OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION

KEWAUNEE NUCLEAR POWER PLANT

WISCONSIN PUBLIC SERVICE CORPORATION

Revision 4
June 11, 1984

INTRODUCTION

The policy of Wisconsin Public Service Corporation is to comply with the requirements of the Operational Quality Assurance Program (OQAP) which is authorized under the direction of the Vice President-Power Production. The OQAP fulfills the requirements of 10CFR50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." Compliance with the OQAP is mandatory for Wisconsin Public Service Corporation employees and equivalent measures appropriate to the circumstance shall be enforced upon suppliers of materials, equipment or services. 4

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

1.0 ORGANIZATION

1.1 General Requirements

All members of the organization involved in operation of the Kewaunee Nuclear Power Plant shall be made aware of and recognize the necessity for well formulated and detailed administrative controls to assure safe and efficient operation. Lines of authority, responsibility and communication are established under the direction of the Vice President-Power Production and identify all levels of management involved in the OQAP, (See Figures 1 & 2). The quality assurance functions performed by each organizational element are cited in the descriptions below. 4

1.2 Duties and Responsibilities

Vice President-Power Production

He has corporate responsibility for all matters relating to the administration, engineering, design, manufacture, construction, installation, maintenance, modification, test, start-up, licensing, training programs, commercial operation and quality assurance of the Kewaunee Nuclear Power Plant. Under his authority the Operational Quality Assurance Program is implemented.

Superintendent-Power Plant Design and Construction

He is responsible to the Vice President-Power Production for ensuring that an Operational Quality Assurance Program is developed, implemented and maintained to meet the licensing requirements. He also has responsibility for providing engineering support for plant modifications. He has delegated his authority and responsibility for providing engineering support of plant modifications to the Power Plant Design Supervisor. He has delegated his authority and responsibility for implementation of Quality Assurance activities to the Quality Assurance Supervisor. He is responsible for final review and approval of changes to the Operational Quality Assurance Program.

Manager-Nuclear Power

He is responsible to the Vice President-Power Production for the operations, administration, engineering, maintenance, modification, safety evaluations and licensing of the Kewaunee Nuclear Power Plant. He is also responsible for activities performed by the engineering organization under his supervision, and for ensuring that the directives implement the requirements of the OQAP. He is also responsible for ensuring that the Independent Technical Review Program of the OQAP is implemented, and that a comprehensive training program is developed and implemented.

He has delegated the responsibility for operation, maintenance, modification, and implementation of administrative controls to satisfy the

OQAP to the Kewaunee Plant Manager. He has delegated the responsibility for functions and activities relating to nuclear licensing, support to the plant relating to nuclear steam supply systems, and implementation of Technical Reviews for related areas to the Nuclear Licensing and Systems Superintendent. He has delegated the responsibility for engineering activities, balance of plant technical support, and the Technical Review Program to the Nuclear Services Supervisor. He has delegated the responsibility for modification project administration to the Nuclear Design Change Supervisor. He has delegated the responsibility for training (licensed, non-licensed and professional) to the Nuclear Training Supervisor/Health Physicist. He has delegated the responsibility for administrative and personnel activities, emergency preparedness, budget control, corporate document control, and clerical support to the Nuclear Administrative Supervisor. 4

Kewaunee Plant Manager

He is responsible to the Manager-Nuclear Power for the safe and reliable operation and maintenance of the plant in accordance with the requirements of the OQAP. He has the responsibility for the review, approval, and verification of implementation of plant administrative directives which control activities affecting quality. He has delegated the responsibility for plant operations including general supervision of all shift operating personnel and reactor engineering staff to the Operations Superintendent. He has delegated the responsibility for maintenance of plant equipment to the Maintenance Superintendent. He has delegated the responsibility for technical support to the Plant Services Superintendent. He has delegated the responsibility for verifying the effectiveness of plant quality activities to the Quality Control Supervisor through the Plant Services Superintendent. He has delegated responsibility for security and administrative activities to the Security/Administrative Supervisor. He has delegated specific engineering activities and the responsibility for the Operating Experience Assessment Program to the Plant Technical Superintendent. 4 4

Quality Control Supervisor

He is responsible to the Kewaunee Plant Manager for the review, evaluation, and verification of implementation of the plant administrative directives. He is responsible for the review of plant activities affecting quality and has the onsite Quality Control Group reporting to him. He has the authority and organizational freedom to identify quality problems, initiate, recommend or provide solutions, and verify implementation of corrective actions. He has a direct communications link to the corporate QA staff in matters affecting quality.

Director-Fuel Services | 4

He is responsible to the Senior Vice President-Power Supply and Engineering for procurement, management, and disposition of nuclear fuel and fuel materials, and the implementation of the quality assurance requirements associated with these functions. He has responsibility for reviewing and approving the directives which control the activities affecting quality performed by the Fuel Management Group and ensuring that the directives implement the requirements of the OQAP. | 4

Quality Assurance Supervisor

He is responsible to the Superintendent Power Plant Design and Construction for ensuring the effective implementation of the OQAP. He is responsible for review and approval of directives which control activities affecting quality. He is independent of cost and scheduling considerations and has the authority and organizational freedom to identify quality problems, stop work on non-conforming activities until deficiencies have been corrected, initiate, recommend or provide solutions and verify implementation of corrective actions. He has responsibility for ensuring that functions and activities of the Quality Assurance Staff are controlled and performed in accordance with approved directives which implement the requirements of the OQAP. | 4

The Quality Assurance Supervisor shall as a minimum meet the requirements of ANSI N18.1-1971 and should have a minimum of a B. S.

degree in Science or Engineering from an accredited college or university, a minimum of five years experience in power plant construction, engineering and/or plant operation, and a familiarity with codes and regulations.

Power Plant Design Supervisor

He is responsible to the Superintendent Power Plant Design and Construction for providing engineering and design support to the Manager-Nuclear Power. He is responsible for ensuring that the design activities carried out under his cognizance are performed under the requirements of the OQAP. He reviews and provides inputs to those directives which control engineering activities. | 4

Director-Environmental Services | 4

He is responsible to the Senior Vice President-Power Supply and Engineering for the initiation of environmental surveillance and special study programs to meet the requirements of the regulations. | 4

Nuclear Safety Review and Audit Committee (NSRAC)

NSRAC is responsible to the Vice President-Power Production for review and audit of plant related matters concerning safety. The requirements for personnel, committee composition, meeting frequency, quorum and meeting records shall be in accordance with the requirements of the plant Technical Specifications and the NSRAC Charter. The Committee periodically reviews the results of the Quality Assurance Staff audits. | 4 | 4

Plant Operations Review Committee (PORC)

PORC is responsible to the Kewaunee Plant Manager for providing advice on matters relating to nuclear safety at the plant. The requirements for personnel, committee composition, meeting frequency, quorum and meeting records shall be in accordance with the Technical Specifications and the PORC Charter.

Quality Assurance Typing Committee

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

2.0 QUALITY ASSURANCE PROGRAM

2.1 General

The Operational Quality Assurance Program complies with the requirements of 10CFR50, Appendix B, the provisions of ANSI N18.7-1976 and the Regulatory Guides which endorse the daughter standards required by ANSI N18.7-1976 with the exceptions, interpretations, and qualifications noted in Appendix A of this description. The requirements of the OQAP applies to those activities which affect quality for structures, systems or components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. All structures, systems, and components are classified as QA Type I, II or III according to their function and importance in relation to the safe operation of the reactor, with emphasis on the degree of integrity required to protect the public. The OQAP requirements are mandatory for all QA Type I items. QA Type 1, 2 or 3 items are derived from the Safety Class I, II and III items referenced in the Kewaunee Nuclear Power Plant Updated Safety Analysis Report (USAR) and are established by the QA Typing Committee. The definitions and a list of the Safety Class I, II and III structures, systems and components are found in the Kewaunee FSAR Appendix B, Table B.2-1. 4

2.2 Requirements

It is mandatory for all Wisconsin Public Service Corporation employees to comply with the OQAP. It is the responsibility of the manage-

ment charged with the implementation of the program to inform personnel working for them that the guality policies, OQAP manual, and procedures have mandatory requirements which must be implemented and enforced. The corporate Quality Assurance Staff is responsible for conducting training sessions as necessary to keep individuals informed of policies and changes of the OQAP.

The OQAP shall be applied to all activities affecting safety-related functions and include: design changes, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, modifying, and engineering. The control over these activities shall be applied to an extent consistent with their importance to safety; and shall take into account the need for special controls, processes, tests, equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection, evaluation, or test.

2.3 Structure

The OQAP manual is the top level quality program document for operational phase activities. The manual translates the requirements of 10CFR50 Appendix B, the provisions of ANSI N18.7-1976 and Regulatory Guides 1.8-Rev. 1, 1.30, 1.37, 1.38-Rev. 2, 1.39-Rev. 1, 1.54, 1.58-August, 1973, 1.64-Rev.2, 1.74, 1.88-Rev. 2 and 1.94 into a reference manual for the OQAP. The requirements and responsibilities identified by the manual are implemented through directives, procedures, and instructions which prescribe activities affecting quality.

Quality Assurance Directives are reviewed and approved by the Quality Assurance Supervisor and are prepared to govern Quality Assurance Staff activities such as auditing, QA training, and other related activities. | 4

Engineering Control Directives are reviewed and approved by the Manager - Nuclear Power and are prepared to govern corporate engineering activities such as design changes, procurement, licensing, document control, and other related activities.

Fuel Management Directives are reviewed and approved by the Director - Fuel Services and are prepared to govern fuel management activities affecting quality, such as fuel procurement, reactor core performance and analysis, core design, and other related activities. | 4

Administrative Control Directives are reviewed and approved by the Kewaunee Plant Manager and are prepared to govern plant staff activities affecting quality, such as operation, procedure control, material control, maintenance, and other related activities.

2.4 Management Review

Management above or outside the Quality Assurance organization shall routinely be informed of the status and adequacy of the OQAP. Audits of implementing directives shall be conducted to verify conformance to the program. Nonconformances or differences of opinion which cannot be settled between QA/QC and the department involved shall be brought to the attention of upper management for resolution.

2.5 Indoctrination and Training

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

a. Training personnel responsible for performing quality-affecting activities as to the purpose, scope and implementation of the quality-related manuals, instructions, and procedures.

b. Establishing the scope and depth of indoctrination and training to be provided commensurate with the level of quality affecting activities being performed by an individual.

c. Training personnel who perform quality-affecting activities in the principles and techniques of the activity being performed.

d. Training and retraining on an as-needed basis to maintain a level of quality commensurate with the quality affecting activity being performed.

e. Maintaining of records of training sessions, attendance and content of the training session.

3.0 DESIGN CONTROL

Modifications to systems that are nuclear safety related, or as described in the FSAR, and considered significant for nuclear safety shall be controlled by a Design Change Program established by directives to ensure compliance with the existing design and the requirements of 10CFR50.59. Directives shall be prepared to augment the following aspects of the Design Control Program.

a. Establish the structure, authority and responsibilities of the groups or positions involved in design change activities.
b. Correctly translate design inputs into specifications, drawings, procedures, or instructions.
c. Identify and select the appropriate quality standards in design documents.
d. Select and review the suitability of materials, parts, equipment and processes essential to the safety-related functions of the structure, system, or component.
e. Assure the change is subject to at least the same measures applied to the original design, and provide for a second level review.
f. Assign the responsibilities of all organizations involved in the design process, both internal (WPS) and external (contractor, vendor) and ensure a method of exchanging technical information across internal and external interfaces.

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

4.0 PROCUREMENT DOCUMENT CONTROL

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

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

5.0 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Measures shall be established in appropriate directives to control the preparation, format, content, approval method, and use for operating, test and maintenance procedures. When required, they shall be prepared in sufficient detail to provide adequate guidance in performing activities affecting quality. These procedures shall include, as appropriate, initial conditions, step-by-step instructions, sign-off steps, acceptance criteria, etc., to ensure that activities affecting quality have been satisfactorily completed.

A Design Change Program shall be established by directives to assure that instructions, procedures, and drawings are used, where appropriate, to control activities associated with the modification of safety systems described in the USAR. These directives shall establish a method to update drawings, procedures, and other technical documents associated with the plant modification. 4

6.0 DOCUMENT CONTROL

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

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

7.0 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

Suppliers of material, equipment and services, including suppliers of spare or replacement parts, shall be selected based on an evaluation of the supplier's capability to provide the purchased items or services in accordance with the requirements of the procurement documents. Directives shall include methods for source evaluation and selection. One or more of the following considerations shall be included for source evaluation; evaluation of the supplier's history of providing a product which performs satisfactorily in actual use; review of industry directories; review of whether the prospective supplier has a quality assurance program approved by the NRC under the Vendor Inspection Program; review of whether the prospective supplier is listed in a CASE (Coordinating Agency for Supplier Evaluation) Nuclear Section Register or similar third party inspection publication; review and evaluation of the supplier's Quality Assurance Program, Manual and Procedures, and the supplier's design and manufacturing capability; and a WPS survey of the prospective supplier's technical and quality capability by directly evaluating his facilities, personnel and the implementation of his quality assurance program.

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

8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

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

9.0 CONTROL OF SPECIAL PROCESSES

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

10.0 INSPECTION

Concerning material receipt, directives shall establish a receipt inspection under the control of the Quality Control Supervisor, which provides for visual examination, receipt of required documentation, verification of identification, and on-site technical inspection.

Concerning modifications, the Design Change Program provides for the following requirements: special processes, test, measuring and test equipment, and cleanliness. The work package shall be reviewed by site quality control personnel to ensure that the required special installation procedures are included in the package or properly referenced.

Verification of conformance to established requirements shall be performed by individuals or groups who do not have direct responsibility for performing the work being verified. Personnel or groups assigned responsibility for verification of inspection or testing shall be delineated in appropriate procedures and directives.

Individuals performing inspection, examination, and testing functions associated with normal operations of the plant and certain technical reviews normally assigned to the on-site operations organization shall be qualified to ANSI N18.1-1971. Personnel whose qualifications are not required to meet those specified in ANSI N18.1-1971 and who are performing inspection, examination, and testing during the operational phase of the plant shall be qualified to ANSI N45.2.6-1973 except that the QA experience cited for Levels I, II, and III shall be interpreted to mean actual experience in carrying out the types of inspection, examination, and testing activity being performed.

Training of personnel performing activities affecting quality shall be conducted to ensure that suitable proficiency is achieved and maintained.

11.0 TEST CONTROL

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

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

12.0 CONTROL OF MEASURING AND TEST EQUIPMENT

Measuring and test equipment and reference standards (calibration standards) used for measurements, tests and calibration respectively, shall be of the proper range and type and shall be controlled, calibrated and adjusted, and maintained at specified intervals or prior to use to assure the necessary accuracy of calibrated devices. The referenced standards used shall have an accuracy range and stability which are adequate to verify that the equipment being calibrated is within required tolerance. The reference standards used shall be adequate for the requirements of the equipment being calibrated, shall be recertified against higher level equipment of closer tolerance, and shall be traceable to nationally recognized standards. The method and interval of calibration for measuring and test equipment and reference standards shall be specified and shall be based on the type of equipment, its characteristics and other conditions affecting calibration.

When measuring and testing equipment or reference standards are found to be out of calibration, an evaluation shall be made of previous inspections and test results and acceptability of the items previously inspected.

13.0 HANDLING, STORAGE, AND SHIPPING

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

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

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

14.0 INSPECTION, TEST, AND OPERATING STATUS

The measures required in this criteria are applied to two general categories, material control and operational control. Material control and the work request program are under the control of plant directives which are controlled under the cognizance of the QA Organization. All changes in procedures for these categories are reviewed by management. If the need for bypassing of a required inspection, test, or other critical operation occurs, it shall be procedurally controlled and reviewed by management.

14.1 Material Control

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

14.2 Operational Control

The work request program shall include provisions for taking equipment out of service, identification of that equipment, and precautions or prerequisites for returning that equipment to service. The work request and supplemental documents shall be reviewed by quality control personnel to ensure that special processes, inspection (hold and witness points) and testing requirements are adequately specified. They are also reviewed by operations personnel to determine the effect on plant operations, the proper tagging out of service of equipment, and the protection of personnel and equipment.

15.0 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

When a nonconforming item is identified during a receipt inspection, the condition shall be documented on a Nonconformance Report and the item identified or segregated to preclude misuse, further processing, or installation pending disposition. Nonconformance Reports will be controlled and evaluated by cognizant plant personnel for the determination of the disposition of nonconforming items. Nonconformance reports and dispositions shall be submitted to the responsible organization for implementation of corrective action. Provisions shall be established to ensure that items dispositioned as "repair" or "rework" shall be reinspected and require documentation verifying the acceptability of the item prior to release for use.

16.0 CORRECTIVE ACTION

Conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective materials and equipment, and nonconformances shall be identified by Nonconformance Reports and/or Incident Reports. These reports provide the mechanism for all personnel to notify management of conditions adverse to quality. Measures shall be provided for the prompt processing of these reports to ensure expeditious investigation, evaluation, and implementation of corrective action. For situations determined to be significantly adverse to quality, investigations shall not only provide for identifying and correcting the condition, but also for determining the cause of the condition to ensure that corrective action is taken to preclude its reoccurrence.

17.0 QUALITY ASSURANCE RECORDS

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

Records shall be primarily maintained in the QA Vault, the main records storage facility. Frequently used records, not stored in the QA Vault, will be filed in locked, fire-resistant cabinets with controlled access, or duplicate records will be maintained at remote locations.

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

18.0 AUDITS

Audits shall be conducted in accordance with Quality Assurance Directives to verify that the requirements of the QA program are being implemented. Audits shall be conducted on but not limited to power plant operating and maintenance activities, engineering staff activities, Fuel Management activities, Purchasing Department activities, and Supplier activities. Audits shall be performed by personnel experienced and trained commensurate with the scope of the activity being audited and independent of any direct responsibility of the activity being audited.

The preparing of procedures for audits, documentation of audit findings, and issuance of audit reports shall be described by applicable Quality Assurance Directives. Supervisory personnel of the audited activity shall review the audit report and provide corrective actions. Follow-up action shall be provided for by the OQAP to ensure that corrective action is implemented and adequate.

L1-28.15

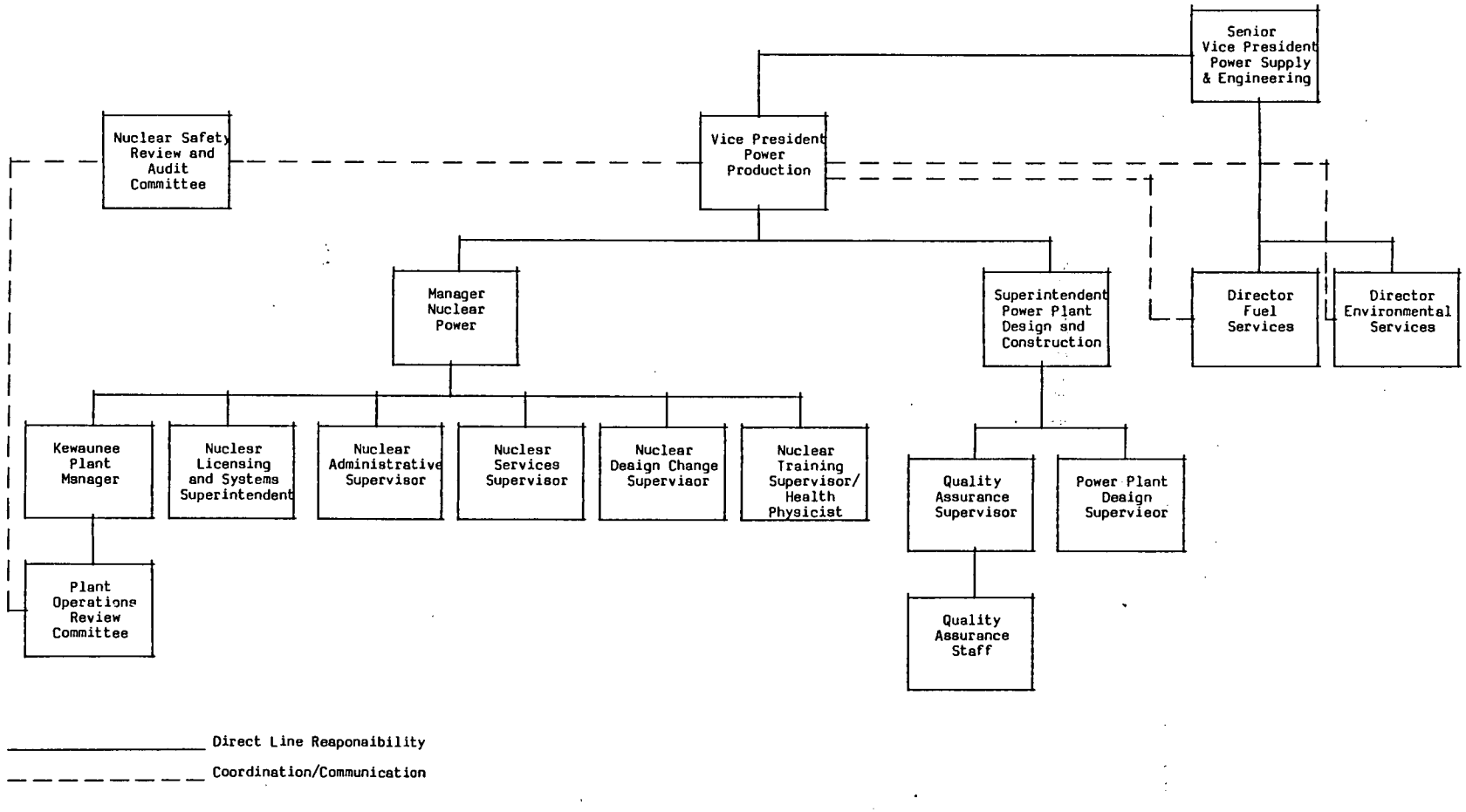

Figure 1

OFFSITE FUNCTIONAL QUALITY ASSURANCE ORGAINIZATION

L1-28.16

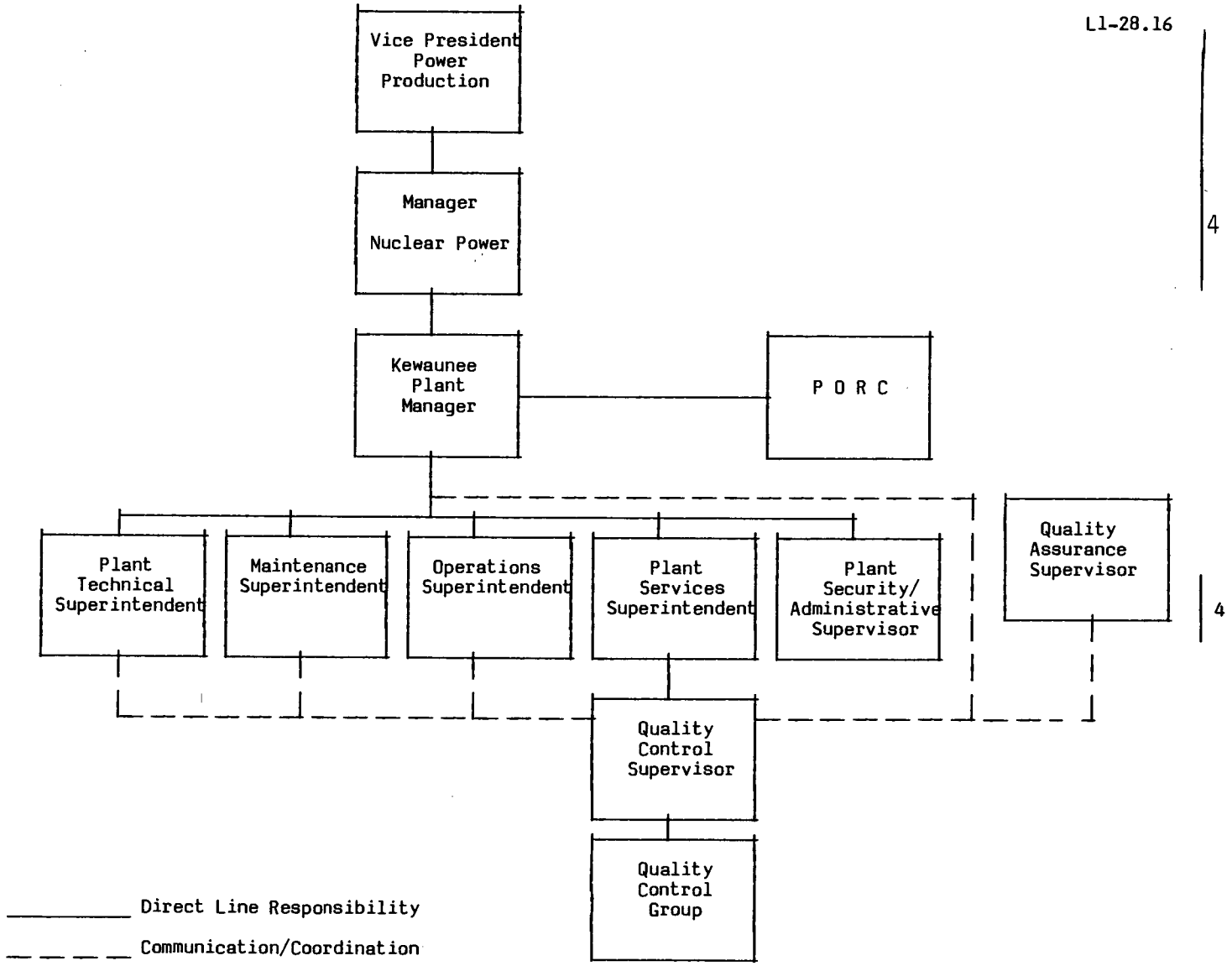

Figure 2

ONSITE FUNCTIONAL QUALITY ASSURANCE ORGANIZATION

APPENDIX A ANSI N18.7-1976 EXCEPTIONS, INTERPRETATIONS, QUALIFICATIONS

GENERAL

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

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

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

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

PARTICULAR EXCEPTIONS AND QUALIFICATIONS

ANSI N18.7-1976
Section

3.1 Administrative controls shall be established necessary to comply with this standard as adopted, with the exceptions, interpretations, and qualifications addressed in this transmittal.

5.2.7.2 This paragraph requires that design activities associated with modification of safety-related structures, systems, and components shall be accomplished in accordance with ANSI N45.2.11-1974. Compliance to apply this standard to those design activities and the provisions of this standard shall be employed as applicable to the degree of importance to safety for the design project under consideration. We shall also adopt the Regulatory Position of Regulatory Guide 1.64, Rev. 2, June 1976, as requested with an exception to position C.2. We will follow our existing practice that design verification should not be performed by the originator's supervisor, except where expertise is not available other than the supervisor immediately responsible for the design.

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

ANSI N45.2.9-1974
Section

4.3 & 4.4 Concerning Receipt Control.

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

5.6 Concerning Permanent and Temporary Storage Facilities.

Criteria specified in this paragraph for those records stored in the QA Vault are met; however, the use of temporary storage facilities, the definition of a working QA document and the transport of QA records to the vault differ. Several in-house generated QA documents/records are maintained in working files, e.g., NSRAC Meeting Minutes, training records and radiological survey data. These documents/records which we feel are working documents until no longer used on a routine basis are kept in locked, fire-proof file

cabinets and are periodically transferred to the QA Vault. Duplication or filing in the vault would be unacceptable due to the quantity and frequent use of these documents. We find our handling of these documents acceptable due to the relative short duration of filing in temporary quarters and relative insensitivity of these documents to the safety of the plant. Finally, we do not have a courier service to immediately transfer a QA record just completed to the vault. Some records are transferred by personnel delivery and others through the routine in-company mail service. At this time we do not plan to implement any further controls on transferring documents to the QA Vault.