

USQE 95-0042
 OQAP CHANGE QA-027
 SUMMARY OF CHANGES
 Page 1 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| TOC | Definitions | INSERT | QA-027 |
| TOC | CH. 1.0 | INSERT | QA-027 |
| TOC | CH. 2.0 | INSERT | QA-027 |
| TOC | CH. 15.0 | REPLACE | Audit and Surveillance with Overview Activities |
| TOC | CH. 15.0 | INSERT | QA-027 |
| TOC | CH. 16.0 | DELETE | 16.0; Nuclear Fuel Management; 5; 12-30-94 |
| TOC | CH. 16.0 | INSERT | Reserved for future use |
| TOC | CH. 16.0 | INSERT | QA-027 |
| TOC | CH. 18.0 | INSERT | QA-027 |
| DEFINITIONS | | INSERT | Assessment/Evaluation - Systematic examination of plant systems/components, various plant activities or incidents to evaluate the effectiveness of work practices and/or management controls (i.e., self-assessments, independent assessments, and combinations of the two). |
| | Audit | INSERT | An audit may include performance monitoring as an input to satisfy a specific portion or aspect of an audit, but should not totally replace an audit. |

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| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|---------------------|---------------|---|
| | | INSERT | Review - A deliberately critical examination, including observation of plant operation, evaluation of audit results, procedures, certain contemplated actions, and after-the-fact investigations of abnormal conditions. |
| | <u>Surveillance</u> | CHANGE | <u>Surveillance to Surveillance/Quality Performance Monitoring</u> |
| CH. 1.0 | 5.1 | DELETE | and Human Resources and Access. and Group Vice President |
| | 5.1 | INSERT | Human Resources Nuclear, and Nuclear Safety and Quality Concerns Program. and Executive Vice President and General Manager |
| | 5.1.1 | DELETE | Group Vice President |
| | 5.1.1 | INSERT | Executive Vice President and General Manager |
| | 5.1.2.1 | CHANGE | Security to Plant Protection |
| | 5.1.4 | DELETE | fourth paragraph; Group Vice President and The NA&L organization's quality responsibilities during operation are shown in Attachment II. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 3 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | 5.1.4 | INSERT | Executive Vice President and General Manager |
| | 5.1.4.3 | INSERT | performance monitoring, between surveillances and inspections |
| | 5.1.4.4 | DELETE | Group Vice President |
| | 5.1.4.4 | INSERT | Executive Vice President and General Manager |
| | 5.1.5 | DELETE | 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 | INSERT | The General Manager, Plant Services is responsible for implementing quality program requirements applicable to nuclear training, planning and controls; plant projects and programs; information systems; and procurement and material control for STPEGS. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 4 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 5.1.5.1 | DELETE | Records Management and Administration; Director |
| | 5.1.5.1 | INSERT | Planning and Controls; Manager, |
| | 5.1.6 | DELETE | and Access and personnel access authorization for the protected and vital areas of STPEGS. |
| | 5.1.6 | INSERT | Nuclear and ... applicable to employee relations (i.e., access authorization), employee development and organizational effectiveness, salary/compensation, and legal and personnel services. |
| | 5.1.6.1 | DELETE | Access Authorization reports and and Access |
| | 5.1.6.1 | INSERT | The Manager, Employee Relations; Manager, Employee Development & Organizational Effectiveness; Supervisor, Salary/Compensation; and Supervisor, Legal & Personnel Services report to ...Nuclear. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 5 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | 5.1.7 | INSERT | The Director, Nuclear Safety and Quality Concerns Program (NSQP) is responsible for implementing quality program requirements applicable to the NSQP. |
| | 8.1 | DELETE | Attachment 1 - Nuclear Group - QA Functions |
| | 8.1 | INSERT | Attachment I - Nuclear Group Organization |
| | 8.2 | DELETE | Attachment 2 - Quality Responsibilities |
| | Att. I | CHANGE | The title of the attachment to indicate Nuclear Group Organization |
| | Att. I | CHANGE | Group VP to Exec. VP and Gen. Mgr. |
| | Att. I | CHANGE | The title Nuclear Security to Nuclear Plant Protection |
| | Att. I | CHANGE | The title in Human Resources Access box to read Human Resources Nuclear |
| | Att. I | DELETE | Box with title Access Authorization |

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | Att. I | INSERT | Four (4) boxes reporting to Human Resources Nuclear with the following titles: Legal & Personnel Services, Employee Devel. & Org. Effectiveness, Employee Relations, and Policy |
| | Att. I | INSERT | Box reporting directly to the Group V.P., Nuclear with title: Nuclear Safety and Quality Concerns Program |
| | Att. 1I | DELETE | Entire attachment |
| CH. 2.0 | 2.1 | DELETE | Physical Security Program |
| | 5.2.2 | DELETE | Delete entirely |
| | 5.3.1 | DELETE | Group Vice President |
| | 5.3.1 | INSERT | Executive Vice President and General Manager |
| | 5.6.1 | DELETE | audits and surveillance(s) |
| | 5.6.1 | INSERT | appropriate overview activities |
| | 5.6.2 | DELETE | Monitoring and surveillance of the quality control and NDE activities shall be performed by Operations QA personnel. |

USQE 95-0042
 OQAP CHANGE QA-027
 SUMMARY OF CHANGES
 Page 7 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 5.11.2 | DELETE | Group Vice President |
| | 5.11.2 | INSERT | Executive Vice President and General Manager |
| | 5.13.1 | INSERT | performance monitoring, assessments/evaluations, NDE, after the word surveillance |
| | 5.13.2 | DELETE | audits, surveillance, and inspection and Group Vice President |
| | 5.13.2 | INSERT | quality overview activities and Executive Vice President and General Manager |
| | 5.13.3 | DELETE | Group Vice President |
| | 5.13.3 | INSERT | Executive Vice President and General Manager |
| | 7.1 | DELETE | Attachment I OQAP - 10CFR50, Appendix B Matrix |
| | 7.1 | INSERT | None |
| | ATT. I | DELETE | Delete entire attachment |
| CH. 15.0 | HEADER | DELETE | AUDIT AND SURVEILLANCE |
| | HEADER | INSERT | OVERVIEW ACTIVITIES |
| | 1.1 | DELETE | audits and surveillance |
| | 1.1 | INSERT | independent overview activities |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 8 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 2.1 | DELETE | internal audits and site surveillance which include preparation, performance, reporting, and follow-up |
| | 2.1 | INSERT | independent overview activities which includes audits, assessments, evaluations, performance monitoring, and surveillances |
| | 4.1 | DELETE | ANSI N45.2.12/Reg. Guide 1.144, Auditing of Quality Assurance Programs for Nuclear Power Plants |
| | 4.1 | INSERT | UFSAR Table 3.12-1 |
| | 5.1 | DELETE | 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 |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 9 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | | | management. The following areas are included in the audit program: |
| | 5.1 | INSERT | Independent Overview Activities |
| | 5.1.1 | DELETE | Operation, maintenance, and modifications |
| | 5.1.1 | INSERT | Procedures shall be developed to control independent overview activities. These activities include, but are not limited to, audits, assessments, evaluations, performance monitoring, and surveillances. These activities shall be used to observe and verify that activities are accomplished in accordance with prescribed requirements. |
| | 5.1.2 | DELETE | Preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings |
| | 5.1.3 | DELETE | Material and special process control |
| | 5.1.4 | DELETE | Indoctrination and training programs |

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 5.1.5 | DELETE | Implementation of operating and test procedures |
| | 5.1.6 | DELETE | Calibration of measuring and test equipment |
| | 5.1.7 | DELETE | Corrective action and nonconformance control |
| | 5.1.8 | DELETE | Performance of the plant staff, including training records |
| | 5.1.9 | DELETE | Plant inspection activities |
| | 5.2 | DELETE | Qualified personnel assigned auditing responsibilities shall be independent of any direct responsibility for the performance of the activities which they audit; shall 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 | INSERT | Audits |
| | 5.2.1 | DELETE | An audit team consists of one (or more) qualified person(s). A qualified lead auditor shall be |

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | | | 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 thirty days after the post-audit conference. |
| | 5.2.1 | INSERT | 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. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 12 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | | | 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: |
| | 5.2.1.1 | INSERT | Operation, maintenance, and modifications |
| | 5.2.1.2 | INSERT | Preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings |
| | 5.2.1.3 | INSERT | Material and special process control |
| | 5.2.1.4 | INSERT | Indoctrination and training programs |
| | 5.2.1.5 | INSERT | Implementation of operating and test procedures |
| | 5.2.1.6 | INSERT | Calibration of measuring and test equipment |
| | 5.2.1.7 | INSERT | Corrective action and nonconformance control |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 13 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | 5.2.1.8 | INSERT | Performance of the plant staff, including training records |
| | 5.2.1.9 | INSERT | Plant inspection activities |
| | 5.2.2 | DELETE | 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. |
| | 5.2.2 | INSERT | Qualified personnel assigned auditing responsibilities shall be independent of any direct responsibility for the performance of the activities which they audit; shall be experienced or trained commensurate with the scope, complexity, or special nature of the activities to be audited; and shall be qualified in |

USQE 95-0042
QQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 14 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | | | accordance with the requirements of Reference 4.2. |
| | 5.2.2.1 | INSERT | 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. |
| | 5.2.2.2 | INSERT | Other qualified personnel may assist in the conduct of audits, such as technical specialists or management representatives. |

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 5.2.3 | INSERT | Internal Audits |
| | 5.2.3.1 | INSERT | Internal audits shall be conducted by the Quality Department and performed with a frequency commensurate with their safety significance, past performance and regulatory requirements. |
| | 5.2.3.2 | INSERT | Review of the audit program shall be performed at least semiannually by the Nuclear Safety Review Board by a management representative to verify that audits are being accomplished in accordance with the requirements of the QA Program. |
| | 5.2.3.3 | INSERT | 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. |

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 5.2.3.4 | INSERT | Audited organizations are responsible for providing timely corrective action including action to prevent recurrence for programmatic problems identified by an audit. |
| | 5.2.4 | INSERT | Supplemental audits shall be conducted when: |
| | 5.2.4.1 | INSERT | Significant changes are made to the quality assurance program. |
| | 5.2.4.2 | INSERT | It is necessary to determine the root cause of problem areas which may impact the effectiveness of the quality assurance program. |
| | 5.2.4.3 | INSERT | A systematic, independent assessment of program effectiveness is necessary. |
| | 5.2.4.4 | INSERT | Requested by appropriate management. |
| | 5.2.5 | INSERT | Audit implementation shall include the following: |
| | 5.2.5.1 | INSERT | Written notification to the audited organization of the audit, if an announced audit. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 17 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | 5.2.5.2 | INSERT | Development of an individual audit plan/scope. The audit plan and any necessary reference documents shall be available to the audit team members. |
| | 5.2.5.3 | INSERT | A pre-audit and post-audit conference with responsible organizational management. |
| | 5.2.5.4 | INSERT | Use of a checklist or procedure as a guide during the performance of the audit. |
| | 5.2.5.5 | INSERT | Identifying and documenting audit deficiencies. |
| | 5.2.5.6 | INSERT | Audit reports shall be prepared and submitted to the audited organization within thirty days after the post-audit conference. The audit report shall address those items required by Reference 4.1. |
| | 5.2.5.7 | INSERT | Audited organizations provide timely and thorough corrective action and recurrence control to discrepancies identified during the audit. In the event that |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 18 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | | | 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. |
| | 5.2.5.8 | INSERT | Evaluation of corrective action for deficiencies and follow-up verification as appropriate. |
| | 5.3 | DELETE | An approved audit plan shall be issued annually to include: |
| | 5.3 | INSERT | Surveillance/Quality Performance Monitoring |
| | 5.3.1 | DELETE | Activities/organizations to be audited. |
| | 5.3.1 | INSERT | Procedures and/or instructions shall be developed to control surveillance/quality performance monitoring activities. |

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | | | Surveillance/quality performance monitoring activities shall be used to observe and verify that activities are accomplished in accordance with prescribed procedures. |
| | 5.3.2 | DELETE | Time frame in which the audit will be conducted. |
| | 5.3.2 | INSERT | Surveillance/quality performance monitoring activities will be performed on both units during refueling outages, startup activities, and normal and off-normal operational activities. Areas will be determined based on safety significance, past performance, regulatory requirements, and customer request. |
| | 5.3.3 | INSERT | The frequency of site surveillance/quality performance monitoring activities is based upon the complexity of the activity, importance of the activity, and severity level of conditions noted during previous overview activities. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 20 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 5.3.4 | INSERT | Surveillance/quality performance monitoring results shall be documented and a summary shall be prepared and transmitted to responsible management. |
| | 5.4 | DELETE | Internal Audits |
| | 5.4 | INSERT | Assessments/Evaluations |
| | 5.4.1 | DELETE | Internal audits shall be conducted by the Quality Department and performed with a frequency commensurate with their safety significance, past performance and regulatory requirements. An audit of safety-related activities shall be completed in accordance with formal audit schedules. |
| | 5.4.1 | INSERT | Assessments are conducted annually in accordance with written procedures to assess Nuclear Assurance & Licensing's implementation of the Operations Quality Assurance Program. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 21 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | 5.4.1.1 | INSERT | These assessments will be conducted by organizations independent of the activities performed to assure the HL&P OQAP is being properly implemented. |
| | 5.4.1.2 | INSERT | The Nuclear Safety Review Board shall define the scope of the assessment and determine the schedule. |
| | 5.4.1.3 | INSERT | The results of these assessments will be transmitted to the Executive Vice President and General Manager, Nuclear. |
| | 5.4.2 | DELETE | 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. |
| | 5.4.2 | INSERT | Other assessments/evaluations may be performed to verify activities are accomplished in accordance with |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 22 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | | | applicable requirements and prescribed procedures. |
| | 5.4.2.1 | INSERT | These assessments/evaluations will be performed on areas based on their safety significance, past performance, regulatory requirements, and customer request. |
| | 5.4.2.2 | INSERT | Assessment/evaluation results shall be documented and transmitted to appropriate management. |
| | 5.4.3 | DELETE | 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. |
| | 5.4.3 | INSERT | Assessments and audits may be interchangeable provided the scope is appropriate and approved by the Director, Quality. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 23 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 5.4.4 | DELETE | Audited organizations are responsible for providing timely corrective action including action to prevent recurrence for programmatic problems identified by an audit or surveillance. |
| | 5.5 | DELETE | Supplemental audits shall be conducted when: |
| | 5.5 | INSERT | An approved overview plan shall be issued annually to include: |
| | 5.5.1 | DELETE | Significant changes are made to the quality assurance program. |
| | 5.5.1 | INSERT | Activities/organizations to be overviewed. |
| | 5.5.2 | DELETE | It is necessary to determine the root cause of problem areas which may impact the effectiveness of the quality assurance program. |
| | 5.5.2 | INSERT | Time frame in which the overview activity will be conducted. |
| | 5.5.3 | DELETE | A systematic, independent assessment of program effectiveness is necessary. |

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | 5.5.4 | DELETE | Requested by appropriate management. |
| | 5.6 | DELETE | Audit implementation shall include the following: |
| | 5.6 | INSERT | Nonconforming equipment, components, parts, materials, activities or documentation identified during an independent overview activity shall be documented in accordance with Reference 4.4. |
| | 5.6.1 | DELETE | Written notification to the audited organization of the scheduled audit, if an announced audit. |
| | 5.6.2 | DELETE | Development of an individual audit plan/scope. |
| | 5.6.2.1 | DELETE | The audit plan and any necessary reference documents shall be available to the audit team members. |
| | 5.6.3 | DELETE | A pre-audit and post-audit conference with responsible organizational management. |

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | 5.6.4 | DELETE | Use of a checklist or procedure as a guide during the performance of the audit. |
| | 5.6.5 | DELETE | Identifying and documenting audit deficiencies. |
| | 5.6.6 | DELETE | Audit reports shall be prepared and submitted to the audited organization within thirty days after the post-audit conference. The audit report shall address those items required by Reference 4.1. |
| | 5.6.7 | DELETE | 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. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 26 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|---|
| | 5.6.8 | DELETE | Evaluation of corrective action for deficiencies and follow-up verification as appropriate. |
| | 5.7 | DELETE | 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. |
| | 5.7 | INSERT | Personnel performing independent overview activities shall be trained and qualified in accordance with Reference 4.2. |
| | 5.8 | DELETE | Procedures shall be developed to control site surveillance activities. Site surveillance shall be used to observe and verify that quality- |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 27 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | | | related activities are accomplished in accordance with prescribed procedures. |
| | 5.9 | DELETE | A surveillance schedule shall be developed to ensure adequate coverage of quality-related activities. |
| | 5.9.1 | DELETE | 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 | DELETE | Unscheduled site surveillance may be performed to accommodate changes in plant conditions or systems. |
| | 5.10 | DELETE | Scheduled site surveillances are performed using a surveillance checklist. The surveillance checklist shall be prepared using applicable procedures, specifications, codes, and regulatory requirements for source requirements. |

USQE 95-0042
OQAP CHANGE QA-027
SUMMARY OF CHANGES
Page 28 of 28

ALL CHANGES ARE IN BOLD TYPE

| <u>CHAPTER</u> | <u>LOCATION</u> | <u>ACTION</u> | <u>TEXT</u> |
|----------------|-----------------|---------------|--|
| | 5.11 | DELETE | 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 | DELETE | 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 | DELETE | Personnel performing surveillance shall be trained and qualified in accordance with Reference 4.2. |
| CH. 16.0 | ALL | DELETE | Delete entire chapter. |
| CH. 18.0 | 5.2 | REPLACE | audits and surveillances with appropriate quality overview activities |

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|--|------------------------------------|-----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN TABLE OF CONTENTS | NUMBER Table of Contents | REV. NO. 11 |
| | PAGE 1 OF 2 | |
| | EFFECTIVE DATE 12-30-94 | |

Chapters Requiring NRC Approval

| Chapter Number | Title | Effective Chapter Revision | Effective Revision Date | Change Notice No. |
|----------------|--|----------------------------|-------------------------|----------------------------|
| | Definitions | 5 | 12-21-90 | QA-027 |
| 1.0 | Organization | 7 | 12-30-94 | QA-024 QA-025 QA-027 |
| 2.0 | Program Description | 9 | 12-30-94 | QA-025 QA-027 |
| 3.0 | Conduct of Plant Operations | 6 | 12-20-91 | |
| 4.0 | Qualification, Training, and Certification of Personnel | 5 | 12-30-94 | |
| 5.0 | Maintenance, Installation of Modifications, and Related Activities | 4 | 12-21-90 | |
| 6.0 | Design and Modification Control | 6 | 12-18-92 | |
| 7.0 | Procurement | 6 | 12-30-94 | |
| 8.0 | Control and Issuance of Documents | 4 | 12-21-90 | QA-026 |
| 9.0 | Control of Material | 5 | 12-20-91 | |
| 10.0 | Inspection | 6 | 12-21-90 | |
| 11.0 | Test Control | 5 | 12-21-90 | |
| 12.0 | Instrument and Calibration Control | 5 | 12-21-90 | |
| 13.0 | Deficiency Control | 6 | 12-30-94 | QA-025 |
| 14.0 | Records Control | 4 | 12-21-90 | |
| 15.0 | Quality Assurance Overview Activities | 5 | 12-30-94 | QA-025 QA-027 |

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|--|----------------------------|-------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN TABLE OF CONTENTS | NUMBER | REV. NO. |
| | Table of Contents | 11 |
| | PAGE 2 OF 2 | |
| | EFFECTIVE DATE 12-30-94 | |

Chapters Not Requiring NRC Approval

| Chapter Number | Title | Effective Chapter Revision | Effective Revision Date | Change Notice No. |
|-------------------|---|----------------------------------|-------------------------------|-------------------------|
| 16.0 | Reserved for future use | | | QA-027 |
| 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 | QA-027 |

| | | |
|--|-----------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER Definitions | REV. NO. 5 |
| | PAGE 1 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |

This chapter is provided to define terminology used in chapters of the OQAP. They are derived from standard definitions where possible. Program procedures and documents which implement the OQAP may provide variations of these definitions providing the intent of the OQAP definition and requirements are satisfied.

DEFINITIONS

Abnormal Condition - Any of the following:

- a. Exceeding a limiting condition for a power plant operation established in the applicable technical specifications.
- b. Observed inadequacies in the implementation of administrative or procedural controls such that the adequacy causes or threatens to cause the existence or development of an unsafe condition in connection with the operation of a nuclear power plant.
- c. Conditions arising from natural or off-site man-made events that affect or threaten to affect the safe operation of a power plant.

Administrative controls - Rules, orders, instructions, procedures, policies, and designations of authority and responsibility written by management to obtain assurance of safety and high-quality operation.

Approval - An act of endorsing or adding positive authorization or both.

Approved Vendors List - A listing of vendors who have been evaluated to specific criteria and have been found to be qualified to provide specific items and/or services.

As-Built Data - Documented data that describe the condition actually achieved in a product.

Assessment/Evaluation - Systematic examination of plant systems/components, various plant activities or incidents to evaluate the effectiveness of work practices and/or management controls (i.e., self-assessments, independent assessments, and combinations of the two).

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|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER Definitions | REV. NO. 5 |
| | PAGE 2 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |

Audit - A documented activity performed in accordance with written procedures or checklists to verify, by examination and evaluation of objective evidence, that applicable elements of the quality assurance program have been developed, documented, and effectively implemented in accordance with specified requirements. An audit does not include surveillance or inspection for the purpose of process control or product acceptance (ANSI N45.2.12). An audit may include performance monitoring as an input to satisfy a specific portion or aspect of an audit, but should not totally replace an audit.

QA-027

Authorized Nuclear Inspector (ANI) - Inspectors performing inspections required by Section III of the ASME Code who have been qualified by written examination under the rules of any state of the United States or province of Canada which has adopted the Code. The inspector shall be an employee of an authorized inspection agency and shall not be an employee of the Certificate of Authorization holder. The ANI shall meet the requirements of ANSI N626.

Authorized Nuclear Inservice Inspector (ANII) - Inspectors performing inspections required by Section XI of the ASME code. The ANII is a representative of an authorized inspection agency or a state or municipality of the United States, Canadian Province, or other enforcement authority having jurisdiction over the Nuclear Power components at the plant site.

Calibration - The process by which standards or working equipment are checked against standards of known higher accuracy and adjusted as necessary to ensure their compliance with designated specifications.

Certification - The action of determining, verifying, and attesting in writing to the qualifications of personnel or material.

Cleanness - A state of being clean in accordance with predetermined standards, and usually implies freedom from dirt, scale, heavy rust, oil, or other contaminating impurities.

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|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER Definitions | REV. NO. 5 |
| | PAGE 3 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |

Commercial Grade Item - A commercial grade item (as defined in 10CFR21) is one which:

- a. Is not subject to design or specification requirements that are unique to the nuclear power industry; and
- b. Is used in applications other than in the nuclear power industry; and
- c. Is to be procured from a manufacturer or supplier on the basis of specifications set forth in the manufacturer's published product description (i.e., catalog).

Component - A piece of equipment such as a vessel, piping, pump, valve, or core support structure, which will be combined with other components to form an assembly.

Contaminants - Foreign materials such as mill scale, dirt, oil, chemicals, and any matter that renders a fluid, solid, or surface impure and unclean according to present standards of acceptable cleanness.

Contractor - Any organization under contract for furnishing equipment, material, or services. It includes the terms vendor, supplier, subcontractor, fabricator, and subtier levels of these, where appropriate. Prime contractor is used to indicate either the architect engineer, NSSS supplier, constructor, or nuclear fuel supplier.

Corrective Action - Any appropriate measure applied for the purpose of making less likely the recurrence of the initial deficiency. Examples are:

- a. Revision of procedures, practices, and/or design documents.
- b. Increased surveillance of procedures and practices.
- c. Work stoppage until problem situation is alleviated.
- d. Special training of personnel.
- e. Reassignment of personnel.

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|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER Definitions | REV. NO. 5 |
| | PAGE 4 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |

Corrective Maintenance - Repair and restoration of equipment or components that have failed or are malfunctioning and are not performing their intended function.

Critical Characteristics - Identifiable and measurable attributes/variables of a commercial grade item, which once selected to be verified, provide reasonable assurance that the item received is the item specified.

Dedication - The point in time after which a commercial grade item is accepted for a safety-related application and deficiency reporting becomes the responsibility of the party performing the acceptance.

Deficiency - The characteristic of an item or document that makes it nonconforming with the original criteria and is reported as audit findings, supplier deficiencies, event reports, significant defects, nonconformance reports, corrective action reports, or other procedurally controlled mechanisms.

Design - Technical and management processes which commence with identification of design input and which lead to and include the issuance of design output documents.

Design Control - Design control is the process used to verify that the design drawings, design calculations and specifications, including fabrication and inspection procedures for both shop and field, meet the project requirements.

Design Input - Those criteria, parameters, bases, or other design requirements upon which a detailed final design is based.

Design Output - Documents such as drawings, specifications, and other documents defining technical requirements of structures, systems, and components.

Document Review - The process of appraisal of documentation to determine the adequacy of the document with respect to quality/technical requirements.

Drawing - A document which depicts the geometric configuration of an item, or the function of an item.

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|--|----------------------------|-------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER | REV. NO. |
| | Definitions | 5 |
| | PAGE 5 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |

Equivalency Evaluation - A technical evaluation performed to confirm that an alternative item, not identical to the original item, will satisfactorily perform its intended function once in service. This term is synonymous with "Equal-to-or-Better-Than Evaluation".

Examination - An element of inspection consisting of investigation of materials, components, supplies, or services, to determine conformance to those specified requirements which can be determined by such investigation. Examination is usually nondestructive and includes simple physical manipulation, gaging, and measurement.

Handling - An act of physically moving items by hand or mechanical means, but not including transport modes.

Hold Point - A preselected step in any procedure or work process that identifies a portion or portions of the procedure or work process which requires QA/QC inspection due to the complexity, safety considerations, and/or inaccessibility of the activity and beyond which work may not progress until the required inspection is performed.

In-Service Inspection - The inspection performed generally during a reactor refueling outage or plant shutdown which assures that the nuclear equipment, vessels, and materials are of sufficient integrity to provide protection of public health and safety.

Inspection - A phase of quality control by which means of examination, observation, or measurement determines the conformance of materials, supplies, components, parts, appurtenances, systems, processes, or structures to predetermined quality requirements.

Item - Any level of unit assembly, including structures, system, subsystem, subassembly, component, part, or material.

Material - A substance or combination of substances forming components, parts, pieces, and equipment items. (Intended to include such as machinery, castings, liquids, formed steel shapes, aggregates, and cement.)

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|--|-----------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER Definitions | REV. NO. 5 |
| | PAGE 6 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |

Nonconformance - A deficiency in characteristic, documentation, or procedure which renders the quality of an item unacceptable or indeterminate. Examples of nonconformance include: physical defects, test failures, incorrect or inadequate documentation, or deviation from prescribed processing, inspection, or test procedures.

Notification Point - A preselected step established by Quality Control in any procedure or work process which identifies a discretionary inspection point which may be waived based on the availability of Quality Control personnel and other activities of a more critical nature.

Nuclear Fuel - Uranium ore, converted uranium, enriched uranium, fabricated fuel, pins and assemblies.

Package - A wrapping or container including its contents of material or equipment.

Part - An item which has work performed on it and which is attached to and becomes part of a component before completion of the component.

Plant Modification - A planned physical change to a plant structure, system or component as described in design documents.

Preventive Maintenance - Preventive, periodic and planned maintenance actions taken to maintain a piece of equipment within design operating conditions and extend its life and is performed prior to equipment failure. This includes technical specification surveillances, inservice inspections and other regulatory forms of preventive maintenance.

Procedure - A document that specifies or describes how an activity is to be performed. It may include methods to be employed, equipment, or materials to be used and sequence of operations.

Procurement - Interdisciplinary function by which equipment, materials, or services are acquired.

Procurement Documents - Purchase requisitions, purchase orders, drawings, contracts, specifications or instructions used to define requirements for purchase. (ANSI N45.2.13)

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|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER Definitions | REV. NO. 5 |
| | PAGE 7 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |
| | | |

Proposal - A document which describes the equipment, material, or services which the vendor proposes to furnish. The proposal should include commercial information and a statement of any exceptions to the provisions of the inquiry.

Purchase Order (or Contract) - A document authorizing a vendor to provide equipment, material or services in accordance with the terms and conditions established in the purchase order or contract.

Qualification (Personnel) - The characteristics or abilities gained through training or experience or both that enable an individual to perform a required function.

Qualified Procedure - A procedure which incorporates all applicable codes and standards, manufacturer's parameters, and engineering specifications and has been proven adequate for its intended purpose.

Quality Assurance - All those planned or systematic actions necessary to provide adequate confidence that an item or facility will perform satisfactorily in service.

Quality Control - Those quality assurance actions which provide a means to control and measure the characteristics of an item, process, or facility to established requirements.

Quality-Related - Those activities or items required to be included in the Operations QA program by the UFSAR, Federal Codes, other regulatory licensing requirements or management directive. The term quality-related encompasses safety related activities or items.

Quality-Related Item - A structure, system, or component identified in UFSAR Section 3.2 as requiring quality assurance during the operations phase of STPEGS.

Receiving - Taking delivery of an item at a designated location.

Records - Those records, physical or electronic media, which furnish documentary evidence of the quality of items and of activities affecting quality. A document is considered a quality assurance record when the document has been completed.

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|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER Definitions | REV. NO. 5 |
| | PAGE 8 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |
| | | |

Reference Standard - Standards (that is, primary, secondary and working standards, where appropriate) used in a calibration program. These standards establish the basic accuracy limits for that program.

Repair - The process of restoring a nonconforming characteristic to a condition such that the capability of an item to function reliably and safety is unimpaired even though the item still may not conform to the original statement.

Replacements - Spare and renewal components, appurtenances and subassemblies or parts of a component or system. Replacements also include the addition of components but do not include the addition of complete systems.

Review - A deliberately critical examination, including observation of plant operation, evaluation of audit results, procedures, certain contemplated actions, and after-the-fact investigations of abnormal conditions.

Rework - The process by which a nonconforming item is made to conform to a prior specified requirement by completion, remachining, reassembling, or other corrective means.

Safety-Related - Those plant features necessary to assure the integrity of the reactor coolant pressure boundary, the capability to shut down the reactor and maintain it in a safely shutdown condition, or the capability to prevent or mitigate the consequences of accidents which could result in off-site exposures comparable to the guideline exposure of NRC Regulations 10CFR100.

Special Process - A process, the results of which are highly dependent on the control of the process or the skill of the operators, or both, and in which the specified quality cannot be readily determined by inspection or test of the product.

Specification - A concise statement of a set of requirements to be satisfied by a product, material, or process indicating, whenever appropriate, the procedure by means of which it may be determined whether the requirements given are satisfied. (Specifications may also be used to describe technical services to be provided.)

QA-027

| | | |
|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN DEFINITIONS | NUMBER Definitions | REV. NO. 5 |
| | PAGE 9 OF 9 | |
| | EFFECTIVE DATE 12-21-90 | |

Standard - The result of a particular standardization effort approved by a recognized authority.

Stop Work - The suspension of an activity.

Storage - The act of holding items at the construction site or in an area other than its permanent location in the plant.

Surveillance/Quality Performance Monitoring - The act of observing real time activities and/or reviewing documentation to verify conformance with specified requirements and industry good practices, and to evaluate their adequacy and effectiveness.

QA-027

Surveillance Testing - Periodic testing to verify that safety-related structures, systems, and components continue to function or are in a state of readiness to perform their function.

Survey - An activity performed in a vendor's facility to determine the adequacy and implementation of a vendor's quality assurance program. This activity is normally done prior to award of a purchase order.

System - A group of subsystems united by some interaction or interdependence, performing duties but functioning as a single unit.

Testing - The determination or verification of the capability of an item to meet specified requirements by subjecting the item to a set of physical, chemical, environmental, or operating conditions.

Use-as-is - A disposition which may be imposed for a nonconformance when it can be established that the discrepancy will result in no adverse conditions and that the item under consideration will continue to meet all engineering functional requirements including performance, maintainability, fit, and safety.

Verification - An act of confirming, substantiating, and assuring that an activity or condition has been implemented in conformance with the specified requirements.

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| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER Chapter 1.0 | REV. NO. 7 |
| | PAGE 1 OF 6 | |
| | EFFECTIVE DATE 12/30/94 | |

1.0 PURPOSE

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 SCOPE

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 REFERENCES

4.1 None

5.0 RESPONSIBILITIES

5.1 The Nuclear Group is comprised of Nuclear Generation, Nuclear Engineering, Nuclear Assurance & Licensing (NA&L), Plant Services, Human Resources Nuclear, and Nuclear Safety and Quality Concerns Program. The heads of these groups report to the Executive Vice President and General Manager, Nuclear.

5.1.1 The Executive Vice President and General Manager, Nuclear, has overall responsibility for the implementation of the Operations Quality Assurance Program and approving the Operations Quality Assurance Plan (OQAP) and revisions thereto.

QA-021

| | | |
|---|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER Chapter 1.0 | REV. NO. 7 |
| | PAGE 2 OF 6 | |
| | EFFECTIVE DATE 12/30/94 | |

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, security, and radiological monitoring functions of STPEGS.

520-025
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5.1.2.1

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

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QA-025

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, and maintenance of the STPEGS.

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QA-025

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, and engineering support functions.

520-025
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5.1.3.1

The Manager, Design Engineering; Manager, Systems Engineering; and Director, Nuclear Fuel and Analysis report to the Vice President, Nuclear Engineering.

520-025
QA-025

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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|---|----------------------------|-------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER | REV. NO. |
| | Chapter 1.0 | 7 |
| | PAGE 3 OF 6 | |
| | EFFECTIVE DATE 12/30/94 | |

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

8A-027

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|---|-------------------------|---------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER Chapter 1.0 | REV. NO. 7 |
| | PAGE 4 OF 6 | |
| | EFFECTIVE DATE 12/30/94 | |

5.1.4.3 The Director, Quality is responsible for Independent Safety Review Group activities, audits, independent assessments, surveillances, performance monitoring, inspections and NDE examinations.

L20-VA QA-027

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 Executive Vice President and General Manager, Nuclear.

L20-VA QA-027

5.1.5 The General Manager, Plant Services is responsible for implementing quality program requirements applicable to nuclear training, planning and controls; plant projects and programs; information systems; and procurement and material control for STPEGS.

L20-VA QA-027

5.1.5.1 The Manager, Nuclear Training; Manager, Planning and Controls; Manager, Nuclear Information Systems; Manager, Plant Projects and Programs; and Director, Nuclear Purchasing and Materials Management; report to the General Manager, Plant Services.

L20-VA QA-027

5.1.6 The Manager, Human Resources Nuclear is responsible for implementing quality program requirements applicable to employee relations (i.e., access authorization), employee development and organizational effectiveness, salary/compensation, and legal and personnel services.

L20-VA QA-027

5.1.6.1 The Manager, Employee Relations; Manager, Employee Development & Organizational Effectiveness; Supervisor, Salary/Compensation; and Supervisor, Legal & Personnel Services report to the Manager, Human Resources Nuclear.

L20-VA QA-027

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|--|----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>ORGANIZATION</p> | <p>NUMBER</p> <p>Chapter 1.0</p> | <p>REV. NO.</p> <p>7</p> |
| | <p>PAGE 5 OF 6</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |
| | | |

5.1.7 The Director, Nuclear Safety and Quality Concerns Program (NSQP), is responsible for implementing quality program requirements applicable to the NSQP.

QA-027

6.0 REQUIREMENTS

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

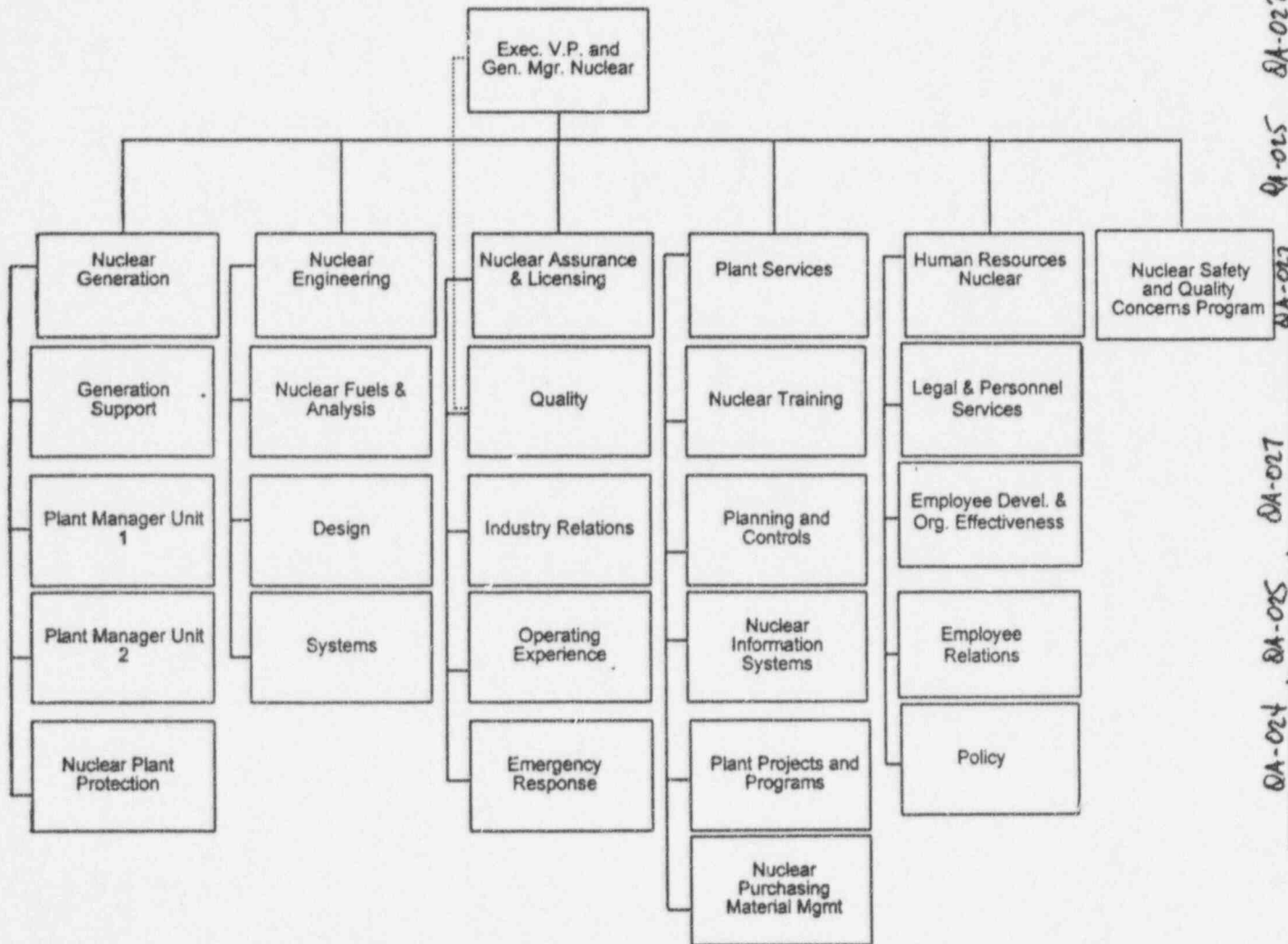
8.1 Attachment I - Nuclear Group Organization

QA-027

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|---|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ORGANIZATION | NUMBER Chapter 1.0 | REV. NO. 7 |
| | PAGE 6 OF 6 | |
| | EFFECTIVE DATE 12/30/94 | |

ATTACHMENT I

NUCLEAR GROUP ORGANIZATION



| | | |
|---|----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>PROGRAM DESCRIPTION</p> | <p>NUMBER</p> <p>Chapter 2.0</p> | <p>REV. NO.</p> <p>9</p> |
| | <p>PAGE 1 OF 10</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |

1.0 PURPOSE

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 casks); 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 (OQAP) 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, Seismic and Environmental Equipment Qualification Programs, Radiation Protection Program, and Station Blackout (SBO) systems and equipment.

DA-027

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

- 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 REQUIREMENTS

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.

| | | |
|---|----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>PROGRAM DESCRIPTION</p> | <p>NUMBER</p> <p>Chapter 2.0</p> | <p>REV. NO.</p> <p>9</p> |
| | <p>PAGE 2 OF 10</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |
| | | |

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.

QA-027

5.3 Establishing Policies and Goals

5.3.1 QA policies and goals for STPEGS are defined in the OQAP. The Executive Vice President and General Manager, Nuclear has overall responsibility for quality assurance.

QA-027

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 Six years experience in the field of quality assurance, preferably at an operating nuclear power plant, or operations supervisory experience. At least one year shall be nuclear power plant experience in the overall implementation of the quality assurance program.

5.3.2.3 Familiarity with nuclear power generation facilities and operations.

5.3.2.4 Fifteen years experience in industry quality assurance standards, and federal and state regulatory requirements.

5.3.2.5 Management experience and familiarity with HL&P corporate organizations.

QA-025

| | | |
|---|----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>PROGRAM DESCRIPTION</p> | <p>NUMBER</p> <p>Chapter 2.0</p> | <p>REV. NO.</p> <p>9</p> |
| | <p>PAGE 3 OF 10</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |

5.3.3 Procedures and revisions which control quality-related 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.

5.5 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.

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.

DA-025

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|---|----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>PROGRAM DESCRIPTION</p> | <p>NUMBER</p> <p>Chapter 2.0</p> | <p>REV. NO.</p> <p>9</p> |
| | <p>PAGE 4 OF 10</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |
| | | |

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 appropriate overview activities 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.

QA-027

QA-027

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 safety-related 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.

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.

| | | |
|---|---------------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>PROGRAM DESCRIPTION</p> | <p>NUMBER</p> <p>Chapter 2.0</p> | <p>REV. NO.</p> <p>9</p> |
| | <p>PAGE 5 OF 10</p> | |
| | <p>EFFECTIVE DATE</p> <p>12/30/94</p> | |
| | | |

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.

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.

| | | |
|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN PROGRAM DESCRIPTION | NUMBER Chapter 2.0 | REV. NO. 9 |
| | PAGE 6 OF 10 | |
| | EFFECTIVE DATE 12/30/94 | |

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.

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.

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|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN PROGRAM DESCRIPTION | NUMBER Chapter 2.0 | REV. NO. 9 |
| | PAGE 7 OF 10 | |
| | EFFECTIVE DATE 12/30/94 | |

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 quality-related work. These procedures provide for training in the principles and techniques of the activity involved and for maintenance of proficiency of personnel by retraining, re-examining, and/or recertifying to an extent commensurate with the safety significance of the activity. The procedures address documentation of:

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.

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|---|----------------------------------|---------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>PROGRAM DESCRIPTION</p> | <p>NUMBER</p> <p>Chapter 2.0</p> | <p>REV. N.O.</p> <p>9</p> |
| | <p>PAGE 8 OF 10</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |

5.11.2 The OQAP identifies activities and establishes requirements for procedures which identify, report, and verify the resolution of safety-related 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 Executive Vice President and General Manager, Nuclear for resolution.

QA-027

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.

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, performance monitoring, assessments/evaluations, NDE, and inspections of the operating plant and of the interfacing organizations' quality-related activities.

QA-027

5.13.2 The results of the quality overview activities are presented in a periodic report to the Executive Vice President and General Manager, Nuclear.

QA-027

| | | |
|---|----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>PROGRAM DESCRIPTION</p> | <p>NUMBER</p> <p>Chapter 2.0</p> | <p>REV. NO.</p> <p>9</p> |
| | <p>PAGE 9 OF 10</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |
| | | |

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 Executive Vice President and General Manager, Nuclear for his review and/or action.

5.13.4 STPEGS may use the services of architect-engineer 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.

QA-027

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.

| | | |
|---|----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>PROGRAM DESCRIPTION</p> | <p>NUMBER</p> <p>Chapter 2.0</p> | <p>REV. NO.</p> <p>9</p> |
| | <p>PAGE 10 OF 10</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |

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.

7.0 ATTACHMENTS

7.1 None

DA-025
DA-027

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|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN QUALITY ASSURANCE OVERVIEW ACTIVITIES | NUMBER Chapter 15.0 | REV. NO. 5 |
| | PAGE 1 OF 7 | |
| | EFFECTIVE DATE 12-30-94 | |

QA-027

1.0 PURPOSE

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

QA-027

2.0 SCOPE

2.1 This chapter provides for implementing a program of independent overview activities which includes audits, assessments, evaluations, performance monitoring, and surveillances to ensure the requirements of the Operations Quality Assurance Program are being properly implemented.

QA-027

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

- 4.1 UFSAR Table 3.12-1
- 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

QA-027

5.0 REQUIREMENTS

5.1 Independent Overview Activities

5.1.1 Procedures shall be developed to control independent overview activities. These activities include, but are not limited to, audits, assessments, evaluations, performance monitoring, and surveillances. These activities shall be used to observe and verify that activities are accomplished in accordance with prescribed requirements.

QA-027

| | | |
|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN QUALITY ASSURANCE OVERVIEW ACTIVITIES | NUMBER Chapter 15.0 | REV. NO. 5 |
| | PAGE 2 OF 7 | |
| | EFFECTIVE DATE 12-30-94 | |

5.2 Audits

5.2.1 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:

- 5.2.1.1 Operation, maintenance, and modifications
- 5.2.1.2 Preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings
- 5.2.1.3 Material and special process control
- 5.2.1.4 Indoctrination and training programs
- 5.2.1.5 Implementation of operating and test procedures
- 5.2.1.6 Calibration of measuring and test equipment
- 5.2.1.7 Corrective action and nonconformance control
- 5.2.1.8 Performance of the plant staff, including training records
- 5.2.1.9 Plant inspection activities

5.2.2 Qualified personnel assigned auditing responsibilities shall be independent of any direct responsibility for the performance of the activities which they audit; shall be experienced or trained commensurate with the scope, complexity, or special nature of the activities to be audited; and shall be qualified in accordance with the requirements of Reference 4.2.

DA-027

| | | |
|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN QUALITY ASSURANCE OVERVIEW ACTIVITIES | NUMBER Chapter 15.0 | REV. NO. 5 |
| | PAGE 3 OF 7 | |
| | EFFECTIVE DATE 12-30-94 | |

5.2.2.1 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.

QA-027

5.2.2.2 Other qualified personnel may assist in the conduct of audits, such as technical specialists or management representatives.

5.2.3 Internal Audits

5.2.3.1 Internal audits shall be conducted by the Quality Department and performed with a frequency commensurate with their safety significance, past performance and regulatory requirements.

QA-025

5.2.3.2 Review of the audit program shall be performed at least semiannually by the Nuclear Safety Review Board or by a management representative to verify that audits are being accomplished in accordance with the requirements of the QA Program.

QA-027

5.2.3.3 Audit results shall be reviewed periodically by the Quality organization for quality trends and overall audit program effectiveness. The results of these reviews shall be reported to appropriate management in periodic summary reports.

| | | |
|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN QUALITY ASSURANCE OVERVIEW ACTIVITIES | NUMBER Chapter 15.0 | REV. NO. 5 |
| | PAGE 4 OF 7 | |
| | EFFECTIVE DATE 12-30-94 | |

5.2.3.4 Audited organizations are responsible for providing timely corrective action including action to prevent recurrence for programmatic problems identified by an audit.

5.2.4 Supplemental audits shall be conducted when:

5.2.4.1 Significant changes are made to the quality assurance program.

5.2.4.2 It is necessary to determine the root cause of problem areas which may impact the effectiveness of the quality assurance program.

5.2.4.3 A systematic, independent assessment of program effectiveness is necessary.

5.2.4.4 Requested by appropriate management.

5.2.5 Audit implementation shall include the following:

5.2.5.1 Written notification to the audited organization of the audit, if an announced audit.

5.2.5.2 Development of an individual audit plan/scope. The audit plan and any necessary reference documents shall be available to the audit team members.

5.2.5.3 A pre-audit and post-audit conference with responsible organizational management.

5.2.5.4 Use of a checklist or procedure as a guide during the performance of the audit.

5.2.5.5 Identifying and documenting audit deficiencies.

5.2.5.6 Audit reports shall be prepared and submitted to the audited organization within thirty days after the post-audit conference. The audit report shall address those items required by Reference 4.1.

QA-027

QA-025

| | | |
|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN QUALITY ASSURANCE OVERVIEW ACTIVITIES | NUMBER Chapter 15.0 | REV. NO. 5 |
| | PAGE 5 OF 7 | |
| | EFFECTIVE DATE 11-30-94 | |

- 5.2.5.7 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.
- 5.2.5.8 Evaluation of corrective action for deficiencies and follow-up verification as appropriate.

5.3 Surveillance/Quality Performance Monitoring

- 5.3.1 Procedures and/or instructions shall be developed to control surveillance/quality performance monitoring activities. Surveillance/quality performance monitoring activities shall be used to observe and verify that activities are accomplished in accordance with prescribed procedures.
- 5.3.2 Surveillance/quality performance monitoring activities will be performed on both units during refueling outages, startup activities, and normal and off-normal operational activities. Areas to be monitored will be determined based on safety significance, past performance, regulatory requirements, and customer request.
- 5.3.3 The frequency of site surveillance/quality performance monitoring activities is based upon the complexity of the activity, importance of the activity, and severity level of conditions noted during previous overview activities.
- 5.3.4 Surveillance/quality performance monitoring results shall be documented and a summary shall be prepared and transmitted to responsible management.

QA-027

| | | |
|--|-----------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN QUALITY ASSURANCE OVERVIEW ACTIVITIES | NUMBER Chapter 15.0 | REV. NO. 5 |
| | PAGE 6 OF 7 | |
| | EFFECTIVE DATE 12-30-94 | |

5.4 Assessments/Evaluations

5.4.1 Assessments are conducted annually in accordance with written procedures to assess Nuclear Assurance & Licensing's implementation of the Operations Quality Assurance Program.

5.4.1.1 These assessments will be conducted by organizations independent of the activities performed to assure the HL&P OQAP is being properly implemented.

5.4.1.2 The Nuclear Safety Review Board shall define the scope of the assessment and determine the schedule.

5.4.1.3 The results of these assessments will be transmitted to the Executive Vice President and General Manager, Nuclear.

5.4.2 Other assessments/evaluations may be performed to verify activities are accomplished in accordance with applicable requirements and prescribed procedures.

5.4.2.1 These assessments/evaluations will be performed on areas based on their safety significance, past performance, regulatory requirements, and customer request.

5.4.2.2 Assessment/evaluation results shall be documented and transmitted to appropriate management.

5.4.3 Assessments and audits may be interchangeable provided the scope is appropriate and approved by the Director, Quality.

5.5 An approved overview plan shall be issued annually to include:

5.5.1 Activities/organizations to be overviewed.

5.5.2 Time frame in which the overview activity will be conducted.

QA-027

QA-025

| | | |
|--|-----------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN QUALITY ASSURANCE OVERVIEW ACTIVITIES | NUMBER Chapter 15.0 | REV. NO. 5 |
| | PAGE 7 OF 7 | |
| | EFFECTIVE DATE 12-30-94 | |

5.6 Nonconforming equipment, components, parts, materials, activities or documentation identified during an independent overview activity shall be documented in accordance with Reference 4.4.

5.7 Personnel performing independent overview activities shall be trained and qualified in accordance with Reference 4.2.

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 4.5.

7.0 ATTACHMENTS

7.1 None

DA-027

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| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN NUCLEAR FUEL MANAGEMENT | NUMBER | REV. NO. |
| | Chapter 16.0 | 5 |
| | PAGE 1 OF 4 | |
| EFFECTIVE DATE | | 12/30/94 |

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 REFERENCES

- 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 RESPONSIBILITIES

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

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|--|----------------------------|------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN NUCLEAR FUEL MANAGEMENT | NUMBER Chapter 16.0 | REV. NO. 5 |
| | PAGE 2 OF 4 | |
| | EFFECTIVE DATE 12/30/94 | |

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 REQUIREMENTS

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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|--|--------------|-------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN NUCLEAR FUEL MANAGEMENT | NUMBER | REV. NO. |
| | Chapter 16.0 | 5 |
| | PAGE 3 OF 4 | |
| EFFECTIVE DATE | | 12/30/94 |

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

| | | |
|--|--------------|-------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN NUCLEAR FUEL MANAGEMENT | NUMBER | REV. NO. |
| | Chapter 16.0 | 5 |
| | PAGE 4 OF 4 | |
| EFFECTIVE DATE | | 12/30/94 |

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

120-18

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|--|--------------------------------|----------------------|
| SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION OPERATIONS QUALITY ASSURANCE PLAN ASME CODE SECTION XI - INSERVICE INSPECTION AND TESTING | NUMBER Chapter 18.0 | REV. NO. 5 |
| | PAGE 1 OF 3 | |
| | EFFECTIVE DATE 12/30/94 | |

1.0 PURPOSE

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 REFERENCES

- 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 RESPONSIBILITIES

- 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 appropriate quality overview activities, interfacing with the Authorized Inspection Agency, and performance of nondestructive examinations as requested by Nuclear Engineering.

04-027

| | | |
|---|-----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>ASME CODE SECTION XI - INSERVICE INSPECTION AND TESTING</p> | <p>NUMBER</p> <p>Chapter 18.0</p> | <p>REV. NO.</p> <p>5</p> |
| | <p>PAGE 2 OF 3</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |

6.0 REQUIREMENTS

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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|---|-----------------------------------|--------------------------|
| <p>SOUTH TEXAS PROJECT ELECTRIC GENERATING STATION</p> <p>OPERATIONS QUALITY ASSURANCE PLAN</p> <p>ASME CODE SECTION XI - INSERVICE INSPECTION AND TESTING</p> | <p>NUMBER</p> <p>Chapter 18.0</p> | <p>REV. NO.</p> <p>5</p> |
| | <p>PAGE 3 OF 3</p> | |
| | <p>EFFECTIVE DATE 12/30/94</p> | |

- 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 Houston Lighting & Power.
- 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.

RA-025

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