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Attachment 5

Nuclear Oversight Program

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QUALITY RELATED

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1. PROGRAM OVERVIEW

1.1 The company goal for the plant is to run at the "highest level of safety, performance and reliability." In order to meet this goal, nuclear generation has established a comprehensive multi-level oversight, audit, assessment, and verification program.

1.2 The purpose of this Program Directive (PD) is to define the different types of oversight, audit, assessment, and verification that nuclear generation will perform; assign specific responsibilities; and, where appropriate, reference other PDs and Inter-departmental Administrative Procedures that provide further policy and direction. A chart, "Purview of Oversight," that depicts the relationship between the different oversight activities described in this PD is attached.

2. APPLICABILITY

2.1 This PD is applicable to all organizations and persons involved in the performance of activities in support of meeting the company goal for safe operation of the plant. This includes all nuclear generation personnel, personnel matrixed to nuclear generation from other business units, personnel in other business units that are engaged in plant activities in support of nuclear generation, and contractor personnel who augment the nuclear generation staff.

3. DEFINITIONS

- 3.1 Assessment: The act of reviewing, checking, conducting surveillances, auditing, or otherwise determining and documenting that items or activities meet specified requirements or standards. Assessments may also be used to investigate improvements. Assessments are performed typically by the quality organization.
- 3.2 Audit: A documented activity performed in accordance with written procedures, often with a checklist, to verify, by examination and evaluation of objective evidence, that applicable elements of the quality assurance program, have been developed, documented, and effectively implemented, in accordance with specified requirements.
- 3.3 Oversight: Monitoring or reviewing, on a continuing or ad hoc basis, of selected items or activities to ensure that the items or activities are performed as expected.
- 3.4 Self-Assessment: An assessment performed for the management of an organizational unit to determine if that unit is meeting its goals and to eliminate procedural and organizational barriers to improving that unit's performance.
- 3.5 Verification: The act of inspecting, testing, or otherwise determining and documenting that items meet specified requirements. Verifications are typically performed by quality organization independent inspection personnel or by personnel independent from the person who performed the activity being verified.

4. PROGRAM OBJECTIVES AND REQUIREMENTS**4.1 Management Oversight Functions****4.1.1 Direct Observation**

- a. OBJECTIVE: Management at all levels should have adequate first-hand knowledge of how plant activities are controlled, how daily operations are conducted, and how well the plant's material condition is being maintained.
- b. REQUIREMENT: A key oversight function is direct observation of activities in progress by directors and supervisors. This shall be accomplished through an observation program, frequent informal tours of the plant, and through an appropriate level of supervisory involvement in plant activities.

4.1.2 Issues Needing Additional Management Attention

- a. **OBJECTIVE:** Problems and issues that need additional management attention should be elevated to an appropriate level in the organization and addressed by responsible management in a timely manner. This includes problems reported through the formal problem reporting processes that are not making adequate progress toward resolution.
- b. **REQUIREMENTS:** Problems concerning the plant or activities performed to support the plant shall be reported and resolved in accordance with OM7, "Corrective Action Program." In addition, the following management oversight actions shall be taken when necessary.
 - 1. Problems or issues that need additional attention or direction from the site vice president or station director (as applicable) shall be brought to his/her attention. Action items should be assigned by the site vice president or Station Director when additional follow-up action is needed.
 - 2. Problems or issues that need additional attention or direction from the nuclear services vice president shall be brought to his/her attention. Action items should be assigned by the nuclear services vice president when additional follow-up action is needed.
 - 3. Problems or issues that need additional attention or direction from the chief nuclear officer shall be brought to his attention. A convenient forum for these issues is the Senior Leadership Team meeting. Action items should be assigned by chief nuclear officer when additional follow-up action is needed. Decisions made at the meeting to resolve issues should be documented.

4.1.3 Results of Audits and Assessments

- a. **OBJECTIVE:** Management should use audits and assessments as tools for evaluating performance and initiating improvements where necessary. This includes internal assessments, and external assessments, such as those performed by regulatory agencies and the Institute of Nuclear Power Operations.
- b. **REQUIREMENT:** Management personnel shall review the results of audits and assessments performed in areas of their responsibility and take appropriate corrective actions to make needed improvements. They should also request additional audits or assessments in areas where they feel performance may not meet requirements or where improvements may be needed.

4.1.4 Measuring Performance and Trends

- a. **OBJECTIVE:** Directors should routinely measure how effectively and efficiently processes or activities, for which they have responsibility, are being performed, and take appropriate actions when improvement is needed.
- b. **REQUIREMENT:** Responsible directors shall develop performance indicators for determining the effectiveness and efficiency of key processes and activities. They shall periodically measure performance using these indicators and make improvements when needed.

4.2 Standing Committees and Special Review Functions

4.2.1 **OBJECTIVE:** Standing committees are intended to provide a high-level, multi-disciplined review of nuclear safety, environmental, and technical issues and advise responsible directors and officers. They are advisory in nature and have no direct management authority or responsibility.

4.2.2 **REQUIREMENTS:** Standing committees and special review functions shall be established and shall perform functions as required by the plant final safety analysis report update, applicable regulatory guides, and commitments made to regulatory agencies.

- a. The following standing committees and special review functions have been established and assigned oversight responsibilities:
 - Plant Staff Review Committee (PSRC)
 - Nuclear Safety Oversight Committee (NSOC)
- b. A procedure has been developed that describes the interface between Diablo Canyon and the DCISC.
- c. Diablo Canyon Independent Safety Committee (DCISC) also performs an oversight function for the state of California.
- d. A procedure has been developed for each of these functions, except the DCISC, that details membership, scope of activities, and reporting requirements.
- e. Other committees may be formed as required to meet specific, usually short-term needs, as deemed necessary by officers or directors.
 1. The NSOC Chair reports to and advises the chief nuclear officer on the adequacy and effectiveness of the independent review program. The independent review program, performed by NSOC, conducts independent reviews of the actions and practices relating to nuclear power plants which may have a bearing on nuclear safety and environmental matters. This includes review of the activities of the PSRC, and other activities in accordance with Section 5 of the plant Technical Specifications and Section 17.2 of the FSAR.

2. Audits are performed by quality under the cognizance of the independent review and audit program. The status and adequacy of the audit program as well as the effectiveness of the Quality Assurance (QA) Program are periodically reviewed. The quality director reports to and advises the chief nuclear officer on the adequacy and effectiveness of the audit program.
3. The plant PSRC is a technical committee that reviews specific activities, procedures, tests, and experiments. Their recommendations provide the station director with additional confidence that a particular item is technically correct. The PSRC also conducts periodic reviews of plant operating activities to evaluate that operating activities are conducted safely and in accordance with applicable administrative controls. The PSRC performs special reviews as requested by the NSOC and the station director.
4. DCISC is an organization external to the company that was established as part of the plant rate case settlement agreement. The DCISC provides oversight of the plant's operations and reports findings and conclusions to the state of California. Nuclear generation provides information and presentations in response to DCISC requests.

4.3 Audits

4.3.1 Consist of regulatory-required and requested audits.

4.3.2 Regulatory-Required audits are performed by quality. Audits are performed following the planning, reporting, and qualification guidelines established in ANSI N45.2.12. The different types of these assessments performed include:

- a. Audits of company activities are performed to meet the schedule developed within the independent review and audit program to verify that the company meets those commitments specified in FSAR Update, Chapter 17, and those commitments specified to the NRC, or other regulatory agencies.
- b. Audits and commercial-grade surveys of suppliers are performed to evaluate their capability to provide items and services meeting the company quality requirements.
- c. Additional audits, outside the scope of the FSAR Update may be performed as directed by the quality director; and other responsible company management. These additional audits may not be regulatory-required, but will be performed to the same requirements.

4.4 Assessments

4.4.1 Consist of performance assessments and self-assessments.

4.4.2 Performance Assessments are activities performed to assure that the plant safety and reliability requirements are being met in an efficient and productive manner. These assessments are driven by management's desire to manage the plant in a manner consistent with our responsibilities to our community and shareholders. Special assessments may include the following activities:

- a. Quality conducts in-depth performance-based assessments of selected plant programs or activities. Typical assessment areas are those that are significant emerging regulatory or industry issues and INPO evaluation areas where bench marking against best industry practices is desired.
- b. Quality performs an overall quality performance effectiveness assessment and evaluation of nuclear generation quality-related departmental activities on a periodic basis. These results are reported in the quality performance assessment report (QPAR).

4.4.3 Self Assessments are performed for the management of an organizational unit to inform management that the organizational unit is first, meeting its expectations, and secondly, eliminating management barriers to improving that organizational unit's performance. Self assessment is part of nuclear generation's ongoing continuous improvement as well as monitoring processes.

- a. Self assessments are one process used by organizations to demonstrate the status and adequacy of that part of the QA program which they are executing. Refer to 10 CFR 50, Appendix B, Criterion II.
- b. Self-assessment focuses on the process being reviewed and its relationships and interfaces with all parts of the company. Directors select processes to be reviewed, determine where their organization is in meeting requirements, determine where they want to be, how to get there, and a schedule. Management barriers to reaching the desired goal are determined as well as steps to eliminating these barriers.

4.5 Verification

Quality is responsible to perform quality control verifications and surveillances to provide assurance that work is being performed as specified in approved procedures, and that completed work meets applicable specification and drawing requirements.

4.5.1 Independent Inspection Functions

The quality director has established an independent inspection organization that is responsible for performing verification functions for nuclear generation. This organization is responsible for performing independent inspections of activities to verify that the activities are performed in accordance with applicable documents.

4.5.2 Typical verification activities performed include:

- Maintenance and modification hold-point inspections
- Receipt inspection
- Post-installation inspections
- Source surveillances and inspections.
- Inservice inspection

(For a description of quality assurance and inspection responsibilities, see OM5, "Quality Assurance Program." For a description of Inspection Policy, see AD5, "Inspections.")

5. **RESPONSIBILITIES**

- 5.1 The Chief Nuclear Officer is responsible for the overall implementation of the requirements of this PD and for providing management support, guidance, and assistance for the program.
- 5.2 The site vice president is responsible for ensuring that the requirements of this PD are implemented by nuclear generation personnel at the plant.
- 5.3 The nuclear services vice president is responsible for ensuring that the requirements of this PD are implemented by nuclear services personnel supporting nuclear generation activities.
- 5.4 The Quality director is responsible for implementing an audit, assessment and quality control program in conformance with this PD.
- 5.5 Directors of organizational units within nuclear generation are responsible for determining which processes would benefit by a self-assessment program and implementing such a program.

6. KEY IMPLEMENTING DOCUMENTS

6.1 Inter-Departmental Administrative Procedures (IDAPs)

6.1.1 Plant PSRC Operation and Organization

- a. An IDAP shall be developed to describe the operation and organization of the plant PSRC.

6.1.2 NSOC Operation and Organization

- a. An IDAP shall be developed to describe the operation and organization of the NSOC.

6.1.3 Internal Audit Program

- a. An IDAP shall be developed to describe the quality internal audit program.

6.1.4 Supplier Audit Program

- a. An IDAP shall be developed to describe the quality supplier audit program.

6.2 Department-Level Administrative Procedures (DLAPs)

- 6.2.1 Departments responsible for performing activities related to the performance of oversight, assessment or verification that require more specific direction than provided in this PD and related IDAPs shall develop DLAPs to assign responsibilities and implement the program requirements specified in this PD and associated IDAPs.

7. **CLOSELY RELATED PROGRAMS**

The policies described in this PD interface with many other nuclear generation processes and activities. Interfaces of particular significance include the following PDs and IDAPs:

7.1 AD5, "Inspections"

7.1.1 Describes the system for implementing Independent Inspections.

7.2 AD9, "Procurement Control"

7.2.1 Describes the system for evaluating suppliers.

7.3 OM5, "Quality Assurance Program"

7.3.1 Describes the responsibilities for implementing the Quality Assurance Program.

7.4 OM7, "Corrective Action Program"

7.4.1 Describes the system for reporting and correcting quality problems.

8. **RECORDS**

None

9. **REFERENCES**

9.1 QA Commitment: FSAR Chapters 17.1, 17.2, 17.2.4, 17.18

9.2 QA Commitment: Reg Guide 1.33

9.3 10 CFR 50, Appendix B, Criterion II

