



DAIRYLAND POWER
C O O P E R A T I V E

NRC Docket No. 50-409

TO: NRC Washington CONTROLLED DISTRIBUTION NO. 53

FROM: LACBWR Plant Manager

2/4/2011

SUBJECT: Changes to LACBWR Controlling Documents

I. The following documents have been revised or issued new:

**LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD),
Revision 23**

Instructions:

Remove and replace Statement of Quality Assurance Policy
Remove and replace Table of Contents
Remove and replace Section 0 (pages 1-3)
Remove and replace Section I (pages 4-12)
Remove and replace Section II (pages 13-14)
Remove and replace Section III (pages 15-16)
Remove and replace Section IV (pages 17-18)
Remove and replace Section V (pages 19-21)
Remove and replace Section VI (pages 22-23)
Remove and replace Section VII (pages 24-25)
Remove and replace Section VIII (pages 26-27)
Remove and replace Section IX (pages 28-29)
Remove and replace Section X (pages 30-31)
Remove and replace Section XI (pages 32-33)
Remove and replace Section XII (pages 34-35)
Remove and replace Section XIII (pages 36-37)
Remove and replace Section XIV (pages 38-39)
Remove and replace Section XV (pages 40-41)
Remove and replace Section XVI (pages 42-43)
Remove and replace Section XVII (pages 44-46)
Remove and replace Section XVIII (pages 47-49)
Remove and replace Table 1 (page 50)
Remove and replace Figures 1 & 2: (pages 51-52)

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.

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FSME20

- 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 Please verify receipt of all listed material, destroy superseded material, and sign below to acknowledge receipt.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.]
- Update Index with pen and ink change, as appropriate.

/S/ _____ DATE _____

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

**LACBWR
QUALITY ASSURANCE PROGRAM DESCRIPTION
(QAPD)**

Revision 23

Summary and Evaluation of Changes

The below listed changes are proposed to the currently approved LACBWR QAPD with an accompanying explanation which illustrates that these changes do not present a reduction in written commitments as noted in the previous revision of the QAPD.

Statement of Quality Assurance Policy: In first paragraph of Policy Statement, the scope of the QAPD for assuring safe and reliable operation of LACBWR in SAFSTOR mode is expanded to include assuring dry cask storage activities by stating, "*and transition to an Independent Spent Fuel Storage Installation (ISFSI).*" In the final sentence of the first paragraph, 10 CFR 72, Subpart G is cited as holding applicable requirements that will be met by the QAPD. The LACBWR QAPD, which has been approved by the NRC, meets the requirements of 10 CFR 50, Appendix B. As such, the LACBWR QAPD is acceptable as stated in 10 CFR 72.140(d), and establishes a quality assurance program satisfying each of the applicable criteria of 10 CFR 72 Subpart G. The intent to apply LACBWR's previously approved quality assurance program to ISFSI activities was declared to the NRC via letter (No. LAC-14074) dated August 24, 2009. These changes represent additional commitments.

In second paragraph of Policy Statement, activities subject to QAPD applicability are expanded to include "*installation . . . and storage,*" as related to ISFSI construction and implementation of other Dry Cask Storage (DCS) project activities. This change represents an additional commitment.

In third and final paragraph of Policy Statement, "*10 CFR 72, Subpart G*" is added as holding applicable requirements addressed by the LACBWR QAPD. This change represents an additional commitment.

Section 0.0, Introduction, Part A, "General": First paragraph, "*10 CFR 72, Subpart G*" is added as applicable to the QAPD. In the first and second paragraphs, the intended scope of the QAPD is expanded to include "*the installation of an ISFSI,*" and applicable systems, structures, and components (SSCs) associated with "*a spent fuel storage installation.*" In fifth paragraph of section, groups responsible for work also include "*project management . . . installation . . . and dismantlement*" types of activity. Final sentence in section, the QA department responsibility is enhanced to assure that the QA program is being fully "*and effectively*" implemented. These changes represent additional commitments.

Section 0.0, Introduction, Part B, "Terms and Definitions": First sentence is corrected by addition of "*terms and*" definitions. This change was an editorial clarification.

The following Section 0.0, Part B terms and definitions have been changed or added:

Quality Assurance: Acronym "SSCs" is added.

QAPD, Revision 23
Summary and Evaluation of Changes

Quality Control (QC): “Quality Assurance actions” is corrected to “*quality actions.*”

Facility: Definition is clarified to encompass the site and “*plant*” systems that support SAFSTOR “*and the ISFSI site*”. The ISFSI will be located on property owned by Dairyland Power Cooperative and known as the Genoa site.

Plant: Term and definition are added to narrow that which encompasses the SSCs supporting SAFSTOR conditions.

Quality Assurance Instruction (QAI): Definition is revised to a document that governs “*quality assurance activities*” rather than “quality assurance and control activities.”

QA Manual: Definition is revised to include “*and supplemental Quality Assurance Project Plan*”.

Quality Assurance Project Plan (QAPP): Definition is given to that document which augments the QAPD and defines 10 CFR 72, Subpart G requirements applicable to DCS project activities.

Q1: Definition is removed as no longer applicable. This term was replaced by “Important To Safety”.

Important to Safety (ITS): Definitions are added for both plants ITS SSCs and DCS project ITS SSCs.

These changes generally represent additional commitments or clarifications of existing terms.

Section I, Organization, Part A, “General Requirements”:

Item 3: Order of final two paragraphs describing functions and responsibilities of Plant Manager are reversed. This change was an editorial clarification.

Item 5: The new position of “*Project Manager*” is added. The functions and responsibilities of this DCS project position are described and delineated. Items through 22 of Section I, Part A are renumbered. This change represents an additional commitment.

Item 22: The position of “*Administrative Assistant and Administrative Secretary Genoa Site*” has been changed to Administrative Staff. Additional administrative assistance is available as needed. This change clarifies supportive work assignments.

Item 24-i, 1)-11): Evaluations or audits listed, that the SRC is cognizant of, have been moved to QAPD Section XVIII, “Audits.” This change places the requirements to perform evaluations and audits in a more logical location of the QAPD and is not a reduction in commitment.

Section I, Organization, Part C, “Dairyland Power Cooperative Organization”:

In final sentence, the title, “VP Finance and Administration,” is corrected to state, “*Vice President and Chief Financial Officer.*” This change represents a title alteration.

Section II, Quality Assurance Program, Part A, “General”:

Item 5: The term “items of deficiency” is updated to current program content as “*items adverse to quality.*” The term “NRC Compliance” is corrected by “*NRC compliance.*” This change was an editorial clarification.

Item 7: New item 7 is added stating, “*Activities associated with the DCS project as supplemented by the QAPP.*” Purpose is to expand applicability of the QAPD to DCS project activities under augmented requirements contained in the QAPP. This change represents an additional commitment.

Section II, Quality Assurance Program, Part B, “Applicability”:

In first paragraph, title of 10 CFR 50, Appendix B is corrected to state, “*Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants.*” Near the end of the first paragraph, “*10 CFR 72, Subpart G, as they apply to construction and operation of an ISFSI,*” is added to QAPD requirements to expand QAPD applicability to the DCS project. A sentence is added to the end of the first paragraph to provide direction to Table 1 and states, “*Table 1 provides a matrix cross reference between this QAPD and 10 CFR 50, Appendix B, and Regulatory Guide 1.33.*” A second paragraph is added to declare, “*The LACBWR QA program utilizes the Important to Safety classification process to apply and enforce a graded approach to quality tasks related to Plant SSCs and DCS SSCs.*” Purpose of declaration is to provide quality assurance cornerstone for DCS project requirements that shall be imposed on activities that impact both DCS and Plant SSCs. This change represents an additional commitment.

Section II, Quality Assurance Program, Part C, “Implementation”:

In final sentence, clarification is added to indoctrination of QA Program requirements being also provided to facility personnel “*and contractors*” performing activities which could affect the quality of SSCs. This change represents an additional commitment.

Section III, Design Control and Review, Part A, “General”:

In first paragraph, added sentence “Design Control and Review for Important To Safety (ITS) Structures, Systems, and Components (SSCs) shall be performed by a Design Authority utilizing their approved 10CFR50 Appendix B Quality Assurance Program.

In second paragraph, design and fabrication of shipping casks as being beyond scope of QAPD is clarified to include “*storage and*” shipping casks. This change is a clarification of an existing commitment.

Section III, Design Control and Review, Part B, “Responsibilities”:

Item 1: Responsibility for establishing procedure to implement design control is changed from “Quality Assurance Department” to “*LACBWR Staff*”. Enhancement of the work

control process at LACBWR to better support DCS project management has created new positions and responsibilities. Work control process enhancement has created the LACBWR Staff position of *“Work Analyst”* responsible for *“the incorporation of approved design documents into work orders,”* procedures, and instructions. The position of “job coordinator” is no longer applicable. The requirements were moved from Item 3 to Item 1. This change is an expansion of a current commitment.

Item 2: The requirements for QA review previously in Item 1 have been moved to Item 2 as follows; The Quality Assurance Department is responsible to review design drawings, specifications, calculations, and procurement documents to assure that quality standards are included or referenced. This change will ensure the QA Department’s ability to independently overview design activities. This change is a clarification of an existing commitment.

Item 3: *“Design Authority”* replaces “job coordinator” and is responsible for *“the incorporation of design bases, regulatory requirements, codes and standards into drawings and specifications related to ITS design.”* This change represents an additional commitment.

Item 4: The work control process has been updated to better support DCS project management and other plant activities as designated by the Plant Manager. The Operations Review Committee (ORC) remains responsible for reviewing all proposed changes. The word “facility” has been removed from the first sentence. This change is an expansion of a current commitment.

Item 6: Safety Review Committee (SRC) responsibility of independent review has been modified to *“changes to the facility”* replacing review of “facility changes.” This change represents a clarification of the process.

Section III, Design Control and Review, Part C, “Requirements”:

Item 1: The work control process has been upgraded to better support DCS project management. Item is changed to show that the work control process is implemented by assembly and use of a *“Work Order”* for plant modifications *“and ISFSI activities”* as well. *“Work Orders”* may be initiated by any knowledgeable person. This change is an expansion of a current commitment.

Item 2: For modifications to unnecessary systems, a change is made to state a control procedure *“or process”* shall be used. Future decommissioning activities may be wide in scope and involve dismantlement of large areas or deconstruction of whole buildings and structures. This change is an expansion of a current commitment.

Item 3: Change is made to expand intent of item to include *“and ISFSI activities”* removed responsibilities from this section as they are already described in Part B. Change of location within paragraph made to *“quality standards and requirement”* to improve readability. This change is an expansion of a current commitment.

Item 4: The work control process has been upgraded to better support plant activities and DCS project management. Design and modification controls are implemented by use of

the Owner's Acceptance Review and Work Control procedures which requires ITS design activities to be performed by a Design Authority. This change is an expansion of a current commitment.

Section IV, Procurement Document Control, Part A, "General":

In first sentence, "Q1" is no longer applicable and is replaced by "ITS" representing Important to Safety items that are being covered by the controls that are established in the QAPD. This change is a clarification of a current commitment.

Section IV, Procurement Document Control, Part B, "Responsibilities":

Item 1: Responsibility for establishing procedures to control procurement is changed from "Quality Assurance Department" to "LACBWR Staff." This change will ensure the QA Department's ability to independently overview procurement control activities. This change is a clarification of an existing commitment.

Item 3: Engineering staff is changed to "Design Authority" as having responsibility for preparing engineering specifications. This change is a clarification of an existing commitment.

Item 4: "Engineering" is changed to "LACBWR Staff" as being responsible for preparing purchase requisition worksheets. This change is a clarification of an existing commitment.

Item 5 was previously numbered Item 4. Wording remains unchanged.

Section IV, Procurement Document Control, Part C, "Requirements":

Item 4: In first sentence, "10 CFR 72, Subpart G" is added as applicable to quality assurance programs of suppliers providing material and services to LACBWR. This change is an additional commitment.

Section V, Instructions, Procedures, and Drawings, Part A, "General":

Stated activities are expanded to include "and ISFSI activities" as being performed in accordance with approved procedures. This change is an additional commitment.

Section V, Instructions, Procedures, and Drawings, Part B, "Responsibilities":

Item 1: Responsibility for preparing procedures to implement the QAPD is changed from "Quality Assurance Department" to "LACBWR Staff." This change will ensure the QA Department's ability to independently overview activities associated with the preparation of instructions, procedures, and drawings. This change is a clarification of an existing commitment.

Section V, Instructions, Procedures, and Drawings, Part C, "Requirements":

Item 1: Detailed instruction for operation is expanded to include “*and ISFSI activities*” that shall be contained in procedures. This change is an additional commitment.

Item 5: In second sentence “facility” is removed as unnecessary before the phrase “management staff.” This change is an editorial revision.

Section VI, Document Control, Part B, “Responsibilities”:

Item 1: Responsibility for preparing document control procedures to implement the QAPD is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure the QA Department’s ability to independently overview document control activities. This change is a clarification of an existing commitment.

Item 3: Responsibility for “*the preparation of*” a standard drawing control procedure is appropriately changed from the “DPC Drawing Control Specialist” to the “*Plant Manager.*” This change is a clarification of an existing commitment.

Section VI, Document Control, Part C, “Requirements”:

Item 4: Title has been changed in the Organization Section to Administrative Staff from Administrative Assistant/Administrative Secretary-Genoa Site. This changes does not represent a reduction in commitment.

Section VII, Control of Purchased Material, Equipment, and Services, Part B, “Responsibilities”:

Item 3: Responsibility for evaluating performance of material and equipment in service is expanded beyond the Operations Department to also include “*and LACBWR Staff.*” This change is an expansion of a current commitment.

Section VII, Control of Purchased Material, Equipment, and Services, Part C, “Supplier Qualification”:

Item 2: Owner acceptance of QA program is added for suppliers of casks for radioactive material. The casks must be designed and fabricated under the control of an NRC-approved “*and DPC-accepted*” QA program. This change is an additional commitment.

Section VII, Control of Purchased Material, Equipment, and Services, Part E, “Receiving Inspection”:

Item 1: An alternate is added for the examination of items that is to be performed by Materials Management “*or appropriately trained Project staff*” upon receipt. This change is an expansion of a current commitment.

Section VIII, Identification and Control of Materials, Parts, and Components, Part A, “General”:

Material control occurs from receipt at the “*facility.*” Term is changed from the “plant” to be more appropriate. This change is a clarification of current terms.

Section VIII, Identification and Control of Materials, Parts, and Components, Part B, “Responsibilities”:

Item 1: Responsibility for material control procedures is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure the QA Department’s ability to independently overview the control of materials, parts, and components activities. This change is an expansion of a current commitment.

Item 2: Plant Manager’s responsibility for material control procedures is corrected to state, “shall approve and *ensure implementation of* procedures” instead of approve and “implement.” This change is a clarification of an existing commitment.

Item 3: An alternate is added for material control that is to be performed by Materials Handling Department “*or appropriately trained project staff.*” This change is an expansion of a current commitment.

Section X, Inspection, Part A, “General”:

It is added that the inspection program is established for possession-only “*and ISFSI*” activities. This change is an additional commitment.

Section X, Inspection, Part B, “Responsibilities”:

Item 1: Responsibility for assuring inspection requirements are included in specifications is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure the QA Department’s ability to independently overview inspection design activities. This change is a clarification of an existing commitment.

Item 3 and 4: Item 3 is divided at “Plant Manager approves inspection procedures.” Item 4 is added such that “*The Plant Manager shall assure sufficient inspections are performed to provide adequate confidence that activities meet predetermined requirements.*” Two different responsibilities contained in one item are addressed in two separate items. This change is a clarification of an existing commitment.

Section XI, Test Control, Part B, “Responsibilities”:

Item 1: Responsibility for establishing test control requirements is changed from “Quality Assurance Department” to “*LACBWR Staff.*” It is added that the test program shall also include “*installation testing.*” Responsibility is expanded to include DCS project activities. This change will ensure the QA Department’s ability to independently overview test activities. This change is a clarification of an existing commitment.

Item 4: Similar addition is made for DCS project test requirements following “*or installation activities.*” Review of test results is required following modifications “*to the plant.*” This change is a clarification of an existing commitment.

Section XII, Control of Measuring and Test Equipment, Part B, “Responsibilities”:

Item 1: Responsibility for establishing test equipment calibration control requirements is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure the QA Department’s ability to independently overview calibration activities. This change is a clarification of an existing commitment.

Item 2: Test Equipment is capitalized. This change is editorial in nature.

Item 3: Plant Manager’s responsibility for this section of QAPD is corrected to state, “*ensuring implementation of*” rather than “responsible for implementing.” This change is a clarification of an existing commitment.

Section XIII, Handling, Storage, and Shipping, Part B, “Responsibilities”:

Item 1: Responsibility for handling, storage, and shipping material requirements is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure QAD’s ability to independently overview handling, shipping and storage activities. This change is a clarification of an existing commitment.

Item 2: Plant Manager’s responsibility for this section of QAPD is corrected to state, “*ensuring implementation of*” rather than “responsible for implementing.” This change is a clarification of an existing commitment.

Section XIV, Inspection, Test, and Operating Status, Part B, “Responsibilities”:

Item 1: Responsibility for operating equipment status requirements is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure the QA Department’s ability to independently overview inspection, test, and operating status activities. Plant Manager’s responsibility for control of facility status is changed more appropriately during modifications to “*The LACBWR Staff. . . to the plant.*” This change is a clarification of an existing commitment.

Section XIV, Inspection, Test, and Operating Status, Part C, “Requirements”:

Item 5: Item is changed to state simply “*Maintenance, repair, or modification of plant components, systems, or structures . . .*” This change is a clarification of an existing commitment.

Item 6: Item is expanded to include “*and/or Work Orders*” documenting work performed at “*the plant.*” This change is a clarification of an existing commitment.

Section XV, Nonconforming Materials, Parts, or Components, Part B, “Responsibilities”:

Item 1: Responsibility for control, evaluation, and disposition of nonconforming items is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure the QA Department’s ability to independently overview the identification of nonconforming condition activities. This change is a clarification of an existing commitment.

Item 2: “Engineering Staff” is replaced by “*LACBWR Staff*” in two places for review responsibilities. This change is an expansion of an existing commitment.

Section XV, Nonconforming Materials, Parts, or Components, Part C, “Requirements”:

Item 2: In first sentence, clarification is added by “*For vendor supplied items or services,*” the vendor shall be notified. In second sentence, responsibility for coordinating the disposition of deficient items is corrected by “*LACBWR Staff with assistance from Purchasing shall be responsible.*” This change is a clarification of an existing commitment.

Item 3: “Engineering Staff” is replaced appropriately by “*LACBWR Staff*” in the first sentences for review responsibilities. “*LACBWR Staff*” replaces “QA” for ensuring procedure availability in the fourth sentence. This change will ensure the QA Department’s ability to independently overview nonconforming activities. In the fifth and final sentence “*The QA Department*” shall re-inspect all repaired or reworked items. This change is an expansion of a current commitment and a clarification of an existing commitment.

Section XVI, Corrective Action, Part B, “Responsibilities”:

Item 1: Responsibility for establishing procedures is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure the QA Department’s ability to independently overview corrective action activities. This change is a clarification of an existing commitment.

Item 3: “Engineering Staff” is replaced appropriately by “*LACBWR Staff*” for review responsibilities. LACBWR Staff includes the on-site technical staff, the DPC Corporate Engineering staff, and DCS Design Authorities. This change is a clarification of an existing commitment.

Section XVI, Corrective Action, Part C, “Requirements”:

Item 3: First and second sentences are combined and corrected for grammar by stating “shall be identified *on a CAR which* shall be initiated.” This change is editorial in nature.

Item 4: Maintenance Request process is linked to Corrective Action Program by stating “*The Maintenance Request process can create documented CARs.*” Maintenance Requests are monitored for adverse trends and may require corrective action to be taken for maintenance deficiencies. This is an additional commitment.

Section XVII, Quality Assurance Records, Part A, “Responsibilities”:

Records maintenance is expanded for DCS project activities to include “*installation*” documents and records. This is an additional commitment.

Section XVII, Quality Assurance Records, Part B, “Responsibilities”:

Item 1: Responsibility for requirements of this section is changed from “Quality Assurance Department” to “*LACBWR Staff.*” This change will ensure the QA Department’s ability to independently overview records activities. This change is a clarification of an existing commitment.

Item 2: Plant Manager’s responsibility for this section of QAPD is corrected to state, “*ensuring implementation of*” rather than “responsible for implementing.” This change is a clarification of an existing commitment.

Section XVII, Quality Assurance Records, Part E, “Record Retention”:

Item 2a: Retention of modification packages is expanded to include “*and work order packages*” as a result of implementing work control process. This change is an additional commitment.

Item 2h: “LACBWR Decommissioning Order . . .” is removed as redundant. Order required compliance with 10 CFR 50.59. Retention of *10 CFR 72.48* reviews is also added. This change is an editorial clarification of an existing commitment and an additional commitment.

Item 2j: Decommissioning and Dismantlement are not capitalized as was previously. This change is editorial in nature.

Section XVIII, Audits, Part B, “Responsibilities”:

Item 1: Added the responsibilities of the SRC to read “*The Safety Review Committee performs independent reviews and audits to verify that the facility is being maintained consistent with company safety, administrative, and licensing provisions. These evaluations of facility activities shall be performed by the Quality Assurance Department or a qualified offsite entity under the cognizance of the SRC.*” This change is a clarification of an existing commitment.

Section XVIII, Audits, Part C, “Requirements”:

Item 6: Item is expanded to include audits formally listed in Section I, Organization, Part A, “General Requirements,” Item 24. Evaluations or audits listed, that the SRC is cognizant of, have been added to requirements for this section, “Audits” by stating, “*and shall include, at a minimum, the following areas:*”

- a. *The conformance of facility operation to provisions contained within the Appendix "A" Technical Specifications and applicable license conditions at least once per 24 months.*
- b. *The performance, training and qualifications of the entire facility staff at least once per 24 months.*
- c. *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.*

- d. 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.*
- e. The Emergency Plan and implementing procedures at least once per 12 months.*
- f. The Contingency Plan, the Security Plan and implementing procedures, at least once per 12 months.*
- g. The Fire Protection Program and implementing procedures at least once per 24 months.*
- h. A fire protection and loss prevention inspection and audit shall be performed at least once per 24 months.*
- i. The ODCM and Radiological Environmental Monitoring Program and results at least once per 12 months.*
- j. The Radiation Protection Program and the Process Control Program, and implementing procedures, at least once per 12 months.*
- k. Any other area of facility operation considered appropriate by the SRC or the President & CEO."*

This change is a clarification of an existing commitment.

Table 1:

ACP-07.7 has been added to Section VI Document Control as a new document control procedure. This is not a reduction in commitment.

QAI-6 has been removed from Section XVIII Audits as it has been cancelled with the requirements being included in ACP-03.1. This is not a reduction in commitment.

Organization charts changed to reflect changes made in Section I. This is not a reduction in commitment.

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 and transition to an Independent Spent Fuel Storage Installation (ISFSI). 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 and Title 10 of the Code of Regulations, Part 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste, Subpart G, "Quality Assurance".

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, installation, operations, maintenance, repair, fuel handling and storage, 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 and implementation of a Quality Assurance Program which meets the requirements of 10 CFR 50, Appendix B, and 10 CFR 72, Subpart G.

William L Berg
(President & CEO)

19 Nov. 2010
(Date)

QUALITY ASSURANCE PROGRAM DESCRIPTION

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REV'D: <u> <i>R. L. Egg</i> </u> <u> 10/29/10 </u> Manager, QA Date REV'D: <u> <i>M. A. 2nd</i> </u> <u> 10/31/10 </u> Plant Manager Date	APPROVED: <u> <i>William Z Berg</i> </u> <u> 11/19/10 </u> President & CEO Date

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, 10 CFR 72, Subpart G and reflects the direction of applicable regulatory guides and industry standards, as they apply to a possession-only condition, and the installation of an ISFSI, 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 and a spent fuel storage installation. 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 project management, engineering, design, procurement, installation, maintenance, testing, and dismantlement 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 and effectively implemented.

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B. Terms and Definitions

The terms and 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 structures, systems, or components (SSCs) will perform satisfactorily in service.

QUALITY CONTROL (QC) - Those quality 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 plant systems which support a possession-only license (SAFSTOR) condition and the ISFSI site, but excludes electric power transmission apparatus located beyond the site switchyard.

PLANT – Encompasses the SSCs which support a possession-only license (SAFSTOR) condition.

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 activities.

QA MANUAL - Manual comprised of the QA Program Description and supplemental Quality Assurance Project Plan.

QUALITY ASSURANCE PROJECT PLAN (QAPP) – A documented plan that defines the Quality Assurance program requirements applicable to the Dry Cask Storage (DCS) project including licensing, siting, site design, procurement, vendor selection, fabrication, shipping, receiving, storing, cleaning, erecting, site installation, inspecting, testing, cask loading, cask sealing, cask handling, preparation for ISFSI operation, and associated plant modification activities. This Plan may also be utilized for other site activities as designated by the Plant Manager.

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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.

IMPORTANT TO SAFETY (ITS) – A classification given to SSCs that provide nuclear safety functions.

10 CFR 50 nuclear safety functions of LACBWR Plant ITS SSCs are:

- Maintain the conditions required to store spent fuel safely,
- Prevent damage to the spent fuel container during handling and storage, and
- Provide reasonable assurance that spent fuel can be handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.

10 CFR 71 and 10 CFR 72 nuclear safety functions of Independent Spent Fuel Storage Installation (ISFSI) ITS SSCs are:

- Maintain sub-criticality,
- Maintain confinement,
- Ensure that radiation dose rates and dose to workers and the public do not exceed acceptable levels (and remain ALARA),
- Maintain retrievability, and
- Maintain heat removal capability (as necessary to meet the above criteria).

LACBWR Plant or ISFSI SSCs, tasks, and hardware determined to be ITS are further categorized into one of three quality assurance classification categories: ITS-A, ITS-B, or ITS-C.

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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.

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. Project Manager (PM), when required, reports directly to the Plant Manager on all DCS project activities and is responsible for the implementation of the QAPP for the duration of the DCS project and other site activities as designated by the Plant Manager. He has full authority and accountability for successful project planning and execution including effective implementation of the QAPP. The PM is responsible for contract management and development of contract deliverables in accordance with quality requirements defined in the QAPP. The PM is responsible for ensuring that applicable project quality and technical requirements are transmitted to, addressed by, and acceptably implemented by the project's subcontractors.
6. 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.
7. Director, Generation Support Services, reports directly to the VP, Generation Division, and has corporate oversight of the QA Department.
8. 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.

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9. 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.
10. 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.
11. Fire Protection Supervisor reports directly to the Plant Manager and is responsible for the administration and implementation of LACBWR's fire protection program.
12. 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.
13. 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.
14. 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.
15. 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.
16. 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.

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17. 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.
18. 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.
19. 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.
20. 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.
21. 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.
22. Administrative Staff reports directly to the Plant Manager and is responsible for maintenance of LACBWR's QA records, procedures, and indexes.
23. The Operations Review Committee (ORC) 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 (SRC).
 - 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

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- 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 ORC 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 plant 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 plant 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.

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- 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 (SRC) 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.

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- b. The SRC shall be composed of a Chairman and a minimum of three members who are appointed by 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.

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- 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.

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- i. Evaluations of plant activities performed by the Quality Assurance Department or a qualified off-site entity under the cognizance of the SRC. Refer to Section 18.C.6 for scheduled audit activities.
- j. The SRC shall report to and advise the President & CEO on those areas of responsibility listed in paragraphs 24.h and 24.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 Vice President and Chief Financial Officer.

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REV'D: <u><i>William L Berg</i></u> <u>11/19/10</u> Plant Manager Date	<u><i>William L Berg</i></u> <u>11/19/10</u> President & CEO Date	

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 adverse to quality 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.
7. Activities associated with the DCS project as supplemented by the QAPP.

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B. Applicability

The LACBWR QA Program is based on the requirements of 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing 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 and 10 CFR 72, Subpart G, as they apply to construction and operation of an ISFSI. Table 1 provides a matrix cross reference between the QAPD and 10 CFR 50, Appendix B, and Regulatory Guide 1.33.

The LACBWR QA program utilizes the Important To Safety classification process to apply and enforce a graded approach to quality in tasks related to Plant SSCs and DCS SSCs.

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 and contractors performing activities which could affect the quality of components, systems, or structures.

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REV'D: <u><i>[Signature]</i></u> <u>10/29/10</u> Manager, QA Date	APPROVED:	
REV'D: <u><i>[Signature]</i></u> <u>10/31/10</u> Plant Manager Date	<u><i>William L Berg</i></u> <u>11/19/10</u> President & CEO Date	

III. DESIGN CONTROL AND REVIEW

A. General

This section establishes the requirements to assure that the Structures, Systems, and Components (SSCs) 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 SSCs. Design control and review for Important to Safety (ITS) SSCs shall be performed by a Design Authority utilizing their approved 10CFR50 Appendix B Quality Assurance Program.

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

B. Responsibilities

1. The LACBWR Staff is responsible for establishing procedures to implement design control and the incorporation of design documents into work orders, procedures and instructions.
2. The Quality Assurance Department is responsible for the review of design drawings, specifications, calculations, and procurement documents to assure that quality standards are included or referenced.
3. The Design Authority is responsible for the incorporation of design bases, regulatory requirements, codes and standards into drawings and specifications related to ITS SSCs design and changes thereto.
4. The Operations Review Committee is responsible for reviewing all proposed changes and recommending approval or disapproval to the Plant Manager. The review shall determine whether the proposed modifications require prior NRC approval.

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5. The Plant Manager is responsible for reviewing the recommendations of the Operations Review Committee and taking appropriate action. If prior approval is needed, 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 changes to the facility. They shall provide assurance that the modification meets the design bases, regulatory requirements, and applicable codes and standards.

C. Requirements

1. A Work Order shall be initiated for all modifications to ITS SSCs and systems maintained operational during SAFSTOR and ISFSI activities. Work Orders may be initiated by any knowledgeable person.
2. A control procedure or process 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 and specify appropriate quality standards and requirements for all proposed plant modifications to ITS SSCs and systems maintained operational during SAFSTOR and ISFSI activities. These conditions shall be incorporated into drawings, specifications, procurement documents, and procedures.
4. The Owner's Acceptance Review procedure and Work Control procedure shall describe and control design changes to ITS SSCs and ISFSI activities.
5. All proposed modifications shall be reviewed to determine whether they require prior NRC approval.

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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 and 10 CFR 72, Subpart G. 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.

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C. Requirements

1. Detailed instruction for possession-only operation of the plant and ISFSI activities 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.

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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 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.

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REV'D: <u><i>D. L. Egg</i></u> <u>10/29/10</u> Manager, QA Date	APPROVED:	
REV'D: <u><i>Pat [unclear]</i></u> <u>10/31/10</u> Plant Manager Date	<u><i>William Z Berg</i></u> <u>11/19/10</u> President & CEO Date	

VI. DOCUMENT CONTROL

A. GENERAL

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

B. RESPONSIBILITIES

1. The LACBWR Staff 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 during SAFSTOR operations. He is further responsible for the assurance that approved drawings, procedures, and other pertinent documents are incorporated in the LACBWR Operating Manual.
3. The Plant Manager is responsible for preparation of 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.

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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 Staff 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.

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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 or appropriately trained project staff 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.

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REVD: <u><i>DeL. Egg</i></u> <u>10/29/10</u> Manager, QA Date REVD: <u><i>Misner</i></u> <u>10/31/10</u> Plant Manager Date	APPROVED: <u><i>William L Berg</i></u> <u>11/19/10</u> President & CEO Date

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 facility through installation or use.

B. Responsibilities

1. The LACBWR Staff 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 ensure implementation of procedures for the identification and control of materials, parts, and components.
3. The Materials Handling Department or appropriately trained project staff of DPC is responsible for control of, identification, and issuance of all material, parts, and components.

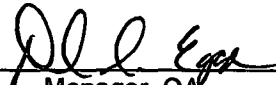

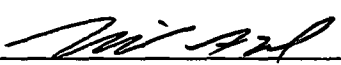
C. Requirements

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.

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3. 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.

4. 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.

<p style="text-align: center;"> DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION </p>	SECTION IX	REV. NO. 23
	CONTROL OF SPECIAL PROCESSES	
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REVD:  <u>10/29/10</u> Manager, QA Date	APPROVED:  <u>11/19/10</u> President & CEO Date	
REVD:  <u>10/31/10</u> Plant Manager Date		

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.

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

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	INSPECTION	
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REV'D: <u> <i>William T Berg</i> </u> <u> 10/31/10 </u> Plant Manager Date	<u> <i>William T Berg</i> </u> <u> 11/19/10 </u> President & CEO Date	

X. INSPECTION

A. General

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

B. Responsibilities

1. The LACBWR Staff 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.
4. The Plant Manager shall ensure sufficient inspections are performed to provide adequate confidence that activities meet predetermined requirements.

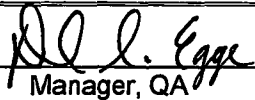


C. Requirements

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.

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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.

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	TEST CONTROL	
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REV'D: <u></u> <u>10/31/10</u> Plant Manager Date	<u></u> <u>11/19/10</u> President & CEO Date	

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 LACBWR Staff is responsible for establishing the requirements to control the test program. The test program shall include, but not be limited to, surveillance testing, installation 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 or installation activities. They also shall review and approve test results for testing following modifications to the plant.
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.

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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.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION XII REV. NO. 23
	CONTROL OF MEASURING AND TEST EQUIPMENT
	DATE 10/28/10 PAGE 1 OF 2
REV'D: <u><i>D. L. Egg</i></u> <u>10/29/10</u> Manager, QA Date	APPROVED:
REV'D: <u><i>M. J. M.</i></u> <u>10/31/10</u> Plant Manager Date	<u><i>William L Berg</i></u> <u>11/19/10</u> President & CEO Date

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 LACBWR Staff 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 ensuring implementation of 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.

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	CONTROL OF MEASURING AND TEST EQUIPMENT	
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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.

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	HANDLING, STORAGE AND SHIPPING
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REV'D: <u><i>D. L. Egg</i></u> 10/29/10 Manager, QA Date	APPROVED:
REV'D: <u><i>M. J. ...</i></u> 10/31/10 Plant Manager Date	<u><i>William Z Berg</i></u> 11/19/10 President & CEO Date

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 LACBWR Staff 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 ensuring the implementation of 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.

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	HANDLING, STORAGE AND SHIPPING
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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.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION XIV REV. NO. 23
	INSPECTION, TEST, AND OPERATING STATUS
	DATE 10/28/10 PAGE 1 OF 2
REV'D: <u><i>D.L. Egge</i></u> <u><i>10/29/10</i></u> Manager, QA Date	APPROVED: <u><i>William Z Borg</i></u> <u><i>11/19/10</i></u> President & CEO Date
REV'D: <u><i>M. A. H.</i></u> <u><i>10/31/10</i></u> Plant Manager Date	

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 LACBWR Staff 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 LACBWR Staff is also responsible for the control of facility status during modifications to the plant.
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.

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	INSPECTION, TEST, AND OPERATING STATUS	
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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. Maintenance, repair, or modification of plant 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 and/or Work Orders shall be used to originate, approve, authorize, and document all non-routine maintenance or repair work performed at the plant.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION XV REV. NO. 23
	NONCONFORMING MATERIALS, PARTS, OR COMPONENTS
REVD: <u><i>D.L. Egge</i></u> <u>10/29/10</u> Manager, QA Date REVD: <u><i>Mira</i></u> <u>10/31/10</u> Plant Manager Date	DATE 10/28/10 PAGE 1 OF 2 APPROVED: <u><i>William Berg</i></u> <u>11/19/10</u> President & CEO Date

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 LACBWR Staff shall be responsible for establishing a procedure for the control, evaluation, and disposition of deficient materials, parts, and components.
2. The LACBWR Staff is responsible for reviewing nonconforming items that cannot be corrected by vendor action and recommending disposition. The LACBWR 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. For vendor supplied items or services, the vendor shall be notified of all nonconforming items and requested to correct the deficiency. LACBWR Staff with assistance from Purchasing shall be 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.

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	NONCONFORMING MATERIALS, PARTS, OR COMPONENTS	
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3. Deficiencies which cannot be corrected by the vendor shall be reviewed by the LACBWR Staff. The LACBWR 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. LACBWR Staff shall ensure that documented and approved procedures are available prior to repair or rework. The QA Department 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.

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REVD: <u><i>M. F. 20</i></u> <u>10/31/10</u> Plant Manager Date	<u><i>William L Berg</i></u> <u>11/19/10</u> President & CEO Date

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 LACBWR Staff 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 LACBWR 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.

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	CORRECTIVE ACTION	
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3. Nonconforming materials, parts, or components shall be identified by a CAR which 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. The Maintenance Request process can create documented CARs.
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.

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	QUALITY ASSURANCE RECORDS
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REV'D: <u><i>D. L. Egge</i></u> <u>10/29/10</u> Manager, QA Date	APPROVED: <u><i>William L Berg</i></u> <u>11/19/10</u> President & CEO Date
REV'D: <u><i>Mike</i></u> <u>10/21/10</u> Plant Manager Date	

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, installation, repair, and modification of structures, systems, and components covered by the Quality Assurance Program Description.

B. Responsibilities

1. The LACBWR Staff is responsible for establishing the requirements of this section.
2. The Plant Manager is responsible for approving and ensuring implementation of 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.

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	QUALITY ASSURANCE RECORDS	
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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 and work order packages.
 - b. Records of new and irradiated fuel inventory, fuel transfers and assembly burn-up histories.

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- 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 10 CFR 50.59 and 10 CFR 72.48.
- i. Records of meetings of the ORC and the SRC.
- j. Records of decommissioning and/or dismantlement of the facility.

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	AUDITS	
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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 and shall include, at a minimum, the following areas:
 - a. The conformance of facility operation to provisions contained within the Appendix "A" Technical Specifications and applicable license conditions at least once per 24 months.
 - b. The performance, training and qualifications of the entire facility staff at least once per 24 months.
 - c. 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.
 - d. 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.
 - e. The Emergency Plan and implementing procedures at least once per 12 months.
 - f. The Contingency Plan, the Security Plan and implementing procedures, at least once per 12 months.
 - g. The Fire Protection Program and implementing procedures at least once per 24 months.
 - h. A fire protection and loss prevention inspection and audit shall be performed at least once per 24 months.
 - i. The ODCM and Radiological Environmental Monitoring Program and results at least once per 12 months.

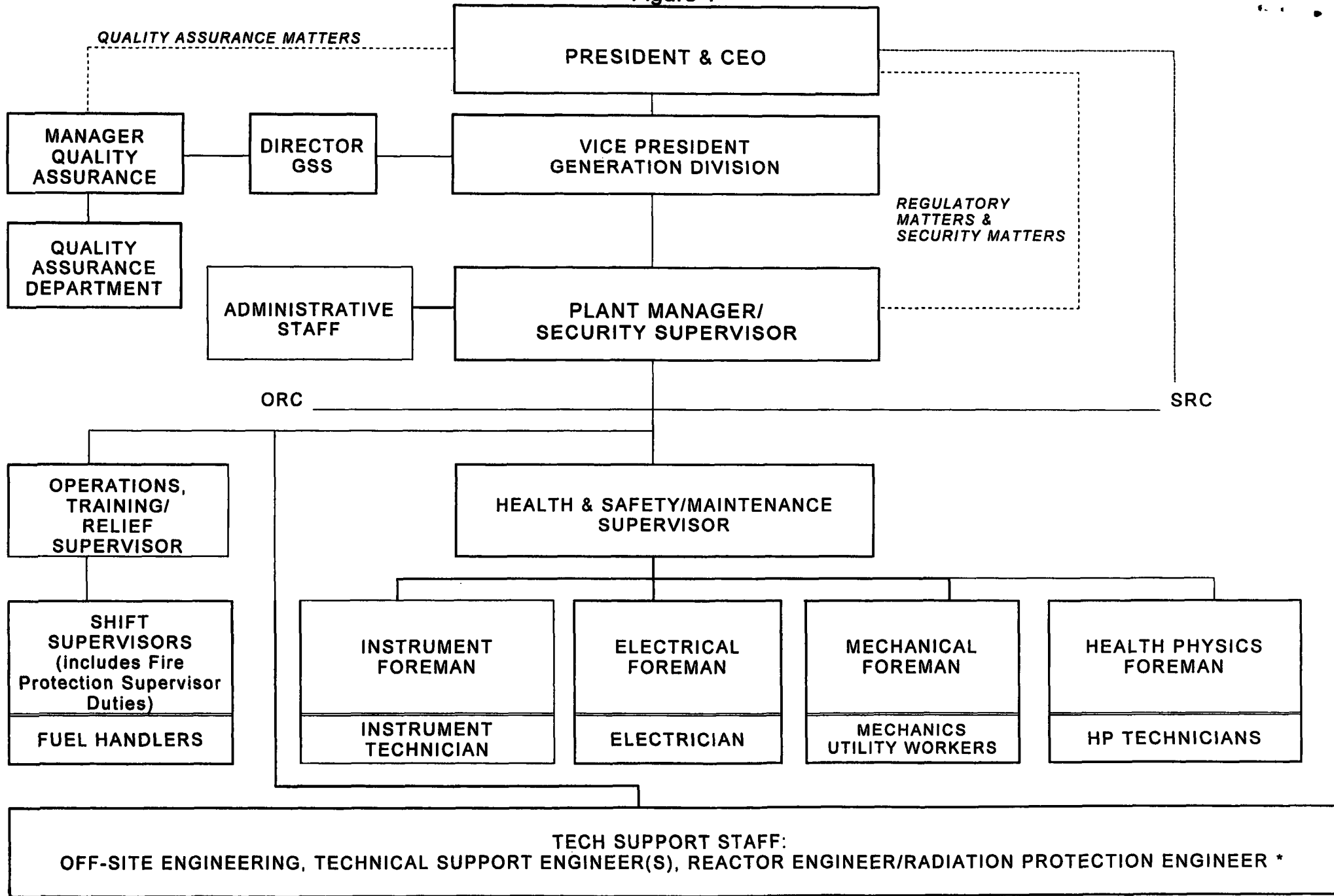
DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION XVIII	REV. NO. 23
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- j. The Radiation Protection Program and the Process Control Program, and implementing procedures, at least once per 12 months.
 - k. Any other area of facility operation considered appropriate by the SRC or the President & CEO.
- 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, 07.7, 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	4.5	XVIII

Figure 1



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

FIGURE 2

DAIRYLAND POWER COOPERATIVE
MANAGEMENT ORGANIZATION

