

Safety Evaluation of Design and Construction

QA Program Changes

The staff has evaluated Section 17.1 "Quality Assurance During Design and Construction of Amendment 53 to the FSAR and PSNH's letters of August 31, 1984 and October 31, 1984, to G. Knighton which discusses the establishment of a new division within PSNH called New Hampshire Yankee (NHY). NHY has been delegated the responsibility for the design, construction and operation of the Seabrook Station. Under this new organizational arrangement, PSNH continues to delegate to the Yankee Atomic Electric Company (YAEC) responsibility for establishing and implementing the Quality Assurance Program for the construction of the Seabrook station. Also, PSNH continues to retain ultimate responsibility for this program. This arrangement has been acceptable in the past and complies with Criterion I of 10 CFR 50 Appendix B, which permits PSNH to delegate to others, such as contractors, agents, or consultants, the work of establishing and executing the quality assurance program or any part thereof, providing PSNH retains responsibility therefore.

The lines of responsibilities and authorities over quality assurance are adequately described in the FSAR Section 1.4 "Identification of Agents and Contractors," Section 13.1.1.5 "Construction and Construction/Operation Interface," and Section 17.1 "Quality Assurance During Design and Construction," which includes a Section 17.1.1.1.(a) on "Authority, Responsibilities, and Duties." From these descriptions, it is clear that QA personnel within the

YAEC who are responsible for establishing and implementing the Seabrook QA programs report to the YAEC Construction QA Manager. The YAEC Construction QA Manager is assigned exclusively to the Seabrook Project and is responsible for interfacing with the NHY Vice President in charge of Administrative Services. United Engineers and Constructors and Westinghouse Electric Corporation QA programs are extensions of the YAEC QA program and have been reviewed and accepted by YAEC. YAEC maintains control of these and other contractors by means of audits, surveillance, surveys, investigations and reviews.

We conclude that the establishment of the NHY division and the delegated responsibilities to this division from PSNH have not diluted nor weakened the previously approved QA Program for design and construction. Therefore the NHY organization and the QA Program for design and construction is acceptable for the remaining construction activities at the Seabrook Station.