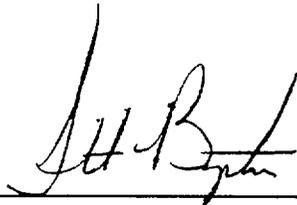


# OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004)

APPROVED:



*Manager, Quality*

*7/1/99*

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WASHINGTON PUBLIC POWER  
SUPPLY SYSTEM



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1 - ORGANIZATION

1.1 PURPOSE

This section provides a description of the authorities and responsibilities assigned to Supply System organizational units and individuals involved in establishing, implementing, verifying implementation, and measuring the overall effectiveness of the administrative controls and quality assurance program during the initial testing (pre-operational and startup testing) and subsequent operations phases of Supply System nuclear power plants.

1.2 SUPPLY SYSTEM ORGANIZATION

The Supply System organization responsible for establishing, implementing, verifying implementation, and measuring the overall effectiveness of the administrative controls and quality assurance program for its nuclear power plants is as depicted in Figures 1-1 and 1-2. Portions of these activities may be delegated to external organizations qualified to the requirements of this Operational QA Program, hereafter referred to as QA Program; however, the responsibility shall remain with the Supply System.

1.3 MANAGEMENT RESPONSIBILITIES

1.3.1 The Chief Executive Officer is responsible for the establishment of policies and for overall management of Supply System operations. The Chief Executive Officer has issued a Management Statement which commits the Supply System to design, construct, and operate its nuclear power plants without jeopardy to the health and safety of the public. The Chief Executive Officer has the responsibilities as the Chief Nuclear Officer, is the ultimate Supply System authority on matters involving Plant Nuclear Safety and Quality, and appoints the members of the Corporate Nuclear Safety Review Board (CNSRB), including the Chairman and Alternate Chairman. The Chief Nuclear Officer operates through: the Vice President, Generation/Plant General Manager; Vice President, Operations Support/Public Information Officer; Vice President, Administration/Chief Financial Officer; and General Counsel, to provide for engineering, construction, procurement, quality assurance/quality control, and operations activities for Supply System nuclear power plants.

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1.3.2 The Vice President, Generation/Plant General Manager reports to the Chief Executive Officer and is responsible for:

- Safe and efficient operation of WNP-2 and other generating power plants.
- Safe and successful completion of initial testing activities for WNP-2.
- Establishing and monitoring maintenance systems common to operational generating power plants.
- Qualifying and Training of plant staff and support personnel.
- Development of programs and procedures to ensure uniform application at operational generating power plants.
- Radiological protection, fire protection, and radioactive waste management.
- System Engineering support for maintenance and operation for WNP-2.
- Ensuring calibrated measuring and test equipment (including installed instruments covered by the Plant technical Specifications) is utilized at WNP-2.
- Dispositioning of nonconforming items.
- Implementing the in-service testing program.
- Administering the nonconforming condition and corrective action processing and in plant operating experience. Assisting the cognizant organization in evaluation and determination of the root cause for plant-related events.

To accomplish this role, the Vice President, Generation/Plant General Manager operates through the WNP-2 Production Manager, WNP-2 Maintenance Manager, Training Manager, and Technical Services/System Engineering Manager. The Generation/Plant organization and functional responsibilities of key organizational personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2.

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1.3.2.1 The WNP-2 Production Manager reports to the Vice President, Generation/Plant General Manager and is directly responsible for safe and efficient operation of the plant in accordance with the requirements of the Operating License, the Technical Specifications, and approved written procedures. Some of the specific responsibilities of the WNP-2 Production Manager are:

- Ensuring safe plant operation and control of plant systems in compliance with licensing documents..
- Implementing the Radiation Protection Program.
- System chemistry optimization and control.
- Gaseous and liquid effluent releases.
- Off-Site Dose Calculation Manual (ODCM).
- Radwaste processing and chemical control.
- The Radiological Environmental Monitoring Program and Bioassay Program.
- Environmental sciences function which performs nonradiological monitoring and fitness for duty chemical analysis.

The WNP-2 Production Manager operates through the Operations Manager, Radiological Services Manager, and the Chemistry Manager.

1.3.2.2 The WNP-2 Maintenance Manager reports to the Vice President, Generation/Plant General Manager and is responsible for the WNP-2 Maintenance Program, the development and implementation of maintenance processes and procedures, and planning, scheduling and coordination of work during operation and outage periods.

1.3.2.3 The Technical Services/Systems Engineering Manager reports to the Vice President, Generation/Plant General Manager and is responsible for overall direction of the system engineering program in support of plant operation, maintenance, and chemistry in areas of NSSS systems, control/electrical systems, and BOP systems.

1.3.2.4 The Nuclear Training Manager reports to the Vice President, Generation/Plant General Manager and is responsible for nuclear training policy and implementation, fire prevention and protection training, technical maintenance of the simulator to support operator training and testing, and training records management for nuclear plant operations.

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1.3.3 **The Vice President, Operations Support/Public Information Officer reports to the Chief Executive Officer and is responsible for the development and implementation of policies and programs which support operation of Supply System nuclear power plants in the areas of:**

- **Quality Assurance program definition, implementation and effectiveness.**
- **Maintaining cognizance of changing regulatory requirements and providing controlled interface between the Supply System and regulatory agencies to assure that commitment documents receive the necessary degree and depth of reviews prior to transmittal.**
- **Providing licensing support functions in such areas as acquisition and maintenance of nuclear power plant construction permits and operating licenses.**
- **Safeguards, physical plant security and fitness for duty.**
- **Emergency preparedness, safety and health.**
- **Reviewing in-house and external events for determination of cause and necessary corrective action to minimize potential for recurrence at Supply System nuclear facilities.**

To accomplish this role, the Vice President operates through the Manager, Quality; Manager, Regulatory Affairs; Manager, Security; and Manager, Engineering.

1.3.3.1 **The Manager, Quality reports to the Vice President, Operations Support/PIO and is directly responsible for the definition, direction, and effectiveness of the overall Quality Assurance Program during design, construction, and operation phases of all Supply System nuclear power plants. Major functions of the Quality organization are:**

- **Establishing and maintaining assurance programs, Nuclear Operation Standards, and department procedures and instructions which incorporate nuclear safety considerations and comply with the Quality Assurance (QA) criteria delineated in Appendix B to 10CFR 50.**
- **Assuring through reviews, surveillances, assessments, inspections, and audits that Supply System and its suppliers' activities are being performed in a safe and legal manner in accordance with written and approved documents which comply with applicable requirements defined by the assurance programs and Nuclear Operation Standards or Site Wide Procedures.**

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- Assessing the overall effectiveness of assurance programs' implementation, including evaluation of plant performance and reporting conclusions to the Chief Executive Officer.
- Stopping unsatisfactory work and controlling further processing, delivery, or installation of nonconforming material.
- Establishing and maintaining adequate and qualified assurance staffing levels.
- Providing periodic trending of nonconformancies to identify areas where corrective actions have not minimized recurrence.
- Establishing, maintaining, and controlling the Operational QA Program Description (WPPSS-QA-004) and the Supply System Functional Manual for Nuclear Operation.
- Qualifying and certifying Supply System Audit Team Leaders, QC inspection, non-destructive examinations and test personnel.
- Acquiring and maintaining ASME Certificates of Authorization and/or Owners Certificates.
- Ensuring that a written agreement with an Authorized Inspection Agency is obtained to provide for Authorized Nuclear In-Service Inspection Services.
- Administering the WNP-2 industry operating experience program.
- Providing the Independent Safety Engineering Group (ISEG) functions for assessing programs, processes and activities of various areas and operations that affect plant nuclear safety and reliability.
- Providing the review and concurrence of selected programs, procedures, and/or instructions affecting safety, including changes thereto, to assure that applicable quality assurance requirements have been identified and specified therein.

The Manager, Quality has effective communication channels with all Supply System senior management positions and has no duties or responsibilities unrelated to quality assurance that would prevent his full attention to Quality Assurance Program matters. To accomplish the above defined role, the Manager, Quality operates through the Supervisors, Quality Services; Supervisor, Quality Programs; and Lead, Supplier Quality.

The qualification requirements for this position are as described in Appendix I, Qualification Requirements.



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A management representative from the Quality Organization is a member of the Plant Operations Committee (see Appendix III) and has sufficient authority and organizational freedom to identify problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions. The representative has no duties or responsibilities unrelated to quality assurance matters and has effective communication channels with all plant supervisory and management personnel.

- 1.3.3.1.1 The Supervisors, Quality Services report to the Manager, Quality and are directly responsible for performing internal Supply System quality assurance functions that are necessary to verify that the QA Program is being effectively implemented. This includes maintaining a sufficient number of qualified auditors to perform QA audits, as required.

Each Supervisor has the authority and responsibility to stop unsatisfactory work and control further processing, delivery, or installation of nonconforming material. When the unit is operating, the Supervisors may recommend that the unit be shut down; the Vice President Generation/Plant General Manager, however, has the final responsibility for the overall evaluation of all aspects and implications of shutting down the operating unit.

Qualification requirements for this position is described in Appendix I, Qualification Requirements. The Supervisors, Quality Services are specifically responsible for:

- a. Verifying internal Supply System activities to assure that they are being conducted in a safe and legal manner in accordance with approved programs, plans, procedures, or instructions. Such verifications will be in the form of audits, technical assessments, or quality assurance surveillances. Included in the scope of these verifications are: (i) control room operations; post modification/major maintenance testing and operational tests; maintenance, modification, repair, and calibration; personnel training; and refueling activities; (ii) activities associated with satisfying technical specifications and in-service inspection and testing; (iii) activities associated with the implementation of security, fire protection, and radiological protection programs; (iv) activities including engineering, maintenance, modifications, operational problem resolution, technical support activities, and operational analysis that affect plant nuclear safety and reliability; and (v) activities related to procurement, storage and issuance of parts, materials, and services to assure implementation of QA Program and management requirements.

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- b. Providing the Independent Safety Engineering Group (ISEG) functions as described in Appendix III, Section 1.0.

1.3.3.1.2 The Supervisor, Quality Programs reports to the Manager, Quality and is directly responsible for:

- In plant QC functions.
- Certifying Supply System nondestructive examination, QC, and test personnel.
- Maintaining Quality Program documents.

Qualification requirements for this position are described in Appendix I, Qualification Requirements.

1.3.3.1.3 The Lead, Supplier Quality reports to the Manager, Quality and is directly responsible for the source surveillance/audit program and for assuring that items received for WNP-2 meet the required quality standards, including:

- Establishing vendor witness points for inspection and release of material/equipment for shipment.
- QC receipt inspection of materials and equipment received by the Supply System.
- Establishing and maintaining evaluated vendors list.
- Planning, coordinating, and performing source surveillances, source inspections, and external audits to verify implementation of vendors' QA/QC programs.
- Reviewing and approving vendor furnished QA/QC procedures and programs.
- Reviewing for acceptance other utility audits furnished through the Nuclear Procurement Issues Committee (NUPIC).

Qualification requirements for this position are described in Appendix I, Qualification Requirements.

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1.3.3.2 The Manager, Regulatory Affairs reports to the Vice President, Operations Support/PIO and is responsible for:

- Acquiring and maintaining operating licenses of Supply System nuclear power plants.
- Defining and implementing programs which assure that licensing submittals receive an adequate technical review from cognizant Supply System, NSSS, or AE personnel prior to transmittal.
- Tracking licensing commitments and taking action necessary to assure that they are being met in a timely manner.
- Providing coordinated development of responses and comments to new laws, regulations, regulatory guides, and other regulatory issuances.
- Developing and maintaining an emergency response program that includes plans, implementing procedures, training, and drills and exercises.

1.3.3.3 The Engineering Manager reports to the Vice President, Operations Support/Public Information Officer and is responsible for providing project engineering and design control, nuclear fuel supply, and maintenance/operation engineering support as required for WNP-2. The Engineering Manager is specifically responsible for:

- Developing, maintaining, and implementing design control programs and processes by which plant design, and design changes, and modifications are defined, controlled, and verified.
- Developing and maintaining programs for in-service inspection, nondestructive evaluation, and materials and welding engineering.
- Providing engineering support for technical resolution of nuclear safety and licensing issues.
- Maintaining a current engineering data base for WNP-2.
- Implementing configuration control by establishing site-specific policy, procedures, and methods that allow control and accountability.
- Management of major plant modifications, major maintenance tasks, and contractor support.
- The supply, engineering, and efficient in-core management of nuclear fuel.



- Transient analysis and licensing issue resolution to support technical specification changes and reload fuel licensing.
- Reliability and availability analysis to improve plant performance, safety, and maintainability.
- Developing and maintaining fire protection programs.
- Training and qualification of engineering and technical support staff.

The Engineering Manager operates through the Manager, Design Engineering; Manager, Major Projects; and Manager, Reactor/Fuels Engineering. The Engineering organization and functional responsibilities of key personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2.

1.3.3.4 The Manager, Security Programs reports to the Vice President, Operations Support/ PIO and is responsible for overall Supply System security activities. The Manager, Security Programs is specifically responsible for:

- Administering a security program which includes preemployment screening, physical security surveys and investigations, loss prevention, and fitness for duty.
- Managing the security force by assuring that physical security is consistent with needs and is maintained within individual plant safeguards security plans.
- Providing training, administrative, and technical support to the Plant General Manager in the area of plant security.

1.3.4 The Vice President Administration/Chief Financial Officer reports to the Chief Executive Officer and is responsible for providing Administrative Services that are required to Support Operation and Maintenance of WNP-2 and establishing, managing, and administrating the implementation and effectiveness of the Nuclear Safety Issues Program (NSIP). To accomplish this role, the Vice President operates through the Manager, Administrative Services.

1.3.4.1 The Manager, Administrative Services reports to the Vice President, Administrative/Chief Financial Officer and is responsible for:

- Developing and implementation of administrative controls for plant procedures, processes and systems to maintain nuclear plant design, construction, and operating records.



- Providing program definition and policy development for Supply System records management activities, which includes processing, retrieval, storage and dispositioning of records.
- Providing administrative support functions necessary for the maintenance of manuals and procedures.
- Managing an administrative process by which engineering-related activities and commitments are assigned, scheduled, tracked, and dispositioned.

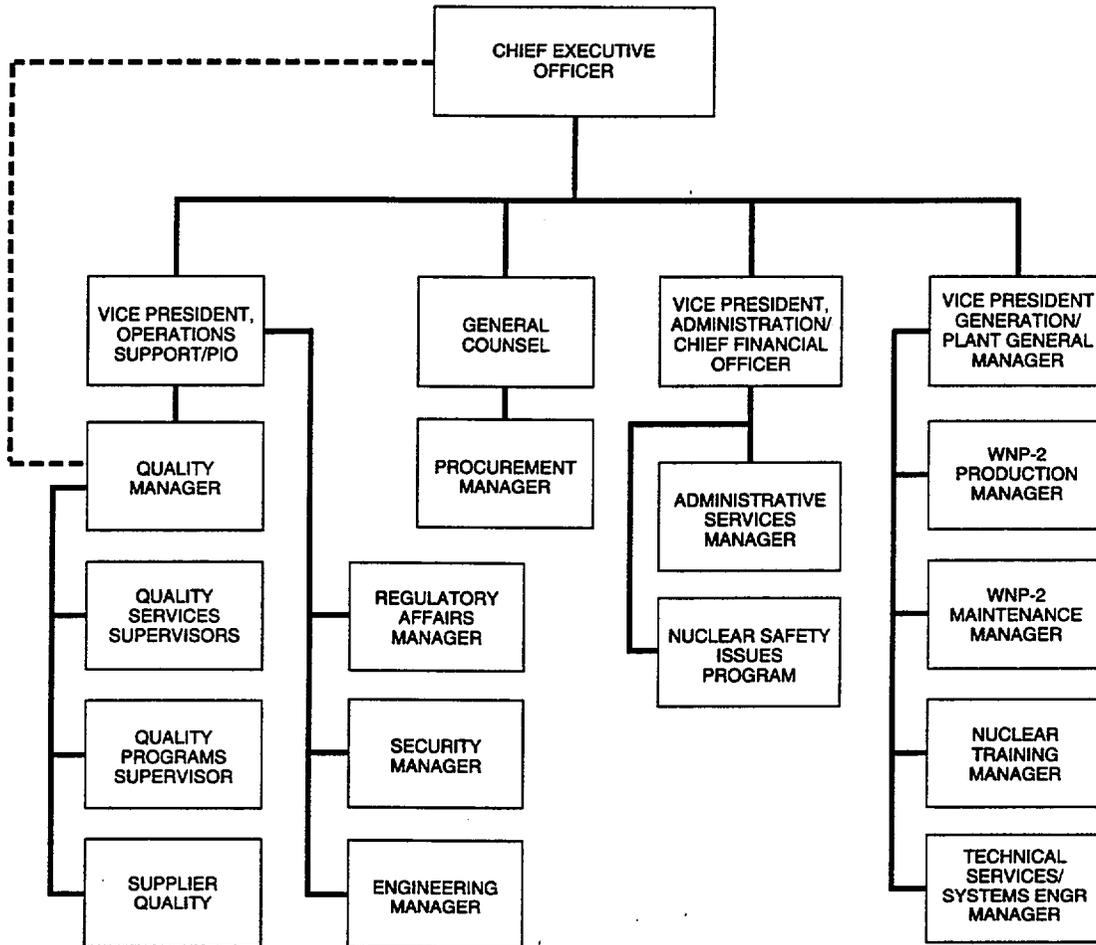
1.3.5 The General Counsel reports to the Chief Executive Officer and is responsible for providing procurement, inventory, spare parts engineering, and warehousing that are required to support operation and maintenance of WNP-2. To accomplish this role, the General Counsel operates through the Manager, Procurement.

1.3.5.1 The Manager, Procurement reports to the General Counsel and is responsible for contracting, procurement and storage control services that support operation and maintenance of Supply System nuclear power plants, the sale and demolition of Projects WNP-1, WNP-3, WNP-4 and WNP-5. These responsibilities include:

- Development of Supply System procurement policies and procedures.
- Procurement of items and services in response to approved purchase requisitions.
- Coding, cataloging, handling, storage, shipping, and disposal of procured items.
- Providing project management for disposition of assets from terminated power projects and disposition of major assets surplus to operating power projects.
- Maintaining the Restricted Use Equipment List (RUEL).
- Providing criteria for Class 1 and commercial grade dedicated spare parts procurement.

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**FIGURE 1-1**

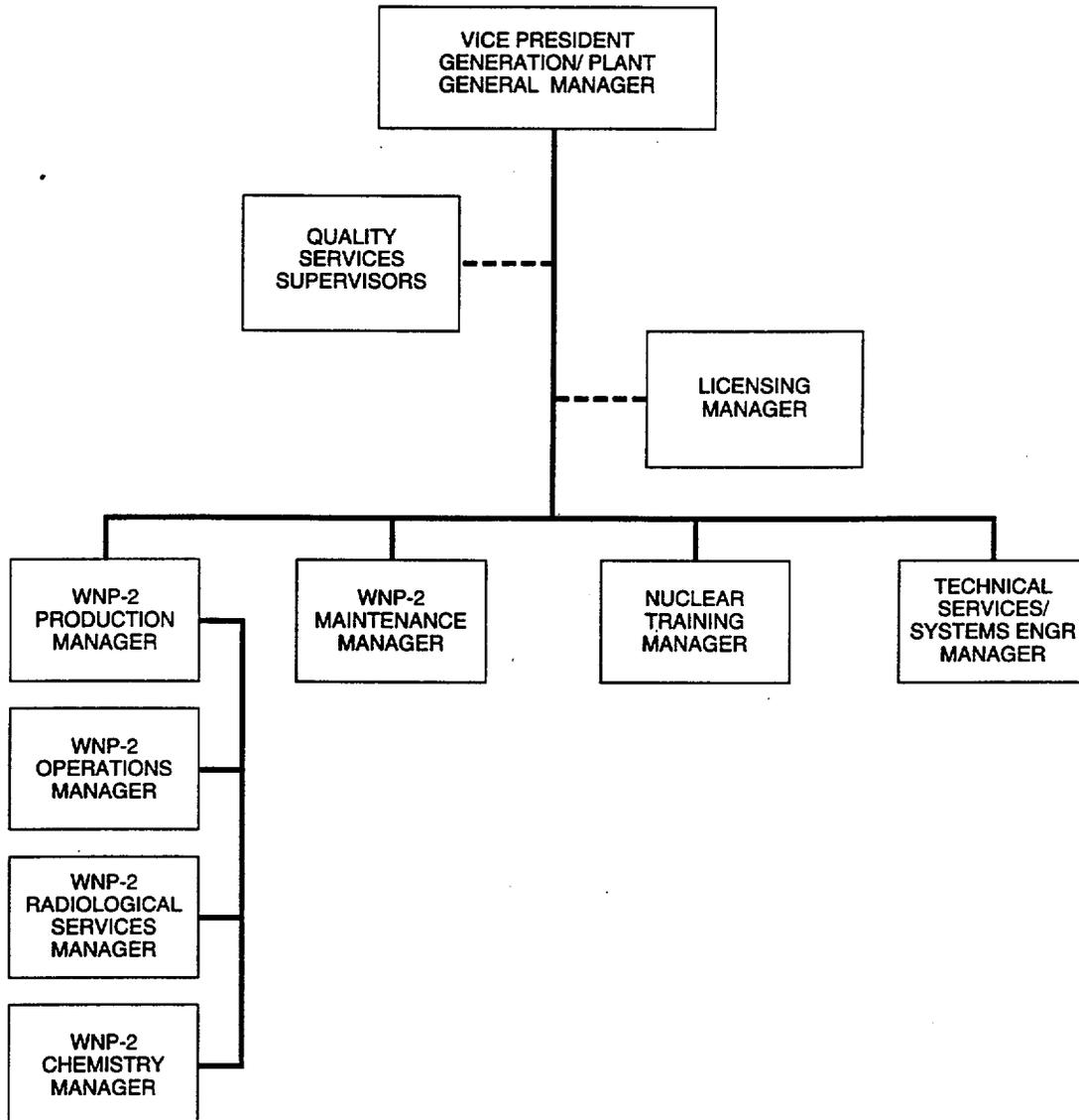


— ADMINISTRATION AND FUNCTIONAL REPORTING  
 - - - COMMUNICATION LINES

890853.1

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FIGURE 1-2



— ADMINISTRATIVE AND FUNCTIONAL REPORTING

- - - - COMMUNICATION LINES

**Supply System Organization  
Relative To Operational QA**

890853.2

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## 2-QUALITY ASSURANCE (QA) PROGRAM

### 2.1 PURPOSE

This section provides an overall description of the QA Program that will be applied to initial testing and subsequent operation and maintenance activities throughout the life of Supply System nuclear power plants.

### 2.2 GENERAL

- 2.2.1 The QA Program will be implemented through a series of Nuclear Operation Standards (NOSs) contained in the Supply System Functional Manual for Nuclear Operation. In turn, these NOSs will be implemented by Supply System organizational procedures, programs, or plans which prescribe detailed methods for functional accomplishment. The NOSs will address the applicable requirements of Appendix B to 10CFR50 is included in Table 2-1. The NOSs and implementing procedures, programs, or plans will collectively comply with the regulatory positions of QA-related Regulatory Guides as identified and modified in Appendix II, Position Statements and the additional Quality Program requirements as identified in Appendix III. The NOSs are being replaced by Site Wide Procedures (SWPs). These procedures contain the same information currently in the NOSs, and implement the QA Program. Table 2-2 lists the SWPs and are cross referenced to the criteria of 10CFR50, Appendix B.
- 2.2.2 A list of safety-related items that will be subject to the applicable controls of the QA Program is included in the Final Safety Analysis Report (FSAR) for the applicable Supply System nuclear power plant. Changes to this listing shall be controlled by the Engineering, Manager and approved by the Plant General Manager.
- 2.2.3 Applicable provisions of the QA Program shall be implemented by the earliest of the following and shall remain in effect for the life of Supply System nuclear power plants:
- a. Prior to inception of the activity.
  - b. At the time of temporary/permanent transfer of system/component custody to Test and Startup organization.
  - c. Ninety (90) days prior to initial fuel loading.

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2.2.4 Revision to the QA Program will be made by the Quality organization as follows:

- a. Proposed changes to the QA Program will be evaluated to determine whether or not they would result in a reduction of commitments previously accepted by the Nuclear Regulatory Commission (NRC).
- b. Changes that do not reduce the commitments may be implemented prior to forwarding such changes to the NRC. However, all such changes shall be forwarded to the NRC at least annually.
- c. Changes that reduce commitments will be forwarded to the NRC for their review and acceptance prior to implementation. Such changes shall be regarded as accepted by the NRC upon receipt of a letter from the NRC to this effect or sixty (60) days after submittal to the NRC, whichever occurs first.

2.2.5 Managers of Supply System organizations responsible for implementing the applicable provisions of the QA Program shall assure that activities that affect safety-related functions of plant items are performed by personnel who have been indoctrinated and trained. The scope, objective, and method of implementing the indoctrination and training program shall be documented. Proficiency of personnel performing activities that affect safety-related functions of plant items shall be maintained by retraining, re-examination, and/or recertifying, as applicable. Methods shall be provided for documenting training.

2.2.6 The scope, implementation, and effectiveness of the QA Program is routinely audited by the Quality organization. Copies of audit reports are presented to Supply System management to provide for assessment of the effectiveness of the QA Program. Additionally, at least once per two (2) years, the Supply System management arranges for an independent evaluation of the adequacy of the scope, implementation, and effectiveness of the QA Program. This is accomplished by knowledgeable personnel outside of the Quality organization to assure achievement of an objective program assessment. Results of these independent evaluations are reported to the Chief Executive Officer, Vice President, Generation/Plant General Manager, and Vice President, Operations Support/PIO.



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TABLE 2-1  
OPERATIONAL QA PROGRAM DESCRIPTION  
IMPLEMENTING NUCLEAR OPERATION STANDARDS  
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Nuclear Operation Standards		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
NOS-1	Organizational Responsibilities.Changes	X																	
NOS-2	Control of the Functional Manual for Nuclear Operation	X				X	X												
NOS-3	Operational QA Program Description Control	X					X												
NOS-4	Plant Operations and Maintenance Control	X		X			X		X	X			X	X	X				
NOS-5	Personnel Training, Qualification and Certification	X	X								X								
NOS-6	Review Committees (CNSRB & POC)	X																	
NOS-8	Nuclear Safety Assurance Assessment Program	X																	
NOS-9	Procedures/Instructions Control	X		X		X	X												
NOS-11	Conduct of Licensing Activities	X					X												
NOS-13	Reporting of Incidents	X		X															
NOS-14	Operating Experience Review	X																	
NOS-19	Plant QC Inspection Program	X									X	X							
NOS-20	Quality Assurance Evaluations	X														X	X		X
NOS-21	ASME Pressure Boundary Work	X		X			X	X	X	X	X	X		X	X				
NOS-22	Q-List Control	X		X															
NOS-23	Plant Modification Control	X		X		X					X								
NOS-24	Control of Records	X																	X
NOS-26	Computer Software QA	X		X		X													
NOS-27	Procurement and Storage Control	X			X		X	X						X					
NOS-30	Control of Nonconformances and Corrective Action	X		X			X								X	X	X		
NOS-32	Configuration Management Program	X		X			X												
NOS-33	Inservice Inspections	X					X			X	X	X							
NOS-34	Inservice Testing of Pumps and Valves	X					X				X								
NOS-35	Nuclear Materials Control	X													X				
NOS-36	Chemistry	X													X				
NOS-37	Rad. Environmental Mon. Program	X													X				
NOS-39	Fire Protection Program	X													X				
NOS-41	QA Program for Radioactive Materials Shipping Packages	X																	
NOS-45	Simulator Certification	X	X	X			X					X			X				



**TABLE 2-2**  
**OPERATIONAL QA PROGRAM DESCRIPTION**  
**IMPLEMENTING SITE WIDE PROCEDURES**

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Site Wide Procedures		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
SWP-PRO-01	Procedure/Instruction Use	X		X		X	X												
SWP-PRO-2	Prep./Review/Approval of Procedures	X		X		X	X												
SWP-PRO-03	Procedure Writer's Manual					X													
SWP-PUR-01	Procurement of Services	X			X		X	X						X					
SWP-PUR-03	Restricted Use Equipment List (RUEL)				X			X											
SWP-PUR-05	Emergency Purchasing				X			X											
SWP-PUR-02	Procurement Technical Reviews	X		X															
SWP-PUR-04	Material Equipment Parts, and Supplies Procurement	X		X	X	X			X				X	X					X
SWP-MMP-01	Control of Ageable Items													X					
SWP-MMP-02	Warehousing							X						X					
SWP-MMP-03	Packaging and Shipping of Material and Equipment							X						X					
SWP-ASU-01	Evaluations of Programs, Processes and Suppliers	X														X	X		X
SWP-FPP-01	Nuclear Fire Protection Program	X	X	X	X	X		X			X	X			X	X	X	X	X
SWP-IRP-01	Plant Operations Committee	X																	
SWP-IRP-02	Corporate Nuclear Safety Review Board	X																	X
SWP-DOC-01	Document Control					X	X												
SWP-EPP-01	Emergency Response Organization and Training	X	X																
SWP-MAI-01	Work Management Planning Scheduling and Work Activities	X				X	X				X	X				X	X		
SWP-OPS-03	Plant Clearance Orders	X													X				
SWP-REC-01	Records Management	X																	X
SWP-RMP-02	Radiation Waste Process Control Program	X	X														X	X	
SWP-TQS-01	Training, Qualification and Simulators	X	X								X								
SWP-CSW-01	Software QA Program	X		X			X												
SWP-CSW-02	WNP-2 Software Control	X		X			X												
SWP-INS-01	Quality Control Inspection and Peer Verification	X							X	X									



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#### 4-PROCUREMENT DOCUMENT CONTROL

##### 4.1 PURPOSE

This section sets forth requirements for preparation, review, and approval of procurement documents and changes thereto in order to control the quality of vendor furnished safety-related plant items and services.

##### 4.2 GENERAL

- 4.2.1 Procedures/instructions shall be established and implemented to control procurement-related activities such as procurement planning; preparation, review, approval and control of procurement documents; vendor selection; bid evaluations; and review and concurrence of vendor's quality assurance programs. These procedures/instructions shall clearly delineate the sequence of actions to be accomplished in the preparation, review, and approval of procurement-related documents and shall identify those positions or groups responsible for performing those actions.
- 4.2.2 Procurement documents for items (other than commercial grade off-the-shelf items, as defined in 10CFR21) and for services shall require, where necessary, vendors or subvendors to have a quality assurance program consistent with the applicable provisions of the QA Program.
- 4.2.3 As deemed necessary, the procurement documents will provide for right of access to the vendor's facilities and records for source inspections/audit by Supply System or its designee.
- 4.2.4 Procurement documents shall contain or reference applicable technical requirements (such as regulations, specifications, drawings, codes, and standards), test and inspection requirements, and special process instructions that must be complied with by vendors.
- 4.2.5 Procurement documents shall contain, as applicable, requirements which identify the documentation (such as drawings, specification, inspection and test records, personnel and procedure qualifications, Certificates of Conformance or equivalent certifications, and material chemical and physical test results) to be prepared, maintained, submitted, or made available to Supply System for review and/or approval.



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- 4.2.6 Procurement documents shall be reviewed by independent Procurement personnel. This review will be performed and documented to assure that quality requirements are correctly stated; that they can be inspected and controlled; the vendor is on the current Supply System Evaluated Supplier List; and the procurement documents have been prepared to incorporate appropriate provisions of 4.2.2 through 4.2.5. Quality personnel shall review procurement documents on a sampling basis, either during visits to vendors facilities, or during audits/surveillances, or at receiving inspection.
- 4.2.7 Changes (other than those that are of administrative nature) to approved procurement documents shall be subjected to the same degree of control that was applied during the preparation of original procurement documents.

**OPERATIONAL**  
**QUALITY ASSURANCE PROGRAM DESCRIPTION****12.- CONTROL OF MEASURING AND TEST EQUIPMENT****12.1. PURPOSE**

This section sets forth the requirements to establish those measures which will assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are controlled, calibrated, and adjusted at specified periods in order to maintain accuracy within necessary limits.

**12.2. GENERAL**

12.2.1. Measuring and test equipment (M&TE) shall be calibrated and adjusted using approved procedures/instructions.

12.2.2. A calibration program for the control and use of M&TE shall be established, and implemented. This program, as a minimum, shall provide for:

- a. Unique identification of the item and its traceability to the calibration test data.
- b. Labeling or tagging (or otherwise controlling) to indicate the due date of the next calibration.
- c. Calibration technique and frequency.
- d. Generation and maintenance of records which indicate the complete listing of all items under the calibration system together with their current calibration status.
- e. Controlled environment conditions for sensitive and close tolerance M&TE.

12.3. M&TE shall be calibrated against certified calibrating standards having known valid relationships to nationally recognized standards. If no national standards exist, the basis for calibration will be documented.

12.4. Standards adequacy will be determined by computing the ratio of test instrument tolerance to standard tolerance (Test Uncertainty Ratio, or TUR). A TUR of 4:1 or greater is considered acceptable. TURs of less 4:1 will be handled on a case by case basis, either by widening the test instrument tolerance (with the concurrence of the customer), or by mathematically reducing the test instrument tolerance to provide the same level of confidence as a 4:1 ratio. Other methodologies may be employed with the concurrence of the customer, including a statement of uncertainty or documentation of the actual ratio, if less than 4:1. The method used will be documented.

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- 12.5. M&TE shall be calibrated and maintained at specified periods based on the required accuracy, purpose, stability characteristics, and other conditions affecting the measurement.
- 12.6. When an item of M&TE is found to be out of calibration, an evaluation shall be made and documented to determine the validity of previous inspection/test results and the disposition to be made of items previously inspected/tested.

**OPERATIONAL  
QUALITY ASSURANCE PROGRAM DESCRIPTION****17 - QUALITY ASSURANCE RECORDS****17.1 PURPOSE**

This section sets forth requirements for generation, transmittal, retention, and maintenance of quality assurance records for Supply System's nuclear power plants.

**17.2 GENERAL**

17.2.1 Sufficient records shall be maintained to furnish evidence of the quality of safety-related plant items and activities. As a minimum these records shall include the following:

- a. Operating logs
- b. Results of design reviews, inspections, tests, audits, and material analysis
- c. Monitoring of work performance
- d. Qualifications of personnel, procedures, and equipment.
- e. Drawings, specifications, procedures, and procurement documents.
- f. Nonconformance and corrective action reports
- g. Records as required by Appendix III, Section 4.0 and 5.0.

17.2.2 Inspection and test records shall identify the following where applicable:

- a. Inspector and/or data recorder
- b. The type of observation
- c. The date and results of inspection or test.
- d. Acceptability of results.
- e. The action taken to resolve any deficiencies noted.

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- 17.2.3 Quality assurance records shall be generated (prepared, reviewed, and approved), accumulated, transmitted for incorporation into the records retention system, retained, maintained, and controlled in accordance with documented procedures and/or instructions.
- 17.2.4 The quality assurance records shall be organized and filed so that each document is identifiable and retrievable.
- 17.2.5 The quality assurance records shall be filed and maintained in facilities that provide protection from possible deterioration or damage and shall be controlled to prevent loss.



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APPENDIX I

QUALIFICATION REQUIREMENTS

The minimum qualification requirements for key Quality Assurance personnel that will be met at the time of initial core loading or appointment to the active positions are specified below.

I.1. The Manager, Quality or both Supervisors, Quality Services fulfill the position described in ANSI/ANS-3.1-1978, Section 4.4.5, Quality Assurance. The qualifications for this position are:

- a. Education: Bachelors Degree or equivalent\* in Engineering or related science.
- b. Six (6) years experience in the field of quality assurance, or equivalent number of years of nuclear industry experience in a supervisory/management position or a combination of the two. At least two (2) years of these six years experience shall be nuclear power plant experience in the overall implementation of the quality assurance program. (This experience shall be obtained within the quality assurance organization.)

I.2. Quality Programs Supervisor or Lead, Supplier Quality

- a. Education: Bachelor Degree or equivalent\* in Engineering or a related science.
- b. Experience: Four (4) years of nuclear plant experience at an operating nuclear plant. At least one (1) of these four (4) years of experience shall be in the implementation of the quality assurance program through participation in the QA or QC function, or involvement in programs subject to QA/QC audits or inspections.

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\*Equivalency will be determined based upon an evaluation of the following factors:

1. High school diploma or GED.
2. Sixty (60) semester hours of related technical education taught at the college level (900 classroom or instructor conducted hours).
3. Qualified as an NRC senior operator at the assigned plant.
4. Four (4) years of additional experience in his area of responsibility.
5. Four (4) years of supervisory or management experience.
6. Demonstrated ability to communicate clearly (verbally and in writing).
7. Certification of academic ability and knowledge by corporate management.
8. Successful completion of the Engineer-In-Training examination.
9. Professional Engineer License.
10. Associated degree in Engineering or a related science.

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### APPENDIX III

#### "ADDITIONAL QUALITY PROGRAM REQUIREMENTS"

This Appendix identifies additional quality program requirements that were formally located in the WNP-2 Technical Specification, Section 6.0, Administrative Controls or in the FSAR. The following requirements have been incorporated by Supply System organizations into their procedures and/or instructions. This Appendix will be revised, when necessary, in accordance with the provisions of Section 2 of the QA Program.

#### 1.0 NUCLEAR SAFETY ASSURANCE DIVISION (NSAD)

1.1 The NSAD shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The NSAD shall make detailed recommendations for revised procedures, equipment and modifications, maintenance activities, operations activities, or other means of improving unit safety to the Quality Manager.

1.1.1 The NSAD shall be composed of at least five, dedicated, full-time engineers, with a minimum of three located on site. Each shall have a bachelor's degree in engineering or related science or qualifications meeting ANS.3.1. Draft Revision dated March 13, 1981, Section 4.2 or 4.4, or equivalent, as described in Section 4.1 and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

1.1.2 The NSAD shall be responsible for maintaining surveillance of unit activities to provide independent verification (not responsible for sign-off function) that these activities are performed correctly and that human errors are reduced as much as practical.

1.1.3 Records of activities performed by the NSAD shall be prepared, maintained, and forwarded each calendar month to the Quality Manager.

#### 2.0 REVIEW AND AUDIT

##### 2.1 PLANT OPERATIONS COMMITTEE (POC)

The POC shall function to advise the Plant General Manager on all matters related to nuclear safety.



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2.1.1 The POC shall be composed of individuals experienced in one of the following functional areas:

- |             |                         |
|-------------|-------------------------|
| Operations  | Administrative Services |
| Maintenance | Radiation Protection    |
| Engineering | Technical Services      |
| Quality     | Chemistry               |

2.1.2 The Plant General Manager, the POC Chairman, shall appoint, in writing, the POC Vice Chairman, and individual members. The qualifications of all members shall meet the requirements of ANSI/ANS-3.1-1981, Section 4.7, and have, cumulatively, expertise in the areas listed in 2.1.1, as a minimum.

2.1.3 All POC alternate members shall be appointed in writing by the POC Chairman or Vice Chairman to serve on a temporary basis.

2.1.4 The Plant Operations Committee shall meet at least once per calendar month and as convened by the POC Chairman or his designated alternate.

2.1.5 The quorum of the POC necessary for the performance of the POC responsibility and authority provisions of these requirements shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two alternates shall make up the quorum.

2.1.6 The POC shall be responsible for:

- a. Review of 10CFR50.59 Safety Evaluations associated with procedures and programs required by Technical Specification 5.4 and changes thereto.
- b. Review of all proposed tests and experiments that affect nuclear safety, as determined by the need for a 10 CFR 50.59 Safety Evaluation;
- c. Review of all proposed changes to the Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit system or equipment that affect nuclear safety, as determined by the need for a 10 CFR 50.59 Safety Evaluation;
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board;



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- f. Review of all REPORTABLE EVENTS, as specified in 10 CFR 50.73;
- g. Review of unit operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Corporate Nuclear Safety Review Board;
- i. Review of the Security Plan and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- j. Review of the Emergency Plan and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board; and
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

2.1.7 The POC shall:

- a. Recommend in writing to the Plant General Manager approval or disapproval of items considered under Appendix III, 2.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Appendix III, 2.1.6a. through e. constitutes an unreviewed safety question as defined in 10 CFR 50.59.
- c. Provide written notification within 24 hours to the Chief Nuclear Officer and the Corporate Nuclear Safety Review Board of disagreement between the POC and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Technical Specification 5.1.1.



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2.1.8 The POC shall maintain written minutes of each POC meeting that, at a minimum, document the results of all POC activities performed under the responsibility provisions of these Specifications. Copies shall be provided to the Chief Nuclear Officer and the Corporate Nuclear Safety Review Board.

**2.2 CORPORATE NUCLEAR SAFETY REVIEW BOARD (CNSRB)**

2.2.1 The CNSRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality Assurance practices.

The CNSRB shall report to and advise the Chief Nuclear Officer on those areas of responsibility in Appendix III, 2.2.7 and 2.2.8.

2.2.2 The CNSRB shall be composed of at least nine and no more than twelve members, appointed in writing by the Chief Nuclear Officer from his senior technical staff and/or from outside the Supply System. He shall designate from the members a Chairman and an Alternate Chairman. The qualifications of all members shall meet the minimum requirements of Section 4.7 of ANSI/ ANS 3.1-1981 and have, cumulatively, expertise in the areas listed in Appendix III, 2.2.1, as a minimum.

2.2.3 All alternate members shall be appointed in writing by the CNSRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNSRB activities at any one time.

2.2.4 Consultants shall be utilized as determined by the CNSRB Committee to provide expert advice to the CNSRB.

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- 2.2.5 The CNSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.
- 2.2.6 The quorum of the CNSRB necessary for the performance of the CNSRB review and audit functions of these specifications shall consist of the Chairman or the alternate Chairman and at least four CNSRB members including alternates. The quorum shall consist of not less than the majority of the members, or duly appointed alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.
- 2.2.7 The CNSRB shall review:
- a. The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
  - b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
  - c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
  - d. Proposed changes to Technical Specifications or the Operating License;
  - e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instruction having nuclear safety significance;
  - f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
  - g. All REPORTABLE EVENTS, as specified in 10 CFR 50.73;
  - h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
  - i. Reports and meeting minutes of the POC.
  - j. Audit reports and summary reports of audits.



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- 2.2.8 Audits of unit activities shall be performed under the cognizance of the CNSRB. These audits shall encompass:
- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
  - b. The performance, training and qualifications of the entire unit staff at least once per 12 months;
  - c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
  - d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
  - e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licenses QA personnel;
  - f. The Emergency Plan and implementing procedures at least once per 12 months per 10 CFR 50.54(t).
  - g. The Security Plan and implementing procedures at least once per 12 months.
  - h. The fire protection equipment and program implementation, at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least once every third year; and
  - i. Any other area of unit operation considered appropriate by the CNSRB or the Chief Nuclear Officer.
  - j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
  - k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.



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- l. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- m. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

2.2.9 Records of CNSRB activities shall be prepared, approved, and distributed as indicated below:

- a. Items identified at each CNSRB meeting that require actions shall be identified and tracked. These actions shall be resolved in a time frame commensurate with their importance to safety.
- b. Minutes of each CNSRB meeting shall be prepared, approved, and forwarded to the Chief Nuclear Officer within 15 working days following each meeting.
- c. Reports of reviews encompassed by Appendix III, 2.2.7 above, shall be prepared, approved, and forwarded to the Chief Executive Officer within 15 working days following completion of the review.
- d. Audit reports encompassed by Appendix III, 2.2.8 shall be forwarded to the Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit.

**3.0 PROCEDURES AND PROGRAMS**

- 3.1 Each procedure of Technical Specification 5.4.1, and changes thereto, shall be reviewed and approved as specified by Appendix III, 4.0, prior to implementation and reviewed periodically as set forth in administrative procedures.
- 3.2 Temporary changes to procedures of Technical Specification 5.4.1a. through e. may be made provided:
  - a. The intent of the original procedure is not altered;
  - b. The change is approved by two members of the unit management staff, at least one of these individuals shall be the supervisor in charge of the shift and holds a Senior Operator license on the unit affected; and



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- c. The change is documented and reviewed by the appropriate member(s) of Plant management, within 14 days of implementation.

4.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

- 4.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 4.2 Each program and procedure required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two technical reviewers; i.e., the procedure sponsor and a Qualified Procedure Reviewer who are knowledgeable in the affected functional area. The Qualified Procedure Reviewer shall not be the individual who prepared the procedure or procedure change. The Qualified Procedure Reviewer, or procedure sponsor shall determine the need for cross disciplinary reviews. All required cross-disciplinary reviews of new procedures, procedure revisions or changes thereto shall be completed prior to approval.
- 4.3 Qualified Procedure Reviewer(s) shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions, with the exclusion of the positions identified in Section 4.3.1 and 4.5. Individuals whose positions are described in Section 4.3.1 and 4.5 may qualify as qualified procedure reviewers provided they meet the qualification described in other portions of Section 4.
- 4.4 Each program and procedure required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed to determine if a 10 CFR 50.59 Safety Evaluation is required. This review shall be accomplished by two individuals, who are knowledgeable in the affected functional area. These individuals shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for the applicable positions. Safety evaluations, when required, shall be reviewed by POC per OQAPD, Appendix III, 2.1.6.a.
- 4.5 Nuclear safety related procedures and procedure changes shall be reviewed and approved, prior to implementation, by the appropriate member(s) of management, as determined by the Plant General Manager and as specified in Administrative Control Procedures.
- 4.6 All changes to the Process Control Program (PCP) and the Offsite Dose Calculation Manual (ODCM) shall be reviewed by POC and approved by the Plant General Manager prior to implementation.



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**5.0 RECORD RETENTION**

A Records Disposition Program was established to manage the identification, retention, retirement and disposal of Supply System records and documents. Refer to the Records Disposition Program to insure compliance with various Federal and Washington State record retention requirements.

5.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

5.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities, inspections, and calibrations required by the Plant Technical Specifications.
- e. Records of changes made to the procedures required by Technical Specification 5.4.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

5.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report (FSAR).
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.



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- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Technical Specification 5.5.5.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to the Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Appendix III, 5.2.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the POC and the CNSRB.
- l. Records of the service lives of all hydraulic and mechanical snubbers required by WNP-2 Snubber Program including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analysis required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.



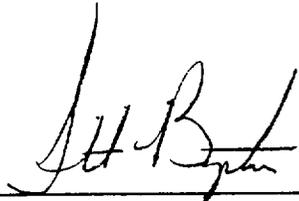
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**6.0 OPERATING EXPERIENCE**

**(TMI ITEM I.C.5)**

- 6.1 An Operating Experience (OE) Program is established and the program procedure describes how industry-operating experience is identified, reviewed, evaluated, and documented. The industry operating experience information includes, but is not limited to; NRC Bulletins and Notices, INPO Significant Operating Experience Reports, Significant Event Reports, Significant Event Notifications and vendor information, such as GE Service Information Letters.**
- 6.2 The Operating Experience program administrator will perform the initial document review. The information that is applicable to WNP-2 will be identified, evaluated and documented in accordance with the approved procedure. The operating experience information will be evaluated by the applicable knowledgeable organization. To prevent conflicting or contradictory information being conveyed to plant personnel, industry information processed via the Operating Experience Program is evaluated prior to use in the training program.**
- 6.3 Internal Operating Experience information identified via the Corrective Action Program will be evaluated for transmittal to the industry.**
- 6.4 Independent periodic evaluations of the Operating Experience review process will be performed by the Quality Organization.**

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- ORGANIZATION

1.1 PURPOSE

This section provides a description of the authorities and responsibilities assigned to Supply System organizational units and individuals involved in establishing, implementing, verifying implementation, and measuring the overall effectiveness of the administrative controls and quality assurance program during the initial testing (pre-operational and startup testing) and subsequent operations phases of Supply System nuclear power plants.

1.2 SUPPLY SYSTEM ORGANIZATION

The Supply System organization responsible for establishing, implementing, verifying implementation, and measuring the overall effectiveness of the administrative controls and quality assurance program for its nuclear power plants is as depicted in Figures 1-1 and 1-2. Portions of these activities may be delegated to external organizations qualified to the requirements of this Operational QA Program, hereafter referred to as QA Program; however, the responsibility shall remain with the Supply System.

1.3 MANAGEMENT RESPONSIBILITIES

- 1.3.1 The Chief Executive Officer is responsible for the establishment of policies and for overall management of Supply System operations. The Chief Executive Officer has issued a Management Statement which commits the Supply System to design, construct, and operate its nuclear power plants without jeopardy to the health and safety of the public. The Chief Executive Officer has the responsibilities as the Chief Nuclear Officer, is the ultimate Supply System authority on matters involving Plant Nuclear Safety and Quality, and appoints the members of the Corporate Nuclear Safety Review Board (CNSRB), including the Chairman and Alternate Chairman. The Chief Nuclear Officer operates through: the Vice President, Generation/Plant General Manager; Vice President, Operations Support/Public Information Officer; Vice President, Administration/Chief Financial Officer; and General Counsel, to provide for engineering, construction, procurement, quality assurance/quality control, and operations activities for Supply System nuclear power plants.

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1.3.2 The Vice President, Generation/Plant General Manager reports to the Chief Executive Officer and is responsible for:

- Safe and efficient operation of WNP-2 and other generating power plants.
- Safe and successful completion of initial testing activities for WNP-2.
- Establishing and monitoring maintenance systems common to operational generating power plants.
- Qualifying and Training of plant staff and support personnel.
- Development of programs and procedures to ensure uniform application at operational generating power plants.
- Radiological protection, fire protection, and radioactive waste management.
- System Engineering support for maintenance and operation for WNP-2.
- Ensuring calibrated measuring and test equipment (including installed instruments covered by the Plant technical Specifications) is utilized at WNP-2.
- Dispositioning of nonconforming items.
- Implementing the in-service testing program.
- Administering the nonconforming condition and corrective action processing and in plant operating experience. Assisting the cognizant organization in evaluation and determination of the root cause for plant-related events.

To accomplish this role, the Vice President, Generation/Plant General Manager operates through the WNP-2 Production Manager, WNP-2 Maintenance Manager, Training Manager, and Technical Services/System Engineering Manager. The Generation/Plant organization and functional responsibilities of key organizational personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2.

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- 1.3.2.1 **The WNP-2 Production Manager** reports to the Vice President, Generation/Plant General Manager and is directly responsible for safe and efficient operation of the plant in accordance with the requirements of the Operating License, the Technical Specifications, and approved written procedures. Some of the specific responsibilities of the WNP-2 Production Manager are:
- Ensuring safe plant operation and control of plant systems in compliance with licensing documents..
  - Implementing the Radiation Protection Program.
  - System chemistry optimization and control.
  - Gaseous and liquid effluent releases.
  - Off-Site Dose Calculation Manual (ODCM).
  - Radwaste processing and chemical control.
  - The Radiological Environmental Monitoring Program and Bioassay Program.
  - Environmental sciences function which performs nonradiological monitoring and fitness for duty chemical analysis.
- The WNP-2 Production Manager operates through the Operations Manager, Radiological Services Manager, and the Chemistry Manager.
- 1.3.2.2 **The WNP-2 Maintenance Manager** reports to the Vice President, Generation/Plant General Manager and is responsible for the WNP-2 Maintenance Program, the development and implementation of maintenance processes and procedures, and planning, scheduling and coordination of work during operation and outage periods.
- 1.3.2.3 **The Technical Services/Systems Engineering Manager** reports to the Vice President, Generation/Plant General Manager and is responsible for overall direction of the system engineering program in support of plant operation, maintenance, and chemistry in areas of NSSS systems, control/electrical systems, and BOP systems.
- 1.3.2.4 **The Nuclear Training Manager** reports to the Vice President, Generation/Plant General Manager and is responsible for nuclear training policy and implementation, fire prevention and protection training, technical maintenance of the simulator to support operator training and testing, and training records management for nuclear plant operations.

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1.3.3 The Vice President, Operations Support/Public Information Officer reports to the Chief Executive Officer and is responsible for the development and implementation of policies and programs which support operation of Supply System nuclear power plants in the areas of:

- Quality Assurance program definition, implementation and effectiveness.
- Maintaining cognizance of changing regulatory requirements and providing controlled interface between the Supply System and regulatory agencies to assure that commitment documents receive the necessary degree and depth of reviews prior to transmittal.
- Providing licensing support functions in such areas as acquisition and maintenance of nuclear power plant construction permits and operating licenses.
- Safeguards, physical plant security and fitness for duty.
- Emergency preparedness, safety and health.
- Reviewing in-house and external events for determination of cause and necessary corrective action to minimize potential for recurrence at Supply System nuclear facilities.

To accomplish this role, the Vice President operates through the Manager, Quality; Manager, Regulatory Affairs; Manager, Security; and Manager, Engineering.

1.3.3.1 The Manager, Quality reports to the Vice President, Operations Support/PIO and is directly responsible for the definition, direction, and effectiveness of the overall Quality Assurance Program during design, construction, and operation phases of all Supply System nuclear power plants. Major functions of the Quality organization are:

- Establishing and maintaining assurance programs, Nuclear Operation Standards, and department procedures and instructions which incorporate nuclear safety considerations and comply with the Quality Assurance (QA) criteria delineated in Appendix B to 10CFR 50.
- Assuring through reviews, surveillances, assessments, inspections, and audits that Supply System and its suppliers' activities are being performed in a safe and legal manner in accordance with written and approved documents which comply with applicable requirements defined by the assurance programs and Nuclear Operation Standards or Site Wide Procedures.

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- Assessing the overall effectiveness of assurance programs' implementation, including evaluation of plant performance and reporting conclusions to the Chief Executive Officer.
- Stopping unsatisfactory work and controlling further processing, delivery, or installation of nonconforming material.
- Establishing and maintaining adequate and qualified assurance staffing levels.
- Providing periodic trending of nonconformancies to identify areas where corrective actions have not minimized recurrence.
- Establishing, maintaining, and controlling the Operational QA Program Description (WPPSS-QA-004) and the Supply System Functional Manual for Nuclear Operation.
- Qualifying and certifying Supply System Audit Team Leaders, QC inspection, non-destructive examinations and test personnel.
- Acquiring and maintaining ASME Certificates of Authorization and/or Owners Certificates.
- Ensuring that a written agreement with an Authorized Inspection Agency is obtained to provide for Authorized Nuclear In-Service Inspection Services.
- Administering the WNP-2 industry operating experience program.
- Providing the Independent Safety Engineering Group (ISEG) functions for assessing programs, processes and activities of various areas and operations that affect plant nuclear safety and reliability.
- Providing the review and concurrence of selected programs, procedures, and/or instructions affecting safety, including changes thereto, to assure that applicable quality assurance requirements have been identified and specified therein.

The Manager, Quality has effective communication channels with all Supply System senior management positions and has no duties or responsibilities unrelated to quality assurance that would prevent his full attention to Quality Assurance Program matters. To accomplish the above defined role, the Manager, Quality operates through the Supervisors, Quality Services; Supervisor, Quality Programs; and Lead, Supplier Quality.

The qualification requirements for this position are as described in Appendix I, Qualification Requirements.



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A management representative from the Quality Organization is a member of the Plant Operations Committee (see Appendix III) and has sufficient authority and organizational freedom to identify problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions. The representative has no duties or responsibilities unrelated to quality assurance matters and has effective communication channels with all plant supervisory and management personnel.

- 1.3.3.1.1 The Supervisors, Quality Services report to the Manager, Quality and are directly responsible for performing internal Supply System quality assurance functions that are necessary to verify that the QA Program is being effectively implemented. This includes maintaining a sufficient number of qualified auditors to perform QA audits, as required.

Each Supervisor has the authority and responsibility to stop unsatisfactory work and control further processing, delivery, or installation of nonconforming material. When the unit is operating, the Supervisors may recommend that the unit be shut down; the Vice President Generation/Plant General Manager, however, has the final responsibility for the overall evaluation of all aspects and implications of shutting down the operating unit.

Qualification requirements for this position is described in Appendix I, Qualification Requirements. The Supervisors, Quality Services are specifically responsible for:

- a. Verifying internal Supply System activities to assure that they are being conducted in a safe and legal manner in accordance with approved programs, plans, procedures, or instructions. Such verifications will be in the form of audits, technical assessments, or quality assurance surveillances. Included in the scope of these verifications are: (i) control room operations; post modification/major maintenance testing and operational tests; maintenance, modification, repair, and calibration; personnel training; and refueling activities; (ii) activities associated with satisfying technical specifications and in-service inspection and testing; (iii) activities associated with the implementation of security, fire protection, and radiological protection programs; (iv) activities including engineering, maintenance, modifications, operational problem resolution, technical support activities, and operational analysis that affect plant nuclear safety and reliability; and (v) activities related to procurement, storage and issuance of parts, materials, and services to assure implementation of QA Program and management requirements.



- b. Providing the Independent Safety Engineering Group (ISEG) functions as described in Appendix III, Section 1.0.

1.3.3.1.2 The Supervisor, Quality Programs reports to the Manager, Quality and is directly responsible for:

- In plant QC functions.
- Certifying Supply System nondestructive examination, QC, and test personnel.
- Maintaining Quality Program documents.

Qualification requirements for this position are described in Appendix I, Qualification Requirements.

1.3.3.1.3 The Lead, Supplier Quality reports to the Manager, Quality and is directly responsible for the source surveillance/audit program and for assuring that items received for WNP-2 meet the required quality standards, including:

- Establishing vendor witness points for inspection and release of material/equipment for shipment.
- QC receipt inspection of materials and equipment received by the Supply System.
- Establishing and maintaining evaluated vendors list.
- Planning, coordinating, and performing source surveillances, source inspections, and external audits to verify implementation of vendors' QA/QC programs.
- Reviewing and approving vendor furnished QA/QC procedures and programs.
- Reviewing for acceptance other utility audits furnished through the Nuclear Procurement Issues Committee (NUPIC).

Qualification requirements for this position are described in Appendix I, Qualification Requirements.

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1.3.3.2 The Manager, Regulatory Affairs reports to the Vice President, Operations Support/PIO and is responsible for:

- Acquiring and maintaining operating licenses of Supply System nuclear power plants.
- Defining and implementing programs which assure that licensing submittals receive an adequate technical review from cognizant Supply System, NSSS, or AE personnel prior to transmittal.
- Tracking licensing commitments and taking action necessary to assure that they are being met in a timely manner.
- Providing coordinated development of responses and comments to new laws, regulations, regulatory guides, and other regulatory issuances.
- Developing and maintaining an emergency response program that includes plans, implementing procedures, training, and drills and exercises.

1.3.3.3 The Engineering Manager reports to the Vice President, Operations Support/Public Information Officer and is responsible for providing project engineering and design control, nuclear fuel supply, and maintenance/operation engineering support as required for WNP-2. The Engineering Manager is specifically responsible for:

- Developing, maintaining, and implementing design control programs and processes by which plant design, and design changes, and modifications are defined, controlled, and verified.
- Developing and maintaining programs for in-service inspection, nondestructive evaluation, and materials and welding engineering.
- Providing engineering support for technical resolution of nuclear safety and licensing issues.
- Maintaining a current engineering data base for WNP-2.
- Implementing configuration control by establishing site-specific policy, procedures, and methods that allow control and accountability.
- Management of major plant modifications, major maintenance tasks, and contractor support.
- The supply, engineering, and efficient in-core management of nuclear fuel.



- Transient analysis and licensing issue resolution to support technical specification changes and reload fuel licensing.
- Reliability and availability analysis to improve plant performance, safety, and maintainability.
- Developing and maintaining fire protection programs.
- Training and qualification of engineering and technical support staff.

The Engineering Manager operates through the Manager, Design Engineering; Manager, Major Projects; and Manager, Reactor/Fuels Engineering. The Engineering organization and functional responsibilities of key personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2.

1.3.3.4 The Manager, Security Programs reports to the Vice President, Operations Support/ PIO and is responsible for overall Supply System security activities. The Manager, Security Programs is specifically responsible for:

- Administering a security program which includes preemployment screening, physical security surveys and investigations, loss prevention, and fitness for duty.
- Managing the security force by assuring that physical security is consistent with needs and is maintained within individual plant safeguards security plans.
- Providing training, administrative, and technical support to the Plant General Manager in the area of plant security.

1.3.4 The Vice President Administration/Chief Financial Officer reports to the Chief Executive Officer and is responsible for providing Administrative Services that are required to Support Operation and Maintenance of WNP-2 and establishing, managing, and administrating the implementation and effectiveness of the Nuclear Safety Issues Program (NSIP). To accomplish this role, the Vice President operates through the Manager, Administrative Services.

1.3.4.1 The Manager, Administrative Services reports to the Vice President, Administrative/Chief Financial Officer and is responsible for:

- Developing and implementation of administrative controls for plant procedures, processes and systems to maintain nuclear plant design, construction, and operating records.



- Providing program definition and policy development for Supply System records management activities, which includes processing, retrieval, storage and dispositioning of records.
- Providing administrative support functions necessary for the maintenance of manuals and procedures.
- Managing an administrative process by which engineering-related activities and commitments are assigned, scheduled, tracked, and dispositioned.

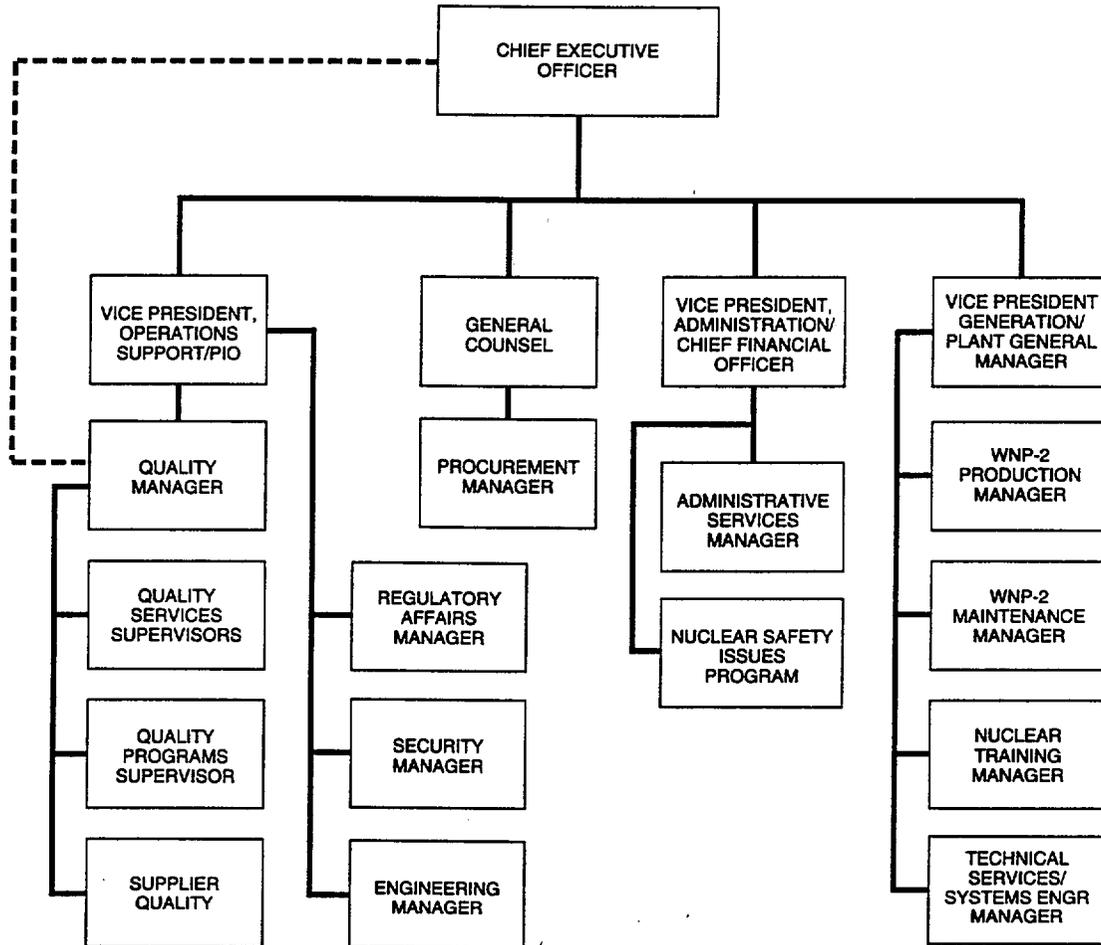
1.3.5 The General Counsel reports to the Chief Executive Officer and is responsible for providing procurement, inventory, spare parts engineering, and warehousing that are required to support operation and maintenance of WNP-2. To accomplish this role, the General Counsel operates through the Manager, Procurement.

1.3.5.1 The Manager, Procurement reports to the General Counsel and is responsible for contracting, procurement and storage control services that support operation and maintenance of Supply System nuclear power plants, the sale and demolition of Projects WNP-1, WNP-3, WNP-4 and WNP-5. These responsibilities include:

- Development of Supply System procurement policies and procedures.
- Procurement of items and services in response to approved purchase requisitions.
- Coding, cataloging, handling, storage, shipping, and disposal of procured items.
- Providing project management for disposition of assets from terminated power projects and disposition of major assets surplus to operating power projects.
- Maintaining the Restricted Use Equipment List (RUEL).
- Providing criteria for Class 1 and commercial grade dedicated spare parts procurement.

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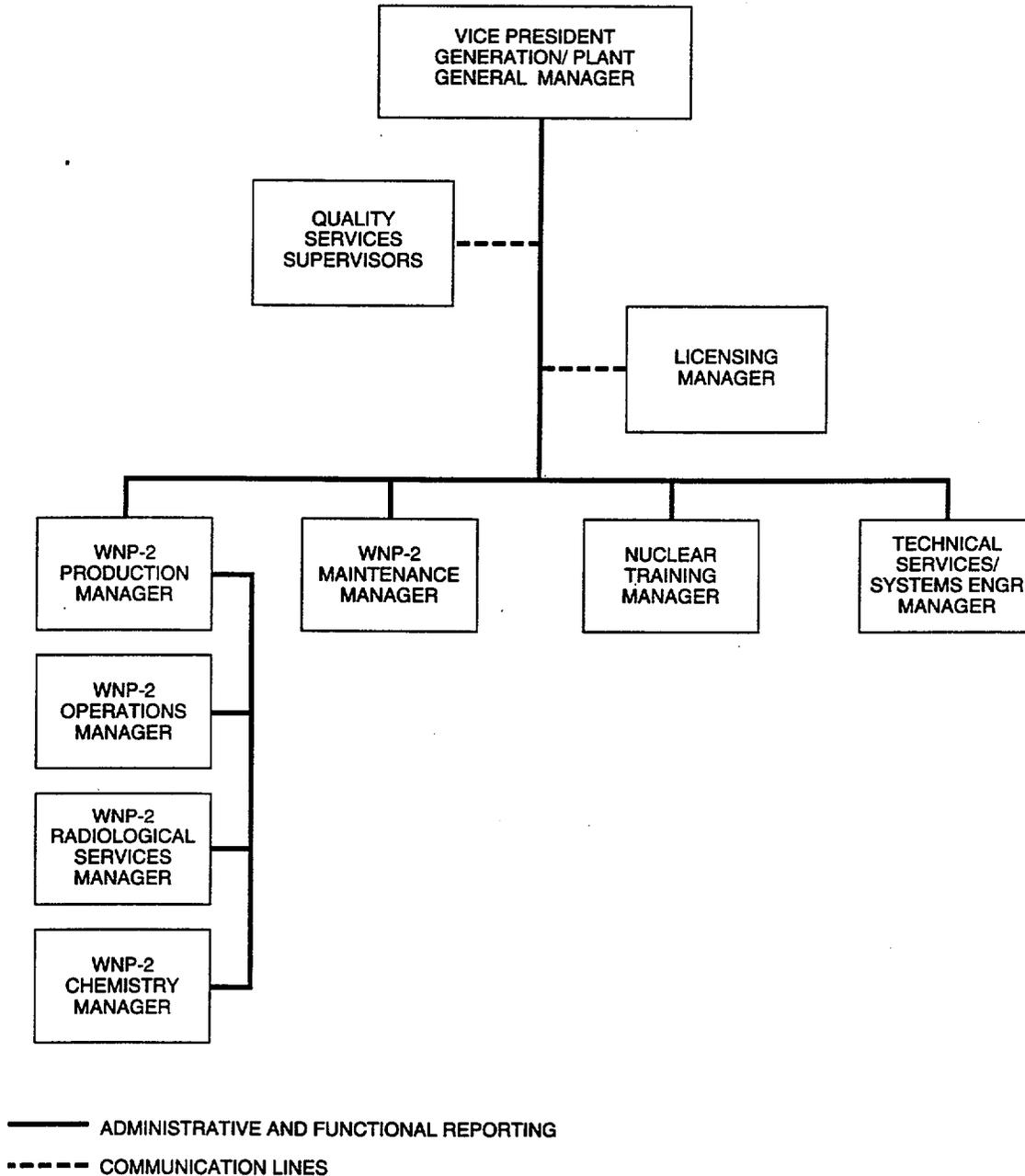
**FIGURE 1-1**



——— ADMINISTRATION AND FUNCTIONAL REPORTING  
 - - - - COMMUNICATION LINES

890853.1

FIGURE 1-2



**Supply System Organization  
Relative To Operational QA**

890853.2

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## 2-QUALITY ASSURANCE (QA) PROGRAM

### 2.1 PURPOSE

This section provides an overall description of the QA Program that will be applied to initial testing and subsequent operation and maintenance activities throughout the life of Supply System nuclear power plants.

### 2.2 GENERAL

- 2.2.1 The QA Program will be implemented through a series of Nuclear Operation Standards (NOSs) contained in the Supply System Functional Manual for Nuclear Operation. In turn, these NOSs will be implemented by Supply System organizational procedures, programs, or plans which prescribe detailed methods for functional accomplishment. The NOSs will address the applicable requirements of Appendix B to 10CFR50 is included in Table 2-1. The NOSs and implementing procedures, programs, or plans will collectively comply with the regulatory positions of QA-related Regulatory Guides as identified and modified in Appendix II, Position Statements and the additional Quality Program requirements as identified in Appendix III. The NOSs are being replaced by Site Wide Procedures (SWPs). These procedures contain the same information currently in the NOSs, and implement the QA Program. Table 2-2 lists the SWPs and are cross referenced to the criteria of 10CFR50, Appendix B.
- 2.2.2 A list of safety-related items that will be subject to the applicable controls of the QA Program is included in the Final Safety Analysis Report (FSAR) for the applicable Supply System nuclear power plant. Changes to this listing shall be controlled by the Engineering, Manager and approved by the Plant General Manager.
- 2.2.3 Applicable provisions of the QA Program shall be implemented by the earliest of the following and shall remain in effect for the life of Supply System nuclear power plants:
- a. Prior to inception of the activity.
  - b. At the time of temporary/permanent transfer of system/component custody to Test and Startup organization.
  - c. Ninety (90) days prior to initial fuel loading.

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2.2.4 Revision to the QA Program will be made by the Quality organization as follows:

- a. Proposed changes to the QA Program will be evaluated to determine whether or not they would result in a reduction of commitments previously accepted by the Nuclear Regulatory Commission (NRC).
- b. Changes that do not reduce the commitments may be implemented prior to forwarding such changes to the NRC. However, all such changes shall be forwarded to the NRC at least annually.
- c. Changes that reduce commitments will be forwarded to the NRC for their review and acceptance prior to implementation. Such changes shall be regarded as accepted by the NRC upon receipt of a letter from the NRC to this effect or sixty (60) days after submittal to the NRC, whichever occurs first.

2.2.5 Managers of Supply System organizations responsible for implementing the applicable provisions of the QA Program shall assure that activities that affect safety-related functions of plant items are performed by personnel who have been indoctrinated and trained. The scope, objective, and method of implementing the indoctrination and training program shall be documented. Proficiency of personnel performing activities that affect safety-related functions of plant items shall be maintained by retraining, re-examination, and/or recertifying, as applicable. Methods shall be provided for documenting training.

2.2.6 The scope, implementation, and effectiveness of the QA Program is routinely audited by the Quality organization. Copies of audit reports are presented to Supply System management to provide for assessment of the effectiveness of the QA Program. Additionally, at least once per two (2) years, the Supply System management arranges for an independent evaluation of the adequacy of the scope, implementation, and effectiveness of the QA Program. This is accomplished by knowledgeable personnel outside of the Quality organization to assure achievement of an objective program assessment. Results of these independent evaluations are reported to the Chief Executive Officer, Vice President, Generation/Plant General Manager, and Vice President, Operations Support/PIO.



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TABLE 2-1  
OPERATIONAL QA PROGRAM DESCRIPTION  
IMPLEMENTING NUCLEAR OPERATION STANDARDS  
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Nuclear Operation Standards		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
NOS-1	Organizational Responsibilities.Changes	X																	
NOS-2	Control of the Functional Manual for Nuclear Operation	X				X	X												
NOS-3	Operational QA Program Description Control	X					X												
NOS-4	Plant Operations and Maintenance Control	X		X			X		X	X			X	X	X				
NOS-5	Personnel Training, Qualification and Certification	X	X								X								
NOS-6	Review Committees (CNSRB & POC)	X																	
NOS-8	Nuclear Safety Assurance Assessment Program	X																	
NOS-9	Procedures/Instructions Control	X		X		X	X												
NOS-11	Conduct of Licensing Activities	X					X												
NOS-13	Reporting of Incidents	X		X															
NOS-14	Operating Experience Review	X																	
NOS-19	Plant QC Inspection Program	X									X	X							
NOS-20	Quality Assurance Evaluations	X														X	X		X
NOS-21	ASME Pressure Boundary Work	X		X			X	X	X	X	X	X		X	X				
NOS-22	Q-List Control	X		X															
NOS-23	Plant Modification Control	X		X		X					X								
NOS-24	Control of Records	X																	X
NOS-26	Computer Software QA	X		X		X													
NOS-27	Procurement and Storage Control	X			X		X	X						X					
NOS-30	Control of Nonconformances and Corrective Action	X		X			X								X	X	X		
NOS-32	Configuration Management Program	X		X			X												
NOS-33	Inservice Inspections	X					X			X	X	X							
NOS-34	Inservice Testing of Pumps and Valves	X					X				X								
NOS-35	Nuclear Materials Control	X													X				
NOS-36	Chemistry	X													X				
NOS-37	Rad. Environmental Mon. Program	X													X				
NOS-39	Fire Protection Program	X													X				
NOS-41	QA Program for Radioactive Materials Shipping Packages	X																	
NOS-45	Simulator Certification	X	X	X			X					X			X				



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TABLE 2-2  
OPERATIONAL QA PROGRAM DESCRIPTION  
IMPLEMENTING SITE WIDE PROCEDURES  
(Page 1 of 2)

Site Wide Procedures		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
SWP-PRO-01	Procedure/Instruction Use	X		X		X	X												
SWP-PRO-2	Prep./Review/Approval of Procedures	X		X		X	X												
SWP-PRO-03	Procedure Writer's Manual					X													
SWP-PUR-01	Procurement of Services	X			X		X	X						X					
SWP-PUR-03	Restricted Use Equipment List (RUEL)				X			X											
SWP-PUR-05	Emergency Purchasing				X			X											
SWP-PUR-02	Procurement Technical Reviews	X		X															
SWP-PUR-04	Material Equipment Parts, and Supplies Procurement	X		X	X	X			X				X	X					X
SWP-MMP-01	Control of Ageable Items													X					
SWP-MMP-02	Warehousing							X						X					
SWP-MMP-03	Packaging and Shipping of Material and Equipment							X						X					
SWP-ASU-01	Evaluations of Programs, Processes and Suppliers	X														X	X		X
SWP-FPP-01	Nuclear Fire Protection Program	X	X	X	X	X		X			X	X			X	X	X	X	X
SWP-IRP-01	Plant Operations Committee	X																	
SWP-IRP-02	Corporate Nuclear Safety Review Board	X																	X
SWP-DOC-01	Document Control					X	X												
SWP-EPP-01	Emergency Response Organization and Training	X	X																
SWP-MAI-01	Work Management Planning Scheduling and Work Activities	X				X	X				X	X				X	X		
SWP-OPS-03	Plant Clearance Orders	X													X				
SWP-REC-01	Records Management	X																	X
SWP-RMP-02	Radiation Waste Process Control Program	X	X														X	X	
SWP-TQS-01	Training, Qualification and Simulators	X	X								X								
SWP-CSW-01	Software QA Program	X		X			X												
SWP-CSW-02	WNP-2 Software Control	X		X			X												
SWP-INS-01	Quality Control Inspection and Peer Verification	X							X	X									



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#### 4-PROCUREMENT DOCUMENT CONTROL

#### 4.1 PURPOSE

This section sets forth requirements for preparation, review, and approval of procurement documents and changes thereto in order to control the quality of vendor furnished safety-related plant items and services.

#### 4.2 GENERAL

- 4.2.1 Procedures/instructions shall be established and implemented to control procurement-related activities such as procurement planning; preparation, review, approval and control of procurement documents; vendor selection; bid evaluations; and review and concurrence of vendor's quality assurance programs. These procedures/instructions shall clearly delineate the sequence of actions to be accomplished in the preparation, review, and approval of procurement-related documents and shall identify those positions or groups responsible for performing those actions.
- 4.2.2 Procurement documents for items (other than commercial grade off-the-shelf items, as defined in 10CFR21) and for services shall require, where necessary, vendors or subvendors to have a quality assurance program consistent with the applicable provisions of the QA Program.
- 4.2.3 As deemed necessary, the procurement documents will provide for right of access to the vendor's facilities and records for source inspections/audit by Supply System or its designee.
- 4.2.4 Procurement documents shall contain or reference applicable technical requirements (such as regulations, specifications, drawings, codes, and standards), test and inspection requirements, and special process instructions that must be complied with by vendors.
- 4.2.5 Procurement documents shall contain, as applicable, requirements which identify the documentation (such as drawings, specification, inspection and test records, personnel and procedure qualifications, Certificates of Conformance or equivalent certifications, and material chemical and physical test results) to be prepared, maintained, submitted, or made available to Supply System for review and/or approval.



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- 4.2.6 Procurement documents shall be reviewed by independent Procurement personnel. This review will be performed and documented to assure that quality requirements are correctly stated; that they can be inspected and controlled; the vendor is on the current Supply System Evaluated Supplier List; and the procurement documents have been prepared to incorporate appropriate provisions of 4.2.2 through 4.2.5. Quality personnel shall review procurement documents on a sampling basis, either during visits to vendors facilities, or during audits/surveillances, or at receiving inspection.
- 4.2.7 Changes (other than those that are of administrative nature) to approved procurement documents shall be subjected to the same degree of control that was applied during the preparation of original procurement documents.

**OPERATIONAL  
QUALITY ASSURANCE PROGRAM DESCRIPTION****12.- CONTROL OF MEASURING AND TEST EQUIPMENT****12.1. PURPOSE**

This section sets forth the requirements to establish those measures which will assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are controlled, calibrated, and adjusted at specified periods in order to maintain accuracy within necessary limits.

**12.2. GENERAL**

12.2.1. Measuring and test equipment (M&TE) shall be calibrated and adjusted using approved procedures/instructions.

12.2.2. A calibration program for the control and use of M&TE shall be established, and implemented. This program, as a minimum, shall provide for:

- a. Unique identification of the item and its traceability to the calibration test data.
- b. Labeling or tagging (or otherwise controlling) to indicate the due date of the next calibration.
- c. Calibration technique and frequency.
- d. Generation and maintenance of records which indicate the complete listing of all items under the calibration system together with their current calibration status.
- e. Controlled environment conditions for sensitive and close tolerance M&TE.

12.3. M&TE shall be calibrated against certified calibrating standards having known valid relationships to nationally recognized standards. If no national standards exist, the basis for calibration will be documented.

12.4. Standards adequacy will be determined by computing the ratio of test instrument tolerance to standard tolerance (Test Uncertainty Ratio, or TUR). A TUR of 4:1 or greater is considered acceptable. TURs of less 4:1 will be handled on a case by case basis, either by widening the test instrument tolerance (with the concurrence of the customer), or by mathematically reducing the test instrument tolerance to provide the same level of confidence as a 4:1 ratio. Other methodologies may be employed with the concurrence of the customer, including a statement of uncertainty or documentation of the actual ratio, if less than 4:1. The method used will be documented.

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- 12.5. M&TE shall be calibrated and maintained at specified periods based on the required accuracy, purpose, stability characteristics, and other conditions affecting the measurement.
- 12.6. When an item of M&TE is found to be out of calibration, an evaluation shall be made and documented to determine the validity of previous inspection/test results and the disposition to be made of items previously inspected/tested.

**OPERATIONAL  
QUALITY ASSURANCE PROGRAM DESCRIPTION****17 - QUALITY ASSURANCE RECORDS****17.1 PURPOSE**

This section sets forth requirements for generation, transmittal, retention, and maintenance of quality assurance records for Supply System's nuclear power plants.

**17.2 GENERAL**

17.2.1 Sufficient records shall be maintained to furnish evidence of the quality of safety-related plant items and activities. As a minimum these records shall include the following:

- a. Operating logs
- b. Results of design reviews, inspections, tests, audits, and material analysis
- c. Monitoring of work performance
- d. Qualifications of personnel, procedures, and equipment.
- e. Drawings, specifications, procedures, and procurement documents.
- f. Nonconformance and corrective action reports
- g. Records as required by Appendix III, Section 4.0 and 5.0.

17.2.2 Inspection and test records shall identify the following where applicable:

- a. Inspector and/or data recorder
- b. The type of observation
- c. The date and results of inspection or test.
- d. Acceptability of results.
- e. The action taken to resolve any deficiencies noted.

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- 17.2.3 Quality assurance records shall be generated (prepared, reviewed, and approved), accumulated, transmitted for incorporation into the records retention system, retained, maintained, and controlled in accordance with documented procedures and/or instructions.
- 17.2.4 The quality assurance records shall be organized and filed so that each document is identifiable and retrievable.
- 17.2.5 The quality assurance records shall be filed and maintained in facilities that provide protection from possible deterioration or damage and shall be controlled to prevent loss.



**OPERATIONAL  
QUALITY ASSURANCE PROGRAM DESCRIPTION**

APPENDIX I

QUALIFICATION REQUIREMENTS

The minimum qualification requirements for key Quality Assurance personnel that will be met at the time of initial core loading or appointment to the active positions are specified below.

I.1. The Manager, Quality or both Supervisors, Quality Services fulfill the position described in ANSI/ANS-3.1-1978, Section 4.4.5, Quality Assurance. The qualifications for this position are:

- a. Education: Bachelors Degree or equivalent\* in Engineering or related science.
- b. Six (6) years experience in the field of quality assurance, or equivalent number of years of nuclear industry experience in a supervisory/management position or a combination of the two. At least two (2) years of these six years experience shall be nuclear power plant experience in the overall implementation of the quality assurance program. (This experience shall be obtained within the quality assurance organization.)

I.2. Quality Programs Supervisor or Lead, Supplier Quality

- a. Education: Bachelor Degree or equivalent\* in Engineering or a related science.
- b. Experience: Four (4) years of nuclear plant experience at an operating nuclear plant. At least one (1) of these four (4) years of experience shall be in the implementation of the quality assurance program through participation in the QA or QC function, or involvement in programs subject to QA/QC audits or inspections.

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\*Equivalency will be determined based upon an evaluation of the following factors:

1. High school diploma or GED.
2. Sixty (60) semester hours of related technical education taught at the college level (900 classroom or instructor conducted hours).
3. Qualified as an NRC senior operator at the assigned plant.
4. Four (4) years of additional experience in his area of responsibility.
5. Four (4) years of supervisory or management experience.
6. Demonstrated ability to communicate clearly (verbally and in writing).
7. Certification of academic ability and knowledge by corporate management.
8. Successful completion of the Engineer-In-Training examination.
9. Professional Engineer License.
10. Associated degree in Engineering or a related science.



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APPENDIX III

"ADDITIONAL QUALITY PROGRAM REQUIREMENTS"

This Appendix identifies additional quality program requirements that were formally located in the WNP-2 Technical Specification, Section 6.0, Administrative Controls or in the FSAR. The following requirements have been incorporated by Supply System organizations into their procedures and/or instructions. This Appendix will be revised, when necessary, in accordance with the provisions of Section 2 of the QA Program.

1.0 NUCLEAR SAFETY ASSURANCE DIVISION (NSAD)

1.1 The NSAD shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The NSAD shall make detailed recommendations for revised procedures, equipment and modifications, maintenance activities, operations activities, or other means of improving unit safety to the Quality Manager.

1.1.1 The NSAD shall be composed of at least five, dedicated, full-time engineers, with a minimum of three located on site. Each shall have a bachelor's degree in engineering or related science or qualifications meeting ANS.3.1. Draft Revision dated March 13, 1981, Section 4.2 or 4.4, or equivalent, as described in Section 4.1 and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.

1.1.2 The NSAD shall be responsible for maintaining surveillance of unit activities to provide independent verification (not responsible for sign-off function) that these activities are performed correctly and that human errors are reduced as much as practical.

1.1.3 Records of activities performed by the NSAD shall be prepared, maintained, and forwarded each calendar month to the Quality Manager.

2.0 REVIEW AND AUDIT

2.1 PLANT OPERATIONS COMMITTEE (POC)

The POC shall function to advise the Plant General Manager on all matters related to nuclear safety.



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2.1.1 The POC shall be composed of individuals experienced in one of the following functional areas:

- |             |                         |
|-------------|-------------------------|
| Operations  | Administrative Services |
| Maintenance | Radiation Protection    |
| Engineering | Technical Services      |
| Quality     | Chemistry               |

2.1.2 The Plant General Manager, the POC Chairman, shall appoint, in writing, the POC Vice Chairman, and individual members. The qualifications of all members shall meet the requirements of ANSI/ANS-3.1-1981, Section 4.7, and have, cumulatively, expertise in the areas listed in 2.1.1, as a minimum.

2.1.3 All POC alternate members shall be appointed in writing by the POC Chairman or Vice Chairman to serve on a temporary basis.

2.1.4 The Plant Operations Committee shall meet at least once per calendar month and as convened by the POC Chairman or his designated alternate.

2.1.5 The quorum of the POC necessary for the performance of the POC responsibility and authority provisions of these requirements shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two alternates shall make up the quorum.

2.1.6 The POC shall be responsible for:

- a. Review of 10CFR50.59 Safety Evaluations associated with procedures and programs required by Technical Specification 5.4 and changes thereto.
- b. Review of all proposed tests and experiments that affect nuclear safety, as determined by the need for a 10 CFR 50.59 Safety Evaluation;
- c. Review of all proposed changes to the Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit system or equipment that affect nuclear safety, as determined by the need for a 10 CFR 50.59 Safety Evaluation;
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board;



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- f. Review of all REPORTABLE EVENTS, as specified in 10 CFR 50.73;
- g. Review of unit operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Corporate Nuclear Safety Review Board;
- i. Review of the Security Plan and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- j. Review of the Emergency Plan and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board; and
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

2.1.7 The POC shall:

- a. Recommend in writing to the Plant General Manager approval or disapproval of items considered under Appendix III, 2.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Appendix III, 2.1.6a. through e. constitutes an unreviewed safety question as defined in 10 CFR 50.59.
- c. Provide written notification within 24 hours to the Chief Nuclear Officer and the Corporate Nuclear Safety Review Board of disagreement between the POC and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Technical Specification 5.1.1.



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2.1.8 The POC shall maintain written minutes of each POC meeting that, at a minimum, document the results of all POC activities performed under the responsibility provisions of these Specifications. Copies shall be provided to the Chief Nuclear Officer and the Corporate Nuclear Safety Review Board.

**2.2 CORPORATE NUCLEAR SAFETY REVIEW BOARD (CNSRB)**

2.2.1 The CNSRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality Assurance practices.

The CNSRB shall report to and advise the Chief Nuclear Officer on those areas of responsibility in Appendix III, 2.2.7 and 2.2.8.

2.2.2 The CNSRB shall be composed of at least nine and no more than twelve members, appointed in writing by the Chief Nuclear Officer from his senior technical staff and/or from outside the Supply System. He shall designate from the members a Chairman and an Alternate Chairman. The qualifications of all members shall meet the minimum requirements of Section 4.7 of ANSI/ ANS 3.1-1981 and have, cumulatively, expertise in the areas listed in Appendix III, 2.2.1, as a minimum.

2.2.3 All alternate members shall be appointed in writing by the CNSRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNSRB activities at any one time.

2.2.4 Consultants shall be utilized as determined by the CNSRB Committee to provide expert advice to the CNSRB.



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- 2.2.5 The CNSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.
- 2.2.6 The quorum of the CNSRB necessary for the performance of the CNSRB review and audit functions of these specifications shall consist of the Chairman or the alternate Chairman and at least four CNSRB members including alternates. The quorum shall consist of not less than the majority of the members, or duly appointed alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.
- 2.2.7 The CNSRB shall review:
  - a. The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
  - b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
  - c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
  - d. Proposed changes to Technical Specifications or the Operating License;
  - e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instruction having nuclear safety significance;
  - f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
  - g. All REPORTABLE EVENTS, as specified in 10 CFR 50.73;
  - h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
  - i. Reports and meeting minutes of the POC.
  - j. Audit reports and summary reports of audits.



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- 2.2.8 Audits of unit activities shall be performed under the cognizance of the CNSRB. These audits shall encompass:
- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
  - b. The performance, training and qualifications of the entire unit staff at least once per 12 months;
  - c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
  - d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
  - e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licenses QA personnel;
  - f. The Emergency Plan and implementing procedures at least once per 12 months per 10 CFR 50.54(t).
  - g. The Security Plan and implementing procedures at least once per 12 months.
  - h. The fire protection equipment and program implementation, at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least once every third year; and
  - i. Any other area of unit operation considered appropriate by the CNSRB or the Chief Nuclear Officer.
  - j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
  - k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.



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- 1. The **PROCESS CONTROL PROGRAM** and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
  - m. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.
- 2.2.9 Records of CNSRB activities shall be prepared, approved, and distributed as indicated below:
- a. Items identified at each CNSRB meeting that require actions shall be identified and tracked. These actions shall be resolved in a time frame commensurate with their importance to safety.
  - b. Minutes of each CNSRB meeting shall be prepared, approved, and forwarded to the Chief Nuclear Officer within 15 working days following each meeting.
  - c. Reports of reviews encompassed by Appendix III, 2.2.7 above, shall be prepared, approved, and forwarded to the Chief Executive Officer within 15 working days following completion of the review.
  - d. Audit reports encompassed by Appendix III, 2.2.8 shall be forwarded to the Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit.

**3.0 PROCEDURES AND PROGRAMS**

- 3.1 Each procedure of Technical Specification 5.4.1, and changes thereto, shall be reviewed and approved as specified by Appendix III, 4.0, prior to implementation and reviewed periodically as set forth in administrative procedures.
- 3.2 Temporary changes to procedures of Technical Specification 5.4.1a. through e. may be made provided:
  - a. The intent of the original procedure is not altered;
  - b. The change is approved by two members of the unit management staff, at least one of these individuals shall be the supervisor in charge of the shift and holds a Senior Operator license on the unit affected; and



- c. The change is documented and reviewed by the appropriate member(s) of Plant management, within 14 days of implementation.

#### 4.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

- 4.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 4.2 Each program and procedure required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two technical reviewers; i.e., the procedure sponsor and a Qualified Procedure Reviewer who are knowledgeable in the affected functional area. The Qualified Procedure Reviewer shall not be the individual who prepared the procedure or procedure change. The Qualified Procedure Reviewer, or procedure sponsor shall determine the need for cross disciplinary reviews. All required cross-disciplinary reviews of new procedures, procedure revisions or changes thereto shall be completed prior to approval.
- 4.3 Qualified Procedure Reviewer(s) shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions, with the exclusion of the positions identified in Section 4.3.1 and 4.5. Individuals whose positions are described in Section 4.3.1 and 4.5 may qualify as qualified procedure reviewers provided they meet the qualification described in other portions of Section 4.
- 4.4 Each program and procedure required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed to determine if a 10 CFR 50.59 Safety Evaluation is required. This review shall be accomplished by two individuals, who are knowledgeable in the affected functional area. These individuals shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for the applicable positions. Safety evaluations, when required, shall be reviewed by POC per OQAPD, Appendix III, 2.1.6.a.
- 4.5 Nuclear safety related procedures and procedure changes shall be reviewed and approved, prior to implementation, by the appropriate member(s) of management, as determined by the Plant General Manager and as specified in Administrative Control Procedures.
- 4.6 All changes to the Process Control Program (PCP) and the Offsite Dose Calculation Manual (ODCM) shall be reviewed by POC and approved by the Plant General Manager prior to implementation.

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A Records Disposition Program was established to manage the identification, retention, retirement and disposal of Supply System records and documents. Refer to the Records Disposition Program to insure compliance with various Federal and Washington State record retention requirements.

5.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

5.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities, inspections, and calibrations required by the Plant Technical Specifications.
- e. Records of changes made to the procedures required by Technical Specification 5.4.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

5.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report (FSAR).
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.



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- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Technical Specification 5.5.5.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to the Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Appendix III, 5.2.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the POC and the CNSRB.
- l. Records of the service lives of all hydraulic and mechanical snubbers required by WNP-2 Snubber Program including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analysis required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.



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**6.0 OPERATING EXPERIENCE**

**(TMI ITEM I.C.5)**

- 6.1 An Operating Experience (OE) Program is established and the program procedure describes how industry-operating experience is identified, reviewed, evaluated, and documented. The industry operating experience information includes, but is not limited to; NRC Bulletins and Notices, INPO Significant Operating Experience Reports, Significant Event Reports, Significant Event Notifications and vendor information, such as GE Service Information Letters.**
- 6.2 The Operating Experience program administrator will perform the initial document review. The information that is applicable to WNP-2 will be identified, evaluated and documented in accordance with the approved procedure. The operating experience information will be evaluated by the applicable knowledgeable organization. To prevent conflicting or contradictory information being conveyed to plant personnel, industry information processed via the Operating Experience Program is evaluated prior to use in the training program.**
- 6.3 Internal Operating Experience information identified via the Corrective Action Program will be evaluated for transmittal to the industry.**
- 6.4 Independent periodic evaluations of the Operating Experience review process will be performed by the Quality Organization.**