



TO: NRC Wash. CONTROLLED DISTRIBUTION NO. 53

FROM: LACBWR Plant Manager

8/26/2005

SUBJECT: Changes to LACBWR Controlling Documents

I. The following document(s) has been revised:

**LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD),
Revision 19**

Instructions:

Remove and replace Statement of Quality Assurance Policy

Remove and replace Section I (pages 3-12)

Remove and replace Section IV (pages 18-19)

Remove and replace Figure 2 (page 55)

NOTE: 10 CFR 50.54(a) allows for distribution of QAPD revisions without written NRC approval, after a 60-day waiting period. Since a time period of at least 60 days has elapsed since submittal of this revision, with no NRC response having been received, no acceptance letter is included with this distribution.

- The material listed above is transmitted herewith. Please verify receipt of all listed material, destroy superseded material, and sign below to acknowledge receipt.
- The material listed above has been placed in your binder.
- Please review listed material, notify your personnel of changes, and sign below to acknowledge your review and notification of personnel. [To be checked for supervisors for department specific procedures and LACBWR Technical Specifications.]
- The material listed above has been changed. [To be checked for supervisors when materials applicable to other departments are issued to them.]

NMSS01

/S/ _____ DATE _____

Please return this notification to the LACBWR Secretary within ten (10) working days.

A Touchstone Energy® Cooperative 

DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR

STATEMENT OF QUALITY ASSURANCE POLICY

The Quality Assurance Program described herein has been developed by Dairyland Power Cooperative (DPC) to assure safe and reliable operation of the La Crosse Boiling Water Reactor (LACBWR) in a SAFSTOR condition. This program is designed to meet the requirements of Title 10 of the Code of Federal Regulations, Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," as it would apply to a possession-only condition.

The Quality Assurance Program applies to all activities affecting the functions of the structures, systems, and components that are associated with a possession-only license using a graded approach. These activities include design, operations, maintenance, repair, fuel handling, testing and modifications. Design and fabrication of shipping casks used for shipment of radioactive material will not be conducted under this Quality Assurance Program.

The DPC Quality Assurance Group Supervisor is responsible for the establishment of a Quality Assurance Program which meets the requirements of 10 CFR 50, Appendix B, and implementation of the program.

William L Berg
(President & CEO)

May 26, 2005
(Date)

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION 1	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 1 OF 10
REVD: <u>David J. Egg</u> 5/19/05 QA Supervisor Date	APPROVED:	
REVD: <u>A. S. Chutkan</u> 5/19/05 Plant Manager Date	<u>William L Berg</u> 5/26/05 President & CEO Date	

I. **ORGANIZATION**

A. **General Requirements**

Figure I shows the organizational structure for the LACBWR facility and establishes the functional lines of authority and responsibility of various groups and individuals participating in the LACBWR QA Program. The authority and duties of persons or groups responsible for the direction, implementation, and auditing of this program are as follows:

1. **DPC President & CEO** has corporate responsibility for all quality assurance matters relating to design, construction, installation, maintenance, and testing of the LACBWR facility. He has delegated the authority and responsibility for administration of quality assurance for LACBWR to the DPC QA Group Supervisor.
2. **Vice President (VP), Generation Division**, reports directly to the President & CEO and has corporate responsibility for the administration and operation of the LACBWR facility.
3. **LACBWR Plant Manager**, who reports directly to the VP, Generation, has on-site responsibility for the possession-only (SAFSTOR) condition of the facility within the limits set forth in the Decommissioning Plan and Technical Specifications. He has responsibility for implementing the quality assurance requirements at the plant, through administrative control procedures and procedures required to fulfill the requirements of this program. All activities pertaining to the LACBWR plant are coordinated through the Plant Manager. Activities performed by outside individuals or groups, including SRC, outside consultants, and representatives of NRC activities, with regard to the LACBWR plant are performed under the authority and responsibility of the Plant Manager.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION I	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 2 OF 10

The Plant Manager has complete overall technical and administrative control over the groups designated in the organizational chart for the facility.

The Plant Manager directly supervises and coordinates all activities related to possession-only operation and maintenance of the facility through the Shift Supervisors and coordinates the activities of the maintenance departments. The Plant Manager ensures that regular inspections of the facility are performed, and he is responsible for the review of all log sheets, malfunction reports, surveillance, and maintenance records. The Plant Manager is concerned with the detailed operation and maintenance of the facility. The Plant Manager enforces all facility operating and safety procedures and ensures that approved operating and maintenance procedures are followed.

4. Training Supervisor reports directly to the Plant Manager and has responsibility for establishing and implementing a training and requalification program for operators in accordance with applicable regulations.
5. Security Supervisor reports directly to the Plant Manager, with access to the DPC President & CEO if necessary for security matters, and is responsible for implementation and administration of the LACBWR Physical Security Program. The Security Supervisor is responsible for the day-to-day administration of the security organization.
6. Quality Assurance Group Supervisor (QA Supervisor) reports directly to the Director, Generation Support Services, with access to the DPC President & CEO if necessary for regulatory matters. He has responsibility for establishing a quality assurance program and performing audits of the program to determine its effectiveness. The QA Supervisor has the authority to stop fabrication, installation, or testing of structures, systems, or components that do not conform to specifications or approved procedures.
7. Quality Assurance Department Personnel report directly to the QA Supervisor and are responsible for assuring that the activities required by the QA Program are implemented.
8. Director, Generation Support Services, reports directly to the VP, Generation Division, and has corporate oversight of the QA Department.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION I	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 3 OF 10

9. Administrative Assistant reports directly to the Plant Manager and is responsible for maintenance of LACBWR's QA records, procedures, and indexes.
10. Administrative Secretary reports directly to the Administrative Assistant and is responsible for assisting in the maintenance of LACBWR's QA records, procedures, and indexes.
11. Technical Support Staff consists of on-site engineers (Technical Support and Reactor/Radiation Protection) and off-site engineers, covering various disciplines, and/or contractors whose services are deemed necessary, all responsible to the Plant Manager. They provide technical services to the Plant Manager in areas of licensing, analyzing test results, design changes, and may, as requested, perform audits to provide assurance that facility activities are being performed consistent with approved procedures and licensing provisions.
12. Instrument Department Personnel report directly to the Plant Manager and are responsible for the calibration, testing, maintenance, and modifications of LACBWR's plant instrument systems and components.
13. Mechanical Maintenance Department Personnel report directly to the Plant Manager and are responsible for the maintenance and modification of LACBWR's plant mechanical systems and components.
14. Electrical Maintenance Department Personnel report directly to the Plant Manager and are responsible for the testing, maintenance and modification of LACBWR's plant electrical systems and components.
15. Health and Safety Supervisor reports directly to the Plant Manager and is responsible for the administration, maintenance, and implementation of the Radioactive Waste Program, Plant Chemistry Program, Radiation Protection Program, and Environmental Monitoring Program.
16. Health Physics Personnel report directly to the Health and Safety Supervisor and are responsible to adhere to the requirements of the Radioactive Waste Program, Plant Chemistry Program, Radiation Protection Program, and Environmental Monitoring Program.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION I	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 4 OF 10

17. Shift Supervisors report directly to the Plant Manager and are responsible for the safe operation of the facility when on shift and for maintaining complete control of all activities performed on shift and ensuring that all operations are conducted safely and according to approved procedures and specifications.
18. Fuel Handlers report directly to the Shift Supervisor and are responsible for safe operation of LACBWR plant components and systems to support safe storage of spent fuel.
19. Fire Protection Supervisor reports directly to the Plant Manager and is responsible for the administration and implementation of LACBWR's fire protection program.
20. The Operations Review Committee is an advisory committee to the Plant Manager. They review facility operations and verify implementation of site quality assurance practices. Minutes of ORC meetings are distributed to the Safety Review Committee.
 - a. The Operations Review Committee shall function to advise the Plant Manager on all matters related to nuclear safety.
 - b. The Operations Review Committee shall be composed of the following:

 Chairman: Plant Manager
 Members: LACBWR Management and Engineering Staff
 - c. ORC members shall meet minimum qualifications as specified in Technical Specification 6.3.
 - d. All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.
 - e. The ORC shall meet at least once per calendar quarter and as convened by the ORC Chairman or his designated alternate.
 - f. The minimum quorum of the ORC necessary for the performance of the ORC responsibility and authority provisions shall consist of the Chairman, or his designated alternate, and three (3) members, including alternates.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION I	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 5 OF 10

- g. The Operations Review Committee shall be responsible for:
- 1) Review of [1] all procedures required by Section V of this Program and changes thereto, [2] any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.
 - 2) Review of all proposed tests and experiments that affect nuclear safety.
 - 3) Review of all proposed changes to the Appendix "A" Technical Specifications.
 - 4) Review of all proposed changes or modifications to facility systems or equipment that affect nuclear safety.
 - 5) Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the President & CEO and to the Safety Review Committee (SRC).
 - 6) Review of all REPORTABLE EVENTS.
 - 7) Review of facility operations to detect potential nuclear safety hazards.
 - 8) Performance of special reviews, investigations or analyses and reports thereon as requested by the Plant Manager or SRC.
 - 9) Review of the Contingency Plan, the Plant Security Plan, and implementing procedures.
 - 10) Review of the Emergency Plan and implementing procedures.
 - 11) Review of the Process Control Program (PCP).
 - 12) Review of the Decommissioning Plan.
 - 13) Review of the Training Plan and implementing procedures.
 - 14) Review of the Offsite Dose Calculation Manual (ODCM).
 - 15) Review of the Fire Protection Program and implementing procedures.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION I	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 6 OF 10

h. The ORC shall:

- 1) Recommend in writing to the Plant Manager approval or disapproval of items considered under g (1) through (15) above.
- 2) Render determinations in writing with regard to whether or not each item considered under g (1) through (4) above requires a license amendment.
- 3) Provide written notification within 24 hours to the President & CEO and the SRC of disagreement between the ORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements.

i. The ORC shall maintain written minutes of each ORC meeting that, at a minimum, document the results of all ORC activities performed under the responsibility and authority provisions. Copies shall be provided to the President & CEO and the SRC.

21. The Safety Review Committee is an advisory committee responsible to the President & CEO for independent reviews and audits to verify that the facility is being maintained consistent with company safety, administrative, and licensing provisions.

- a. The SRC shall function to provide independent review and audit of aspects of plant nuclear safety.
- b. The SRC shall be composed of a Chairman and a minimum of three members who are appointed by either the DPC President & CEO or the VP, Generation. The Chairman shall be appointed by the President & CEO. In addition, the Plant Manager is also a member of the SRC. SRC members appointed by the President & CEO or VP, Generation, shall not be members of the plant staff.
- c. All SRC alternate members shall be appointed in writing by the DPC President & CEO or VP, Generation, to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION I	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 7 OF 10

- d. Membership to the SRC requires that an individual meet one or more of the academic and/or experience requirements listed below. The majority of the SRC members shall meet the requirements of No. (1).
- 1) Bachelor Degree in Engineering or the physical sciences, plus five years' total experience in one or more of the below listed disciplines.
 - 2) Nine years' combined total experience in one or more of the below listed disciplines.
 - Nuclear Power Plant Technology
 - Facility Operations
 - Power Plant Design
 - Engineering/Nuclear Engineering
 - Radiation Safety
 - Safety Analysis
 - Instrumentation and Control
 - Quality Assurance
- e. Consultants shall be utilized, as determined by the SRC Chairman, to provide expert advice to the SRC.
- f. The SRC shall meet at least once per year, and as deemed necessary by the SRC Chairman or the Plant Manager.
- g. The minimum quorum of the SRC necessary for the performance of the SRC review and audit functions shall consist of the Chairman, or his designated alternate, and at least three SRC members, including alternates. No more than a minority of the quorum shall have line responsibility for the facility.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION 1	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 8 OF 10

h. The SRC shall review:

- 1) Evaluations performed by plant staff, pursuant to 10 CFR 50.59, where a determination has been that a license amendment is not required.
- 2) Proposed license amendments prior to submittal to the NRC.
- 3) Proposed changes to Appendix "A" Technical Specifications.
- 4) Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- 5) Significant deviations from normal and expected performance of facility equipment that affects nuclear safety.
- 6) All REPORTABLE EVENTS.
- 7) All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- 8) Reports and meeting minutes of the ORC.
- 9) Changes to the Contingency Plan and Plant Security Plan.
- 10) Changes to the Emergency Plan.
- 11) Changes to the Decommissioning Plan.
- 12) Changes to the Offsite Dose Calculation Manual.
- 13) Changes to the Process Control Program.
- 14) Changes to the Quality Assurance Program Description.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION I	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 9 OF 10

- i. The following audits of facility activities shall be performed by the Quality Assurance Department or a qualified off-site entity under the cognizance of the SRC. These audits shall encompass:
- 1) The conformance of facility operation to provisions contained within the Appendix "A" Technical Specifications and applicable license conditions at least once per 24 months.
 - 2) The performance, training and qualifications of the entire facility staff at least once per 24 months.
 - 3) The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 12 months.
 - 4) The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
 - 5) The Emergency Plan and implementing procedures at least once per 12 months.
 - 6) The Contingency Plan, the Security Plan and implementing procedures, at least once per 12 months.
 - 7) The Fire Protection Program and implementing procedures at least once per 24 months.
 - 8) A fire protection and loss prevention inspection and audit shall be performed at least once per 24 months.
 - 9) The ODCM and Radiological Environmental Monitoring Program and results at least once per 12 months.
 - 10) The Radiation Protection Program and the Process Control Program, and implementing procedures, at least once per 12 months.
 - 11) Any other area of facility operation considered appropriate by the SRC or the President & CEO.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION I	REV. NO. 19
	ORGANIZATION	
	DATE 05/19/05	PAGE 10 OF 10

- j. The SRC shall report to and advise the President & CEO on those areas of responsibility listed in paragraphs 21.h and 21.i. .
- k. Records of SRC activities shall be prepared, approved and distributed as indicated below:
 - 1) Minutes of each SRC meeting shall be prepared, approved and forwarded to the President & CEO within 20 days following each meeting.
 - 2) Audit reports encompassed by paragraph 21.i above, shall be forwarded to the President & CEO and to the management positions responsible for the areas audited within 30 days after completion of the audit.

B. Facility Organization Requirements

- 1. The facility organization includes one or more individuals trained in the various disciplines as noted in Figure 1.
- 2. Job descriptions have been provided for all personnel of the LACBWR staff. The job descriptions identify the authority and responsibility that are associated with the position.

C. Dairyland Power Cooperative Organization

Figure 2 shows the organization structure for Dairyland Power Cooperative. The LACBWR facility is a responsibility of the President & CEO. The Procurement Department has responsibility for all purchases as they apply to all generating stations, including LACBWR, and responsibility for control, identification, and issuance of all materials, parts, and components. Procurement is the responsibility of the VP, Finance and Administration.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION IV	REV. NO. 19
	PROCUREMENT DOCUMENT CONTROL	
	DATE 05/19/05	PAGE 2 OF 2

C. Requirements

1. Purchase requisitions for new material, equipment, and services and for spare or replacement parts shall be initiated by any department personnel. The purchase requisition shall contain the information such as quantity, item description, and technical and quality requirements necessary for procurement of the item.
2. Purchase orders shall include specifications that contain all the information necessary to assure material, equipment, and services are of adequate quality. This shall include material selection, design data, equipment description, source inspection and testing requirements, cleaning and packaging requirements, and required documentation as deemed necessary.
3. Documentation required to provide evidence that materials, equipment, and services are of adequate quality shall be clearly delineated in purchase orders. This shall include a listing of each item of documentation to be submitted, when it is to be submitted, what requires approval prior to manufacture, and to whom it shall be submitted.
4. To the extent necessary, procurement documents shall require suppliers of material, equipment, and services to have a quality assurance program complying with the pertinent provisions of 10 CFR 50, Appendix B. Suppliers shall be required to provide DPC access to their facilities and records for inspection and audit, as required, to determine compliance with provisions of the purchase order. These requirements shall extend to lower tier procurements, as determined by DPC management.
5. Purchase requisitions and engineering specifications shall be reviewed by the Quality Assurance Department to assure that all necessary technical and quality requirements are included or referenced.
6. Formal purchase orders that have been prepared from the purchase requisition shall be reviewed to assure all required information is correctly incorporated.
7. Changes in technical content in procurement documents shall be initiated and reviewed in accordance with the same procedures utilized in preparation of the original document. The Plant Manager's approval is required prior to any changes being implemented to previously approved quality control orders.

FIGURE 2

DAIRYLAND POWER COOPERATIVE
MANAGEMENT ORGANIZATION

