

12/18/85

MEMORANDUM FOR: Vincent S. Noonan, Director, Comanche Peak Project
FROM: C. J. Hale, QA/QC Group Leader, Comanche Peak Project
SUBJECT: REVIEW OF TUGCO NOVEMBER 22, 1985 RESPONSES-QA/QC AREA

This review has included the QA/QC ISAPs, the quality aspects of those items in section VII of the CPRT Program Plan, and the CPRT umbrella QA program plan as described in Appendix G of the subject document. During this review I have interfaced and exchanged comments with John Gilray (Appendix G) and Jim Malonson (ISAPs).

I have reviewed the responses to each of the section VII concerns beginning on page 73 of 180 of the subject document. It appears that TUGCO has been responsive to each of these concerns. I have obtained copies of the matrices referred to on these pages and provided copies to Jim Malonson for use in his review. Further, I have reviewed the draft of Jim Malonson's Section 4.6 of the next SSER and do not disagree with the conclusions he makes.

Appendix G describes accurately the QA program in place for control of CPRT activities. The manuals implementing this program are the CPRT Program Plan (as amended), CPRT Policies and Guidelines (six at present), TERA's DAP manual, and three ERC manuals (Comanche Peak Procedures, Quality Instructions, and the ERC corporate manual-site related). This program is consistent with 10CFR Part 50, Appendix B, relative to the activities being performed by the CPRT. Based on my review, I believe the following items remain yet to be resolved:

1. The CPRT Policies and Guidelines manual is the first level implementing document below the CPRT Program Plan, but is presently a draft document.
2. While the CPRT program is consistent with 10CFR Part 50, Appendix B, the NRC has not required such a commitment, and thus must be prepared to defend the position of not making this a requirement.
3. Apart from the CPRT Program Plan there are no documented procedures or instructions related to SRT responsibilities and activities. One activity that the SRT is apparently not planning is audits by themselves or by others of the CPRT activity for which they are responsible.

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Discussion with John Gilray indicates his preliminary review of Appendix G is yielding results similar to those above. I will continue to interface with both John and Jim as their reviews progress.

C. J. Dale

cc

T. Westerman

J. Malonson