

Yellow

SEP 23 1983

Mississippi Power and Light Company  
ATTN: Mr. J. B. Richard  
Senior Vice President, Nuclear  
P. O. Box 1640  
Jackson, MS 39205

Gentlemen:

SUBJECT: GRAND GULF NUCLEAR STATION QA PROGRAM UPDATE

Your letter of June 10, 1983, provided the current description of your quality assurance program required by 10 CFR 50.54(a). We have reviewed your submittal and have determined that additional information is needed to complete our evaluation of changes to the program.

Our request for additional information is enclosed. Please contact Mr. Charles M. Upright of this office on (404) 221-5538 if you have any questions regarding our request.

Sincerely,

R. C. Lewis, Director  
Division of Project and  
Resident Programs

Enclosure:  
Request for Additional  
Information

cc w/encl:  
J. F. Fager, Vice President  
Engineering and Construction  
Middle South Services, Inc.  
C. K. McCoy, Plant Manager

bcc w/encl:  
C. Upright  
A. Belisle  
W. Haass, IE/QUAB

RII  
686  
GABelisle:ls  
09/21/83

RII  
CMUpright  
09/21/83

RII  
ARHerdt  
09/21/83

RII  
JAOshinski  
09/21/83

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RCLewis  
09/22/83

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Q001

ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION

GRAND GULF 50.54 SUBMITTAL DATED JUNE 10, 1983

1. 1.3.1 States that the Senior Vice President, Nuclear provides guidance  
(3) and corporate quality assurance policies, goals, and objectives to the Manager of Quality Assurance. 1.3.3 (5) states that the Manager of Quality Assurance is delegated the overall authority... This includes the establishment of corporate quality assurance policies...

These two statements appear conflicting. Define specifically who establishes corporate quality assurance policies.

2. 2.5 (2nd paragraph) The following sentence was added to this  
(23) paragraph: The applicable policies of the Operational Quality Assurance Program are mandatory for safety-related activities and functions as described in this Manual.

Define what policies apply to those systems that are important to safety (systems mentioned in 10 CFR 50 Appendix A).

3. 3.4.2 The following sentences were added to this paragraph: The  
(32) processing and reviewing of 10 CFR 50.59 changes are completed as required by the Technical Specifications. This is described in appropriate procedures.

The specific processing of 10 CFR 50.59 changes is not described in the Technical Specifications. Define specifically appropriate procedures.

4. 5.4.1 The following sentence was added to this paragraph: It is the  
(40) responsibility of the Vice President, Nuclear to ensure that those instructions, procedures and drawings that cross organizational lines internal to the Nuclear Production Department integrate and function in accordance with the above.

The position description does not include this responsibility as stated in Section 1.3.2. Verify that all functions of the Vice President are included or referenced in 1.3.2. Verify the accuracy of all other position descriptions listed in Section 1.3.

5. 6.5.8.1 The following statement was added to this paragraph: ...in a  
(46) timely manner as defined by the Quality Assurance organization.

State specifically where or how Quality Assurance defines timely manner relative to changes to procedures. This appears to decrease the previous commitment.

6. 7.5.3  
(54) The first paragraph deleted using qualified quality assurance personnel for evaluation of suppliers and now simply states that this evaluation will be done by qualified personnel.
- If quality assurance personnel are not going to perform this function, specifically define the assigned personnel and their qualifications.
7. 7.5.14  
(58) This paragraph was added. Specifically define "shall be assured in other ways".
8. 10.4.2  
(61) This paragraph states that Level III inspectors will be appointed.
- Explain who has this appointment authority and acceptance criteria for making this appointment.
9. 10.5.14  
(64) This paragraph states that inspections shall be performed, as necessary, on repetitive, routine and rework items so as to establish adequate confidence levels and maintain or reaffirm established confidence levels.
- Define adequate confidence levels.
10. 11.4.3  
(66) 11.4.3 has been deleted; consequently, 11.4.4 and 11.4.5 should be renumbered appropriately.
11. 11.5.3  
(67) 11.5.3 has been deleted; consequently, remaining paragraphs should be renumbered appropriately.
12. 11.5.4  
(68) The paragraph previously stated that testing during the initial operational period shall be sufficient to confirm the design basis. Since the plant is still "being built" although the license was issued some time ago, when it goes to power it will still be in an initial operational period.
- Deletion of this paragraph appears to degrade the previous commitment. Justify the deletion from this paragraph.
13. 12.5.8  
(70) The following sentences were added to this paragraph: A device which is found out of calibration but within the tolerance given by the TS, may be adjusted. Such actions shall be documented, but they need not be evaluated or processed as specified in Policy 15.0.
- This appears to be contrary to 10 CFR 50 Appendix B Criterion XII and ANSI 18.7-1976, paragraph 5.2.16. Justify this apparent conflict.

14. 16.4.1 (80) The change of wording from "assuring that corrective action is implemented and is adequate to prevent recurrence" to "is implemented to prevent or reduce the probability of recurrence" appears contrary to 10 CFR 50 Appendix B Criterion XVI.

Justify this apparent conflict.

15. 16.5.6 (84) See comment for 16.4.1.

16. 18.5.9 (94) See comment for 16.4.1.

17. 18.5.13 (96) This paragraph states that the SRC shall review the results of audits (or summaries thereof).

Explain why the SRC should review a summary of an audit vice the audit itself.

The following comments are keyed to Appendix A which is part of Attachment B and starts on page 78.

18. RG 1.33, 15) (98) Relative to independent verification and ALARA considerations the licensee is committed to ANSI N18.7-1976, not ANS 3.2-1982. ANSI N18.7-1976, paragraph 5.2.6, requires independent verification.

Justify not doing independent verifications in light of existing commitments.

19. RG 1.33, 28) (102) This appears that the licensee does not intend to perform inspections in a manner to ensure quality at least equivalent to that specified in original design basis as required by ANSI N18.7-1976, paragraph 5.2.7. Maintenance and modifications, however, may be done to this level.

Justify why inspections are not done to this level.

20. RG 1.37, 7) (107) This appears to state that if a system is dirty, it doesn't have to be cleaned. Does this mean that if parts are found in the reactor vessel internals, they don't have to be cleaned out since that's the way the system was found?

Justify not cleaning systems to original cleanliness.

21. RG 1.38, 11) (108) Wording should be "Crates and skids shall be used on equipment in excess of 500 lbs". Skids or runners is the terminology used on boxes with a gross weight of 100 lbs. or more.

22. RG 1.64, 4) Editorial 1st sentence 2.2 (items 12 and 13) vice 6.12 and  
(114) 13.
23. RG 1.74, 12) Items a, b, and c appear adequate.  
(120) Provide specific justification for items d, e, f, and g.
24. RG 1.88, 7) Explain why group control is more advantageous than single  
(122) person control. Generally, if no one person has control,  
there is no control.
25. RG 1.88, 8) This exception appears to bypass the intent of the standard.  
(123)  
  
Clarify or provide justification for this exception.
26. RG 1.94, 7) This exception appears to bypass the intent of the standard.  
(129)  
  
Clarify or provide justification for this exception.
27. RG 1.123, 9) This exception appears to bypass the intent of the standard.  
(136)  
  
Clarify or provide justification of this exception.
28. RG 1.144, 12) These exceptions appear to bypass the intent of the standard.  
13),  
(143), (144) Clarify or provide justification of these exception.
29. RG 1.144, 16) Explain guidelines that will be used by QA personnel  
(147) relative to reorganizations or procedure revisions to deter-  
mine if they are significant.
30. RG 1.44, 18) This paragraph states that "Conditions requiring immediate  
(149) corrective action (i.e., those which are so severe that any  
delay would be undesirable) shall be reported as soon as  
practical to management of the audited organization."  
  
Immediate notification is always available since plants work  
24 hours a day, 7 days a week. As soon as practical may mean  
when the person making the identification of the item gets  
around to it. Provide justification for this exception.
31. Editorial: Pages 108 and 109 are misnumbered. They should be 109 and 108  
respectively.
32. Further evaluation of previously approved exceptions or alternatives is being  
conducted by my staff. Additional information or clarification may be  
required.