



April 30, 1992
LD-92-062

Docket 50-002

Attn: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Modifications to Topical Report CENPD-210, Revision 7

Reference: ABB-CE letter LD-92-031 from C. B. Brinkman to G. G. Zech, dated March 12, 1992

Dear Sirs:

The reference letter submitted Revision 7 to CENPD-210 to reflect recent organizational changes. Following review of this material by the NRC staff and based on conversations between Mr. Spraul of the NRR and Mr. Pasquenza of ABB-CE, we are submitting minor modifications to the text of the Revision 7 topical report. The revised material has been annotated by lines in the margins for the benefit of NRC reviewers.

If you have questions regarding the attached material, please contact me or Mr. John Pasquenza at (203) 285-2696.

Sincerely yours,

COMBUSTION ENGINEERING, INC.

Charles B. Brinkman
Acting Director
Nuclear Systems Licensing

Attachment

cc: G. Zech (NRC)
J. Spraul (NRC)
T. Wambach (NRC)

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I. INTRODUCTION

I.1 Purpose

This report describes the quality assurance program employed by ABB Combustion Engineering Nuclear Systems (NS) and ABB Combustion Engineering Nuclear Fuel (NF) for the supply of items and services subject to the requirements of 10CFR50, Appendix B. NS and NF are business units of ABB Combustion Engineering Nuclear Power.

I.2 Scope

This report includes a description of controls employed at the facilities noted below. Section II presents the commitment to quality and describes the quality assurance organization and responsibilities. Section III describes the quality assurance controls employed to address each criterion of 10CFR50, Appendix B. The controls apply to all facilities unless otherwise indicated.

The facilities and the activities involved at each facility include:

<u>Facility</u>	<u>Activities</u>
Headquarters, Windsor, CT (with offices also in Chattanooga, TN)	Engineering services, nuclear fuel design and NSSS design, procurement, testing, inspection, repair and installation.

II. QUALITY POLICY

II.1 Policy Statement

The Presidents of ABB Combustion Engineering Nuclear Systems and ABB Combustion Engineering Nuclear Fuel have authorized the following statement concerning quality assurance policy:

"A primary objective of ABB Combustion Engineering Nuclear Systems and ABB Combustion Engineering Nuclear Fuel is to deliver to our clients defect free, competitive products and services on time that fully comply with contract requirements."

Quality Assurance management within NS and NF has the responsibility for defining their unit's quality assurance program and shall bring to the attention of the President any quality problem that cannot be resolved within the normal execution of this responsibility.

II.2 Quality Assurance Organization

The Nuclear Systems and Nuclear Fuel organizations are shown in Figures II-1 and II-2.

Regardless of the specific organizational structure and organizational titles, Quality Assurance (QA) management is responsible to assure that the QA policy, goals and objectives are transmitted through levels of management. This is accomplished by distribution of Quality Assurance Manuals which contain QA policy statements.

It remains the responsibility of functional line management to assure that the above policy, goals and objectives are met.

Responsibility for nuclear quality assurance rests with each unit's President and is delegated to QA management who may further delegate specific activities to their personnel. Such delegation includes authority to stop work for noncompliance to requirements. Stop work orders are dispositioned by QA and may be originated at any organization level and unit and executed at the level of a Manager, Director, Vice President or President for action. In all cases where personnel perform quality assurance functions, this delegation provides them authority and freedom to initiate, recommend or provide solutions to quality problems through management channels.

Compliance with quality requirements is measured through planned surveillance and/or audit activities and corrective action follow-up by quality assurance personnel. QA is independent of other organizations as shown in Figures II-1 and II-2. QA interprets quality related industry standards for intent and guidance and is responsible for assuring that all quality assurance related procedures used comply with established QA requirements. Each unit participates in an inter-unit audit program to verify that each is implementing its quality assurance program as necessary for items/services provided to each other. When items/services are provided from one unit to another, management of the unit providing the item/service is responsible for the work.

requirements and guidance given in NQA-1 and/or Regulatory Guide 1.28 are described in Table III-2.

In addition to the above, the applicable elements of ASME NQA-2, "Quality Assurance Requirements for Nuclear Facility Application" are applied to activities associated with the ABB Combustion Engineering Nuclear Power Standard Plant Design ("System 80+™ Standard Design" as described in CESSAR-DC). The application of NQA-2 requirements and/or those in ANSI N45.2 and its associated daughter standards for other than CESSAR-DC activities is dependent on client contract requirements.

III.2.2 Program Control

The requirements of this program are implemented at each facility through QA manuals and procedures applicable to the activities conducted at each facility. All such documents are reviewed, approved and controlled by QA to assure compliance with program requirements.

III.2.3 Evaluation of Program Effectiveness

The scope, status, implementation and adequacy of the QA program are assessed by senior levels of management in several ways. The President receives a monthly report from QA management covering major quality issues such as significant internal and client audit findings, industry quality-related developments and quality improvement needs. Quality issues and assessments are discussed during each President's staff meetings. An annual, independent assessment of the QA program is performed by personnel outside a business unit's QA organization. This assessment is documented and any corrective actions are identified and tracked.

Nuclear Systems

President, ABB Combustion Engineering Nuclear Systems

Vice President, Nuclear Systems Engineering

Vice President, Nuclear Systems Development

Director, Quality Assurance

Vice President and General Manager, Newington Operations

Manager, Quality Assurance

Vice President and General Manager, Electro-Mechanics

Manager, Quality Assurance

Controller and Other Administrative Positions

Figure II-1

Nuclear Fuel

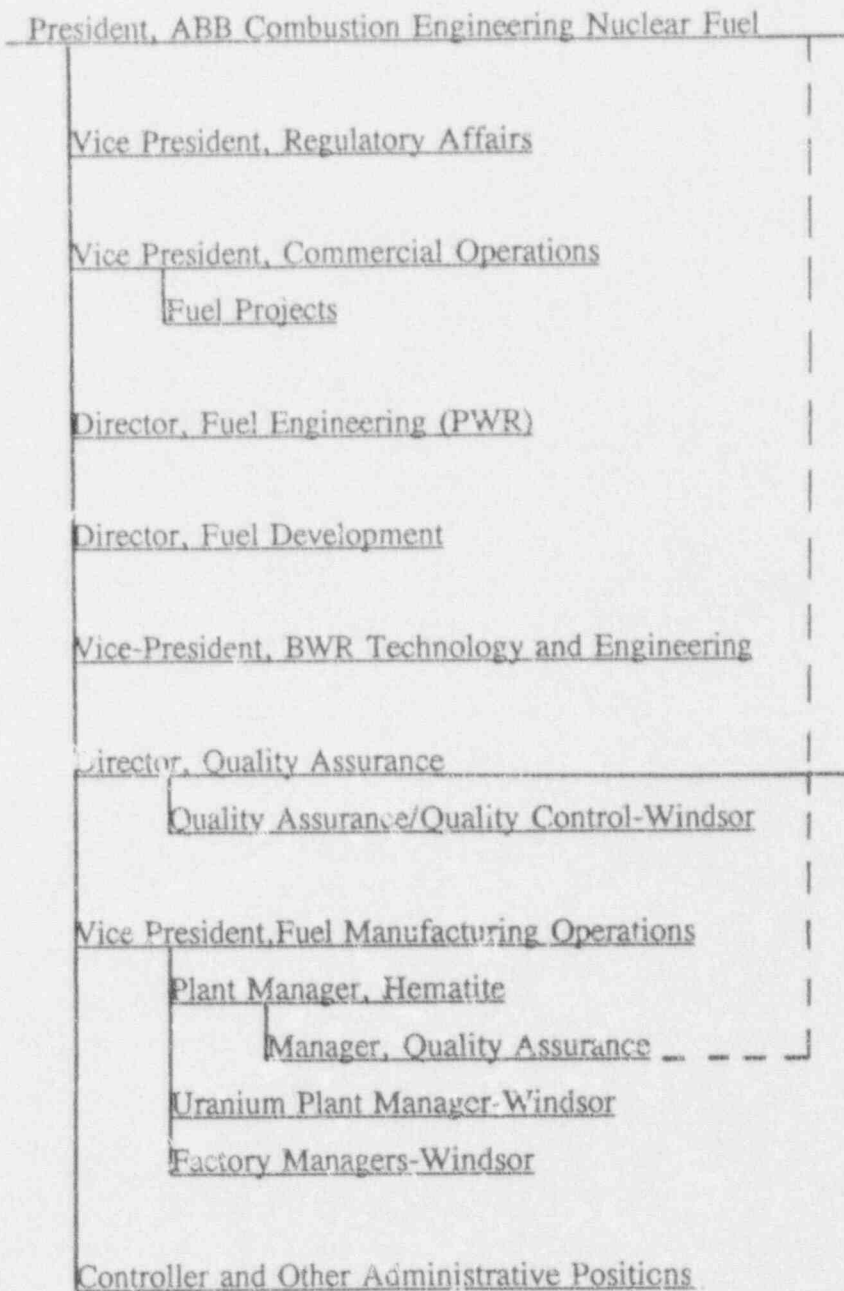


Figure II-2

Table III-1

Responsibilities of Quality Assurance Organization

- o Interface with all NS or NF organizations in the solution of day to day quality problems.
- o Provide the necessary direction for quality through approval and distribution of quality policies, manuals and procedures.
- o Provide an assessment of the scope, status, implementation and adequacy of the QA program.
- o Conduct the QA internal audit program.
- o Provide interpretations for QA Standards.
- o Interface with the U.S. Nuclear Regulatory Commission on quality policies, procedures and requirements.
- o Perform quality data collection and trend analysis.
- o Maintain QA personnel training and qualification records.
- o Perform supplier evaluations.
- o Perform audits at supplier facilities.
- o Review resolution of deviations/nonconforming conditions.
- o Review procurement orders.
- o Establish and execute witness and hold points (surveillance and/or inspection).
- o Monitor conformance to procurement requirements.