WILLIAM L. BERG
President and CEO

71-0025

DAIRYLAND POWER
COOPERATIVE

June 10, 2009

In reply, please refer to LAC-14067

DOCKET NO. 50-409

David W. Pstrak, Chief
Rules, Inspections, and Operations Branch
Division of Spent Fuel Storage and Transportation
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

Dear Mr. Pstrak:

SUBJECT: Dairyland Power Cooperative
La Crosse Boiling Water Reactor (LACBWR)
Possession-Only License No. DPR-45
10 CFR 71 – Quality Assurance Program

REFERENCE(S): (1) NRC Letter, Lewis to Berg, dated June 14, 2004

Dairyland Power Cooperative (DPC) requests that its Quality Assurance Program Approval for Radioactive Material Packages Number 0025, Docket Number 71-0025, Revision 7, be renewed with the same conditions of approval as before (Reference 1).

DPC has a Commission-approved quality assurance program for LACBWR which satisfies the applicable criteria of Appendix B of 10 CFR 50. Enclosed is a copy of the latest revision of the program, along with an explanation of the most recent changes, for your review. DPC will apply all appropriate parts of this program to transport packages in accordance with the requirements of 10 CFR 71.

Q004
FSME

Please contact Don Egge (608-788-4000 or 787-1484) of my staff with any questions or comments you may have regarding this submittal.

Sincerely,

DAIRYLAND POWER COOPERATIVE

William L Berg

William L. Berg
President and CEO

WLB:DGE: two

Enclosures

cc w/enc: Mark Satorius, NRC Region III Administrator
Kristina Banovac, NRC Project Manager

SUMMARY OF CHANGES

- Section 0.0 – Introduction
  - Section 0.0.A – Clarified the wording in the second paragraph regarding contractors and subcontractors.

  - Section 0.0.B – In the Terms and Definitions Sections deleted the definition for "Quality Assurance Procedure (QUA)" as these corporate procedures no longer apply to the LACBWR QAPD. They have been replaced by LACBWR specific procedures.

    Clarified the wording of the definition of "Schedule Interval".

    Clarified and revised the definition of "Q1" to add the "Reactor Building 50/5 Ton Polar Crane". This crane was previously part of the "Fuel Handling System". It will no longer be used for that purpose. However, it will remain a Q1 system due to its importance in heavy load handling and therefore it is defined as its own system.

- Section I – Organization
  - This section has been revised to describe a modified and improved LACBWR Organization. The Plant Manager will perform the duties of the Security Supervisor, which previously was collateral duty of an Operations Shift Supervisor. This change is being done to more efficiently utilize the Shift Supervisor in the performance of project activities. While the Plant Manager will maintain the overall responsibility for managing the LACBWR facility and all personnel assigned to it, general internal plant organizational reporting relationship changes will facilitate improved work accomplishment and improve the personnel management effectiveness.

    There are two new supervisory positions. The position of Operations, Training/Relief Supervisor will directly supervise the Operations Shift Supervisors and will have the responsibility for the safe operation of the facility. The Health and Safety Supervisor will directly supervise the crafts as well as the health and Safety Department. This new position is titled "Health and Safety/Maintenance Supervisor". Forepersons, reporting to the Health and Safety/Maintenance Supervisor, have been added to coordinate and direct activities of the respective crafts; Mechanical, Electrical and Instrumentation. The Technical Support Staff has been increased to support the project related work.

    All aforementioned changes are included in Section I.A paragraphs 1 through 20.

- Section I.A.22
  - Added 'Genoa Site' to the Administrative Secretary title.

- Section I.A.23.g.15
  - Added number 15 to the Operations Review Committee responsibilities as "Review of significant conditions adverse to quality and for recommending corrective actions".

- Section VII.E.5
  - Revised the last sentence in the paragraph from "A Discrepancy Report shall be initiated", to "A Corrective Action Report (CAR) shall be initiated". This incorporates LACBWR's revised corrective action system.

- Section XVI.C.1
  - Removed reference to Incident Report in this paragraph and replaced it with Corrective Action Report (CAR) to incorporate LACBWR's revised corrective action system.

- Section XVI.C.3
  - Removed reference to Deficiency Report in this paragraph and replaced it with Corrective Action Report (CAR) to incorporate LACBWR's revised corrective action system.

- Section XVII.D.3
  - Removed paragraphs 4 and 5 that pertained to ORC minutes and SRC activities. These requirements are contained in Section I of the QAPD under each respective organization's record requirements.

- Table 1
  - Revised to removed obsolete implementing procedures and add new implementing procedures.

- Figure 1
  - The Organization Chart has been revised to reflect the internal changes of LACBWR's organization as described in Section I.

The QAPD is being distributed in its entirety due to reformatting and paginating.

The above described changes are administrative in nature or are changes internal to the LACBWR Organization and do not constitute a reduction in commitment to quality.

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 Manager, Quality Assurance, 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)

Dec. 9, 2008
(Date)

QUALITY ASSURANCE PROGRAM DESCRIPTION

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0.0 INTRODUCTION

A. General

The La Crosse Boiling Water Reactor (LACBWR) Quality Assurance Program is designed to meet the requirements of 10 CFR 50, Appendix B, and reflects the direction of applicable regulatory guides and industry standards, as they apply to a possession-only condition, thereby assuring that the health and safety of the public is not caused undue risk.

The program described herein is applied by Dairyland Power Cooperative (DPC) to assure safe operation of the LACBWR facility. It applies to those identified structures, systems, and components associated with a safe storage condition. It shall be applied to activities such as design, procurement, modifications, fabrication, installation, maintenance, testing, and fuel handling at the LACBWR plant by DPC or its contractors, and their subcontractors.

Design and fabrication of shipping casks used for shipment of radioactive material will not be conducted under this Quality Assurance Program.

Quality Assurance (QA) as defined herein encompasses all those planned and systematic actions necessary to provide adequate confidence that a component, structure, or system will perform satisfactorily in service. It is recognized as an interdisciplinary function and not the sole responsibility of the Quality Assurance Department.

It is DPC's policy that the group performing and directly responsible for the work, such as engineering, design, procurement, maintenance, and testing is responsible for the quality of work. This includes quality control and verification that their work is performed in accordance with approved documents. The QA Department has responsibility for auditing the other groups and assuring DPC management that the QA Program is being fully implemented.

B. Terms and Definitions

The definitions listed below are used frequently throughout this document.

COMPANY - Dairyland Power Cooperative (DPC)

LACBWR - La Crosse Boiling Water Reactor.

QUALITY ASSURANCE (QA) - All those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service.

QUALITY CONTROL (QC) - Those Quality Assurance actions which provide a means to control and measure the characteristics of an item, process or facility to established requirements.

ORC - Operations Review Committee.

FACILITY - Encompasses the site and facility systems which support a possession-only license (SAFSTOR) condition, but excludes electric power transmission apparatus located beyond the site switchyard.

PLANT PROCEDURE - A document describing the manner of conducting an action or process.

ADMINISTRATIVE CONTROL PROCEDURE (ACP) - A document which establishes the guidelines and requirements governing functional activities (i.e., Administration, Material Request, Control Room Log, etc.).

QUALITY ASSURANCE INSTRUCTION (QAI) - A document which establishes the guidelines and requirements governing quality assurance and control activities.

QA MANUAL - Manual comprised of the QA Program Description.

SRC - Safety Review Committee.

SCHEDULE INTERVAL - A time frame within which a scheduled activity shall be performed with a maximum allowable extension not to exceed 25 percent of the schedule interval.

Q1 - Any item or component within the FESW System, Fuel Handling System, and Reactor Building 50/5 Ton Polar Crane.

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 Manager, QA.

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.

   The Plant Manager is the Security Supervisor and has access to the DPC President and CEO if necessary for security matters, and is responsible for implementation and administration of the LACBWR Physical Security Program.

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

4. Manager, Quality Assurance (QA) reports directly to the Director, Generation Support Services, with direct 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 Manager, QA, has the authority to stop fabrication, installation, or testing of structures, systems, or components that do not conform to specifications or approved procedures.

5. Quality Assurance Department Personnel report directly to the Manager, QA, and are responsible for assuring that the activities required by the QA Program are implemented.

6. Director, Generation Support Services, reports directly to the VP, Generation Division, and has corporate oversight of the QA Department.

7. Operations, Training/Relief Supervisor reports directly to the Plant Manager and has responsibility for safe operation of the facility as well as establishing and implementing a training and requalification program for all facility personnel in accordance with applicable regulations. He ensures that regular inspections of the facility are performed, and he is responsible for the review of all log sheets, malfunction reports, and surveillance records. He is concerned with the detailed operation and maintenance of the facility. He enforces all facility operating and safety procedures and ensures that approved operating and maintenance procedures are followed.

8. Shift Supervisors report directly to the Operations, Training/Relief Supervisor 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.

9. 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.

10. Fire Protection Supervisor reports directly to the Plant Manager and is responsible for the administration and implementation of LACBWR's fire protection program.

11. Health and Safety/Maintenance 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. Directly supervises and coordinates all activities relating to maintenance of the facility and is responsible for maintenance records and ensures that approved maintenance procedures are followed.

12. Health and Safety Foreman reports directly to the Health and Safety/Maintenance Supervisor and is responsible for assisting in the administration, maintenance, and implementation of the Radioactive Waste Program, Plant Chemistry Program, Radiation Protection Program and Environmental Monitoring Program.

13. Health Physics Personnel report directly to the Health and Safety/Maintenance Supervisor and are responsible to adhere to the requirements of the Radioactive Waste Program, Plant Chemistry Program, Radiation Protection Program, and Environmental Monitoring Program.

14. Instrument Foreman reports directly to the Health and Safety/Maintenance Supervisor and is responsible for coordinating the calibration, testing, maintenance, and modifications of LACBWR's plant instrument systems and components.

15. Mechanical Foreman reports directly to the Health and Safety/Maintenance Supervisor and is responsible for the maintenance and modification of LACBWR's plant mechanical systems and components.

16. Electrical Foreman reports directly to the Health and Safety/Maintenance Supervisor and is responsible for the testing, maintenance and modification of LACBWR's plant electrical systems and components.

17. Instrument Personnel report directly to the Health and Safety/Maintenance Supervisor and are responsible for the calibration, testing, maintenance, and modifications of LACBWR's plant instrument systems and components.

18. Mechanical Personnel report directly to the Health and Safety/Maintenance Supervisor and are responsible for the maintenance and modification of LACBWR's plant mechanical systems and components.

19. Electrical Personnel report directly to the Health and Safety/Maintenance Supervisor and are responsible for the testing, maintenance and modification of LACBWR's plant electrical systems and components.

20. 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 and are all responsible to the Plant Manager. They provide technical services to the Plant Manager in areas of licensing, analyzing test results, design changes, projects, and may, as requested, perform audits to provide assurance that facility activities are being performed consistent with approved procedures and licensing provisions.

21. Administrative Assistant reports directly to the Plant Manager and is responsible for maintenance of LACBWR's QA records, procedures, and indexes.

22. Administrative Secretary-Genoa Site reports directly to the Administrative Assistant and is responsible for assisting in the maintenance of LACBWR's QA records, procedures, and indexes.

23. 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.

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 Security Plan, the Training Qualification Plan, and the Unescorted Access Authorization, Fitness for Duty and Behavior Observation Programs.

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 Offsite Dose Calculation Manual (ODCM).

14) Review of the Fire Protection Program and implementing procedures.

15) Review of significant conditions adverse to quality and for recommending corrective actions.

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.

24. 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.

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.

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.

i. The following evaluations of facility activities shall be performed by the Quality Assurance Department or a qualified off-site entity under the cognizance of the SRC. These evaluations 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.

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.

II. QUALITY ASSURANCE PROGRAM

A. General

The QA Program described herein sets forth the requirements for the QA organization, personnel responsibilities, controls, and measures established to achieve, maintain, and document quality. These requirements include, but are not limited to, the following:

1. Incorporation of applicable regulatory criteria, codes, standards, and design bases for structures, systems, and components into the test, operating, and maintenance procedures.

2. Performance of all installation, calibration, and testing on all necessary components in accordance with approved procedures.

3. Approved procedures being used in the operation, maintenance, testing, fuel handling, repairing, and modification of the facility in compliance with licensing regulations and consistent with quality practices established by DPC.

4. Maintenance of QA record keeping, including reports, test results, records, and logs.

5. Resolution of items of deficiency as noted by LACBWR QA personnel, Safety Review Committee, and NRC Compliance with appropriate notifications made to DPC Corporate Management.

6. Performance of audits by QA personnel to verify that administrative controls, plant procedures, and procurement documents contain the necessary QA input requirements and appropriate documentation thereof.

B. Applicability

The LACBWR QA Program is based on the requirements of 10 CFR 50, Appendix B, "Quality Assurance Requirements for Nuclear Power Plants," and Regulatory Guide 1.33 which addresses the applicable requirements of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," as they apply to a possession-only license.

C. Implementation

Individuals assigned responsibilities, as discussed under "ORGANIZATION," shall prepare administrative and quality assurance procedures as necessary to implement the requirements of this program. Procedures shall include appropriate quantitative and qualitative acceptance criteria necessary to determine that the activity is being properly performed. Audit reports are distributed to DPC management for their review and assessment of the QA Program, as to effectiveness, scope, adequacy, and implementation. Indoctrination in the QA Program requirements shall be provided to all facility personnel performing activities which could affect the quality of components, systems, or structures.

III. DESIGN CONTROL AND REVIEW

A. General

This section establishes the requirements to assure that the structures, systems, and components of the LACBWR are added, deleted, changed or modified in accordance with the codes, standards, and regulations that governed the original design, except as amended and approved. Measures shall be established for the review, evaluation, and approval of all design changes governing structures, systems, or components.

Design and fabrication of shipping casks used for shipment of radioactive materials will not be conducted under this section.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing procedures to implement design control. QA shall review design drawings, specifications, calculations, and procurement documents to assure that quality standards are included or referenced.

2. The job coordinator assigned by the Plant Manager is responsible for completion of any facility change that becomes necessary for the LACBWR facility.

3. The job coordinator is responsible for the incorporation of design bases, regulatory requirements, codes and standards into drawings, specifications, procedures, and instructions.

4. The Operations Review Committee is responsible for reviewing all proposed facility changes and recommending approval or disapproval to the Plant Manager. The review shall determine whether the proposed modifications involve any License Amendment Request or a possible change in the Technical Specifications.

5. The Plant Manager is responsible for reviewing the recommendations of the Operations Review Committee and taking appropriate action. He shall refer any License Amendment Request to the Safety Review Committee.

6. The Safety Review Committee is responsible for providing an independent review of facility changes. They shall provide assurance that the facility modification meets the design bases, regulatory requirements, and applicable codes and standards.

C. Requirements

1. A Facility Change shall be initiated for all modifications to structures, systems, and components important to safety and systems maintained operational during SAFSTOR. Facility Changes may be initiated by any knowledgeable person.

2. A control procedure shall be used for all modifications to systems determined no longer necessary for SAFSTOR.

3. Design bases, regulatory requirements, and applicable codes and standards shall be delineated for all proposed plant modifications to structures, systems, and components important to safety and systems maintained operational during SAFSTOR. These conditions shall be incorporated into drawings, specifications, procurement documents, and procedures by the job coordinator. The Quality Assurance Department shall specify appropriate quality standards.

4. The Facility Change procedure shall describe and control design changes to structures, systems, and components important to safety and systems maintained operational during SAFSTOR, from concept through final approval, distribution, and implementation of the change. The procedure shall provide for the review of stress, hydraulic, thermal, and accident analyses, compatibility of materials, maintenance, test, and repair as appropriate. The procedure shall provide for a design review by an engineer or other qualified individual other than the one who performed the design.

5. All proposed modifications shall be reviewed to determine whether they require a License Amendment Request.

IV. PROCUREMENT DOCUMENT CONTROL

A. General

This section establishes the measures to assure that procurement documents (purchase requisitions and orders) covering material, equipment, and services for Q1 systems specify appropriate quality requirements. The purchase order specifies or references the applicable requirements, design bases, codes, and standards to assure quality.

B. Responsibilities

1. The Quality Assurance Department is responsible for developing procedures to control the preparation, review, and approval of purchase orders for material, equipment, and services covered by the Quality Assurance Program.

2. LACBWR Staff are responsible for initiation of purchase requisition worksheets for material, equipment, and services required for maintenance, repair, and modifications.

3. The Engineering Staff is responsible for preparing engineering specifications which detail the technical and quality requirements for material, equipment, and services. Engineering is also responsible for preparing purchase requisition worksheets for material, equipment, and services required for major facility modifications.

4. Purchasing is responsible for preparing, reviewing, approving, issuing, and controlling purchase orders.

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.

V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS

A. General

This section establishes the measures to assure that activities relating to a possession-only condition are performed in accordance with approved instructions, procedures, and drawings.

B. Responsibilities

1. The Quality Assurance Department is responsible for preparing or reviewing all procedures that are required for implementation of the QAPD.

2. LACBWR Operations Department is responsible for initiating and reviewing changes in routine, abnormal, and emergency procedures.

3. Department Personnel are responsible for initiating their respective maintenance procedures.

4. The Plant Manager is responsible for approval of all new procedures or changes to existing procedures.

5. The Operations Review Committee is responsible for reviewing all initial and revised procedures that affect facility operations and shall determine whether these procedures involve a License Amendment Request.

6. The Safety Review Committee shall review new procedures or changes to existing procedures, when determined by the Operations Review Committee that they involve a License Amendment Request.

C. Requirements

1. Detailed instruction for possession-only operation of the plant shall be contained in procedures and checklists covering the following activities:

   a. administrative control,

   b. general system operation,

   c. startup, operation, and shutdown of systems,

   d. correction of abnormal, off-normal, or alarm conditions,

   e. control of emergencies and other significant events,

   f. radioactivity control,

   g. chemical and radiochemical control,

   h. Security Plan implementation,

   i. quality assurance,

   j. fuel handling,

   k. surveillance and test activities of equipment,

   l. Emergency Plan implementation,

   m. Fire Protection Program implementation,

   n. Process Control Program implementation,

   o. Offsite Dose Calculation Manual implementation, or

   p. any other procedures required by Regulatory Guide 1.33, Revision 2, for a possession-only condition.

2. For activities other than those within normal craft expertise, instructions for maintenance and repair shall be contained in procedures. These procedures shall contain instructions for preparation, performance, testing, and return to service. The procedures may reference manufacturer's instruction manuals, drawings, and other sources, as applicable.

3. Instructions, procedures, or drawings shall delineate methods and sequences when an activity is to be performed. These documents shall include appropriate quantitative or qualitative acceptance criteria for determining that the activity has been satisfactorily performed.

4. The department responsible for an activity shall be required to provide the necessary internal review and approval of instructions, procedures, or drawings prior to performing the activity.

5. Changes to or deviations from established instructions, procedures, or drawings will require the same review and approval as the original document. However, temporary changes to procedures that do not change the intent of the original procedure may be made in ink, dated, and approved by two people of the facility management staff. Such changes shall be documented and reviewed by the ORC and approved by the Plant Manager within 30 days of implementation.

6. Applicable sections of the appropriate procedures shall be followed in the review, processing of changes or deviations, filing, and distribution of procedures, drawings, and specifications.

7. Procedures will be reviewed periodically as set forth in administrative procedures.

VI. DOCUMENT CONTROL

A. GENERAL

This section establishes the requirements for document control as it applies to the LACBWR facility.

B. RESPONSIBILITIES

1. The Quality Assurance Department is responsible for preparing a standard procedure for controlling the issuance of procedures and is also responsible for preparing procedures for controlling the distribution of operating, maintenance, repair, and modification procedures.

2. One Shift Supervisor has been assigned the responsibility of maintaining the LACBWR Operating Manual and any approved changes to the manual. He is further responsible for the assurance that approved drawings, procedures, and other pertinent documents are incorporated in the LACBWR Operating Manual.

3. The DPC Drawing Control Specialist is responsible for preparing a standard procedure for controlling the issuance of drawings and specifications.

C. REQUIREMENTS

1. Procedures shall be established for the issuance of procedures, drawings, and specifications. A document control procedure shall be prepared to provide a uniform system of document identification.

2. All documents shall have an identification number, title, date, and revision number. Documents shall be filed and controlled by use of this identification. Each type of document shall be filed in a central location identified in a document control procedure.

3. Drawings, specifications, and procedures, including revisions, shall be reviewed for adequacy and approved for release by authorized personnel. The required reviews and approvals shall be specified in a document control procedure.

4. The Administrative Assistant shall assure that current documents are distributed to and used at the location where the prescribed activity is performed. Documents and revisions shall be distributed as specified in a document control procedure. Preliminary and superseded documents shall be clearly identified and closely controlled to preclude their misuse.

5. An index of each type of document shall be established and maintained to provide the current status of documents.

VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

A. General

This section establishes the requirements to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents.

B. Responsibilities

1. The Quality Assurance Department is responsible for developing procedures for supplier evaluation and qualification. QA shall be responsible for coordinating supplier evaluation, qualification, and evaluating supplier Quality Programs.

2. The Engineering Staff shall be responsible for evaluating supplier manufacturing and technical capabilities.

3. The Operations Department shall be responsible for evaluating the performance of material and equipment in service.

4. The Quality Assurance Department is responsible for developing procedures for receiving inspection of material and equipment.

C. Supplier Qualification

1. Qualification of suppliers shall consist of DPC's experience with the supplier, supplier's reputation and experience in the field, and in the nuclear industry, a Quality Assurance Program and/or other factors, as appropriate.

2. Suppliers of casks used for shipment and storage of radioactive material shall be evaluated to ensure that the design and fabrication of packaging are performed under the control of an NRC-approved QA Program.

D. Source Inspection

1. When appropriate, suppliers shall be requested to furnish DPC with sufficient information concerning their manufacturing and inspection plan to permit DPC or their designated agent to plan and implement a source inspection plan.

2. When appropriate, inspection plans shall include witness and hold points for inspection of items, witnessing of processes or tests, audit of required quality documentation, and verification that vendors have complied with the specification requirements and have documented any deviation from the specifications.

E. Receiving Inspection

1. Items shall be examined by Materials Management personnel upon receipt for shipping damage, correctness of identification, and specified quality documentation, in accordance with approved instructions.

2. Documentary evidence attesting that items conform to purchase order requirements shall be available at the plant prior to installation or use of the item.

3. Documentary evidence shall be sufficient to identify that specific requirements such as codes, standards, and specifications are met by the purchased item. This requirement shall be satisfied by having available at the plant, copies of the purchase order and appropriate documents referenced therein.

4. All QC ordered materials, parts, and components will be segregated upon receipt and will be placed in a receiving inspection hold area separate from storage facilities. After acceptance, the material will be stamped as acceptable and placed in specified spare parts storage.

5. During receiving inspection, if a nonconformance or discrepancy exists, the material shall be placed on hold and will remain in a hold status until final disposition is determined. A Corrective Action Report (CAR) shall be initiated.

6. Items dispositioned as unacceptable for use shall be rejected and removed from the controlled receiving inspection area.

VIII. IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

A. General

This section establishes the requirements for identification and control of material, parts, and components, based on systems' designation as described in procedures, from receipt at the plant through installation or use.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing the overall requirements for the identification and control of materials, parts, and components from receipt through installation or use, and/or developing procedures and instructions for the control and issuance of quality related materials, parts, and components.

2. The Plant Manager shall approve and implement procedures for the identification and control of materials, parts, and components.

3. The Materials Handling Department of DPC is responsible for control of, identification, and issuance of all material, parts, and components.

C. Requirements

1. Approved instructions and procedures shall be implemented for the identification and control of materials, parts, and components from receipt through installation or use. An identification system utilizing purchase order numbers shall be implemented for identification of material, parts, and components.

2. Specifications shall require that materials, parts, and components are identified in accordance with purchase order numbers and shall require that documentation have identification providing traceability to the item.

3. Physical identification by purchase order number shall be used to the maximum extent possible for relating an item at any time to applicable documentation. Identification shall be either on the item or records traceable to the item. Where physical identification is impractical, physical separation, procedural control, or other appropriate means shall be employed.

IX. CONTROL OF SPECIAL PROCESSES

A. General

This section establishes the measures to assure special processes, including welding, heat treating, and non-destructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing procedures that describe how personnel and procedures are qualified for special processes.

2. The Quality Assurance Department is responsible for preparing procedures for welding, heat treating, cleaning, non-destructive examination, and filler metal control. The Plant Manager is responsible for assuring the qualification of personnel in special processes and maintaining records of qualified personnel and procedures.

3. The Quality Assurance Department is responsible for assuring maintenance, repair, and modification work involving special processes to be performed by qualified personnel in accordance with qualified procedures.

C. Requirements

1. Welding, heat treating, cleaning or decontamination of parts, and non-destructive examination shall be accomplished under controlled conditions in accordance with applicable codes, standards, criteria, and other special requirements, using qualified personnel and procedures. Qualification of personnel and procedures shall comply with the requirements of applicable codes and standards.

2. Welders and welding procedures shall be qualified, as appropriate, in accordance with Section IX of the ASME Boiler and Pressure Vessel Code and/or AWS D1.1 American Welding Society Structural Welding Code. Records of the test results obtained in welding procedures and welder performance qualifications and a listing of qualified personnel and procedures shall be maintained.

3. Non-destructive examination personnel shall be qualified in accordance with the American Society for Non-destructive Testing Standard SNT-TC-1A. Records of training, test results, and a listing of qualified personnel shall be maintained.

4. Plant procedures shall be established to describe the requirements for qualification of personnel and procedures.

5. Procedures shall be established to describe the method used to control the receipt, storage, baking, drying, and disbursal of welding filler metals.

6. Equipment used for accomplishing special processes shall be calibrated, maintained, stored, handled, and issued in accordance with applicable procedures.

X. INSPECTION

A. General

This section establishes a program for inspection of possession-only activities to verify conformance with approved procedures, drawings, and specifications.

B. Responsibilities

1. The Quality Assurance Department is responsible for assuring adequate inspection requirements are included in engineering specifications, and reviews of any inspection procedures implementing this section are completed.

2. The QA Department is responsible for establishing inspection procedures and assuring adequate inspection requirements are included in procedures. It is also responsible for coordinating the assignments of qualified inspection personnel.

3. The Plant Manager shall be responsible for approving inspection procedures. The Plant Manager shall also assure sufficient inspections are performed to provide adequate confidence that activities meet predetermined requirements.

C. Requirements

1. Inspections shall be performed only by qualified personnel. In no case shall the acceptance inspection be performed by the individual who performed the activity.

2. Mandatory inspection hold points, which require witnessing or inspecting of an activity before proceeding, shall be indicated in the appropriate procedures or specifications. The inspection shall be documented to indicate approval and release prior to continuation of the activity.

3. Inspection requirements shall apply to all activities whether performed by company personnel or contractor personnel, and shall require that inspection procedures and instructions, along with necessary drawings, are provided prior to commencing inspection activities.

4. Inspection requirements governing modifications, repairs, and replacement shall be in accordance with the original design and inspection requirements or as amended by approved changes to the original design.

XI. TEST CONTROL

A. General

This section establishes the requirements for a test program to demonstrate that structures, systems, and components will perform satisfactorily in service. The test program shall include, but not be limited to, surveillance testing, special tests, post maintenance testing, and testing following facility modification or significant changes in procedures.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing the requirements to control the test program. The test program shall include, but not be limited to, surveillance testing, special tests, post maintenance testing, and testing following facility modification or significant changes in procedures.

2. Engineers and/or designated Management Staff shall be responsible for preparation and review of test procedures, surveillance during testing, and review and documentation of test results.

3. The Plant Manager is responsible for the approval of test procedures. He is also responsible for the conduct of all testing associated with LACBWR.

4. The Engineering or Management Staff is responsible for establishing specifications, requirements and acceptance criteria for testing following plant modifications. They also shall review and approve test results for testing following plant modifications.

5. The Operations Review Committee is responsible for review of all proposed test procedures, special testing procedures, performance testing procedures following facility modification, and 50.59 reviews.

6. The Safety Review Committee is responsible for reviewing 50.59 evaluations to verify that such tests did not require a license amendment, and for reviewing proposed test activities that involve a License Amendment Request, prior to submittal to the NRC.

C. Requirements

1. A program shall be established to assure all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and documented.

2. Testing shall be performed in accordance with approved test procedures that incorporate or reference the requirements and acceptance criteria contained in applicable design documents and Technical Specifications.

3. Test procedures shall incorporate, but not be limited to, requirements for such items as: hold points, witness points, caution notes, emergency requirements, and test jumper logs.

4. Test procedures shall include, as a minimum, provisions for assuring that:

   a. Prerequisites have been completed that include, as a minimum:

      1) Control of systems status as necessary.

      2) Availability of calibrated instrumentation and special equipment.

   b. Test objectives and applicable acceptance limits are stated.

   c. Test results are documented.

   d. Detailed instructions for performing the test are included.

   e. Test results are reviewed and approved.

5. Test reports shall include identification of the inspector, individual conducting the test, the data recorder, the type of observation made, the equipment used, the test results, the acceptability of the test results, and approved disposition for any deviations.

   Test results which fail to meet the requirements and acceptance criteria shall be properly noted and appropriate corrective action taken.

XII. CONTROL OF MEASURING AND TEST EQUIPMENT

A. General

This section establishes the requirements for written procedures for the control, calibration, and periodic adjustment of tools, gauges, instruments, and other measuring and test equipment used to verify conformance to established requirements.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing requirements for a program for the control, calibration, and periodic adjustment of tools, gauges, instruments, and other measuring and test equipment used by facility personnel.

2. Personnel using Measuring and Test equipment are responsible for periodic calibration and adjustment of tools, gauges, instruments, and other measuring and test equipment to assure compliance with the implementing procedures.

3. The Plant Manager is responsible for implementing the requirements of this section of the manual. He is also responsible for approving procedures.

C. Requirements

1. Inspection, test, and work procedures shall include provisions to assure that tools, gauges, instruments, and other inspection, measuring, and test equipment and devices used in activities affecting quality are of the proper range, type, and accuracy to verify conformance to established requirements and test parameters.

2. To assure equipment accuracy, inspection, measuring, and test equipment shall be controlled, calibrated, adjusted, and maintained periodically, or prior to use. Calibrations are performed against certified measurement standards that are traceable to nationally recognized standards. Where national standards do not exist, provisions will be established to document the basis for calibration. Control measures and procedures shall prevent the use of calibrated tools, gauges, instruments, and other measuring and test equipment by unauthorized personnel. Special calibration and control measures are not required for devices when normal commercial practices provide adequate accuracy.

3. When an item of measuring and test equipment is found to be out of calibration, an investigation will be conducted and documented to determine the validity of previous inspections, tests, or calibrations which were performed with the use of that item.

4. Records or logs of the calibration history of measuring and test equipment shall be maintained.

5. Measuring and test equipment shall be controlled by a permanently affixed serial number. Calibration decals, tags or stickers shall be displayed prominently on each device and shall reflect the date of calibration, due date of the next calibration (for recurring calibration) and identity of person performing the calibration.

XIII. HANDLING, STORAGE, AND SHIPPING

A. General

This section establishes the requirements for procedures to control the handling, storage, shipping, cleaning, packaging, and preservation of material and equipment to prevent damage, deterioration, or loss through shipment, installation or use.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing requirements for the handling, storage, and shipping of materials, parts, and components covered by the Quality Assurance Program.

2. The Plant Manager is responsible for implementing the requirements of this section of the Quality Assurance Program Description and shall approve all implementing procedures.

C. Requirements

1. The requirements for handling, storage, shipping, cleaning, and preservation of materials, and equipment shall be documented in approved procedures.

2. Procurement documents shall include instructions for the handling, storage, shipping, cleaning, and preservation of the item being supplied, as applicable.

3. Procurement documents specify marking requirements, special covering, and protective environments, such as inert gas atmosphere, moisture content levels, and temperature levels, as applicable.

4. Specifications and procedures establish the requirements for special handling tools and equipment to ensure safe and adequate handling of critical, sensitive, or radioactive items.

5. Special handling tools and equipment will be inspected and tested in accordance with approved procedures, at specified intervals, to verify that tools and equipment are adequately maintained.

6. Materials and equipment will normally be handled by materials handling personnel. Fuel and other special shipments which require special equipment and handling will be handled by others knowledgeable and/or specially trained personnel. The proper use of fuel handling equipment will be described in fuel handling procedures.

7. Storage of material and equipment will be in areas free from fumes, vapors, and dust. Storage will be in areas protected from the weather, as appropriate, and in which chemical storage is excluded, except as may be specifically authorized in writing. Storage will be in areas which satisfy the handling and storage requirements specified for the item.

XIV. INSPECTION, TEST, AND OPERATING STATUS

A. General

This section of the manual describes the system for indicating the inspection, test, and operating status of components and systems.

B. Responsibilities

1. The Plant Manager is responsible for ensuring that the status of operating equipment or systems to be removed from service for maintenance, test, inspection, repair, or modification is in accordance with the approved LACBWR procedures. The Plant Manager is also responsible for the control of facility status during equipment or system modifications.

2. The QA Department shall monitor the status of activities for compliance with approved procedures and shall ensure inspection results are properly logged. They shall establish the procedures for implementing the work inspection or status sheets during maintenance, repair, and modifications and shall ensure inspection results are properly logged.

C. Requirements

1. Equipment or systems not ready for normal service shall be clearly identified by use of tags, an equipment status board, and the Control Room Log Book to indicate their status.

2. Equipment or system inspection and test status shall be indicated by use of a yellow "Special Information" Tag or Control Room Log Book.

3. Structures, systems, and components that are found to be unacceptable during or after testing shall be clearly identified in the Shift Supervisor's Log Book or on the Test Data Sheets.

4. Operations involving handling of fuel assemblies or other radioactive sources shall be identified and controlled by the use of tags, control log sheets, or other suitable means.

5. Facility maintenance, repair, or modification of components, systems, or structures will utilize a test sheet or Shift Supervisor log entry to indicate its acceptance or rejection for a particular component, system, or structure.

6. Maintenance Requests shall be used to originate, approve, authorize, and document all non-routine maintenance or repair work performed at LACBWR.

XV. NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

A. General

This section establishes measures to control materials, parts, or components that do not conform to requirements, thereby preventing their inadvertent use or installation.

B. Responsibilities

1. The Quality Assurance Department shall be responsible for establishing a procedure for the control, evaluation, and disposition of deficient materials, parts, and components.

2. The Engineering Staff is responsible for reviewing nonconforming items that cannot be corrected by vendor action and recommending disposition. The Engineering Staff is also responsible for preparing procedures for repair and rework of nonconforming items.

C. Requirements

1. Materials, parts, or components that do not conform to requirements shall be identified and placed in a hold status. Nonconforming items shall remain in a segregated area until approved disposition has been determined.

2. The vendor shall be notified of all nonconforming items and requested to correct the deficiency. Purchasing is responsible for coordinating the disposition of deficient items with vendors. Quality Assurance staff is responsible for inspecting and accepting or rejecting items that have been corrected by vendors.

3. Deficiencies which cannot be corrected by the vendor shall be reviewed by the Engineering Staff. The Engineering Staff will recommend repair, rework, accept, or reject. Items shall be repaired or reworked only in accordance with approved procedures and shall be re-inspected after repair by the QA Department. QA shall ensure that documented and approved procedures are available prior to repair or rework and shall re-inspect all repaired or reworked items.

   Items which are accepted for use with a known deficiency shall be fully documented with the specification requirement, justification for acceptance, and effect of such use. All such items shall be approved by the Plant Manager prior to use.

XVI. CORRECTIVE ACTION

A. General

This section establishes measures to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and non-conformances are promptly identified and corrected.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing procedures for the identification, review, and correction of conditions adverse to quality.

2. The Operations Review Committee is responsible for reviewing significant conditions adverse to quality and recommending corrective action.

3. The Engineering Staff is responsible for reviewing conditions adverse to quality which involve design deficiencies to determine the cause of the condition and for recommending corrective action to preclude repetition.

C. Requirements

1. Conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, shall be reported on a Corrective Action Report (CAR) or Licensee Event Report (LER). The CAR shall identify the condition, the cause of the condition, and the corrective action taken.

2. Conditions adverse to quality which involve design deficiencies, or recommended corrective actions that involve a design change, shall be reviewed by the Engineering Staff.

3. Nonconforming materials, parts, or components shall be identified by a CAR. A CAR shall be initiated and processed whenever the actual condition is not in accordance with drawings or specifications. Corrective action is an integral part of the nonconforming control system.

4. Maintenance Requests can be a part of the documented corrective action program.

5. Quality Assurance Department shall audit corrective actions to assure that the cause of the condition has been determined and that corrective action has been taken in accordance with recommendations.

XVII. QUALITY ASSURANCE RECORDS

A. General

This section establishes measures for maintaining records which cover all documents and records associated with the decommissioning, operation, maintenance, repair, and modification of structures, systems, and components covered by the Quality Assurance Program Description.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing the requirements of this section.

2. The Plant Manager is responsible for approving and implementing procedures for this section.

C. Storage Requirements

1. Originals of special process records are stored in a fire-retardant area designed to accommodate such records.

2. On-site storage facility is constructed in such a manner as to safeguard the contents from fire, extreme temperature, and moisture variations.

3. Entry to the record storage areas is controlled, and only authorized personnel are permitted access.

4. Storage requirements shall meet ANSI N45.2.9, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records."

D. System Requirements

1. A system shall be established to identify all documents that must be kept permanently (lifetime records). An index of non-permanent records shall be established.

2. An approved document listing will be reviewed on a regular basis to verify that the record file contains the latest revisions of all required documents.

3. A system will be established to control the issuance and return of all records.

E. Record Retention

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

1. The following records shall be retained for at least five years:

   a. Records and logs of facility operation.

   b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

   c. All REPORTABLE EVENTS submitted to the Commission.

   d. Records of surveillance activities, inspections, and calibrations required by the QAPD.

   e. Records of changes made to the procedures required by Section V of the QAPD.

   f. Records of radioactive shipments.

   g. Records of sealed source and fission detector leak tests and results.

   h. Records of annual physical inventory of all sealed source material of record.

   i. QA Audits.

2. The following records shall be retained for the duration of the LACBWR License:

   a. Facility design modification packages.

   b. Records of new and irradiated fuel inventory, fuel transfers and assembly burn-up histories.

   c. Records of radiation exposure for all individuals entering radiation control areas.

   d. Records of gaseous and liquid radioactive material released to the environs, and records of analyses required by the Radiological Environmental Monitoring Program.

   e. Records of reactor tests and experiments.

   f. Records of training and qualification for current members of the facility staff.

   g. Records of in-service inspections performed pursuant to Technical Specifications.

   h. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to the LACBWR Decommissioning Order dated Aug. 7, 1991, as modified Sept. 15, 1994, and 10 CFR 50.59.

   i. Records of meetings of the ORC and the SRC.

   j. Records of Decommissioning and/or Dismantlement of the facility.

XVIII. AUDITS

A. General

This section establishes the requirements for a system of planned and documented audits to verify compliance with all aspects of the Quality Assurance Program and to assess the effectiveness of the program. The system provides for the reporting and review of audit results by appropriate levels of supervision and management.

B. Responsibilities

1. The Quality Assurance Department is responsible for implementing this section. They are responsible for developing audit checklists, designating and training audit personnel, and conducting audits.

C. Requirements

1. Audits shall be performed in accordance with written procedures or checklists by appropriately trained personnel having no direct responsibilities in the area audited.

2. Audits may be conducted by Quality Assurance personnel or other qualified personnel, such as technical specialists from other company departments and outside consultants.

3. Audit and surveillance results shall be documented and reviewed with supervision responsible for the area audited, who shall take necessary action to correct reported deficiencies.

4. Audit results shall be documented and reported to the supervision having responsibility in the area audited.

5. Quality Assurance Auditors shall assess the following:

   a. evaluation of quality assurance practices, procedures, and instructions;

   b. effectiveness of implementation; and

   c. conformance with approved procedures.

6. A system of planned and scheduled audits shall be generated. All planned and scheduled audits shall be performed within their schedule interval.

7. In addition, audits shall be conducted on an unscheduled basis, when one or more of the following conditions exist:

   a. When significant changes are made in functional areas of the Quality Assurance Program, including significant reorganizations and procedural revisions.

   b. When it is suspected that safety, performance, or reliability of an item is questionable due to deficiencies or nonconformances in the Quality Assurance Program.

   c. When a systematic, independent assessment of program effectiveness or item quality, or both, is considered necessary.

   d. When it is considered necessary to verify the implementation of required corrective actions.

8. Deficiencies or nonconformances identified during an audit shall be documented and brought to the attention of the Plant Manager. Follow-up shall be performed to verify that corrective actions have been taken to correct the deficiencies or nonconformances.

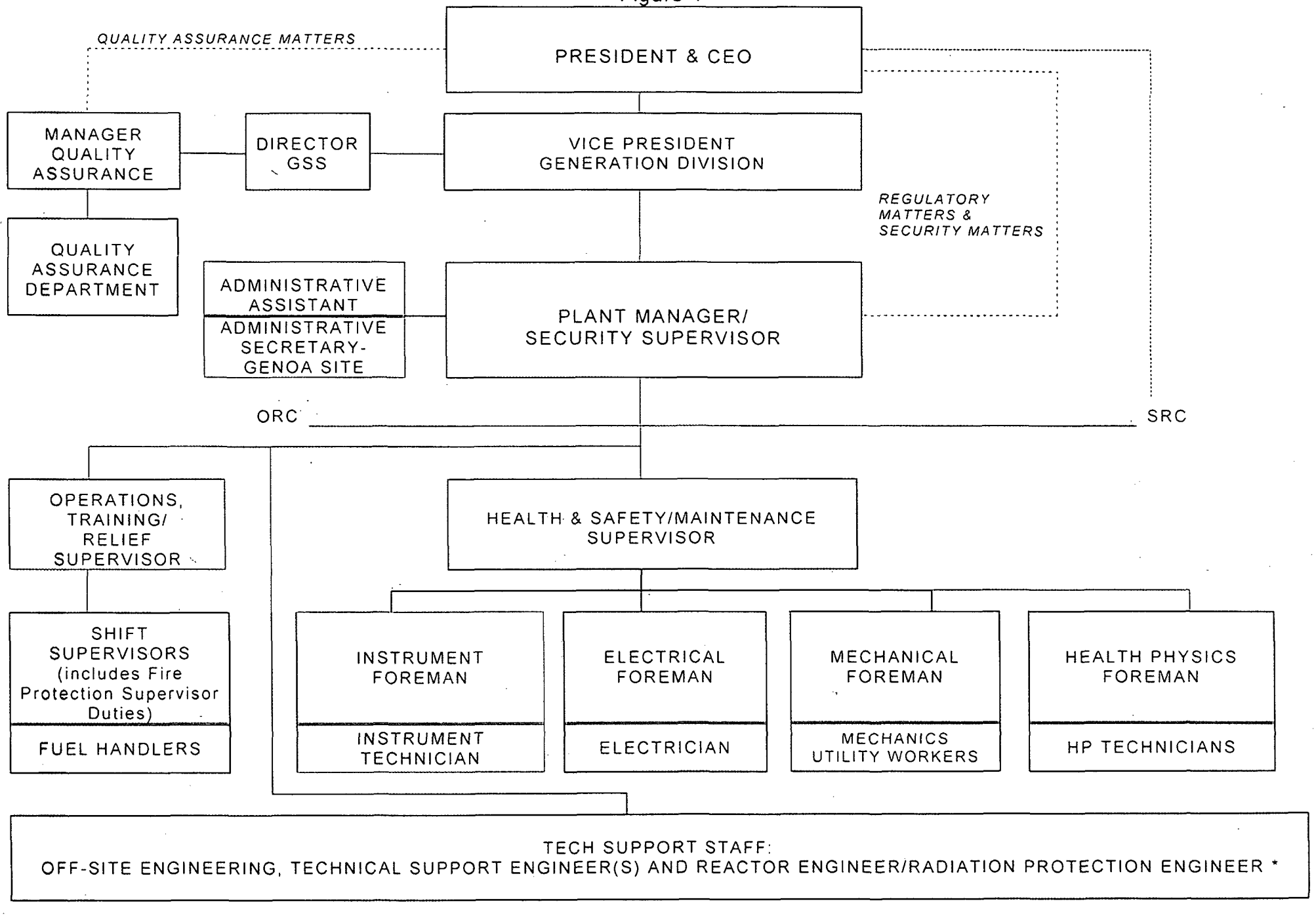
9. Audit reports are sent to DPC management for their review and assessment of the QA Program.

10. Audit reports 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.

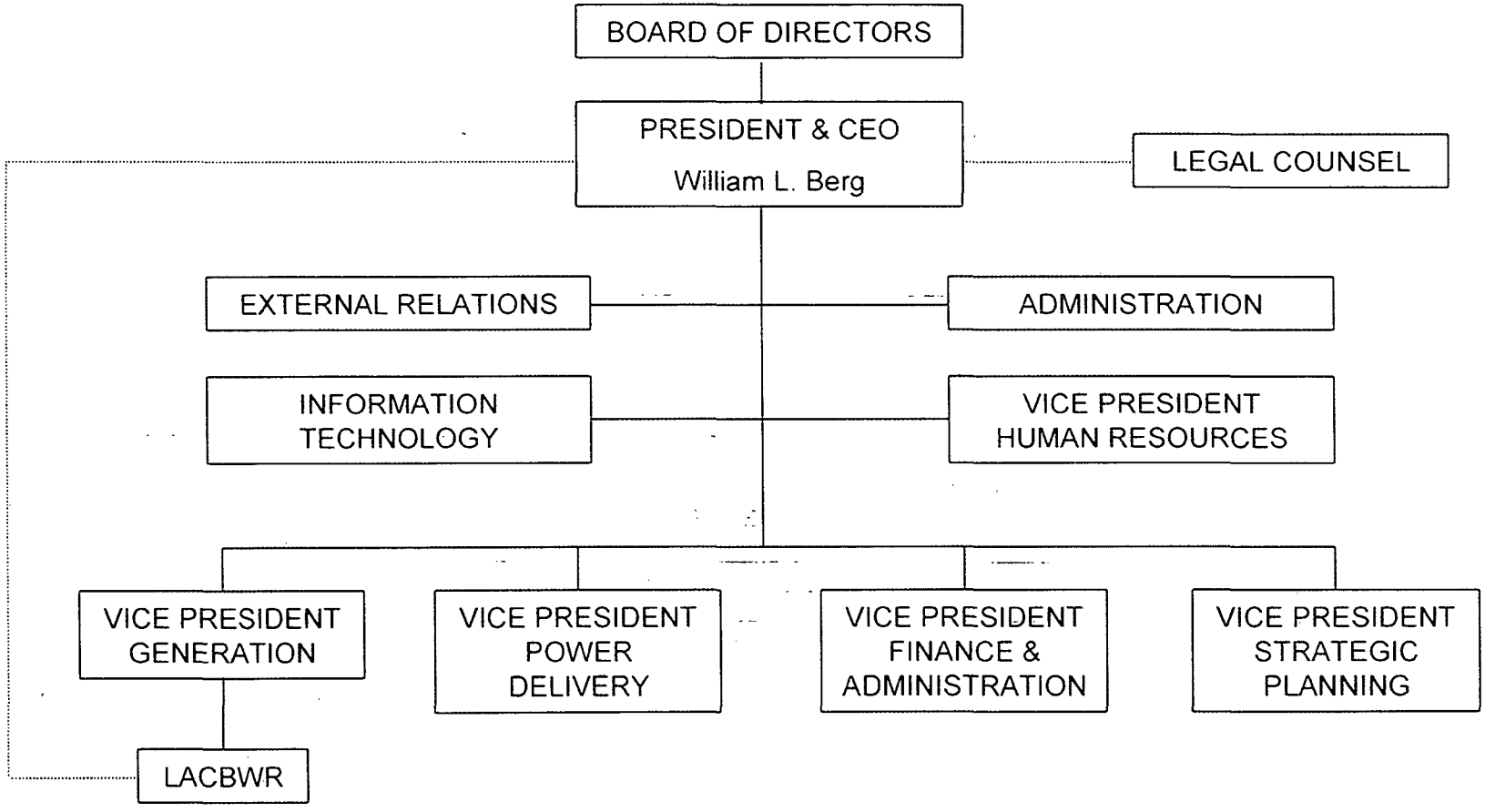
TABLE 1

LACBWR QUALITY ASSURANCE PROGRAM (SECTION)	REGULATORY GUIDE 1.33		
	IMPLEMENTING PROCEDURES	ANSI 18.7 (SECTION)	10 CFR 50 APPENDIX B (SECTION)
0.0 INTRODUCTION			
I. ORGANIZATION	ACP-02.1, ACP-03.1	1, 3.1, 3.2, 3.4.2	I
II. QUALITY ASSURANCE PROGRAM	ACP-03.1, QAI-1	3.1, 3.2, 3.3, 3.4.2, 5.1, 5.2	II
III. DESIGN CONTROL AND REVIEW	ACP-04.1, ACP-03.3, ACP-04.3	5.2.7.2	III
IV. PROCUREMENT DOCUMENT CONTROL	ACP-05.1	5.2.13.1	IV, V, VI
V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS	LACBWR OPERATING MANUAL, ACP-06.1, ACP-06.2	5.2.7, 5.3	V
VI. DOCUMENT CONTROL	ACP-06.1, 06.3, 07.1, 07.3, ECP-2, QAI-2, QAI-3	5.2.15	VI
VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES	ACP-5.0, ACP-11.1	5.2.13.2	VII, VIII
VIII. IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, & COMPONENTS	ACP-09.1, ACP-30.1	5.2.13.3	VIII
IX. CONTROL OF SPECIAL PROCESSES	ACP-10.1, ACP-10.3	5.2.12, 5.2.18	IX
X. INSPECTION	ACP-11.1	5.2.17	X
XI. TEST CONTROL	ACP-12.1	5.2.19	XI
XII. CONTROL OF MEASURING AND TEST EQUIPMENT	ACP-13.1	5.2.16	XII
XIII. HANDLING, STORAGE, & SHIPPING	ACP-30.1, IQI-2	5.2.13.4	XIII
XIV. INSPECTION, TEST AND OPERATING STATUS	ACP-2.3, ACP-11.1, ACP-12.1, ACP-15.1, ACP-15.2	5.2.6, 5.2.14	XIV
XV. NONCONFORMING MATERIALS, PARTS, OR COMPONENTS	ACP-16.0	5.2.14	XV
XVI. CORRECTIVE ACTION	ACP-16.0, ACP-17.1, 17.2, 17.3, 17.4	5.2.11	XVI
XVII. QUALITY ASSURANCE RECORDS	ACP-18.1	5.2.12	XVII
XVIII. AUDITS	ACP-3.1, QAI-6	4.5	XVIII

Figure 1



* Duties to be performed with assistance of qualified consultants when necessary.

FIGURE 2

DAIRYLAND POWER COOPERATIVE
MANAGEMENT ORGANIZATION