



Kewaunee Nuclear Power Plant  
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Point Beach Nuclear Plant  
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Two Rivers, WI 54241  
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Kewaunee / Point Beach Nuclear  
Operated by Nuclear Management Company, LLC

NRC-02-046

June 5, 2002

10 CFR 50.54(a)(3)

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Ladies/Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Revision 22 of the Operational Quality Assurance Program Description (OQAPD)

Reference: 1) Letter from M. E. Reddemann (NMC) to NRC Document Control Desk,  
dated August 13, 2001

In accordance with the requirements of 10 CFR 50.54(a)(3), this letter submits for review the current Operational Quality Assurance Program Description (Revision 22) for the Kewaunee Nuclear Power Plant. Revision 21-B of this document was previously submitted to the Nuclear Regulatory Commission (NRC) for review on August 13, 2001 (Reference 1).

Attachment 1 to this letter contains the Operational Quality Assurance Program Description (Revision 22, dated May 22, 2002). Attachment 2 to this letter identifies the changes made to the description, the reason for the changes, and the basis for the changes not involving a reduction in Quality Assurance Program commitments. Attachment 3 to this letter provides for reference only, a strikeout version of the OQAPD, highlighting the differences between revisions 21-B and 22.

The revisions to the OQAPD include organizational changes, administrative and editorial clarifications, and changes to incorporate quality assurance program alternatives permitted under 10 CFR 50.54(a)(3). The more significant changes to the OQAPD include:

Book

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1. Transfer of responsibilities for the Off-Site Review Committee from NMC President & CEO to NMC Executive Vice President & CNO.
2. Incorporation of the term, "implementing documents" in place of the specific terms, "directives, procedures, and instructions" to broaden the scope and provide flexibility in the development and use of documents used to implement the QA program requirements.
3. Elimination of the requirement for Nuclear Oversight Manager review of directives.
4. Elimination of Nuclear Oversight in-line review of purchase requisitions.
5. Transfer of responsibilities for Supplier Quality Assurance activities to NMC Corporate Manager - Supplier Assessment.
6. Updates to the Plant Operational Review Committee responsibilities to incorporate revised 10 CFR 50.59 regulations.
7. Incorporation of language to permit single record storage of permanent records at qualifying facilities other than the KNPP Records Vault.
8. Elimination of the five (5) year interval requirement for auditing Technical Specification line items.

This submittal identifies changes made in conjunction with Revision 22 of the Operational Quality Assurance Program Description (OQAPD). NMC has determined that these changes strengthen and enhance the implementation of the Quality Assurance Program, and that none of the changes reduce the level of Quality Assurance Program commitments previously reviewed and accepted by the NRC.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects, these statements are not based entirely on my personal knowledge, but on information furnished by cognizant NMC employees and consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

Sincerely,



Mark E. Warner  
Site Vice President

BLK  
Attach.

cc- US NRC Senior Resident Inspector  
US NRC, Region III

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June 5, 2002

Attachment 1

to

Letter from M. E. Warner (NMC) to NRC Document Control Desk

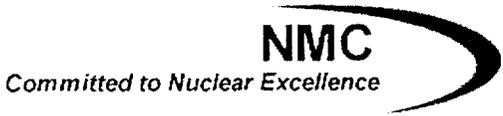
dated

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Operational Quality Assurance Program Description

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**Nuclear Management Company, LLC**

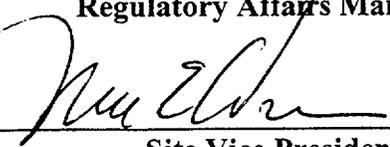
**Kewaunee Nuclear Power Plant**

**Operational Quality Assurance Program Description**

**Revision: 22**

**Date: June 5, 2002**

Reviewed By:  05/23/02  
Regulatory Affairs Manager / Date

Approved By:  6/3/02  
Site Vice President / Date

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## INTRODUCTION

The policy of Nuclear Management Company, LLC is to comply with the requirements of the Operational Quality Assurance Program (OQAP) which is authorized under the direction of the President & CEO – Nuclear Management Company. The OQAP fulfills the requirements of 10CFR50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." Compliance with the OQAP is mandatory for applicable Nuclear Management Company and Wisconsin Public Service Corporation employees. Equivalent measures appropriate to the circumstance shall be enforced upon suppliers of materials, equipment or services.

Wisconsin Public Service Corporation (WPSC) entered into a Nuclear Power Plant Operating Services Agreement (NPPOSA) with the Nuclear Management Company, LLC (NMC). Under the service agreement, the NMC is designated as the Contracting Owner of the Facility Operating License (NRC No. 50-305) for the Kewaunee Nuclear Power Plant and is responsible for the operation and maintenance of the plant in accordance with the terms and conditions of the license. Ownership of the Kewaunee Nuclear Power Plant assets remains with Wisconsin Public Service Corporation and is not affected by the transfer of operating authority.

The Operational Quality Assurance Program is established to define, implement and audit operation, maintenance, and modification activities related to nuclear plant safety. The OQAP complies with the provisions of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," with exceptions, interpretations, and qualifications noted in Appendix A of this description.

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## 1.0 **ORGANIZATION**

### 1. **General Requirements**

The NMC shall be responsible for the establishment and implementation of the Operational Quality Assurance Program. All members of the organization involved in operation of the Kewaunee Nuclear Power Plant (KNPP) shall be made aware of and recognize the necessity for well formulated and detailed administrative controls to assure safe and efficient operation. Lines of authority, responsibility and communication are established under the direction of the NMC President & Chief Executive Officer and identify all levels of management involved in the OQAP, (See Figures 1, 2 & 3). The quality assurance functions performed by each organizational element are cited in the descriptions below.

### 2. **Duties and Responsibilities – Nuclear Management Company Offsite (Figure 1)**

#### **President & Chief Executive Officer (CEO)**

This position is responsible for providing top level direction of all activities associated with the safe and reliable operation of NMC's nuclear sites. Lines of authority and responsibility are established under the direction of the President & CEO for implementation of the Quality Assurance Program. This position has delegated specific authority and responsibilities as described in the following, and as shown in Figure 1.

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Executive Vice President & Chief Nuclear Officer (CNO)

This position has responsibility for all matters relating to the operation and maintenance of the Kewaunee Nuclear Power Plant. The President & CEO has also delegated to this position the overall responsibility and authority for the implementation of the NMC Quality Assurance Program requirements and the activities of the Offsite Review Committee. Reporting to the Executive Vice President & Chief Nuclear Officer, are the Senior Vice President Operations, Senior Vice President Nuclear Support Programs, Vice President Assessment Programs, and Vice President Training. The Executive Vice President & CNO has delegated specific authority and responsibility to these positions as shown in Figure 1.

Senior Vice President – Operations

This position is responsible for managing the site organizations' operations by directing and coordinating activities consistent with established goals, objectives, and policies. This position is responsible for implementation of directions set by the CNO, President, and Board of Directors, providing direction and structure for the operating units, and participating in the development of policies and strategic plans affecting nuclear operations. Reporting to this position is the Site Vice President, Director - Regulatory Affairs & Strategic Issues and the Director - Outage. Respectively, these positions are responsible for the overall leadership of the site organization, regulatory and licensing services, including license renewal programs, and focused outage management.

Senior Vice President – Nuclear Support Programs

This position, along with Vice President, Director, and Manager support, is responsible for Kewaunee Nuclear Power Plant nuclear fuel design and supply,

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engineering services and programs, and industrial safety and health, radiation protection, chemistry, and emergency preparedness programs.

Vice President - Assessment Programs

This position is responsible for the overall NMC Quality Assurance Program development and maintenance, oversight and assessment activities. This position, along with Director and Manager support is responsible for the internal assessment (audit) program, supplier assessment (qualification) program, quality control program, performance assessment program, self assessment program, corrective action program, off-site review committee coordination, and Employee Concerns Program.

Vice President - Training

This position, along with Director and Manager support is responsible for the development of corporate training programs and processes, including leadership development.

Senior Vice President – Business & Operations Support

This position is responsible for the areas of administrative, human resources, information technology, security, supply chain, and integrated work management.

Senior Vice President - Business Development

This position is responsible for the development and implementation of NMC business growth strategies, business integration of NMC sites and corporate communications. Corporate communications provides support in the implementation of the site Emergency Plan.

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**3. Duties and Responsibilities – Wisconsin Public Service Corporation Offsite (Figure 2)**

Director – Nuclear Oversight

This position reports directly to the Chairman, President & Chief Executive Officer of Wisconsin Public Service Corporation (WPSC) and is responsible for monitoring and managing of the KNPP asset, performing cost benefit analysis and those licensing responsibilities associated with KNPP that are maintained within WPSC. This position is responsible for interface activities with the Nuclear Management Company.

Assistant Vice President - Corporate Services

This position reports to the WPSC Chairman and Chief Executive Officer for nuclear responsibilities. This position is responsible for the implementation of the Operational Quality Assurance Program requirements associated with the activities affecting quality performed by the Purchasing and Stores, Project Services, Information Technology, and Environmental Services organizations. Purchasing and Stores is responsible for providing support to procurement activities for KNPP. Project Services is responsible for providing engineering and design support for KNPP physical facilities, as requested. Information Technology Services is responsible for providing computer system support for KNPP. Environmental Services is responsible for providing and overseeing the Hazardous Chemical Control and Waste Management Plans.

Manager – Substation and Transmission

This position reports to the Vice President - Distribution and Customer Service and is responsible for substation and transmission activities and the implementation of

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the quality assurance requirements associated with these functions. The Substation and Transmission Group is responsible for implementing the OQAP, as applicable, whenever their work involves KNPP.

4. **Duties and Responsibilities – Nuclear Management Company Onsite (Figure 3)**

**Site Vice President**

This position is responsible for the overall leadership of the site organizations and activities associated with safe and reliable operation of the Kewaunee Nuclear Power Plant and implementation of the OQAP requirements. Reporting to this position are the Site Operations Director, Business Manager and Assessment Manager. Indirectly reporting to this position are the areas of Nuclear Oversight, Human Resources and Employee Concerns Program. This position maintains authority and responsibility for specific NRC correspondence such as 10CFR21 reports, license amendments and written correspondence signed under oath or affirmation in accordance with 10 CFR 50.54(f). This position has delegated specific authority and responsibilities as described in the following and as shown in Figure 3.

**Site Operations Director**

This position is responsible to the Site Vice President for providing focused management direction of operational issues associated with the Kewaunee Nuclear Power Plant. Reporting directly to this position are the Plant Manager, Services Manager and Training Managers. Indirect reports to this position include the Site Engineering Director.

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Plant Manager

This position is responsible to the Site Operations Director for the safe and reliable operation and maintenance of the plant in accordance with the requirements of the OQAP and is responsible for the functions of the Plant Operations Review Committee. This position has the responsibility for the review, approval, and verification of implementation of activities affecting quality for designated areas of responsibility. These areas include maintenance, operations, outages and scheduling, and indirectly the industrial safety and health program, as described below:

Plant Maintenance – (Electrical/Mechanical/Instrument & Control) - is responsible for implementation of the corrective and preventative maintenance programs.

Plant Operations – is responsible for plant operations including general supervision of all shift operating personnel and shift technical advisors. Operations maintain the authority and responsibility for system status control and equipment operation during all modes of plant operation and under emergency conditions in accordance with the site license and Technical Specifications.

Outages and Scheduling – is responsible for plant outage coordination activities, administration of the work control system, and planning and scheduling for routine and corrective maintenance activities.

Industrial Safety and Health - is responsible for assisting in establishing and monitoring the implementation of industrial safety and health policies at the site for the protection of workers from industrial hazards. This area reports to the NMC Manager Operations Programs.

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Site Engineering Director

This position is responsible for the leadership and supervision of the site Engineering organization and functions of the Quality Assurance Typing Committee. This position is responsible to the Vice President Engineering and indirectly to the Director Site Operations. This position ensures that engineering support is provided to the Kewaunee Nuclear Power Plant. The aspects of this support include, but are not limited to, the evaluation and implementation of physical changes to the plant, engineering evaluations of plant performance, administration and implementation of engineering programs, providing specialized analytical skills as needed to support the plant, and providing engineering support on a plant systems basis. Reporting indirectly through this position for nuclear fuel activities is the Project Manager Kewaunee/Point Beach, who reports through the NMC Director Nuclear Fuels. This position has the responsibility for review, approval, and verification of implementation of activities affecting quality for designated areas of responsibility. These areas are described below:

Design Engineering – is the primary design organization for the site, responsible for the preparation and implementation of permanent and temporary design changes and plant modifications, including when required, supporting design analysis, calculations or evaluations. Examples of design analysis activities include piping support and stress analysis, electrical distribution and protection coordination, equipment set point analysis, and component seismic analysis. Personnel performing analysis are responsible for assuring that selected analytical software products comply with QA criteria for safety-related software controls where applicable. This organization is also responsible for drawing control and the development and maintenance of design specifications and standards.

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Program Engineering – is responsible for the administration and management of site engineering programs. Engineering program functional areas are responsible for providing the program specialist for the applicable program. The program specialist is responsible for the management of the program, program performance and implementation. Project teams will be created when appropriate by supplementing the program engineering staff with other NMC staff. Responsibilities of the specialist and team include interaction with customers and senior nuclear management, as necessary. The program team has complete ownership of the program, i.e., responsibility and accountability for successful implementation of the program. Examples of program areas include:

Containment Leak Rate Testing	Heat Exchanger Performance
Environmental Qualification	Non-Destructive Examination
Flow Accelerated Corrosion	Probabilistic Risk Assessment
Fire Protection	Reactor Engineering
In-Service Inspection	Reactor Pressure Vessel Integrity
In-Service Testing	USAR Safety Analysis

Equipment Performance Engineering – is responsible for monitoring and improving the performance of plant equipment. Functional responsibilities include system and component engineering, maintenance engineering, preventative maintenance optimization and predictive maintenance technology application. This organization is also responsible for the implementation and management of the maintenance rule program.

Engineering Process / Support – is responsible for providing process support of the engineering department activities. Functional responsibilities include performance

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and coordination of corrective action program and self-assessments within the engineering department, planning and scheduling of engineering interfaces with plant activities and the development and monitoring of department performance.

Services Manager

This position is responsible to the Director Site Operations for plant activities associated with Chemistry, Radiation Protection and Emergency Preparedness. Indirect responsibility also includes site Security activities. This position has the responsibility for review, approval, and verification of implementation of activities affecting quality for designated areas of responsibility.

Radiation Protection – is responsible for radiation protection and health physics activities, radioactive waste processing, off site dose calculation and radiological environmental monitoring programs.

Chemistry – is responsible for site chemistry activities, including process control monitoring of plant systems and environmental monitoring of waste discharges from the site.

Emergency Preparedness - is responsible for the maintenance of an effective emergency preparedness program. Specific responsibilities and duties for the various nuclear emergency preparedness activities are defined in implementing documents.

Security - is responsible for plant physical security, access authorization and fitness for duty programs. Specific responsibilities and duties for the various security

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activities are defined in the appropriate implementing documents. The Security organization reports directly to the NMC Director Security.

Training Managers

Under the direction of the Operations and Technical Training Managers, training has been delegated the responsibility to develop, maintain, and provide employee training that meets the needs of the Kewaunee Nuclear Power Plant (KNPP). The Training organization is responsible for the accredited training programs as described in National Academy of Nuclear Training documents. Specific responsibilities and duties for the various training activities are defined in the appropriate implementing documents.

Business Manager

This position is responsible to the Site Vice President for providing general support to the site organization in key business related areas, including administrative support, procedures and document control, information and records management and project management. Reporting indirectly to this position are the areas of Supply Chain and Information Technology. These areas receive direction from NMC corporate staff and support from WPSC corporate staff.

Procedures and Document Control – is primarily responsible for the administrative control and issuance of site implementing documents associated with OQAP activities for the Kewaunee Nuclear Power Plant.

Information and Records Management - is primarily responsible for receipt, maintenance, and overall control and storage of records associated with the Kewaunee Nuclear Power Plant.

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Information Technology – is responsible for the general onsite computer support and services, including the site software configuration management program.

Supply Chain – is responsible for the procurement process for materials and services for the Kewaunee Nuclear Power Plant. The Supply Chain organization is responsible for procurement engineering, warehousing and storage functions, and material control.

Assessment Manager

This position is responsible for the leadership and supervision of the Assessment organization, which includes corrective action, human performance and operational experience assessment programs. Reporting indirectly to this position are the areas of Regulatory Affairs (Licensing) and Self Assessment. The areas of Regulatory Affairs and Self Assessment receive direction and support from NMC corporate staff.

Nuclear Oversight Manager

This position is responsible to the Director – Nuclear Oversight and indirectly to the Site Vice President for ensuring that an Operational Quality Assurance Program (OQAP) is developed, implemented, and maintained to meet the licensing requirements and management objectives. This position is responsible for final review of changes to the OQAP. The Nuclear Oversight Manager is independent of cost and scheduling considerations and has the authority and organizational freedom to identify quality problems, stop work on non-conforming activities associated with modifications (new construction) until deficiencies have been corrected; initiate, recommend or provide solutions, and verify implementation of corrective actions. The Nuclear Oversight Manager maintains stop work authority

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for nonconforming activities associated with plant operations by reporting them to the Plant Manager. This position is responsible for ensuring that functions and activities of the Nuclear Oversight staff are controlled and performed in accordance with approved documents, which implement the requirements of the OQAP.

The Nuclear Oversight Manager shall as a minimum meet the requirements of ANSI N18.1-1971, and should have a minimum of a B. S. degree in Science or Engineering from an accredited college or university, a minimum of five years experience in power plant construction, engineering and/or plant operation, and a familiarity with codes and regulations.

The Nuclear Oversight staff has the responsibility for verifying the effectiveness of plant quality activities. The Nuclear Oversight staff is comprised of Quality Control and Internal Assessment. Reporting indirectly to this position is the Supplier Assessment area.

Quality Control - is responsible for inspection activities, which includes but is not limited to, material receipt, QC hold points, NDE, and other activities normally associated with traditional quality control.

Internal Assessment - is responsible for programmatic reviews and observations of activities affecting quality to determine program effectiveness and assessments normally associated with quality assurance auditing.

Supplier Assessment - is responsible for assessment (audit, survey or surveillance) of supplier quality assurance programs for qualification and use in procurement activities. This area reports directly to the NMC Manager Supplier Assessment.

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Offsite Review Committee (OSRC)

OSRC is responsible to the NMC Executive Vice President & CNO for review and assessment of plant related matters concerning safety. The requirements for personnel, committee composition, meeting frequency, quorum and meeting records shall be as identified below and in accordance with the requirements of the OSRC Charter. The Committee periodically reviews the results of the Nuclear Oversight assessments and is responsible for conducting reviews as part of the Independent Technical Review Program.

1. Function

The OSRC shall function to provide independent review and assessment of designated activities in the areas of:

- A. Nuclear Power Plant Operations
- B. Nuclear Engineering
- C. Chemistry and Radio-Chemistry
- D. Metallurgy
- E. Instrumentation
- F. Radiological Safety
- G. Mechanical and Electrical Engineering
- H. Quality Assurance Practices
- I. Other appropriate fields as determined by the Committee, to be associated with the unique characteristics of the nuclear power plant.

2. Composition

The OSRC shall be composed of, but not necessarily limited to:

- A. At least three technically qualified persons who are not members of the plant staff.

- B. One member from the supervisory staff of the plant.
- C. At least two qualified non-company affiliated technical consultants.
- D. In-house staff management advisors as required.

The Committee membership and its Chairman and Vice Chairman shall be appointed by the NMC Executive Vice President & CNO. Each member of the OSRC shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of five years technical experience, of which a minimum shall be in one or more areas given in paragraph 1., "Function".

3. Alternates

Alternate members shall be appointed by the OSRC Chairman, to serve on a temporary basis; however, no more than two alternates shall participate in OSRC activities at any one time.

4. Consultants

Consultants may be utilized as determined by the Chairman - OSRC to provide expert advice to the OSRC.

5. Meeting Frequency

The OSRC shall meet at least once every six months.

6. Quorum

A quorum of the OSRC shall consist of the Chairman or Vice Chairman and four members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the plant.

7. Review

The OSRC shall review:

- A. 10 CFR 50.59 evaluations for 1) changes to the facility or procedures and 2) tests or experiments not receiving prior NRC approval to verify that such actions did not require NRC approval.
- B. Proposed changes to the facility or procedures requiring prior NRC approval per 10 CFR 50.59.
- C. Proposed tests or experiments requiring prior NRC approval per 10 CFR 50.59.
- D. Proposed changes in Technical Specifications or licenses.
- E. Reports covering violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- F. Reports covering significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- G. Reports covering all Reportable Events.
- H. Reports covering any indication of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- I. Reports and meeting minutes of the PORC.

8. Assessments

Independent assessments (audits) of plant activities shall be performed under the cognizance of the OSRC. These shall include:

- A. Conformance of plant operation to the provisions contained within the Technical Specifications and applicable license conditions.

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- B. Performance, training, and qualifications of the entire plant staff.
- C. Results of all actions taken to correct deficiencies occurring in plant equipment, structures, systems, or method of operation that affect nuclear safety.
- D. Performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR Part 50.
- E. The Plant Fire Protection Program, implementing procedures and the fire protection and loss prevention program.
- F. Any other area of plant operation considered appropriate by the OSRC or the NMC Executive Vice President & CNO.
- G. The Radiological Environmental Monitoring Program and the results thereof.
- H. The Off-site Dose Calculation Manual and implementing procedures.
- I. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes.

9. Authority

The OSRC shall report to the NMC Executive Vice President & CNO and shall advise the CNO on those areas of responsibility specified in paragraph 7, "Review" and paragraph 8, "Assessments".

10. Records

Records of OSRC activities shall be prepared, approved and distributed as follows:

- A. Minutes of each OSRC meeting shall be approved by the OSRC Chairman and forwarded to the NMC Executive Vice President & CNO within 14 days following each meeting.

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- B. Reports of reviews required by paragraphs 7.E through 7.H, shall be forwarded to the NMC Executive Vice President & CNO within 14 days following completion of the review.
- C. Reports of assessments performed by OSRC shall be forwarded to the NMC Executive Vice President & CNO and to the management positions responsible for the areas assessed within 30 days after completion of the assessment.

#### Plant Operations Review Committee (PORC)

PORC is responsible to the Plant Manager for providing advice on matters relating to nuclear safety at the plant. The requirements for personnel, committee composition, meeting frequency, quorum and meeting records shall be as identified below and in the PORC Charter. PORC is also responsible for conducting reviews as part of the Independent Technical Review Program.

##### 1. Function

The PORC shall function to advise the Plant Manager on matters related to nuclear safety.

##### 2. Composition

The PORC shall be composed of key supervisors of the on-site staff from the following disciplines: Operations, Maintenance, Instrument and Control, Reactor Engineering, Quality, and Radiological Protection.

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3. Alternates

Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates for required members shall participate in PORC meetings at any one time.

4. Meeting Frequency

The PORC shall meet at least once per calendar month and as convened by the Chairman.

5. Quorum

A quorum of the PORC shall consist of the chairman (or his designated alternate) and a majority of the required members including temporary alternates.

6. Responsibilities

The PORC shall be responsible for:

- A. Review of operating, maintenance and other procedures including emergency operating procedures which affect nuclear safety as determined by the Plant Manager. Changes to those procedures are made in accordance with the provisions of TS 6.8.
- B. Review of all proposed tests and experiments that affect nuclear safety.
- C. Review of all proposed changes to the Technical Specifications.
- D. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- E. Review of all proposed changes to the Security Plan, Fire Plan, and their respective implementing procedures.

- F. Review all reports covering the investigation of all violations of the Technical Specifications and the recommendations to prevent recurrence.
- G. Review plant operations to detect potential safety hazards.
- H. Performance of special reviews and investigations and prepare reports thereon as requested by the Chairman - Offsite Review Committee.
- I. Review of all Reportable Events.
- J. Review of changes to the Process Control Program, the Off-Site Dose Calculation Manual, and the Radiological Environmental Monitoring Manual.
- K. Review 10CFR50.59 evaluations to determine if prior NRC approval is required.

7. Authority

The PORC shall:

- A. Recommend to the Plant Manager approval or disapproval of items considered under preceding paragraph 6.
- B. Provide prompt notification in the form of meeting minutes to the Site Vice President and the Chairman - Offsite Review Committee of disagreement between the PORC and the Plant Manager. The Plant Manager shall have responsibility for resolution of such disagreements.

8. Records

Minutes shall be kept of all meetings of the PORC and copies shall be sent to the Site Vice President and the Chairman - Offsite Review Committee.

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**QUALITY ASSURANCE TYPING COMMITTEE**

This Committee is responsible to the Site Engineering Director for changes to classification of systems, structures and components within the nuclear power plant according to the importance of the function they serve with respect to plant safety and operability. The description of the committee's duties and authority shall be established in implementing documents and the QA Typing Committee Charter.

**2.0 QUALITY ASSURANCE PROGRAM**

**1. General**

The Operational Quality Assurance Program complies with the requirements of 10CFR50, Appendix B, the provisions of ANSI N18.7-1976 and the Regulatory Guides which endorse the daughter standards required by ANSI N18.7-1976 with the exceptions, interpretations, and qualifications noted in Appendix A of this description. The requirements of the OQAP apply to those activities which affect the quality of structures, systems or components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. All structures, systems, and components are classified as QA Type 1, 2, 3 or N according to their function and importance in relation to the safe operation of the reactor, with emphasis on the degree of integrity required to protect the public. The OQAP requirements are mandatory for all QA Type 1 items. QA Type 2 and 3 items, as determined by management, may require special control and an "X" modifier may be added to the QA2 or QA3 type designation. All components and/or systems which are identified as Nuclear Safety Design Class I in the Updated Safety Analysis Report (USAR) shall be categorized as QA Type 1. All nuclear fuel and core components shall be categorized as QA Type 1. The definitions and a list of the Nuclear Safety Design Classes for major structures,

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systems and components are found in the Kewaunee USAR Appendix B.2 and Table B.2-1.

During construction, QA types were established for plant equipment by a QA typing committee. The QA types for equipment subsequently added to the plant are established by the Responsible Engineer who installs the equipment under the Plant Physical Change program. The Plant Physical Change program exists under the requirements of the OQAP. Therefore, the QA types of equipment added since construction are controlled under the OQAP and its definitions. A change to an established QA type must be approved by the QA Typing Committee.

**2. Requirements**

It is mandatory for applicable employees to comply with the OQAP. It is the responsibility of the management charged with the implementation of the program to inform personnel working for them that the quality policies, OQAP manual, and procedures have mandatory requirements which must be implemented and enforced. The Training Managers are responsible for conducting training sessions as necessary to keep individuals informed of policies and changes to the OQAP. The lesson plans for these training sessions will be prepared under the cognizance of the Nuclear Oversight staff.

The OQAP shall be applied to all activities affecting safety-related functions and include: physical changes, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, modifying, engineering, and training. The control over these activities shall be applied to an extent consistent with their importance to safety and shall take into account the need for special controls, processes, tests, equipment, tools,

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and skills to attain the required quality, and the need for verification of quality by inspection, evaluation, or test.

**3. Structure**

The OQAP manual is the top level quality program document for operational phase activities. The OQAP is a manual which incorporates the requirements of 10CFR50 Appendix B, the provisions of ANSI N18.7-1976 and ANSI N45.2.23-1978 and Regulatory Guides 1.8-Rev. 1, 1.30, 1.37, 1.38-Rev. 2, 1.39-Rev. 1, 1.54, 1.58-August, 1973, 1.64-Rev. 2, 1.74, 1.88-Rev. 2 and 1.94. The requirements and responsibilities identified by the manual are implemented through implementing documents, such as, directives, procedures, and instructions, which prescribe activities affecting quality. Knowledgeable personnel other than the originator, provide technical reviews of implementing documents.

Implementing documents are reviewed for consistency with the OQAP and approved by the appropriate responsible Director/Manager, or designee. These implementing documents are prepared to govern activities affecting quality, such as physical changes, procurement, licensing, training, document control, operation, procedure control, material control, maintenance, and other related activities.

Implementing documents for fuel management are reviewed and approved by the Project Manager – Kewaunee/Point Beach and are prepared to govern fuel management activities affecting quality, such as fuel procurement, reactor core performance and analysis, core design, and other related activities.

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**4. Management Review**

Management above or outside the Nuclear Oversight organization shall routinely be informed of the status and adequacy of the OQAP. Independent assessments (audits) of implementing documents shall be conducted to verify conformance to the program. Nonconformances or differences of opinion, which cannot be settled between Nuclear Oversight and the department involved shall be brought to the attention of upper management for resolution.

**5. Indoctrination and Training**

A training program shall be established in order to provide for developing and maintaining a staff qualified to operate, maintain and provide the necessary technical support. The indoctrination and training program shall provide for:

- A. Training personnel responsible for performing quality-affecting activities as to the purpose, scope and implementation of the quality-related manuals, instructions, and procedures.
- B. Establishing the scope and depth of indoctrination and training to be provided commensurate with the level of quality-affecting activities being performed by an individual.
- C. Training personnel who perform quality-affecting activities in the principles and techniques of the activity being performed.
- D. Training and retraining on an as-needed basis to maintain a level of quality commensurate with the quality-affecting activity being performed.
- E. Maintaining records of training sessions, attendance and content of the training session.

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### 3.0 DESIGN CONTROL

Modifications to systems that are nuclear safety related, or as described in the USAR, and considered significant for nuclear safety shall be controlled by a Plant Physical Change Program established by implementing documents to ensure compliance with the existing design and the requirements of 10CFR50.59. Administrative controls shall be described in implementing documents to augment the following aspects of the Plant Physical Change Program:

1. Establish the structure, authority and responsibilities of the groups or positions involved in design change activities.
2. Correctly translate design inputs into specifications, drawings, procedures, or instructions.
3. Identify and select the appropriate quality standards in design documents.
4. Select and review the suitability of materials, parts, equipment and processes essential to the safety-related functions of the structure, system, or component.
5. Assure that computer software, which is an integral part of the operation of equipment, is designed, documented and tested adequately.
6. Assure the change is subject to at least the same measures applied to the original design, and provide for a second level review.
7. Assign the responsibilities of all organizations involved in the Plant Physical Change process, both internal (KNPP) and external (contractor, vendor) and ensure a method of exchanging technical information across internal and external interfaces.

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#### 4.0 PROCUREMENT DOCUMENT CONTROL

Measures shall be established in implementing documents to provide for the preparation of procurement documents to ensure that applicable regulations, design bases, and other QA program requirements are included or referenced. Procurement documents shall include, as appropriate: the scope of work; technical requirements; documentation requirements; requirements for hold and witness points; the allowance for access to supplier's facilities for review or audit of documentation or manufacturing procedures; and requirements that the supplier has a documented QA program in accordance with 10CFR50, Appendix B which includes a means for disposition of nonconformances.

The implementing documents shall include measures to ensure that procurement documents are reviewed and approved by qualified and authorized personnel prior to release. The implementing documents shall also provide assurance that the procurement document review includes verification that quality requirements are stated in such a manner, that through source surveillance and inspecting, supplier assessments, or receipt inspection, the quality of the procured items may be verified.

#### 5.0 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Measures shall be established in appropriate implementing documents to control the preparation, format, content, and use of operating, test and maintenance procedures, and approvals for same. When required, they shall be prepared in sufficient detail to provide adequate guidance in performing activities affecting quality. Implementing documents shall include, as appropriate, initial conditions,

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step-by-step instructions, sign-off steps, acceptance criteria, etc., to ensure that activities affecting quality have been satisfactorily completed.

A Plant Physical Change Program shall be established through implementing documents to assure that instructions, procedures, and drawings are used, where appropriate, to control activities associated with the modification of safety systems described in the USAR. These implementing documents shall establish a method to update drawings, procedures, and other technical documents associated with the plant modification.

## **6.0 DOCUMENT CONTROL**

The generation, distribution, and revisions of documents that establish specifications or activities affecting quality shall be controlled through implementing documents. These implementing documents shall provide for the following document control measures:

1. Identification of individuals or organizations responsible for preparing, reviewing, approving, and issuing documents and revisions, thereto.
2. Identifying and providing the proper documents to be used in performing safety-related activities.
3. Establishing distribution.
4. Establishing a method of providing up-to-date documents to the controlled files.

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**7.0 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES**

Suppliers of material, equipment and services, including suppliers of spare or replacement parts, shall be selected based on an evaluation of the supplier's capability to provide the purchased items or services in accordance with the requirements of the procurement documents. Implementing documents shall include methods for source evaluation and selection. One or more of the following considerations shall be included for source evaluation: evaluation of the supplier's history of providing a product which performs satisfactorily in actual use; review of industry directories; review of whether the prospective supplier has a quality assurance program reviewed and inspected by the NRC under the Vendor Inspection Program; review of whether the prospective supplier has been recently audited by NUPIC (Nuclear Utilities Procurement Issues Committee) or similar third party inspection publication; review and evaluation of the supplier's Quality Assurance Program, Manual and Procedures, and the supplier's design and manufacturing capability; and a NMC survey of the prospective supplier's technical and quality capability by directly evaluating his facilities, personnel and the implementation of his quality assurance program.

A Qualified Suppliers List shall be established and maintained through implementing documents developed under criteria imposed by the Operational Quality Assurance Program. Material, equipment, or services purchased from suppliers not on the Qualified Suppliers List shall undergo a review and evaluation to ensure conformance to the acceptable criteria established by the Quality Assurance Program. Implementing documents shall also establish control measures to ensure that documentary evidence of the conformance of material and equipment to procurement requirements is available prior to installation or use.

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## 8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

Controls established for procurement shall ensure that safety-related materials, parts, and components are purchased under the requirements and documentation established by the Operational Quality Assurance Program. Implementing directives shall provide for a documented receipt and inspection of incoming material and equipment, along with providing a system for identifying the status of acceptable items to ensure use and installation of only correct and acceptable materials. Identification and traceability of safety-related materials, parts, or components from issuance to installation within the plant shall be provided by this system.

## 9.0 CONTROL OF SPECIAL PROCESSES

Special processes including welding and non-destructive examination shall be accomplished under controlled conditions by qualified personnel, in accordance with applicable codes, standards, specifications, criteria, and other special requirements. The Operational Quality Assurance Program is established to ensure compliance and implementation of these requirements.

## 10.0 INSPECTION

Concerning material receipt, implementing documents shall establish receipt inspection under the control of the Nuclear Oversight Manager, which provides for visual examination, receipt of required documentation, verification of identification, and on-site technical inspection.

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Concerning modifications, the Plant Physical Change Program provides for the following requirements: special processes, test, measuring and test equipment, and cleanliness. The work package shall be reviewed by site Nuclear Oversight personnel who have been appropriately trained to ensure that the required special installation procedures are included in the package or properly referenced. Verification of conformance to established requirements shall be performed by individuals or groups who do not have direct responsibility for performing the work being verified. Personnel or groups assigned responsibility for verification of inspection or testing shall be delineated in appropriate implementing documents.

Plant personnel performing inspection, examination, and testing functions which are associated with normal operations of the plant and certain technical reviews normally assigned to the on-site operations organization shall be qualified to ANSI N18.1-1971.

Plant personnel who will be performing inspection, examination, and testing functions which are not associated with normal operations of the plant shall be trained and qualified in accordance with the requirements of Regulatory Guide 1.58, "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel", and 10CFR50.55a, Subsection g, "Inservice Inspection Requirements", which endorse, with specific exceptions, ANSI N45.2.6-1973, "Qualifications of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants", except that QA experience cited for levels I, II, and III shall be interpreted to mean actual experience in carrying out the type of activity being performed. Nuclear Oversight personnel will be qualified to these references with the noted exceptions. Non-plant personnel who perform plant inspections,

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examinations and testing shall be trained and qualified in accordance with the above stated paragraph.

Additionally, this also applies to contract personnel working under the site OQAP. Suitable review and acceptance must be made for qualification to other revisions or other standards the contractor's program may specify. Training of personnel performing activities affecting quality shall be conducted to ensure that suitable proficiency is achieved and maintained.

**11.0 TEST CONTROL**

A preoperational test program was conducted to demonstrate that structures, systems, and components would perform up to quality standards. A continuing operational test program is being conducted in accordance with Technical Specification surveillance requirements to ensure the operability of safeguard and safety-related structures, systems, and components. Implementing documents shall provide for the prerequisites, evaluation, and documentation of these test results.

When required, the Work Order and Plant Physical Change Program shall provide for the testing and evaluation of test results for replacement, repaired, or modified structures, systems, or components.

**12.0 CONTROL OF MEASURING AND TEST EQUIPMENT**

Measuring and test equipment and reference standards (calibration standards) used for measurements, tests and calibration respectively, shall be of the proper range and type and shall be controlled, calibrated and adjusted, and maintained at

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specified intervals or prior to use to assure the necessary accuracy of calibrated devices. The referenced standards used shall have an accuracy range and stability which are adequate to verify that the equipment being calibrated is within required tolerance. The reference standards used shall be adequate for the requirements of the equipment being calibrated, shall be recertified against higher level equipment of closer tolerance, and shall be traceable to nationally recognized standards. The method and interval of calibration for measuring and test equipment and reference standards shall be specified and shall be based on the type of equipment, its characteristics and other conditions affecting calibration. When measuring and testing equipment or reference standards are found to be out of calibration, an evaluation shall be made of previous inspections and test results and acceptability of the items previously inspected.

**13.0 HANDLING, STORAGE, AND SHIPPING**

Implementing documents shall provide a system for material and equipment handled at and shipped from the plant to prevent damage, deterioration or loss. Where necessary, for sensitive or high value items, specific written instructions or procedures will be utilized. Where necessary, special handling tools and equipment will be utilized.

Implementing documents shall provide for special provisions for the control of items which might cause risk to the general public if damage should occur.

Implementing documents shall also provide a system for controlling material during storage to prevent damage, loss, deterioration, or environmental damage. Housekeeping practices shall be controlled to prevent degradation in item quality.

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## 14.0 INSPECTION, TEST, AND OPERATING STATUS

The measures required in these criteria are applied to two general categories, material control and operational control. Inspection, test, and operating status provided by the material control program is implemented through implementing documents which are controlled by responsible organizations. Operational control, including the status of inspections, tests, and operations activities is described in implementing documents which are controlled by the Operations and Outages & Scheduling organizations. All changes in procedures for these categories are reviewed by management. If the need for bypassing of a required inspection, test, or other critical operation occurs, it shall be procedurally controlled and reviewed by management.

### 1. Material Control

A receipt inspection at the plant site shall identify the status of acceptable items and shall provide for the control of uninspected and nonconforming items to ensure use and installation of only correct and acceptable materials. Physical identification shall be used to the maximum extent possible to identify the status of materials inspected. The system shall provide for documentation traceable to the item and segregation and disposition of nonconforming items to preclude misuse.

### 2. Operational Control

The work control program shall include provisions for taking equipment out of service, identification of that equipment, and precautions or prerequisites for returning that equipment to service. The work order and supplemental documents shall be reviewed by Nuclear Oversight personnel to ensure that

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special processes, inspection (hold and witness points) and testing requirements are adequately specified. They are also reviewed by operations personnel to determine the effect on plant operations, the proper tagging out of service of equipment, and the protection of personnel and equipment.

## **15.0 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS**

When a nonconforming item is identified during a receipt inspection, the condition shall be documented in accordance with approved implementing documents and the item identified or segregated to preclude misuse, further processing, or installation pending disposition. Material nonconformances shall be controlled and evaluated by cognizant plant personnel for the determination of the disposition of nonconforming items. Material nonconformances and dispositions shall be submitted to the responsible organization for implementation of corrective action.

Provisions shall be established to ensure that items dispositioned as "repair" or "rework" are reinspected and require documentation verifying the acceptability of the item prior to release for use.

## **16.0 CORRECTIVE ACTION**

Conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective materials and equipment (post-receipt inspection), and nonconformances shall be documented and reported in accordance with approved procedures. These reports provide the mechanism for all personnel to notify management of conditions adverse to quality. Measures shall be provided for the prompt processing of these reports to ensure expeditious investigation, evaluation, and implementation of corrective action. For situations determined to be significantly

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adverse to quality, investigations shall not only provide for identifying and correcting the condition, but also for determining the cause of the condition to ensure that corrective action is taken to preclude its recurrence.

Measures shall be established to ensure that reports of conditions adverse to quality are promptly prepared and reviewed for events, which may be potentially reportable to the NRC. These reports shall be evaluated by management for safety implications and Technical Specifications violations. The system shall provide for determination of corrective action to be taken, implementation of the corrective action, and final close out.

Measures shall be established in appropriate implementing documents to document and control independent assessment (audit) findings. These measures shall include a description of the unacceptable condition, corrective action to be taken, response time, verification of implementation of appropriate corrective action, and close out of the deficiency generated as a result of independent assessments. Corrective action taken for these findings shall be reviewed and verified. Disagreement between Nuclear Oversight and the assessed organization regarding corrective action shall be pursued through responsible management with the final authority resting with the Site Vice President.

Technical deficiencies and recommendations generated during technical reviews shall be documented with the report. Technical deficiencies and recommendations shall be submitted to the appropriate Manager for disposition as deemed necessary.

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## 17.0 QUALITY ASSURANCE RECORDS

Implementing documents shall be prepared to control records that are generated during the operation of the Kewaunee Nuclear Power Plant. These implementing documents shall identify the types of records that are to be controlled including requirements for storage.

Records shall be maintained in the KNPP Records Vault, the main records storage facility, or another facility satisfying the permanent record storage requirements of the QA program. Frequently used records, not stored in the KNPP Records Vault shall be maintained in accordance with procedures, which provide for proper control and protection of the records. Records may be maintained using microfilm, optical disk, or other approved technology provided appropriate quality control provisions have been established in the controlling procedures.

Records shall be kept for the prescribed periods of time in accordance with the requirements of Technical Specifications or Regulations. Implementing documents shall provide for a system that permits the retrieval of information in a reasonable amount of time.

## 18.0 AUDITS

Independent assessments (audits) shall be conducted utilizing performance-based methods in accordance with appropriate implementing documents to verify that the requirements of the QA program are being implemented. Independent assessments shall be conducted on, but not limited to, power plant operating and maintenance activities, engineering activities, fuel management activities,

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procurement and material control activities, and supplier activities. A comprehensive system of planned and documented independent assessments shall be carried out to verify compliance with all aspects of the administrative controls and quality assurance program. Independent assessments of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to assure that an independent assessment of all safety-related functions is completed within a period of two years. An independent assessment program has been developed to assess the implementation of the Technical Specifications during planned and emergent performance based assessments. These assessments shall be performed by experienced personnel trained, in accordance with ANSI N45.2.23-1978, and independent of any direct responsibility of the activity being assessed.

Preparation of assessments, documentation of findings, and issuance of assessment reports shall be described in implementing documents. Responsible personnel of the assessed activity shall review the results and provide corrective actions. Follow-up action shall be provided to ensure that corrective action is implemented and adequate.

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**APPENDIX A**

**ANSI N18.7-1976 EXCEPTIONS, INTERPRETATIONS, QUALIFICATIONS**

**General**

ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants" is adopted to provide a basis for establishing an operational quality assurance program that meets the requirements of 10CFR50 Appendix B. This standard provides an acceptable means to satisfy the criteria of 10CFR50 Appendix B, but does not limit the use of alternate means to ensure safe operation of the plant. In this regard, those portions of this standard to which exceptions, interpretations and/or qualifications are taken are listed below.

Standards in general present objectives to be met with the method of implementation left general enough to provide for various interpretations for implementation. In the review of the program in accordance with the adoption of these new standards, many changes in implementation have been made. Where questions of interpretation were raised a conscientious interpretation has been formalized with the Nuclear Oversight staff. Wherever future questions of interpretation arise they will be decided in a similar manner with continued disagreement being brought before corporate management for resolution.

When a short term or one time contradiction to the program is discovered, a non-conformance action will be taken within the Nuclear Oversight organization to ensure a conscientious effort to maintain a quality level equivalent to the safety significance of the activity involved. When a long term or permanent contradiction to the program exists, a program change shall be implemented providing the same level of review as the adoption of this program, and the change will be submitted to the NRC.

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Finally, wherever Technical Specifications overlap or contend with the administrative controls provided for in this program, the Technical Specifications take precedence.

## **PARTICULAR EXCEPTIONS AND QUALIFICATIONS**

### **ANSI N18.7-1976**

#### **Section**

- 3.1** Administrative controls shall be established necessary to comply with this standard as adopted, with the exceptions, interpretations, and qualifications addressed in this transmittal.
- 5.2.2** This section requires that temporary changes, which clearly do not change the intent of approved procedures, shall as a minimum be approved by two members of the plant staff knowledgeable in the areas affected by the procedures. At least one of these individuals shall be the supervisor in charge of the shift and hold a senior operator license on the unit affected. Kewaunee Technical Specification 6.8.b does not require the licensed senior reactor operator to be the individual in charge of the shift.
- 5.2.7.2** This paragraph requires that design activities associated with modification of safety-related structures, systems, and components shall be accomplished in accordance with ANSI N45.2.11-1974. We will commit to apply this standard to those design activities which we deem are comparable in nature and extent to similar construction related activities, the provisions of which shall be employed as applicable to the degree of importance to safety for the design project under consideration. We shall also adopt the Regulatory Position of Regulatory Guide 1.64, Rev. 2, June 1976, as requested with an exception to position C.2. We will

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follow our existing practice that design verification should not be performed by the originator's supervisor, except where expertise is not available other than the supervisor immediately responsible for the design.

**5.2.9** This section requires that procedures be developed to supplement features and physical barriers designed to control access to the plant and, as appropriate, to vital areas within the plant. Plant security and visitor control measures are implemented in accordance with the Kewaunee Security Manual, required by 10 CFR 50.34(c).

**5.2.12** This section specifies that ANSI N45.2.9-1974, "Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants", shall be used for management of plant records during the operational phase. Compliance with the provisions of this standard and the Regulatory Position of Regulatory Guide 1.88, Rev. 2, October 1976, shall be deemed applicable to the nature and scope of the work being performed and the importance of the item or service involved with the exceptions noted below.

**5.2.15** This section requires that plant procedures, which govern safety-related activities, shall be reviewed 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. KNPP has alternate programs in place that make a biennial review process unnecessarily duplicative. These alternate programs ensure procedures are periodically reviewed and maintained current when pertinent source material is revised, plant physical changes are made, and/or any deficiencies occur. KNPP will also implement measures specifying that infrequently scheduled plant procedures that have not been used or reviewed for two years should be reviewed before use. Due to the significance of the Integrated Plant Emergency Operating

Procedures (IPEOP's), the biennial review of the IPEOP's will be continued. Alternate programs in place include the following:

1. Technical Specification revision process

This process includes a review of affected plant procedures upon the approval of a Technical Specification Amendment and subsequent revisions as appropriate.

2. Physical Change Program

Affected site organizations are notified of modifications and are requested to review affected plant procedures. Revisions to procedures are verified as part of the Physical Change closeout process.

3. Various Self-Assessment Programs

During self-assessment activities, procedures may be identified that contain significant discrepancies. Revisions are made as appropriate.

4. Corrective Action Program

Any procedures identified as being in need of revision during the corrective action evaluation process are revised before the corrective action is closed out.

5. Quality Assurance Program

At least every two years, a surveillance will be performed whereby randomly selected safety-related procedures would be checked for added assurance of timely revision of procedures.

6. Operating Experience Assessment Program

During operating experience assessment activities, procedures may be identified that contain significant discrepancies or require change. Revisions are made as appropriate. Significant changes to vendor manuals are evaluated as part of this program.

**ANSI N45.2.9-1974**

**Section**

**4.3 & 4.4 Concerning Receipt Control.**

The Records Management Group has been designated as the group responsible for receiving and storing records. This staff does not control which records are sent to them, however, there is a record index system identifying which records are under the control of the QA Program. We have assigned responsibility for assuring QA records are retained in accordance with QA Program commitments to the various department heads or process owners. Also there is no log of incoming records. However, the previously mentioned index is kept up to date and serves as a list of records received and retained. We have a procedure, which partially covers the receipt control of records but none specifically for this action. We do not plan at this time to implement any further controls on the receipt of records.

**ANSI N45.2.9-1974**

**Section**

**5.6 Concerning Permanent and Temporary Storage Facilities.**

Criteria specified in this paragraph for those records stored in single record storage facilities are met; however, the use of temporary storage facilities, the definition of a

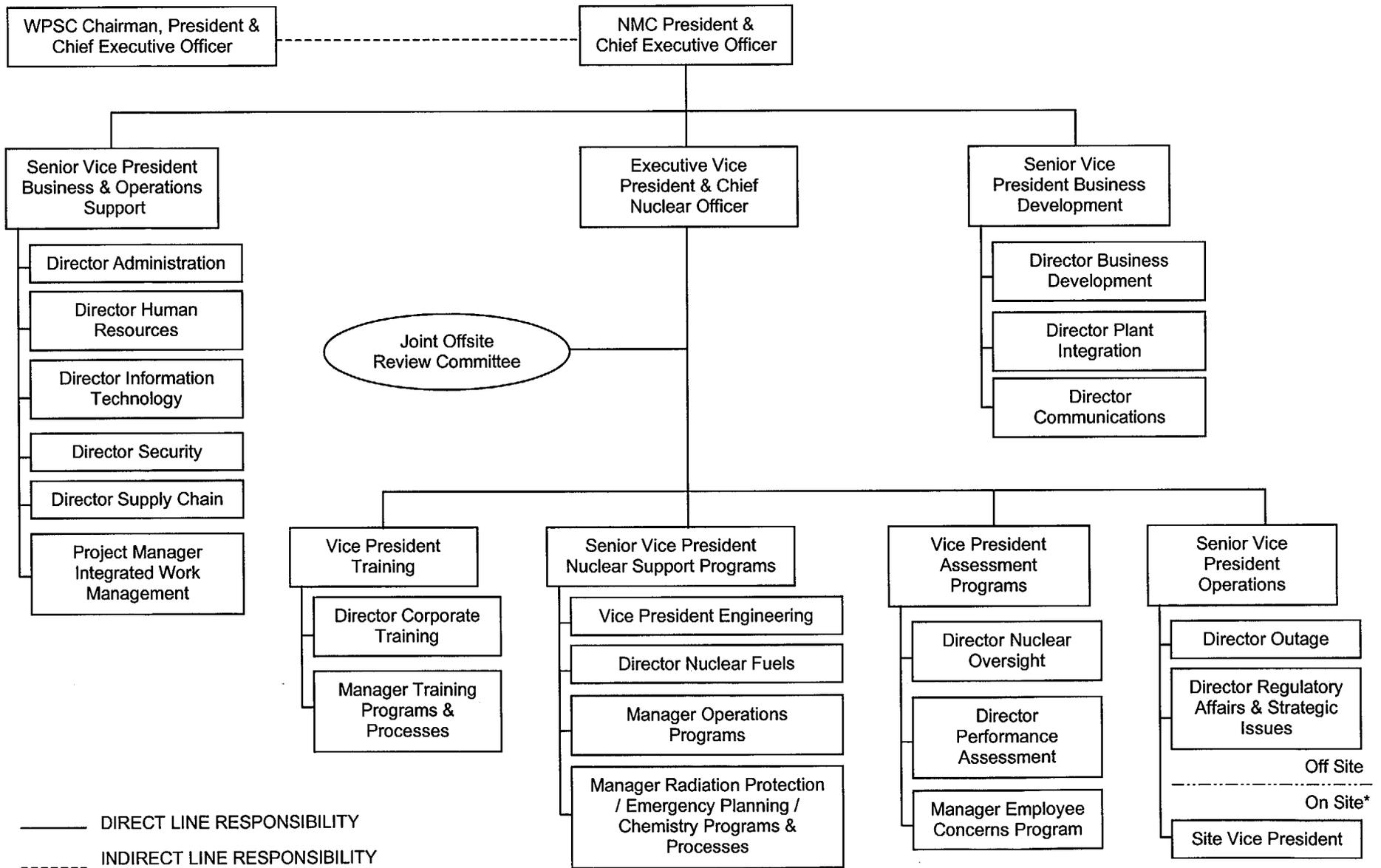
<p>Kewaunee Nuclear Power Plant <i>Operated by</i> <i>Nuclear Management Company, LLC</i></p> <p><b>Operational Quality Assurance Program Description</b></p>	<p> Date: 06/05/02 Rev. 22 Page 43 of 46</p>
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working QA document and the transport of QA records to permanent storage differ.

Several in-house generated QA documents/records are maintained in working files, e.g., OSRC Meeting Minutes, training records and radiological survey data. These documents/records which we feel are working documents until no longer used on a routine basis are kept in locked, fire-proof file cabinets and are periodically transferred to the permanent storage facilities. Duplication or filing in the permanent storage facility would be unacceptable due to the quantity and frequent use of these documents.

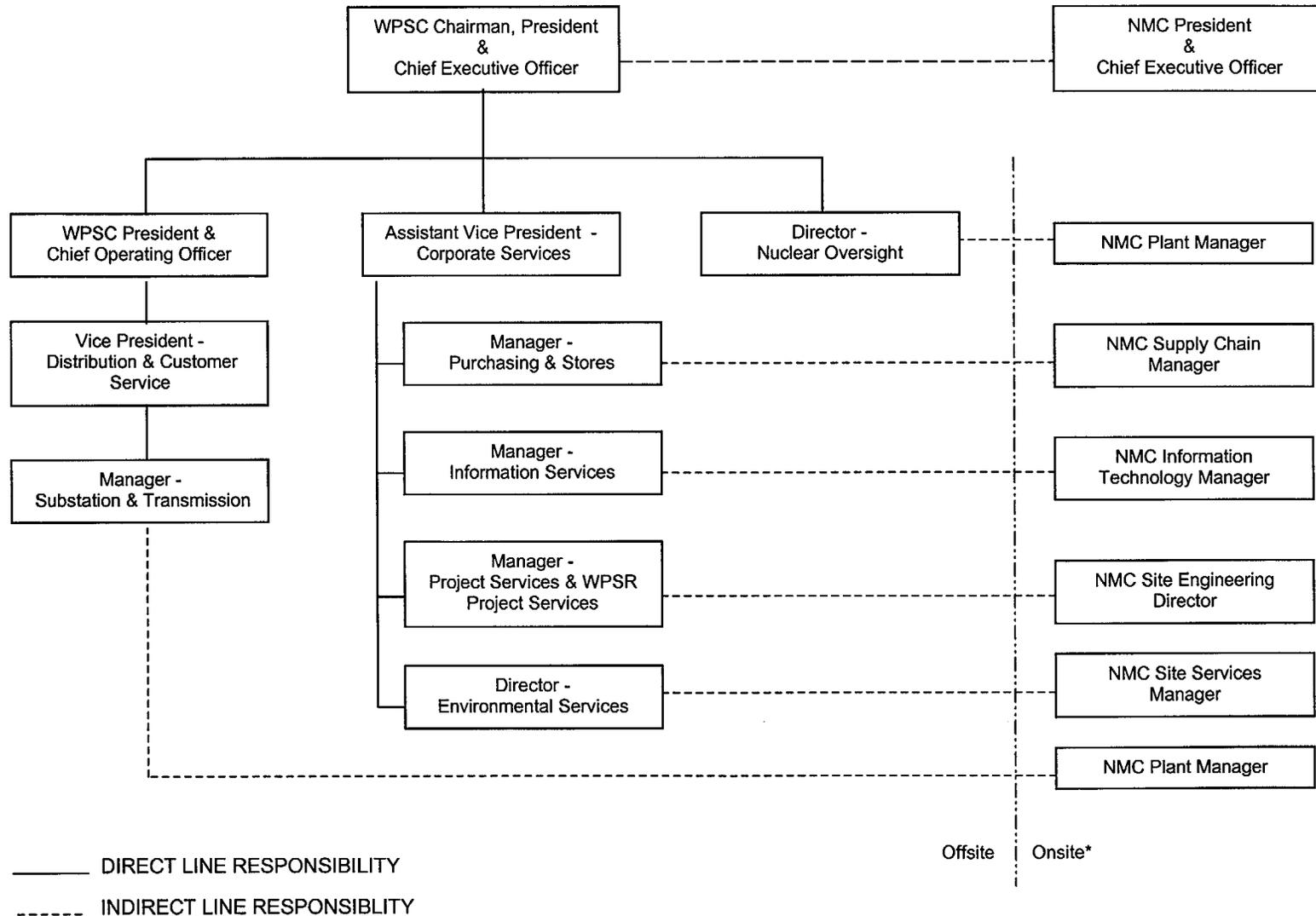
We find our handling of these documents acceptable due to the relative short duration of filing in temporary quarters and relative insensitivity of these documents to the safety of the plant. Finally, we do not have a courier service to immediately transfer a QA record just completed to the permanent storage facilities. Some records are transferred by personal delivery and others through the routine in-company mail service. At this time we do not plan to implement any further controls on transferring documents to the permanent record storage facilities.

QQAPD Section No. 1 (Rev. 22)  
 Figure 1 - NMC OFFSITE FUNCTIONAL QUALITY ASSURANCE ORGANIZATION



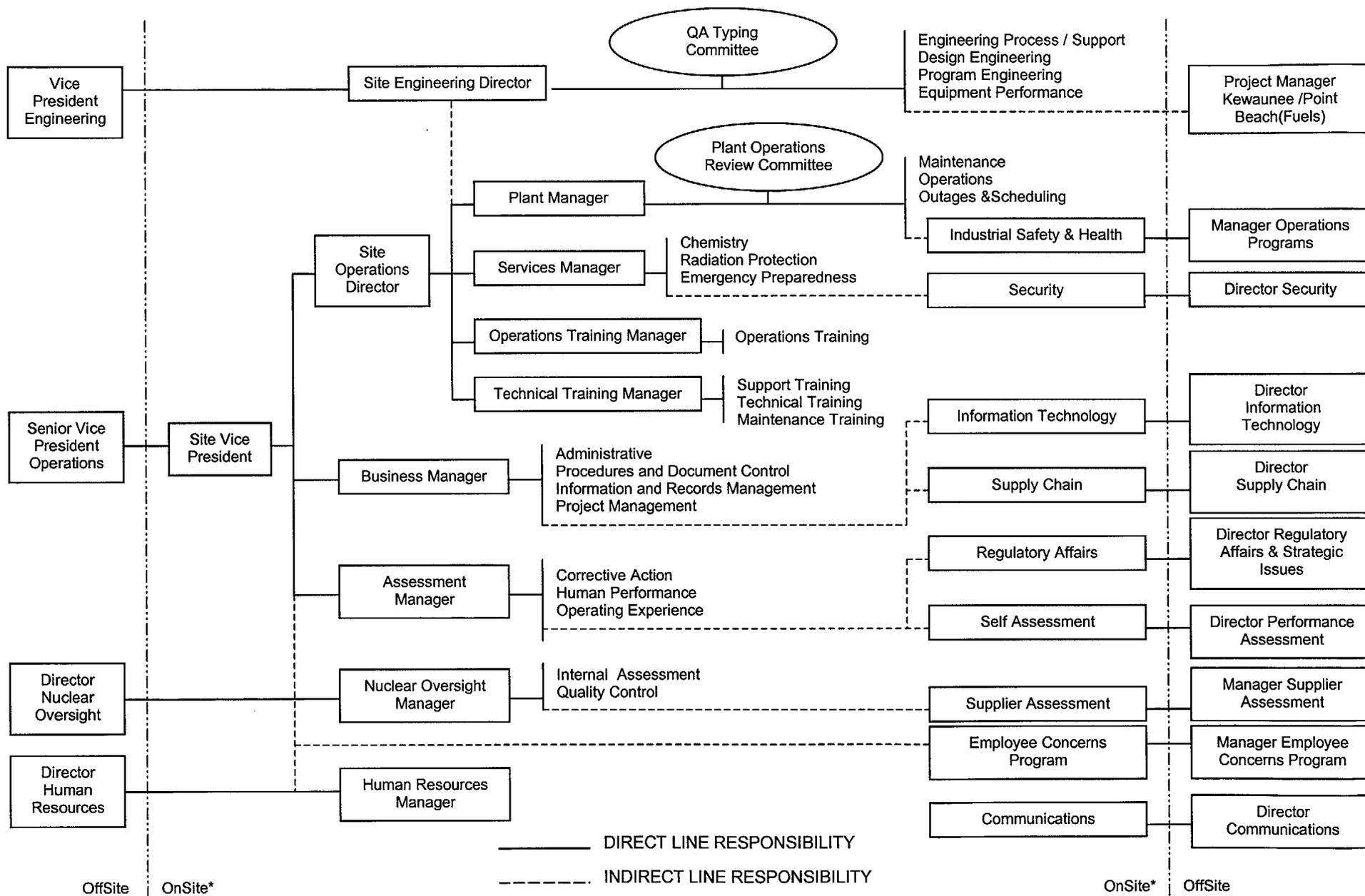
\* Located at Kewaunee or Point Beach Nuclear Power Plant Sites

Figure 2 - Wpsc OFFSITE FUNCTIONAL QUALITY ASSURANCE ORGANIZATION



\* Located at Kewaunee or Point Beach Nuclear Power Plant Sites

QQAPD Section No. 1 (Rev. 22)  
 Figure 3 - NMC ONSITE FUNCTIONAL QUALITY ASSURANCE ORGANIZATION



———— DIRECT LINE RESPONSIBILITY  
 - - - - - INDIRECT LINE RESPONSIBILITY

\* Located at Kewaunee or Point Beach Nuclear Power Plant

Docket 50-305  
NRC-02-046  
June 5, 2002

Attachment 2

to

Letter from M. E. Warner (NMC) to NRC Document Control Desk

dated

June 5, 2002

Description of Changes

to the

Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 22

The following describes the changes made to the Operational Quality Assurance Program Description (OQAPD) for the Kewaunee Nuclear Power Plant. Included are the reasons for the changes and the bases for the changes not involving a reduction in Quality Assurance Program commitments as defined in 10 CFR 50.54(a)(3).

Page and paragraph numbers referenced in the following refer to the OQAPD copy without strikeouts.

<p><b>Page 2, ¶ #2</b></p>	<p><b>IDENTIFICATION OF CHANGE:</b> <b>Change</b> "... <u>Nuclear Management Company (Figure 1)</u>" to "... <u>Nuclear Management Company Offsite (Figure 1)</u>"</p>
<p><b>Page 2, ¶ 2</b></p>	<p><b>Change</b> "The President &amp; CEO provides guidance with regards to company quality assurance program." to "Lines of authority and responsibility are established under the direction of the President &amp; CEO for implementation of the Quality Assurance Program."</p>
	<p><b>REASON FOR CHANGE:</b> Editorial change to reflect the organization's physical location and correspond with the title of Figure 1. Editorial clarifications in describing the role of the NMC President &amp; CEO in the implementation of the OQAP as well as delegated organizational authority and responsibility.</p> <p><b>BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:</b> The change describes organizational responsibility and authority that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi).</p>
<p><b>Page 3, ¶ 1</b></p>	<p><b>IDENTIFICATION OF CHANGE:</b> <b>Add</b> " The President &amp; CEO has also delegated to this position the overall responsibility and authority for the implementation of the NMC Quality Assurance Program requirements and the activities of the Offsite Review Committee. "</p>
<p><b>Page 3, ¶ 1</b></p>	<p><b>Change</b> "Reporting to the Executive Vice President &amp; Chief Nuclear Officer are the Senior Vice President Nuclear Operations, Senior Vice President Nuclear Support Programs, and Senior Vice President Assessment Programs." to "Reporting to the Executive Vice President &amp; Chief Nuclear Officer are the Senior Vice President Operations, Senior Vice President Nuclear Support Programs, Vice President Assessment Programs, and Vice President Training."</p>
	<p><b>REASON FOR CHANGE:</b> Update the organizational authority and responsibilities to reflect the direction established by the President &amp; CEO, including the current organizational titles and</p>

reporting relationships.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes to reflect the current positional titles as permitted by 10 CFR 50.54(a)(3).

Page 3, ¶ 2

**IDENTIFICATION OF CHANGE:**

Change “Senior Vice President – Nuclear Operations” to “Senior Vice President – Operations”

Page 3, ¶ 2

Change “Follows directions set by the CNO, President, and Board of Directors. Provides direction and structure for the operating units. Participates in developing policy and strategic plans.” to “This position is responsible for implementation of directions set by the CNO, President, and Board of Directors, providing direction and structure for the operating units, and participating in the development of policies and strategic plans affecting nuclear operations.”

Page 3, ¶ 2

Add “Reporting to this position is the Site Vice President, Director – Regulatory Affairs & Strategic Issues and the Director – Outage. Respectively, these positions are responsible for the overall leadership of the site organization, regulatory and licensing services, including license renewal programs, and focused outage management.”

**REASON FOR CHANGE:**

Update the organizational authority and responsibilities to reflect the direction established by the President & CEO, current organizational titles and reporting relationships and editorial changes.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes to reflect the current title as permitted by 10 CFR 50.54(a)(3).

Page 3, ¶ 3 –  
Page 4, ¶ 1

**IDENTIFICATION OF CHANGE:**

Change “This position, along with vice president support is responsible for Kewaunee Nuclear Power Plant nuclear fuel design, high level waste management, security, procurement, warehousing, and emergency planning.” to “This position, along with Vice President, Director, and Manager support, is responsible for Kewaunee Nuclear Power Plant nuclear fuel design and supply, engineering services and programs, and industrial safety and health, radiation protection,

chemistry, and emergency preparedness programs.”

**REASON FOR CHANGE:**

Updates to reflect the current organizational titles, authorities and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes to reflect the current titles, format and level of detail as permitted by 10 CFR 50.54(a)(3).

Page 4, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** “Senior Vice President Nuclear Assessment Programs” to “Vice President - Assessment Programs”

Page 4, ¶ 2

**Change** “... the overall quality assurance, oversight and assessment activities.” to “... the overall NMC Quality Assurance Program development and maintenance, oversight and assessment activities.”

Page 4, ¶ 2

**Change** “Under this Senior Vice President, the Director Nuclear Oversight has primary responsibility for QA Program Description, corporate directives, internal audit program, supplier qualification program, quality control program services for applicable sites, off-site review...” to “This position, along with Director and Manager support is responsible for the internal assessment (audit) program, supplier assessment (qualification) program, quality control program, performance assessment program, self assessment program, corrective action program, off-site review...”

**REASON FOR CHANGE:**

Updates to the organizational titles, authorities and responsibilities and editorial changes. The reference to corporate directives was deleted because these are assigned responsibility to the designated corporate vice president, director or manager, not specifically to this position. The term “assessment” was added as it is used by the company in place of the word audit and is considered an editorial change.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to organizational titles and responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes to reflect the current terms used for the facility as permitted by 10 CFR 50.54(a)(3).

- Page 4, ¶ 3**      **IDENTIFICATION OF CHANGE:**  
**Add** “Vice President – Training” and “This position, along with Director and Manager support is responsible for the development of corporate training programs and processes, including leadership development.”
- Page 4, ¶ 3**      **Delete** “Vice President - Engineering” and its associated description.
- Page 4, ¶ 3**      **Delete** “Director - Regulatory Services & Strategic Issues” and its associated description.

**REASON FOR CHANGE:**

The addition of the Vice President –Training is to reflect current NMC organizational titles and responsibilities. The deletion of the Vice President – Engineering position and description is to remove unnecessary detail, as these functions are described under the Senior Vice President – Nuclear Support Programs position on page 3. The deletion of the Director - Regulatory Services & Strategic Issues position and description is to remove unnecessary detail, as these functions are described under the Senior Vice President – Operations position on page 3.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organization that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi) and editorial changes as permitted by 10 CFR 50.54(a)(3).

- Page 4, ¶ 4**      **IDENTIFICATION OF CHANGE:**  
**Change** “Vice President – Business Support” to “Senior Vice President – Business & Operations Support”
- Page 4, ¶ 4**      **Change** “ This position is responsible for administration, human resources and information technology services.” to “This position is responsible for the areas of administration, human resources, information technology, security, supply chain, and integrated work management.”
- Page 4, ¶ 4**      **Delete** “Vice President – Treasurer & CFO” and its associated description.
- Page 4, ¶ 5**      **Add** “Senior Vice President – Business Development” and “ This position is responsible for development and implementation of NMC business growth strategies, business integration of NMC sites and corporate communications.

Corporate communications provides support in the implementation of the site Emergency Plan.”

**REASON FOR CHANGE:**

Updates to reflect current NMC organizational titles and responsibilities. The deletion of the Vice President – Treasurer & CFO from the text and Figure 1 is to remove unnecessary detail, as this position does not have any site OQAP implementing responsibilities. The insertion of the Senior Vice President – Business & Operations Support is to reflect a position that has related any site OQAP implementing responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organization that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi) and editorial changes as permitted by 10 CFR 50.54(a)(3).

Page 5, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Change** “Senior Vice President – Development” to “Director – Nuclear Oversight”

Page 5, ¶ 1

**Change** “This position reports directly to the Chairman, President and Chief Executive Officer of WPS Resources, who is also the WPSC Chairman and Chief Executive Officer for nuclear responsibilities. This position is responsible for monitoring...” to “This position reports directly to the Chairman, President and Chief Executive Officer of Wisconsin Public Service Corporation (WPSC) and is responsible for monitoring...”

**REASON FOR CHANGE:**

Updates to the organizational titles, authorities and responsibilities and editorial changes to remove unnecessary detail regarding WPSR titles.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 5, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** “Manager – Corporate Services” to “Assistant Vice President – Corporate Services”

Page 5, ¶ 2

**Add** “This position reports to the WPSC Chairman and Chief Executive Officer for nuclear responsibilities.”

- Page 5, ¶ 2**      **Change** "... performed by the Purchasing and Stores Group Project & Facility Services, Information Technology, and Environmental Services, involving KNPP and ensuring support is available for special projects involving KNPP." to "... performed by the Purchasing and Stores, Project Services, Information Technology, and Environmental Services organizations."
- Page 5, ¶ 2**      **Change** "The Purchasing and Stores Group is responsible..." to "Purchasing and Stores is responsible..."
- Page 5, ¶ 2**      **Change** "The Project & Facility Services Group is responsible for..." to "Project Services is responsible..."
- Page 5, ¶ 2**      **Change** "... for KNPP, as requested" to "... for KNPP physical facilities, as requested."
- Page 5, ¶ 2**      **Delete** "They also have responsibility for preparation, review, revision and issue of appropriate directives controlling engineering activities performed primarily by this group."
- Page 5, ¶ 2**      **Change** "The Information Technology Services is responsible ..." to "Information Technology Services is responsible ..."

**REASON FOR CHANGE:**

Updates to the organizational titles, authorities, descriptions of responsibilities, and editorial changes. The responsibilities for review and approval of engineering documents used to implement activities at KNPP resides within NMC.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and descriptions of responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes as permitted by 10 CFR 50.54(a)(3).

**Page 5, ¶ 3**

**IDENTIFICATION OF CHANGE:**

**Change** "...Vice President Transmission and Engineering..." to "...Vice President Distribution and Customer Service..."

**REASON FOR CHANGE:**

Updates to the organizational titles.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and description that continue to meet the requisite criteria for authority and organizational freedom in implementing

quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes as permitted by 10 CFR 50.54(a)(3).

Page 6, ¶ #4

**IDENTIFICATION OF CHANGE:**

**Change “... Nuclear Management Company (Figure 3)” to “... Nuclear Management Company Onsite (Figure 3)”**

Page 6, ¶ 2

**Change “KPB Site Vice President” to “Site Vice President”**

Page 6, ¶ 2

**Change “This position is responsible for all plant activities associated with safe and reliable operation, maintenance, engineering, assessment and technical support. He is also responsible for the activities of the site business group associated with budgeting, purchasing, strategic planning and information management.” to “This position is responsible for the overall leadership of the site organizations and activities associated with safe and reliable operation of the Kewaunee Nuclear Power Plant and implementation of the OQAP requirements. Reporting to this position are the Site Operations Director, Business Manager and Assessment Manager. Indirectly reporting to this position are the areas of Nuclear Oversight, Human Resources and Employee Concerns Program.”**

Page 6, ¶ 2

Page 6, ¶ 2

**Change “The KPB Site Vice President position maintains...” to “This position maintains...”**

**Change “...as described below to the groups shown in Figure 3.” to “as described in the following and as shown in Figure 3.”**

**REASON FOR CHANGE:**

Editorial change to reflect the organization’s physical location and correspond with the title of Figure 3. Updates to the organizational titles, authorities, and descriptions of responsibilities and editorial changes.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes as permitted by 10 CFR 50.54(a)(3).

Page 6, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Add “Site Operations Director” and “ This position is responsible to the Site Vice President for providing a focused management direction of operational issues associated with the Kewaunee Nuclear Power Plant. Reporting directly to this position are the Plant Manager, Services Manager and Training Managers. Indirect reports to this position include the Site Engineering Director.”**

**REASON FOR CHANGE:**

Updates to the organizational titles, authorities, and descriptions of responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 7, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Change** "... to the KPB Site Vice President..." to "... to the Site Operations Director..."

Page 7, ¶ 1

**Add** "... and is responsible for the functions of the Plant Operations Review Committee."

Page 7, ¶ 1

**Change** "... verification of implementation of nuclear administrative directives affecting quality for his areas of responsibility" to "... verification of implementation of activities affecting quality for designated areas of responsibility."

Page 7, ¶ 1

**Change** "... maintenance, operations, planning and scheduling, as described below:" to "...maintenance, operations, outage and scheduling, and indirectly the industrial safety and health program, as described below:"

**REASON FOR CHANGE:**

Updates to the organizational titles, authorities, and descriptions of responsibilities, deletion of the reference to nuclear administrative directives to broaden the context of responsibility and an editorial change to make the sentence gender neutral.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes as permitted by 10 CFR 50.54(a)(3).

Page 7, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** "... is responsible for maintenance of plant equipment and maintenance engineering activities." to "... is responsible for implementation of the corrective and preventative maintenance programs."

**REASON FOR CHANGE:**

Updates to the organizational responsibilities. Maintenance engineering is part of

the engineering organization.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 7, ¶ 3

**IDENTIFICATION OF CHANGE:**

Add "... and shift technical advisors. Operations maintains the authority and responsibility for system status control and equipment operation during all modes of plant operation and under emergency conditions in accordance with the site license and Technical Specifications."

**REASON FOR CHANGE:**

Updates to the organizational structure to reflect the incorporation of the shift technical advisors within the operations organization and added an expanded description of operational responsibilities in accordance with current commitments.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 7, ¶ 4

**IDENTIFICATION OF CHANGE:**

Change "Planning and Scheduling" to "Outages and Scheduling"

Page 7, ¶ 4

Change "... work request system, and planning and scheduling for routine maintenance activities." to "...work control system, and planning and scheduling for routine and corrective maintenance activities."

**REASON FOR CHANGE:**

Updates to organizational titles and responsibilities and reference to the work control system

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes as permitted by 10 CFR 50.54(a)(3).

Page 7, ¶ 5

**IDENTIFICATION OF CHANGE:**

Add "Industrial Safety and Health – is responsible for assisting in establishing and monitoring the implementation of industrial safety and health policies at the site for

the protection of workers from industrial hazards. This area reports to the NMC Manager Operations Programs”

**REASON FOR CHANGE:**

Updates to the organizational responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

**IDENTIFICATION OF CHANGE:**

Page 8, ¶ 1

**Change** “KPB Site Engineering Manager” to “Site Engineering Director”

Page 8, ¶ 1

**Change** “... supervision of the Engineering and Technical Support Group. The responsibilities of this position are centered around providing engineering support to the Kewaunee...” to “... supervision of the site Engineering organization and functions of the Quality Assurance Typing Committee. This position is responsible to the Vice President Engineering and indirectly to the Director Site Operations. This position ensures that engineering support is provided to the Kewaunee...”

Page 8, ¶ 1

**Change** “... support the plant, providing...” to “... support the plant, and providing...”

Page 8, ¶ 1

**Add** “Reporting indirectly through this position for nuclear fuel activities is the Project Manager Kewaunee/Point Beach, who reports through the NMC Director Nuclear Fuels.”

Page 8, ¶ 1

**Change** “... nuclear administrative directives affecting quality for his area of responsibility.” to “... activities affecting quality for designated areas of responsibility.”

**REASON FOR CHANGE:**

Update title and responsibilities, editorial change to sentence structure, deletion of the reference to nuclear administrative directives to broaden the context of responsibility and an editorial change to make the sentence gender neutral.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

**IDENTIFICATION OF CHANGE:**

Page 8, ¶ 2

Delete "Physical Change" and associated description

Page 8, ¶ 2

Add "Design Engineering – is the primary design organization for the site, responsible for the preparation and implementation of permanent and temporary design changes and plant modifications, including when required, supporting design analysis, calculations or evaluations. Examples of design analysis activities include piping support and stress analysis, electrical distribution and protection coordination, equipment set point analysis, and component seismic analysis. Personnel performing analysis are responsible for assuring that selected analytical software products comply with QA criteria for safety-related software controls where applicable. This organization is also responsible for drawing control and the development and maintenance of design specifications and standards."

**REASON FOR CHANGE:**

Updates to the organizational title and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 9, ¶ 1

**IDENTIFICATION OF CHANGE:**

Change "Engineering Programs" to "Program Engineering"

Page 9, ¶ 1

Change " All program areas are responsible for providing the specialist for that program." to " is responsible for administration and management of site engineering programs. Engineering program functional areas are responsible for providing the program specialist for the applicable program."

Page 9, ¶ 2

Change " ... supplementing the program specialists with Engineering & Technical Support staff or other nuclear staff." to " ... supplementing the program engineering staff with other NMC staff."

Page 9, ¶ 1

Change "... areas are listed below" to "... areas include:

**REASON FOR CHANGE:**

Updates to the organizational titles and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and descriptions that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 9, List

**IDENTIFICATION OF CHANGE:**

**Change** “Fire Protection, ISI Program, IST/Check Valve Program, Heat Exchanger Performance Program, Maintenance Rule Program, Reactor Engineering Program, Steam Generator Program, STA Program, and Turbine Program” to “Containment Leak Rate Testing, Environmental Qualification, Flow Accelerated Corrosion, Fire Protection, In-Service Inspection, In-Service Testing, Heat Exchanger Performance, Non-Destructive Examination, Probabilistic Risk Assessment, Reactor Engineering, Reactor Pressure Vessel Integrity, and USAR Safety Analysis”

**REASON FOR CHANGE:**

Updates to the organizational responsibilities and editorial changes. Deleted steam generator program reference as it is combined within the heat exchanger performance program. Deleted STA program reference to reflect transfer of responsibility to the Operations organization. Deleted Turbine Program reference to reflect transfer of responsibility to the Equipment Performance Engineering organization.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational responsibilities and descriptions that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 9, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Delete** “Engineering and Technical Support (E&TS) Group” and its associated description.

Page 9, ¶ 3

**Add** “Equipment Performance Engineering – is responsible for monitoring and improving the performance of plant equipment. Functional responsibilities include system and component engineering, maintenance engineering, preventative maintenance optimization and predictive maintenance technology application. This organization is also responsible for the implementation and management of the maintenance rule program.”

Page 9, ¶ 3 -  
Page 10, ¶ 1

**Add** “Engineering Process / Support – is responsible for providing process support of the engineering department activities. Functional responsibilities include performance and coordination of corrective action program and self-assessments within the engineering department, planning and scheduling of engineering interfaces with plant activities and the development and monitoring of department performance.”

Page 10, ¶ 1

**Delete** “Engineering and Technical Support (E&TS) Group” and its associated description.

Page 10, ¶ 1

Delete "Analytical Engineering" and its associated description.

**REASON FOR CHANGE:**

Updates to the organizational titles and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 10, ¶ 2

**IDENTIFICATION OF CHANGE:**

Change "KPB Site Services Manager" to "Services Manager"

Page 10, ¶

Change "... is responsible for plant activities associated with Chemistry, Health Physics, Industrial Safety and Nuclear Emergency Preparedness." to "... is responsible to the Director Site Operations for plant activities associated with Chemistry, Radiation Protection and Emergency Preparedness. Indirect responsibility also includes site Security activities."

Page 10, ¶ 2

Change "... implementation of nuclear administrative directives affecting quality for his area of responsibility." to "... implementation of activities affecting quality for designated areas of responsibility."

**REASON FOR CHANGE:**

Update titles and responsibilities, deletion of the reference to nuclear administrative directives to broaden the context of responsibility and an editorial change to make the sentence gender neutral.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational titles and description that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and editorial changes as permitted by 10 CFR 50.54(a)(3).

Page 10, ¶ 3

**IDENTIFICATION OF CHANGE:**

Change "Plant Radiation Protection" to "Radiation Protection"

Page 10, ¶ 3

Change "... is responsible for radiation protection, plant health physics activities, and Radiological Environmental Monitoring Programs." to "... is responsible for site radiation protection and health physics activities, radioactive waste processing, off site dose calculation and radiological environmental monitoring programs.

**REASON FOR CHANGE:**

Updates to the organizational titles and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the titles and description of organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 10, ¶ 4

**IDENTIFICATION OF CHANGE:**

Change “ Plant Radiochemistry – is responsible for plant chemistry activities.” to “Chemistry – is responsible for site chemistry activities, including process control monitoring of plant systems and environmental monitoring of waste discharges from the site”

**REASON FOR CHANGE:**

Updates to the organizational titles and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the titles and description of organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 10, ¶ 4

**IDENTIFICATION OF CHANGE:**

Delete paragraph “ Industrial Safety”

**REASON FOR CHANGE:**

Updated to reflect change in organizational structure. This position reports indirectly to the Plant Manager as described on page 7.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational structure that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 10, ¶ 5

**IDENTIFICATION OF CHANGE:**

Change “Nuclear Emergency Preparedness” to “Emergency Preparedness”

Page 10, ¶ 5

Change “...defined in the appropriate directives and implementing procedures.” to

“... defined in implementing documents.”

**REASON FOR CHANGE:**

Updated to reflect organizational title and replaced specific terms for directives and implementing procedures with generic terms to incorporate within scope additional documents, which are used to implement the program.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes are administrative and editorial clarifications only as permitted by 10 CFR 50.54(a)(3).

Page 10, ¶ 6 -  
Page 11, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Add** “Security – is responsible for plant physical security, access authorization and fitness for duty programs. Specific responsibilities and duties are defined in the appropriate implementing documents. The Security organization reports directly to the NMC Director Security.”

**REASON FOR CHANGE:**

Description relocated to this section to reflect change in organization structure and updated to reflect additional responsibilities. Also replaced specific terms for directives and implementing procedures with generic term “implementing documents” to incorporate within scope additional documents, which are used to implement the program.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes are administrative and editorial clarifications only as permitted by 10 CFR 50.54(a)(3).

Page 11, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Add** “Training Managers” and “Under the direction of the Operations and Technical Training Managers, training has been delegated the responsibility to develop, maintain, and provide employee training that meets the needs of the Kewaunee Nuclear Power Plant (KNPP). The Training organization is responsible for the accredited training programs as described in National Academy of Nuclear Training documents. Specific responsibilities and duties for the various training activities are defined in the appropriate implementing documents.”

**REASON FOR CHANGE:**

This is a relocation and change of the Site Training Manager description. The title KPB Site Training Manager was changed to Training Managers to reflect the two positions shown on Figure 3. The description was revised to reflect organizational titles and responsibilities. Deleted the specific reference to an out of date

accreditation document (ACAD 91-016) and replaced it with a generic reference to indicate compliance to current industry programs. Replaced specific terms for directives and implementing procedures with generic terms to incorporate within scope additional documents, which are used to implement the program.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational structure and titles that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi), and administrative and editorial clarifications as permitted by 10 CFR 50.54(a)(3). The removal of the specific reference to the ACAD is considered administrative only since it removes a specific reference to an out-dated document and permits implementation of the program in accordance with the standards developed by the National Academy.

**IDENTIFICATION OF CHANGE:**

Page 11, ¶ 3

Change "KPB Business Group Manager" to "Business Manager"

Page 11, ¶ 3

Change "This position is responsible to the KPB Site Vice President for providing general support to the entire Nuclear Department in key..." to "This position is responsible to the Site Vice President for providing general support to the site organization in key..."

Page 11, ¶ 3

Change "... administrative support, budgeting and planning, supply chain, development of strategic issues and business plans, project management, information technology, and information management. The areas of budgeting, supply chain, and information technology, receive direction..." to "... administrative support, procedures and document control, information and records management and project management. Reporting indirectly to this position are the areas of Supply Chain and Information Technology. These areas receive direction from NMC corporate staff and support from WPSC corporate staff."

Page 11, ¶ 3

**REASON FOR CHANGE:**

Updates to the organizational titles and responsibilities, and the deletion of the description of functional areas that are not covered under the implementation of the OQAP.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the titles and description of organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

**IDENTIFICATION OF CHANGE:**

Page 11, ¶ 4

**Add** “Procedures and Document Control – is primarily responsible for the control and issuance of implementing documents associated with OQAP activities for the Kewaunee Nuclear Power Plant.”

**REASON FOR CHANGE:**

Updates to the organizational titles and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the titles and description of organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 11, ¶ 5

**IDENTIFICATION OF CHANGE:**

**Change** “ Information Management” to “Information and Records Management”

Page 11, ¶ 5

**Change** “... control of records...” to “... control and storage of records...”

**REASON FOR CHANGE:**

Updates to the organizational titles and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the titles and description of organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 12, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Add** “..., including the site software configuration management program.”

**REASON FOR CHANGE:**

Updates to the description of organizational responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

This is a change an administrative clarification to the description of organizational responsibilities, as permitted by 10 CFR 50.54(a)(3).

Page 12, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** “... the onsite procurement process for materials and services, warehousing and storage functions, and material control.” to “... the procurement process for materials and services for the Kewaunee Nuclear Power Plant. The Supply Chain organization is also responsible for procurement engineering,

warehousing and storage functions, and material control.”

**REASON FOR CHANGE:**

Updates to the organizational responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the organizational structure and responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 12, ¶ 3

**IDENTIFICATION OF CHANGE:**

Change “KPB Assessment Manager” to “Assessment Manager”

Page 12, ¶ 3

Change “... Kewaunee Plant Assessment Group...” to “... Assessment organization...”

Page 12, ¶ 3

Change “... which includes site Licensing, Corrective Action Program, (Kewaunee Assessment Process), Self Assessment/ Process Improvement and Operational Experience Assessment activities. Also included are the Human Performance monitoring and measurements/Performance Indicators.” to “...which includes responsibilities for the corrective action, human performance and operational experience assessment programs. Reporting indirectly to this position are the areas of Regulatory Affairs (Licensing) and Self Assessment.”

Page 12, ¶ 3

Change “The areas of Licensing and...” to “The areas of Regulatory Affairs and...”

**REASON FOR CHANGE:**

Updates to the organizational titles, responsibilities and descriptions. Human performance responsibilities remain within this organization. Maintenance rule is the responsibility of Equipment Performance Engineering. The reference to measurement/performance indicators is deleted because these indicators are not specifically related to any OQAP requirements.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the titles and description of organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi) and editorial changes to remove unnecessary detail as permitted by 10 CFR 50.54(a)(3).

Page 12, ¶ 3

**IDENTIFICATION OF CHANGE:**

Delete "KPB Training Manager" and its associated description.

Page 12, ¶ 3

Delete "Security Manager" and its associated description.

**REASON FOR CHANGE:**

Relocated descriptions under the Site Operations Director (page 11) and Services Manager (page 10), respectively.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

This is an editorial change associated with format and layout of the document, as permitted by 10 CFR 50.54(a)(3)

Page 12, ¶ 4

**IDENTIFICATION OF CHANGE:**

Change "KPB Nuclear Oversight Manger" to "Nuclear Oversight Manager"

Page 12, ¶ 4

Change "... the Director – Nuclear Oversight for ensuring..." to "the Director – Nuclear Oversight and indirectly to the Site Vice President for ensuring..."

**REASON FOR CHANGE:**

Updates to the organizational titles and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the titles and description of organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi).

Page 12, ¶ 4

**IDENTIFICATION OF CHANGE:**

Delete " This position is responsible for the review of directives which control activities affecting quality."

**REASON FOR CHANGE:**

The responsibility for the review and adequacy of implementation documents to satisfy the OQAP requirements is a shared responsibility within all levels of the organization. The use of directives is one of a number of documents defined within the overall program that are used to implement the OQAP requirements. The responsible Director/Manager for a program is explicitly responsible for the overall adequacy of the documents used to implement the requirements. This change is proposed to emphasize this aspect, and to remove as a requirement the in-line review functions of the Nuclear Oversight Manager.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The change implements a quality assurance program alternative or exception previously approved by a NRC safety evaluation, including applicable bases, as permissible per 10 CFR 50.54(a)(3)(ii).

The NRC Safety Evaluation used as a basis for this change is contained in Docket No. 50-296 for the Cooper Nuclear Station. By letter, GR Horn (Nebraska Public Power District) to Document Control Desk (USNRC), dated 05/02/1997, the Cooper Nuclear station requested approval to remove the in-line review responsibilities of the Quality Assurance Department Managers of procedures and certain other line organization generated documents for inclusion of appropriate quality requirements. In the request, the appropriate line organization supervision and management would retain full responsibility for the review and adequacy of the documents. The key quality assurance provisions of this request included a three level approach to quality as follows:

- The first level of quality assurance responsibilities is assigned to each person performing work to ensure adherence to quality practices and procedures in accordance with the quality assurance program.
- The second level of quality assurance responsibilities is assigned to the supervision and management personnel to ensure the availability of necessary procedures and guidance in performing quality work.
- The third level of quality assurance responsibilities applies to the QA staff for the conduct of surveillances, evaluations and audits of activities, which affect quality. The QA staff is also responsible for the evaluation of audit results and verification of corrective action implementation. To support the second level, the QA staff would perform periodic reviews of controlling documents to ensure inclusion of appropriate quality requirements.

By letter, JR Hall (USNRC) to GR Horn (Nebraska Public Power District), dated 07/20/1998, approval was granted for the change, concluding that the submittal continued to meet the requirements of 10 CFR Part 50, Appendix B, and was acceptable.

Although not identical, this change to the Kewaunee program represents no substantive difference in scope and intent with the change described in the Nebraska Public Power District submittal and its basis for acceptability. The Kewaunee application is specific for administrative control documents (directives), while the Cooper submittal focused on the day-to-day quality program implementing documents. However, the concept and application is consistent in that both types of implementing documents focus on providing written guidance for the performance of the quality assurance program requirements. The use of directives is one of a number of documents defined within the overall quality assurance program that are used to implement the Kewaunee OQAP requirements. As such, any implementing document used to perform activities governed by the OQAP must satisfy the OQAP requirements regardless of the document type.

Currently, only directives require Nuclear Oversight Manager review, while other types of implementing documents do not.

Each of the key provisions identified in the Cooper request is required under the provisions established in the Kewaunee Operational Quality Assurance Program (OQAP).

- Broad responsibility for the implementation of the OQAP is assigned to all employees, and in certain cases contractors, when their work involves activities governed by the OQAP. This is similar to the first level of quality assurance responsibilities described in the Cooper submittal, in that each person performing work is expected to ensure adherence to quality practices and procedures in accordance with the quality assurance program.
- The Kewaunee OQAP assigns explicit responsibility to Directors and Managers for the approval of implementing documents associated with activities affecting quality. This is similar to second level of quality assurance responsibilities described in the Cooper submittal, in that responsible supervision and management personnel must ensure the availability of necessary procedures and guidance in performing quality work.
- The Nuclear Oversight organization is responsible for the performance of an independent assessment program that includes performance-based methods to evaluate the adequacy of the implementation of activities governed by the OQAP. As part of this program, both planned and emergent activities are evaluated, including the use of various types of implementing documents. The assessment program is also responsive to the identification of adverse quality trends through the corrective action program. Verification of effective implementation of selective corrective actions is performed in accordance with the OQAP requirements. This comprehensive program establishes an effective framework for monitoring the performance of the line organizations and the associated documents used in the implementation of the OQAP. These activities are similar to the third level of quality assurance responsibilities described in the Cooper submittal, and also includes the periodic reviews of controlling documents within the overall independent assessment program to ensure inclusion of appropriate quality requirements in implementing documents.

The changes described in the implementation of the quality assurance program remain consistent with the requirements of ANSI N18.7-1976 as committed. Specifically:

- Consistent with Section 5.1 of ANSI N18.7, the OQAP identifies that implementing documents are required to be developed for providing the administrative controls associated with the implementation of the OQAP.
- Consistent with Sections 3.2 and 5.2.15 of ANSI N18.7, the OQAP describes the authorities and responsibilities of the organization, including the requirements for review and approval of documents used to implement the OQAP.

For these reasons, the change is permissible per 10 CFR 50.54(a)(3)(ii).

Page 12, ¶ 4

**IDENTIFICATION OF CHANGE:**

**Change** “The KPB Nuclear Oversight Manger...” to “The Nuclear Oversight Manger...” (2 places)

Page 13, ¶ 1

**Change** “... reporting them to the Site Vice President.” to “...reporting them to the Plant Manager.”

Page 13, ¶ 1

**Change** “ ... Nuclear Oversight (NO) Staff...” to “Nuclear Oversight staff...”

Page 13, ¶ 1

**Change** “...approved directives which...” to “...approved documents, which...”

**REASON FOR CHANGE:**

Updated to reflect organizational titles, organizational responsibilities, and replaced a specific term of directives with a generic term to incorporate within scope additional documents, which are used to implement the program.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

These are changes to the titles and description of organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permitted by 10 CFR 50.54(a)(3)(vi) and an editorial clarifications permitted by 10 CFR 50.54(a)(3).

Page 13, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Add** “The Nuclear Oversight Manager shall as a minimum meet the requirements of ANSI N18.1-1971, and should have a minimum of a B. S. Degree in Science or Engineering from an accredited college or University, a minimum of five years experience in power plant construction, engineering and/or plant operation, and a familiarity with codes and regulations.”

**REASON FOR CHANGE:**

Reformat of section for document clarity. This section was relocated from the end of this descriptive section. The only change to the text was an update to the title from KPB Nuclear Oversight Manager to Nuclear Oversight Manager. No other changes were made to the content of the requirements.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes are editorial only as permitted by 10 CFR 50.54(a)(3).

Page 13, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** “... Nuclear Oversight Staff...” to “...Nuclear Oversight staff...” (2 places)

Page 13, ¶ 3

**Change** "... is comprised of:" to "... is comprised of Quality Control and Internal Assessment. Reporting indirectly to this position is the Supplier Assessment area."

**REASON FOR CHANGE:**

Editorial change and update to organizational titles and structure.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes are editorial, as permissible per 10 CFR 50.54(a)(3), and an organizational revision that continues to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi).

Page 13, ¶ 4

**IDENTIFICATION OF CHANGE:**

**Change** "Quality Control – Field..." to "Quality Control - is responsible for field..."

**REASON FOR CHANGE:**

Reformat of section for document consistency and update of titles.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes are editorial only as permitted by 10 CFR 50.54(a)(3).

Page 13, ¶ 5

**IDENTIFICATION OF CHANGE:**

**Change** "Quality Assurance" to "Internal Assessment"

Page 13, ¶ 5

**Change** " Programmatic reviews and observations to determine program..." to "... is responsible for programmatic reviews and observations of activities affecting quality to determine program..."

**REASON FOR CHANGE:**

Update organizational title, reformat of section for document consistency and editorial clarification.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes are editorial only as permitted by 10 CFR 50.54(a)(3).

Page 13, ¶ 6

**IDENTIFICATION OF CHANGE:**

**Change** "Qualified Suppliers" to "Supplier Assessment"

Page 13, ¶ 6

**Change** " Review and evaluations of procurement activities; including but not limited to, purchase requisition documents, vendor and manufacturer evaluations." to "... is responsible for assessment (audit, survey or surveillance) of supplier

quality assurance programs for qualification and use in procurement activities. This area reports directly to the NMC Manager Supplier Assessment”

**REASON FOR CHANGE:**

Update organizational title and reporting structure, reformat of the section for document consistency, editorial clarifications, and deletion of requirements for in-line QA review of purchase requisition documents to reduce the administrative burden on the Nuclear Oversight organization.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The title, format and editorial changes are permitted by 10 CFR 50.54(a)(3). The deletion of the in-line QA review of purchase requisitions implements a quality assurance program alternative or exception previously approved by a NRC safety evaluation, including applicable bases, as permissible per 10 CFR 50.54(a)(3)(ii).

The NRC Safety Evaluation used as a basis for this change is contained in Docket No. 50-440 for the Perry Nuclear Plant. By letter, DC Shelton (Centerior Energy) to Document Control Desk (USNRC), dated 08/15/1996, the Perry Nuclear station requested approval to remove the in-line review responsibilities of the Perry Nuclear Assurance Department. In the request, full responsibility for the review and adequacy of procurement documents were to be transferred to the Perry Supply Chain organization, under the Director of the Centerior Supply Chain organization. The key quality assurance provisions of this request included:

- Broad responsibility for the ensuring the adequacy of technical and quality requirements in procurement documents through review and approval was delineated to the Perry Nuclear Services Department. Specific responsibility for the review and approval of procurement documents was assigned to the Manager, Perry Supply Section.
- Knowledgeable personnel were required to review and concur with the adequacy of technical and quality requirements in procurement documents.
- Responsibilities for the audit, surveillance and qualification of suppliers were retained within the Quality organization.
- The performance of audits of the implementation of procurement activities to satisfy the requirements of 10 CFR 50 Appendix B and the Perry USAR were retained within the Quality organization.

By letter, WJ Kropp (USNRC) to LW Meyers (Centerior Energy), dated 10/29/1996, approval was granted for the change, concluding that the submittal continued to meet the requirements of 10 CFR Part 50, Appendix B, and was acceptable.

This change to the Kewaunee program is consistent in scope and intent with the change described in the Centerior Energy submittal and its basis for acceptability. Each of the key provisions identified by Centerior is also required under the provisions established in the Kewaunee Operational Quality Assurance Program

(OQAP).

- Broad responsibility for the implementation of the OQAP is assigned to all employees, and in certain cases contractors, when their work involves activities governed by the OQAP. Responsibility for the development of procurement technical and quality requirements is assigned to responsible organizations. Specific responsibility for the review and approval of procurement documents is assigned under the Manager Supply Chain.
- Knowledgeable personnel are responsible for review of procurement documents for technical and quality requirements, obtaining special technical support from responsible organizations when needed. The training and qualification to perform these activities are established within the site training program as required by the OQAP.
- Responsibility for the assessment and qualification of suppliers are retained within the Nuclear Oversight organization.
- A comprehensive program of planned and emergent independent assessments (audits) are performed to ensure that activities comply with OQAP as required by 10 CFR 50 Appendix B and Section 18 of the OQAPD.

For these reasons, the change is permissible per 10 CFR 50.54(a)(3)(ii).

Page 13, ¶ 6

**IDENTIFICATION OF CHANGE:**

Delete “The KPB Nuclear Oversight Manager shall as a minimum meet the requirements of ANSI N18.1-1971, and should have a minimum of a B. S. degree in Science or Engineering from an accredited college or university, a minimum of five years experience in power plant construction, engineering and/or plant operation, and a familiarity with codes and regulations.”

**REASON FOR CHANGE:**

Editorial change to reformat the section. Text was moved as previously described.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes are editorial only as permitted by 10 CFR 50.54(a)(3).

Page 14, ¶ 1

**IDENTIFICATION OF CHANGE:**

Change “Joint Offsite Review Committee (JOSRC)” to “Offsite Review Committee (OSRC)”

Page 14, ¶ 1

Change “JOSRC is responsible to the NMC President & CEO for review and audit...” to “OSRC is responsible to the NMC Executive Vice President & CNO for review and assessment...”

Page 14, ¶ 1

Change “... Requirements of the JOSRC Charter.” to “... requirements of the OSRC Charter.”

Page 14, ¶ 1

**Change** "...Nuclear Oversight Staff audits..." to "... Nuclear Oversight assessments..."

**REASON FOR CHANGE:**

Update the reference name of the offsite review committee to a generic term that is used through out NMC, update organizational authority and responsibilities to reflect the direction established by the President & CEO and update organizational titles.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes describe organizational revisions that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi), and editorial changes, as permissible per 10 CFR 50.54(a)(3).

Page 14, ¶ #1

**IDENTIFICATION OF CHANGE:**

**Change** "The JOSRC shall..." to "The OSRC shall..."

Page 14, ¶ #1

**Change** "... review and audit..." to "... review and assessment..."

**REASON FOR CHANGE:**

Editorial changes as previously described.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The change are editorial only, as permissible per 10 CFR 50.54(a)(3).

Page 14, ¶ #2

**IDENTIFICATION OF CHANGE:**

**Change** "The JOSRC shall..." to "The OSRC shall..."

Page 15, ¶  
following #2D

**Change** "... NMC President & CEO." to "... NMC Executive Vice President & CNO."

**REASON FOR CHANGE:**

Update the reference name for the offsite review committee and update the organizational authority and responsibilities to reflect the direction established by the President & CEO.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes describe organizational responsibilities that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi).

Page 15, ¶ #3	<p><b>IDENTIFICATION OF CHANGE:</b> <b>Change</b> "... by the JOSRC Chairman,..." to "... by the OSRC Chairman,..."</p> <p><b>Delete</b> "... upon approval by the NMC President &amp; CEO,..."</p> <p><b>Change</b> "...participate in JOSRC activities..." to "participate in OSRC activities..."</p>
	<p><b>REASON FOR CHANGE:</b> Update the reference name for the offsite review committee and update the organizational authority and responsibilities to reflect the direction established by the President &amp; CEO. Approval of alternates has been delegated to the OSRC Chairman.</p> <p><b>BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:</b> The changes describe organizational responsibility that continues to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi).</p>
Page 15, ¶ #4	<p><b>IDENTIFICATION OF CHANGE:</b> <b>Change</b> "... the Chairman - JOSRC to provide expert advice to the JOSRC." to "... the Chairman - OSRC to provide expert advice to the OSRC."</p>
Page 15, ¶ #5	<p><b>Change</b> "The JOSRC shall..." to "The OSRC shall..."</p>
Page 15, ¶ #6	<p><b>Change</b> "... the JOSRC shall..." to "... the OSRC shall..."</p>
	<p><b>REASON FOR CHANGE:</b> Update the reference name for the offsite review committee.</p> <p><b>BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:</b> The changes are editorial only, as permissible per 10 CFR 50.54(a)(3).</p>
Page 16, ¶ #7	<p><b>IDENTIFICATION OF CHANGE:</b> <b>Change</b> "The JOSRC shall..." to "The OSRC shall..."</p>
Page 16, ¶ #7A	<p><b>Change</b> "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." to "10 CFR 50.59 evaluations for 1) changes to the facility or procedures and 2) tests or experiments not receiving prior NRC approval to verify that such actions did not require NRC approval."</p>

**REASON FOR CHANGE:**

Update the reference name for the offsite review committee. Update the terminology of the section to correspond with the current 10 CFR 50.59 rule.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The change is an editorial only to reflect the current regulatory requirements and is permissible per 10 CFR 50.54(a)(3).

Page 16, ¶ #7B

**IDENTIFICATION OF CHANGE:**

**Change** “Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.” to “Proposed changes to the facility or procedures requiring prior NRC approval per 10 CFR 50.59.”

**REASON FOR CHANGE:**

Update the terminology of the section to correspond with the current 10 CFR 50.59 rule.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The change is an editorial only to reflect the current regulatory requirements and is permissible per 10 CFR 50.54(a)(3).

Page 16, ¶ #7C

**IDENTIFICATION OF CHANGE:**

**Change** “Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.” to “Proposed tests or experiments requiring prior NRC approval per 10 CFR 50.59.”

**REASON FOR CHANGE:**

Update the terminology of the section to correspond with the current 10 CFR 50.59 rule.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The change is an editorial only to reflect the current regulatory requirements and is permissible per 10 CFR 50.54(a)(3).

Page 16, ¶ #8

**IDENTIFICATION OF CHANGE:**

**Change** “Audits” to “Assessments”.

Page 16, ¶ #8

**Change** “Audits of plant activities...” to “Independent assessments (audits) of plant activities...”

Page 16, ¶ #8

**Change** “These audits shall include:” to “These shall include:”

**REASON FOR CHANGE:**

Editorial change.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The change is editorial only, as permissible per 10 CFR 50.54(a)(3).

Page 17, ¶ #8F

**IDENTIFICATION OF CHANGE:**

**Change** “... by the JOSRC or the NMC President & CEO.” to “... by the OSRC or the NMC Executive President & CNO.”

**REASON FOR CHANGE:**

Update the organizational title, authority and responsibilities to reflect the direction established by the President & CEO.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes describe organizational responsibility that continues to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi).

Page 17, ¶ #9

**IDENTIFICATION OF CHANGE:**

**Change** “The JOSRC shall report to the NMC President & CEO and shall advise the President & CEO...” to “The OSRC shall report to the NMC Executive Vice President & CNO and shall advise the CNO...”

Page 17, ¶ #9

**Change** “... paragraph 8, Audits.” to “...paragraph 8, “Assessments.”

**REASON FOR CHANGE:**

Update the organizational title, authority and responsibilities to reflect the direction established by the President & CEO and an editorial change reflecting the use of the term assessments in place or audits.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The changes describe organizational responsibility that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi), and editorial changes as permissible per 10 CFR 50.54(a)(3).

Page 17, ¶ #10

**IDENTIFICATION OF CHANGE:**

**Change** “Records of JOSRC...” to “Records of OSRC...”

Page 17, ¶#10A

**Change** “Minutes of each JOSRC meeting forwarded to the NMC President & CEO...” to “Minutes of each OSRC meeting shall be approved by the OSRC Chairman and forwarded to the NMC Executive Vice President & CNO...”

**Page 18, ¶ #10B**      **Change** "... 7.H, forwarded to the NMC President & CEO..." to "... 7.H, shall be forwarded to the NMC Executive Vice President & CNO..."

**REASON FOR CHANGE:**

Update the reference name for the offsite review committee and update the organizational authority and responsibilities to reflect the direction established by the President & CEO. Added an administrative clarification to identify that the OSRC minutes are approved by the chairman prior to submittal.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The administrative clarification is permissible per 10 CFR 50.54(a)(3). The change describing submittal of the minutes and reports of reviews to the CNO is a change in organizational responsibility that continues to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi).

**Page 18, ¶ #10C**      **IDENTIFICATION OF CHANGE:**  
**Change** "Reports of audits performed by JOSRC..." to "Reports of assessments performed by OSRC..."

**Page 18, ¶ #10C**      **Change** "...to the NMC President & CEO..." to "to the NMC Executive Vice President & CNO..."

**Page 18, ¶ #10C**      **Change** "... the areas audited within 30 days after completion of the audit." to "... the areas assessed within 30 days after completion of the assessment."

**REASON FOR CHANGE:**

Editorial changes to update the reference name for the offsite review committee, updates to reflect the term assessment in place of audit, and an update to the organizational authority and responsibilities.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The editorial changes are permissible per 10 CFR 50.54(a)(3). The organizational change describe organizational responsibility that continue to meet the requisite criteria for authority and organizational freedom in implementing quality assurance program functions, as permissible per 10 CFR 50.54(a)(3)(vi).

**Page 18, ¶ following #10C**      **IDENTIFICATION OF CHANGE:**  
**Change** "... as identified below and the PORC Charter." to "... as identified below and in the PORC Charter."

**Page 18, ¶ #2**      **Change** "... and Radiological." to "... and Radiological Protection."

**REASON FOR CHANGE:**

Editorial clarifications for sentence structure and to add the word protection to radiological as part of the discipline description.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The editorial clarification associated with the term radiological protection is permissible per 10 CFR 50.54(a)(3).

Page 20, ¶ #6H

**IDENTIFICATION OF CHANGE:**

**Change** "... Chairman of Joint Offsite..." to "... Chairman – Offsite ..."

**REASON FOR CHANGE:**

Editorial change to format and reference name for the title of the offsite review committee chairman.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 20, ¶ #6J

**IDENTIFICATION OF CHANGE:**

**Add** a comma after "... Process Control Program, ..."

**REASON FOR CHANGE:**

Editorial change.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 20, ¶ #6K

**IDENTIFICATION OF CHANGE:**

**Add** "K. Review 10 CFR 50.59 evaluations to determine if prior NRC approval is required."

**REASON FOR CHANGE:**

Update the PORC review section to incorporate the new 50.59 rule, consistent with the previously identified review scope.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The requirements for review of 50.59 evaluations is consistent with the purpose and intent of the PORC and the changes to 10 CFR 50.59. This is considered an administrative clarification and is permissible per 10 CFR 50.54(a)(3).

Page 20, ¶ #7A

**IDENTIFICATION OF CHANGE:**

**Change** "...paragraph 6.A through 6.E." to "... paragraph 6."

**REASON FOR CHANGE:**

The previous text inadvertently omitted the full list of items (6.F through 6.J) requiring review under paragraph 6. The PORC authority to recommend approval or disapproval of these omitted items also applies.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

This is considered an administrative clarification and is permissible per 10 CFR 50.54(a)(3).

Page 20, ¶ #7B

**IDENTIFICATION OF CHANGE:**

**Delete** "B. Make determinations with regard to whether or not each item considered under paragraph 6 constitutes an unreviewed safety question."

Page 20, ¶ #7B

**Change** "C. Provide immediate notification in the form of draft meeting minutes..." to "B. Provide prompt notification in the form of meeting minutes ..."

**REASON FOR CHANGE:**

Editorial change to delete the previous reference to unreviewed safety question. This requirement is obsolete under the new 50.59 rule and is replaced by the text identified in 6.K. Editorial change to remove the term immediate, which in the context of the sentence is not achievable. Also for record purposes, moved the term draft from the meeting minutes, as this document will be used as the basis of record.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3). The deletion of reference to "unreviewed safety question" and replacement in paragraph 6.K for items requiring prior NRC approval is consistent with the current regulation and previous scope of review by the PORC. Editorial changes to replace the term "immediate" with "prompt", and to delete the word "draft" are consistent with the terms described in ANSI N18.7-1976, section 4.3.3 for the records associated with organizational independent review bodies and section 5.2.12 for records. KNPP's current QA program commitment is to ANSI N18.7-1976.

Page 20, ¶ #8

**IDENTIFICATION OF CHANGE:**

**Change** "... the Chairman - Joint Offsite Review..." to "... the Chairman - Offsite Review..."

**REASON FOR CHANGE:**

Editorial change to reflect reference name for the title of the offsite review committee chairman.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 21, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Change** "... KPB Engineering Manager..." to "... Site Engineering Director..."

Page 21, ¶ 1

**Change** "... in various directives..." to "... in implementing documents..."

**REASON FOR CHANGE:**

Editorial change to reflect current title and incorporate the use of a generic phrase, "implementing documents" to broaden the context of the sentence to reflect that implementation of the requirements are not limited to a specific document type.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 21, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** "... Safety Class..." to "... Nuclear Safety Design Class..."

Page 21, ¶ 2

**Change** "... a list of the Safety Class I,II, and III structures, ..." to "...a list of the Nuclear Safety Design Classes for major structures,..."

Page 22, ¶ 1

**Change** "... USAR Appendix B, Table B.2-1." to "... USAR Appendix B.2 and Table B.2-1."

**REASON FOR CHANGE:**

Editorial changes to reflect the specific terms used in the Kewaunee USAR and to correct the reference location of the definitions.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 22, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** "The Site Training Manager is..." to "The Training Managers are..."

Page 22, ¶ 3

**Change** "...Nuclear Oversight Staff." to "... Nuclear Oversight staff."

**REASON FOR CHANGE:**

Editorial changes to reflect the current organization and remove capitalization.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 23, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** "...are implemented through directives, ..." to "...are implemented through implementing documents, such as, directives, ..."

Page 23, ¶ 2

**Change** "Technical reviews of directives are provided by department heads or process owners." to "Knowledgeable personnel other than the originator, provide technical reviews of implementing documents."

**REASON FOR CHANGE:**

The first editorial change uses the generic phrase, "implementing documents" for use through out the remainder of the description. The term is used to broaden the context of the sentence to reflect that these are examples of the types of documents used, but that the implementation of the program is not limited solely to the documents listed. The second editorial change is to remove specific titles related to the technical review of the implementing documents to provide organizational flexibility in program implementation.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The change is an administrative clarification only utilizing generic terms rather than specific document titles for review of documents consistent with the OQAP and is permissible per 10 CFR 50.54(a)(3). The OQAP continues to be implemented through controlled documents that are reviewed and approved prior to implementation. The term implementing documents is inclusive of directives, procedures and instructions, and therefore continues to satisfy the provisions of 10 CFR 50 Appendix B and ANSI N18.1-1976.

Page 23, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Delete** "Review of Nuclear Administrative Directives, and Fuel Management Directives for consistency with the OQAP is provided for by the KPB Nuclear Oversight Manager."

**REASON FOR CHANGE:**

Removal of the in-line review responsibility of directives by the Nuclear Oversight Manager is desired to emphasize the Line Management responsibility for implementation of the OQAP and reduce administrative burden. Full responsibility for directive approval would remain with the responsible line organization manager.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The deletion of in-line reviews of directives by the Nuclear Oversight Manager implements a quality assurance program alternative or exception previously approved by a NRC safety evaluation, including applicable bases, as permissible per 10 CFR 50.54(a)(3)(ii).

The NRC Safety Evaluation used as a basis for this change is contained in Docket No. 50-296 for the Cooper Nuclear Station. By letter, GR Horn (Nebraska Public Power District) to Document Control Desk (USNRC), dated 05/02/1997, the Cooper Nuclear station requested approval to remove the in-line review responsibilities of the Quality Assurance Department Managers of procedures and certain other line organization generated documents for inclusion of appropriate quality requirements. In the request, the appropriate line organization supervision and management would retain full responsibility for the review and adequacy of the documents. The key quality assurance provisions of this request included a three level approach to quality as follows:

- The first level of quality assurance responsibilities is assigned to each person performing work to ensure adherence to quality practices and procedures in accordance with the quality assurance program.
- The second level of quality assurance responsibilities is assigned to the supervision and management personnel to ensure the availability of necessary procedures and guidance in performing quality work.
- The third level of quality assurance responsibilities applies to the QA staff for the conduct of surveillances, evaluations and audits of activities, which affect quality. The QA staff is also responsible for the evaluation of audit results and verification of corrective action implementation. To support the second level, the QA staff would perform periodic reviews of controlling documents to ensure inclusion of appropriate quality requirements.

By letter, JR Hall (USNRC) to GR Horn (Nebraska Public Power District), dated 07/20/1998, approval was granted for the change, concluding that the submittal continued to meet the requirements of 10 CFR Part 50, Appendix B, and was acceptable.

Although not identical, this change to the Kewaunee program represents no substantive difference in scope and intent with the change described in the Nebraska Public Power District submittal and its basis for acceptability. The Kewaunee application is specific for administrative control documents (directives), while the Cooper submittal focused on the day-to-day quality program implementing documents. However, the concept and application is consistent in that both types of implementing documents focus on providing written guidance for the performance of the quality assurance program requirements. The use of directives is one of a number of documents defined within the overall quality assurance program that are used to implement the Kewaunee OQAP requirements.

As such, any implementing document used to perform activities governed by the OQAP must satisfy the OQAP requirements regardless of the document type. Currently, only directives require Nuclear Oversight Manager review, while other types of implementing documents do not.

Each of the key provisions identified in the Cooper request is required under the provisions established in the Kewaunee Operational Quality Assurance Program (OQAP).

- Broad responsibility for the implementation of the OQAP is assigned to all employees, and in certain cases contractors, when their work involves activities governed by the OQAP. This is similar to the first level of quality assurance responsibilities described in the Cooper submittal, in that each person performing work is expected to ensure adherence to quality practices and procedures in accordance with the quality assurance program.
- The Kewaunee OQAP assigns explicit responsibility to Directors and Managers for the approval of implementing documents associated with activities affecting quality. This is similar to second level of quality assurance responsibilities described in the Cooper submittal, in that responsible supervision and management personnel must ensure the availability of necessary procedures and guidance in performing quality work.
- The Nuclear Oversight organization is responsible for the performance of an independent assessment program that includes performance-based methods to evaluate the adequacy of the implementation of activities governed by the OQAP. As part of this program, both planned and emergent activities are evaluated, including the use of various types of implementing documents. The assessment program is also responsive to the identification of adverse quality trends through the corrective action program. Verification of effective implementation of selective corrective actions is performed in accordance with the OQAP requirements. This comprehensive program establishes an effective framework for monitoring the performance of the line organizations and the associated documents used in the implementation of the OQAP. These activities are similar to the third level of quality assurance responsibilities described in the Cooper submittal, and also includes the periodic reviews of controlling documents within the overall independent assessment program to ensure inclusion of appropriate quality requirements in implementing documents.

The changes described in the implementation of the quality assurance program remain consistent with the requirements of ANSI N18.7-1976 as committed. Specifically:

- Consistent with Section 5.1 of ANSI N18.7, implementing documents are required to be developed for providing the administrative controls associated with the applicable portions of the OQAP.
- Consistent with Section 3.2 of ANSI N18.7, the OQAP describes the authorities and responsibilities of the organization.
- Consistent with Section 5.2.15 of ANSI N18.7, the OQAP describes the

requirements for review and approval of documents used to implement the OQAP.

For these reasons, the change is permissible per 10 CFR 50.54(a)(3)(ii).

Page 23, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** “Nuclear administrative directives are reviewed and approved by the appropriate responsible Director/Manger.” to “Implementing documents are reviewed for consistency with the OQAP and approved by the responsible Director/Manager, or designee.”

Page 23, ¶ 3

**Change** “These directives are prepared...” to “These implementing documents are prepared...”

**REASON FOR CHANGE:**

Editorial changes for the use of a generic term, implementing documents, to broaden the context of responsibility, update responsibility for review per the previous paragraph change, update the organizational title, and an administrative clarification to recognize the use of designees.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Administrative clarifications and editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 23, ¶ 4

**IDENTIFICATION OF CHANGE:**

**Change** “Fuel Management Directives are reviewed...” to “Implementing documents for fuel management are reviewed...”

**REASON FOR CHANGE:**

Editorial change involving the use of a generic term, implementing documents, to broaden the scope of responsibility.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 24, ¶ #4

**IDENTIFICATION OF CHANGE:**

**Change** “ Audits of implementing directives shall...” to “Independent assessments (audits) of implementing documents shall...”

Page 24, ¶ #4

**Change** “... differences of opinion which cannot...” to “... differences of opinion, which cannot...”

**REASON FOR CHANGE:**

Editorial change involving the use of the term assessments in place of audits, implementing documents instead of implementing directives to broaden the scope to include documents used to implement the program, punctuation for sentence structure and update of organizational name.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 25, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Change** "... established by directives to ensure..." to "... established by implementing documents to ensure..."

Page 25, ¶ 1

**Change** "Directives shall be prepared to augment..." to "Administrative controls shall be described in implementing documents to augment..."

**REASON FOR CHANGE:**

Editorial change involving the use of a generic term, implementing documents, to broaden the scope.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 25,  
following ¶ #7

**IDENTIFICATION OF CHANGE:**

**Delete** "PORC shall be responsible for reviewing proposed changes or modifications that affect nuclear safety. JOSRC shall review the safety evaluation of changes completed under the provision of 10CFR50.59 to verify that such actions do not constitute an unreviewed safety question."

**REASON FOR CHANGE:**

These statements are redundant to requirements previously stated in PORC and OSRC sections.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 26, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Change** "... established in directives..." to "... established in implementing documents..."

Page 26, ¶ 2

**Change** "The directives shall..." to "The implementing documents shall..." (2

places)

Page 26, ¶ 2

**Change** "... includes a verification..." to "... includes verification..."

Page 26, ¶ 2

**Change** "... that through either source..." to "... that through source..."

Page 26, ¶ 2

**Change** "... supplier audits..." to "... supplier assessments..."

**REASON FOR CHANGE:**

Editorial change involving the use of generic term, implementing documents, to broaden the scope of applicability, editorial changes to sentence grammar and an editorial change using the word assessment in place of audit to reflect the terminology used in the program.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 26, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** "... appropriate directives..." to "appropriate implementing documents..."

Page 26, ¶ 3

**Change** "These procedures..." to "Implementing documents..."

**REASON FOR CHANGE:**

Editorial change involving the use of generic term, implementing documents, to broaden the scope of applicability.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 27, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** "...established by directives..." to "... established through implementing documents..."

Page 27, ¶ 2

**Change** "These directives shall..." to "These implementing documents shall..."

**REASON FOR CHANGE:**

Editorial change involving the use of generic term, implementing documents, to broaden the scope of applicability.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 27, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** "... controlled by formal directives. These directives..." to "... controlled through implementing documents. These implementing documents..."

**REASON FOR CHANGE:**

Editorial change involving the use of generic term, implementing documents, to broaden the scope of applicability.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 28, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Change** "Directives shall..." to "Implementing documents shall..."

**REASON FOR CHANGE:**

Editorial change involving the use of generic term, implementing documents, to broaden the scope of applicability.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 28, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** "A Qualified Suppliers System shall be established and maintained by directives..." to "A Qualified Suppliers List shall be established and maintained through implementing documents ..."

Page 28, ¶ 2

**Change** "Qualified Suppliers System shall..." to "Qualified Suppliers List shall..."

Page 28, ¶ 2

**Change** "Directives shall..." to "Implementing documents shall..."

**REASON FOR CHANGE:**

Editorial change involving the use the current name of the control system for suppliers, and an editorial change involving the use of a generic term, implementing documents, to broaden the scope of applicability.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 29, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Change** "... safety-related..." to "... safety-related..."

**REASON FOR CHANGE:**

Editorial, delete space after hyphen.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 29, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** "...receipt, directives shall establish a receipt..." to "... receipt, implementing documents shall establish receipt..."

Page 29, ¶ 3

**Change** "KPB Nuclear Oversight Manager..." to "Nuclear Oversight Manager..."

Page 30, ¶ 1

**Change** "... appropriate plant directives and procedures." to "... appropriate implementing documents."

**REASON FOR CHANGE:**

Editorial change involving the use of a generic term, implementing documents, an editorial change for grammar, editorial change for organizational title and an editorial change involving an organizational name.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 31, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** "Plant directives and procedures shall..." to "Implementing documents shall..."

Page 31, ¶ 4

**Change** "... the Work Request..." to "... the Work Order..."

**REASON FOR CHANGE:**

Editorial only, wording change involving the use of a generic term, implementing documents, and editorial change to reflect terminology used within the work control program.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 32, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** "Nuclear administrative directives..." to "Implementing documents..."

Page 32, ¶ 3

**Change** "Directives shall..." to "Implementing documents shall..."

Page 32, ¶ 4

**Change** “Directives shall...” to “Implementing documents shall...”

**REASON FOR CHANGE:**

Editorial change involving the use of generic term, implementing documents, to broaden the scope of applicability.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 33, ¶ 1

**IDENTIFICATION OF CHANGE:**

**Change** “... in this criteria...” to “... in these criteria...”

Page 33, ¶ 1

**Change** “... implemented through plant directives which are controlled by the Nuclear Oversight organization.” to “...implemented through implementing documents which are controlled by responsible organizations.”

Page 33, ¶ 1

**Change** “... described in plant directives which are controlled by the Operations and Planning and Scheduling organizations.” to “... described in implementing documents which are controlled by the Operations and Outages & Scheduling organizations.”

**REASON FOR CHANGE:**

All changes are editorial to correct grammar, include the use of a generic term, implementing documents correct the responsibilities description for material control because it is not limited to a single organization, and an update in an organizational name.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 33, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** “The Work request...” to “The work order...”

**REASON FOR CHANGE:**

Editorial change to reflect the correct terminology for work control.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 34, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** “... on a Material Nonconformance Report and...” to “... in accordance with approved implementing documents and...”

Page 34, ¶ 2 Change “Material Nonconformance Reports... ” to “Material nonconformances...”

Page 34, ¶ 2 Change “ ... shall be reinspected...” to “... are reinspected...”

**REASON FOR CHANGE:**

Editorial change involving the use of generic terms for documenting material nonconformances. The specific form is no longer called a Material Nonconformance Report. Also an editorial change for grammar.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 35, ¶ 2 **IDENTIFICATION OF CHANGE:**  
Add a comma after the phrase “... and reviewed for events,...”

Page 35, ¶ 3 Change “... in appropriate directives and Quality Procedures...” to “implementing documents”

Page 35, ¶ 3 Change “...control audit findings.” to “... control independent assessment (audit) findings.”

Page 35, ¶ 3 Change “...as a result of audits.” to “... as a result of independent assessments.”

Page 35, ¶ 3 Delete “ These findings shall be documented in accordance with approved procedures”

Page 35, ¶ 3 Change “... for audit findings shall...” to “... for these findings shall...”

Page 35, ¶ 3 Change “... the audited organization...” to “... the assessed organization...”

**REASON FOR CHANGE:**

Editorial change involving the use of a generic term, implementing documents, deletion of duplicate requirement, and editorial changes involving the use of assessment and assessed in place of audits and audited.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 36, ¶ 1 **IDENTIFICATION OF CHANGE:**  
Change “Directives shall...” to “Implementing documents shall...”

Page 36, ¶ 1

**Change** “These directives shall...” to “These implementing documents shall...”

**REASON FOR CHANGE:**

Editorial change involving the use of a generic term, implementing documents.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 36, ¶ 2

**IDENTIFICATION OF CHANGE:**

**Change** “Records shall be primarily maintained in the KNPP QA Vault...” to “Records shall be maintained in the KNPP Records Vault...”

Page 36, ¶ 2

**Add** “... or another facility satisfying the permanent record storage requirement of the QA program.”

Page 36, ¶ 2

**Change** “... the KNPP QA Vault...” to “... the KNPP Records Vault...”

**REASON FOR CHANGE:**

Editorial change to remove an unnecessary adjective, reflect the current name of the storage facility and an administrative clarification to include identification of the storage of records in other locations that meet the requirements of the QA program commitments. This may include qualified storage locations not within the Kewaunee site boundary.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes and administrative clarifications are permissible per 10 CFR 50.54(a)(3). The OQAP requires that the storage of records satisfy the requirements of ANSI N18.7-1976, including with specific exceptions the requirements of ANSI N45.2.9-1974. No change in intent to the implementation of the program commitments is involved.

Page 36, ¶ 3

**IDENTIFICATION OF CHANGE:**

**Change** “Directives shall provide...” to “Implementing documents shall provide...”

**REASON FOR CHANGE:**

Editorial change involving the use of a generic term, implementing documents.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 36, ¶ 4

**IDENTIFICATION OF CHANGE:**

**Change** “Audits shall be conducted in accordance with appropriate directives,

procedures, or instructions to verify...” to “Independent assessments (audits) shall be conducted utilizing performance-based methods in accordance with appropriate implementing documents to verify...”

**Page 36, ¶ 4**      **Change** “Audits shall be conducted...” to Independent assessments shall be conducted...”

**Page 36, ¶ 4 –  
Page 37, ¶ 1**      **Change** “... Fuel Management activities, Purchasing Department activities, and Supplier activities.” to “... fuel management activities, procurement and material control activities, and supplier activities.”

**Page 37, ¶ 1**      **Change** “... documented audits shall...” to “...documented independent assessments shall...”

**Page 37, ¶ 1**      **Change** “Audits of selected aspects...” to “Independent assessments of selected aspects...”

**Page 37, ¶ 1**      **Change** “... an audit of all...” to “... an independent assessment of all...”

**REASON FOR CHANGE:**

Editorial changes to reflect the use of the term independent assessment in place of the term audit, and editorial changes to the formatting of a sentence.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

**Page 37, ¶ 1**      **IDENTIFICATION OF CHANGE:**  
**Change** “A quality assurance program has been developed to cover the auditable portions of the Technical Specifications over a five year interval.<sup>1,2</sup>” to “An independent assessment program has been developed to assess the implementation of the Technical Specifications during planned and emergent performance based assessments.”

**Page 37, ¶ 1**      **Change** “Audits shall be performed...” to “These assessments shall be performed...”

**Page 37, ¶ 1**      **Change** “... activity being audited.” to “... activity being assessed.”

**REASON FOR CHANGE:**

The first change is made to apply the use of an alternative methodology to the independent assessment methods associated with the Kewaunee Technical Specifications to remove the specific requirement to audit all auditable portions of the Technical Specifications over a five year interval. The remaining changes are editorial to incorporate the use of the term assessments and assessed in place of

audits and audited.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The first change implements a quality assurance program alternative or exception previously approved by a NRC safety evaluation, including applicable bases, as permissible per 10 CFR 50.54(a)(3)(ii).

The NRC Safety Evaluation used as a basis for this change is contained in Docket No. 50-245, 50-336 and 50-423 for the Millstone Nuclear Power Station, Units 1, 2 and 3. By letter, ML Bowling Jr. (Northeast Nuclear Energy) to Document Control Desk (USNRC), dated 01/13/1999, the Millstone Nuclear station requested approval to discontinue a commitment to audit over a five year period the sections, subsections and tables of the Technical Specifications. The key quality assurance provisions of this request included:

- Use of a performance-based method to conduct audits of the Technical Specifications that focuses on areas of concern and activities with the greatest impact on safety and reliability.
- The implementation of the performance-based method was consistent with the approach described in the Northeast Utilities Quality Assurance Program Topical Report.

By letter, ED Adensam (USNRC) to ML Bowling Jr. (Northeast Nuclear Energy), dated 02/22/1999, approval was granted for the change, concluding that the change:

- Removes excessive detail, thereby giving the licensee flexibility in making changes without the need for a license amendment.
- The change allows the licensee to focus on areas with the highest safety significance.

This change to the Kewaunee program is consistent in scope and intent with the change described in the Northeast Nuclear Energy submittal and its basis for acceptability. Each of the key provisions identified by Northeast Nuclear is also required under the provisions established in the Kewaunee Operational Quality Assurance Program (OQAP). Namely, the Kewaunee Operational Quality Assurance Program includes:

- The use of performance-based methods to conduct independent assessments of the implementation of the Technical Specifications. The independent assessment program includes the use of planned and emergent assessments to focus on areas with the most significant impact and on areas of concern. Emergent assessments are related to the implementation of the corrective action program for verification of adequate corrective actions for identified problems.
- The use of this methodology is consistent with the requirements stated in the OQAP, namely that the frequency of assessments should be based on the status and importance to safety of the activity.

A more comprehensive discussion regarding the independent assessment of the

implementation of the Technical Specifications is contained in letters from CW Giesler (WPSC) to J.F. Streeter (NRC), dated August 22, 1983, and RL Spessard (USNRC) to CW Giesler (WPSC), dated September 30, 1983. The change made to the OQAP affects only the five-year commitment and the requirement to select each auditable provision within the five-year period. The independent assessment program continues to include as a part of its requirement, the selection of Technical Specification implementation areas for assessment.

The remaining changes are editorial only and permissible per 10 CFR 50.54(a)(3).

**IDENTIFICATION OF CHANGE:**

Page 37, ¶ 2 **Change** “Preparation of procedures for audits, ...” to “Preparation of assessments, ...”

Page 37, ¶ 2 **Change** “... documentation of audit findings, and issuance of audit reports ...” to “... documentation of findings, and issuance of assessment reports ...”

Page 37, ¶ 2 **Change** “... described by applicable directives or procedures.” to “... described in implementing documents.”

Page 37, ¶ 2 **Change** “Supervisory personnel of the audited activity shall review the audit report...” to “Responsible personnel of the assessed activity shall review the results...”

Page 37, ¶ 2 **Change** “Follow-up action shall be provided for by the OQAP...” to “Follow-up action shall be provided...”

**REASON FOR CHANGE:**

The first change is an administrative clarification to correct the intended focus of the paragraph to the performance of assessments. Requirements for the preparation of implementing documents, including procedures, are previously described in Section 6.0, Document Control of the OQAPD. Additional editorial changes were made to reflect the use of a generic term, implementing documents, to reflect the use of the term assessment or assessed in place of the term audit or audited, use a generic term responsible in place of supervisory, and to improve grammar.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Administrative and editorial changes are permissible per 10 CFR 50.54(a)(3).

**IDENTIFICATION OF CHANGE:**

Page 37, following ¶ 2 **Remove** source references, “<sup>1</sup> Letter from C. W. Giesler (WPSC) to J. F. Streeter (NRC) dated August 22, 1983.” and “<sup>2</sup> Letter from R. L. Spessard (NRC) to C. W. Giesler (WPSC) dated September 30, 1983”

**REASON FOR CHANGE:**

Editorial change for consistency in format. Source references are not contained in any other portions of the description.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 39, ¶ 1

**IDENTIFICATION OF CHANGE:**

Change "... Technical Specifications will take precedence." to "...Technical Specifications take precedence."

**REASON FOR CHANGE:**

Editorial to correct sentence grammar.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 39, ¶ 3

**IDENTIFICATION OF CHANGE:**

Add "5.2.2 This section requires that temporary changes, which clearly do not change the intent of approved procedures, shall as a minimum be approved by two members of the plant staff knowledgeable in the areas affected by the procedures. At least one of these individuals shall be the supervisor in charge of the shift and hold a senior operator license on the unit affected. Kewaunee Technical Specification 6.8.b does not require the licensed senior reactor operator to be the individual in charge of the shift.

**REASON FOR CHANGE:**

Provide an administrative clarification concerning the approval of temporary changes as contained within the current Kewaunee Technical Specifications.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**

The change is an administrative clarification only and is permissible per 10 CFR 50.54(a)(3).

Page 40, ¶ 4

**IDENTIFICATION OF CHANGE:**

Add commas prior to and following the phrase "... ,which govern safety-related activities, ..."

**REASON FOR CHANGE:**

Editorial to correct sentence punctuation.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**  
Editorial changes are permissible per 10 CFR 50.54(a)(3).

Page 41, ¶ #2

**IDENTIFICATION OF CHANGE:**

Change “Nuclear department heads...” to “Affected site organizations...”

**REASON FOR CHANGE:**

Administrative clarification to accurately reflect the implementation of the activity.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**  
The change is an administrative clarification only and is permissible per 10 CFR 50.54(a)(3).

Page 41, ¶ #4

**IDENTIFICATION OF CHANGE:**

Change “Kewaunee Assessment Process (KAP)” to “Corrective Action Program”

Page 41, ¶ #4

Change “... during the KAP evaluation process are revised before the KAP corrective...” to “... during the corrective action evaluation process are revised before the corrective...”

**REASON FOR CHANGE:**

Editorial to reflect the current terminology used to implement the program.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**  
The change is editorial only and is permissible per 10 CFR 50.54(a)(3).

Page 42, ¶ 2

**IDENTIFICATION OF CHANGE:**

Change “... in the KNPP QA Vault...” to “... in accordance with QA Program commitments...”

**REASON FOR CHANGE:**

Administrative clarification to identify the control of records applies for both permanent and temporary storage of records by deleting a reference to a specific storage location and editorial changes.

**BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:**  
The changes are administrative or editorial only and are permissible per 10 CFR 50.54(a)(3) and is consistent with the site’s program commitment to ANSI N45.2.9-1974.

<b>Page 42, ¶ 3</b>	<b>IDENTIFICATION OF CHANGE:</b> <b>Change</b> “...in the KNPP QA Vault...” to “... in a single record storage facilities...”
<b>Page 43, ¶ 1</b>	<b>Change</b> “... to the vault differ.” to “... to the permanent storage facility differ.”
<b>Page 43, ¶ 2</b>	<b>Change</b> “... to the KNPP QA Vault.” to “... to the permanent record storage facilities.”
<b>Page 43, ¶ 2</b>	<b>Change</b> “... in the vault would be...” to “... in the permanent storage facility would be...”
<b>Page 43, ¶ 3</b>	<b>Change</b> “... to the vault.” to “... to the permanent storage facilities.”
<b>Page 43, ¶ 3</b>	<b>Change</b> “... to the KNPP QA Vault.” to “... to the permanent record storage facilities.”
	<b>REASON FOR CHANGE:</b> An administrative clarification to identify records may be maintained in more than one physical location.
	<b>BASIS FOR NOT INVOLVING A REDUCTION IN COMMITMENT:</b> The change is an administrative clarification only and is permissible per 10 CFR 50.54(a)(3) and is consistent with the program commitment to ANSI N45.2.9-1974.
<b>Pages 44-46</b>	Changes to Organizational Charts are previously described in the document text.

Docket 50-305  
NRC-02-046  
June 5, 2002

Attachment 3

to

Letter from M. E. Warner (NMC) to NRC Document Control Desk

dated

June 5, 2002

Strikeout Version

of the

Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 22

(Reference only)

<p style="text-align: center;">Kewaunee Nuclear Power Plant  <i>Operated by</i>  <b>Nuclear Management Company, LLC</b></p> <p style="text-align: center;"><b>Operational Quality Assurance  Program Description</b></p>	<div style="text-align: right;">  </div> <p style="text-align: center;">Date: <u>07/11/04</u><u>06/05/02</u></p> <p style="text-align: center;">Rev. <del>21</del> <u>B22</u></p> <p style="text-align: center;">Page 1 of 51</p>
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## INTRODUCTION

The policy of Nuclear Management Company, LLC is to comply with the requirements of the Operational Quality Assurance Program (OQAP) which is authorized under the direction of the President & CEO – Nuclear Management Company. The OQAP fulfills the requirements of 10CFR50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." Compliance with the OQAP is mandatory for applicable Nuclear Management Company and Wisconsin Public Service Corporation employees. Equivalent measures appropriate to the circumstance shall be enforced upon suppliers of materials, equipment or services.

Wisconsin Public Service Corporation (WPSC) entered into a Nuclear Power Plant Operating Services Agreement (NPPOSA) with the Nuclear Management Company, LLC (NMC). Under the service agreement, the NMC is designated as the Contracting Owner of the Facility Operating License (NRC No. 50-305) for the Kewaunee Nuclear Power Plant and is responsible for the operation and maintenance of the plant in accordance with the terms and conditions of the license. Ownership of the Kewaunee Nuclear Power Plant assets remains with Wisconsin Public Service Corporation and is not affected by the transfer of operating authority.

The Operational Quality Assurance Program is established to define, implement and audit operation, maintenance, and modification activities related to nuclear plant safety. The OQAP complies with the provisions of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," with exceptions, interpretations, and qualifications noted in Appendix A of this description.

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**1.0 ORGANIZATION**

**1. General Requirements**

The NMC shall be responsible for the establishment and implementation of the Operational Quality Assurance Program. All members of the organization involved in operation of the Kewaunee Nuclear Power Plant (KNPP) shall be made aware of and recognize the necessity for well formulated and detailed administrative controls to assure safe and efficient operation. Lines of authority, responsibility and communication are established under the direction of the NMC President & Chief Executive Officer and identify all levels of management involved in the OQAP, (See Figures 1, 2 & 3). The quality assurance functions performed by each organizational element are cited in the descriptions below.

**2. Duties and Responsibilities – Nuclear Management Company Offsite (Figure 1)**

President & Chief Executive Officer (CEO)

This position is responsible for providing top level direction of all activities associated with the safe and reliable operation of NMC's nuclear sites. ~~The President & CEO provides guidance with regards to company quality assurance program.~~ Lines of authority and responsibility are established under the direction of the President & CEO for implementation of the Quality Assurance Program. This position has delegated specific authority and responsibilities as described in the following, and as shown in Figure 1.

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Executive Vice President & Chief Nuclear Officer (CNO)

This position has responsibility for all matters relating to the operation and maintenance of the Kewaunee Nuclear Power Plant. The President & CEO has also delegated to this position the overall responsibility and authority for the implementation of the NMC Quality Assurance Program requirements and the activities of the Offsite Review Committee. Reporting to the Executive Vice President & Chief Nuclear Officer, are the Senior Vice President Nuclear Operations, Senior Vice President Nuclear Support Programs, and Senior Vice President Assessment Programs, and Vice President Programs Training. The Executive Vice President & CNO has delegated specific authority and responsibility to these positions as shown in Figure 1.

Senior Vice President – Nuclear Operations

This position is responsible for managing the site organizations' operations by directing and coordinating activities consistent with established goals, objectives, and policies. Follows This position is responsible for implementation of directions set by the CNO, President, and Board of Directors. Provides providing direction and structure for the operating units. Participates in developing policy, and participating in the development of policies and strategic plans affecting nuclear operations. Reporting to this position is the Site Vice President, Director - Regulatory Affairs & Strategic Issues and the Director - Outage. Respectively, these positions are responsible for the overall leadership of the site organization, regulatory and licensing services, including license renewal programs, and focused outage management.

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Senior Vice President – Nuclear Support Programs

This position, along with ~~vice president, Director, and Manager~~ support, is responsible for Kewaunee Nuclear Power Plant nuclear fuel design and supply, high level waste management, security, procurement, warehousing, and support for emergency planning, engineering services and programs, and industrial safety and health, radiation protection, chemistry, and emergency preparedness programs.

~~Senior Vice President Nuclear~~ Vice President - Assessment Programs

This position is responsible for the overall ~~quality assurance,~~ NMC Quality Assurance Program development and maintenance, oversight and assessment activities. Under this ~~Senior Vice President,~~ the ~~Director Nuclear Oversight~~ has primary responsibility for the ~~QA Program Description, corporate directives, internal audit program, supplier qualification~~ This position, along with Director and Manager support is responsible for the internal assessment (audit) program, supplier assessment (qualification) program, quality control program-services for applicable sites, performance assessment program, self assessment program, corrective action program, off-site review committee coordination, and Employee Concerns Program.

Vice President - Training

This position, along with Director and Manager support is responsible for the development of corporate training programs and processes, including leadership development.

~~Vice President~~ Engineering

~~This position is responsible for providing engineering support, and services, including, but not limited to, program engineering, design changes, design analyses, and engineering evaluations of plant performance.~~

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Director – Regulatory Affairs & Strategic Issues

~~This position is responsible for the overall regulatory services associated with licensing activities. This position is also responsible for license renewal programs.~~

Senior Vice President – Business & Operations Support

~~This position is responsible for the areas of administrative, human resources, and information technology services, security, supply chain, and integrated work management.~~

Vice President – Treasurer & CFO

~~This position is responsible for business development and planning, finance, accounting, and payroll.~~

Senior Vice President - Business Development

~~This position is responsible for the development and implementation of NMC business growth strategies, business integration of NMC sites and corporate communications. Corporate communications provides support in the implementation of the site Emergency Plan.~~

**3. Duties and Responsibilities – Wisconsin Public Service Corporation Offsite (Figure 2)**

Senior Vice President – Development~~Director – Nuclear Oversight~~

~~This position reports directly to the Chairman, President & Chief Executive Officer of WPS Resources, who is also the WPSC Chairman and Chief Executive Officer for nuclear responsibilities. This position~~Wisconsin Public Service Corporation (WPSC) and is responsible for monitoring and managing of the KNPP asset,

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performing cost benefit analysis and those licensing responsibilities associated with KNPP that are maintained within WPSC. This position is responsible for interface activities with the Nuclear Management Company.

Manager Assistant Vice President - Corporate Services

This position reports to the WPSC Chairman and Chief Executive Officer for nuclear responsibilities. This position is responsible for the implementation of the Operational Quality Assurance Program requirements associated with the activities affecting quality performed by the Purchasing and Stores Group, Project & Facility Services, Information Technology, and Environmental Services organizations involving KNPP and ensuring support is available for special projects involving KNPP. The Purchasing and Stores Group is responsible for providing support to procurement activities for KNPP. The Project & Facility Services Group is responsible for providing engineering and design support for KNPP; physical facilities, as requested. They also have responsibility for preparation, review, revision and issue of appropriate directives controlling engineering activities performed primarily by this group. The Information Technology Services is responsible for providing computer system support for KNPP. Environmental Services is responsible for providing and overseeing the Hazardous Chemical Control and Waste Management Plans.

Manager – Substation and Transmission

This position reports to the Vice President Transmission and Engineering Distribution and Customer Service and is responsible for substation and transmission activities and the implementation of the quality assurance requirements associated with these functions. The Substation and Transmission

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Group is responsible for implementing the OQAP, as applicable, whenever their work involves KNPP.

**4. Duties and Responsibilities – Nuclear Management Company Onsite (Figure 3)**

KPB-Site Vice President

This position is responsible for ~~all plant~~the overall leadership of the site ~~organizations and~~ activities associated with safe and reliable operation, maintenance, engineering, assessment and technical support. He is also responsible for the activities of the site business group associated with budgeting, purchasing, strategic planning and ~~of the Kewaunee Nuclear Power Plant and~~ implementation of the OQAP requirements. Reporting to this position are the Site Operations Director, Business information management. The KPB Site Vice President ~~Manager and Assessment Manager~~. Indirectly reporting to this position are the areas of Nuclear Oversight, Human Resources and Employee Concerns Program. This position maintains authority and responsibility for specific NRC correspondence such as 10CFR21 reports, license amendments and written correspondence signed under oath or affirmation in accordance with 10 CFR 50.54(f). This position has delegated specific authority and responsibilities as described below ~~to the groups~~in the following and as shown in Figure 3.

Site Operations Director

This position is responsible to the Site Vice President for providing focused management direction of operational issues associated with the Kewaunee Nuclear Power Plant. Reporting directly to this position are the Plant Manager, Services

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Manager and Training Managers. Indirect reports to this position include the Site Engineering Director.

Plant Manager

This position is responsible to the ~~KBP Site Vice President~~ Site Operations Director for the safe and reliable operation and maintenance of the plant in accordance with the requirements of the OQAP and is responsible for the functions of the Plant Operations Review Committee. This position has the responsibility for the review, approval, and verification of implementation of ~~nuclear administrative directives~~ activities affecting quality for his ~~designated~~ designated areas of responsibility. These areas include maintenance, operations, ~~and planning~~ outages and scheduling, and indirectly the industrial safety and health program, as described below:

Plant Maintenance – (Electrical/Mechanical/Instrument & Control) - is responsible for ~~maintenance of plant equipment and maintenance engineering activities.~~ implementation of the corrective and preventative maintenance programs.

Plant Operations – is responsible for plant operations including general supervision of all shift operating personnel, ~~and shift technical advisors.~~ Operations maintain the authority and responsibility for system status control and equipment operation during all modes of plant operation and under emergency conditions in accordance with the site license and Technical Specifications.

Planning ~~Outages and Scheduling~~ – is responsible for plant outage coordination activities, administration of the work ~~request~~ control system, and planning and scheduling for routine and corrective maintenance activities.

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Industrial Safety and Health– is responsible for assisting in establishing and monitoring the implementation of industrial safety and health policies at the site for the protection of workers from industrial hazards. This area reports to the NMC Manager Operations Programs.

KPBSite Engineering Manager~~Director~~

This position is responsible for the leadership and supervision of the site Engineering and Technical Support group. ~~organization and functions of the Quality Assurance Typing Committee.~~ This position is responsible to the Vice President Engineering and indirectly to the Director Site Operations. This position ensures that engineering support is provided to the Kewaunee Nuclear Power Plant. The aspects of this support include, but are not limited to, the evaluation and implementation of physical changes to the plant, engineering evaluations of plant performance, administration and implementation of engineering programs, providing specialized analytical skills as needed to support the plant, and providing engineering support on a plant systems basis. Reporting indirectly through this position for nuclear fuel activities is the Project Manager Kewaunee/Point Beach, who reports through the NMC Director Nuclear Fuels. This position has the responsibility for review, approval, and verification of implementation of ~~nuclear administrative directives~~activities affecting quality for ~~his area~~designated areas of responsibility. These areas are described below:

Physical Change—~~The physical change process is the method for implementing changes to the plant such as permanent plant modifications/changes, temporary plant modifications/changes, and procurement technical evaluations. This area is not permanently staffed, but rather, is a process supported by the engineering and~~

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~~technical support staff. Procurement technical evaluations are supported by the Supply Chain area.~~

Design Engineering – is the primary design organization for the site, responsible for the preparation and implementation of permanent and temporary design changes and plant modifications, including when required, supporting design analysis, calculations or evaluations. Examples of design analysis activities include piping support and stress analysis, electrical distribution and protection coordination, equipment set point analysis, and component seismic analysis. Personnel performing analysis are responsible for assuring that selected analytical software products comply with QA criteria for safety-related software controls where applicable. This organization is also responsible for drawing control and the development and maintenance of design specifications and standards.

~~Engineering Programs – All program~~Program Engineering – is responsible for the administration and management of site engineering programs. Engineering program functional areas are responsible for providing the program specialist for that the applicable program. The program specialist is responsible for the management of the program, program performance and implementation. Project teams will be created when appropriate by supplementing the program specialists with Engineering & Technical Support staff or other nuclear engineering staff with other NMC staff. Responsibilities of the specialist and team include interaction with customers and senior nuclear management, as necessary. The program team has complete ownership of the program, i.e., responsibility and accountability for successful implementation of the program. Examples of program areas are listed below: include:

~~Fire Protection~~

~~Reactor Engineering Program~~

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<del>ISI Program</del>	<del>Steam Generator Program</del>
<del>IST/Check Valve Program</del>	<del>STA Program</del>
<del>Heat Exchanger Performance Program</del>	<del>Turbine Program</del>
Maintenance Rule Program	
<u>Containment Leak Rate Testing</u>	<u>Heat Exchanger Performance</u>
<u>Environmental Qualification</u>	<u>Non-Destructive Examination</u>
<u>Flow Accelerated Corrosion</u>	<u>Probabilistic Risk Assessment</u>
<u>Fire Protection</u>	<u>Reactor Engineering</u>
<u>In-Service Inspection</u>	<u>Reactor Pressure Vessel Integrity</u>
<u>In-Service Testing</u>	<u>USAR Safety Analysis</u>

Equipment Performance Engineering – is responsible for monitoring and improving the performance of plant equipment. Functional responsibilities include system and component engineering, maintenance engineering, preventative maintenance optimization and predictive maintenance technology application. This organization is also responsible for the implementation and management of the maintenance rule program.

Engineering Process / Support – is responsible for providing process support of the engineering department activities. Functional responsibilities include performance and coordination of corrective action program and self-assessments within the engineering department, planning and scheduling of engineering interfaces with plant activities and the development and monitoring of department performance.

Engineering and Technical Support (E&TS) Group – The groups are responsible for providing the engineering and technical support for all plant processes, programs and systems. This includes supporting physical change, programs, projects,

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~~evaluations, maintenance of the system descriptions, drawings, specifications, procedures, plant equipment database, and QA typing documentation. Multi-discipline or multi-department teams are employed to address the engineering needs of the plant, where necessary.~~

~~Analytical Engineering This group is responsible for providing specialized or computer based analysis support to the various groups in the E&TS. Engineering support provided by Analytical Engineering includes Accident Analysis, Probabilistic Risk Assessment, Piping Support and Stress Analysis, Equipment Qualification, Electrical Distribution and Coordination, Set Point Analysis, and Seismic Analysis/SQUG. Personnel assigned to this group are responsible for assuring their tools comply with the QA criteria for safety related software, programmatic requirements, and commitments associated with their efforts.~~

~~KPB Services Manager~~

~~This position is responsible to the Director Site Operations for plant activities associated with Chemistry, Health Physics, Radiation Protection, Industrial Safety, and Nuclear Emergency Preparedness. Indirect responsibility also includes site Security activities. This position has the responsibility for review, approval, and verification of implementation of nuclear administrative directives affecting quality for his areadesignated areas of responsibility. These areas of responsibility for the KPB Services Manager include:~~

~~Plant Radiation Protection – is responsible for radiation protection, and plant health physics activities, radioactive waste processing, off site dose calculation and the Radiological Eenvironmental Mmonitoring Pprograms.~~

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Plant Radiochemistry – is responsible for plantsite chemistry activities, including process control monitoring of plant systems and environmental monitoring of waste discharges from the site.

Industrial Safety – is responsible for site industrial safety activities.

Nuclear Emergency Preparedness - is responsible for the maintenance of an effective emergency preparedness program. Specific responsibilities and duties for the various nuclear emergency preparedness activities are defined in the appropriate directives and implementing procedures implementing documents.

Security - is responsible for plant physical security, access authorization and fitness for duty programs. Specific responsibilities and duties for the various security activities are defined in the appropriate implementing documents. The Security organization reports directly to the NMC Director Security.

Training Managers

Under the direction of the Operations and Technical Training Managers, training has been delegated the responsibility to develop, maintain, and provide employee training that meets the needs of the Kewaunee Nuclear Power Plant (KNPP). The Training organization is responsible for the accredited training programs as described in National Academy of Nuclear Training documents. Specific responsibilities and duties for the various training activities are defined in the appropriate implementing documents.

KPB-Business Group Manager

This position is responsible to the KPB-Site Vice President for providing general support to the entire Nuclear Departmentsite organization in key business related

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areas, including administrative support, budgeting and planning, supply chain, development of strategic issues and business plans, procedures and document control, information and records management and project management. Reporting indirectly to this position are the areas of Supply Chain and Information Technology, and information management. These areas of budgeting, supply chain, and information technology, receive direction from NMC corporate staff and support from WPSC corporate staff.

Procedures and Document Control – is primarily responsible for the administrative control and issuance of site implementing documents associated with OQAP activities for the Kewaunee Nuclear Power Plant.

Information and Records Management - is primarily responsible for receipt, maintenance, and overall control and storage of records associated with the Kewaunee Nuclear Power Plant.

Information Technology – is responsible for the general onsite computer support and services, including the site software configuration management program.

Supply Chain – is responsible for the onsite procurement process for materials and services for the Kewaunee Nuclear Power Plant. The Supply Chain organization is responsible for procurement engineering, warehousing and storage functions, and material control.

KPB-Assessment Manager

This position is responsible for the leadership and supervision of the Kewaunee Plant Assessment Group organization, which includes site Licensing, Corrective

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~~Action Program (Kewaunee Assessment Process), human performance Self Assessment / Process Improvement and Operational Experience Assessment activities programs. Also included are the Human Performance monitoring and Measurements/Performance Indicators. Reporting indirectly to this position are the areas of Regulatory Affairs (Licensing) and Self Assessment. The areas of Licensing/Regulatory Affairs and Self Assessment receive direction and support from NMC corporate staff.~~

~~KPB Training Manager Nuclear Training has been delegated the responsibility to develop, maintain, and provide employee training that meets the needs of the Kewaunee Nuclear Power Plant (KNPP). Nuclear Training is responsible for the accredited training programs as described in National Academy of Nuclear Training Document 91-016, The Process for Accreditation of Training in Nuclear Power Industry. Specific responsibilities and duties for the various training activities are defined in the appropriate directives and implementing procedures.~~

~~Security Manager This position is responsible for plant security and fitness for duty programs. Specific responsibilities and duties for the various protective service activities are defined in the appropriate directives and implementing procedures. The Security Manager is responsible to the NMC Director Security.~~

#### KPB Nuclear Oversight Manager

This position is responsible to the Director – Nuclear Oversight and indirectly to the Site Vice President for ensuring that an Operational Quality Assurance Program (OQAP) is developed, implemented, and maintained to meet the licensing requirements and management objectives. This position is responsible for final review of changes to the OQAP. ~~This position is responsible for review of directives~~

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~~which control activities affecting quality.~~ The KPB Nuclear Oversight Manager is independent of cost and scheduling considerations and has the authority and organizational freedom to identify quality problems, stop work on non-conforming activities associated with modifications (new construction) until deficiencies have been corrected; initiate, recommend or provide solutions, and verify implementation of corrective actions. The KPB Nuclear Oversight Manager maintains stop work authority for nonconforming activities associated with plant operations by reporting them to the ~~KPB Site Vice President.~~ Plant Manager. This position is responsible for ensuring that functions and activities of the Nuclear Oversight ~~(NO) S~~staff are controlled and performed in accordance with approved ~~directives~~ documents, which implement the requirements of the OQAP.

The Nuclear Oversight Manager shall as a minimum meet the requirements of ANSI N18.1-1971, and should have a minimum of a B. S. degree in Science or Engineering from an accredited college or university, a minimum of five years experience in power plant construction, engineering and/or plant operation, and a familiarity with codes and regulations.

The Nuclear Oversight ~~S~~staff has the responsibility for verifying the effectiveness of plant quality activities. The Nuclear Oversight ~~S~~staff is comprised of: Quality Control and Internal Assessment. Reporting indirectly to this position is the Supplier Assessment area.

Quality Control - Field is responsible for inspection activities, which includes but is not limited to, material receipt, QC hold points, NDE, and other activities normally associated with traditional quality control.

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Quality Assurance Internal Assessment - is responsible for programmatic reviews and observations of activities affecting quality to determine program effectiveness and assessments normally associated with quality assurance auditing.

Qualified Suppliers Assessment - Review and evaluations of is responsible for assessment (audit, survey or surveillance) of supplier quality assurance programs for qualification and use in procurement activities, including but not limited to, purchase requisition documents, vendor and manufacturer evaluations. This area reports directly to the NMC Manager Supplier Assessment.

The KPB Nuclear Oversight Manager shall as a minimum meet the requirements of ANSI N18.1-1971, and should have a minimum of a B. S. degree in Science or Engineering from an accredited college or university, a minimum of five years experience in power plant construction, engineering and/or plant operation, and a familiarity with codes and regulations.

Joint Offsite Review Committee (JOSRC)

JOSRC is responsible to the NMC Executive Vice President & CEO/CNO for review and audit/assessment of plant related matters concerning safety. The requirements for personnel, committee composition, meeting frequency, quorum and meeting records shall be as identified below and in accordance with the requirements of the JOSRC Charter. The Committee periodically reviews the results of the Nuclear Oversight Staff audit/assessments and is responsible for conducting reviews as part of the Independent Technical Review Program.

1. Function

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The JOSRC shall function to provide independent review and ~~audit~~ assessment of designated activities in the areas of:

- A. Nuclear Power Plant Operations
- B. Nuclear Engineering
- C. Chemistry and Radio-Chemistry
- D. Metallurgy
- E. Instrumentation
- F. Radiological Safety
- G. Mechanical and Electrical Engineering
- H. Quality Assurance Practices
- I. Other appropriate fields as determined by the Committee, to be associated with the unique characteristics of the nuclear power plant.

2. Composition

The JOSRC shall be composed of, but not necessarily limited to:

- A. At least three technically qualified persons who are not members of the plant staff.
- B. One member from the supervisory staff of the plant.
- C. At least two qualified non-company affiliated technical consultants.
- D. In-house staff management advisors as required.

The Committee membership and its Chairman and Vice Chairman shall be appointed by the NMC Executive Vice President & GEO-CNO. Each member of the JOSRC shall have an academic degree in an engineering or physical science field; and in addition, shall have a minimum of five years technical experience, of which a minimum shall be in one or more areas given in paragraph 1., "Function".

3. Alternates

Alternate members shall be appointed by the JOSRC Chairman, ~~upon approval by the NMC President & CEO~~, to serve on a temporary basis; however, no more than two alternates shall participate in JOSRC activities at any one time.

4. Consultants

Consultants may be utilized as determined by the Chairman - JOSRC to provide expert advice to the JOSRC.

5. Meeting Frequency

The JOSRC shall meet at least once every six months.

6. Quorum

A quorum of the JOSRC shall consist of the Chairman or Vice Chairman and four members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the plant.

7. Review

The JOSRC shall review:

- A. ~~Safety 10 CFR 50.59~~ evaluations for 1) changes to ~~procedures, equipment or systems~~ the facility or procedures and 2) tests or experiments completed under the provision of ~~10 CFR 50.59~~, not receiving prior NRC approval to verify that such actions did not ~~constitute an unreviewed safety question~~. require NRC approval.
- B. Proposed changes to ~~procedures, equipment or systems~~ which involve an ~~unreviewed safety question as defined in~~ the facility or procedures requiring prior NRC approval per 10 CFR 50.59.

- C. Proposed tests or experiments ~~which involve an unreviewed safety question as defined in~~ requiring prior NRC approval per 10 CFR 50.59.
  - D. Proposed changes in Technical Specifications or licenses.
  - E. Reports covering violations of applicable statutes, codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
  - F. Reports covering significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
  - G. Reports covering all Reportable Events.
  - H. Reports covering any indication of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
  - I. Reports and meeting minutes of the PORC.
8. Audits Assessments  
~~Audits~~ Independent assessments (audits) of plant activities shall be performed under the cognizance of the JOSRC. These ~~audits~~ shall include:
- A. Conformance of plant operation to the provisions contained within the Technical Specifications and applicable license conditions.
  - B. Performance, training, and qualifications of the entire plant staff.
  - C. Results of all actions taken to correct deficiencies occurring in plant equipment, structures, systems, or method of operation that affect nuclear safety.
  - D. Performance of all activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR Part 50.

- E. The Plant Fire Protection Program, implementing procedures and the fire protection and loss prevention program.
- F. Any other area of plant operation considered appropriate by the JOSRC or the NMC Executive Vice President & CEO/CNO.
- G. The Radiological Environmental Monitoring Program and the results thereof.
- H. The Off-site Dose Calculation Manual and implementing procedures.
- I. The Process Control Program and implementing procedures for processing and packaging of radioactive wastes.

9. Authority

The JOSRC shall report to the NMC Executive Vice President & CEO/CNO and shall advise the ~~President & CEO/CNO~~ on those areas of responsibility specified in paragraph 7, "Review" and paragraph 8, "~~Audits~~" "Assessments".

10. Records

Records of JOSRC activities shall be prepared, approved and distributed as follows:

- A. Minutes of each JOSRC meeting shall be approved by the OSRC Chairman and forwarded to the NMC Executive Vice President & CEO/CNO within 14 days following each meeting.
- B. Reports of reviews required by paragraphs 7.E through 7.H, shall be forwarded to the NMC Executive Vice President & CEO/CNO within 14 days following completion of the review.
- C. Reports of ~~audits~~ assessments performed by JOSRC shall be forwarded to the NMC Executive Vice President & CEO-CNO and to the

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management positions responsible for the areas ~~audited~~assessed  
within 30 days after completion of the ~~audit~~assessment.

### Plant Operations Review Committee (PORC)

PORC is responsible to the Plant Manager for providing advice on matters relating to nuclear safety at the plant. The requirements for personnel, committee composition, meeting frequency, quorum and meeting records shall be as identified below and in the PORC Charter. PORC is also responsible for conducting reviews as part of the Independent Technical Review Program.

1. Function

The PORC shall function to advise the Plant Manager on matters related to nuclear safety.

2. Composition

The PORC shall be composed of key supervisors of the on-site staff from the following disciplines: Operations, Maintenance, Instrument and Control, Reactor Engineering, Quality, and Radiological Protection.

3. Alternates

Alternate members shall be appointed in writing by the PORC Chairman to serve on a temporary basis; however, no more than two alternates for required members shall participate in PORC meetings at any one time.

4. Meeting Frequency

The PORC shall meet at least once per calendar month and as convened by the Chairman.

5. Quorum

A quorum of the PORC shall consist of the chairman (or his designated alternate) and a majority of the required members including temporary alternates.

6. Responsibilities

The PORC shall be responsible for:

- A. Review of operating, maintenance and other procedures including emergency operating procedures which affect nuclear safety as determined by the Plant Manager. Changes to those procedures are made in accordance with the provisions of TS 6.8.
- B. Review of all proposed tests and experiments that affect nuclear safety.
- C. Review of all proposed changes to the Technical Specifications.
- D. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- E. Review of all proposed changes to the Security Plan, Fire Plan, and their respective implementing procedures.
- F. Review all reports covering the investigation of all violations of the Technical Specifications and the recommendations to prevent recurrence.
- G. Review plant operations to detect potential safety hazards.

- H. Performance of special reviews and investigations and prepare reports thereon as requested by the Chairman of ~~Joint~~ Offsite Review Committee.
- I. Review of all Reportable Events.
- J. Review of changes to the Process Control Program, the Off-Site Dose Calculation Manual, and the Radiological Environmental Monitoring Manual.
- K. Review 10CFR50.59 evaluations to determine if prior NRC approval is required.

7. Authority

The PORC shall:

- A. Recommend to the Plant Manager approval or disapproval of items considered under preceding paragraphs 6.A through ~~6.E.~~
- ~~B. Make determinations with regard to whether or not each item considered under paragraph 6 constitutes an unreviewed safety question.~~
- GB. Provide prompt notification in the form of draft meeting minutes to the Site Vice President and the Chairman ~~Joint~~ Offsite Review Committee of disagreement between the PORC and the Plant Manager. The Plant Manager shall have responsibility for resolution of such disagreements.

8. Records

Minutes shall be kept of all meetings of the PORC and copies shall be sent to the ~~KPB~~ Site Vice President and the Chairman ~~Joint~~ Offsite Review Committee.

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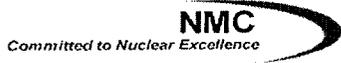
## QUALITY ASSURANCE TYPING COMMITTEE

This Committee is responsible to the ~~KPBSite~~ Engineering Manager ~~Director~~ for changes to classification of systems, structures and components within the nuclear power plant according to the importance of the function they serve with respect to plant safety and operability. The description of the committee's duties and authority shall be established in ~~various directives~~ implementing documents and the QA Typing Committee Charter.

## 2.0 QUALITY ASSURANCE PROGRAM

### 1. General

The Operational Quality Assurance Program complies with the requirements of 10CFR50, Appendix B, the provisions of ANSI N18.7-1976 and the Regulatory Guides which endorse the daughter standards required by ANSI N18.7-1976 with the exceptions, interpretations, and qualifications noted in Appendix A of this description. The requirements of the OQAP apply to those activities which affect the quality of structures, systems or components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. All structures, systems, and components are classified as QA Type 1, 2, 3 or N according to their function and importance in relation to the safe operation of the reactor, with emphasis on the degree of integrity required to protect the public. The OQAP requirements are mandatory for all QA Type 1 items. QA Type 2 and 3 items, as determined by management, may require special control and an "X" modifier may be added to the QA2 or QA3 type designation. All components and/or systems which are identified as Nuclear Safety Design Class I in the Updated Safety Analysis Report (USAR) shall be categorized as QA Type 1. All nuclear fuel and core components shall be categorized as QA Type 1. The

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definitions and a list of the ~~Safety Class I, II and III~~ Nuclear Safety Design Classes for major structures, systems and components are found in the Kewaunee USAR Appendix B, 2 and Table B.2-1.

During construction, QA types were established for plant equipment by a QA typing committee. The QA types for equipment subsequently added to the plant are established by the Responsible Engineer who installs the equipment under the Plant Physical Change program. The Plant Physical Change program exists under the requirements of the OQAP. Therefore, the QA types of equipment added since construction are controlled under the OQAP and its definitions. A change to an established QA type must be approved by the QA Typing Committee.

## 2. Requirements

It is mandatory for applicable employees to comply with the OQAP. It is the responsibility of the management charged with the implementation of the program to inform personnel working for them that the quality policies, OQAP manual, and procedures have mandatory requirements which must be implemented and enforced. ~~The KPB Training Manager is~~ Managers are responsible for conducting training sessions as necessary to keep individuals informed of policies and changes to the OQAP. The lesson plans for these training sessions will be prepared under the cognizance of the Nuclear Oversight ~~S~~staff.

The OQAP shall be applied to all activities affecting safety-related functions and include: physical changes, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, modifying, engineering, and training. The control over these activities shall be applied to an extent consistent with their importance to safety and shall

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take into account the need for special controls, processes, tests, equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection, evaluation, or test.

### 3. **Structure**

The OQAP manual is the top level quality program document for operational phase activities. The OQAP is a manual which incorporates the requirements of 10CFR50 Appendix B, the provisions of ANSI N18.7-1976 and ANSI N45.2.23-1978 and Regulatory Guides 1.8-Rev. 1, 1.30, 1.37, 1.38-Rev. 2, 1.39-Rev. 1, 1.54, 1.58-August, 1973, 1.64-Rev. 2, 1.74, 1.88-Rev. 2 and 1.94. The requirements and responsibilities identified by the manual are implemented through implementing documents, such as, directives, procedures, and instructions, which prescribe activities affecting quality. ~~Technical reviews of directives are provided by department heads or process owners. Knowledgeable personnel other than the originator, provide technical reviews of implementing documents. Review of Nuclear Administrative Directives, and Fuel Management Directives for consistency with the OQAP is provided for by the KPB Nuclear Oversight Manager.~~

~~Nuclear administrative directives~~ implementing documents are reviewed for consistency with the OQAP and approved by the appropriate responsible Director/Manager, or designee. These ~~directives~~ implementing documents are prepared to govern activities affecting quality, such as physical changes, procurement, licensing, training, document control, operation, procedure control, material control, maintenance, and other related activities.

~~Fuel Management Directives~~ implementing documents for fuel management are reviewed and approved by the Project Manager – Kewaunee/Point Beach and are

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prepared to govern fuel management activities affecting quality, such as fuel procurement, reactor core performance and analysis, core design, and other related activities.

**4. Management Review**

Management above or outside the Nuclear Oversight organization shall routinely be informed of the status and adequacy of the OQAP. Audits/Independent assessments (audits) of implementing directives/documents shall be conducted to verify conformance to the program. Nonconformances or differences of opinion, which cannot be settled between Nuclear Oversight and the department involved shall be brought to the attention of upper management for resolution.

**5. Indoctrination and Training**

A training program shall be established in order to provide for developing and maintaining a staff qualified to operate, maintain and provide the necessary technical support. The indoctrination and training program shall provide for:

- A. Training personnel responsible for performing quality-affecting activities as to the purpose, scope and implementation of the quality-related manuals, instructions, and procedures.
- B. Establishing the scope and depth of indoctrination and training to be provided commensurate with the level of quality-affecting activities being performed by an individual.
- C. Training personnel who perform quality-affecting activities in the principles and techniques of the activity being performed.
- D. Training and retraining on an as-needed basis to maintain a level of quality commensurate with the quality-affecting activity being performed.

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- E. Maintaining records of training sessions, attendance and content of the training session.

### 3.0 DESIGN CONTROL

Modifications to systems that are nuclear safety related, or as described in the USAR, and considered significant for nuclear safety shall be controlled by a Plant Physical Change Program established by ~~directives~~implementing documents to ensure compliance with the existing design and the requirements of 10CFR50.59. ~~Directives shall be prepared~~Administrative controls shall be described in implementing documents to augment the following aspects of the Plant Physical Change Program:

1. Establish the structure, authority and responsibilities of the groups or positions involved in design change activities.
2. Correctly translate design inputs into specifications, drawings, procedures, or instructions.
3. Identify and select the appropriate quality standards in design documents.
4. Select and review the suitability of materials, parts, equipment and processes essential to the safety-related functions of the structure, system, or component.
5. Assure that computer software, which is an integral part of the operation of equipment, is designed, documented and tested adequately.
6. Assure the change is subject to at least the same measures applied to the original design, and provide for a second level review.
7. Assign the responsibilities of all organizations involved in the Plant Physical Change process, both internal (KNPP) and external (contractor, vendor) and

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ensure a method of exchanging technical information across internal and external interfaces.

~~PORC shall be responsible for reviewing proposed changes or modifications that affect nuclear safety. JOSRC shall review the safety evaluation of changes completed under the provision of 10CFR50.59 to verify that such actions do not constitute an unreviewed safety question.~~

#### 4.0 PROCUREMENT DOCUMENT CONTROL

Measures shall be established in ~~directives~~ implementing documents to provide for the preparation of procurement documents to ensure that applicable regulations, design bases, and other QA program requirements are included or referenced. Procurement documents shall include, as appropriate: the scope of work; technical requirements; documentation requirements; requirements for hold and witness points; the allowance for access to supplier's facilities for review or audit of documentation or manufacturing procedures; and requirements that the supplier has a documented QA program in accordance with 10CFR50, Appendix B which includes a means for disposition of nonconformances.

The ~~directives~~ implementing documents shall include measures to ensure that procurement documents are reviewed and approved by qualified and authorized personnel prior to release. The ~~directives~~ implementing documents shall also provide assurance that the procurement document review includes a verification that quality requirements are stated in such a manner, that through ~~either~~ source surveillance and inspecting, supplier ~~audits,~~ assessments, or receipt inspection, the quality of the procured items may be verified.

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## 5.0 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Measures shall be established in appropriate ~~directives~~ implementing documents to control the preparation, format, content, and use of operating, test and maintenance procedures, and approvals for same. When required, they shall be prepared in sufficient detail to provide adequate guidance in performing activities affecting quality. ~~These procedures~~ Implementing documents shall include, as appropriate, initial conditions, step-by-step instructions, sign-off steps, acceptance criteria, etc., to ensure that activities affecting quality have been satisfactorily completed.

A Plant Physical Change Program shall be established by ~~directives~~ through implementing documents to assure that instructions, procedures, and drawings are used, where appropriate, to control activities associated with the modification of safety systems described in the USAR. These implementing directives ~~documents~~ shall establish a method to update drawings, procedures, and other technical documents associated with the plant modification.

## 6.0 DOCUMENT CONTROL

The generation, distribution, and revisions of documents that establish specifications or activities affecting quality shall be controlled by ~~formal directives~~. ~~These directives~~ through implementing documents. These implementing documents shall provide for the following document control measures:

1. Identification of individuals or organizations responsible for preparing, reviewing, approving, and issuing documents and revisions, thereto.

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2. Identifying and providing the proper documents to be used in performing safety-related activities.
3. Establishing distribution.
4. Establishing a method of providing up-to-date documents to the controlled files.

## 7.0 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

Suppliers of material, equipment and services, including suppliers of spare or replacement parts, shall be selected based on an evaluation of the supplier's capability to provide the purchased items or services in accordance with the requirements of the procurement documents. ~~Directives~~ Implementing documents shall include methods for source evaluation and selection. One or more of the following considerations shall be included for source evaluation: evaluation of the supplier's history of providing a product which performs satisfactorily in actual use; review of industry directories; review of whether the prospective supplier has a quality assurance program reviewed and inspected by the NRC under the Vendor Inspection Program; review of whether the prospective supplier has been recently audited by NUPIC (Nuclear Utilities Procurement Issues Committee) or similar third party inspection publication; review and evaluation of the supplier's Quality Assurance Program, Manual and Procedures, and the supplier's design and manufacturing capability; and a NMC survey of the prospective supplier's technical and quality capability by directly evaluating his facilities, personnel and the implementation of his quality assurance program.

A Qualified Suppliers ~~System~~ List shall be established and maintained by ~~directives~~ through implementing documents developed under criteria imposed by the

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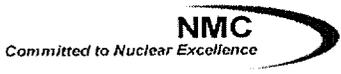
Operational Quality Assurance Program. Material, equipment, or services purchased from suppliers not on the Qualified Suppliers System List shall undergo a review and evaluation to ensure conformance to the acceptable criteria established by the Quality Assurance Program. Directives implementing documents shall also establish control measures to ensure that documentary evidence of the conformance of material and equipment to procurement requirements is available prior to installation or use.

## 8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

Controls established for procurement shall ensure that safety-related materials, parts, and components are purchased under the requirements and documentation established by the Operational Quality Assurance Program. Implementing directives shall provide for a documented receipt and inspection of incoming material and equipment, along with providing a system for identifying the status of acceptable items to ensure use and installation of only correct and acceptable materials. Identification and traceability of safety-related materials, parts, or components from issuance to installation within the plant shall be provided by this system.

## 9.0 CONTROL OF SPECIAL PROCESSES

Special processes including welding and non-destructive examination shall be accomplished under controlled conditions by qualified personnel, in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

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The Operational Quality Assurance Program is established to ensure compliance and implementation of these requirements.

## 10.0 INSPECTION

Concerning material receipt, ~~directives implementing documents~~ shall establish a receipt inspection under the control of the ~~KPB~~ Nuclear Oversight Manager, which provides for visual examination, receipt of required documentation, verification of identification, and on-site technical inspection.

Concerning modifications, the Plant Physical Change Program provides for the following requirements: special processes, test, measuring and test equipment, and cleanliness. The work package shall be reviewed by site Nuclear Oversight personnel who have been appropriately trained to ensure that the required special installation procedures are included in the package or properly referenced. Verification of conformance to established requirements shall be performed by individuals or groups who do not have direct responsibility for performing the work being verified. Personnel or groups assigned responsibility for verification of inspection or testing shall be delineated in appropriate ~~procedures and directives implementing documents.~~

Plant personnel performing inspection, examination, and testing functions which are associated with normal operations of the plant and certain technical reviews normally assigned to the on-site operations organization shall be qualified to ANSI N18.1-1971.

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Plant personnel who will be performing inspection, examination, and testing functions which are not associated with normal operations of the plant shall be trained and qualified in accordance with the requirements of Regulatory Guide 1.58, "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel", and 10CFR50.55a, Subsection g, "Inservice Inspection Requirements", which endorse, with specific exceptions, ANSI N45.2.6-1973, "Qualifications of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants", except that QA experience cited for levels I, II, and III shall be interpreted to mean actual experience in carrying out the type of activity being performed. Nuclear Oversight personnel will be qualified to these references with the noted exceptions. Non-plant personnel who perform plant inspections, examinations and testing shall be trained and qualified in accordance with the above stated paragraph.

Additionally, this also applies to contract personnel working under the site OQAP. Suitable review and acceptance must be made for qualification to other revisions or other standards the contractor's program may specify. Training of personnel performing activities affecting quality shall be conducted to ensure that suitable proficiency is achieved and maintained.

## 11.0 TEST CONTROL

A preoperational test program was conducted to demonstrate that structures, systems, and components would perform up to quality standards. A continuing operational test program is being conducted in accordance with Technical Specification surveillance requirements to ensure the operability of safeguard and safety-related structures, systems, and components. ~~Plant directives and~~

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~~procedures~~ Implementing documents shall provide for the prerequisites, evaluation, and documentation of these test results.

When required, the Work Request Order and Plant Physical Change Program shall provide for the testing and evaluation of test results for replacement, repaired, or modified structures, systems, or components.

## 12.0 CONTROL OF MEASURING AND TEST EQUIPMENT

Measuring and test equipment and reference standards (calibration standards) used for measurements, tests and calibration respectively, shall be of the proper range and type and shall be controlled, calibrated and adjusted, and maintained at specified intervals or prior to use to assure the necessary accuracy of calibrated devices. The referenced standards used shall have an accuracy range and stability which are adequate to verify that the equipment being calibrated is within required tolerance. The reference standards used shall be adequate for the requirements of the equipment being calibrated, shall be recertified against higher level equipment of closer tolerance, and shall be traceable to nationally recognized standards. The method and interval of calibration for measuring and test equipment and reference standards shall be specified and shall be based on the type of equipment, its characteristics and other conditions affecting calibration. When measuring and testing equipment or reference standards are found to be out of calibration, an evaluation shall be made of previous inspections and test results and acceptability of the items previously inspected.

## 13.0 HANDLING, STORAGE, AND SHIPPING

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~~Nuclear administrative directives~~ Implementing documents shall provide a system for material and equipment handled at and shipped from the plant to prevent damage, deterioration or loss. Where necessary, for sensitive or high value items, specific written instructions or procedures will be utilized. Where necessary, special handling tools and equipment will be utilized.

~~Directives~~ Implementing documents shall provide for special provisions for the control of items which might cause risk to the general public if damage should occur.

~~Directives~~ Implementing documents shall also provide a system for controlling material during storage to prevent damage, loss, deterioration, or environmental damage. Housekeeping practices shall be controlled to prevent degradation in item quality.

#### 14.0 INSPECTION, TEST, AND OPERATING STATUS

The measures required in ~~this~~ these criteria are applied to two general categories, material control and operational control. Inspection, test, and operating status provided by the material control program is implemented through ~~plant directives~~ implementing documents which are controlled by the ~~Nuclear Oversight~~ responsible organizations. Operational control, including the status of inspections, tests, and operations activities is described in ~~plant directives~~ implementing documents which are controlled by the Operations and ~~Planning and~~ Outages & Scheduling organizations. All changes in procedures for these categories are reviewed by management. If the need for bypassing of a

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required inspection, test, or other critical operation occurs, it shall be procedurally controlled and reviewed by management.

1. Material Control

A receipt inspection at the plant site shall identify the status of acceptable items and shall provide for the control of uninspected and nonconforming items to ensure use and installation of only correct and acceptable materials. Physical identification shall be used to the maximum extent possible to identify the status of materials inspected. The system shall provide for documentation traceable to the item and segregation and disposition of nonconforming items to preclude misuse.

2. Operational Control

The work control program shall include provisions for taking equipment out of service, identification of that equipment, and precautions or prerequisites for returning that equipment to service. The work ~~request~~order and supplemental documents shall be reviewed by Nuclear Oversight personnel to ensure that special processes, inspection (hold and witness points) and testing requirements are adequately specified. They are also reviewed by operations personnel to determine the effect on plant operations, the proper tagging out of service of equipment, and the protection of personnel and equipment.

**15.0 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS**

When a nonconforming item is identified during a receipt inspection, the condition shall be documented on a ~~Material Nonconformance Report~~ in accordance with

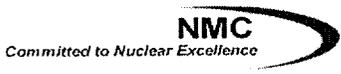
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approved implementing documents and the item identified or segregated to preclude misuse, further processing, or installation pending disposition. Material ~~Nonconformance Reports~~ nonconformances will ~~shall~~ be controlled and evaluated by cognizant plant personnel for the determination of the disposition of nonconforming items. Material ~~Nonconformance Reports~~ nonconformances and dispositions shall be submitted to the responsible organization for implementation of corrective action. Provisions shall be established to ensure that items dispositioned as "repair" or "rework" shall ~~be~~ are reinspected and require documentation verifying the acceptability of the item prior to release for use.

## 16.0 CORRECTIVE ACTION

Conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective materials and equipment (post-receipt inspection), and nonconformances shall be documented and reported in accordance with approved procedures. These reports provide the mechanism for all personnel to notify management of conditions adverse to quality. Measures shall be provided for the prompt processing of these reports to ensure expeditious investigation, evaluation, and implementation of corrective action. For situations determined to be significantly adverse to quality, investigations shall not only provide for identifying and correcting the condition, but also for determining the cause of the condition to ensure that corrective action is taken to preclude its recurrence.

Measures shall be established to ensure that reports of conditions adverse to quality are promptly prepared and reviewed for events, which may be potentially reportable to the NRC. These reports shall be evaluated by management for safety implications and Technical Specifications violations. The system shall provide for

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determination of corrective action to be taken, implementation of the corrective action, and final close out.

Measures shall be established in appropriate ~~directives and Quality Procedures~~implementing documents to document and control ~~audit~~independent assessment (audit) findings. These measures shall include a description of the unacceptable condition, corrective action to be taken, response time, verification of implementation of appropriate corrective action, and close out of the deficiency generated as a result of ~~audits~~. ~~These findings shall be documented in accordance with approved procedures.~~independent assessments. Corrective action taken for ~~audit~~these findings shall be reviewed and verified. Disagreement between Nuclear Oversight and the ~~audited~~assessed organization regarding corrective action shall be pursued through responsible management with the final authority resting with the Site Vice President.

Technical deficiencies and recommendations generated during technical reviews shall be documented with the report. Technical deficiencies and recommendations shall be submitted to the appropriate Manager for disposition as deemed necessary.

## 17.0 QUALITY ASSURANCE RECORDS

~~Directives~~Implementing documents shall be prepared to control records that are generated during the operation of the Kewaunee Nuclear Power Plant. These ~~directives~~implementing documents shall identify the types of records that are to be controlled including requirements for storage.

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Records shall be primarily maintained in the KNPP ~~QA~~Records Vault, the main records storage facility, or another facility satisfying the permanent record storage requirements of the QA program. Frequently used records, not stored in the KNPP ~~QA~~Records Vault shall be maintained in accordance with procedures, which provide for proper control and protection of the records. Records may be maintained using microfilm, optical disk, or other approved technology provided appropriate quality control provisions have been established in the controlling procedures.

Records shall be kept for the prescribed periods of time in accordance with the requirements of Technical Specifications or Regulations. ~~Directives~~Implementing documents shall provide for a system that permits the retrieval of information in a reasonable amount of time.

## 18.0 AUDITS

~~Audits~~Independent assessments (audits) shall be conducted utilizing performance-based methods in accordance with appropriate ~~directives, procedures, or instructions~~implementing documents to verify that the requirements of the QA program are being implemented. ~~Audits~~Independent assessments shall be conducted on, but not limited to, power plant operating and maintenance activities, engineering staff activities, ~~Fuel Management activities, Purchasing Department~~fuel management activities, procurement and material control activities, and ~~Supplier~~supplier activities. A comprehensive system of planned and documented ~~audits~~independent assessments shall be carried out to verify compliance with all aspects of the administrative controls and quality assurance program. ~~Audits~~Independent assessments of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance

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and in such a manner as to assure that an ~~audit~~independent assessment of all safety-related functions is completed within a period of two years. A ~~quality assurance~~An independent assessment program has been developed to ~~cover the auditable portions~~assess the implementation of the Technical Specifications during planned and emergent performance based assessments. over a five year interval.<sup>1</sup>

~~Audits~~These assessments shall be performed by experienced personnel trained, in accordance with ANSI N45.2.23-1978, and independent of any direct responsibility of the activity being ~~audited~~assessed.

Preparation of ~~procedures for audits, assessments, documentation of audit findings, and issuance of audit/assessment reports~~ shall be described by ~~applicable directives or procedures. Supervisory~~in implementing documents. Responsible personnel of the ~~audited/assessed~~ activity shall review the ~~audit report~~results and provide corrective actions. Follow-up action shall be provided ~~for by the QQAP~~ to ensure that corrective action is implemented and adequate.

<sup>1</sup> ~~Letter from C. W. Giesler (WPSC) to J. F. Streeter (NRC) dated August 22, 1983.~~

<sup>2</sup> ~~Letter from R. L. Spessard (NRC) to C. W. Giesler (WPSC) dated September 30, 1983.~~

## **APPENDIX A**

### **ANSI N18.7-1976 EXCEPTIONS, INTERPRETATIONS, QUALIFICATIONS**

#### **General**

ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants" is adopted to provide a basis for establishing an operational quality assurance program that meets the requirements of 10CFR50 Appendix

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B. This standard provides an acceptable means to satisfy the criteria of 10CFR50 Appendix B, but does not limit the use of alternate means to ensure safe operation of the plant. In this regard, those portions of this standard to which exceptions, interpretations and/or qualifications are taken are listed below.

Standards in general present objectives to be met with the method of implementation left general enough to provide for various interpretations for implementation. In the review of the program in accordance with the adoption of these new standards, many changes in implementation have been made. Where questions of interpretation were raised a conscientious interpretation has been formalized with the Nuclear Oversight staff. Wherever future questions of interpretation arise they will be decided in a similar manner with continued disagreement being brought before corporate management for resolution.

When a short term or one time contradiction to the program is discovered, a non-conformance action will be taken within the Nuclear Oversight organization to ensure a conscientious effort to maintain a quality level equivalent to the safety significance of the activity involved. When a long term or permanent contradiction to the program exists, a program change shall be implemented providing the same level of review as the adoption of this program, and the change will be submitted to the NRC.

Finally, wherever Technical Specifications overlap or contend with the administrative controls provided for in this program, the Technical Specifications will take precedence.

## **PARTICULAR EXCEPTIONS AND QUALIFICATIONS**

### **ANSI N18.7-1976**

#### **Section**

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**3.1** Administrative controls shall be established necessary to comply with this standard as adopted, with the exceptions, interpretations, and qualifications addressed in this transmittal.

**5.2.2** This section requires that temporary changes, which clearly do not change the intent of approved procedures, shall as a minimum be approved by two members of the plant staff knowledgeable in the areas affected by the procedures. At least one of these individuals shall be the supervisor in charge of the shift and hold a senior operator license on the unit affected. Kewaunee Technical Specification 6.8.b does not require the licensed senior reactor operator to be the individual in charge of the shift.

**5.2.7.2** This paragraph requires that design activities associated with modification of safety-related structures, systems, and components shall be accomplished in accordance with ANSI N45.2.11-1974. We will commit to apply this standard to those design activities which we deem are comparable in nature and extent to similar construction related activities, the provisions of which shall be employed as applicable to the degree of importance to safety for the design project under consideration. We shall also adopt the Regulatory Position of Regulatory Guide 1.64, Rev. 2, June 1976, as requested with an exception to position C.2. We will follow our existing practice that design verification should not be performed by the originator's supervisor, except where expertise is not available other than the supervisor immediately responsible for the design.

**5.2.9** This section requires that procedures be developed to supplement features and physical barriers designed to control access to the plant and, as appropriate, to vital

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areas within the plant. Plant security and visitor control measures are implemented in accordance with the Kewaunee Security Manual, required by 10 CFR 50.34(c).

**5.2.12** This section specifies that ANSI N45.2.9-1974, "Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants", shall be used for management of plant records during the operational phase. Compliance with the provisions of this standard and the Regulatory Position of Regulatory Guide 1.88, Rev. 2, October 1976, shall be deemed applicable to the nature and scope of the work being performed and the importance of the item or service involved with the exceptions noted below.

**5.2.15** This section requires that plant procedures, which govern safety-related activities, shall be reviewed 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. KNPP has alternate programs in place that make a biennial review process unnecessarily duplicative. These alternate programs ensure procedures are periodically reviewed and maintained current when pertinent source material is revised, plant physical changes are made, and/or any deficiencies occur. KNPP will also implement measures specifying that infrequently scheduled plant procedures that have not been used or reviewed for two years should be reviewed before use. Due to the significance of the Integrated Plant Emergency Operating Procedures (IPEOP's), the biennial review of the IPEOP's will be continued. Alternate programs in place include the following:

1. Technical Specification revision process

This process includes a review of affected plant procedures upon the approval of a Technical Specification Amendment and subsequent revisions as appropriate.

2. Physical Change Program

~~Nuclear department heads~~Affected site organizations are notified of modifications and are requested to review affected plant procedures. Revisions to procedures are verified as part of the Physical Change closeout process.

3. Various Self-Assessment Programs

During self-assessment activities, procedures may be identified that contain significant discrepancies. Revisions are made as appropriate.

4. ~~Kewaunee Assessment Process (KAP)~~Corrective Action Program

Any procedures identified as being in need of revision during the ~~KAP~~corrective action evaluation process are revised before the ~~KAP~~ corrective action is closed out.

5. Quality Assurance Program

At least every two years, a surveillance will be performed whereby randomly selected safety-related procedures would be checked for added assurance of timely revision of procedures.

6. Operating Experience Assessment Program

During operating experience assessment activities, procedures may be identified that contain significant discrepancies or require change. Revisions

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are made as appropriate. Significant changes to vendor manuals are evaluated as part of this program.

**ANSI N45.2.9-1974**

**Section**

**4.3 & 4.4 Concerning Receipt Control.**

The Records Management Group has been designated as the group responsible for receiving and storing records. This staff does not control which records are sent to them, however, there is a record index system identifying which records are under the control of the QA Program. We have assigned responsibility for assuring QA records are retained in the ~~KNPP QA Vault~~accordance with QA Program commitments to the various department heads or process owners. Also there is no log of incoming records. However, the previously mentioned index is kept up to date and serves as a list of records received and retained. We have a procedure, which partially covers the receipt control of records but none specifically for this action. We do not plan at this time to implement any further controls on the receipt of records.

**ANSI N45.2.9-1974**

**Section**

**5.6 Concerning Permanent and Temporary Storage Facilities.**

Criteria specified in this paragraph for those records stored in the ~~KNPP QA Vault~~single record storage facilities are met; however, the use of temporary storage facilities, the definition of a working QA document and the transport of QA records to the ~~vault~~permanent storage differ.

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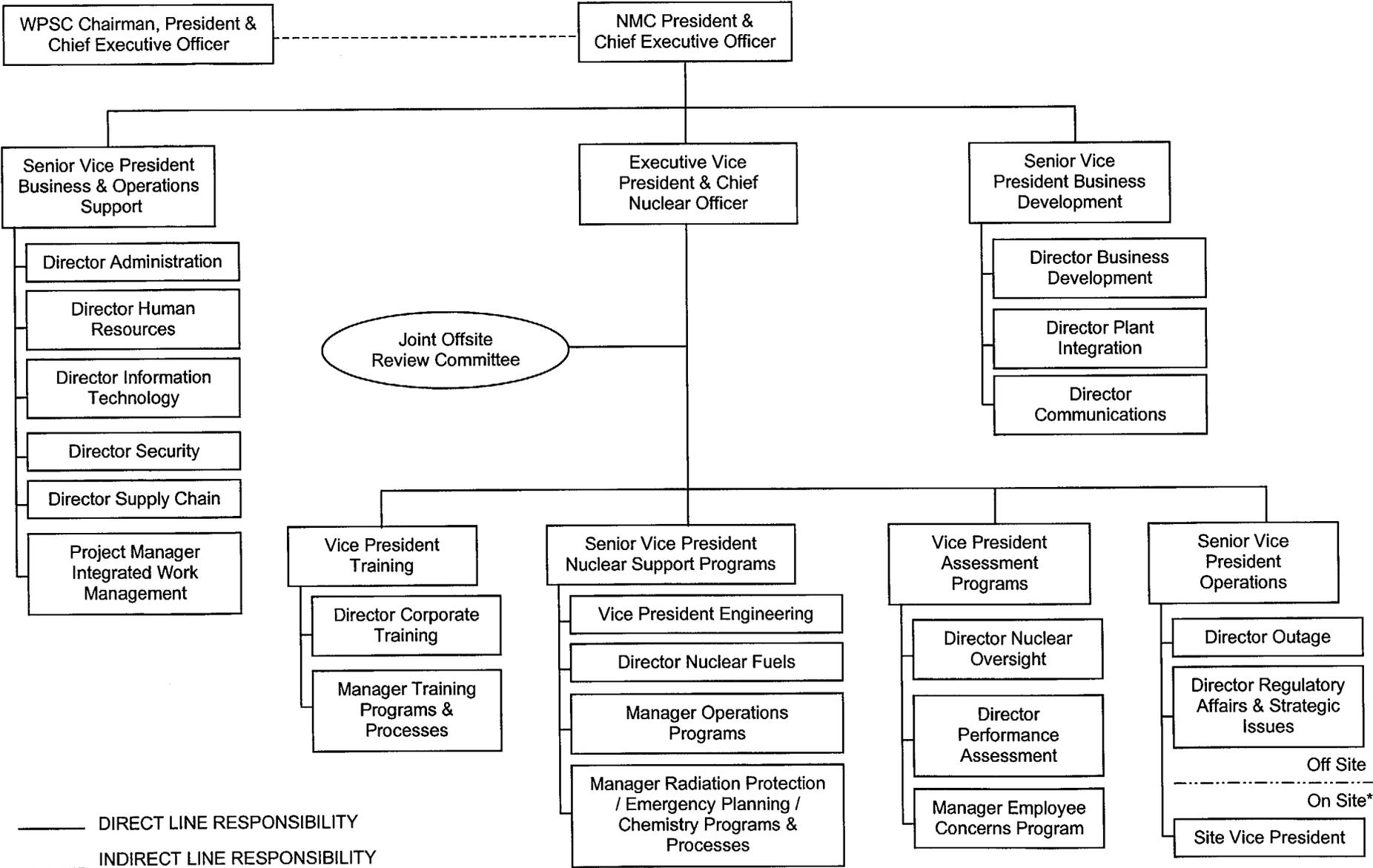
Several in-house generated QA documents/records are maintained in working files, e.g., JOSRC Meeting Minutes, training records and radiological survey data. These documents/records which we feel are working documents until no longer used on a routine basis are kept in locked, fire-proof file cabinets and are periodically transferred to the ~~KNPP QA Vault~~ permanent storage facilities. Duplication or filing in the ~~vault~~ permanent storage facility would be unacceptable due to the quantity and frequent use of these documents.

We find our handling of these documents acceptable due to the relative short duration of filing in temporary quarters and relative insensitivity of these documents to the safety of the plant. Finally, we do not have a courier service to immediately transfer a QA record just completed to the ~~vault~~ permanent storage facilities. Some records are transferred by personal delivery and others through the routine in-company mail service. At this time we do not plan to implement any further controls on transferring documents to the ~~KNPP QA Vault~~ permanent record storage facilities.

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OQAPD Section No. 1 (Rev. 22)

Figure 1 - NMC OFFSITE FUNCTIONAL QUALITY ASSURANCE ORGANIZATION

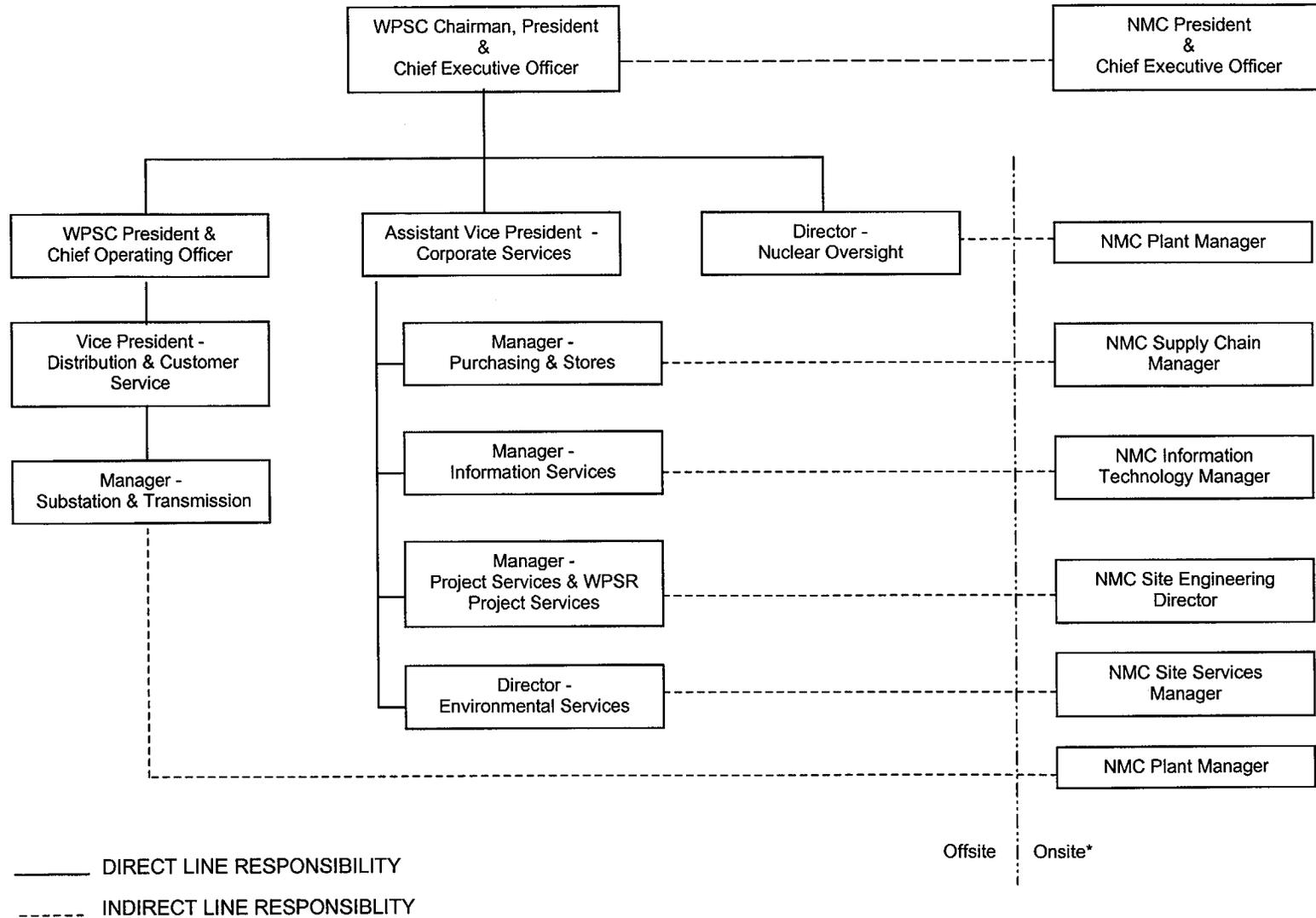


\* Located at Kewaunee or Point Beach Nuclear Power Plant Sites

(Figure 2 is not shown with revision lines or strikeouts)

QQAPD Section No. 1 (Rev. 22)

Figure 2 - WPSC OFFSITE FUNCTIONAL QUALITY ASSURANCE ORGANIZATION



\* Located at Kewaunee or Point Beach Nuclear Power Plant Sites

(Figure 3 is not shown with revision lines or strikeouts)

QQAPD Section No. 1 (Rev. 22)

Figure 3 - NMC ONSITE FUNCTIONAL QUALITY ASSURANCE ORGANIZATION

