



# THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

ILLUMINATING BLDG. • PUBLIC SQUARE • CLEVELAND, OHIO 44101 • TELEPHONE (216) 622-1350 • MAIL ADDRESS: P.O. BOX 5000

*Serving The Best Location in the Nation*

Dalwyn R. Davidson  
VICE PRESIDENT - ENGINEERING

May 1, 1978

Mr. James G. Keppler, Director  
U.S. Nuclear Regulatory Commission  
Region III Office of Inspection  
and Enforcement  
799 Roosevelt Road  
Glen Ellyn, Illinois 600137

Dear Mr. Keppler:

This letter is our response to your Immediate Action Letter of February 8, 1978. The Immediate Action Letter addressed eight areas of concern. The first five items have been resolved with the members of your staff, as a result of inspections on site and review of the actions taken on our part. In order that this letter be complete, I have attached as Appendix 1 a brief summary of the first five items and resolution status.

With respect to Items 6, 7 and 8 of your letter, a thorough review was undertaken both internally and with the use of an outside auditing team, in order for us to address these concerns.

Item 6 of the February 8, 1978 Immediate Action Letter in part identifies the need to establish an effective contract specifications control system. In response to this concern, the system was reviewed including auditing of all project and safety-related contractors files.

In the audit of the existing files deficiencies which were found, have been corrected and all files updated including control copies. The "Specifications" include attachment Specifications, Engineering Change Notices, and Field Variance Authorizations.

The system was then reviewed and several modifications were made. In general these consisted of the following:

- A. The system now utilizes a control number distribution with return receipts required. All distribution responsibilities are now at the Site Document Control Center.
- B. The specifications status system is in part monitored on a computerized/terminal system identified as NEWSPEC. Field Variance Authorizations are presently monitored manually. A maintenance system was established which centralizes the responsibility for inputting of all new or change information through the Site Document Control Center. The

May 1, 1978

system provides for continuous monitoring of specification status, however, periodically, at a minimum quarterly, a status review will be conducted as spelled out in a project procedure. In addition, audits by Site Quality Assurance will be performed to verify correctness.

- C. The project and contractor files were updated including elimination of xerox copies.
- D. Procedures were developed to define the system and spell out the mechanics to operate it. In addition, instructions have been developed for personnel operating the system.
- E. All project and construction personnel received training and indoctrination presentations. Included were the familiarization with the procedures and scoping of responsibilities.

With the implementation of the above we consider we have in place an effective system for assuring the timely and controlled distribution of specifications. All safety-related construction contracts are included and non-safety and equipment contracts will follow.

An evaluation was performed to determine the acceptability of the concrete batched by National Mobile Company to a superseded design specification during the time period from August 5, 1977 to February, 1978. The result of this evaluation by the cognizant design engineer concluded that the concrete produced to revision VI of SP-14-4549-0000 will satisfy the design requirements. Each of the 31 modifications that were made in revision VII of SP-14-4549-0000, were evaluated. These modifications were in the following general areas:

- 1. Expansion and clarification to remove redundancies and resolve conflicts.
- 2. Modification of certain procedural changes that do not affect quality.
- 3. Modification of certain requirements to facilitate field conditions without sacrificing quality.

Most of these modifications incorporated into revision VII had been previously issued as ECN's applicable to revision VI. It is our opinion and that of the responsible design engineer, that production of quality concrete at the Perry Plant was not affected by any revision of the specification being held by the batch plant contractor.

May 1, 1978

Item 7A. An evaluation of the indoctrination and training program was made. It was concluded that the program needs improvement. Accordingly CEI will restructure the indoctrination and training program to include a uniform approach to indoctrination and training for various organizations, including contractors. Outlines will be completed by mid-May and the schedule for implementing training sessions will be completed by the third week of May. Regular indoctrination sessions will be started during May and will continue on a regular basis as defined in the indoctrination and training outline.

Item 7B. During our evaluation it was determined that the nonconformance reporting system as implemented on the site, is an effective system. There have been occasions however where documents other than nonconformance reports have been used to note problem areas. Effective immediately, a policy statement has been issued that only nonconformance reports will be utilized in defining nonconforming conditions.

Item 8. To evaluate our program effectiveness, a special Quality Assurance Task Force was established consisting of representatives from Gilbert Associates, Inc., Kaiser Engineers, CEI and an independent QA consultant Mr. J. P. Jackson of Management Analysis Company. The Special QA Task Force has performed a thorough evaluation including on-site and off-site audits.

This Task Force issued an Interim and a Final Report evaluating the overall effectiveness of our program. The methodology of the Task Force was to conduct indepth interviews with all key project personnel plus audit selected contractors and site elements (CQA, CQC and PCMO), and the home office departments (NED, Purchasing, and NQAD).

The Task Force then evaluated the results of these audits and interviews with respect to the effectiveness of the program. This translated into specific findings relative to the appropriate 10CFR50, Appendix B criteria and the PNPP PSAR Chapter 17 commitments.

Recommendations were provided and a plan has been established based on these findings in order of priority which addressed relative significance to the action necessary to improve our program effectiveness. The priorities themselves were based on:

- a. Those items which were critical to the overall corrective action program and required top management priority,
- b. Those actions which were required for QA program implementation,
- c. Those actions required for improvement to the QA program.

The following conditions were identified as a result of our evaluations as those that have contributed to the causes of the items identified as Items 1 through 6 in the Immediate Action Letter.

May 1, 1978

- A. The CEI QA Program is defined in many different manuals. There is no single manual that defines critical controls necessary to implement the QA program on a corporate basis. This lack of definition as to who is responsible has resulted in confusion as to primary responsibility in implementing the program.
- B. The techniques for resolution of conflicts has not provided timely response to noted problem areas. Additionally, the degree of management involved in resolving problem areas within the CEI QA program has not been commensurate with the need for resolution of QA program issues.
- C. The reorganization of 1977 which merged the Site QA/QC activities, created voids in certain areas of the QA program which should have included redefinition of responsibilities, particularly in the area of surveillance/inspection and audits.
- D. Each contractor is held totally responsible for total QA program, without consideration for the integration of CEI QA/QC functions with those of those contractors.

Commensurate with the priority of the recommendations CEI has accomplished those items which were identified as critical to the overall corrective action program and required top management priority. The following summarizes the changes initiated and completed.

- Item 1 -- The QA/QC organization at the site has been reorganized to unify it under the direction of a General Supervising Engineer. In addition the assignments have been revised so as to provide a single responsible quality engineer for each contractor.
- Item 2 -- The Site Quality Manuals are in the process of being consolidated reflecting the redefined responsibilities and procedures of the site QA/QC organization.
- Item 3 -- A QA Advisory Committee has been established to assist the CEI Nuclear Quality Assurance Department Manager with inputs and recommendations to key program decisions, orientation of QA concepts and methods as well as accessing overall corporate support by CEI/GAI/KEI to the direction taken by the Nuclear Quality Assurance Department Manager.

This committee will be comprised of Mr. M. R. Edelman, Manager of the Nuclear Quality Assurance Department, Mr. N. R. Barker, Manager of Construction QA at Gilbert Associates, Mr. E. V. Knox, Corporate QA Manager of Kaiser Engineers.

May 1, 1978

- Item 4 -- The Nuclear Quality Assurance Department Manager has established a plan which provides a schedule for completing modification to the QA program. Weekly meetings have been scheduled to track and report progress to upper management.

Additionally, the Nuclear Quality Assurance Department Manager has established a program of quarterly reviews to CEI top management to incorporate the inputs from the Advisory Committee, as well as, review the QA program through evaluation of audits, corrective action reports and other management tools.

- Item 5 -- The Nuclear Quality Assurance Department has been reorganized to reflect the findings and recommendations of the Audit Task Force. Attachment 2 depicts the revised organization and lists the primary responsibilities of the key individuals involved.
- Item 6 -- CEI has established a schedule for the restructuring of the audit program, both at the Site, our contractors and our QA agents.
- Item 7 -- CEI has established and has started the implementation at the Site of an integrated inspection/surveillance program. The program includes witness points tied to contractors inspection planning documents and includes in-process surveillance inspections, as well as, surveillance inspection of completed work. The surveillance inspection planning will be approved by a responsible Quality Engineer. Complete implementation is anticipated by mid-June.
- Item 8 -- The receiving inspection program has been expanded beyond a count and damage check and is now based on input of quality engineering to determine on a case by case basis the necessary inspection required. Implementation has been started with complete implementation anticipated by mid-June.
- Item 9 -- The NQAD Manager will use the formal management chains to resolve conflicts, with the corporate QA program clearly endorsing his authority to resolve quality issues. The corporate quality assurance management committee has been redefined as a communication vehicle.



May 1, 1978

In addition, actions that were identified by the Task Force and deemed necessary, but not yet completed, are as follows:

1. CEI has strengthened our quality assurance program, by completing the items described previously. In addition we purpose to reissue our Corporate Quality Assurance Manual to reflect these improvements as well as clearly define the interfaces between all departments performing quality related functions. This manual will reiterate the strong CEI commitment to the QA program indicating that the manual must be followed by all persons involved with respect to the Perry Project, and that changes will be considered and processed immediately if the situation warrants. The manual will clearly provide guidance on how CEI will address with Regulatory Guides identified in the PSAR. Scheduled completion date for issuance of this manual is August, 1978.
2. CEI will evaluate the effectiveness and expertise of presently available in-house personnel, consistent with the revised departmental organization. CEI will employ experienced quality assurance personnel in the key supervisory roles as defined on the revised organization chart as shown in Attachment 2 of this letter. This evaluation will be completed by June 1. CEI will continue to draw upon Gilbert Associates and Kaiser personnel for support as deemed necessary by the Nuclear QA Department Manager.
3. CEI will restructure the audit program and coordinate the audit review reports from all elements. The audit program will cover all aspects of the program including agents, design activities, construction activities as well as internal CEI activities. This revised audit program will serve as the backbone for the Nuclear Quality Assurance Department Manager as a tool to assess the effectiveness of our overall QA program. This is anticipated to be implemented by June 1.
4. CEI will provide direct support to selected contractors in the QA/QC area where it is determined by the responsible quality engineer that such support is needed. This will prevent demands on contractors to establish QA programs that are beyond their capabilities to implement effectively. This will be implemented on as needed basis.
5. Additional detailed recommendations for improvement in the CEI QA Program based on the Special QA Task Force have been reviewed and will be included as appropriate in the revised QA Manual. These are anticipated to be completed by August 1, 1978.

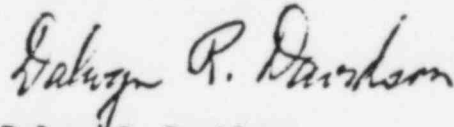
Mr. James G. Keppler

- 7 -

May 1, 1978

In summary the three month assessment made of our program by the outside auditing team plus our own evaluations as to our effectiveness have provided beneficial input to all parties involved. Significant improvements have been made and will continue to be made to make our program overall more effective. I will provide close attention to the development of the revised QA Manual and review the effectiveness of our overall quality assurance program. With the commitments that we have made and, the changes that have been implemented, we feel that our quality assurance program will provide a effective means of controlling quality on the Perry Project to insure the plant is built to applicable standards and designs.

Very truly yours,

A handwritten signature in cursive script that reads "Dalwyn R. Davidson".

Dalwyn R. Davidson  
Vice President - Engineering

DRD:ge  
Attachments

ATTACHMENT 1

SUMMARY OF ACTION TAKEN ON IMMEDIATE ACTION LETTER ITEMS 1-5

BACKGROUND

Based on concerns noted in Items 1-5 of the NRC Immediate Action Letter of February 8, 1978, numerous actions have been taken and these actions have received concurrence during various NRC inspections. The following is provided as a summary of these activities. NRC letter of March 31, 1978 Inspection Report No. 50-440/78-03, 50-441/78-02 provide additional detail and NRC evaluation on these actions.



Item 1 and 2. Safety-Related Piping Fabrication and Installation

Deficiencies noted by the NRC, prompted CEI QA Elements to stop work on Pullman Power Products in the areas of safety-related pipe fabrication, yard piping installation, and plant piping. Several modifications to the specifications and the quality program requirements were initiated by CEI, GAI, and PPP. These measures included Pullman initiating procedures for "Document Control" and "Design Control" which were submitted to and approved by the CQA Element. Pullman fabrication and erection drawings have been submitted to GAI Design Engineer for review and approval in accordance with these procedures. Gilbert Engineering has issued an ECN to SP-44 which establishes the requirements for the Design Engineer's review of contractor's piping drawings. This area has been monitored by CQA to assure that these requirements are being met.

Pullman has implemented a procedure for "Field Handling of Materials and Equipment" which was approved by the CQA Element. CQA has witnessed Indoctrination and Training classes conducted by Pullman on QA Program Requirements. These classes were documented and are to continue on a regular basis. Pullman has since employed a training officer on site to conduct these classes.

One hundred percent surveillance inspection was implemented by the GAI Resident Inspector at Pullman's Williamsport, Pennsylvania shop. On March 16, 1978, Mr. R. L. Spessard of NRC Region III approved the use of a sampling plan per MSP-033, Rev. 3, and CEI letter dated March 9, 1978.

CEI letter dated February 18, 1978 established the requirement for the GAI Design Engineer to:

1. Review 100% safety Class I spool drawings.
2. Sampling per MSP-033, Para. C.3d applied to spool drawings only for safety Class II and III.

Subsequent NRC review of these corrective action measures resulted in the release of Pullman Power Products for safety-related work.

Item 3. PBI Industries Safety-Related Structural Steel and Embedments

The installation procedural controls on safety-related embedments and structural steel have been modified to assure compliance to AWS D.1.1-1972 prior to placement. The CQC element has superimposed an inspection program of 100% verification of the vendor's and our manufacturing assurance inspection programs.

These additional inspection measures include 100% receiving inspection of all new embedments and structural steel delivered to the site, 100% inspection of all embedments and structural steel currently in inventory prior to their issuance to contractors, and for those items previously issued, 100% inspection of all embedments and structural steel prior to their placement.

These currently established measures have been reviewed and found acceptable by NRC inspectors as indicated in the March 31, 1978 report (50-440/78-03, 50-441/78-02).

To establish compliance at the vendor's facilities the CEI vendor assurance program has been increased to include 100% surveillance of all embedments and structural steel being fabricated. Finally, the vendor's inspection program has been altered to include the additional detailed acceptance criteria provided by the Design Engineer.

When PBI and its subsidiaries are released to resume shipments, and all existing inventory has been inspected, an evaluation shall be performed to determine the future procedural controls for assuring compliance to AWS D.1.1-1972. This evaluation and recommended course of action shall be discussed with the NRC prior to being implemented.

Item 4. O. B. Cannon Nuclear Coatings

As a result of the deficiencies noted by the NRC, CQA issued a Stop Work Notice and Corrective Action Request (CAR) to O. B. Cannon. The CAR identified five deficient conditions in their QA program and implementing procedures in the areas of verification of materials prior to use, qualifications of personnel, and performance of audits.

The contractor's response to the Corrective Action Request included:

(1) the correction of coating applicators' qualification records in accordance with O. B. Cannon procedures; (2) the inspection status tagging of all cans and cartons of coating materials in the storage area; (3) the missing physical examination record was returned to O. B. Cannon's site QC file; (4) the O. B. Cannon QC manual was revised to include the review and approval of manufacturers' material certification; and (5) the contractor's first internal project audit was performed.

The contractor's implementation of these corrective actions was verified by CQA and a partial stop work release for Class II coating work (non-safety related) was issued.

Then February 18, 1978, the NRC reviewed O. B. Cannon's QA program and procedural improvements and observed the corrective actions taken. As a result of this review and observation, the NRC inspector concluded that safety-related coating work could be permitted to resume. Subsequently, a full stop work release was approved and issued by CQA.

Item 5. Safety-Related Concrete Placement

Prior to resuming safety-related concrete placement by each of our four placement contractors, several QA program adjustments were made. These changes included a new slump testing procedure which requires, upon detection the high/low slump, the suspension of placement and the sampling of each truck until slump is back within specified limits. An indoctrination and training meeting was held with contractor's vibrator operators and a procedural requirement was added to rebrief and provide attestation of vibration operator training prior to each placement. The CQC detailed procedures and inspection plans were revised to reflect implementation of 100% CQC inspection of contractor preplacement inspection activities. CQA performed detailed program audits of each contractor and CEI management met with contractor management to emphasize their contractual obligations with respect to quality control.

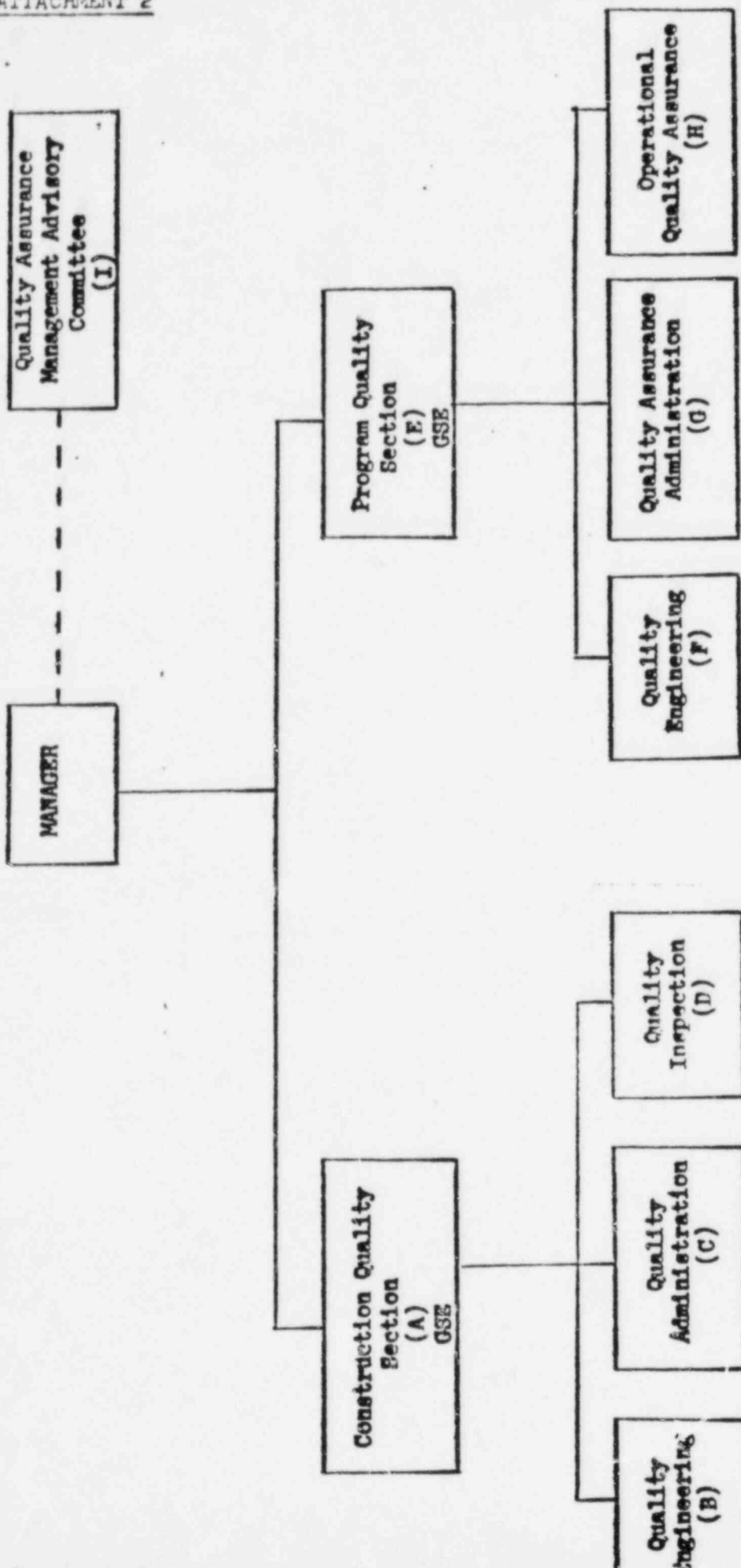
Upon completion of these activities, and the review and inspection of preplacements by NRC inspectors, contractors were individually released to place safety-related concrete. Then, in addition to continued 100% CQC inspection, CQA performed audits of preplacement and placement activities by both the contractor and CQC on all safety-related pours.

A subsequent CQA evaluation of these audits was reviewed by and agreed to by the NRC on April 14, 1978 and the CQA audit frequency on two of the contractors (National Engineering and Great Lakes) was reduced to one audit per week.

As of this response date, the other two contractors (S & M and DICK Corporation) shall continue under the CQA audit of every placement program until several pours can be made by each organization and a level of confidence is established.

NUCLEAR QUALITY ASSURANCE DEPARTMENT

ATTACHMENT 2



ATTACHMENT 2

ORGANIZATIONAL RESPONSIBILITIES

(A) Construction Quality Section - GSE

1. Coordinate all site quality functions
2. Primary contact Nuclear Regulatory Commission inspections
3. Responsible for all line supervisory functions

(B) Quality Engineering (Construction Quality Section)

1. Contractor quality assurance programs
2. Establishing inspection requirements
3. Coordination and disposition of nonconformance reports
4. Obtain correction action
5. Contractor; procedure review
6. Receiving inspection plan
7. Audit contractors/Site Organization
8. Review procurement documents
9. Analysis and reports trends
10. Establish site quality assurance records requirements
11. Coordinator off site quality information requests

(C) Quality Administration (Construction Quality Section)

1. Audit tracking
2. Indoctrination and training
3. Quality manual control
4. Quality assurance records
5. Nonconformance Report control

(D) Inspection (Construction Quality Section)

1. Surveillance inspection
2. Receipt inspections
3. Documentation of inspections
4. Prepare Nonconformance Reports

(E) Program Quality Section - GSE

1. Coordinate all design, procurement, manufacturing activities
2. Responsible for agents quality assurance efforts, inc. Primarily GAI/QA Program
3. Responsible for all line supervisory functions



(F) Quality Engineering (Program Quality Section)

1. Review of contracts
2. Vendor preaward meetings
3. Support audit program
4. Quality engineering support to Nuclear Engineering Department
5. Quality engineering support to Purchasing
6. Safety Analysis Report reviews

(G) Quality Assurance Administration (Program Quality Section)

1. Audits
2. Indoctrination and training
3. Procedures
4. Records
5. Scheduling and expediting

(H) Operational Quality Assurance (Program Quality Section)

1. Operations quality assurance program planning
2. Startup and Test quality assurance support

(I) Quality Assurance Advisory Committee

1. Input on quality assurance program policy
2. Input on quality assurance methods and techniques
3. Quality assurance management for GAI/KEI support

#### 1.4 Management Review and Evaluation

Overall assessment of the scope, implementation and adequacy of the Quality Assurance Program shall be made by the QA Advisory Committee. This committee consists of the CEI Nuclear QA Department Manager as chairman with QA management representatives from Kaiser Engineers, Gilbert Associates, and other agents, as approved by the chairman. This committee is chartered to perform quarterly reviews of the program and to report the results through the QA Department Manager, to top CEI management through corporate reporting channels. These reviews shall be documented and shall incorporate the input provided by:

- a. The personal assessments of QA agent representatives on the committee.
- b. Audit trend analysis provided by PQS Quality Administration.
- c. Nonconformance trend analysis provided by CQS Quality Engineering.
- d. Corrective Action Request evaluations provided by PQS and CQS General Supervising Engineers.
- e. Evaluations provided by outside audit groups or QA Task Forces which may be organized by the QA Advisory Committee to provide specialized input.
- f. Conventional management appraisal and analysis techniques.

#### 1.5 Resolution of Program Impasses

Disputes arising from the interpretation of the Nuclear Quality Assurance Program shall be resolved at the lowest possible level.

The hierarchy of each project department provides for ~~equal~~ interfaces from department specialists through various levels of supervision. This organizational consistency should provide ample opportunities for problem resolution through simple escalation.

Those conflicts which cannot be resolved at lower levels shall be referred to the NQA Department Manager. The Nuclear QA Department Manager shall attempt to resolve the problem with the Manager of the other concerned department, or, ~~if necessary~~, escalate to the executive level, using the advice of his QA Advisory Committee as appropriate.

#### 1.6 Indoctrination and Training

Procedures shall be established to assure that personnel performing quality related activities are suitably trained and qualified to perform their work. Each project Department is responsible for organizing, implementing, and documenting appropriate training measures necessary for their project functions. Procedures and Records ~~review and approval~~ of training procedures, *Through its Review Process*

54-440

2

#### 1.4 Management Review and Evaluation

Overall assessment of the scope, implementation and adequacy of the Quality Assurance Program shall be made by the QA Advisory Committee. This committee consists of the CEI Nuclear QA Department Manager as chairman with QA management representatives from Kaiser Engineers, Gilbert Associates, and other agents, as approved by the chairman. This committee is chartered to perform quarterly reviews of the program and to report the results through the QA Department Manager, to top CEI management through corporate reporting channels. These reviews shall be documented and shall incorporate the input provided by:

- a. The personal assessments of QA agent representatives on the committee.
- b. Audit trend analysis provided by PQS Quality Administration.
- c. Nonconformance trend analysis provided by CQS Quality Engineering.
- d. Corrective Action Request evaluations provided by PQS and CQS General Supervising Engineers.
- e. Evaluations provided by outside audit groups or QA Task Forces which may be organized by the QA Advisory Committee to provide specialized input.
- f. Conventional management appraisal and analysis techniques.

#### 1.5 Resolution of Program Impasses

Disputes arising from the interpretation of the Nuclear Quality Assurance Program shall be resolved at the lowest possible level.

The hierarchy of each project department provides for interfaces from department specialists through various levels of supervision. This organizational consistency should provide ample opportunities for problem resolution through simple escalation.

Those conflicts which cannot be resolved at lower levels shall be referred to the NQA Department Manager. The Nuclear QA Department Manager shall attempt to resolve the problem with the Manager of the other concerned department, or escalate to the executive level, using the advice of his QA Advisory Committee as appropriate.

#### 1.6 Indoctrination and Training

Procedures shall be established to assure that personnel performing quality related activities are suitably trained and qualified to perform their work. Each project Department is responsible for organizing, implementing, and documenting appropriate training measures necessary for their project functions. Procedures and Records through its review process of training

54-444

All procedures and instructions shall be approved and established, with training accomplished, prior to the start of the activities being controlled. Issuance, distribution, and revisions shall be controlled to preclude the use of obsolete documents.

Reference indexes, demonstrating the Quality Assurance program's address with respect to the guidelines provided by Quality Program Regulatory Guides and American National Standards (ANSI) are presented in Appendix I.

#### 1.4 Management Review and Evaluation

Overall assessment of the scope, implementation and adequacy of the Quality Assurance Program shall be made by the QA Advisory Committee. This committee consists of the Manager, NQAD, as chairman with QA management representatives from Kaiser Engineers, Gilbert Associates, and other agents, as approved by the chairman. This committee is chartered to perform quarterly reviews of the program and to report the results through the Manager, NQAD, to top CEI management through corporate reporting channels. These reviews shall be documented and shall incorporate the input provided by:

- a. The personal assessments of QA agent representatives on the committee.
- b. Audit trend analysis provided by the Program Quality Section (PQS) Quality Administration.
- c. Nonconformance trend analysis provided by the Construction Quality Section (CQS) Quality Engineering.
- d. Corrective Action Request evaluations provided by the General Supervising Engineers, PQS and CQS.
- e. Evaluations provided by outside audit groups or QA Task Forces which may be organized by the QA Advisory Committee to provide specialized input.
- f. Conventional management appraisal and analysis techniques.

#### 1.5 Resolution of Program Impasses

Disputes arising from the interpretation of the Nuclear Quality Assurance Program shall be resolved at the lowest possible level.

The hierarchy of each project department provides for interfaces from department specialists through various levels of supervision. This organizational consistency should provide ample opportunities for problem resolution through sample escalation.

Those conflicts which cannot be resolved at lower levels shall be referred to the Manager, NQAD. The Manager, NQAD shall attempt to resolve the problem with the Manager of the other concerned department, or escalate to the executive level, using the advice of the QA Advisory Committee as appropriate.

References

are addressed in detail in the eighteen sections which comprise this Manual. The requirements of this program shall be implemented in accordance with detailed procedure and instruction manuals.

All procedures and instructions shall be approved and established, with training accomplished, prior to the start of the activities being controlled. Issuance, distribution, and revisions shall be controlled to preclude the use of obsolete documents.

~~Reference indexes demonstrating the Quality Assurance Program's address with respect to the guidelines provided by Quality Program Regulatory Guides and American National Standards (ANSI) are presented in Appendix~~

1.4 MANAGEMENT REVIEW AND EVALUATION

Overall assessment of the scope, implementation and adequacy of the Quality Assurance Program shall be made by the QA Advisory Committee. This committee consists of the Manager, NQAD, as chairman, the Managers, Nuclear Engineering and Perry Plant Departments; with QA management representatives from Kaiser Engineers, Gilbert Associates, and other agents, as approved by the chairman. This committee is chartered to perform quarterly reviews of the program and to report the results through the Manager, NQAD, to top CEI management through corporate reporting channels. These reviews shall be documented and shall incorporate the input provided by:

- a. The personal assessments of QA agent representatives on the committee.
- b. Audit trend analysis provided by the Program Quality Section (PQS) and Training/Administration Section.
- c. Nonconformance trend analysis provided by the Construction Quality Section (CQS), Training/Administration Section and Program Quality Section.
- d. Corrective Action Request evaluations provided by the General Supervising Engineers, PQS and CQS.
- e. Evaluations provided by outside audit groups or QA Task Forces which may be organized by the QA Advisory Committee to provide specialized input.
- f. Conventional management appraisal and analysis techniques.

1.5 RESOLUTION OF PROGRAM IMPASSES

Disputes arising from the interpretation of the Nuclear Quality Assurance Program shall be resolved at the lowest possible level.



References

the corresponding safety-related activities are addressed in detail in the eighteen sections which comprise this Manual. The requirements of this program shall be implemented in accordance with detailed procedure and instruction manuals.

All procedures and instructions shall be approved and established, with training accomplished, prior to the start of the activities being controlled. Issuance, distribution, and revisions shall be controlled to preclude the use of obsolete documents.

Reference indexes demonstrating the Corporate Nuclear Quality Assurance Program's address with respect to the guidelines provided by Regulatory Guides and American National Standards Institute (ANSI) are presented in Appendix I.

1.4 MANAGEMENT ASSESSMENT

Management assessment of program effectiveness shall be through regular and documented reporting channels on a month by month basis, and through a Quality Assurance Quarterly Evaluation.

In addition, a Quality Assurance Advisory Committee (QAAC) has been established as an independent group to conduct regular review and evaluation of the QA Program for the Perry Nuclear Power Plant (PNPP). The committee shall advise the Vice President - System Engineering and Construction on the adequacy of scope, implementation and effectiveness of the PNPP QA Program, and on CEI QA policy matters as they relate to PNPP.

The QAAC shall have an approved charter addressing frequency, membership, and responsibilities.

1.5 RESOLUTION OF PROGRAM IMPASSES

Disputes arising from the interpretation of the Corporate Nuclear Quality Assurance Program shall be resolved at the lowest possible level.

The hierarchy of each project department provides for interfaces from department specialists through various levels of supervision. This organizational consistency should provide ample opportunities for problem resolution through simple escalation.

Those conflicts which cannot be resolved at lower levels shall be referred to the Manager, NQAD. The Manager, NQAD shall attempt to resolve the problem with the manager of the other concerned department, or escalate to the executive level, using the advice of the QA Advisory Committee as appropriate.