3.5.4.6.1 Objective

There are three distinct objectives to Part 3 of the assessment plan as listed below:

- Evaluation of the design completion activities such as the finalization programs (design verification), change control packages, interface activities, and design change control.
- o Evaluation of as-installed product acceptability and the availability and retrievability of quality records.
- Evaluation of the Preoperational Test Phase.
 (Construction Acceptance Tests and Preoperational Tests).

3.5.4.6.2 Sample Selection

Unit 2 Readiness Review assessments will address programs and activities appropriate to the systems described in Section 3.5.4.4.2.

Utilizing the sources described in Section 3.5.3.1, the Readiness Review Team will select general categories of documents for review and specific portions of systems being installed for evaluations. Alternatively, the team may select specific tag number items and prepare checklists (or assessment guides if checklists are inappropriate) for use by Readiness Review and QA personnel performing assessments. The sample to be assessed shall be selected in response to the following criteria:

- o Representative of Project activities on Unit 2.
- o Inclusion of all Unit 1 Readiness Review findings classified as Level I (having potential safety significance) and all NRC violations that were,
 - within the scope of the module.
 - related to the Unit 1 Readiness Review Program.
- o Inclusion of significant QA audit results (Audit Finding Reports [AFRs], Corrective Action Reports [CARs]) from audit reports not considered in the Unit 1 assessments.
- o Inclusion, as appropriate, of NRC identified deficiencies (violations, unresolved items, inspector follow-up items) from inspections subsequent to Unit 1 module publication.

- Consideration of Georgia Power Company (GPC)-generated reports of potential deficiencies (construction deficiency reports).
- o Consideration of deficiencies determined to be reportable.
- o Consideration of NRC bulletins and notices.
- Consideration of significant industry problems identified subsequent to Unit 1 module assessment.
- Inclusion of significant changes in Project programs, organizational responsibilities, and Unit 2-specific design aspects.
- Consideration of deficiencies identified in the Quality Concerns program.

Programs and activities found acceptable during the Unit 1 Readiness Review assessments need not be re-assessed unless reviews conducted in response to the selection criteria described above results in a potential concern.

3.5.4.6.3 Sample Size

Sample size (number of documents, number of welds, tag-numbered items, etc.) shall be established by the Readiness Review Team in consideration of the following criteria:

- o The sample shall reflect the status of construction completion of Unit 2 activities at the time of the Unit 1 assessment.
- o The sample shall reflect extent (isolated versus generic) of the deficiencies identified during the Unit 1 Readiness Review assessments.
- o The sample shall consider the frequency and significance of similar QA audit findings and NRC violations, unresolved items, and inspector follow-up items for audits and inspections performed subsequent to publication of the Unit 1 Readiness Review modules.
- o The sample shall reflect the need to examine and demonstrate confidence in Project response to new or revised programs.

The Readiness Review Team is to consider the need for the imposition of an increased sample size should early results of assessments indicates problem areas.

3.5.4.6.4 Implementation Details

The plan prepared by the Readiness Review Team shall identify specific characteristics to be assessed to meet the objectives described in Section 3.5.4.4.1, above. These characteristics shall be identified on checklists described below in Section 3.5.6.

In addition to the checklists, guidelines and directions shall be provided to the QA assessor in the event specific documents, equipment, piping isometrics selected for examination are incomplete, inaccessible, or unavailable for other reasons (see Section 3.5.5, below).

3.5.5 ASSESSMENT SAMPLE DELETION OR SUBSTITUTION

The specific samples to be assessed are selected by Readiness Review after consideration of availability, completion status, access, etc. Based on the Unit 1 assessments, substitutions or deletions of specific checklist items will occur due to un-anticipated conditions. To minimize the frequency of such occurrences, the following recommendations shall be considered.

o Identify alternate samples or a generic class of samples (e.g., specify 2 calculations, 10 welds from these 3 isometrics, 1 of these 2 heat exchangers, review certified material test reports for 3 heats of weld filler metal, etc.).

In the event alternate samples are not identified, the assessor shall notify the responsible Readiness Review team leader if the prescribed sample cannot be assessed. The team leader shall identify an alternate sample, or with the concurrence of the Readiness Review program manager authorize deletion of the assessment, delay the assessment, or transfer the assessment activity to another module.

3.5.6 CHECKLISTS

The Readiness Review Team prepares checklists as a means of assuring consideration of specific attributes or characteristics to be evaluated during assessment activities.

3.5.6.1 Format

Checklists are prepared by Readiness Review on the form shown in Figure 3.5-1. For each checklist, the following items shall be entered by Readiness Review:

- o Checklist originator and date.
- o Sample identification.
 - Short description and information to be recorded by auditor for tracking item/documents examined.
- o For each checklist element or grouping of characteristics, the originator shall record the following information on the checklist:
 - Checklist item number for each entry.
 - Reference to source of specific requirement of characteristic to be examined (e.g., Project Reference Manual, Part C, 4.3.1.A, Pullman Power Products Procedure IX-18, paragraph 4.3.2, etc.). Characteristics or requirements which are assessed to evaluate the response to Readiness Review Unit 1 findings or NRC violations shall show a reference to the finding/violation.
 - The specific characteristics to be examined.
 Directions concerning the sample and sample size to be assessed may also be added if appropriate.

3.5.6.2 Checklist Preparation

The assessment plan checklists shall identify the selected characteristics and/or attributes to be evaluated for the sample items. Examples of characteristics or attributes that may be appropriate include:

- o Objective evidence of commitment implementation in calculations, specifications, drawings, and procedures.
- Objective evidence of appropriate review and/or approval functions (including discipline chief's reviews) as applicable for calculations, drawings, specifications, design criteria, change documents, and Deviation Reports (DRs).

- Objective evidence that change documents [Design Change Notices (DCNs), Field Change Requests (FCRs), Supplier Deviation Disposition Requests (SDDRs), DRs, etc.] do not infringe upon licensing commitments unless covered by an approved Licensing Document Deviation (LDD).
- o Objective evidence that calculation results are correctly reflected in drawings, specifications, etc.
- Objective evidence that, where required, inputs to calculations are correct and/or that calculation output, where required, is correctly factored into other approved calculations or designs.
- o Objective evidence that results and assumptions of calculations are consistent with the design criteria and licensing commitments.
- Objective evidence of inter-discipline design coordination, when appropriate, for drawings, specifications, and design change documents.
- o Objective evidence of design coordination between the Project and off-Project design groups.
- o Objective evidence that design change documents including DRs, FCRs, and SDDRs, as appropriate, are incorporated into design drawings and specifications.
- o Evidence that requirements for maintenance, storage, installation, and testing have been adequately addressed by appropriate procedures, instructions, and inspection reports.
- O Evidence of acceptable calibration status of tools or other items of measuring and test equipment (M&TE) used at the time of the activity.
- o Objective evidence that records are traceable to the activity and are complete, accurate, and signed off as required.
- Objective evidence that prerequisite requirements were performed.
- Evidence that Quality Control (QC) personnel are appropriately certified.
- O Evidence that exceptions noted on selected records have been identified on DRs as appropriate.

- o Evidence that DRs have been properly dispositioned, justification statements are included for required dispositions, and that each closed report is signed by QC.
- o Evidence that any required test records are available, complete, accurate, retrievable, and acceptable per applicable requirements.
- o Evidence that key installation attributes such as location, orientation, mounting, welding, connections, configuration, separation, and identification are in accordance with design/vendor requirements.

3.5.6.3 Completion of Checklist

Checklists are used as a guide during assessment activities. The characteristic or attribute (requirement) to be assessed is reviewed within the context to the identified reference and the list of questions and/or directions.

3.5.6.3.1 Assessment Results

A record of the documents or hardware reviewed must be maintained (either on the checklist or on an attachment referencing the item number) to establish the basis for the entry in the "accept" or "reject" columns. In addition to identifying the specific sample, the "finding/comment" column is to be used for description of the actual conditions found and the reasoning for establishing the accept/reject status.

If the condition found is unacceptable, the "reject" column is checked and the AFR, CAR, or Readiness Review Finding (RRF) number is recorded in the "resolution" column.

3.5.6.3.2 Inapplicable Requirements

Certain characteristics or attributes specified in the checklist may not be applicable to the specific sample being evaluated. If this occurs, the assessor will enter "N/A" (not applicable) in the "finding/comment" column with a short statement of explanation. Readiness Review concurrence is required prior to closure of the checklist.

3.5.6.3.3 Unverified Requirements

In the event the assessor is unable to perform the required examination or review (no access, no work in progress, etc.), the assessor will enter "N/V" (not verified) in the "finding/comment" column with an explanatory statement. Readiness Review concurrence is required prior to closure of the checklist.

3.5.6.3.4 Checklist Closure

The signature of the assessor in the "performed by" box indicates the assessor has completed his assessment, has reviewed the accuracy of the entries, and has included appropriate backup documentation and records in the checklist package.

The checklist package is reviewed by the Readiness Review team leader and the signature in that box attests to acceptability of the package and conclusions.

3.5.7 EVALUATION OF ASSESSMENT RESULTS

The Readiness Review Task Force will review the checklists and backup data for the purpose of:

- Assuring completeness and acceptability of responses to checklist requirements.
- Identifying and verifying accuracy of reported deficiencies.

3.5.7.1 Review of Response to Findings

The Readiness Review Task Force will evaluate responses to deficiencies reported on RRFs, GPC QA AFRs, or Bechtel QA CARs in response to Section 8.2 of this procedure.

The review shall address the subjects described in the "General Guidelines for Responding to Readiness Review Findings" as printed on the back side of the RRF form for all RRFs, AFRs, and CARs. Additionally, the response shall be evaluated for the following:

- o Does it adequately address the identified deficiency?
- o Is it complete?

- o Is the action plan (if necessary) adequate to preclude future recurrence of the deficient conditions and is the schedule for corrective actions acceptable?
- o Does the deficiency indicate that corrective actions as a result of the Unit 1 Fradiness Review Program are inadequate or have not been extended to Unit 2?

Findings shall also be evaluated for collective significance when considered with findings from other modules, QA audits, and NRC inspections.

3.5.7.2 Assessment of Significance

The team, after reviewing the finding response and upon consultation with the program manager, shall classify findings into levels of importance based on potential impact to plant safety. The following levels are used:

- Violation of licensing commitments, project procedures, or engineering requirements with indication of safety concern.
- II. Violation of licensing commitments or engineering requirements with no safety concerns.
- III. Violation of project procedures with no safety concerns.
- IV. Non-finding based on additional information/clarification supplied by the Project.

The level shall be indicated at the bottom of the finding form by adding the word "level" and the appropriate roman numeral, or by checking the appropriate box in the verification block as provided by the current revision to the RRF (Figure 8.2-1) form.

3.5.7.3 Assessment Plan Closeout

The Readiness Review Team shall include the assessment plan, checklists, and backup documentation in the Readiness Review module files. Prior to filing, the documents shall be checked to verify that all deficient items have been addressed and that necessary information and documents are included to support the checklist entries.

RE PA	RED BY	IEW CHECKL	AUDIT NO.	NO. RR-			
			DATE AUDIT NO.			PAGE OF	
SAMPLE IDENTIFICATION				AUDIT DATE		AREA	
				AUDITORS			
EM	REFERENCE	REQUIREMENT		FINDING / COMMENT	ACCEPT	REJECT	RESOLUTION
NAME AND ADDRESS OF THE PERSON							No.
-							
-			No. of Contrast, Asset				
-							
-	C Total Assistance						
NAME AND ADDRESS OF							
-							
SHEET SHEET SHEET						Jan 4	
SHADE AND					-		
ON SHIP SECOND							The second secon
Sales Street							
-							
NACTOR ASSESSMENT							Male
ERFORMED BY DATE			E	R R TEAM LEADER		DATE	

Readiness Review Program
Checklist

4. READINESS REVIEW TASK FORCE - QUALITY ASSURANCE INTERFACE

4.1 PURPOSE

This procedure describes the interface between the Readiness Review Task Force and Quality Assurance (QA) elements of the Readiness Review program organization.

4.2 SCOPE

This procedure applies to the Readiness Review Task Force and the QA Department during implementation of the Unit 2 Réadiness Review Assessment Process.

4.3 RESPONSIBILITIES

Readiness Review Task Force

- o Define module scope.
- Prepare an assessment plan including checklists and detailed instructions.
- o Prepare a milestone schedule for the module.
- o Obtain Readiness Review Board approval of the module scope and plan.
- o Present findings and responses to Readiness Review Board.
- o Provide support to QA as required for implementation of the assessment plan.
- o Prepare draft Unit 2 module and obtain comments.

Quality Assurance

- o Perform detailed planning to incorporate the assessment plan into a QA audit and the approved tentative audit schedule.
- o Assign personnel, perform the audit and verify the checklist items in accordance with applicable QA procedures.

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- o Provide day-to-day direction for any technical personnel assigned to the audit.
- o Issue, track, and close findings.
- o Review, provide input, and concur with Unit 2 module assessment conclusions.
- o Provide a statement as to the adequacy of the work activities presented by the module.

4.4 INTERFACE ACTIVITIES

- o The Readiness Review Task Force will forward the draft assessment plan for each module supplement to the Vogtle QA manager for comment before submission of the plan to the Readiness Review Board for approval.
- o Upon approval by the Readiness Review Board, the assessment plan will be forwarded to the Vogtle QA manager for implementation.
- o QA will schedule initial meetings or initiate communications to advise Readiness Review of planning progress, the audit schedule and requirements for technical support and to resolve any problems with incorporating the assessment plan into a QA audit.
- o QA shall provide the Readiness Review Task Force the opportunity to comment on findings and closures prior to issuance or acceptance.
- o Findings issued by QA as a result of Readiness Review assessment activities shall be clearly identified as such.
- o In the event that the audit results in concerns by either QA or Readiness Review that are not shared, or considered out-of-scope, the concerned entity shall issue, track, and close their own findings following their applicable procedures.
- O Upon completion of the audit QA will forward copies of the executed checklists to the Readiness Review Task Force.
- o QA will provide the Readiness Review Task Force the opportunity to comment on any report of the audit prior to issuance.

o The Readiness Review Task Force will provide QA with the draft Unit 2 module for review.

QA will concur with the assessment conclusions, and provide a statement as to the adequacy of the work activities presented by the module.

5. PREPARATION OF UNIT 2 MODULES

5.1 PURPOSE

This procedure provides guidelines for the contents and general format of modules and appendixes.

5.2 SCOPE

This procedure applies to module/appendix documents prepared by the Readiness Review Task Force.

5.3 RESPONSIBILITIES

The Readiness Review program manager is responsible for the overall implementation of the Readiness Review program.

The Readiness Review team leaders are responsible for ensuring that the modules/appendixes conform to the requirements of this procedure.

5.4 MODULE CONTENT

The following are general guidelines for the format and contents of modules/appendixes. Adjustments will be made in cases which warrant change.

Preface

This section will describe the scope and methodology of the Readiness Review program.

Executive Summary

This section will contain the assessments of the Readiness Review Team and Board for the specific module.

Introduction (1.)

This section will present the scope and boundaries for discussion within the specific module, identify in general the completion status of project work covered, and planned completion schedule.

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Organization (2.)

This section will present organization charts and identify the current project group(s) responsible for the work covered by the module.

Commitments (3.)

This section will present a matrix of the project licensing commitments for the work covered by the module as found in the Vogtle Electric Generating Plant Final Safety Analysis Report (FSAR), responses to generic letters, and other documents.

The commitment matrix will identify, by notation in the left margin, any changes in commitments from that identified in the Unit 1 modules. This section will also contain an implementation matrix which identifies the method of implementation for each commitment. The FSAR amendment used in establishment of the commitment matrix and the date commitment implementation verification was completed will be stated in Section 3.

Program Description (4.)

This section will identify the Vogtle Project work activities and programs utilized to control work within the scope of the module. Additionally, this section will identify the controlling project design criteria, specifications, and procedures that control work activities. Significant program changes since Unit 1 will be identified in this section.

Audits, Nuclear Regulatory Commission (NRC) Inspections, Special Investigations and Unit 1 Finding Follow-up (5.)

This section will identify in matrix form, the Quality Assurance (QA) audits and findings issued and the NRC inspections performed and findings issued on work activities or programs as they apply to a particular module. Also included will be a description of any special investigations (or reportable deficiencies) within the scope of the module and a list of Readiness Review and NRC findings as a result of Unit 1 Readiness Review, indicating their applicability to Unit 2 and, if applicable, corrective actions taken to work processes or programs. Section 5.0 will be arranged as follows:

- o 5.1 Quality Assurance Audits;
- o 5.2 NRC Inspections;

- o 5.3 Special Investigations;
- o 5.4 Unit 1 Readiness Review and NRC Readiness Review findings (RRPs).

Program Assessment (6.)

This section will describe the assessment activities conducted to verify proper implementation of commitments and conformance to project procedures and requirements, including the assessment plan development, implementation, and results.

The section will include discussions, in subsection 6.3, of Readiness Review or Project activities which bear on the assessment, but were conducted outside or in preparation of, the formal module assessment plan. The discussion should show how these accivities affected the module assessment or conclusions. Examples of such activities include (as appropriate to the module):

- O Project Quality Concern investigations and Readiness Review screening of Quality Concerns.
- o Readiness Review screening of NRC Inspection and Enforcement (I&E) Bulletins.
- O Project QA's independent review and verification of corrective action to NRC and Unit 1 RRFs.
- o Readiness Review screening and factoring into Unit 2 assessment plans, as appropriate, of occurrences in Unit 1 start-up and operation.

Section 6. will be organized as follows:

- o 6.1 Introduction;
- o 6.2 Program Description;
- o 6.3 Summary and Conclusions;
- o 6.4 Assessment Activities and Results;
- o 6.5 Unit 2 Findings.

Assessment of Module Adequacy (7.)

This section will contain statements from the Project organizations being assessed, Project QA, and the Readiness Review Board attesting to the accuracy of the information contained herein and the adequacy of the work under review.

Assessment Plan and Checklists (8.)

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5.5 WRITING OF MODULES AND GENERAL APPENDIXES

When data has been collected through the use of the commitment matrix, implementation matrix, the audit matrix, assessment checklists (reference procedure 6.0), and other appropriate means, team members consolidate the information into the module or general appendix format and prepare a draft of the module/general appendix.

When a complete draft of a section of the module or general appendix is finished, copies of the section will be distributed for comments to the following individuals:

- o Readiness Review Board module sponsors;
- o Readiness Review program manager;
- o Team leader(s);
- o OA;
- o Project.

Each draft will contain a cover page outlining the distribution and stating the date all comments are to be returned. The comment period will normally be seven days.

All comments will be made clearly on the draft copies and returned to the team leader for consideration. If necessary, the team leader will schedule a meeting to resolve comments.

The team leader will review the final draft for:

- o Technical accuracy;
- o Technical adequacy;

- o Completeness of discussion;
- o Format;
- o Clarity of writing/illustrations;
- o Grammatical correctness.

The completed module is then issued for review in accordance with Section 6 of this manual.

TYPICAL MODULE FORMAT

Preface

Executive Summary

- 1. Introduction
- 2. Organization
- 3. Commitments
- 4. Program Description
- 5. Audits, NRC Inspections, Special Investigations, and Unit 1 Findings
- 6. Program Assessment
- 7. Assessment of Module Adequacy
- 8. Assessment Plan and Checklists

1

6. ASSESSMENT OF MODULE ADEQUACY

6.1 PURPOSE

The purpose of this procedure is to define the process, requirements, and responsibility for assessing the adequacy of the Unit 2 Readiness Review modules.

6.2 SCOPE

This procedure applies to the evaluation of Unit 2 Readiness Review modules by the Readiness Review Task Force, the responsible project organizations, Project Quality Assurance, and the Readiness Review Board.

6.3 RESPONSIBILITIES

The Readiness Review Program Manager is responsible for the overall implementation of the Readiness Review Program procedures.

Readiness Review Team members are responsible for performing an assessment of each module during the development process.

It is the responsibility of the project general managers and their staffs to evaluate appropriate module sections covering their areas of the work effort.

The Readiness Review Board Chairman is responsible to summarize consensus assessment by the Readiness Review Board for each module submitted. Evidence of this consensus will be recorded in the Readiness Review Board meeting minutes and such statement will be included in each module.

6.4 GENERAL

Each module shall have an "Assessment of Module Adequacy", Section 7, which shall contain as a minimum:

A statement by the appropriate project organizations attesting to the accuracy of the module and acceptability of the work activities covered by the module.

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- o A statement of certification as to the accuracy and technical correctness of the module's conclusion by the Readiness Review Program Manager.
- A Quality Assurance statement attesting to the adequacy of the work activities covered by the module and as noted during the audit/assessment of those activities.
- o A statement of acceptance of the module and its conclusion by the Readiness Review Board.

6.5 ASSESSMENT PROCEDURE

6.5.1 READINESS REVIEW TEAM MEMBERS

Readiness Review Team members collect data and perform verification for the module in accordance with sections 3, 4, 5, and 8 of this manual. The evaluation of the data, including Project responses to findings, is factored into the conclusions and is presented to the Readiness Review Board by the team leader(s). The conclusion shall be included in the executive summary and/or other appropriate sections of the module.

6.5.2 RESPONSIBLE PROJECT ORGANIZATIONS

Department managers whose line supervisors are or have been responsible for the work identified in a module will be requested to conduct an internal assessment of the module. This assessment will include an evaluation of the appropriate module sections for the correctness and completeness of the description of their work, activities, or responsibility.

The assessment is to be documented by signature of appropriate project management on a letter, or other suitable means, signifying concurrence with the module.

6.5.3 QUALITY ASSURANCE

Project Quality Assurance is responsible for incorporating assessment plans prepared by Readiness Review into audits, verification of checklist items, and providing audit results to Readiness Review. Upon issuance of the draft module, Quality Assurance is responsible for reviewing the information contained, for concurrence with conclusions, and for providing a statement as to the adequacy of the work activities presented by the module.

6.5.4 READINESS REVIEW PROGRAM MANAGER

Upon completion of the module, the Readiness Review Program Manager shall provide a statement attesting to the accuracy of the module.

6.5.5 READINESS REVIEW BOARD

The following activities provide the basis for board assessment of the module. These activities may be accomplished by the assignment of module sponsors who act on behalf of the Board and provide status to the Board.

- o Reviews and approves module scoping.
- o Reviews and approves each assessment plan.
- Reviews and provides guidance on development of assessment policies and processes.
- o Monitors assessment activities by means of presentations from the Readiness Review Program manager and Readiness Review Program staff.
- o Reviews and assesses the resolution of module findings.
- o Reviews and comments on the module.
- o Reviews and accepts, where found to be adequate, module conclusions.

Upon completion of these activities, the chairman of the Readiness Review Board shall premare and sign a statement of consensus acceptance of the module contents and conclusions for inclusion in the module.

8. ADMINISTRATIVE CONTROLS

8.1 PROCEDURE PREPARATION AND CONTROL

8.1.1 PURPOSE

The purpose of this procedure is to define the responsibilities and the requirements for the preparation, approval, and control of the Vogtle Project Readiness Review program procedures and revisions.

8.1.2 SCOPE

This procedure applies to procedures required to implement the Readiness Review program.

8.1.3 RESPONSIBILITIES

The Readiness Review program manager is the final approval authority for Readiness Review program procedures and is responsible for the overall implementation of the Readiness Review program procedures manual.

The individual manual holders are responsible for the configuration of their manuals.

8.1.4 FORMAT

The title of the manual shall appear at the top of each page of this manual.

The issue date shall appear in the upper right corner of each page of each procedure.

The bottom line of the first page of each procedure shall contain the revision number, the revision date, and the approval signature of the Readiness Review program manager.

Revisions to procedures shall be indicated by a change bar in the right margin, numbered corresponding to revision number, indicating the lines that were changed from the preceding revision.

Revision: O Issue Date: September 28, 1987

Readiness Review Program Manager

Figures and illustrations will be placed at the end of the procedures and numbered using the procedure number plus another sequential number beginning with one (e.g., 8.1-1 would be the first figure/illustration to this procedure).

8.1.5 CONTENT

Each procedure shall have a statement of purpose which clearly defines the objective of the procedure.

Following the statement of purpose, each procedure shall have a scope statement which clearly defines the intended applicability of the procedure.

Following the scope statement, each procedure shall have a statement or statements which clearly define responsibilities for implementation.

Each procedure shall, at a minimum, contain sufficient description to identify what must be done and when, where, how, and by whom it is to be accomplished.

8.1.6 INITIATION

Any member of the Readiness Review Team may initiate a draft procedure or draft revision to a procedure for consideration by the Readiness Review program manager.

Drafts considered appropriate by the Readiness Review program manager shall be distributed to the task force members for detailed review.

Comments generated from this review shall be forwarded to the draft originator for resolution.

The originator shall disposition and attempt to resolve all comments. Comments that cannot be resolved in this manner shall be presented to the Readiness Review program manager who will provide final resolution.

Upon resolution of comments, the procedure shall be presented to the program manager for approval signature.

8.1.7 DISPOSITION, RETURN, AND TRANSFER OF MANUALS

The distribution of the Vogtle Project Readiness Review Program Procedures Manual shall be as follows:

- o The Readiness Review program manager shall designate those individuals to be assigned controlled copies of the manual.
- o The Readiness Review program manager shall maintain a controlled distribution list, assign copy numbers, and issue the procedures manuals and subsequent revisions.
- o Manual holders shall notify the Readiness Review program manager via memo and return the manual when the manual is no longer required.
- o Manual holders shall notify the Readiness Review program manager via memo when a manual is being transferred to another individual.

8.2 DEFICIENCY REPORTING

8.2.1 PURPOSE

The purpose of this procedure is to define the methods by which items or activities considered by the Readiness Review Team to be in noncompliance to project commitments, specifications, drawings, or procedures, are identified, reported to the responsible organizations, tracked, and resolved to the satisfaction of the Readiness Review Team. This procedure is not intended to bypass, in part or wholly, existing project deviation reporting systems.

8.2.2 SCOPE

This procedure applies to items found by Readiness Review Team members which are determined to be in noncompliance with project commitments, specifications, drawings, or procedures.

8.2.3 RESPONSIBILITIES

8.2.3.1 Readiness Review Program Manager

The Readiness Review program manager is responsible for overall implementation of the Readiness Review program.

8.2.3.2 Readiness Review Team Members

The Readiness Review Team members are responsible for identifying findings, identifying responsible responding organizations, obtaining commitment dates compatible with module schedules, and acceptance of project resolutions. In addition, team members are responsible for ensuring that findings and appropriate response documentation are retained in the Readiness Review permanent files.

8.2.3.3 Clerk

The Readiness Review clerk is responsible for maintaining the Readiness Review Finding (RRF) log book and assigning unique numbers to the RRFs as requested by the team leaders. The clerk makes distribution of RRFs as required.

Revision: 2 Issue Date: 3-15-88

Readiness Review Program Manager

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8.2.3.4 Quality Assurance

Quality Assurance (QA) is responsible for reviewing each RRF for potentially reportable conditions in accordance with QA department procedures.

NOTE

Engineering, Construction, and Readiness Review are responsible for notifying QA of any identified potentially reportable conditions as per Project Policies and Procedures Manual, Procedure 7.2.

8.2.3.5 Responsible Organization Managers

The responsible organization managers are to provide timely and complete responses. The responsible manager's signature is required for all final responses (see section 8.2.4.3).

8.2.4 INITIATION AND PROCESSING

8.2.4.1 Initiation

Readiness Review Team members, upon discovery of an apparent noncompliance to project commitments, specifications, drawings, or procedures, shall initiate a RRF on the RRF form (see Figure 8.2-1) citing the requirement and the apparent noncompliance. All initiated RRFs are then forwarded to the team leader for review.

The Readiness Review team leader shall evaluate the finding and determine whether the identified noncompliance appears to be valid. If the finding is judged to be valid, the team member shall enter on the form, the organization(s) responsible for resolution, the required response date in the appropriate block, the unique RRF number obtained from the Readiness Review Task Force clerk, his name in the originator's box, and the date in the adjacent box.

If the RRF is determined by the team leader to be invalid, the team leader shall enter an explanation on the ...rm and return the finding to the originator.

NOTE

The originator, at any time, may discuss with the program manager deficiencies rejected by the team leader the originator considers valid.

After approval by the team leader, the finding is forwarded to the program manager for his approval.

8.2.4.2 Processing

A copy of the RRF will be transmitted by memo from the Readiness Review program manager to the responsible organization for resolution. Copies of the transmittal shall be forwarded to the Project director, functional organizational manager against which the finding is written, Unit 1 Nuclear Operations - Nuclear Safety and Compliance, Project QA for review for reportability, and the finding originator. Copies of findings identified during Module 23, Plant Security, assessment activities will be forwarded to the Plant Security manager instead of QA for evaluation.

The original is filed subsequently in the RRF log book. For findings issued by QA, Readiness Review receives a copy and files it in the RRF log book.

8.2.5 RESOLUTION AND CLOSURE

NOTE

This procedure section addresses RRFs and findings (Audit Finding Reports issued by GPC QA, Corrective Action Requests issued by Bechtel QA) issued by QA while performing a Readiness Review function.

8.2.5.1 Resolution

As defined in the guidelines on Figure 8.2-1, Sheet 2, the responding organization will perform remedial, investigative, and corrective action, as required, to resolve the finding. The response should identify the root cause of the discrepancy, the extent, any actual or potential impact upon hardware, and a

2

summation of the significance of the discrepancy, as appropriate.

When appropriate, the responsible organization should initiate and issue any Deviation Reports (DRs), Deficiency Evaluation Reports (DERs), or other reporting forms as required by applicable QA program requirements.

A complete resolution response should be contained on an attachment to the the finding. Copies of related DRs, DERs, etc. should be attached as appropriate. The response shall reference the finding and be signed and dated by the manager having responsibility for the work, (e.g., department manager construction findings) and returned promptly to the originating organization. Copies shall be distributed to Project QA and Readiness Review as appropriate.

NOTE

In the event all required actions cannot be completed in time to support the module publication, the response should provide a suitable action plan, including commitment dates.

8.2.5.2 Evaluation of Project Response

Upon receipt of the finding response, the appropriate team shall evaluate the response for acceptability. Acceptable responses shall be approved by the originator and Readiness Review program manager and subsequently filed in the RRF log. The RRF tracking log shall also be closed out.

If rejected, the responsible organization shall immediately be verbally informed of the reasons for rejection with a memo following to that effect.

After resolution, copies of the finding and response shall be transmitted to the originator, Project QA (Plant Security manager for Module 23), Unit 1 Nuclear Operations - Nuclear Safety and Compliance, and Readiness Review.

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8.2.5.3 Assessment of Significance

The team, after reviewing the finding response and upon consultation with the program manager, shall classify findings into levels of importance based on potential impact to plant safety. The following levels are used:

- Violation of licensing commitments, project procedures, or engineering requirements with indication of safety concern.
- II. Violation of licensing commitments or engineering requirements with no safety concerns.
- III. Violation of project procedures with no safety concerns.
- IV. Non-finding based on additional information/clarification supplied by the Project.

The level shall be indicated at the bottom of the finding form by adding the word "level" and the appropriate roman numeral, or by checking the appropriate box in the verification block as provided by the current revision to the RRF (Figure 8.2-1) form.

2RRF ORIGINATOR	DATE RESPONSIBLE ORGANIZATION
REQUIREMENTS:	an commence and a second se
FINDING:	
	RESPONSE
PROGRAM MANAGER APPROVALI	RESPONSE DUE DATE:
TEAM LEADER APPROVAL PROGRAM MANAGER APPROVAL LEVEL OI OII OIII OIV RESPONSE ACCEPTANCE ACCEPTED BY ORIGINATOR	

Figure 8.2-1
Readiness Review Finding Form (Sheet 1 of 2)

Response guidelines are shown on the reverse side

General Guidelines for Responding To Readiness Review Findings

Responses to Readiness Review findings are to be type-written with each clearly indicating the finding number and the person to contact in regard to the response. Each response must be approved by manager level or higher.

For each finding, the response must address:

I. INVESTIGATIVE ACTION

- What is the extent of the problem? Additional sampling for like deficiencies should be considered unless it can be adequately demonstrated that the finding is isolated or has already been determined to be generic.
- What is the significance of the specific deficiency? Is there any impact, actual or potential, on hardware, technical adequacy, test results, etc.?
- What is the collective significance of similar deficiencies noted by additional sampling or other Readiness Review findings?
- What is the root cause of the deficiency(s)?

II. REMEDIAL ACTION

- What has been done to correct the specific identified deficiencies?
- What has been done to correct like discrepancies identified during the investigative process?
- What has been done to resolve other similar problems when it is determined a generic deficiency exists?

III. ACTION TO PREVENT RECURRENCE

 What actions have been taken to assure that repetitive/generic deficiencies will not recur?

ADDITIONALLY:

- When required action cannot be completed to support finding due dates, a detailed action plan shall be submitted with milestone dates.
- If the finding results in the generation of DRs. DERs. LDDs. FCRs. procedure revisions, etc., this action along with final disposition must be reported to the Readiness Review Task Porce.
- Any subsequent response revisions must be forwarded to the Readiness Review Task Force.
- Results of committed to actions must be reported to the Readiness Review Task Force upon completion for review and retention in the permanent Readiness Review files.
- Responses should clearly indicate as appropriate what happened, why it happened, any mitigating circumstances or other information that will put the finding in perspective to a third party reader.
- Any conclusions regarding findings should be properly and adequately supported by objective evidence and/or sound logic.

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INSTRUCTIONS FOR COMPLETION OF THE READINESS REVIEW FINDING FORM

ITEM NUMBER: Enter a sequential number obtained

from the Readiness Review Task Force clerk consisting of two RRFs (module

number) - (sequential number).

ORIGINATOR: Enter the name of the person who

identified the discrepancy.

DATE: Enter the date the discrepancy was

identified.

RESPONSIBLE Enter the organization affected by the GRGANIZATION: finding and responsible for resolution

of the discrepancy and/or for supplying resolution (Example: BPC-PFE, Construction, Nuclear

Operating, etc.)

REQUIREMENTS: Enter the requirement and a reference

to the document and paragraph containing the requirement.

FINDING: Enter a description of the

noncompliance and how it differs from

the required condition.

RESPONSE DUE DATE: Enter the scheduled date for

completion of response.

TEAM LEADER APPROVAL/

PROGRAM MANAGER APPROVAL: (self explanatory)

LEVEL:

The team leader shall check the appropriate box indicating severity level of the finding based

upon the project's response.

ACCEPTANCE:

The team member and program manager approves the finding response upon acceptance.

NOTE

Finding responses will be provided upon separate documents attached to the finding report by the responding entity. All responses shall clearly indicate the finding number, response date, and contain the signature and title of the person making the response.

0096P/055-8

	DATE CA.			
	DESCRIPTION OF DOMPRECTIVE ACTION OF			
	FINDING			
	DATE RESPONSE			
E UNIT 2 EW PROGRAM KING LOG	DATE SENT			
PLANT VOCILE URIT 2 READMESS REVIEW PROGRAM ENGING TRACKING LOG	ORGANIZATION			
	DESCRETION OF ENDING			
	DENTERD			
	PROBAGE M. M. C.			
	3.700M			

Figure 8.2-3
Readiness Review Program
Finding Tracking Log

8.3 RESPONDING TO NRC ITEMS

8.3.1 PURPOSE

During the course of performing their evaluation of the modules and appendices, the Nuclear Regulatory Commission (NkC) may identify questions or issues that will require a response. This procedure outlines the steps to be taken to ensure timely and accurate responses to these items.

8.3.2 SCOPE

The following NRC items are addressed by this procedure:

Category I - Inspector Follow-up Items (IFI)
Unresolved Items (URI)
Violations
Deviations
Deficiencies

Category II - Written or verbal questions requiring a written response.

8.3.3 PROCESSING NRC ITEMS

Category I

Category I items are assigned tracking numbers by the NRC and will be entered in the Readiness Review action report for tracking (see Figure 8.3-1). Once the item is identified, Readiness Review will evaluate the item and, with Project help, identify the appropriate organizations to supply the response.

The Project Regulatory Compliance group will assist in this process and will also track the item in accordance with their procedures.

Inspector Follow-up Items (IFI) and Unresolved Items (URI) do not require a written response to be formally submitted to the NRC but do require a written response submitted to Readiness Review for approval prior to submittal to the compliance coordinator for retention.

Revision: O Issue Date: September 28, 1987

Readiness Review Program Manager

NRC violations and deviations require a formal response to the NRC by Project and will be coordinated by the compliance coordinator in accordance with procedure GD-A-41. Prior to submittal, the draft response shall be concurred with by Readiness Review.

Category II

Questions from the NRC are tracked by Readiness Review who has sole responsibility for ensuring timely response to those questions. Questions are tracked in the Readiness Review Action Report.

Questions are of two types, those formally submitted in a letter and verbal questions requiring a formal response. Verbal questions answered verbally are not covered by this procedure.

When questions in the scope of this procedure are received, Readiness Review will identify who should supply the information for the response. A member of the Readiness Review Task Force will then work with these individuals to ensure the question is fully and correctly answered.

Once answers are formulated, Readiness Review will draft the letter to the NRC. The letter will be forwarded to licensing and the appropriate Project organizations for review and comments. Once all comments are resolved the letter will be signed by a project executive and mailed to the NRC.

NOTE

Each person involved in the preparation, review, coordination, and approval of correspondence to the NRC is accountable, within his area of responsibility, for (1) ensuring the overall accuracy of information, (2) ensuring that no misstatements are made in correspondence, including clerical errors, transposition or errors made through simple negligence, (3) ensuring proper concurrence by other organizational entities who are involved in or affected by the subject matter, and (4) ensuring complete and proper implementations of any actions.

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(F) PLANT VOGS EADINESS RE PROCE GILE U REVIEW EDURES (O PROG 2 RA

3

READINESS REVIEW PROGRAM ACTION TRACKING LOG

RESPON-

SIBLE

EDIT ITEM DATE MOD- ORGANI - DATE RR DATE NRC DATE SOURCE NO. LEVEL ITEM SUBJECT ISSUED ULE ZATION DUE STATUS COMP STATUS CLOSED

EXPLANATION OF FIELDS

EDIT NO - The computer record number.

- Identification of type and source of action item. SOURCE

> MRC INSP REPORT - Nuclear Regulatory Commission (NRC) inspection report. NRC LETTER - Letter from the NRC.

NRC PEVIEW QUESTION - Question transmitted informally from the NRC during the course of a module review.

NRC TELECON - Telephone conversation with the NRC.

- The NRC identified item number or a Readiness Review assigned number ITEM NO consisting of the module number and a sequentially assigned number.

LEVEL - Finding level of significance.

ITEM SUBJECT - Subject of the action item.

DATE ISSUED - Date issued by the source.

MODULE - Readiness Review module.

RESPON ORGEN - The Project organization responsible for the action.

- Those activities identified to take place to respond or resolve the ACTION concern.

DUE DATE - Readiness Review assigned date in-light-of actions required to respond to the NRC.

RR STATUS - Identified as open until Readiness Review is satisfied that the response is acceptable or action is complete; reassigned as closed.

DATE COMP. - Date that Readiness Review status is changed to closed.

Identified as open until the NRC identifies the response or action is acceptable. Status is then re-assigned as closed,

CLOSED DATE - Date that NRC status is changed to close.

8.4 TRAINING

Each employee shall receive indoctrination upon assignment to the Readiness Review program and specific training in the requirements of the program.

8.4.1 INDOCTRINATION

Indoctrination shall consist of, but is not limited to:

- o The objectives of the Readiness Review program.
- o A description of the plant.
- o A description of the site organization and management.
- o The Quality Concern program.
- o The documents and procedures to be used.

8.4.2 SPECIFIC TRAINING

In addition to indoctrination, each employee shall receive specific training in the requirements of the program procedures and revision.

Supervisory personnel shall determine which procedures require presentation and use by subordinates and will give training accordingly. Revisions to procedures shall also be handled in this way.

8.4.3 IMPLEMENTATION

Supervisory personnel will be responsible for the indoctrination of all subordinates and will document the training on the Readiness Review Program Training Indoctrination form, Figure 8.4-1 or the Readiness Review Program Training Report, Figure 8.4-2.

These forms will be maintained in the employee's Readiness Review personnel file maintained by the Readiness Review program staff.

Revision: O Issue Date: September 28, 1987

Readiness Review Program Manager



Vogtle Project

READINESS REVIEW PROGRAM TRAINING INDOCTRINATION

EMPLOYEEE	-	
S S NUMBER	DATE	
The following indoctrination subjects were explaine		
		loyee's
The objective of the Readiness Review Program		
2 A description of the plant		
A description of the site organization and manage	pement	
The Quality Concern Program		
The documents and procedures to be used		
Other (Explain)		
	SUPERVISOR	-

NOTE. This document is to be filed in the employee's personnel file maintained by Readiness Review.



Vogtle Project

READINESS REVIEW PROGRAM TRAINING REPORT

EMPLOYEES			Total and the contract of the days
			-
			Mark Committee of the C

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ATE AND PLAC	Ε		

FTAILS OF TRA	AINING		
			No. 100 (100 (100 (100 (100 (100 (100 (100
			SUPERVISOR

NOTE. The original will be maintained by the supervisor, and a copy will be placed in each employee's personnel file.

8.5 SAFEGUARDS INFORMATION CONTROL

8.5.1 PURPOSE

This procedure establishes the requirements for controlling and distributing Safeguards Information received or originated by the Readiness Review Team during preparation and assessment of Readiness Review Module 23, Plant Security.

8.5.2 SCOPE

This procedure applies to the development, receiving, issuing, storage, and use of documents received or originated by Readiness Review. This procedure applies to all Readiness Review personnel and is not intended to invalidate any of the applicable requirements of procedure number 00650-C of the Project Administrative Procedures Manual.

8.5.3 RESPONSIBILITIES

8.5.3.1 Readiness Review Program Manager

The Readiness Review Program Manager is responsible for overall implementation of this procedure.

8.5.3.2 Readiness Review Team Leader

The Readiness Review Team Leader for Module 23 is responsible for determining which information should be classified as Safeguards.

8.5.3.3 Readiness Review Team Members

The Readiness Review Team members are responsible for complying with this procedure when receiving or originating safeguard documents and during storage and use of safeguards documents.

Revision: O Issue Date: January 20, 1988

Readiness Review Program Manager

8.5.4 GENERAL

8.5.4.1 Information to be Protected

The specific types of information, documents, correspondence, reports, etc. to be protected are those dealing with details of the Plant Security System, including:

- o Plant security and contingency plans.
- Engineering drawings, vendor documents, sketches or descriptions of intrusion alarms, guard posts, or other security equipment.
- o Portions of guard training and qualification plans, related to response of attacks or threats, or which reveal details of security equipment.
- o Guard orders or procedures, excluding routine duties such as traffic control, material passes, etc.
- o Response and patrol routes.
- Information related to on-site or off-site response forces.
- o Communication methods or equipment.
- Correspondence, inspection reports, and audits that reveal Safeguards Information.
- o Information related to specific spent fuel shipments (shipping routes and quantities of spent fuel are not classified).
- O Drawings or documents that explicitly identify certain areas or equipment as being vital for purposes of physical protection.
- O Draft and final copies of the Readiness Review Module 23, including completed checklists and findings.

8.5.4.2 Access to Safeguard Information

- A. Only personnel who appear on the immediate access list will be allowed to sign out and remove Safeguards Information and to receive Readiness Review originated documents.
- B. Personnel that have been fingerprinted may access Safeguards Information on a need to know basis with the approval of the Readiness Review Program Manager or his designee.

8.5.4.3 Protection While in Use and Storage

- A. While in use, Safeguards Information shall be controlled by the person authorized for access. This individual must limit access to the information to those individuals who have a "need to know". Safeguards Information must be attended by an authorized individual, even though the information may not be in constant use.
- B. While unattended, safeguards documents shall be stored in a locked GSA approved security storage container or in a metal storage cabinet provided with a locking bar and a GSA approved combination lock.
- C. A log shall be maintained listing all safeguards documents contained in the storage cabinet (Figure 8.5-1). Each document shall be assigned a sequential control number.
- D. Individual items of correspondence, with or without attachments, may be stored in file folders with a common control number. Individual sequential numbers are not required for each item if the item is identified by a correspondence log number.
- E. Authorized individuals removing documents from the containers shall log the documents in the Safeguard Document Sign Out Log (Figure 3.5-2).

8.5.4.4 Preparation and Marking of Documents

A. Readiness Review shall ascertain that any safeguard documents received by Readiness Review are properly marked in accordance with administrative procedures. Originator shall be notified of any omission for immediate correction.

- B. Safeguard documents originated by Readiness Review shall be conspicuously marked with an approved Safeguards Information stamp (Figure 8.5-3, item a or b). Each page of the document shall be stamped. In addition, the first page of the document shall be identified with an assigned copy number and the name of the assigned individual (Figure 8.5-3, item c).
- C. Readiness Review shall ascertain that the receiving individual has been authorized access to Safeguards Information before issuing the document.
- D. Cover letters or transmittal documents used to transmit safeguards documents shall not contain Safeguards Information and shall be stamped indicating that the cover document is decontrolled when separated from safeguards attachments (Figure 8.5-3, item d).

8.5.4.5 Reproduction and Destruction

- A. Safeguard documents originated by others shall not be reproduced in whole or in part. If additional copies are required, they should be obtained from the originating organization.
- B. Safeguard documents originated by Readiness Review shall be reproduced by authorized personnel to the minimum extent possible consistent with the needs for minimum distribution. All reproductions shall be assigned a copy number per sections 8.5.4.4.B and 8.5.4.6.B.
- C. Safeguard documents no longer needed for the work shall be returned to the issuing department or destroyed by any method that assures complete destruction of the Safeguards Information they contain. Destruction or return shall be documented on remarks column of the Safeguards Document Distribution Log.

8.5.4.6 External Transmittal of Safeguards Documents

A. Safeguards Information will be enclosed in two sealed envelopes or wrappers when being mailed on- or off-site. The inner envelope or wrapper will contain the name and

address of the intended recipient and should be marked on both sides, top and bottom, with the words SAFEGUARDS INFORMATION. The outer envelop or wrapper will show the recipient's name and address but shall not indicate that Safeguards Information is enclosed.

- B. A distribution log, shall be maintained listing all issued documents, copy numbers, and name of recipient of each copy (Figure 8.5-4).
- C. Recipients of Safeguards Information originated by Readiness Review shall be required to sign an acknowledgement certifying the receipt of the safeguards document (Figure 8.5-5).
- D. Safeguards Information shall not be transmitted over unprotected telephone lines except in emergencies. This restriction applies to telephone, telegraph, teletype, facsimile transmission, and radio. Exceptions to this policy may be granted only by the Readiness Review Program Manager.
- E. Safeguards Information may be transported by messenger-courier. United States first class, registered, express, or certified mail, or by an individual authorized access.

8.5.4.7 Use of Automated Data Processing Systems (WANG, PC, etc.)

- A. Word processing equipment may be used for preparation of safeguard documents. Documents generated shall be transferred to tapes, disketts, etc., and stored as specified in Section 8.5.4.3 and shall be deleted from the word processing program at the end of each day.
- B. Personnel responsible for performing word processing or text editing of generated documents shall be cleared for "NEED TO KNOW" according to Section 8.5.4.2.B.

8.5.4.8 Removed from Safeguards Information Category

A. Documents originally containing Safeguards Information shall be removed from the Safeguards Information category when the

information no longer meets the criteria specified in section 8.5.4.1.

B. Only the Readiness Review Program Manager and the Module 23 Team Leader are authorized to reclassify Safeguards Information.

READINESS REVIEW SAFEGUARDS DOCUMENTS STORAGE LOG

TEM NUMBER	SUBJECT	DATE RECEIVED.	DATE RETURNED	REMARKS

Readiness Review Safeguards Documents Storage Log

1-19-88

PLANT VOGTLE UNIT 2
READINESS REVIEW PROGRAM
PROCEDURES

PAGE

8.5-7

READINESS REVIEW SAFEGUARDS DOCUMENTS SIGN OUT LOG

TEM	USER'S NAME	STAC	TIME OUT	TIME IN
	and the second s			
		2		
			TAXABLE !	

PAGE

Figure 8.5-2 Readiness Review Safeguards Documents Sign Out Log

SAFEGUARDS

UNAUTHORIZED DISCLOSURE OF THIS INFORMATION IS SUBJECT TO CIVIL AND CRIMINAL PENAUTIES DO NOT DUPLICATE

Item a.

SAFEGUARDS INFORMATION

Item b.

SAFEGUARDS INFORMATION

COPY NUMBER: ______

item c.

SAFEGUARDS INFORMATION DECONTROLLED WHEN SEPARATED FROM ATTACHMENT

Item d.

Figure 8.5-3 Sample Safeguards Stamps

READINESS REVIEW SAFEGUARDS DOCUMENTS DISTRIBUTION LOG

SUBJECT:				
COPY	ISSUED TO:	DATE	ACKNOWLEDGE RECEIPTIDATE)	REMARKS
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			 	and the same of
1				
-	and the same of th			e manifes on
	er wer (

PAGE ____

Figure 8.5-4
Readiness Review Safeguards Documents Distribution Log

	DOCUMEN	VT TRANSMITTA	L
No.	Description		No. Issued To: Date
	an account of the first of the		
	DECETOR	ROWNING DIVIDE	PART
documents. I certif	above listed pro	ments in my	eguards Information
documents. I certification according to the control of the control	above listed pro	oprietary Saf	eguards Information
documents. I certif safeguarded in accor Control*.	above listed pro y that all docum dance with Proce	oprietary Saf ments in my edure 00650-0	eguards Information
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Figure 8.5-5
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