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 (STP).

2.0 SCOPE

2.1 STP Nuclear Operating Company (STPNOC), as licensee, has the Quality responsibility for design, engineering, procurement, fabrication, modification, maintenance, repair, in-service inspection, refueling, testing, and operation of the STP. QA-034, 037

2.2 The requirements of this chapter are applicable for structures, systems, and components designated as "Full", "Targeted", or "Basic".

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 None

5.0 RESPONSIBILITIES

5.1 The STPNOC is comprised of Nuclear Generation, Nuclear Engineering & Technical Services, Plant Services, Nuclear Safety and Quality Concerns Program and Business Systems. The heads of these groups report to the President and Chief Executive Officer. QA-034, 037

5.1.1 The President and Chief Executive Officer has overall responsibility for the implementation of the Operations Quality Assurance Program and approving the Operations Quality Assurance Plan (OQAP) and revisions thereto.

5.1.2 The Vice President, Nuclear Generation is responsible for implementing quality program requirements applicable to staffing STP with qualified personnel and acquiring and coordinating the assistance of internal and external organizations for the testing, operation, modification, maintenance, and radiological monitoring functions of STP.

5.1.2.1 The Plant Manager, Unit 1; Plant Manager, Unit 2; Assistant to the Vice President; Manager, Generation Support; Manager, Outage and Installation; and Manager, Metrology & Radiological Laboratory report to the Vice President, Nuclear Generation. QA-035

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 STP.

5.1.3 The Vice President, Nuclear Engineering & Technical Services (NE&TS) 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.

The Vice President, NE&TS is responsible for the development, maintenance, and independent verification of implementation of the STP Quality 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. QA-037

The Vice President, NE&TS is responsible for implementing quality program requirements applicable to STP corrective action, licensing, and Independent Safety Engineering Group activities, and administration of the Nuclear Safety Review Board (NSRB).

The Vice President, NE&TS 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 Quality activities without undue pressure of cost or schedule.

5.1.3.1 The Manager, Design Engineering; Manager, Systems Engineering; Project Manager, Steam Generator Replacement Project; Assistant to the Vice President; Director, Nuclear Fuel and Analysis; Director, Quality; Manager, Operating Experience; Director, Nuclear Licensing; and Manager, Risk Management & Industry Relations report to the Vice President, NE&TS.

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5.1.3.2 The NSRB administratively reports to the Manager, Risk Management & Industry Relations. The NSRB functionally reports directly to and advises the President and Chief Executive Officer.

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

5.1.3.4 The Director, Quality, at his discretion, reports directly to the President and Chief Executive Officer.

5.1.3.5 The Director, Quality has the authority to stop work for cause. This authority has been granted by the President and Chief Executive Officer. The Quality organization, including the inspection staff, is based upon the anticipated Quality involvement in operations, modification, and maintenance activities. QA-037

5.1.3.6 The Manager, Risk Management & Industry Relations is responsible for activities related to the Comprehensive Risk Management Program, including oversight of Probabilistic Safety Assessment activities. The Manager, Risk Management & Industry Relations serves as the Graded Quality Assurance Expert Panel chairperson. QA-037

5.1.4 The Vice President, Plant Services is responsible for implementing quality program requirements applicable to nuclear training, information systems, emergency response, records management and administration, and procurement and material control for STP. QA-034, 037

5.1.4.1 The Manager, Nuclear Training; Manager, Nuclear Information Systems; Manager, Emergency Response; Director, Records Management Systems and Administration; and Director, Nuclear Purchasing and Materials Management report to the Vice President, Plant Services. QA-034, 037

5.1.5 The Vice President, Business Systems is responsible for implementing quality program requirements applicable to the business systems unit. QA-034, 037

5.1.5.1 The General Manager, Human Resources; Manager, Planning and Controls; Manager, Plant Projects & Programs; and Manager, Nuclear Plant Protection report to the Vice President, Business Systems.

5.1.6 The Director, Nuclear Safety Quality Concerns Program (NSQP), is responsible for implementing quality program requirements applicable to the NSQP. QA-037

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 STP. 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 1 depicts the organizational structure of the STP 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 STP UFSAR Chapter 13.1.

7.0 DOCUMENTATION

7.1 None

8.0 ATTACHMENTS

8.1 Attachment 1 - STPNOC Organization QA-037

ATTACHMENT 1

STPNOC ORGANIZATION

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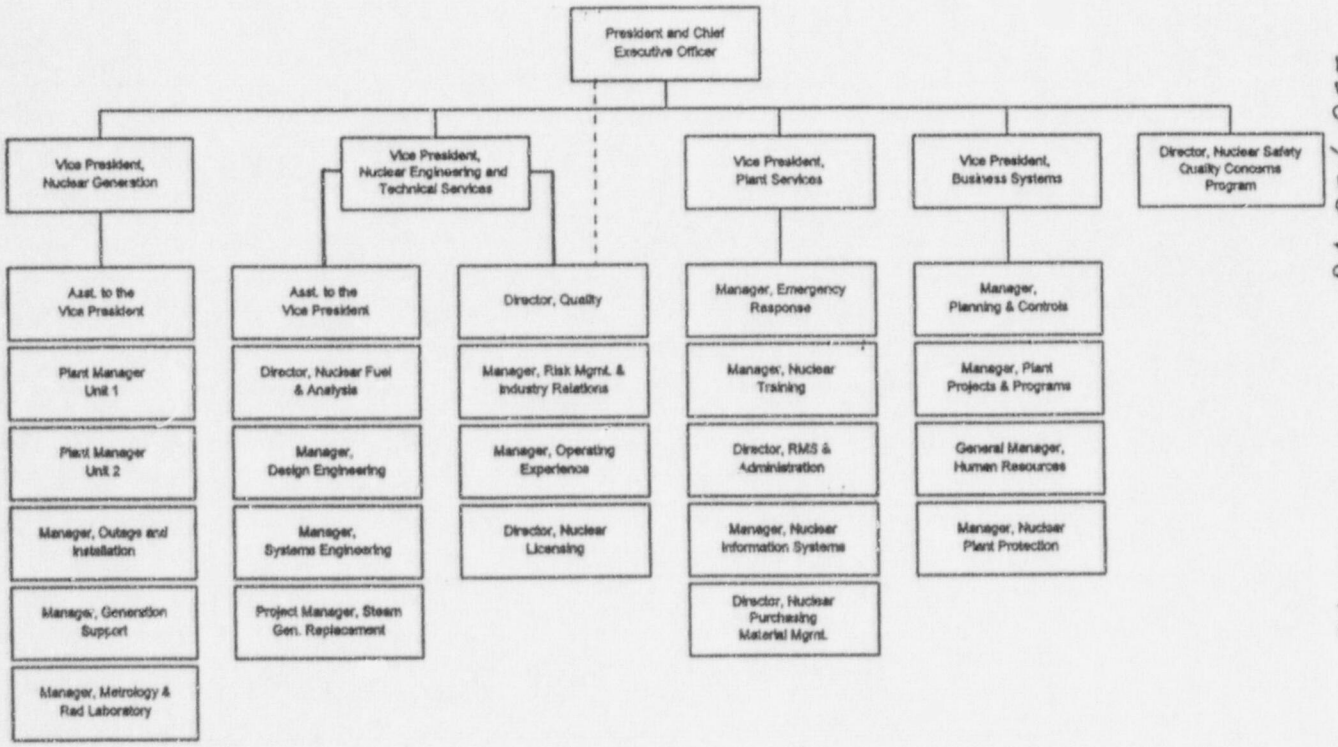

1.0 PURPOSE

1.1 The purpose of this chapter is to define criteria and establish administrative controls for implementation of the Quality Assurance (QA) Program for the South Texas Project Electric Generating Station (STP).

2.0 SCOPE

2.1 The QA Program is implemented and controlled in accordance with the Operations Quality Assurance Plan (OQAP) and is applicable to structures, systems, and components to an extent consistent with their importance to safety, and complies with the requirements of 10CFR50, Appendix B and other program commitments as appropriate.

2.2 The QA Program will also extend, as applicable and/or determined by STP management, to programs including 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 to quality-related areas as defined herein including 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.

3.0 DEFINITIONS

3.1 Comprehensive Risk Management - A process by which the change in risk to station personnel, the public's health and safety are evaluated as a result of changes in commitments, processes, activities, and human and equipment performance.

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3.2 Graded Quality Assurance - The process by which risk-based methodology [i.e., Probabilistic Safety Assessment (PSA)] and deterministic and performance-based information analyses are combined to establish appropriate levels of programmatic controls for SSCs and appropriate levels of first line and independent oversight needed to provide the necessary assurance that SSCs will operate safely.

3.3 Full program controls - The highest levels of controls and oversight, as prescribed in Table I to this chapter and throughout individual OQAP chapters.

3.4 Basic program controls - Good business practice/lower level of control and oversight, as prescribed in Table I to this chapter and throughout individual OQAP chapters.

3.5 Targeted program controls - Selected program controls applied to certain non-safety and/or quality related structures, systems, and components (SSCs) and site programs.

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

4.6 10CFR50.54(a)

5.0 REQUIREMENTS

5.1 General Program Requirements

5.1.1 The OQAP shall be prepared and maintained to prescribe the STP QA Program. The OQAP reflects the quality program policies to be implemented. The OQAP describes the organization and responsibilities for attainment of quality objectives and verification of conformance to established requirements. The QA Program shall be in effect throughout the operating life of the STP.

5.1.2 The President and Chief Executive Officer has overall responsibility for quality assurance. The Vice President, Nuclear Engineering & Technical Services (NE&TS), is responsible for the development and maintenance of the OQAP.

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5.1.3 The operations phase of the STP includes design, procurement, fabrication, repair, testing, operation, maintenance, refueling, inspection, independent oversight, modification, and other activities as discussed Table I to this chapter and throughout the OQAP. STP and its vendors are required, as appropriate, to comply with the criteria established by 10CFR50, Section 50.55a; 10CFR50, Appendix A, General Design Criterion (GDC) 1; 10CFR50, Appendix B, and 10CFR71, Sub-Part H (except design and fabrication of NRC certified radioactive waste shipping casks).

STP will implement, as specified, the Regulatory Guides (RG) and implementing American National Standards Institute (ANSI) standards contained in Table I of this chapter.

5.1.4 STP shall maintain the OQAP as an effective and meaningful document to provide programmatic direction for the station. Changes to the OQAP shall be accomplished as prescribed by 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.

5.2 Organizational Independence

5.2.1 The reporting arrangement utilized by the Quality organization ensures that those personnel performing independent oversight have the organizational freedom to:

5.2.1.1 Identify quality problems.

5.2.1.2 Initiate, recommend, or provide solutions.

5.2.1.3 Verify implementation of solutions.

5.2.2 Personnel verifying compliance with quality requirements do not have direct responsibility for the performance of or directly supervise the activity being verified.

5.3 Graded Quality Assurance

5.3.1 Graded Quality Assurance (GQA) is fundamental to the STP QA Program. It is described in more detail in the implementing procedure for the STP Comprehensive Risk Management (CRM) Program.

5.3.2 GQA is a process by which risk-based methodology [i.e., Probabilistic Safety Assessment (PSA)], deterministic insights, and performance-based information are combined and analyzed to determine what levels of programmatic controls are needed for structures, systems, and components (SSCs) and what levels of first line and independent oversight are needed to provide assurance that items will operate safely and activities are accomplished as prescribed.

5.3.3 Selected systems are evaluated, at the component level, by a cross-discipline Expert Panel comprised of high level station management. Initial evaluations are performed by the Working Group. QA-032

5.3.4 These recommendations are developed in consideration of systems' missions, components' contribution to core damage frequency and risk achievement, components' critical attributes (needed to support system mission), performance, regulatory/QA requirements, and other deterministic considerations as prescribed in the Comprehensive Risk Management procedures.

5.3.5 Program control recommendations are developed by the Working Group and ultimately approved by the Expert Panel and forwarded to the site for implementation. Controls are implemented in three graded applications (i.e., "Full", "Basic", and "Targeted"). QA-032

5.3.6 "Full" program controls are applied to safety-related SSCs categorized as being "high" safety significant/risk important. These "Full" levels of controls and oversight are designed to provide a high degree of confidence that SSCs perform safely and activities are performed as expected. Table I to the OQAP chapter prescribes the program commitments applicable to "Full" program activities.

5.3.7 "Basic" program controls are applied to safety-related SSCs categorized as "medium" or "low" safety significant/risk important. These are lower levels of control and oversight, designed to maintain/preserve those identified critical attributes of SSCs needed to support systems' critical functions. These controls are intended to reflect economical and efficient business practices. Table I to the OQAP chapter prescribes the program commitments applicable to "Basic" program activities.

5.3.8 "Targeted" program controls are applied to non-safety related SSCs, for which 10CFR50, Appendix B is not applicable, categorized as "high" or "medium" safety significant/risk importance. Specific program controls consistent with applicable portions of the "full" and "basic" program controls are applied to those items in a selected manner, "targeted" at those characteristics or critical attributes that render the SSC significant or important. QA-033

5.3.9 Components that are highly reliable, yet whose failure would result in a significant increase in risk, will receive Full program coverage, or will be evaluated based on their risk importance to ensure that Full program controls are applied to their critical attributes. QA-032

5.3.10 SSCs governed by the OQAP shall retain "Full" program coverage until such time as prescribed risk-informed, performance-based analyses are completed and approved, and they are placed into other program categories (i.e., "Targeted" or "Basic") as appropriate.

5.3.11 A vital element of the GQA program is the "feedback" loop. On a periodic basis, and as prescribed in the Comprehensive Risk Management procedure, the GQA Working Group and Expert Panel shall review any changes to the PSA information and performance/operating experience that could result in recategorization of an SSC. These reviews are also used to assess the effectiveness and appropriateness of in-place quality program controls. Adjustments shall be made as determined necessary. Those components for which an increase in failure rates results in a significant increase in risk will have Full program controls established. 94-032

5.4 Delegation of QA Functions

5.4.1 The OQAP may be executed in whole or part by subcontract personnel. However, STP will retain responsibility for the total quality assurance program, and Quality organization personnel will perform appropriate oversight activities of subcontracted activities.

5.5 Identification of Safety Significant Structures, Systems, and Components

5.5.1 The program described herein is applied to activities affecting the safety 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 structures, systems, and components controlled are listed in UFSAR Section 3.2, along with their associated fire protection systems. UFSAR Section 3.2 also identifies those structures, systems, and components which may not represent a safety significant/risk important concern but to which the STP OQAP is applied.

5.5.2 The fire protection QA Program is part of the overall STP Operations QA Program. Fire protection QA Program criteria are implemented as part of the Operations QA Program.

5.5.3 Expendable or consumable items necessary for the functional performance of 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.

5.6 QA Program Documents

5.6.1 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 level of 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 significance by individuals qualified to do so.

5.7 Personnel Indoctrination and Training

5.7.1 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 STP personnel are described in UFSAR Section 13.2. 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.

5.8 Policies and Goals

5.8.1 STP policy is to assure that the design, procurement, construction, testing, and operation of the STP are in conformance with specifications, procedures, codes, commitments and Nuclear Regulatory Commission (NRC) regulations. The responsibility of each organization supporting the STP is to ensure that the requirements stated in this QA Program are incorporated into procedures. Adherence to those procedures is mandatory for all STP organizations and contractors or vendors providing items or services covered by the QA Program.

5.8.2 The OQAP identifies activities and establishes requirements for procedures which identify, report, and verify the resolution of 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, the Vice President, Nuclear Engineering & Technical Services or Director, Quality shall present the problem to the President and Chief Executive Officer for resolution.

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5.9 Control of Activities

5.9.1 The OQAP requires Quality department 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.

5.9.2 STP personnel attend planning, scheduling, and status meetings as necessary to assure adequate quality coverage and program application exists.

5.10 Management Review

5.10.1 The implementation of both line and OQAP requirements shall be verified through independent oversight activities. The Quality organization shall conduct independent oversight activities of the operating plant and of the interfacing organizations' activities.

5.10.2 Independent oversight of implementation of the OQAP is conducted under the cognizance of the Nuclear Safety Review Board and results are transmitted to appropriate line and senior management, including the President and Chief Executive Officer for review and/or action. QA-034

5.10.3 STP may use the services of architect-engineer firms, Nuclear Steam Supply System (NSSS) suppliers, fuel fabricators, constructors, and others which provide or augment STP efforts during operations. As applicable, the QA programs of such contractors or consultants shall be subject to review, evaluation, and acceptance by the Quality organization before initiation of activities affected by the program.

5.11 Computer Code Programs

5.11.1 The development, maintenance, and use of computer code programs will be controlled. Prior to use of a computer code program, the appropriateness of the program shall be verified. In addition, all such programs shall be appropriately certified for use.

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 Table I - Program Commitments

TABLE I

PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
R.G. 1.8, rev. 1 (9/75)	No exceptions taken.	No exceptions taken.
ANSI N18.1, 1971	4.2.2 - The Operations Manager requirements regarding holding a Senior Reactor Operator license are met by the Unit Operations Managers.	Same as full.
R.G. 1.28, rev. 0 (6/72)	This R.G. is not applicable to operations phase activities.	Same as full.
ANSI N45.2, 1971	This standard is not applicable to operations phase activities.	Same as full.
R.G. 1.33, rev. 2 (2/78)	C.2 - the specific revisions of the listed standards to which STP is committed are in this table and are not necessarily the "latest" revision.	Same as full.
	C.4 - Chapter 15.0 of the STP OQAP describes the audit program at STP that meets the intent of R.G. 1.33, rev. 2, position C.4 regarding frequency of audits	Same as full.
	C.4.a.b.c. - STP performs these audits in accordance with a nominal biennial frequency.	Same as full.
ANSI N18.7 - 1976/ ANS 3.2	3.4.2 - refer to R.G. 1.8 regarding Operations Manager holding a Senior Reactor Operator license.	Same as full.
		3.4.2 refer to R.G. 1.5.8 regarding use of personnel not qualified in accordance with ANSI N45.2.6.
	4.5 - refer to R.G 1.33 coverage regarding audit frequency.	Same as full.
	5.2.6 (5th paragraph) - independent verification may be concurrent with (same time as) work performance.	Same as full.
	5.2.7 (1st paragraph) - STP will use current approved design bases as opposed to original design bases.	Same as full.

TABLE I

PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N18.7/ANS 3.2 (cont'd)		5.2.7 - STP will perform inspection as deemed necessary, based on the relative complexity of the work.
	5.2.7.1 (5th paragraph) - STP takes exception to use of the word "promptly" with regard to determining, evaluating and recording the causes of malfunctions. The STP Corrective Action Program includes the elements with regard to timeliness of action associated with causal analyses.	Same as full.
		5.2.7.2 - refer to table coverage of ANSI N45.2.11, 1974.
		5.2.13 (1st paragraph) - refer to table coverage of ANSI N45.2.13, 1976.
		5.2.13.1 (1st paragraph) - refer to table coverage of ANSI N45.2, 1971.
		5.2.13.4 (5th paragraph) - refer to table coverage of ANSI N45.2.2, 1972.
	5.2.15 (4th paragraph) - Chapter 8.0 of the OQAP describes the requirements for control and issuance of documents, which meets the intent of R.G. 1.33, rev. 2. The intent of the biennial review is accomplished by other controls that assure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, regulatory requirements, industry experience and other conditions that may impact plant procedures.	Same as full.
		5.2.17 (3rd paragraph) - STP may not implement the requirement for conduct of inspections in a manner similar to that associated with construction phase activities (i.e., regarding use of personnel not qualified to ANSI N45.2.6).

TABLE I

PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
R.G. 1.38, rev. 2 (5/77)	No exceptions taken.	No exceptions taken.
ANSI N45.2.2, 1972	2.4 - Audit personnel are qualified in accordance with STP's commitment to R.G. 1.146/ANSI 45.2.23.	Same as full. 2.4 - Offsite oversight of vendors of items in the Basic category will only be performed as deemed necessary.
R.G. 1.58, rev. 1 (9/80)	C.2 - STP is committed to ASNT-TC-1A, 1980. STP treats the recommendations ("should") of the 1980 edition as requirements ("shall").	Same as full.
ANSI N45.2.6, 1978		1.2 (1st paragraph) - With the exception of receipt inspection, personnel may perform inspections, examinations and tests provided they are experienced, task qualified journeymen, or supervisors, who did not perform or directly supervise the activity being inspected, examined or tested. These individuals shall also receive training to the Quality organization's inspection procedure/ process/methods in accordance with a Quality approved training program; and Quality will provide periodic oversight of the inspection activities.
	1.2 (3rd paragraph) - refer to table coverage of R.G. 1.28.	Same as full.
	1.4.4 - refer to table coverage of R.G. 1.74/ANSI N45.2.10.	Same as full.

TABLE I

PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
R.G. 1.64, rev. 2 (6/76)	No exceptions taken.	C.2 - STP may implement the requirement regarding design verification as prescribed in ANSI N45.2.11, 1974, 6.1, second paragraph/second sentence, as opposed to R.G. wording.
ANSI N45.2.11, 1974	No exceptions taken.	3.2 (1st paragraph) - STP will require personnel to consider items 1 through 28, but a documented checklist may not be required. 6.3 - Verification and checking of design may be accomplished through supervisory or management review/approval as provided for in 6.1 Personnel will be required to consider items 1 through 19, but a documented checklist may not be required.
R.G. 1.74 (2/74)	Not applicable to STP. STP uses ANSI/ASME NQA-1-1983 for Quality Assurance Terms and Definitions.	Same as full.
ANSI N45.2.10, 1973	Same as R.G. 1.74 above.	Same as full.
R.G. 1.123, rev. 1 (7/77)	C.6.b.and e. - The referenced section of ANSI N45.2.13 will be implemented as written.	C.6 - The referenced sections of ANSI N45.2.13 will be implemented as written. STP will not use 10.3.3 of ANSI N45.2.13, 1976 as a sole basis for acceptance of items.
ANSI N45.2.13, 1976	Various sections refer to ANSI N45.2. Refer to table coverage of R.G. 1.28 and ANSI N45.2.	Same as full.

TABLE I

PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.13, 1976 (cont'd)	5.3.and 5.4 - Provisions are established for, in special cases and with management approval, completion of these activities after award of contract.	Same as full.
		7.2.1, 7.3.1 - These activities will only be implemented as deemed necessary.
	9.0 - This section will be implemented based on the scope, complexity and safety significance of the items being procured.	Same as full.
		10.3.1 - This section will only be implemented as deemed necessary.
		12 - This section will only be implemented as deemed necessary for audits of suppliers.
R.G. 1.144, rev. 1 (9/80)	C.1 - refer to table coverage of R.G. 1.28 and ANSI N45.2. refer to table coverage of R.G. 1.74 and ANSI N45.2.10	Same as full.
	C.3.a(1) - refer to table coverage of R.G. 1.33 regarding audit frequency.	Same as full.
		c.3.b STP will audit vendors only as deemed necessary.
		STP will perform biennial evaluations.
ANSI N45.2.12, 1977	No exceptions taken.	STP will audit vendors only as deemed necessary. These audits will be conducted as unplanned/unscheduled audits.
R.G. 1.146, rev. 0 (8/80)	C.1 - refer to table coverage of R.G. 1.28 and ANSI N45.2. refer to table coverage of R.G. 1.74 and ANSI N45.2.10	Same as full.

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TABLE I

PROGRAM COMMITMENTS

R.G./ANSI STANDARD	FULL PROGRAM	BASIC PROGRAM
ANSI N45.2.23, 1978	1.2 - refer to table coverage of R.G. 1.28.	Same as full.
	1.4 - refer to table coverage of R.G. 1.74.	Same as full.
	2.21 - refer to table coverage of R.G. 1.28.	Same as full.
	2.3.3.1 - refer to table coverage of R.G. 1.28.	Same as full.

For Regulatory Guides addressed by the table, and unless specific clarification or exception is indicated, STP will implement the Regulatory Guide positions, including recommendations.

For ANSI Standards addressed by this table, and unless specific clarification or exception is indicated, STP will treat ANSI requirements (i.e., "shall") as such -- except in instances where the standard itself provides options or requires a graded approach -- this notwithstanding the general applicability statements found in many standards (i.e., section 1.0)

1.0 PURPOSE

1.1 The purpose of this chapter is to establish the requirements for procurement of items and services for the South Texas Project Electric Generating Station (STP).

2.0 SCOPE

2.1 This chapter applies to the procurement of items and services for use at STP which are subject to the controls of this Quality program. These activities include procurement document control, bid evaluation, vendor evaluation, verification of vendor activities and receiving inspection.

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 10CFR50, Appendix B

4.2 10CFR21, Reporting of Defects and Noncompliance

4.3 OQAP Chapter 2.0, Table I

4.4 EPRI NP-5652 (NCIG-07), Guideline for the Utilization of Commercial Grade Items in Nuclear Safety Related Application

4.5 OQAP Chapter 4.0, Qualification, Training and Certification of Personnel

4.6 OQAP Chapter 13.0, Control of Conditions Adverse to Quality

4.7 OQAP Chapter 14.0, Records Control

4.8 Generic Letter 89-02, Actions to Improve the Detection of Counterfeit and Fraudulent Marketed Products

5.0 REQUIREMENTS

5.1 Procurement Document Preparation, Review and Control

5.1.1 Responsibility for procurement is a joint effort of all the departments within the STP Nuclear Operating Company (STPNOC). The department requesting the material or service provides technical content and quality requirements. Design Engineering/Nuclear Purchasing & Material Management is responsible to provide input to the requesting department on technical content and quality requirements, as requested. Quality will concur with all changes to quality requirements. 84-037

5.1.2 The sequence of preparation, review, approval, and issuance of procurement documents is generally as follows:

5.1.2.1 Purchase Requisitions

- Purchase requisition forms shall be used to initiate the procurement of materials, parts, components, and services. Procurement may be initiated by any STPNOC personnel. 84-037
- Purchase requisitions shall include material and component identification requirements, drawings, specifications, standards, inspection and test requirements, and special process instructions as appropriate.
- Purchase requisitions for materials, parts, components, or services shall be reviewed by the cognizant technical organization to verify that adequate technical and quality requirements have been specified.

- The reviews for technical and quality requirements shall be performed by someone other than the originator of the requisition. Quality will concur with all changes to quality requirements.

5.1.2.2 Purchase Orders and Contracts

- Purchase orders and contracts are prepared and issued by Nuclear Purchasing and Material Management and establish for the suppliers the technical and quality requirements which must be met.

- Purchase orders and contracts shall accurately reflect the technical and quality requirements established by the purchase requisition. If, during the bid negotiations with the supplier, it becomes necessary or commercially desirable to change the technical or quality requirements, such changes shall be presented for approval to the cognizant technical organization which approved the original requirements.

5.1.2.3 Change Controls

- Changes to procurement document quality and technical requirements shall require a review and approval equivalent to that of the original document. Commercial consideration changes not affecting the technical or quality requirements do not require review and concurrence by the originator.

5.1.3 For the procurement of spare or replacement parts, equipment, materials, and services, the quality and technical requirements shall be equal to or greater than the design basis requirements for the original part, equipment, materials or services; except where less stringent quality or technical requirements may be established based on specific evaluations and justification. The cognizant technical organization shall document such justification.

5.1.3.1 Items may be procured as Commercial Grade Items (CGIs) if a documented engineering evaluation indicates the CGI will provide equivalent performance. CGI dedication will comply with established procedures designed to satisfy the requirements of References 4.2 and 4.8.

5.1.3.2 The cognizant technical organization shall verify that quality requirements are correctly stated, verifiable, and controllable; that acceptance/rejection criteria are included; and that the documents have been prepared, reviewed, and approved in accordance with STP Quality Program requirements.

5.2 Procurement Document Content

5.2.1 Procurement document control measures shall assure that appropriate regulatory requirements, design bases, and other requirements are included in the procurement process. The following shall be included or invoked by reference in procurement documents as appropriate:

5.2.1.1 Applicable regulatory, code, and design requirements, including material and component identification requirements, drawings, specifications, standards, inspection and test requirements, special process

instructions and handling, preservation, cleaning, storage, packaging and shipping requirements. These requirements shall equal or exceed the original requirements (unless changed by established design control processes).

5.2.1.2 Extent that supplier QA program shall comply with 10CFR50, Appendix B or the QA program requirements of other nationally recognized codes and standards, as applicable; or for CGIs to be dedicated for safety related use by STPNOC based on the results of a survey of the vendor's controls, the vendor's STPNOC approved and/or surveyed program. QA-034, 037

5.2.1.3 Requirements for supplier documents, such as instructions, procedures, drawings, specifications, inspection and test records, and suppliers' QA records to be prepared, submitted, or be made available for review and/or approval by STP personnel.

5.2.1.4 Requirements for suppliers to maintain the status of required inspections or tests throughout the manufacturing process to preclude inadvertent bypassing of inspections and tests.

5.2.1.5 Requirements for STPNOC's right of access to suppliers' facilities and work documents for inspection and audit. QA-034

5.2.1.6 Requirements for extending applicable STP procurement requirements to lower-tier suppliers and subcontractors, including STPNOC's access to facilities and records. QA-034

5.2.1.7 Requirements for supplier reporting to STP nonconformances to procurement document requirements and conditions for their disposition.

5.2.1.8 Requirements for the retention, control, and maintenance of supplier QA records that are not maintained by STPNOC. Supplier-furnished records shall include: QA-034

- Documentation (e.g., certification) that identifies the purchased item and the specific procurement requirements (e.g., codes, standards, and specifications) met by the item.
- Documentation identifying any procurement requirements that have not been met.
- A description of those nonconformances from procurement requirements dispositioned "accept-as-is" or "repair".

5.2.1.9 Requirement for the supplier to submit a copy of its QA program description (does not apply for CGIs).

5.2.1.10 Requirements for the performance of maintenance and receipt inspection checks where applicable.

5.2.1.11 Applicability of 10CFR21 reporting requirements.

- The reporting requirements of 10CFR21 do not apply to vendors of CGIs to be dedicated for use by STPNOC. QA-034

5.3 Bid Evaluation

5.3.1 Bid Evaluations shall be performed to evaluate adherence to technical and quality assurance requirements.

5.4 Supplier Selection

5.4.1 Suppliers of items (for CGIs, when basis for dedication includes commercial grade survey) or services shall be required to submit copies of their QA program description for evaluation prior to the issuance of a purchase order or execution of a contract, and acceptability shall be documented. The process by which suppliers are judged as being a capable procurement source is described as follows:

5.4.1.1 Procurement source evaluation and selection involves Engineering & Technical Services, NPMM, and STP plant personnel, as appropriate. These organizations participate in the qualification evaluation of suppliers in accordance with written procedures.

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5.4.1.2 Measures for the evaluation and selection of procurement sources shall be specified in procedures and may vary depending upon the complexity and risk significance of the item or service. When procurement source evaluations are performed, the information to be considered shall include one or more of the following:

- Experience of users of identical or similar products of the prospective supplier, other utility or approved contractor audits/evaluations, audits/evaluations by cooperative utility groups, American Society of Mechanical Engineers (ASME) Certificates of Authorization, STP records accumulated in previous

procurement actions, and STP product operating experience may be used in this evaluation.When other utility, contractor or cooperative utility audits/evaluations are used, the documentation will be obtained and reviewed. Supplier history shall reflect recent capability. Previous favorable experience with suppliers may be an adequate basis for judgments attesting to suppliers' capability.

- An evaluation of the suppliers' current quality records supported by documented qualitative and quantitative information which can be objectively evaluated. This may include review and evaluation of the suppliers' QA Program Manual, procedures, and responses to questionnaires, as appropriate.

- A source evaluation of the suppliers' technical and quality capability as determined by a direct evaluation of facilities and personnel (audit, survey, or surveillance) and quality program implementation. Resolution or a commitment to resolve unacceptable technical or quality requirements identified by the bid evaluation or vendor evaluation shall be obtained prior to the award of a purchase order or contract.

5.4.1.3 Procurement source evaluations involve a review of technical and quality considerations to an extent considered appropriate by each participant. Technical

considerations include the design or manufacturing capability and technical ability of suppliers to produce or provide the design, service, item or component. Quality considerations include one of the previously stated methods of supplier evaluation and a consideration of a suppliers' current quality program or capabilities.

5.4.1.4 A documented quality assurance evaluation of a vendor's quality program shall be performed to assure it meets the appropriate requirements of 10CFR50 Appendix B, or where applicable, other nationally recognized codes and standards, or, for CGIs, to assure the program provides adequate control over established critical characteristics.

5.4.1.5 Vendors may be placed on the Approved Vendors List after passing this evaluation.

5.4.1.6 A vendor shall not be issued a purchase order or contract unless they have been accepted for placement on the Approved Vendors List or an exception has been approved by the Director, Quality.

5.4.1.7 Service organizations which will supply only manpower and no other service are not required to be on the Approved Vendors List or have an STP approved quality assurance program as long as the supplied personnel are trained and work under the auspices of the STP Operations Quality Assurance Plan.

5.4.2 Each vendor on t' Approved Vendors List shall be periodically evaluated by Quality as provided by Reference 4.3 (i.e., annually for "Full" program, biennially for "Basic" program).

5.4.2.1 A vendor may be removed from the Approved Vendors List if evaluation determines the vendor is unacceptable, the vendor requests removal or by direction of the Director, Quality.

5.4.3 Planning of verification activities to be employed for item or service acceptance shall begin during the purchase requisition or contract preparation and review stage. The extent of the verification activities will vary and be a function of the relative safety significance, complexity of the purchased item or service, and the supplier's past performance. The verification activities may include vendor surveillance, receipt inspection, or post-installation testing. Verification activities are planned to assure conformance to procurement document requirements. Procedures shall establish the organizational responsibilities for identifying required verifications and methods, performing and documenting the verification activities.

5.4.3.1 Verification activities shall be performed using plans developed in accordance with procedures with appropriate input from the cognizant technical organization. The plan shall specify the characteristics or processes to be witnessed, inspected or verified.

5.4.3.2 Specified source inspections may be waived by the Director, Quality.

5.4.3.3 Vendor related reports shall be evaluated to determine the effectiveness of the vendor's quality assurance program.

5.5 Receiving Inspection

5.5.1 Received purchased items shall be inspected for shipping damage and the requirements of ANSI N45.2.2 Section 5.2.1 and the applicable attributes of Section 5.2.2.

5.5.2 Receiving inspection shall be coordinated with verification activities. If source inspection is not performed or did not address all applicable attributes, receipt inspection shall be performed and shall include the applicable additional attributes listed in ANSI N45.2.2 Section 5.2.2, except for commercial grade items dedicated by survey which shall be receipt inspected as required by the procurement document.

5.5.3 Receiving inspection checklists shall be developed using the requirements specified in the procurement documents and applicable attributes of ANSI N45.2.2.

5.5.4 Statistical sampling methods may be used for groups of similar items. Sampling shall comply with nationally recognized methods or approved engineering alternates.

5.5.5 Receiving inspections shall be performed by personnel trained and qualified in accordance with Reference 4.5. Technical assistance shall be provided by Nuclear Generation or Nuclear Engineering & Technical Services as applicable.

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5.5.6 Receiving inspection activities shall include:

5.5.6.1 Identifying materials, parts, and components and their status upon receipt by tagging or other acceptable means of identification, or segregating and controlling items in receiving hold areas separate from the storage facilities for acceptable items.

Identification of items shall correspond to the identification required by procurement documents and be noted on receiving documentation.

5.5.6.2 Verification of items for this acceptance, including examination for shipping damage, correctness of identification, and specified quality documentation.

5.5.6.3 Inspecting or testing using approved procedures and calibrated tools, gauges, and measuring equipment for verification acceptance of items, including off-the-shelf items.

5.5.6.4 Items determined to be acceptable for use shall be identified with an "accept" tag or other acceptable means of identification prior to release for storage or use.

5.5.6.5 Received items which do not conform to procurement documents are controlled and segregated (if practical) and processed in accordance with Reference 4.6.

5.5.7 Acceptance by post-installation test may be utilized following one of the preceding verification methods. Post-installation testing may be used for acceptance verification when it is difficult to verify item quality characteristics, the item requires an integrated system checkout or test, or the item cannot demonstrate its ability to perform when not in use. Engineering specifications shall be used for developing post-installation test instruction requirements and acceptance documentation. Post-installation testing is the responsibility of the Plant Managers, STP, and is witnessed by Quality personnel at specified hold points.

5.5.8 Acceptance of Procured Items and Services

5.5.8.1 Acceptance of items and services shall be based on one or more of the following:

Written certifications
(Note: This shall not be the sole method of acceptance for items in the "Basic" program)

Surveillance/Audit of procured service

Source verification

Receiving inspection/testing

Commercial Grade Item dedication

Vendor surveillance

Post-installation test

5.5.9 Documented evidence from the supplier that procured items meet procurement quality requirements, when required, such as codes, standards, or specifications will be maintained at the plant site. Such evidence shall be provided by the supplier, at the time of source or receipt inspection, for review and verification before acceptance.The documented evidence will be retrievable and available at the plant site prior to installation or use of the procured item, unless otherwise controlled in accordance with Reference 4.6.

5.6 Vendor Surveys, Surveillance and Audit

5.6.1 Suppliers Certificates of Conformance, for items except those in the "Basic" category, shall be periodically evaluated by audits, independent inspections, surveys, or tests to assure that they are valid and results are documented. When acceptance is based upon source inspection, documented evidence shall be furnished to the plant receiving organization.

5.6.1.1 Acceptance by source inspection may be considered when the item or service is vital to plant safety; or the quality characteristics are difficult to verify after receipt; or the item or service is complex in design, manufacture, inspection, or test. Vendor surveillance/source inspection involves a physical presence to monitor, by observation, designated activities for the purpose of evaluating supplier performance and product acceptance (source inspection only).

5.6.2 The STP survey and audit program provide for periodic scheduled audits or surveys of suppliers, the site procurement program, contractors, subcontractors, and others performing work. The audit and survey schedule is prepared and updated by Quality. Frequency of these surveys and audits is based upon the safety, complexity, and quality requirements, and as a minimum shall be in compliance with Reference 4.3.

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 4.7.

7.0 ATTACHMENTS

7.1 None

1.0 PURPOSE

1.1 The purpose of this chapter is to prescribe the requirements and the responsibilities for inspection.

2.0 SCOPE

2.1 This chapter is applicable to inspection activities associated with systems, structures and components at the South Texas Project Electric Generating Station (STP).

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 OQAP Chapter 4.0, Qualification, Training and Certification of Personnel

4.2 OQAP Chapter 12.0, Instrument and Calibration Control

4.3 OQAP Chapter 14.0, Records Control

4.4 OQAP Chapter 2.0, Table I

5.0 REQUIREMENTS

5.1 Inspection

5.1.1 Inspections shall be performed in accordance with written and approved procedures. The inspection criteria established for performing inspections and the detail of the inspection process shall be determined based on the complexity of the activity and possible safety impact to the plant. Qualification of individuals performing inspections shall be in accordance with Reference 4.1 and 4.4. These individuals shall be other than those who performed or directly supervised the activity being inspected. Inspection requirements may be included as a part of the document controlling the activity, or a separate inspection procedure prepared to specify, as appropriate, the inspection performance requirements as noted below.

5.1.1.1 Identification of characteristics and activities to be inspected

5.1.1.2 Acceptance and rejection criteria

5.1.1.3 Inspection process utilized

5.1.1.4 Identification of procedures, drawings, specifications, and revisions utilized

5.1.1.5 Specification of the necessary measuring and test equipment including accuracy and calibration due dates as applicable

5.1.2 For "Full" program implementation, when inspections associated with normal operations of the plant are performed by individuals other than those who performed or directly supervised the work, but are within the same group, the following additional controls apply:

5.1.2.1 The quality of work can be demonstrated through a functional test when the activity involves breaching a pressure-retaining item; and

5.1.2.2 The qualification criteria for inspection personnel are reviewed and found acceptable by the Quality organization prior to initiating the inspection.

5.1.3 For "Basic" program implementation, with the exception of receipt inspection, personnel may perform inspections, examinations and tests provided:

5.1.3.1 They are experienced, task qualified journeymen, or supervisors, who did not perform or directly supervise the activity being inspected, examined or tested, and

5.1.3.2 These individuals shall also receive training to the Quality organizations's inspection procedure/process/methods in accordance with a Quality approved training program; and

5.1.3.3 Quality will provide periodic oversightof the inspection activities.

5.1.4 Examples of the activities subject to inspection include:

5.1.4.1 Special processes

5.1.4.2 Modifications

5.1.4.3 Receipt of materials, parts and components

5.1.4.4 Maintenance

5.1.4.5 Packaging, shipping and handling of radioactive waste material

5.1.5 Process Monitoring

5.1.5.1 Process monitoring of work activities, equipment, and personnel shall be utilized as a control method when direct inspection of processed items is impossible or impracticable. Monitoring shall be performed to verify that activities are performed in accordance with documented instructions, procedures, drawings, and specifications.

5.1.6 Supporting Inspections

5.1.6.1 Both inspections and process monitoring shall be used when control of the activity is inadequate without both. The need for such monitoring shall be determined prior to initiation of the activity, if possible, or may be stipulated later if circumstances warrant.

5.1.7 Mandatory Inspections

5.1.7.1 Mandatory inspection holdpoints are established by the organization performing the work or Engineering & Technical Services personnel. Witnessing or inspection of hold points by Quality shall be accomplished before work can proceed. Plant procedures and work instructions shall be reviewed by Quality personnel for concurrence with the established mandatory hold points.

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5.1.7.2 Quality also establishes notification points for the purpose of being informed of upcoming activities (e.g., prior to the start of a test) where a mandatory holdpoint may not be appropriate, but Quality involvement may be desired.

5.1.8 Inspection results shall be reviewed and approved by qualified personnel to verify that the inspection requirements were satisfied.

5.1.9 Inspection activities shall be documented and as a minimum, shall identify the following:

5.1.9.1 Item inspected

5.1.9.2 Date of inspection

5.1.9.3 Inspector

5.1.9.4 Type of observation/inspection

5.1.9.5 Results and acceptability

5.1.9.6 Reference to information on action taken in connection with nonconformances

5.1.9.7 Test equipment used

5.1.10 Inspection requirements for modifications, repairs, and replacements shall be equivalent to the inspection requirements of the original design or approved alternatives.

5.1.11 Procedures shall be reviewed by personnel sufficiently knowledgeable in the requirements of the activity to ensure that the necessary hold points are designated.

5.1.12 Measuring and test equipment utilized as part of the inspection process shall be controlled by the requirements of Reference 4.2.

5.1.13 Acceptance

5.1.13.1 Procedures shall be established for processing, evaluation, and final acceptance of inspection data. The qualified inspector performing the inspection is responsible for the immediate evaluation and acceptability of inspection results. Designated individuals or groups are responsible for reviewing and evaluating inspection results including recording of data, computations, drawings, or specification interpretations.

5.2 Nondestructive Examination (NDE)

5.2.1 NDE shall be performed in accordance with procedures which address the applicable requirements of ASME, ASTM, or other appropriate codes and standards.

5.2.2 The applicable requirements of Section 5.1 shall apply to the performance, evaluation, and documentation of NDE results.

5.3 Inspection Status

5.3.1 The status of individual item inspections shall be identifiable through the use of stamps, tags, labels, routing cards or documentation traceable to the item.

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 4.3.

7.0 ATTACHMENTS

7.1 None

1.0 PURPOSE

1.1 The purpose of this chapter is to establish requirements and responsibilities for the identification, documentation, evaluation, resolution, control and reporting of conditions adverse to quality.

2.0 SCOPE

2.1 This chapter applies to conditions adverse to quality discovered in items, services and activities under the scope of the Operations Quality Assurance Plan and the reporting of items to the Nuclear Regulatory Commission (NRC) in accordance with Title 10 Code of Federal Regulations.

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 10CFR50, Appendix B

4.2 10CFR21, Reporting of Defects and Noncompliance

4.3 10CFR50.72, Immediate Notification Requirements for Operating Nuclear Power Reactors

4.4 10CFR50.73, Licensee Event Report System

4.5 South Texas Project Electric Generating Station (STP) Technical Specifications

4.6 OQAP Chapter 14.0, Records Control

4.7 OQAP Chapter 2.0, Table I

5.0 REQUIREMENTS

5.1 All personnel working under the jurisdiction of the Operations Quality Assurance Plan are responsible for reporting conditions adverse to quality to appropriate management for resolution in accordance with approved procedures.

5.2 Procedures shall be developed for the control of items, services or activities which do not conform to established requirements. These procedures shall provide for the following:

5.2.1 Identification and documentation of conditions adverse to quality.

5.2.2 Identification of the requirements, source, or reference information being violated.

5.2.3 Notification of responsible management.

5.2.4 Control of conditions adverse to quality by tagging, segregation, administrative controls, or other appropriate means to prevent inadvertent installation, use, or continuation of the activity and removal of such controls when returned to service or availability.

5.2.5 Resolution and/or disposition approved by authorized personnel prior to closing out the documentation and restoring to normal service.

5.2.5.1 Material conditions adverse to quality disposition categories are:

- o "Use-as-is"
- o "Reject"
- o "Rework" in accordance with documented procedures
- o "Repair" in accordance with documented procedures

5.2.5.2 "Use-as-is" and "repair" dispositions shall be approved and justified in writing by Engineering & Technical Services.

5.2.5.3 Evaluations shall be performed to ascertain recurrence control measures.

5.2.6 Documentation of the corrective action taken.

5.2.7 Review and/or verification of the corrective action by the Quality organization, as appropriate.

5.2.8 Repaired and reworked items shall be reinspected in accordance with applicable procedures. Reinspection results are documented on inspection reports or other work process control documents.

5.2.9 Installation of nonconforming material, parts, and components may be performed after the effect of their installation has been evaluated and the installation approved by Plant Management and Engineering & Technical Services. Nonconforming items which may not be installed are those which, because of their makeup and intended use, cannot be repaired or reworked after being installed and those which, if installed and later removed, would degrade that system, structure, or component. Once installed, nonconforming items are not energized, used, or placed in service until the action required by the disposition, including reinspection, has been completed or an engineering evaluation has been prepared to justify the intended use of the nonconforming item. QA-037

5.2.10 Conditions adverse to quality identified on installed items will be evaluated for operability.

5.2.11 Disputes over corrective action are normally resolved by Plant Management. Should this resolution not be satisfactory, the parties may elevate the matter to higher management for resolution.

5.3 Procedures shall provide the following administrative controls:

5.3.1 Unique identification and numbering of conditions adverse to quality.

5.3.2 Preparing and maintaining status reporting of conditions adverse to quality.

5.3.3 Actions to be taken to assure timely corrective action on conditions adverse to quality.

5.4 Procedures which identify and track conditions adverse to quality shall require management review of each report to determine if the condition is significant. For significant conditions adverse to quality, the cause of the condition and the corrective action taken to preclude repetition shall be documented and reported to appropriate levels of management.

5.5 Measures shall be established for review and evaluation of conditions adverse to quality for reportability to the NRC as required by References 4.2, 4.3, and 4.4, as appropriate.

5.6 The authority to stop work has been assigned to the Director, Quality for any activity being performed by company personnel or contractors which do not conform to established requirements.

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5.7 Measures shall be established for the evaluation and trending of conditions adverse to quality. The results of these reviews and analyses are reported to the affected organization and executive management, and are audited by the Quality organization. Adverse trends shall be evaluated and processed in accordance with controlling procedures.

5.8 For medium and low safety significant SSCs treated by the Basic program controls, measures shall be established to identify causes and to trend failures to assist in evaluating the need for more detailed root cause analysis (if excessive failures occur) and proper corrective action. Further, particular consideration will be given to assessing the potential implications of such failures generically to similar SSCs treated by the Full program.

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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 4.6.

7.0 ATTACHMENTS

7.1 None

1.0 PURPOSE

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

2.0 SCOPE

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

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 OQAP Chapter 2.0, Table I

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, Control of Conditions Adverse to Quality

4.5 OQAP Chapter 14.0, Records Control

5.0 REQUIREMENTS

5.1 Independent Oversight Activities

5.1.1 Procedures shall be developed to control independent oversight 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.

5.2 Audits

5.2.1 A comprehensive audit program in compliance with Reference 4.1 shall be established and implemented by STP Nuclear Operating Company (STPNOC) to verify internal and external quality activity compliance with the Quality 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: QA-034

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.

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.

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. Audits are scheduled on a nominal biennial frequency, except those audits whose frequency is specifically governed by regulation.

If a decision is made to extend an audit beyond that nominal frequency, the basis for that decision shall be documented. Decisions shall be approved by the Director, Quality and notifications made to the Vice President, Nuclear Engineering & Technical Services and the Nuclear Safety Review Board.

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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 Quality Program.

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.

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 conditions adverse to quality.

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

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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 conditions adverse to quality 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 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 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 oversight activities.

5.3.4 Surveillance/quality performance monitoring results shall be documented and a summary shall be prepared and transmitted to responsible management.

5.4 Assessments/Evaluations

5.4.1 Assessments are conducted annually in accordance with written procedures to assess the Quality organization's implementation of the Operations Quality Assurance Plan.

5.4.1.1 These assessments will be conducted by organizations independent of the activities performed to assure the STPNOC OQAP is being properly implemented. QA-034

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 President and Chief Executive Officer. QA-034

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.

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

5.5.1 Activities/organizations to receive independent oversight.

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

5.6 Conditions adverse to quality identified during an independent oversight activity shall be documented in accordance with Reference 4.4.

5.7 Personnel performing independent oversight 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

1.0 PURPOSE

1.1 The purpose of this chapter is to prescribe requirements and responsibilities for repair and replacement activities governed by ASME Boiler and Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components.

2.0 SCOPE

2.1 This chapter is applicable to examination, repair and replacement activities performed on ASME Class 1, 2, 3, CC, and MC components. QA-036

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 OQAP Chapter 14.0, Records Control

4.3 Generic Letter 89-009, ASME Section III Component Replacements

5.0 RESPONSIBILITIES

5.1 The Vice President, Nuclear Generation is responsible for the planning, management, and control of the performance of repairs, replacements and tests.

5.2 The Vice President, Nuclear Engineering & Technical Services (NE&TS) is responsible for developing the repair and replacement program including specifications for design, fabrication, testing, and examination. The Vice President, NE&TS is responsible for providing qualified personnel to perform examinations of component repairs and replacements and verifying the requirements of this chapter are implemented. QA-037

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6.0 REQUIREMENTS

6.1 Repair and replacement activities required by Reference 4.1 shall be conducted in accordance with written and approved procedures or instructions.

Areas to be addressed include:

6.1.1 Accessibility for component examination, repair or replacement.

6.1.2 Identification of system boundaries and code class for each component.

6.1.3 The method for interfacing with the authorized nuclear inspection agency.

6.1.4 Qualification of nondestructive examination methods.

6.1.5 Qualification requirements for nondestructive examination personnel.

6.1.6 Qualification requirements for welders and welding operators.

6.1.7 Qualification of welding procedures.

6.1.8 Conduct of examinations and inspections.

6.1.9 A component repair or replacement package including installation and test procedures and quality assurance requirements.

6.1.10 Conduct of system pressure and functional tests.

6.1.11 A component replacement package including specifications for design, fabrication and examination as applicable for the replacements.

6.1.12 Preparation, submittal and retention of required records and reports.

6.1.13 Procurement, in accordance with Reference 4.3, of component replacements not available in full compliance with ASME code stamping and documentation requirements.

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 4.2.

8.0 ATTACHMENTS

8.1 None

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, 3, CC, and MC 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. 94-036

3.0 DEFINITIONS

3.1 None

4.0 REFERENCES

4.1 ASME Code Section XI, Rules for Inservice Inspection 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 & Technical Services (NE&TS) is responsible for developing and implementing the inservice examination and testing programs as required by ASME Code Section XI. The Vice President, NE&TS is responsible for verifying the implementation of the inservice examination and testing programs through appropriate quality oversight activities, interfacing with the Authorized Inspection Agency, and performance of nondestructive examinations as requested.

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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, 3, CC, and MC 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 & Technical Services shall develop plans for examination and testing of Class 1, 2, 3, CC, and MC components and their supports. These plans shall prescribe the requirements for nondestructive examinations and tests and the schedule for their performance. QA-037

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 & Technical Services 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. QA-037

6.1.3 Examination and test results shall be evaluated by specified personnel and verified by the Authorized Nuclear Inservice Inspector.

6.1.4 Coordination of involved STP Nuclear Operating Company (STPNOC) 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 STPNOC.

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.

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