

APR 1 1985

Docket Nos.: 50-498
and 50-499

Mr. J. H. Goldberg
Group Vice President, Nuclear
Houston Lighting and Power Company
Post Office Box 1700
Houston, Texas 77001

Dear Mr. Goldberg:

Subject: Request for Additional Information - Quality Assurance for
the South Texas Project

Enclosed are questions on the subject of Quality Assurance for the
South Texas Project based on review of the FSAR through Amendment 43.
The questions are numbered 260.48 through 260.57. Three of the questions,
260.48, 260.49 and 260.55 are differentiated from the others by our
asterisk, the significance of which is to denote that they arise based
on criteria in the Standard Review Plan NUREG-0800. The rest of the
questions are based on NUREG-75/087, which is the Standard Review Plan
applicable to South Texas.

Please contact Mr. Prasad Kadambi at (301) 492-7272 if you have any further
questions.

Sincerely,

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George W. Knighton, Chief
Licensing Branch No.3
Division of Licensing

Enclosure:
As stated

cc w/enclosure:
See next page

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~~Docket File 50-498/499~~

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REQUEST FOR ADDITIONAL INFORMATION
QA FOR SOUTH TEXAS PROJECT UNITS 1 AND 2

260. QA Branch
- 260.48* In FSAR Amendment 42, the response to Question 260.10N refers to Section 17.2.3. Section 17.2.3 does not appear to address the assurance of geometric and functional compatibility or compatibility with processes and environment during the operations phase. Clarify.
- 260.49* In FSAR Amendment 42, the response to Question 260.11N refers to Section 17.2.3. Section 17.2.3 does not appear to address checking drawings to verify dimensional accuracy and completeness. Clarify.
- 260.50 In FSAR Amendment 42, the response to Question 260.35 refers to Section 17.2.2.11. It is assumed that this response related to FSAR Section 17.2.2.10. Section 17.2.2.10 indicates that changes to the QA program, as described in the FSAR, that decrease the level of commitment will be processed in accordance with 10 CFR 50.54(a). Changes should be processed in accordance with 10 CFR 50.54(a) whether or not they decrease the level of commitment. Revise FSAR Section 17.2.2.10 accordingly or justify not doing so.
- 260.51 In FSAR Amendment 42, the response to Question 260.36 states that the question will be answered in a later amendment. Amendment 43 appears to answer this question in note 32 to FSAR Table 3.12-1. This note states that some specific personnel will be qualified "under the guidelines of ANSI N45.2.6-1978, rather than RG 1.8." This would be acceptable if the reference to ANSI N45.2.6-1978 was changed to the regulatory guide endorsing that standard, i.e., RG 1.58, Revision 1 dated September 1980. Change this reference or justify not doing so. Also, it appears that the commitment to RG 1.8 in FSAR Table 3.12-1 should also refer to note 32. Clarify.
- 260.52 FSAR Amendment 43 deleted a number of referenced in Table 3.12-1 to Chapter 17. Explain the significance of these deletions. Also, footnote 39 in FSAR Table 3.12-1 (Amendment 43) refers to RG 1.39. It appears this reference should be to RG 1.144. Clarify.
- 260.53 Questions 260.33 and 260.47 address the scope of the HL&P QA program during the operations phase of the South Texas Project. The items listed below, numbered as in 260.33, reflect staff positions which should be addressed by HL&P.
- a.17 Quality assurance for the piping, supports and valves in the cooling loops of the spent fuel pool cooling and cleanup system is given by a dash in the Quality Assurance Column, indicating that the QA requirements of 10 CFR 50, Appendix B, are not mandatory. The staff position is that the pertinent provisions of Appendix B should be applied to the spent fuel pool cooling system during the operation phase. Commit to meet this position or justify not doing so.
- a.28 The response to this item on page Vol. 2, Q&R 17.2-47N per Amendment 42 is acceptable. It appears to have been garbled in note 14 of Table 3.2.A-1 on page 3.2-29a. Clarify.

- e.4 The response to this item on page Vol. 2 Q&R 17.2-48N per Amendment 42 is acceptable as it addresses the PASS hardware. Identify what QA measures will be applied to the post-accident sampling capability during the operations phase.
- e.5 The response to this item on page Vol. 2 Q&R 17.2-48 per Amendment 42 differentiates between the application of 10 CFR 50 Appendix B to the pressurizer PORV status indicators and the pressurizer safety relief valve status indicators. Item IID3 of NUREG-0737 makes no such differentiation, and the staff position is that the pertinent provision of Appendix B should be applicable to the status indicators of both types of valves during the operations phase. Provide such a commitment or justify not doing so.

260.54 The response to Question 260.45N is acceptable in FSAR Amendment 42. However, the fact that "the applicable QA program for operations (for equipment identified in Notes 3, 4, 6, 23, and 24 of FSAR Table 3.2.B-1) is as discussed in Section 17.2" should be clarified in Table 3.2.B-1. So clarify Table 3.2.B-1 or justify not doing so. This clarification is also required of Table 3.2.B-2 since one set of notes applies to both tables.

260.55* Until Amendment 42, FSAR section 17.2.6.2 included the following commitment:

Maintenance, modification and inspection procedures shall be reviewed by the responsible QA organization to determine:

- a. The need for inspection, the identification of inspection personnel and the documentation of inspection results.
- b. That necessary inspection requirements, methods, and acceptance criteria have been identified.

Reinstate this commitment or justify not doing so:

260.56 The response to question 421.6 refers to FSAR section 17.2.2.6 and its discussion of QA indoctrination sessions. FSAR Amendment 42 revised section 17.2.2.6 such that the QA indoctrination program is not discussed. Reinstate the prior commitments for QA indoctrination or justify not doing so.

260.57 The response to question 421.37 indicates that FSAR section 17.2.15.1 has been revised to require engineering evaluation of "use-as-is" and "repair" dispositions before the disposition is initiated. It appears that FSAR Amendment 42 deleted the underlined commitment. Reinstate this commitment or justify not doing so.