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Docket Nos.: 50-348
50-364

10 CFR 50.54(a)(3)

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Joseph M. Farley Nuclear Plant
Final Safety Analysis Report
Quality Assurance Program Changes
Certification of Nondestructive Testing Personnel

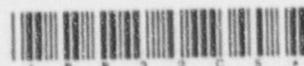
Ladies and Gentlemen.

Pursuant to 10CFR50.54(a)(3), attached is a change to the Farley Nuclear Plant (FNP) Final Safety Analysis Report (FSAR) Quality Assurance (QA) Program Description for your review and approval. The FNP FSAR QA Program description is located in Section 17.2 of the FNP FSAR.

The FSAR QA program description is being revised to remove the reference to American Society for Nondestructive Testing Recommended Practice No. SNT-TC-1A August 1980 Edition for qualification and certification of personnel performing nondestructive testing at FNP. Details of compliance with SNT-TC-1A are proposed to be relocated to another section of the FSAR (Section 3A) which describes specific compliance with NRC Regulatory Guides and is capable of being changed under the regulations in 10CFR50.59. Later editions of SNT-TC-1A are already approved by the NRC through updates to the regulations associated with new ASME Boiler and Pressure Vessel Codes in 10CFR50.55a. Therefore, removing the reference to SNT-TC-1A from the FNP FSAR QA program description will eliminate the need for redundant NRC approval due to potential "reductions in commitments" which may be entailed when incorporating a new edition of SNT-TC-1A.

SNC desires approval to use the 1984 Edition of SNT-TC-1A. However, since the 1984 version allows increased flexibility in recertification of personnel, this change is considered an extremely small reduction in the QA program commitments. SNC has evaluated the impact of this change and has concluded that the later version of the standard meets the requirements of 10CFR50 Appendix B and satisfies the intent of SNC's commitments to the NRC concerning qualification and certification of NDE personnel.

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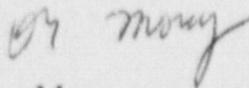


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If there are any questions, please advise.

Respectfully submitted,

SOUTHERN NUCLEAR OPERATING COMPANY



Dave Morey

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Attachments:

1. 10 CFR 50.54(a)(3) Evaluation
2. Section 17.2.2 Quality Assurance Program FNP FSAR

cc: Mr. L. A. Reyes, Region II Administrator
Mr. J. I. Zimmerman, NRR Project Manager
Mr. T. M. Ross, Plant Sr. Resident Inspector

ATTACHMENT 1

Final Safety Analysis Report
Quality Assurance Program Changes
10CFR50.54(a)(3) Evaluation

ATTACHMENT 1

Final Safety Analysis Report Quality Assurance Program Changes 10CFR50.54(a)(3) Evaluation

Affected Pages

See attached FSAR pages 17.2-11, 17.2-12 and 17.2-13.

Description of the Changes

The FSAR QA program description is being revised to remove the reference to American Society for Nondestructive Testing Recommended Practice No. SNT-TC-1A August 1980 Edition for qualification and certification of personnel performing nondestructive testing at FNP. Details of compliance with SNT-TC-1A are proposed to be relocated to another section of the FSAR (Section 3A) which describes specific compliance with NRC Regulatory Guides and is capable of being changed under the regulations in 10CFR50.59. SNC desires approval to use the 1984 Edition of SNT-TC-1A. Since the 1984 version allows increased flexibility in recertification of personnel, this change is considered an extremely small reduction in the QA program commitments.

Reason for the Changes

In the current FSAR QA program description, SNC is committed to the previous revision of SNT-TC-1A which was issued in June 1980. The 1984 version allows increased flexibility in the recertification of NDE personnel. This change will also facilitate the procurement of vendor NDE personnel who are certified to SNT-TC-1A 1984 under their own QA programs. Since the 1984 version allows increased flexibility in recertification of personnel, this change is considered an extremely small reduction in the QA program commitments. Later editions of SNT-TC-1A are already approved by the NRC through updates to the regulations associated with new ASME Boiler and Pressure Vessel Codes in 10CFR50.55a. Therefore, removing the reference to SNT-TC-1A from the FNP FSAR QA program description will eliminate the need for redundant NRC approval due to potential "reductions in commitments" which may be entailed when incorporating a new edition of SNT-TC-1A.

Basis for the Acceptability of the Changes

SNC has reviewed SNT-TC-1A 1984 and has concluded that it fully satisfies the intent of 10CFR50 Appendix B Criterion II, Quality Assurance Program, and Criterion IX, Control of Special Processes.

Attachment 1
10CFR50.54(a)(3) Evaluation

SNC has compared SNT-TC-1A 1984 with SNT-TC-1A 1980 and has concluded that the later version of the standard meets the requirements of 10CFR50 Appendix B and satisfies the intent of SNC's commitments to the NRC concerning qualification and certification of NDE personnel.

The NRC, via Regulatory Guide 1.147, has endorsed ASME Code Cases N-356 and N-445 which directly address the change from SNT-TC-1A 1980 to SNT-TC-1A 1984. The NRC has also endorsed the 1989 ASME Code in 10CFR50.55a which invokes SNT-TC-1A 1984 for qualification and certification of NDE personnel.

Moving the detail of compliance with SNT-TC-1A to section 3A of the FSAR is acceptable since changes to this section will still be controlled by 10CFR50.59.

ATTACHMENT 2

FSAR Mark-Up Pages

FNP-FSAR-17

FSAR section 17.2 are met and that adequate controls are included to ensure that the safety-related functions of existing plant structures, systems, or components will not be compromised or impaired by the construction of an MMA. After initial acceptance, the appropriate QA programs will be reviewed by the MSAER at least annually along as such work is being performed.

APC PGS Department will also provide technical support for SNC, as required on matters other than MMAs. Such services performed by APC PGS Department or SCS are under the cognizance of the OQAP.

17.2.3 QUALITY ASSURANCE PROGRAM

The OQAP became fully effective when components or systems were turned over from the APC Construction Department, at the completion of construction, to the APC startup staff for component/preoperational testing, and it is in effect throughout the operational life of the FNP.

The objective of the OQAP is to provide adequate assurance of quality during operation of the FNP by complying with the provisions described in the OQAPM and procedures listed in the OQAPIL which satisfy the criteria of 10 CFR 50, Appendix B. This program applies to operational activities affecting the functioning of those safety-related structures and systems listed in section 17.3.

Subsection 17.2.1 describes the functions and authorities of organizations that are responsible for performing activities which affect the quality of safety-related equipment. These SNC organizations, SCS, and APC's PGS Department ensure that the safety-related activities for which they are responsible will provide adequate quality by developing, approving, and ensuring adherence to written approved procedures as necessary.

Each organization is responsible for developing procedures that provide controlled conditions for activities within its scope. All prerequisites or environmental conditions necessary for performing an activity will be specified in these procedures. Within each procedure any special controls or conditions such as required equipment, skills, inspection points, etc., will be delineated. The plant staff will follow written approved procedures except as discussed in chapter 14 and section 13.5, which allow for procedure departure when the safety of the plant or personnel is endangered. These sections discuss the method of approving temporary and permanent changes to previously approved procedures.

The OQAPIL lists SAER procedures, FNP administrative procedures, and nuclear support administrative procedures which have been written to comply with the applicable criteria of 10 CFR 50, Appendix B.

The OQAP shall provide for indoctrination and training of personnel performing safety-related activities to ensure that the individual attains quality in job performance and complies with APC quality policies and procedures. Basically, this quality indoctrination and training is provided in two phases: OQA orientation training, and qualification and training for specific tasks.

The FNP OQA orientation training program was developed with assistance from SAER. Training in the OQAPM may be presented by videotaped lectures. This manual describes the safety-related and non-safety-related activities, duties, and authorities of each group assigned OQA responsibility in the OQAP. These presentations will encompass various types of safety-related operational activities, such as the QA filing system, receipt inspection, control of documents, inspection after maintenance, and approval of design changes. There will be a list of required attendees for each lecture as determined by the GMNS, GMNP, and MSAER. Records of the orientation will be developed and retained as quality records. This program will be repeated to serve as an annual refresher for those who previously passed the course and to provide indoctrination and training for new employees.

Each group involved in the OQAP is responsible for qualifying and requalifying its personnel, as required, to ensure that the required level of competency is maintained. This qualification includes proper selection of candidates for available positions and successful completion of training that will provide the required knowledge for performing assigned duties. This training may be provided by preplanned lectures and/or on-the-job training.

Subsection 13.1.3 and section 13.2 discuss the qualifications maintained by and the training program required for plant staff.

All plant staff who are assigned the responsibility and authority to approve inspection and test procedures, implement these procedures, and evaluate and report the results of the tests and inspections shall be certified as to their levels of capability in compliance with the requirements of Regulatory Guide 1.58, Revision 1, dated September 1980, which references ANSI N45.2.6-1978. ~~Persons performing nondestructive examinations~~

~~(NDE) shall meet the requirements in ENR TC 1A (1980) and applicable supplements.~~ The nuclear plant general manager shall determine the acceptance of experience qualifications, based on the guidelines presented in ANSI N45.2.6-1978, for capability levels in areas of testing and inspection other than NDE. Any test and inspection work performed by contractors for the plant staff shall also be performed by personnel who meet the qualifications required in Regulatory Guide 1.58, Revision 1, dated September 1980. The group responsible for performing the test or inspection, whether it is the plant staff or contractors, shall specify detailed methods or procedures for these activities unless stated in contract documents.

Appropriate training and certification records will be maintained by the nuclear plant general manager for each person designated to perform inspection and testing functions. Personnel performance evaluations will be maintained at the General Office and will not be a part of the certification records.

SAER is responsible for training its personnel to meet the requirements of the OQAP. An SAER administrative procedure, listed in the OQAPIL, details educational and training requirements for each SAER staff member. APC PGS Department, SCS, and SNC are responsible for the training of personnel within their organization that is required to assure that the individual attains quality in job performance and complies with the requirements of the OQAP and approved codes, specifications, and instructions for activities within the scope of the OQAP.

The vice president is responsible for approving the OQAPM and any changes thereto. The MSAER has the responsibility for making suggestions concerning the OQAP and the OQAPM to the vice president for his evaluation. The vice president is responsible for regularly reviewing the status and effectiveness of the FNP OQAP. He accomplishes this by reports from the MSAER, Corporate Headquarters Farley Project, the Plant Farley site organization, and the NORB.

17.2.3 DESIGN CONTROL

Measures are established to assure that for design changes and/or modifications for the operating nuclear plant, applicable regulatory requirements, quality standards, and design bases are properly translated into specifications, drawings, procedures, and instructions.

17.2.3.1 Quality Assurance (Other Than Nuclear Fuel Suppliers)

Design changes and/or modifications during plant operations will be handled in a manner which will comply with the requirements of ANSI N45.2.11-1974 and thereby maintain