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Date: 13/13/94 Approved By: and Course

W. T. Cottle, Group Vice President, Nuclear

Approved By:

STP 724

\_ Date: 11/30/94

L. E. Martin, General Manager, Nuclear Assurance and Licensing

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3.0	Conduct of Plant Operations	6	12-20-91	
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16.0 Nuclear Fuel Management	5	12-30-94	
17.0 ASME Code Section XI - Repairs and Replacements	5	12-30-94	
18.0 ASME Code Section XI - Inservice Inspection and Testing	5	12-30-94	

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#### 1.0 <u>PURPOSE</u>

1.1 The purpose of this chapter is to describe the organizational structure as related to quality assurance and to establish the responsibilities of organizations for the South Texas Project Electric Generating Station (STPEGS).

#### 2.0 <u>SCOPE</u>

2.1 Houston Lighting & Power Company (HL&P), as licensee and Project Manager for itself and the other owners, has the Quality Assurance (QA) responsibility for design, engineering, procurement, fabrication, modification, maintenance, repair, in-service inspection, refueling, testing, and operation of the STPEGS.

#### 3.0 DEFINITIONS

3.1 None

4.0 <u>REFERENCES</u>

4.1 None

- 5.0 <u>RESPONSIBILITIES</u>
  - 5.1 The Nuclear Group is comprised of Nuclear Generation, Nuclear Engineering, Nuclear Assurance & Licensing (NA&L), Plant Services, and Human Resources and Access. The heads of these groups report to the Group Vice President, Nuclear.
    - 5.1.1 The Group Vice President, Nuclear, has overall responsibility for the implementation of the Operations Quality Assurance Program and approving the Operations Quality Assurance Plan (OQAP) and revisions thereto.
    - 5.1.2 The Vice President, Nuclear Generation is responsible for implementing quality program requirements applicable to staffing STPEGS with qualified personnel and acquiring and coordinating the assistance of internal and external organizations for the testing, operation, modification, maintenance and security functions of STPEGS.

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5.1.2.1 The General Manager, Generation Support; Plant Manager, Unit 1; Plant Manager, Unit 2; and Manager, Nuclear Security; report to the Vice President, Nuclear Generation.

- 5.1.2.2 The Plant Managers have prime responsibility for the safe operations of their respective units. The plant staff, under the direction of the Plant Managers, develop detailed procedures and instructions for testing, operation, modification, maintenance, and radiological monitoring of the STPEGS.
- 5.1.3 The Vice President, Nuclear Engineering is responsible for implementing quality program requirements applicable to the design engineering and control, systems engineering, nuclear fuels design, acquisition and management; engineering programs, and engineering support functions.
  - 5.1.3.1 The Manager, Design Engineering; Manager, Systems Engineering; Manager, Programs; Manager, Engineering Support; and Director, Nuclear Fuel and Analysis report to the Vice President, Nuclear Engineering.

5.1.4 The General Manager, NA&L is responsible for the development, maintenance, and independent verification of implementation of the STPEGS QA Program; making periodic reports on its effectiveness; review of selected documents which control activities within its scope; and preparation, control, and approval of the OQAP and revisions thereto.

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The General Manager, NA&L is also responsible for implementing quality program requirements applicable to STPEGS corrective action, licensing, emergency preparedness, and Independent Safety Engineering Group activities, and administration of the Nuclear Safety Review Board.

The General Manager, NA&L has the authority to identify, initiate, recommend, or provide solutions to quality-related problems and verify the implementation and effectiveness of the solutions. This position has the independence to conduct QA/Quality Control (QC) activities without undue pressure of cost or schedule.

The General Manager, NA&L, has the authority to stop work for cause. This authority in QA matters has been granted by the Group Vice President, Nuclear. The NA&L organization's quality responsibilities during operation are shown in Attachment II. The QA organization, including the inspection staff, is based upon the anticipated QA/QC involvement in operations, modification, and maintenance activities.

The position of General Manager, NA&L is on the same or higher organizational level as the highest line manager responsible for performing activities affecting quality as shown in Attachment I.

5.1.4.1 The Director, Quality; Manager, Operating Experience; Manager, Emergency Response; and Manager, Industry Relations report to the General Manager, NA&L.

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tions where the

5.1.4.2 The NSRB administratively reports to the Manager, Industry Relations. The NSRB functionally reports directly to and advises the Group Vice President, Nuclear.

- 5.1.4.3 The Director, Quality is responsible for Independent Safety Review Group activities, audits, independent assessments, surveillances, inspections and NDE examinations.
- 5.1.4.4 During the overview of activities performed by the NA&L organization, the Director, Quality; at his discretion; reports directly to the Group Vice President, Nuclear.
- 5.1.5 The General Manager, Plant Services is responsible for implementing quality program requirements applicable to nuclear training, planning and scheduling; maintenance of programs for records management, document control and information systems; and procurement and material control for STPEGS.
  - 5.1.5.1 The Manager, Nuclear Training; Manager, Records Management and Administration; Director, Nuclear Information Systems; Manager, Plant Projects and Programs; and Director, Nuclear Purchasing and Materials Management; report to the General Manager, Plant Services.
- 5.1.6 The Manager, Human Resources and Access is responsible for implementing quality program requirements applicable to personnel access authorization for the protected and vital areas of STPEGS.
  - 5.1.6.1 The Manager, Access Authorization reports to the Manager, Human Resources and Access.

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#### 6.0 <u>REQUIREMENTS</u>

- 6.1 The fundamental responsibility for implementing quality program requirements is assigned to all personnel performing activities affecting the safe and reliable operation of the STPEGS. These personnel and their management are responsible for implementing through approved procedures and other work documents, the quality assurance program controls described in the OQAP.
- 6.2 Attachment I depicts the organizational structure of the STPEGS as it relates to the implementation of the Operations Quality Assurance Plan. The structure reflects the reporting alignment for key positions. Line organizational details and responsibilities are further described in STPEGS UFSAR Chapter 13.1.

#### 7.0 DOCUMENTATION

7.1 None

#### 8.0 ATTACHMENTS

- 8.1 Attachment 1 Nuclear Group QA Functions
- 8.2 Attachment 2 Quality Responsibilities

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ATTACHMENT I

# HOUSTON LIGHTING & POWER COMPANY NUCLEAR GROUP - QA FUNCTIONS



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ATTACHMENT II

# **QUALITY RESPONSIBILITIES**



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#### 1.0 <u>PURPOSE</u>

1.1 The purpose of this chapter is to define criteria and establish administrative controls for implementation of the Operations Quality Assurance Program for the South Texas Project Electric Generating Station (STPEGS).

#### 2.0 SCOPE

- 2.1 The Operations Quality Assurance Program is applicable to safety-related material, equipment, services and activities described in 10CFR50, Appendix B; 10CFR71, Subpart H (except design and fabrication of NRC certified radioactive waste shipping (asks); ASME Boiler and Pressure Vessel Code, Sections III and XI; and quality related areas as defined by STPEGS management in this Operations Quality Assurance Plan (OCAP) or other program documents or procedures. Quality-related areas include the Fire Protection Program, Emergency Plan, Radiological Environmental Monitoring Program, Radwaste Management Program, Computer Program Verification and Control, Physical Security Program, Seismic and Environmental Equipment Qualification Programs, Radiation Protection Program, and Station Blackout (SBO) systems and equipment.
- 3.0 DEFINITIONS

3.1 None

- 4.0 <u>REFERENCES</u>
  - 4.1 10CFR50, Appendix B
  - 4.2 10CFR71, Subpart H
  - 4.3 ASME B&PV Code
  - 4.4 OQAP Chapter 14.0, Records Control
  - 4.5 10CFR50.63, Loss of All Alternating Current Power
- 5.0 <u>REQUIREMENTS</u>
  - 5.1 The Operations Quality Assurance Program consists of various documents which identify and provide the mechanism for verifying implementation of commitments, requirements, and actions necessary to attain quality assurance objectives.

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- 5.2 The OQAP is prepared to implement the STPEGS Operations Quality Assurance Program.
  - 5.2.1 The OQAP provides policies to be implemented for the STPEGS. The OQAP also assigns responsibilities necessary for the attainment of quality assurance objectives and the verification of conformance to established requirements.
  - 5.2.2 Attachment I provides a matrix of 10CFR50, Appendix B criteria to the OQAP chapters.
- 5.3 Establishing Policies and Goals
  - 5.3.1 QA policies and goals for STPEGS are defined in the OQAP. The Group Vice President, Nuclear has overall responsibility for quality assurance.
  - 5.3.2 The General Manager, Nuclear Assurance and Licensing (NA&L), is responsible for the development of the Quality Assurance (QA) Program. The minimum requirements established for this position are:
    - 5.3.2.1 A bachelors degree in science or engineering, or an equivalent combination of education and experience.
    - 5.3.2.2 Five years of experience in the management of quality assurance. Fifteen years experience in industry quality assurance standards, and federal and state regulatory requirements.
    - 5.3.2.3 Familiarity with nuclear power generation facilities and the related operations.
    - 5.3.2.4 Knowledge of the industry's quality assurance standards and regulatory requirements.
    - 5.3.2.5 Management experience and familiarity with HL&P corporate organizations.

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- 5.3.3 Procedures and revisions which control qualityrelated work programs and activities, performed by STPEGS organizations described in Chapter 1.0 are reviewed by QA as defined in this chapter.
- 5.4 Organizational Independence
  - 5.4.1 The reporting arrangement utilized by the NA&L Organization ensures that those personnel charged with responsibility for verifying compliance with QA Program requirements have the organizational freedom to:
    - 5.4.1.1 Identify quality problems.
    - 5.4.1.2 Initiate, recommend, or provide solutions.
    - 5.4.1.3 Verify implementation of solutions.
  - 5.4.2 The reporting arrangement, as illustrated on Attachment I, of Chapter 1.0, is such that personnel responsible for verifying compliance with quality requirements do not have direct responsibility for the performance of that work.
  - 5.4.3 The General Manager, Nuclear Assurance and Licensing, provides technical and administrative direction to the QA Managers in the areas of audits, surveillance, QA Reviews, inspection, and material testing.
- 5.5 QA Program
  - 5.5.1 HL&P has established the Operations QA Program for the operations phase of the STPEGS, which includes testing, operation, maintenance, refueling, inservice inspection, and modification. The HL&P Nuclear QA Program for the operations phase requires that HL&P, its contractors, subcontractors, and vendors comply with the criteria established by 10CFR Part 50, Section 50.55a; 10CFR Part 50, Appendix A, General Design Criterion (GDC) 1; 10CFR Part 50, Appendix B, and 10CFR Part 71 Sub-Part H.

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It is the intent of HL&P to comply, as defined herein, with the applicable American National Standards Institute (ANSI) N45.2 daughter standards, ANSI N18.7, and implementing Regulatory Guides (RG) as defined herein and in Updated Final Safety Analysis Report (UFSAR) Table 3.12-1.

### 5.6 Delegation of QA Functions

- 5.6.1 During normal operations the QA Program will be executed by STPEGS personnel, who may be assisted by subcontract personnel. During refueling, maintenance, and inservice inspection, first-level quality control inspection and nondestructive examination (NDE) activities may be subcontracted. However, STPEGS will retain responsibility for the total QA Program, and NA&L personnel will perform audits and surveillance(s) of subcontracted QA activities.
- 5.6.2 When first-level quality control inspection and NDE are performed by STPEGS personnel, they are qualified and certified in accordance with applicable codes, standards, procedures, and other regulations. Monitoring and surveillance of the quality control and NDE activities shall be performed by Operations QA personnel.

#### 5.7 Identification of Safety-Related Items and Services

5.7.1 The STPEGS QA Program described herein is applied to all activities affecting the safetyrelated functions of those structures, systems, and components which prevent, or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The safety-related structures, systems, and components controlled by the QA Program are listed in. UFSAR Section 3.2, along with their associated fire protection systems. UFSAR Section 3.2 also identifies those quality-related structures, systems, and components (in addition to fire protection systems) which are not safety-related but to which the STPEGS Operations QA Program is applied.

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- 5.7.2 The fire protection QA Program is part of the overall STPEGS Operations QA Program and is therefore under the management control of QA. Fire protection QA Program criteria are being implemented as part of the HL&P Operations QA Program, as defined in this OQAP.
- 5.7.3 Expendable or consumable items necessary for the functional performance of safety-related structures, systems, and components are subjected to quality assurance requirements as specified in written procedures. These procedures include provisions for review and control in accordance with industry standards and specifications and the safety-related function of the expendable or consumable item.
- 5.8 Development of the QA Program
  - 5.8.1 The Operations QA Program was fully implemented 90 days prior to initial fuel loading. The QA Program shall be in effect throughout the operating life of the STPEGS.
- 5.9 QA Program Documents
  - 5.9.1 The QA Program shall be implemented with documented instructions, procedures, and drawings which include appropriate quantitative and qualitative acceptance criteria for determining that prescribed activities have been satisfactorily accomplished. Procedures shall include the control of the sequence of required inspections, tests, and other operations when important to quality. To change these controls, the individual procedure must be changed and shall require the same review and approval given to the original procedure. Such instructions, procedures, and drawings are reviewed and approved for compliance with requirements appropriate to their safety classification by individuals qualified to do so.

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- 5.9.2 Procedures
  - 5.9.2.1 Procedures shall be established to implement and control activities covered by the OQAP and other operating, licensing and code requirements. When more than one department or organization is involved, these procedures provide for the integration of responsibilities and activities to ensure continuity of activity between departments or organizations.
    5.9.2.2 Specific departments or organizations
    - shall be designated for the preparation and approval of each procedure. Procedures which contain requirements for more than one department or organization require a designated procedure coordinator who is responsible for initiating review with affected departments or organizations and resolution of comments. Procedures shall be approved by the management of the issuing department.
  - 5.9.2.3 Selected procedures and revisions are reviewed by NA&L before their issuance. The review attests that these procedures have been reviewed for compliance with the Operations Quality Assurance Program. The review is documented and the comments on the current procedure revision will be maintained for verification.

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- 5.10 Personnel Indoctrination and Training
  - 5.10.1 General indoctrination and training programs shall be provided for site personnel to assure that they are knowledgeable regarding quality programs and requirements. The training requirements for STPEGS personnel are described in UFSAR Section 13.2. Records shall demonstrate compliance with applicable requirements. Personnel performing complex, unusual, or potentially hazardous work shall be instructed in special indoctrination or briefing sessions. Emphasis shall be on special requirements for safety of personnel, radiation control and protection, unique features of equipment and systems, operating constraints, and control requirements in effect during performance of work. Where required by codes and standards, personnel are trained, qualified, and certified according to written procedures in the principles and techniques of performing specific activities.
  - 5.10.2 Personnel performing surveillance testing activities shall be similarly trained in accordance with written procedures.
  - 5.10.3 Training will be conducted in a time frame adequate to allow personnel to prepare for their job responsibilities and before commencing quality-related work. Proficiency of personnel shall be maintained by retraining, reexamining, and/or recertifying in accordance with initial requirements and procedures.
  - 5.10.4 In addition to general employee training and indoctrination described above, departmental and interdepartmental procedures provide for training of personnel who perform qualityrelated work. These procedures provide for training in the principles and techniques of the activity involved and for maintenance of proficiency of personnel by retraining, reexamining, and/or recertifying to an extent commensurate with the safety significance of the activity. The procedures address documentation of:

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- 5.10.4.1 Scope, objective, and method of implementing the training program.
- 5.10.4.2 Documentation of the training sessions including attendees, dates, and results, where appropriate.

5.11 Policies and Goals

- 5.11.1 It is the policy of HL&P, acting as licensee and Project Manager for itself and the other owners of the STPEGS, to assure that the design, procurement, construction, testing, and operation of the STPEGS are in conformance with specifications, procedures, codes, and Nuclear Regulatory Commission (NRC) regulations. The responsibility of each organization supporting the STPEGS is to ensure that the requirements stated in this QA Program are incorporated into procedures. Adherence to those procedures is mandatory for all STPEGS organizations and contractors or vendors providing items or services covered by the QA Program.
- 5.11.2 The OQAP identifies activities and establishes requirements for procedures which identify, report, and verify the resolution of safetyrelated quality problems. The implementing procedures call for the resolution of quality problems at the lowest possible authorized level. However, if a dispute is encountered in the resolution of a quality problem which cannot be resolved at lower levels, Nuclear Assurance presents the problem to the Group Vice President, Nuclear, for resolution.

## 5.12 Control of Activities

5.12.1 The OQAP requires NA&L review and/or approval of procedures which control selected activities. These procedures shall require the use of the proper equipment, completion of prerequisites for starting an activity, and suitable environment for performing the activity. Procedures will comply with the appropriate standards. STP 're4 (02/90)

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5.12.2 STPEGS personnel attend planning, scheduling, and status meetings affecting quality-related activities as necessary to assure adequate QA coverage and program application exists.

#### 5.13 Management Review

- 5.13.1 The implementation of the QA Program requirements shall be verified through independent and integral control activities. The QA Organization, under the General Manager, Nuclear Assurance and Licensing, shall conduct audits, surveillance, and inspections of the operating plant and of the interfacing organizations' quality-related activities.
- 5.13.2 The results of the audits, surveillance, and inspection activities are presented in a pericuic report to the Group Vice President, Nuclear.
- 5.13.3 Assessments of HL&P's implementation of the Operations QA Program are conducted under the cognizance of the Nuclear Safety Review Board and results are transmitted to the Group Vice President, Nuclear for his review and/or action.
- 5.13.4 STPEGS may use the services of architectengineer firms, Nuclear Steam Supply System (NSSS) suppliers, fuel fabricators, constructors, and others which provide or augment STPEGS efforts during operations. These organizations are required to work under a QA program to provide control of quality activities consistent with the scope of their assigned work. The QA programs of such contractors or consultants shall be subject to review, evaluation, and acceptance by QA before initiation of activities affected by the program.

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- 5.14 Operations Quality Assurance Plan Changes
  - 5.14.1 HL&P is committed to maintaining the OQAP as an effective and meaningful document to provide programmatic direction on STPEGS. Changes to the QA Program, as described in the OQAP, will be processed under 10CFR50.54(a). When changes are made in the OQAP to the organizational elements only, appropriate notification will be made to the NRC within 30 days of implementation.

#### 5.15 Computer Code Programs

5.15.1 The development, control, and use of computer code programs which affect quality-related items will be controlled by OQAP. Prior to use of a computer code program in a quality-related activity, the appropriateness of the program shall be verified. In addition, all such programs shall be appropriately certified for use.

#### 6.0 DOCUMENTATION

- 6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.4.
- 6.2 Operations Quality Assurance Plan (OQAP)

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# 7.0 ATTACHMENTS

7.1 Attachment I OQAP - 10CFR50, Appendix. B Matrix

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3.0	Conduct of Plant Operations	V, XIV
4.0	Qualification, Training and Certification of Personnel	II, IX
5.0	Maintenance, Installation of Modifications, and Related Activities	III, V, VIII, IX
6.0	Design and Modification Control	III
7.0	Procurement	IV, VIII, X, XIII, XIV, VII
8.0	Control and Issuance of Documents	V, VI
9.0	Control of Material	VII, VIII, XIII, XIV
10.0	Inspection	х
11.0	Test Control	XI
12.0	Instrument and Calibration Control	XII
13.0	Deficiency Control	XV, XVI
14.0	Records Control	XVII
15.0	QA Audit and Surveillance	XVIII
16.0	Nuclear Fuel Management	III, IV, VII, VIII, X, XIII, XIV

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# OPERATIONS QUALITY ASSURANCE PLAN CHAPTERS 10 CFR 50 APPENDIX B CRITERIA

- 17.0 ASME Section XI Repairs and Replacements
- 18.0 ASME Section XI Examination and Testing

#### NOTE

These sections do not address 10 CFR 50 Appendix B criteria, but are included in the OQAP to identify STPEGS Code and ASME Section XI commitments.

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#### 1.0 <u>PURPOSE</u>

1.1 The purpose of this chapter is to establish requirements for qualification, training, and certification of personnel whose activities may affect quality-related structures, systems, components and activities at the South Texas Project Electric Generating Station (STPEGS).

### 1.0 SCOPE

2.1 This chapter provides for the qualification, training, and certification of personnel performing activities related to the structures, systems and components under the jurisdiction of the Operations Quality Assurance Plan (OQAP).

### 3.0 DEFINITIONS

3.1 None

#### 4.0 <u>REFERENCES</u>

- 4.1 Regulatory Guide 1.8, Personnel Selection and Training
- 4.2 Regulatory Guide 1.58, Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel
- 4.3 Regulatory Guide 1.146, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants
- 4.4 SNT-TC-1A, Recommended Practice for Nondestructive Personnel Qualification and Certification
- 4.5 10CFR55 Operator's Licenses
- 4.6 ASME Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components
- 4.7 OQAP Chapter 14.0, Records Control
- 4.8 INPO ACAD 92-004, Guidelines for the Conduct of Training and Qualification Activities

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#### 5.0 REQUIREMENTS

5.1 General

- 5.1.1 Position qualification requirements shall be established for personnel performing activities within the scope of this document in accordance with Reference 4.1, 4.2, 4.3, 4.4, 4.5 and 4.6.
- 5.1.2 Prog: s shall be developed for the qualification, training, and certification of personnel. The programs shall provide for:
  - 5.1.2.1 Establishing individual training files.
  - 5.1.2.2 Documented certification, when required (i.e., NRC licensed personnel, NDE personnel).
  - 5.1.2.3 Continuing training and retraining.
- 5.2 General Employee Training
  - 5.2.1 A general employee training program shall be developed and administered to all personnel requiring unescorted access within the protected and/or vital areas. This program shall address but not be limited to the following:
    - 5.2.1.1 Job related procedures and instructions
    - 5.2.1.2 QA program indoctrination
    - 5.2.1.3 Radiological health and safety
    - 5.2.1.4 Industrial safety and fire protection
    - 5.2.1.5 Emergency Plan
    - 5.2.1.6 Security program

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- 5.2.2 Temporary personnel employed at the STPEGS shall be trained in the above areas to the extent necessary to assure satisfactory performance of their duties.
- 5.3 Specialized Training Programs
  - 5.3.1 NRC licensed operators shall be qualified, trained and certified in accordance with Reference 4.1 and 4.5.
  - 5.3.2 Inspection, testing and examination personnel shall be qualified, trained, and certified in accordance with Reference 4.2.
  - 5.3.3 Nondestructive examination personnel shall receive training which meets the requirements of Reference 4.4 and 4.6.
  - 5.3.4 Audit personnel shall be qualified, trained and certified to the requirements of Reference 4.3.
  - 5.3.5 Other personnel shall be qualified, trained and certified commensurate with the functions they perform (e.g., welding, coating, chemical cleaning, maintenance, etc.).
- 5.4 Experienced personnel may be considered for exemption from prerequisite training. Training exemptions shall be controlled in accordance with approved station procedures.
- 5.5 Procedures shall provide for the evaluation of job performance of employees to determine the capabilities of the individual to meet established qualification requirements.
- 5.6 Procedures shall provide for the recertification of appropriate personnel in accordance with applicable standards.
- 5.7 Training and certification of personnel, to the degree necessary for the activity, shall be completed prior to assignment of work on quality-related items or activities.

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# 6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.7.

# 7.0 ATTACHMENTS

7.1 None

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#### 1.0 PURPOSE

1.1 The purpose of this chapter is to establish the requirements for procurement of items and services for the South Texas Project Electric Generating Station (STPEGS).

#### 2.0 SCOPE

2.1 This chapter applies to the procurement of qualityrelated items and services, and commercial grade items procured for dedication and use in a nuclear safetyrelated application. These activities include procurement document control, bid evaluation, vendor evaluation, verification of vendor act.vities and receiving inspection.

#### 3.0 DEFINITIONS

- 3.1 None
- 4.0 REFERENCES
  - 4.1 10CFR50, Appendix B
  - 4.2 10CFR21, Reporting of Defects and Noncompliance
  - 4.3 ANSI N45.2.12/Reg. Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants
  - 4.4 ANSI N45.2.13/Reg. Guide 1.123, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants
  - 4.5 ANSI N45.2.2/Reg. Guide 1.38, Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants
  - 4.6 ANSI N18.7/Reg. Guide 1.33, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants
  - 4.7 EPRI NP-5652 (NCIG-07), Guideline for the Utilization of Commercial Grade Items in Nuclear Safety Related Application
  - 4.8 OQAP Chapter 4.0, Qualification, Training and Certification of Personnel

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4.9 OQAP Chapter 13.0, Deficiency Control

4.10 OQAP Chapter 14.0, Records Control

#### 5.0 REOUIREMENTS

- 5.1 Procurement Document Preparation, Review and Control
  - 5.1.1 Responsibility for procurement is a joint effort of all the departments within the Nuclear Group. The department requesting the quality-related material or service provides tecnnical content. Design Engineering is responsible to review changes to the request for technical content and quality requirements. QA will concur with all changes to quality requirements.
  - 5.1.2 The sequence of preparation, review, approval, and issuance of procurement documents is generally as follows:

5.1.2.1 Purchase Requisitions

- Purchase requisition forms shall be used to initiate the procurement of quality-related materials, parts, components, services, and Commercial Grade Items (CGI). Procurement may be initiated by any Nuclear Group personnel.
  - Purchase requisitions shall include material and component identification requirements, drawings, specifications, standards, inspection and test requirements, and special process instructions as appropriate.

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Purchase requisitions for quality-related materials, parts, components, services, or CGIs shall be reviewed by the cognizant technical organization to verify that adequate technical and guality requirements have been specified. The reviews for technical and quality requirements shall be performed by someone other than the originator of the requisition. QA will concur with all changes to quality requirements.

# 5.1.2.2 Purchase Orders and Contracts

- Purchase orders and contracts are prepared and issued by Nuclear Purchasing and Material Management and establish for the suppliers the technical and quality requirements which must be met.
- Purchase orders and contracts shall accurately reflect the technical and guality requirements established by the Purchase Requisition. If, during the bid negotiations with the supplier, it becomes necessary or commercially desirable to change the technical or quality requirements, such changes shall be presented for approval to the cognizant technical organization which approved the original requirements.

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5.1.2.3 Change Controls

Additions, modifications, exceptions, and other changes to procurement document quality and technical requirements shall require a review and approval equivalent to that of the original document. Commercial consideration changes not affecting the technical or quality requirements may not require review and concurrence by the originator.

- 5.1.3 For the procurement of spare or replacement parts, equipment, materials, and services, the quality and technical requirements shall be equal to or greater than the design basis requirements for the original part, equipment, materials or services; except where less stringent quality or technical requirements may be established based on specific evaluations and justification. The cognizant technical organization shall document such justification.
  - 5.1.3.1 Safety-related items may be procured as CGIs if a documented engineering evaluation indicates the CGI will provide equivalent performance.
  - 5.1.3.2 The cognizant technical organization shall verify that quality requirements are correctly stated, verifiable, and controllable; that acceptance/rejection criteria are included; and that the documents have been prepared, reviewed, and approved in accordance with STPEGS QA Program requirements.

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- 5.2 Procurement Document Content
  - 5.2.1 Procurement document control measures shall assure that appropriate regulatory requirements, design bases, and other requirements are included in the procurement process. Originating and reviewing organization procedures shall require that the following be included or invoked by reference in procurement documents as appropriate:
    - 5.2.1.1 Applicable regulatory, code, and design requirements, including applicable material and component identification requirements, drawings, specifications, standards, inspection and test requirements, special process instructions and handling, preservation, cleaning, storage, packaging and shipping requirements. These requirements shall equal or exceed the original requirements and be sufficient to preclude repetition of defects.
    - 5.2.1.2 Extent that supplier QA program shall comply with 10CFR50, Appendix B or the QA program requirements of other nationally recognized codes and standards, as applicable; or for CGIs to be dedicated for safety related use by HL&P based on the results of a survey of the vendor's controls, the vendor's HL&P approved and/or surveyed program.
    - 5.2.1.3 Requirements for supplier documents, such as instructions, procedures, drawings, specifications, inspection and test records, and suppliers' QA records to be prepared, submitted, or be made available for review and/or approval by STPEGS personnel.

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5.2.1.4 Requirements for suppliers of quality-related items to maintain the status of required inspections or tests throughout the manufacturing process to preclude inadvertent bypassing of such inspections and tests.

- 5.2.1.5 Requirements for HL&P's right of access to suppliers' facilities and work documents for inspection and audit.
- 5.2.1.6 Requirements for extending applicable STPEGS procurement requirements to lower-tier suppliers and subcontractors, including HL&P's access to facilities and records.
- 5.2.1.7 Requirements for supplier reporting to STPEGS nonconformances to procurement document requirements and conditions for their disposition.
- 5.2.1.8 Requirements for the retention, control, and maintenance of supplier QA records that are not maintained by HL&P. Supplierfurnished records shall include:
  - Documentation that identifies the purchased item and the specific procurement requirements (e.g., codes, standards, and specifications) met by the item.
  - Documentation identifying any procurement requirements that have not been met.
  - A description of those nonconformances from procurement requirements dispositioned "accept-as-is" or "repair".

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- 5.2.1.9 Requirement for the supplier to submit a copy of its QA program description (does not apply for CGIS).
- 5.2.1.10 Requirements for the performance of maintenance and receipt inspection checks where applicable.
- 5.2.1.11 Applicability of 10CFR21 reporting requirements.
  - The reporting requirements of 10CFR21 do not apply to vendors of CGIs to be dedicated for use by HL&P.
- 5.3 Bid Evaluation
  - 5.3.1 Bid Evaluations shall be performed to evaluate adherence to technical and quality assurance requirements.
- 5.4 Supplier Selection
  - 5.4.1 Suppliers of quality-related items or services shall be required to submit copies of their QA program description for evaluation prior to the issuance of a purchase order or execution of a contract, and acceptability shall be documented. The process by which suppliers are judged as being a capable procurement source is described as follows:
    - 5.4.1.1 Procurement source evaluation and selection involves QA, Engineering, NPMM, and STPEGS plant personnel, as appropriate. These organizations participate in the qualification evaluation of suppliers in accordance with written procedures.

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5.4.1.2

Measures for the evaluation and selection of procurement sources shall be specified in procedures and may vary depending upon the complexity and safety classification of the item or service. When procurement source evaluations are performed, the information to be considered shall include one or more of the following: Experience of users of identical or similar products of the prospective supplier, other utility or approved contractor audits/evaluations, audits/evaluations by cooperative utility groups, American Society of Mechanical Engineers (ASME) Certificates of Authorization, STPEGS records accumulated in previous procurement actions, and STPEGS product operating experience may be used in this evaluation. When other utility, contractor or cooperative utility audits/evaluations are used, the documentation will be obtained and reviewed. Supplier history shall reflect recent capability. Previous favorable experience with suppliers may be an adequate basis for judgments attesting to suppliers' capability.

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- An evaluation of the supplier's current quality records supported by documented qualitative and quantitative information which can be objectively evaluated. This may include review and evaluation of the supplier's QA Program Manual, procedures, and responses to questionnaires, as appropriate.
- A source evaluation of the supplier's technical and quality capability as determined by a direct evaluation of facilities and personnel (audit, survey, or surveillance) and quality program implementation. Resolution or a commitment to resolve unacceptable technical or quality requirements identified by the bid evaluation or vendor evaluation shall be obtained prior to the award of a purchase order or contract.

Procurement source evaluations involve a review of technical and quality considerations to an extent considered appropriate by each participant. Technical considerations include the design or manufacturing capability and technical ability of suppliers to produce or provide the design, service, item or component. Quality considerations include one of the previously stated methods of supplier evaluation and a consideration of a supplier's current quality program or capabilities.

5.4.1.3

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5.4.1.4 A documented quality assurance evaluation of a quality-related vendor's quality program shall be performed to assure it meets the appropriate requirements of 10CFR50 Appendix B, or where applicable, other nationally recognized codes and standards.

- 5.4.1.5 Vendors may be placed on the Approved Vendors List after passing this evaluation.
- 5.4.1.6 A vendor shall not be issued a purchase order or contract unless they have been accepted for placement on the Approved Vendors List or an exception has been approved by the Director of Quality Assurance.
- 5.4.1.7 Service organizations which will supply only manpower and no other service are not required to be on the Approved Vendors List or have an STPEGS approved quality assurance program as long as the supplied personnel are trained and work under the auspices of the STPEGS Operations Quality Assurance Plan.

5.4.2

- Each vendor on the Approved Vendors List shall be evaluated by Quality Assurance at least once each twelve months as provided by Reference 4.4.
  - 5.4.2.1 A vendor may be removed from the Approved Vendors List if evaluation determines the vendor is unacceptable, the vendor requests removal or by direction of the Director of Quality Assurance.

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5.4.3 Planning of verification activities to be employed for item or service acceptance shall begin during the purchase requisition or contract preparation and review stage. The extent of the verification activities will vary and be a function of the relative safety significance, complexity of the purchased item or service, and the supplier's past performance. The verification activities may include vendor surveillance, receipt inspection, or post-installation testing.Verification activities are planned to assure conformance to procurement document requirements. Procedures shall establish the organizational responsibilities for identifying required verifications and methods, performing and documenting the verification activities.

- 5.4.3.1 Vendor surveillance shall be performed using surveillance plans developed in accordance with QA procedures with appropriate input from the cognizant technical organization. The surveillance plan shall specify the characteristics or processes to be witnessed, inspected or verified, and accepted; the method of surveillance; and the documentation required.
- 5.4.3.2 Vendor surveillance inspections may be waived by the Director of Quality Assurance.
- 5.4.3.3 Vendor related reports shall be evaluated to determine the effectiveness of the vendor's quality assurance program.
- 5.5 Receiving Inspection
  - 5.5.1
- Received purchased items shall be inspected for shipping damage and the requirements of ANSI N45.2.2 Section 5.2.1 and the applicable attributes of Section 5.2.2.

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- 5.5.2 Receiving inspection shall be coordinated with vendor surveillance inspection. If vendor surveillance inspection is not performed or did not address all applicable attributes, receipt inspection shall be performed and shall include the applicable additional attributes listed in ANSI N45.2.2 Section 5.2.2, except for commercial grade items dedicated by survey which shall be receipt inspected as required by the procurement document.
- 5.5.3 Receiving inspection checklists shall be developed using the requirements specified in the procurement documents and applicable attributes of ANSI N45.2.2.
- 5.5.4 Statistical sampling methods may be used for groups of similar items. Sampling shall comply with nationally recognized methods or approved engineering alternates.
- 5.5.5 Receiving inspections shall be performed by personnel trained and qualified in accordance with Reference 4.8. Technical assistance shall be provided by Nuclear Generation or Nuclear Engineering as applicable.
- 5.5.6 Receiving inspection activities shall include:
  - 5.5.6.1 Identifying materials, parts, and components and their status upon receipt by tagging or other acceptable means of identification, or segregating and controlling items in receiving hold areas separate from the storage facilities for acceptable items. Identification of items shall correspond to the identification required by procurement documents and be noted on receiving documentation.

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	5.5.6.2	Verification of ite acceptance, includi for shipping damage	ems for this ng examinatio	n

5.5.6.3 Inspecting or testing, where appropriate, using approved procedures and calibrated tools, gauges, and measuring equipment for verification acceptance of items, including off-the-shelf items.

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- 5.5.6.4 Items determined to be acceptable for use shall be identified with an "accept" tag or other acceptable means of identification prior to release for storage or use.
- 5.5.6.5 Received items which do not conform to procurement documents are controlled and segregated (if practical) and processed in accordance with Reference 4.9.

5.5.7 Acceptance by post-installation test may be utilized following one of the preceding verification methods. Post-installation testing may be used for acceptance verification when it is difficult to verify item quality characteristics, the item requires an integrated system checkout or test, or the item cannot demonstrate its ability to perform when not in use. Engineering specifications shall be used for developing post-installation test instruction requirements and acceptance documentation. Post-installation testing is the responsibility of the Plant Managers, STPEGS, and is witnessed by QC personnel at specified hold points.

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5.5.8 Acceptance of Procured Items and Services

5.5.8.1 Acceptance of items and services shall be based on one or more of the following:

- Written certifications
- Supplier audit
- Source inspection
- Receiving inspection
- Vendor Surveillance
- · Post-installation test
- 5.5.9 Documented evidence from the supplier that procured items meet procurement quality requirements such as codes, standards, or specifications will be maintained at the plant site. Such evidence shall be provided by the supplier, at the time of source or receipt inspection, for review and verification before acceptance. The documented evidence will be retrievable and available at the plant site prior to installation or use of the procured item, unless otherwise controlled in accordance with OQAP Chapter 13.0, Paragraph 5.2.9.
- 5.6 Vendor Surveillance and Audit
  - 5.6.1 Suppliers Certificates of Conformance are periodically evaluated by audits, independent inspections, or tests to assure that they are valid and results are documented. When acceptance is based upon supplier audit or vendor surveillance, documented evidence shall be furnished to the plant receiving organization.

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5.6.1.1

Acceptance by vendor surveillance may be considered when the item or service is vital to plant safety; or the quality characteristics are difficult to verify after receipt; or the item or service is complex in design, manufacture, inspection, or test. Vendor surveillance involves a physical presence to monitor, by observation, designated activities for the purpose of evaluating supplier performance and product acceptance.

- 5.6.2 The STPEGS QA audit program provides for periodic scheduled audits of suppliers, the site procurement program, contractors, subcontractors, and others performing safetyrelated work. The audit schedule is prepared and updated by QA. Frequency of these audits is based upon the safety, complexity, and quality requirements, and as a minimum shall be in compliance with Reference 4.3.
- 6.0 DOCUMENTATION
  - 6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.10.

#### 7.0 ATTACHMENTS

7.1 None

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#### 1.0 <u>PURPOSE</u>

1.1 The purpose of this chapter is to establish requirements and responsibilities for the identification, documentation, evaluation, resolution, control and reporting of deficiencies.

#### 2.0 SCOPE

2.1 This chapter applies to deficiencies discovered in items, services and activities under the scope of the Operations Quality Assurance Plan and the reporting of items to the Nuclear Regulatory Commission (NRC) in accordance with Title 10 Code of Federal Regulations.

#### 3.0 DEFINITIONS

- 3.1 None
- 4.0 <u>REFERENCES</u>
  - 4.1 10CFR50, Appendix B
  - 4.2 10CFR21, Reporting of Defects and Noncompliance
  - 4.3 10CFR50.72, Immediate Notification Requirements for Operating Nuclear Power Reactors
  - 4.4 10CFR50.73, Licensee Event Report System
  - 4.5 South Texas Project Electric Generating Station (STPEGS) Technical Specifications
  - 4.6 OQAP Chapter 14.0, Records Control

#### 5.0 <u>REQUIREMENTS</u>

5.1 All personnel working under the jurisdiction of the Operations Quality Assurance Plan are responsible for reporting identified deficiencies to appropriate management for resolution in accordance with approved procedures.

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- 5.2 Procedures shall be developed for the control of items, services or activities which do not conform to established requirements. These procedures shall provide for the following:
  - 5.2.1 Identification and documentation of the deficient condition.
  - 5.2.2 Identification of the requirements, source, or reference information being violated.
  - 5.2.3 Notification of responsible management.
  - 5.2.4 Control of the deficient item or activity by tagging, segregation, administrative controls, or other appropriate means to prevent inadvertent installation, use, or continuation of the deficient activity and removal of such controls when the item is returned to service or availability.
  - 5.2.5 Resolution and/or disposition approved by authorized personnel prior to closing out the nonconformance documentation and restoring the item to normal service.
    - 5.2.5.1 Material nonconformance disposition categories are:
      - o "Use-as-is"
      - o "Reject"
      - "Rework" in accordance with documented procedures
      - o "Repair" in accordance with documented procedures
    - 5.2.5.2 "Use-as-is" and "repair" disposition of nonconforming items shall be oproved and justified in writing by . gineering.
    - 5.2.5.3 Evaluations shall be performed to ascertain recurrence control measures.

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- 5.2.6 Documentation of the corrective action taken.
- 5.2.7 Review and/or verification of the corrective action by Nuclear Assurance and Licensing, as appropriate.
- 5.2.8 Reinspection of repaired and reworked items shall be to criteria as stringent as those applied to the original work. Reinspection results are documented on inspection reports or other work process control documents.
- 5.2.9 Installation of nonconforming material, parts, and components may be performed after the effect of their installation has been evaluated and the installation approved by Plant Management and Engineering. Nonconforming items which may not be installed are those which, because of their makeup and intended use, cannot be repaired or reworked after being installed and those which, if installed and later removed, would degrade that system, structure, or component. Once installed, nonconforming items are not energized, used, or placed in service until the action required by the disposition, including reinspection, has been completed or an engineering evaluation has been prepared to justify the intended use of the nonconforming item.
- 5.2.10 Nonconformances identified on installed items will be evaluated for operability.
- 5.2.11 Disputes over corrective action are normally resolved by Plant Management. Should this resolution not be satisfactory, the parties may elevate the matter to higher management for resolution.
- 5.3 Procedures shall provide the following administrative controls of deficiencies.
  - 5.3.1 Unique identification and numbering of deficiencies.
  - 5.3.2 Preparing and maintaining status reporting of deficiencies.

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- 5.3.3 Actions to be taken to assure timely corrective action on deficiencies.
- 5.4 Procedures which identify and track deficiencies shall require management review of each report to determine if the condition is significant. For significant conditions adverse to quality, the cause of the condition and the corrective action taken to preclude repetition shall be documented and reported to appropriate levels of management.
- 5.5 Measures shall be established for review and evaluation of deficiencies for reportability to the NRC as required by Reference 4.1, 4.2, 4.3, and 4.4, as appropriate.
- 5.6 The authority to stop work has been assigned to the General Manager, Nuclear Assurance and Licensing for any activity being performed by company personnel or contractors which do not conform to established requirements.
- 5.7 Measures shall be established for the evaluation and trending of plant deficiencies. The results of these reviews and analyses are reported to the affected organization and executive management, and are audited by the QA organization. Significant adverse trends shall be handled in accordance with this chapter.

# 6.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.6.

#### 7.0 ATTACHMENTS

7.1 None

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QUALITY ASSURANCE AUDIT AND SURVEILLANCE	EFFECTIVE DATE 12/30/94	

#### 1.0 <u>PURPOSE</u>

1.1 The purpose of this chapter is to establish requirements for a system of audits and surveillance of quality assurance programs for the South Texas Project Electric Generating Station (STPEGS).

#### 2.0 SCOPE

2.1 This chapter provides for implementing a program of internal audits and site surveillance which include preparation, performance, reporting, and follow-up to ensure the requirements of the Operations Quality Assurance Program are being properly implemented.

#### 3.0 DEFINITIONS

3.1 None

#### 4.0 <u>REFERENCES</u>

- 4.1 ANSI N45.2.12/Reg. Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants
- 4.2 OQAP Chapter 4.0, Qualification, Training and Certification of Personnel
- 4.3 OQAP Chapter 7.0, Procurement
- 4.4 OQAP Chapter 13.0, Deficiency Control
- 4.5 OQAP Chapter 14.0, Records Control

#### 5.0 REOUIREMENTS

5.1 A comprehensive audit program in compliance with Reference 4.1 shall be established and implemented by HL&P to verify internal and external quality activity compliance with the Operations QA Program. The audit program shall assure that applicable elements of the program have been developed, documented, and are effectively implemented and shall provide for reporting and reviewing audit results by appropriate levels of management. The following areas are included in the audit program:

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- 5.1.1 Operation, maintenance, and modifications
- 5.1.2 Preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings
- 5.1.3 Material and special process control
- 5.1.4 Indoctrination and training programs
- 5.1.5 Implementation of operating and test procedures
- 5.1.6 Calibration of measuring and test equipment
- 5.1.7 Corrective action and nonconformance control
- 5.1.8 Performance of the plant staff, including training records
- 5.1.9 Plant inspection activities
- 5.2 Qualified personnel assigned auditing responsibilities shall be independent of any direct responsibility for 'he performance of the activities which they audit; 'hall be experienced or trained commensurate with the scope and complexity of the activities to be audited; and shall be qualified in accordance with the requirements of Reference 4.2.
  - 5.2.1 An audit team consists of one (or more) qualified person(s). A qualified lead auditor shall be appointed as the audit team leader. The audit team leader shall be responsible for the written plans, checklists, team orientation, audit notification, pre-audit conference, audit performance, post-audit conference, reporting, and follow-up activity to assure corrective action. The audit team leader shall promptly report conditions requiring immediate corrective action to the appropriate management of the audited organization. Other audit findings will be identified to the audited organization at the post-audit conference. Formal audit reports shall be prepared and submitted to the audited organization within 30 days after the postaudit conference.

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- 5.2.2 Other personnel may assist in the conduct of audits, such as technical specialists, management representatives, or auditors in training. Such personnel selected for auditing assignments shall have training or experience commensurate with the scope, complexity, or special nature of the activities to be audited. Personnel performing audits shall have no direct responsibility for the area audited.
- 5.3 An audit plan, approved by Nuclear Assurance Management, shall be issued annually to include:

5.3.1 Activities/organizations to be audited.

- 5.3.2 Time frame in which the audit will be conducted.
- 5.4 Internal Audits
  - 5.4.1 Internal audits shall be conducted by QA and shall be performed with a frequency commensurate with their safety significance, past performance and regulatory requirements. An audit of all safety-related activities shall be completed in accordance with formal audit schedules approved by the Director, QA.
  - 5.4.2 Review of the audit program shall be performed at least semiannually by the independent review body or by a management representative to verify that audits are being accomplished in accordance with the requirements of the QA Program.
  - 5.4.3 Audit results shall be reviewed periodically by the QA Organization for quality trends and overall audit program effectiveness. The results of these reviews shall be reported to appropriate management in periodic summary reports.
  - 5.4.4 Audited organizations are responsible for providing timely corrective action including action to prevent recurrence for programmatic problems identified by an audit or surveillance.

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- 5.5 Supplemental audits shall be conducted when:
  - 5.5.1 Significant changes are made to the quality assurance program.
  - 5.5.2 It is necessary to determine the root cause of problem areas which may impact the effectiveness of the quality assurance program.
  - 5.5.3 A systematic, independent assessment of program effectiveness is necessary.
  - 5.5.4 Requested by appropriate management.
- 5.6 Audit implementation shall include the following:
  - 5.6.1 Written notification to the audited organization of the scheduled audit, if an announced audit.
  - 5.6.2 Development of an individual audit plan/scope.

5.6.2.1 The audit plan and any necessary reference documents shall be available to the audit team members.

- 5.6.3 A pre-audit and post-audit conference with responsible organizational management.
- 5.6.4 Use of a checklist or procedure as a guide during the performance of the audit.
- 5.6.5 Identifying and documenting audit deficiencies.
- 5.6.6 Providing a written report of the audit within thirty days after completion of the audit to responsible management. The audit report shall address those items required by Reference 4.1.
- 5.6.7 Audited organizations provide timely and thorough corrective action and recurrence control to discrepancies identified during the audit. In the event that corrective action cannot be completed within thirty days, the audited organization's response shall include a scheduled date for the corrective action. Earlier dates for corrective action may be established if circumstances dictate.

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- 5.6.8 Evaluation of corrective action for deficiencies and follow-up verification as appropriate.
- 5.7 Assessments are conducted annually to assess HL&P's implementation of the Operations Quality Assurance Program. These assessments will be conducted by organizations independent of the activities performed to assure the HL&P OQAP is being properly implemented. The Nuclear Safety Review Board shall define the scope of the assessment and determine the schedule. The results of these assessments will be transmitted to the Group Vice President, Nuclear.
- 5.8 Procedures shall be developed to control Nuclear Assurance site surveillance activities. Site surveillance shall be used to observe and verify that quality-related activities are accomplished in accordance with prescribed procedures.
- 5.9 A surveillance schedule shall be developed to ensure adequate coverage of quality-related activities.
  - 5.9.1 The frequency of site surveillance is based upon the complexity of the activity, importance of the activity, and magnitude of discrepancies noted during previous audits or surveillance.
  - 5.9.2 Unscheduled site surveillance may be performed to accommodate changes in plant conditions or systems.
- 5.10 Scheduled site surveillance are performed using a surveillance checklist. The surveillance checklist shall be prepared using applicable procedures, specifications, codes, and regulatory requirements for source requirements.
- 5.11 Site surveillance results are documented, and a summary of surveillance and evaluation of surveillance findings shall be prepared and transmitted to responsible management.
- 5.12 Nonconforming equipment, components, parts, materials, activities or documentation identified during an audit or site surveillance shall be documented in accordance with Reference 4.4.
- 5.13 Personnel performing surveillance shall be trained and qualified in accordance with Reference 4.2.

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# 5.0 DOCUMENTATION

6.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.5.

# 7.0 ATTACHMENTS

7.1 None

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#### 1.0 PURPOSE

1.1 The purpose of this chapter is to describe the requirements and responsibilities for the design, procurement, control and physical accounting of nuclear fuel for the South Texas Project Electric Generating Station (STPEGS).

#### 2.0 SCOPE

2.1 This chapter describes the fabricated nuclear fuel activities within the scope of the Operations Quality Assurance Plan (OQAP).

#### 3.0 DEFINITIONS

3.1 None

#### 4.0 <u>REFERENCES</u>

- 4.1 OQAP Chapter 6.0, Design and Modification Control
- 4.2 OQAP Chapter 7.0, Procurement
- 4.3 OQAP Chapter 9.0, Control of Material
- 4.4 OQAP Chapter 13.0, Deficiency Control
- 4.5 OQAP Chapter 14.0, Records Control
- 4.6 OQAP Chapter 15.0, Quality Assurance Audit and Surveillance

# 5.0 <u>RESPONSIBILITIES</u>

5.1 The Vice President, Nuclear Generation is responsible for the core operations within core performance guidelines and safety analyses.

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- 5.2 The Vice President, Nuclear Engineering is responsible for assuring that nuclear fuel management activities, which include technical support for fuel procurement, receipt and receipt inspection, onsite storage, handling, physical accountability and monitoring of nuclear fuel assemblies, fuel design and analyses, reactor core performance guidelines and safety analyses in support of core operations, special nuclear materials status report preparation, the preparation of spent fuel for shipment, and licensing new and reload fuel with the Nuclear Regulatory Commission, are conducted in accordance with this chapter.
- 5.3 The General Manager, Nuclear Assurance and Licensing is responsible for providing quality assurance support for fuel procurement, receipt and installation of fuel assemblies and verification that requirements are being implemented thorough quality assurance surveillance and audits.
- 6.0 <u>REQUIREMENTS</u>
  - 6.1 Application of quality assurance requirements to nuclear fuel management activities shall be accomplished in accordance with approved procedures that implement the following elements of the Operations Quality Assurance Plan.

6.1.1 Deficiency Control

- 6.1.1.1 Nonconforming items related to the receipt of nuclear fuel assemblies shall be documented and controlled in accordance with Reference 4.4.
- 6.1.2 Auditing and Surveillance Activities
  - 6.1.2.1 The activities identified in this chapter shall be audited in accordance with the Reference 4.6.
- 6.1.3 Collection, Storage, and Maintenance of Quality Assurance Records
  - 6.1.3.1 The appropriate quality assurance records applicable to nuclear fuel shall be identified, administered, and stored in accordance with the applicable requirements of Reference 4.5.

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- 6.1.4 Control of Modification and Design Activities
  - 6.1.4.1 Fuel and core design and design verification activities shall be accomplished in accordance with the applicable requirements described in Reference 4.1.
- 6.1.5 Procurement Control
  - 6.1.5.1 Procurement activities related to fabricated nuclear fuel assemblies shall be accomplished in accordance with the requirements of Reference 4.2.
- 6.1.6 Material Control
  - 6.1.6.1 The handling and storage of nuclear fuel assemblies and associated equipment received at the STPEGS shall be performed in accordance with the applicable requirements of Reference 4.3. Technical assistance, including necessary instructions for handling, preservation, storage and other special controls, shall be provided by the supplier of nuclear fuel assemblies in accordance with the fuel contract.
- 6.2 Engineering Support Activities
  - 6.2.1 The following fuel management activities shall be accomplished in accordance with approved procedures which provide the necessary interface controls:
    - 6.2.1.1 Fuel Design and Analysis
    - 6.2.1.2 Core-related Safety and Transient Analysis
    - 6.2.1.3 Fuel Performance Analysis

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# 7.0 DOCUMENTATION

7.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.5.

#### 8.0 ATTACHMENTS

8.1 None

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ASME CODE SECTION XI - REPAIRS AND REPLACEMENTS	EFFECTIVE DATE 12/30/94	

#### 1.0 PURPOSE

1.1 The purpose of this chapter is to prescribe requirements and responsibilities for repair and replacement activities governed by ASME Boiler and Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components.

#### 2.0 SCOPE

2.1 This chapter is applicable to examination, repair and replacement activities performed on ASME Class 1, 2, and 3 components.

#### 3.0 DEFINITIONS

3.1 None

#### 4.0 REFERENCES

- 4.1 ASME Code Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components
- 4.2 OQAP Chapter 14.0, Records Control
- 4.3 Generic Letter 89-009, ASME Section III Component Replacements

#### 5.0 <u>RESPONSIBILITIES</u>

- 5.1 The Vice President, Nuclear Generation is responsible for the planning, management, and control of the performance of repairs, replacements and tests.
- 5.2 The Vice President, Nuclear Engineering is responsible for developing the repair and replacement program including specifications for design, fabrication, testing, and examination.
- 5.3 The General Manager, Nuclear Assurance and Licensing is responsible for providing qualified personnel to perform examinations of component repairs and replacements and verifying the requirements of this chapter are implemented.

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# 6.0 REQUIREMENTS

6.1	Repair Referen written	and replacement activities required by ce 4.1 shall be conducted in accordance with and approved procedures or instructions.
	Areas t	o be addressed include:
	6.1.1	Accessibility for component examination, repair or replacement.
	6.1.2	Identificaton of system boundaries and code class for each component.
	6.1.3	The method for interfacing with the authorized nuclear inspection agency.
	6.1.4	Qualification of nondestructive examination methods.
	6.1.5	Qualification requirements for nondestructive examination personnel.
	6.1.6	Qualification requirements for welders and welding operators.
	6.1.7	Qualification of welding procedures.
	6.1.8	Conduct of examinations and inspections.
	6.1.9	A component repair or replacement package including installation and test procedures and quality assurance requirements.
	6.1.10	Conduct of system pressure and functional tests.
	6.1.11	A component replacement package including specifications for design, fabrication and examination as applicable for the replacements.
	6.1.12	Preparation, submittal and retention of required records and reports.
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.1.13 Procurement, in accordance with Reference 4.3, of component replacements not available in full compliance with ASME code stamping and documentation requirements.

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# 7.0 DOCUMENTATION

7.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.2.

# 8.0 ATTACHMENTS

8.1 None

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ASME CODE SECTION XI - INSERVICE INSPECTION AND TESTING	EFFECTIVE DATE 12/30/94	

#### 1.0 <u>PURPOSE</u>

1.1 The purpose of this chapter is to prescribe requirements and responsibilities for the inservice examination and testing programs at the South Texas Project Electric Generating Station (STPEGS).

#### 2.0 SCOPE

2.1 This chapter applies to the inservice examination and testing of Class 1, 2 and 3 pressure retaining components and component supports as specified in Section XI of the ASME Boiler and Pressure Vessel Code and additional ISI commitments as specified in the UFSAR.

#### 3.0 DEFINITIONS

3.1 None

#### 4.0 <u>REFERENCES</u>

- 4.1 ASME Code Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components
- 4.2 10CFR50.55a, Codes and Standards
- 4.3 OQAP Chapter 4.0, Qualification, Training and Certification of Personnel
- 4.4 OQAP Chapter 14.0, Records Control

# 5.0 <u>RESPONSIBILITIES</u>

- 5.1 The Vice President, Nuclear Engineering is responsible for developing and implementing the inservice examination and testing programs as required by ASME Code Section XI.
- 5.2 The General Manager, Nuclear Assurance and Licensing is responsible for verifying the implementation of the inservice examination and testing programs through audits and surveillances, interfacing with the Authorized Inspection Agency, and performance of nondestructive examinations as requested by Nuclear Engineering.

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#### 6.0 <u>REOUIREMENTS</u>

- 6.1 The inservice examination and testing programs consist of plans and implementing procedures for the examination and testing of Class 1, 2, and 3 pressure retaining components and their supports and the inservice testing of Class 1, 2, and 3 pumps and valves.
  - 6.1.1 Examination and Testing of Pressure Retaining Components and Component Supports
    - 6.1.1.1 Nuclear Engineering shall develop plans for examination and testing of Class 1, 2, and 3 components and their supports. These plans shall prescribe the requirements for nondestructive examinations and tests and the schedule for their performance.
    - 6.1.1.2 Inspection plans (e.g., specifications, vendor documents, etc.) shall be developed which identify the nature and extent of examination and testing activities including the acceptance criteria which must be met.
    - 6.1.1.3 Procedures shall be developed which provide measures for the performance of activities identified in the plans.
  - 6.1.2 Inservice Testing of Pumps and Valves and System Pressure Testing
    - 6.1.2.1 Nuclear Engineering shall develop the Inservice Testing Program for pumps and valves and the System Pressure Testing Program. These programs shall include the requirements and the schedule for their performance.
  - 6.1.3 Examination and test results shall be evaluated by specified personnel and verified by the Authorized Nuclear Inservice Inspector.

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- 6.1.4 Coordination of involved HL&P departments, including the use of contractors for the performance, documentation and evaluation of inservice inspection activities, shall be controlled by approved procedures.
- 6.1.5 When contractors are used to perform activities within the scope of this section, their quality assurance program shall be approved by HL&P Nuclear Assurance.
- 6.1.6 Exceptions to code examination and testing requirements shall be documented in accordance with Reference 4.2.
- 6.1.7 Personnel performing examinations and tests shall be qualified as required by Reference 4.1 and Reference 4.3.
- 6.1.8 Plans and reports for inservice examinations and tests shall be submitted to the appropriate regulatory and enforcement authorities as required by Section XI.

#### 7.0 DOCUMENTATION

- 7.1 Procedures which are generated as required by this chapter shall identify the records which are required to implement and document those activities. The records shall be controlled in accordance with Reference 4.4.
- 8.0 ATTACHMENTS

8.1 None