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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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P.O. Box 968 • Richland, Washington 99352-0968

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April 6, 2000  
GO2-00-064

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21  
ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL  
QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/EN-  
QA-004) REVISIONS 30, 31, 32, AND 33**

As required by 10 CFR 50.54(a)(3), Energy Northwest is providing the annual submittal of changes made to the Operational Quality Assurance Program Description (WPPSS-QA-004/EN-QA-004), Revisions 30, 31, 32, and 33. The changes were made in accordance with the requirements of 10 CFR 50.54(a)(3) and the guidelines provided in the Direct Final Rule of April 26, 1999.

Energy Northwest has evaluated these changes and has determined that several of the changes in Revisions 32 and 33 constitute a reduction of commitments. However, the changes were allowed to be implemented prior to NRC approval as defined under the revised provisions of 10 CFR 50.54(a) and the guidelines of the Direct Final Rule of April 26, 1999.

A description and justification for the revisions to the Operational Quality Assurance Program Description are provided under Attachment I of this submittal. Attachment II includes Revisions 30, 31, 32, and 33. Vertical lines have been placed next to the revised text.

Should you have any questions or desire additional information regarding this submittal, please contact Mr. S. A. Boynton, Quality Manager, at (509) 377-4627.

Respectfully,

RL Webring (Mail Drop PE08)  
Vice President, Operations Support/PIO

Attachments: As stated above

cc: EW Merschoff - NRC-RIV  
JS Cushing - NRC-NRR  
TC Poindexter - Winston & Strawn

NRC Sr. Resident Inspector - 927N  
DL Williams - BPA/1399

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**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004) REVISIONS 30, 31, 32, AND 33**

Attachment I  
Page 1 of 10

**OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (OQAPD), Revision 30**

Revision 30 to the OQAPD changed Section 1, Organization. The changes consisted of combining the position Vice President, Generation and Plant General Manager and transferring responsibilities for the Procurement Department from Vice President, Administration/Chief Financial Officer to the General Counsel.

The changes implemented in Revision 30 of the OQAPD are administrative and do not reduce a commitment, reduce QA/QC independence, or affect the Technical Specifications.

**OQAPD, Revision 31**

Section 1.3.2, Organization, was changed to transfer the responsibility for administering the nonconforming condition and corrective action process program and in-plant operating experience from the Quality Department to the Vice President, Generation/Plant General Manager.

Section 1.3.2.1 and Figure 1-2 were changed to implement a new position of Radiological Services Manager, reporting to the Plant Production Manager. This new position serves as the manager of the Radiological Protection Department. The new position of Assistant Radiological Services Manager/Radiation Protection Manager, reporting to the Radiological Services Manager, meets and fulfills all the requirements and responsibilities of the Radiation Protection Manager as described in the Licensing Basis Documents.

Sections 1.3.3.1, 1.3.3.1.2, and 1.3.3.3 were changed to transfer the responsibility for Nondestructive Evaluations from the Quality Department to the Engineering Department.

Section 2, Quality Assurance (QA) Program, was changed to correct a position title noted in Section 2.2.6 and added several new Site Wide Procedures to Table 2-2.

An editorial change was made to Section 4, Procurement Document Control, to correct punctuation in Section 4.2.6.

Section 12.4, Control of Measuring and Test Equipment was clarified to align the wording on standards adequacy to agree with ANSI/NCSL Z540-1-1994, Calibration Laboratories and Measuring and Test Equipment-General Requirements.

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY  
ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004)  
REVISIONS 30, 31, 32, AND 33**

Attachment I

Page 2 of 10

Section 17.2.1.g, QA Records, was changed to correct an editorial error.

Appendix I-I.2, Qualification Requirements, was changed to indicate there is only one Quality Programs Supervisor.

Appendix III, Additional Quality Program Requirements, paragraph 6.0, Operating Experience was added. This paragraph, TMI ITEM I.C.5, was moved from the FSAR to the OQAPD as part of the FSAR upgrade process. The wording included in paragraph 6.0 is not verbatim to letter GO2-83-345, which provided Energy Northwest's response to TMI ITEM I.C.5, but the wording does meet the intent of the letter.

Appendix III, Sections 2.1.6.f and 2.2.g were clarified by adding the definition of the words, "All REPORTABLE EVENTS." Adding the definition to the end of these sections, "... as specified in 10 CFR 50.73," clarifies what REPORTABLE EVENTS must be reviewed.

The changes implemented in Revision 31 of the OQAPD are administrative and do not reduce a commitment, reduce QA/QC independence, or affect the Technical Specifications.

**OQAPD, Revision 32**

Revision 32 revised all OQAPD Sections and Appendices to change the company name and logo from Washington Public Power Supply System to Energy Northwest. This change is administrative and does not constitute a reduction in commitment. In addition, the following Sections were changed.

Section 1, Organization, was changed from specific positions and titles to generic positions and titles. This type of change is allowed by Direct Final Rule paragraph (a)(3)(iii) of 10 CFR 50.54 which specifies that licensees may replace specific organizational and position titles with generic titles that clearly denote the position function, supplemented as necessary by descriptive text. The specific organizations and positions discussed are those that directly implement the QA Program. Other important WNP-2 organizational personnel, reporting relationships, and responsibilities are described in Chapter 13 of the Final Safety Analysis Report for WNP-2. This change is consistent with previous NRC positions on generic organizational positions and titles approved by NRC SER for the revised Entergy QA Program applicable to License Docket Nos. 50-313, 50-368, 50-416, 50-458, and 50-382 (SER dated November 6, 1998)(TAC NO. M97893).

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004) REVISIONS 30, 31, 32, AND 33**

Attachment I

Page 3 of 10

Section 2.2.7, Regulatory Commitments, was added. This addition clarified Energy Northwest's position on Regulatory Commitments. Section 2.2.7.f implemented scheduling latitude of 25 percent or 90 days, whichever is shorter, that may be applied to performance of periodic activities (annual supplier evaluations, triennial vendor audits, re-certification in accordance with ANSI N45.2.23-1978, annual evaluation in accordance with ANSI N45.2.6-1978, and internal audits in accordance with ANSI N18.7-1976). A similar provision for scheduling latitude was included in a recent submittal and approved in a NRC SER for the Rochester Gas and Electric Company, R.E. Ginna Nuclear Power Plant, Docket No. 50-244 (SER dated July 22, 1998)(TAC NO. MA0391).

The scheduling latitude of 25 percent or 90 days, whichever is shorter, for performance of periodic activities is not specifically addressed by Regulatory Guide 1.33, Revision 2, ANSI N18.7-1976/ANS-3.2, ANSI N45.2.6-1978, or ANSI N45.2.23-1978, and it deviates from previous Energy Northwest commitments. However, the intent of the Regulatory Guide and standard regarding audits of safety-related functions within a 2-year period continues to be satisfied by maintaining the base audit frequency at 24 months. For internal audits, the requirement of 10 CFR 50, Appendix B, Criterion XVIII to implement a comprehensive system of planned and periodic audits continues to be satisfied as well as the audit frequencies specified by regulation. For supplier evaluations and audits, the requirements of Criterion VII for supplier source evaluation and selection and for assessment of suppliers at intervals consistent with the importance, complexity, and quantity of the product or services provided continues to be satisfied. The scheduling latitude for annual re-certification of audit personnel in accordance with Regulatory Guide 1.144, Rev. 1/ANSI N45.2.12-1977 and Inspection, Examination, and Testing personnel as specified in Regulatory Guide 1.58, Rev. 1/ANSI/ASME N45.2.6-1978 will still be accomplished. Audit personnel and Inspection, Examination, and Testing personnel will continue to be evaluated with the annual re-certification date allowed to have some scheduling latitude.

Section 12.1, Control of Measuring and Test Equipment, was modified to clarify the types of equipment that do not require calibration and control measures. This is an administrative clarification.

Section 18.2.1, Audits, was modified to clarify how external audits are scheduled. Section 18.2.7 was modified to clarify that follow-up action shall be accomplished on adverse audit findings. This is an administrative clarification.

Appendix I, Qualification Requirement, was modified to specify how key Quality Assurance personnel can meet the requirements of ANSI/ANS-3.1-1978. The

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004) REVISIONS 30, 31, 32, AND 33**

Attachment I

Page 4 of 10

modification is consistent with ANSI/ANS-3.1-1987, paragraph 4.3.7, Quality Assurance. This is an administrative clarification and is not a change to a commitment.

Appendix II.5.2, Position Statement for Regulatory Guide 1.33, Revision 2, and Appendix III.2.2.8, Additional Quality Program Requirements for Corporate Nuclear Safety Review Board, have been changed to modify the Audit Program description for audit frequency. The proposed changes in the Audit Program and frequencies are a reduction in QA Program commitments. However, the changes may be implemented prior to NRC approval as defined under the revised provisions of 10 CFR 50.54(a) and the guidelines of the Direct Final Rule of April 26, 1999, Section (ii). The guidance states that a change is not considered a reduction in commitment with the use of a QA alternative or exception approved by a NRC safety evaluation, provided that the bases of the NRC approval are applicable to the licensee's facility.

The changes in audit frequencies, listed below, are consistent with the frequencies included in a recent submittal and approved by NRC SER for the revised Entergy QA Program applicable to License Docket Nos. 50-313, 50-366, 50-416, 50-458, and 50-382 (SER dated November 6, 1998) (TAC NO. M97893). The changes to audit frequencies are as follows:

- Appendix II.5.2 was changed to establish a minimum two-year audit frequency for all safety related functions and recommends audit frequencies specific to corrective action, facility operation, and staff performance, training, and qualifications. The 2-year minimum audit frequency is an alternative to the current WNP-2 position related to Regulatory Guide 1.33, Revision 2, February 1978 and ANSI N18.7-1976. The alternative will allow the audit frequencies specified in Appendix III.2.2.8 instead of audit frequencies contained in Regulatory Guide 1.33, Regulatory Position C.4.
- The results of actions taken to correct deficiencies that affect nuclear safety and occur in facility equipment, structures, systems, or method of operation, "at least once per 6 months," is changed to "at least once per 24 months." Corrective actions that are taken related to specific program areas are routinely monitored in conjunction with ongoing audits and evaluation of specific program areas. Corrective actions taken for significant deficiencies related to the program areas are evaluated during the course of each program area audit. An additional audit of the overall implementation of the corrective action process is performed at a frequency of at least once per 24 months. Additional audits or assessment activities may be specified based upon corrective action program performance, specific program performance, or other factors that indicate the need for increased assessment of corrective actions.

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY  
ASURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004)  
REVISIONS 30, 31, 32, AND 33**

Attachment I

Page 5 of 10

- The conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions, “at least once per 12 months,” is changed to “at least once per 24 months.” Technical Specifications and license condition compliance is routinely monitored in conjunction with ongoing audits and evaluations of specific program areas to which Technical Specifications and license conditions are relevant. A specific program area audit ensures that operations comply with the Technical Specifications and license conditions at least once every 24 months. Additional audits or assessment activities may be specified based upon operations program performance, specific program area performance, or other factors that indicate the need for increased assessment of Technical Specification compliance.
- The performance, training, and qualification of the unit staff, “at least once per 12 months,” is changed to “at least once per 24 months.” Performance, training, and qualifications of the facility staff are routinely monitored in conjunction with ongoing audits and evaluations of specific program areas. A program area audit for facility staff training and qualification ensures that the training and qualification programs at WNP-2 are audited at least once every 24 months. Additional audits or assessment activities may be specified based upon training and qualification program performance, specific program performance, or other factors that indicate the need for increased assessment of staff training and qualification.
- The review of Effluent and Environmental Monitoring Programs and Radiological Environmental Monitoring Programs, “at least once per 12 months,” is changed to “at least once per 24 months.” This change is consistent with previous NRC position for a 24-month basic audit frequency, as discussed in NRC Administrative Letter 95-06, and is consistent with Regulatory Guide 1.33, Revision 2, and ANSI N18.7-1976/ANS-3.2.

Frequencies for audits of the Security, Safeguards Contingency, and Emergency Preparedness Programs were modified in accordance with revised regulations regarding Emergency Preparedness and Security audits contained in 10 CFR Parts 50 and 73. These changes were implemented to reflect changes to regulations and do not constitute a reduction in commitment. The changes are as follows:

- The audit frequency for the Security and Safeguards Contingency Programs, “at least once per 12 months,” was changed to “as defined by 10 CFR 50.54(p) and 10 CFR 73.55.” These changes were permitted due to changes in 10 CFR 50.54(p)(3), 10 CFR 73.55(g)(4), and 10 CFR 73 Appendix C, which became effective April 28,

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY  
ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004)  
REVISIONS 30, 31, 32, AND 33**

Attachment I

Page 6 of 10

1999, as described in Federal Register posting, Volume 64, Number 59, dated March 29, 1999.

- The audit frequency for the Emergency Preparedness Program, “at least once per 12 months,” is changed to “as defined by 10 CFR 50.54(t).” This change is permitted due to changes in 10 CFR 50.54(t), which became effective April 28, 1999, as described in Federal Register posting Volume 64, Number 59, dated March 29, 1999.

The 2-year (24-month) maximum frequency for audits represents a reasonable time frame for an overall, in-depth assessment of program areas at a mature operating nuclear facility and is consistent with the baseline audit frequency for safety-related activities discussed in ANSI N18.7-1976. But more importantly, the audit frequency is based upon the implementation of an effective performance-based approach to quality verification and assessment. Effective implementation of the Audit Program, as described in this change, will further enhance Energy Northwest’s capability to apply quality verifications and assessments to items and activities “to an extent consistent with their importance to safety” as described in 10 CFR 50, Appendix B, Criterion II. Effective implementation of the revised Audit Program will also allow Energy Northwest to apply oversight resources where the Quality Department can be most effective in improving safety and performance.

Audits will continue to be performed under the cognizance of the Corporate Nuclear Safety Review Board in accordance with Appendix III of the OQAPD and site-wide administrative procedures. Audits will continue to be conducted in accordance with existing Energy Northwest commitments to Regulatory Guide 1.1.44/ANSI N45.2.12-1977 and will continue to be conducted under the direction of Lead Auditors qualified in accordance with the existing Energy Northwest commitment to Regulatory Guide 1.146/ANSI N45.2.23-1978. The audit scope will continue to include, as a minimum, the program areas which implement the requirements of 10 CFR 50, Appendix B; the requirements of Regulatory Guide 1.33/ANSI N18.7-1976 (with exceptions and alternatives noted); and other program areas as required by regulation or regulatory commitment.

The changes described continue to satisfy the criteria of 10 CFR 50, Appendix B and are consistent with the QA commitments previously accepted by the NRC. The alternatives will further enhance the implementation of a performance-based approach for performing QA program verifications and audits, consistent with the applicable regulations, industry standards, and regulatory guidance.

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY ASURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004) REVISIONS 30, 31, 32, AND 33**

Attachment I

Page 7 of 10

**OQAPD, Revision 33**

Stipulations added to Section 2.2.7.f and Appendix II.5 were components of the SER that was used for Revision 32 of the OQAPD to add scheduling latitude for periodic activities. These two stipulations were overlooked when the SER was applied to changes in the OQAPD. Revised provisions of 10 CFR 50.54(a) and the guidelines of the Direct Final Rule of April 26, 1999, Section (ii) states that changes are not considered to be reductions in commitment if it is based on the use of a QA alternative or exception approved by an NRC safety evaluation, provided that the basis of the NRC approval are applicable to the licensee's facility. The noted stipulations were included in the basis for approval in the NRC SER for the Rochester Gas and Electric Company, R.E. Ginna Nuclear Power Plant, Docket No. 50-244 (SER dated July 22, 1998)(TAC NO. MA0391).

- Section 2.2.7.f, Regulatory Commitments, was changed to include a stipulation to the scheduling latitude applied to the performance of periodic activities. The stipulation requires that the next scheduled due date for such activities will be based on their originally scheduled date. The periodicity for these activities will not exceed the original commitment plus 90 days.
- Appendix II.5.4, Position Statement for Regulatory Guide 1.33, Revision 2, was changed to include a stipulation to the scheduling latitude position applied to internal audits. The stipulation states that the grace period will not be applied to audits of the Emergency Plan to satisfy the requirements of 10 CFR 50.54(t) and the Security Plan to satisfy the requirements of 10 CFR 50.54(p)(3), 73.56(g)(1) and (g)(2), and 10 CFR 73.55(g)(4).

The above stipulations should have been included in the change to Revision 32 of the OQAPD that added scheduling latitude of 25 percent, or 90 days, for periodic activities. Since Revision 32 was put into effect, on October 8, 1999, there have been no original scheduled performance dates changed as a result of applying the 90-day grace period and there have been no audits performed for Security or Emergency Preparedness activities. Therefore, Energy Northwest has not been out of compliance with the NRC SER used to apply scheduling latitude. These changes are more restrictive than the previous revision and do not constitute a reduction in commitment.

Table 2-2, Operational QA Program Description Implementing Site Wide Procedures, was changed to add procedures SWP-PUR-04, Material Equipment Parts and Supplies Procurement, and SWP-SNM-01, Special Nuclear Material Control. This change is administrative and does not affect previous commitments.

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004) REVISIONS 30, 31, 32, AND 33**

Attachment I

Page 8 of 10

Appendix II.5, II.9, II.16, and II.17 were changed regarding scheduling latitude for performance of periodic activities. These changes are extensions of the change made to Revision 32 of the OQAPD, Section 2.2.7.f, which added scheduling latitude of 25 percent, or 90 days, whichever is shorter, that may be applied to performance of periodic activities (annual supplier evaluations, triennial vendor audits, re-certification in accordance with ANSI N45.2.23-1978, annual evaluation in accordance with ANSI N45.2.6-1978, and internal audits in accordance with ANSI N18.7-1976). This change adds the scheduling latitude to the Appendix II position statements for each of the activities noted in Section 2.2.7.f. This change is a clarification of language contained in Section 2.2.7.f and does not constitute a change in commitments. The Appendix II changes are as follows:

- Appendix II.5.4, Position Statement for Regulatory Guide 1.33, Revision 2, Quality Assurance Program Requirements, was changed to apply a grace period of 90 days to the 24-month audit frequency for internal audits described in Section 4.5 of ANSI N18.7-1976.
- Appendix II.9.4, Position Statement for Section 2.3 of ANSI N45.2.6-1978, Qualifications of Nuclear Power Plant Inspection, Examination, and Testing Personnel, was changed to apply a 90-day grace period to the annual re-qualification of inspection, examination, and testing personnel.
- Appendix II.16, Position Statement for Regulatory Guide 1.144, Rev. 1, Auditing of Quality Assurance Programs for Nuclear Power Plants, was changed to apply a 90-day grace period to triennial supplier audits and annual supplier evaluations performed in accordance with Section C.3.b(2) of Regulatory Guide 1.144, Revision 1.
- Appendix II.17, Position Statement for Regulatory Guide 1.146, (August 1980), Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants, was changed to add a 90-day grace period for Re-certification of Lead Auditors performed in accordance with Sections 3.2 and 5.3 of ANSI N45.2.23-1978.

The following changes to Appendix II.5.4 and Appendix III, Section 1.0, are reductions in QA Program commitments. However, the changes are allowed to be implemented prior to NRC approval as defined under the revised provisions of 10 CFR 50.54(a) and the guidelines of the Direct Final Rule of April 26, 1999, Section (ii) which states that a change is not considered a reduction in commitment with the use of a QA alternative or exception approved by a NRC safety evaluation, provided that the bases of the NRC approval are applicable to the licensee's facility. The effective changes are as follows:

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004) REVISIONS 30, 31, 32, AND 33**

Attachment I

Page 9 of 10

- Appendix II.5.4, Position Statement for Section 5.2.15 of ANSI N18.7-1976/ANS-3.2, was changed to replace the static two-year procedure review process with a dynamic review process that is already in place. This change modifies the biennial procedure review process from a static two-year review cycle that prevents the use of outdated or inappropriate documents, to a dynamic procedure review process that is already in place. The dynamic process ensures applicable procedures and instructions are reviewed for possible revision upon identification of new or revised source material. Programs are in place to determine if procedure revisions are required and when such changes are to be implemented. These programs serve to facilitate timely review of procedures while ensuring both their accuracy and up-to-date status. Some examples of the dynamic review process to identify the need for revisions to procedures include: use of controlled plant procedures, Technical Specification surveillance testing, plant modifications, control of nonconformance and corrective action, external operating experience review, vendors operating and maintenance manuals, Technical Specification, FSAR, ODCM change control process, revision of master data sheets and set points, conduct of infrequently performed tests or evolutions, conduct of licensing activities, and review committees. This change is consistent with the approved NRC SER for the revised Entergy QA Program applicable to License Docket Nos. 50-313, 50-368, 50-416, 50-458, and 50-382 (SER dated November 6, 1998)(TAC NO. M97893).
- Appendix III, Additional Quality Program Requirements, Section 1.0, Nuclear Safety Assurance Division, has been changed. The change replaces the name Nuclear Safety Assurance Division with Nuclear Safety Assurance Program (NSAP). The change more accurately describes the Independent Safety Engineering (ISEG) function as a program rather than a department or division of Energy Northwest. Although specific individuals are assigned to perform the NSA function, they report to the Quality Manager. There is no NSA division or department. Therefore, the title of the NSA function was changed from “Nuclear Safety Assurance Division” to “Nuclear Safety Assurance Program.” In addition, the wording “at least five, dedicated, full-time engineers” was changed to “several on-site personnel.” The previous wording was consistent with Regulatory Guide 0737, Clarification of TMI Action Plan Requirements, regarding staffing for the Independent Safety Engineering Group (ISEG) function. The change to replace staffing requirements for the NSA function is a reduction in commitment. However, the change is allowed by the Direct Final Rule in that the change is consistent with an approved NRC SER for the Pacific Gas and Electric Company, Diablo Canyon Power Plant Technical Specification

**ANNUAL SUBMITTAL OF CHANGES TO THE OPERATIONAL QUALITY  
ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004/ENQA-004)  
REVISIONS 30, 31, 32, AND 33**

Attachment I  
Page 10 of 10

Amendment applicable to License Docket Nos. 50-275 and 50-323 (SER dated March 7, 1994) (TAC Nos. M87689 and M87699).

This change is also consistent with the NRC guidance regarding independent technical review functions provided for line item improvements of facility Technical Specifications (Improved Standard Technical Specifications for GE BWR6 Plants, Reference 3). This change will allow better use of available technical talent and greater flexibility in the performance of the required nuclear safety assurance function. This change does not reduce the NSAP responsibilities or personnel qualifications. The Quality Department will continue to be responsible for the nuclear safety assurance functions and will provide plant and senior management with recommendations regarding improvements in nuclear safety. Plant operating characteristics, NRC Issues, industry advisories, Licensee Event Reports, and other sources that may indicate areas for improving plant safety will continue to be reviewed. Appropriate controls, such as reporting and implementing procedures, are in place to ensure the independence of the nuclear safety assurance function and to assure recommendations regarding nuclear safety improvements are properly dispositioned.

Appendix III.2.2, Corporate Nuclear Safety Review Board (CNSRB), was changed to clarify the qualifications and responsibilities of CNSRB members. The clarification aligns the OQAPD with the wording in ANSI N18.7-1976, Section 4.3.1 regarding Independent Review Board member qualification. The clarification of wording does not reduce the requirement for CNSRB qualifications or responsibilities and is not a reduction in commitment.

The changes described continue to satisfy the criteria of 10 CFR 50, Appendix B and are consistent with QA commitments previously accepted by the NRC.