OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (EN-QA-004)

APPROVED: _____ 2/9/2000

Manager, Quality *Date Effective*

REVISION NO. 33

ORIGINAL ISSUE: May 10, 1978

ENERGY NORTHWEST

MANAGEMENT STATEMENT

It is the policy of Energy Northwest to design, construct and operate its nuclear power plant without undue risk to the health and safety of the public and to the environment. In support of this policy, Energy Northwest has established a Quality Assurance Program that is described in the Operational Quality Assurance Program Description.

This document contains the official Energy Northwest Quality Assurance policies. All Energy Northwest employees shall adhere to these policies.

The Operational Quality Assurance Program Description meets the applicable requirements of 10 CFR 50, Appendix B.

The Quality Department is mandated the responsibility and authority for establishing, administering, and assuring implementation of the Energy Northwest Quality Assurance Program. The Manager, Quality has the responsibility and authority, including stop work authority, to perform actions necessary to accomplish this mandate as delineated in the Quality Assurance Program manuals and documents.

The Quality Department has my delegated approval authority for the Operational Quality Assurance Program Description and any necessary modifications.

J. V. Parrish, Chief Executive Officer/Date

LIST OF EFFECTIVE PAGES

PAGE	REVISION
i	33
ii	13
iii	33
iv	33
1-1 - 1-4	32
2-1 - 2-6	23
3-1 - 3-3	7
4-1 & 4-2	7
5-1	5
6-1 & 6-2	8
7-1 - 7-3	9
8-1	5
9-1	11
10-1 & 10-2	9
11-1	5
12-1 & 12-2	8
13-1	10
14-1	5
15-1	10
16-1	5
17-1 & 17-2	6
18-1	15
I-1	18
II-1 - II-15	16
III – 1 – III-11	5

TABLE OF CONTENTS

2.0 SECTION 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 the Energy Northwest nuclear power plant.

2.2 GENERAL

2.2.1 The QA Program will be implemented through a series of Site Wide Procedures (SWP), plant procedures contained in the Plant Procedure Manual, and Nuclear Operating Standards (NOS) contained in the Functional Manual for Nuclear Operation. The procedures and standards prescribe detailed methods for functional accomplishment. The procedures and standards will address the applicable requirements of Appendix B to 10 CFR 50 included in Tables 2-1 and 2-2. The procedures and standards will 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.

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 Energy Northwest 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 the Energy Northwest nuclear power plant:

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.

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 its 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 Energy Northwest 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-examining, 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 Energy Northwest management to provide for assessment of the effectiveness of the QA Program. Additionally, at least once per two (2) years, Energy Northwest 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, the executive responsible for Nuclear Safety and Plant Operations, and the executive responsible for Operations Support.

2.2.7 Regulatory Commitments

Except where alternatives are identified, Energy Northwest complies with the QA guidance documents listed on Appendix II. If the guidance in one of these documents is in conflict with the OQAPD, the guidance provided in the OQAPD is the controlling guidance. Additionally, the following clarifications apply to all guidance documents listed in Appendix II:

a. For modifications and non-routine maintenance, guidance applicable to construction-like activities is applicable to comparable plant activities. The inspection of modifications, repairs, rework, and replacements shall be in accordance with the original design and inspection requirements or a documented approved alternative.

b. The definitions provided by Regulatory Guide 1.74 and associated clarifications, as described in Appendix II, apply wherever the defined term is used in the OQAPD and associated guidance documents.

c. Clarification to a guidance document applies wherever the guidance document is invoked.

d. In each of the ANSI standards, other documents (e.g., standards, codes, regulations, tables, or appendices) are referenced or described. These other documents are only quality assurance program requirements if explicitly committed to in the OQAPD. If not explicitly committed to, these documents are not considered as quality assurance program requirements, although they may be used as guidance.

e. Guidance applicable to safety-related items and activities is applicable to comparable items and activities controlled by 10 CFR 72 and transportation packages controlled by 10 CFR 71.

f. Scheduling latitude of 25 percent, or 90 days, whichever is shorter may be applied to performance of periodic activities (annual supplier evaluations, triennial vendor audits, recertification in accordance with ANSI N45.2.23-1978 (QA Program Audit Personnel), Annual Evaluations in accordance with ANSI N45.2.6-1978 (Qualifications of Inspection, Examination, & Testing Personnel), and internal audits in accordance with ANSI N18.7-1976. The next performance due date for such activities will be based on their originally scheduled date. The periodicity for these activities will not exceed the original commitment plus 90 days.

TABLE 2-1

OPERATIONAL QA PROGRAM DESCRIPTION
IMPLEMENTING NUCLEAR OPERATION STANDARDS
(Page 1 of 1)

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
(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									

TABLE 2-2
OPERATIONAL QA PROGRAM DESCRIPTION
IMPLEMENTING SITE WIDE PROCEDURES
(Page 2 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-CAP-01	Problem Evaluation Request	X		X			X								X	X	X		
SWP-ISI-01	ASME Section XI Inservice Inspection	X					X			X	X	X							
SWP-TST-01	Post Maintenance/Modification Testing Program											X			X			X	
SWP-ORG-01	Organizational Responsibilities and Changes	X																	
SWP-CAP-03	Operating Experience Review	X															X		
SWP-SNM-01	Special Nuclear Material Control	X				X		X							X			X	

APPENDIX II

"POSITION STATEMENTS"

This Appendix identifies those quality-related Regulatory Guides which Energy Northwest intends to follow during operation phase of its nuclear power plant. However, where the Regulatory Positions stated in these Regulatory Guides could lead to misunderstanding, or where alternate methods and/or solutions are implemented for accomplishment of Regulatory Positions, they are also described in this Appendix. The commitments to comply with applicable Regulatory Guides not addressed in this Appendix are or will be documented in the applicable Final Safety Analysis Report. The Positions, described in this Appendix, will be incorporated into procedures and/or instructions for applicable activities. This Appendix will be revised, as and when necessary, by Energy Northwest's Quality Department, in accordance with the provisions of Section 2 of the QA Program.

II.1 REGULATORY GUIDE 1.8, REV. 1-R (May 1977) - "Personnel Selection and Training"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.8, Rev. 1-R (May 1977). For details, see Chapter 13 of the Final Safety Analysis Report for WNP-2.

II.2 REGULATORY GUIDE 1.26, REV. 3 (February 1976) - "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive- Waste-Containing Components of Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.26, Rev. 3 (February 1976).

II.3 REGULATORY GUIDE 1.29, REV. 3 (September 1978) - "Seismic Design Classification"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.29, Rev. 3 (September 1978).

II.4 REGULATORY GUIDE 1.30, (Safety Guide 30, August 11, 1972) - "Quality Assurance Requirements for the Installation, Inspection and Testing of Instrumentation and Electric Equipment"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972), subject to the following:

1. Regulatory Position C.1 of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972) states that ANSI N45.2.4-1972 should be used in conjunction with ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants." It is Energy Northwest's position that ANSI N45.2-1971 is not applicable for operational phase activities of nuclear power plants. Instead Energy Northwest will comply with its Position Statement on Regulatory Guide 1.33.

2. Section 1.1 of ANSI N45.2.4-1972: This standard will be applied to the installation, inspection, and testing of Class 1E instrumentation, electrical systems and/or components for plant modifications comparable in nature and extent to the activities normally occurring during the initial plant design and construction phase.

3. Section 3(3) of ANSI N45.2.4-1972: Checking of records is normally accomplished during periodic surveillances and audits of the storage facility. The checking of storage records for each individual item prior to installation is not planned.

4. Section 5.1.2 of ANSI N45.2.4-1972: Inspections to verify housekeeping will be done as stated in Energy Northwest position statement on Regulatory Guide 1.39.

5. Section 5.2.1 of ANSI N45.2.4-1972: Tests will include those listed as appropriate. The manufacturers' recommendations shall be considered. The test procedure will specify the actual test to be performed.

6. Section 9 of ANSI N45.2.4-1972: Energy Northwest's position, stated herein, does not address the codes and standards listed and/or referenced in this paragraph. Such position will be developed in the future, if the need arises.

7. Appendix A "Supplementary Provisions for Multi-Unit Stations" to ANSI N45.2.4-1972 is not considered applicable to Energy Northwest nuclear power plant

8. Appendix B "Additional Codes, Standards and Guides" to ANSI N45.2.4-1972: Refer to Energy Northwest Position on Section 9 of ANSI N45.2.4-1972.

II.5 REGULATORY GUIDE 1.33, REV. 2 (February 1978) - "Quality Assurance Program Requirements (Operation)"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.33, Rev. 2 (February 1978), subject to the following:

1. Regulatory Position C.2 of Regulatory Guide 1.33, Rev. 2 (February 1978) implies that the provisions contained in the latest revisions of the Regulatory Guides, listed therein, will be followed. Energy Northwest will follow its position statements on applicable Regulatory Guides as described throughout this Appendix.

2. Regulatory Position C.4 of Regulatory Guide 1.33, Rev. 2 (February 1978). This section establishes minimum two-year audit frequency for all safety-related functions and recommends audit frequencies specific to Corrective Action, Facility Operation, and Staff Performance, Training, and Qualifications. Energy Northwest will perform audits at frequencies as discussed in Section 2.2.8 Appendix III instead of this section.

   Internal Audits - Section C.3.a (1) of RG 1.144 refers to RG 1.33 for requirements. A grace period of 90 days will be applied to the 24-month frequency for internal audits described in Section 4.5 of ANSI N18.7-1976, which states that audits of safety related activities are completed "within a period of two years." This grace period will not be applied to audits of the Emergency Plan to satisfy the requirements of 10 CFR 50.54(t), and Security Plan to satisfy the requirements of 10 CFR 50.54(p)(3), 73.56(g)(1) and (g)(2) and 10CFR 73.55(g)(4).

3. Section 5.2.13.4 of ANSI N18.7-1976/ANS-3.2: The third paragraph of this section is revised to read, "Special handling tools and equipment shall be inspected and/or tested, as necessary, in accordance with written procedures and at specific times to verify that the tools and equipment are adequately maintained."

4. Section 5.2.15 of ANSI N18.7-1976/ANS-3.2: The fourth paragraph of this section is modified with the following (the remaining text of this section is unchanged):

   This section requires plant procedure review by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable. Instead of this review, controls are in effect to ensure that procedures are reviewed for possible revision upon identification of new or revised source material potentially affecting the intent of procedures.

5. Section 5.2.17 of ANSI N18.7-1976/ANS-3.2 states that inspection of operating activities may be conducted by second-line supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work. Energy Northwest's position is to allow the plant operations' first-line supervisors to perform inspections of surveillance tests, provided that an after-the-fact review of surveillance documentation is performed by the second-line supervisor or by other personnel not assigned first-line responsibility for the conduct of the work.

6. Sections 5.2.19.1 and 5.2.19.2 of ANSI N18.7-1976/ANS-3.2 describe rules of practice for preoperational and startup test program. Energy Northwest intends to comply with the provisions of these sections. In cases, where conflicts exist between these sections and Regulatory Guide 1.68, Energy Northwest will comply with the implementation of Regulatory Guide 1.68 as described in Chapter 14 "Initial Test Program" of the Final Safety Analysis Report.

II.6 REGULATORY GUIDE 1.37, (March 16, 1973) - "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.37, (March 16, 1973), subject to the following:

1. Regulatory Position C.4 of Regulatory Guide 1.37 (March 16, 1973) states, in part, "Chemical compounds that could contribute to intergranular cracking or stress-corrosion cracking should not be used with austenitic stainless steel and nickel-base alloys." In clarification, Energy Northwest will either follow the chemical composition limits established by its Nuclear Steam Supply System vendor or establish such limits based upon a documented engineering evaluation.

2. Regulatory Position C.5 of Regulatory Guide 1.37 (March 16, 1973) states, in part, "Specifically, tools which contain materials that could contribute to intergranular cracking or which, because of previous usage, may have become contaminated with such materials should not be used on surfaces of corrosion-resistant alloys." In clarification, Energy Northwest will either follow the chemical composition limits established by its Nuclear Steam Supply System (NSSS) vendor, or establish such limits based upon a documented engineering evaluation.

3. Section 2.1 of ANSI N45.2.1-1973 states, in part, "Planning for cleaning activities shall include a review of the system and component design specifications and drawings. In clarification of this requirement, a review of system and component design specifications and drawings will be required for only those modifications which change the design of a fluid system.

4. Section 2.3 of ANSI N45.2.1-1973, last sentence, is revised to read, "Test reports shall include an evaluation of the acceptability of inspection and test results and provide for identifying the individual who performed the evaluation."

5. Section 3.1.2.1 of ANSI N45.2.1-1973 states, in part, "Scattered areas of rust are permissible provided the aggregate area of rust does not exceed two square inches in any one square foot area." Energy Northwest considers this two square inch limit as a guide only. Adequate discretion by experienced personnel will be used in all cases.

6. Section 3.1.2.5 of ANSI N45.2.1-1973 states, in part, "There shall be no evidence of organic contamination in the effluent water or on the filter." The presence of organic contamination will be determined visually or by feel.

7. Section 4 of ANSI N45.2.1-1973, second sentence, is revised to read, "Inspections, examinations, or tests for cleanliness shall be performed if it is suspected that cleanliness has been affected by transportation to, or storage at the installation site."

8. Section 7.4 of ANSI N45.2.1-1973 requires checking of cleaning solutions for effectiveness of inhibitors (if used). In clarification of this requirement, the effectiveness of inhibitors (if used) will be determined by documentation in technical literature or manufacturer's or vendor's recommendations.

II.7 REGULATORY GUIDE 1.38, REV. 2 (May 1977) - "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.38, Rev. 2 (May 1977), subject to the following:

1. Section 3.2.1 (1) of ANSI N45.2.2-1972: Temperature and humidity control considerations for packaging of Level A items are not considered applicable to nuclear fuel assemblies unless recommended otherwise by the nuclear fuel manufacturer. Energy Northwest will abide by the manufacturer's recommendation.

2. Section 3.5.2 of ANSI N45.2.2-1972, last sentence, is revised to read as, "Tapes used for identification rather than sealing which are not near a welding operation may remain indefinitely (see also Appendix Section 3.5.2 for additional requirements)."

3. Section 3.7.1 (1) of ANSI N45.2.2-1972: Energy Northwest may use cleated, sheathed boxes for loads up to 1,000 pounds rather than 500 pounds limit imposed here. This type of box has been tested by the WNP-2 Nuclear Steam Supply System vendor and found safe for loads up to 1,000 pounds. Other national standards allow the 1,000 pound designation (see Federal Specification PPP-B-601).

4. Section 6.1.2 (1) of ANSI N45.2.2-1972: Temperature and humidity controls required for storage of Level A items are not considered applicable for nuclear fuel assemblies unless recommended otherwise by the nuclear fuel manufacturer. Energy Northwest will abide by the manufacturer's recommendation.

5. Section 6.4.2 of ANSI N45.2.2 gives detailed requirements for care of items in storage. In clarification, Energy Northwest will either follow manufacturer's recommendation or follow its own requirements, established based upon a documented engineering evaluation, concerning maintenance of protective covers, seals, and caps; maintenance of preservatives and inert atmosphere; energization of instrument racks and space heaters; insulation resistance testing; and rotation of shafts for rotating equipment.

6. Appendix Sections A3.4.1 (4) and A3.4.1 (5) of ANSI N45.2.2-1972: During printing of the standard, a transposition occurred between the last sentences of these sections. Energy Northwest will comply with the correct wording which reads as follows:

   A3.4.1 (4), last sentence: However, preservatives for inaccessible inside surfaces of pumps, valves and pipe for systems containing reactor coolant water shall be the water flushable type.

   A3.4.1 (5): The name of the preservative used shall be indicated to facilitate touch up.

II.8 REGULATORY GUIDE 1.39, REV. 2 (September 1977) - "Housekeeping Requirements for Water-Cooled Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.39, Rev. 2 (September 1977), subject to the following:

Section 2.1 of ANSI N45.2.3-1973 requires the establishment of cleanness requirements for housekeeping activities on the basis of zone designations. Energy Northwest considers these zone designations and the requirements associated with each zone as impractical for implementation during the operations phase. Procedures or instructions for housekeeping activities, which include the applicable requirements outlined in Section 2.1 of ANSI N45.2.3-1973 and which take into account the radiation control considerations, security considerations and cleanness requirements, will be developed on case by case basis for maintenance and modification work to be performed.

II.9 REGULATORY GUIDE 1.58, REV. 1 (September 1980) - "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.58, Rev, 1 (September 1980), subject to the following:

1. Regulatory Position C.5 of Regulatory Guide 1.58, Rev. 1 (September 1980) implies that individuals who review and approve inspection, examination, and testing procedures and those who evaluate the adequacy of such procedures to accomplish the inspection, examination, and test objectives, should meet the Level III capability requirements delineated in Table I of ANSI/ASME N45.2.6-1978. Not all Energy Northwest personnel performing the types of cited functions will meet the Level III capability requirements of Table 1 of ANSI/ASME N45.2.6-1978. However, personnel performing the cited functions will be determined by Energy Northwest management (through evaluation of their education, training, and experience) to be fully qualified and competent. The basis for the determination will be documented.

2. Section 1.2 of ANSI/ASME N45.2.6-1978, fourth paragraph, states that the requirements of this Standard apply to personnel of the owners and their suppliers. In clarification, the extent of application of the requirements of ANSI/ASME N45.2.6-1978 to Energy Northwest suppliers will depend upon the nature and extent of materials or services furnished, and as further described in Energy Northwest positions on Section 2.4 and 3 of ANSI/ASME N45.2.6-1978.

3. Section 2.1.2 of ANSI/ASME N45.2.6-1978 implies that personnel performing non-NDE type of inspections, examinations, and testing will be formally certified. Energy Northwest does not plan this formal certification. Instead, Energy Northwest will select such personnel to predetermined qualification requirements for the specific task based on their education, experience, and training. Formal training records, when used as the basis for qualification, will be maintained on file.

4. Section 2.3 of ANSI N45.2.6-1978 states that "Any person who has not performed inspection, examination, or testing activities in his qualified area for a period of one year shall be reevaluated. "A 90-day grace period can be applied to this activity."

5. Section 2.4 of ANSI/ASME N45.2.6-1978 requires issuance of formal certification to individuals and specifies the details of the information to be included in the certificate. Energy Northwest does not plan to issue formal certificates to individuals within the scope of ANSI/ASME N45.2.6-1978 and Regulatory Guide 1.8. However, information similar to that described in this section of the Standard will be available in documented form attesting that the individual is capable of performing the assigned task(s). Energy Northwest will use a similar approach in evaluating supplier compliance with this section of the Standard.

6. Section 3 of ANSI/ASME N45.2.6-1978 divides the capability requirements of inspection, examination, and testing personnel into three levels, namely Level I, Level II, and Level III. Energy Northwest will not assign these levels to its personnel performing inspection, examination, and testing activities. However, the selection of personnel for particular tasks will be such as to match the capabilities to the types of tasks and maintain the intent of the three levels. The judgement to determine that a person's qualifications and capabilities meet the intent of a certain level of inspection, examination, and testing function is made through the normal management process by using established administrative and personnel procedures. Documentation for such justification will be maintained on file. A similar approach will be used to evaluate the qualifications of non-NDE personnel of Energy Northwest suppliers.

II.10 REGULATORY GUIDE 1.64, REV. 2 (June 1976) - "Quality Assurance Requirements for the Design of Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.64, Rev. 2 (June 1976), subject to the following:

Regulatory Position C.2 of Regulatory Guide 1.64, Rev. 2 (June 1976) states that individuals performing design verification should not have immediate supervisory responsibility for the individual performing the design. It further states that while design verification by the immediate supervisor is encouraged, it should not be construed that such verification constitutes the required independent design verification. It is Energy Northwest's position that if the designer's immediate supervisor is the most technically qualified individual available in the organization to perform a design verification by design review, this review may be conducted by the supervisor, providing that:

a. The justification is individually documented and approved in advance by the supervisor's management and

b. Quality Assurance audits surveillances or assessments cover the frequency and effectiveness of use of supervisors as design verifiers to guard against abuse.

II.11 REGULATORY GUIDE 1.74 (February 1974) - "Quality Assurance Terms and Definitions"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.74 (February 1974), subject to the following:

1. Regulatory Position "C" of Regulatory Guide 1.74 (February 1974) specifies certain documents recommended be included in the definition of "procurement documents", defined in ANSI N45.2.10-1973. Energy Northwest will use the following definition:

   Procurement Documents - Purchase requisitions, purchase orders and contracts with attachments necessary to specify/verify requirements.

2. Section 2 of ANSI N45.2.10-1973: The definition of "specification" is revised to read as follows:

   Specification - A statement of a set of requirements to be satisfied by a product, a material, a service or process indicating, whenever appropriate, the procedure by means of which it may be determined whether the requirements given are satisfied.

II.12 REGULATORY GUIDE 1.88, REV. 2 (October 1976) - "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.88, Rev. 2 (October 1976), subject to the following:

1. Regulatory Position C.2 of Regulatory Guide 1.88, Rev. 2 (October 1976) endorses the 4-hour fire rating requirements for a single records storage facility as described in Section 5.6 of ANSI N45.2.9-1974. Energy Northwest modifies this 4-hour rating requirement of ANSI N45.2.9-1974 to 2-hour fire rating requirement. Accordingly, Energy Northwest will comply with a substitute to the third, fourth, and fifth paragraphs of Section 5.6 of ANSI N45.2.9-1974 which reads, "Where a single record storage is maintained, the QA records shall be maintained in any one of the following four (4):

   a. A 2-hour vault meeting NFPA (National Fire Protection Association) No. 232-1975 without additional provisions.

   b. 2-hour rated file containers meeting NFPA No. 232-1975 (Class B) without additional NFPA provisions.

   c. 2-hour rated fire resistant file room meeting NFPA No. 232-1975 with the following additional provisions:

      1) Early warning fire detection and automatic fire suppression shall be provided, with electronic supervision at a constantly attended central station.

      2) Records shall be stored in fully enclosed metal cabinets. Records shall not be permitted on open steel shelving. No storage of records shall be permitted on the floor of the facility. Adequate access and aisle ways shall be maintained at all times throughout the facility.

      3) Work not directly associated with records storage or retrieval shall be prohibited within the records storage facility. Examples of such prohibited activities include but are not limited to: records reproduction, film developing, and fabrication of microfiche cards.

      4) Smoking and eating/drinking shall be prohibited throughout the records storage facility.

      5) Ventilation, temperature, and humidity control equipment shall be protected inside with standard fire-door dampers where they penetrate fire barriers bounding the facility.

d. A 2-hour fire rated facility meeting the following criteria and provisions:

1) Reinforced concrete, concrete block, masonry, or equal construction.

2) Floor and roof with drainage control. If floor drain is provided, a check valve (or equal) shall be included.

3) Doors, structure and frames, and hardware shall be designed to comply with the requirements of a minimum 2-hour fire rating.

4) Sealant applied over walls as a moisture or condensation barrier.

5) Surface sealant on floor providing a hard wear surface to minimize concrete dusting.

6) Foundation sealant and provisions for drainage.

7) Forced air circulation with filter system.

8) Fire Protection System.

9) Only those penetrations used exclusively for fire protection, communication, lighting, or temperature/humidity control are allowed; all such penetrations shall be sealed or dampered to comply with the minimum 2-hour fire protection rating.

10) The construction details shall be reviewed for adequacy of protection of contents by a person who is competent in the technical field of fire protection and fire extinguishing.

11) If the facility is located within a building or structure, the environment and construction of that building can provide a portion or all of the criteria (1) through (9).

2. Section 3.2.2 of ANSI N45.2.9-1974 is revised to read, "Index - The quality assurance records shall be indexed. The indexing system(s) shall include, as a minimum, record retention times and the location of the records within the record system. The indexing system(s) shall provide sufficient information which can be used to identify item(s) or activity(ies)."

3. Section 5.4.3 of ANSI N45.2.9-1974 is revised to read, "Special Processed Records - Provisions shall be made for special processed records (such as radiographs, photographs, negatives, and microfilm) to prevent damage from excessive light, stacking, electromagnetic fields, and temperature. These provisions will be delineated in procedures and/or instructions which will incorporate, or take into consideration, available manufacturers' recommendations."

4. Section 5.2 of ANSI N45.2.9 - 1974 is revised by adding a new second paragraph as follows:

   In process Quality Assurance records may be maintained in temporary storage with the originating organization until transfer to the permanent plant file. Written storage procedures shall be prepared and a custodian designated with the responsibility to enforce the procedures. Storage procedures shall, at a minimum, address the following:

   a. Identification of the records that may be maintained in temporary storage, the type of storage (single or dual) and the record storage location.

   b. Use of lockable temporary storage containers with a minimum one hour fire rating and an Underwriters' Laboratory (UL) label (or equivalent). If the container does not have a fire rating label, the container should be certified by an individual competent in the field of fire protection.

   c. Use of "out" cards or other similar methods to track records removed from the file.

   d. Designation of a custodian with the authority to enforce the storage procedures.

   e. Provisions shall be made in the storage arrangement to prevent damage from condensation.

   f. Records shall not be stored loosely. Records shall be firmly attached in binders or placed in folders or envelopes for storage on shelving in containers. Steel file cabinets are preferred.

   g. Provisions shall be made for special processed records (such as radiographs, photographs, negatives, and microfilm) to prevent damage from excessive light, stacking, electromagnetic fields, and temperature. These provisions shall be delineated in procedures and/or instructions which will incorporate, or take into consideration, available manufacturers' recommendations.

II.13 REGULATORY GUIDE 1.94, REV. 1 (April 1976) - "Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Steel During the Construction Phase of Nuclear Power Plants"

Regulatory Guide 1.94, Rev. 1 (April 1976) is not considered applicable to operations phase activities. However, the Regulatory Position of Regulatory Guide 1.94, Rev. 1 (April 1976), where appropriate, will be implemented for those applicable operational phase activities that are comparable to construction phase activities.

II.14 REGULATORY GUIDE 1.116, REV. 0-R (May 1977) - "Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.116, Rev. 0-R, (May 1977), subject to the following:

1. Regulatory Position C.3 of Regulatory Guide 1.116, Rev. 0-R (May 1977) recommends that the requirements of Section 5 of ANSI N45.2.8-1975 pertaining to preoperational tests, cold functional tests, and hot functional tests should be used in conjunction with Regulatory Guide 1.68. Energy Northwest will comply with the implementation of Regulatory Guide 1.68 as described in Chapter 14, "Initial Test Program," of the Final Safety Analysis Report.

2. Section 2.3 of ANSI N45.2.8-1975, last sentence is revised to read, "Test reports shall include an evaluation of the acceptability of inspection and test results and provide for identifying the individual who performed the evaluation."

3. Section 2.8.2 of ANSI N45.2.8-1975 states, "Records of calibration shall be included in inspection and test results." Energy Northwest does not intend to include calibration records in inspection and test results. Instead, the calibration records will be maintained in a separate file.

4. Section 2.9.e(6) of ANSI.2.8.1975 states, "Evidence that engineering or design changes are documented and approved prior to installation." Energy Northwest may permit installation of an item prior to approval of the related engineering or design change provided procedural controls, requiring evidence of engineering or design change approval prior to placing the affected item into service, are instituted.

II.15 REGULATORY GUIDE 1.123, REV. 1 (July 1977) - "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.123, Rev. 1 (July 1977), subject to the following:

Section 1.3 of ANSI N45.2.13-1976: Energy Northwest will comply with the definition of "procurement documents" as stated in its position statement on Regulatory Guide 1.74 (February 1974).

II.16 REGULATORY GUIDE 1.144, REV. 1 (September 1980) - "Auditing of Quality Assurance Programs for Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.144, Rev. 1 (September 1980), subject to the following:

a. Supplier Audits - Section C.3.b(2) of Reg. Guide 1.144. Revision 1 states that audits be performed on a "triennial basis." A 90-day grace period can be applied to this activity.

b. Supplier Evaluations - Section C.3.b(2) of Reg. Guide 1.144 Revision 1 states that documented evaluations be performed "annually." A 90-day grace period can be applied to this activity.

c. Revised commitment to perform vendor audits from "at least every three years" to "on a triennial basis" to be consistent with the wording used in RG 1.144, Revision 1, Section C.3.b(2).

Section 4.4.4 of ANSI N45.2.12-1977 requires the audit report to include an evaluation statement regarding the effectiveness of the quality assurance program elements that were audited. Since the audit by its very nature is an evaluation of the quality assurance program effectiveness, the audit report itself is considered to be an evaluation of the quality assurance program effectiveness. Therefore, this section of the Standard is revised to read "A Summary of Audit Results."

II.17 REGULATORY GUIDE 1.146, (August 1980) - Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"

Energy Northwest will implement the Regulatory Position of Regulatory Guide 1.146 (August 1980) to ANSI N45.2.23-1978, subject is the following:

Lead Auditor Recertifications – Sections 3.2 and 5.3 of ANSI N45.2.23-1978 require that an annual assessment be performed of each lead auditor's qualification and that each lead auditor's records be updated annually. A 90-day grace period can be applied to this activity.

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 Energy Northwest 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 PROGRAM (NSAP)

1.1 The NSAP is implemented 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 NSAP shall provide 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 NSAP shall be implemented by several on-site personnel who are independent of the plant management chain. 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 NSAP shall also include 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 Written records of activities associated with the NSAP shall be prepared, maintained, and forwarded 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.

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;

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.

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

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 technical staff and / or from outside Energy Northwest. 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. The membership shall, as a minimum, collectively have the experience and competence to review problems 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.

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.

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.

2.2.8 Program reviews and audits of unit activities shall be performed under the cognizance of the CNSRB. Audit schedules assure that the following areas are audited at indicated frequencies or more frequently as performance dictates.

a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 24 months.

b. The performance, training and qualifications of the entire unit staff at least once per 24 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 24 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 licensee QA personnel.

f. Each element of the Emergency Plan and implementing procedures as defined by 10 CFR 50.54(t).

g. Each element of the Security Plan and implementing procedures as defined by10 CFR 50.54(p) and 10 CFR 73.55.

h. The fire protection equipment and program implementation, at least once per 12 months using either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be used at least once every third year.

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 24 months.

k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.

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 24 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.

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.

5.0 RECORD RETENTION

A Records Disposition Program was established to manage the identification, retention, retirement and disposal of Energy Northwest records and documents. Refer to the Records Disposition Program to ensure 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.

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.

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.