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October 1, 1987

Mr. Richard E. Cunningham, Director Division of Fuel Cycle and Material Safety, NMSS Washington, D.C. 20555

Dear Mr. Cunningham:

Attached for your review is Module 1 of the Allied Signal, Metropolis Works, Quality Assurance Manual. This is the first of eighteen modules that will parallel ANSI/ASME NQA-1-1986. The remaining 17 modules have been written and are currently in the process of review and approval. Our current time table would indicate completion of all modules by year end with issue of the manual scheduled for the first quarter 1988. At that time, we plar to prepare a license amendment to include the Quality Assurance Program in our operating license.

Feel free to contact me if you have any questions concerning this matter.

Sincerely,

shepherd

Manager Process Technology Quality Assurance

bsc

Attachment

| cc: | Mr. | J. | с. | Bishop    |
|-----|-----|----|----|-----------|
|     | Mr. | J. | Ε. | Honey     |
|     | Mr. | R. | W. | Yates     |
|     | Mr. | R. | с. | Allshouse |

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### 1.0 ORGANIZATION

## 1.1 GENERAL

- 1.1.1 Metropolis Works (MTW) is an organization within Allied/Signal (Allied). The parent company is headquartered in Morristown, NJ. Metropolis Works is situated north of Metropolis, IL. The Metropolis facility is licensed by the Nuclear Regulatory Commission and operated for the conversion of Uranium Ore Concentrates (UOC) to Uranium Hexafluoride (UF<sub>6</sub>).
- 1.1.2 MTW also contains the facilities to produce gaseous fluorine, liquid fluorine, sulfur hexafluoride, iodine pentafluoride, antimony pentafluoride, carbon monofluoride and calcium fluoride.

### 1.2 AUTHOPITY AND RESPONSIBILITY

- 1.2.1 The Plant Manager is ultimately responsible for the design, procurement, modification, training, testing and operation of the facility and personnel.
- 1.2.2 In general, the Quality Assurance program provides that an activity is verified as being correctly performed, that Quality Assurance activities are performed independent of the individual or group directly responsible for performing a specific activity, and that the Quality Assurance organization has sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions.

- 1.2.3 The responsibility for the development, modification and implementation of the Quality Assurance program has been assigned to the Manager of Process Technology and Quality Assurance and to the Technical Supervisor-Quality Assurance. The Technical Supervisor-Quality Assurance shall have minimal direct process responsibility. The Quality Assurance Department shall be organized so as to minimize the possibility of conflict of interest and maximize objectivity. The organization shall not be directly involved in the operation or maintenance of the facility.
- 1.2.4. All QA personnel or delegates shall have the responsibility to recommend cessation of any operation, as necessary, when a deviation from the applicable QA program, procedure, specification, etc. warrants such action. Following such a cessation due to QA considerations, work will not be permitted to proceed until such corrective action has been taken to bring the deviation into conformance. This must be verified by the Quality Assurance organization.
- 1.2.5 The Quality Assurance department may delegate or assign specific tasks to other MTW, Allied, or commercial organizations. Said delegation or assignment will be made by the Manager of Process Technology and Quality Assurance in concurrence with the manager of the affected department. Delegation or assignment shall be performed to provide required manpower, expertise or other resource

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necessary to adequately complete the Quality Assurance task. In such cases, the Quality Assurance department maintains responsibility and final authority for the delegated task.

# 1.3 FUNCTIONAL ORGANIZATION

- 1.3.1 The functional organization within MTW is depicted in Figure 1-1.
- 1.3.2 The operation of the facility is the responsibility of the Plant Manager. The Plant Manager shall be responsible for all phases of the design, procurement, modification, maintenance and operation of the facility.
- 1.3.3 MTW has been organized into six broad areas of responsibility to provide the requirements needed to operate the facility. Each area is controlled by a Department Manager that reports directly to the Plant Manager.

The six areas of responsibility are:

- a. Production
- b. Maintenance
- c. Process Technology/Quality Assurance
- d. Health, Safety, Environmental and Regulatory Affairs
- e. Accounting, Accountability and Procurement

f. Employee Relations

- 1.3.4 The Quality Assurance organization shall verify that there are requirements and procedures in effect which assure:
  - a. that the operation of the facility complies with applicable corporate policies.

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- b. that regulatory requirements such as licensing requirements, document preparation and submission and environmental reporting are met.
- c. that the design of new construction and equipment or design or modifications to existing facilities and equipment receives sufficient review to assure that:
  - design is performed in accordance with good engineering practice.
  - ii. design complies with appropriate standards.
  - iii. that design calculations and drawings are reviewed by appropriate personnel.
  - iv. that specifications for materials of construction are reviewed to assure the use of appropriate material. Review shall be via Appropriation Request review for new installations or PT-101 for modifications to existing installations. Review shall not be required for replacement in kind.
- d. that appropriate documentation is retained to provide evidence of the design reviews.
- e. that the operation of the facility complies with corporate, regulatory, industry and/or MTW requirements as applicable to each phase of operation.

1.3.5 Quality assurance personnel are responsible for:

a. Developing and maintaining the MTW Quality Assurance program.

b. Establishing requirements and standards for

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verification of quality. For the purposes of this QA program, quality shall be defined as "conformance to measurable criteria and requirements."

- c. Verifying or having verified by appropriate means that quality requirements are met or exceeded for specified materials, components, equipment, processes or modifications. The extent of verification shall be commensurate with the criticality of the item or process.
- d. Auditing for compliance to operating procedures or other plant procedures and policies established for the operation of Metropolis Works.
- e. Documenting and reporting to the Plant Manager and Manager-QA, non-conformances detected in the course of any inspection, audit or surveillance.
- f. Recommendation of the prevention of any continued work in the event of a non-conformance of a level that may create a hazardous, serious, or non-correctable condition.
- g. Ensure that corrective actions are effective and timely.

## 1.4 MTW ORGANIZATIONAL INTERFACES

- 1.4.1 Interfaces within MTW are established by the Plant Manager, in broad terms, through organizational position descriptions that delegate authority and responsibility.
- 1.4.2 Specific interfaces are established by Department Managers and Area Supervisors. Implementation of specific

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interfaces may be delegated to responsible supervisors, engineers, or other employees.

- 1.4.3 Both the Manager-Process Technology/QA and Technical Supervisor-QA shall have direct access to the Plant Manager. This will provide the organizational freedom required to perform QA functions effectively.
- 1.4.4 During accomplishment of assigned work activity, interface questions may be directed as follows:
  - Basic technical, business and plant operations planning requirements are directed to the Plant Manager.
  - Individual unit operations, plant maintenance, design, procurement, accountability, construction, etc., are directed to the appropriate Department Manager.
  - c. Licensing, environmental, safety, regulatory (including NRC) are directed to the Manager -Regulatory Affairs.
  - d. Transportation of  $\text{UF}_6$  cylinders shall be directed to the Technical Supervisor- $\text{UF}_6$  Cylinder Quality Assurance.
  - e. Quality Assurance related questions shall be directed to the Manager-Process Technology/Quality Assurance or Technical Supervisor-Quality Assurance.
  - f. Authority and responsibility for fulfilling the requirements of the interface may be delegated by the appropriate manager as necessary.

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# Metropolis Works Organizational Chart

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Figure 1-1. Metropolis Works Organization

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