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SUBJECT: Forwards Rev 10 to "Operational QA Program Description" & description of revs.

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January 30, 1991

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Revision 10 of the Operational Quality Assurance Program Description

- Reference:
- 1) Letter from K. H. Evers (WPSC) to NRC Document Control Desk dated June 11, 1990
 - 2) Letter from G. C. Wright (NRC) to D. C. Hintz (WPSC) dated August 9, 1990

Due to the large number of organizational changes at Wisconsin Public Service Corporation (WPSC), a revision has been made to WPSC's Operational Quality Assurance Program (OQAP) description. This letter transmits the current OQAP description, Revision 10.

Revision 9 of WPSC's OQAP was submitted on June 11, 1990 (reference 1) and accepted by the Nuclear Regulatory Commission (NRC) on August 9, 1990 (reference 2).

Attachment 1 to this letter describes the changes made to the OQAP Description that do not require prior NRC approval. These revisions have strengthened the program, clarified WPSC's commitments, and incorporated changes in WPSC's organization. Attachment 1 to this letter contains a short explanation of each revision to the OQAP Description along with the bases for concluding that the revisions continue to satisfy the criteria of 10 CFR 50, Appendix B. Attachment 2 to this letter is Revision 10 of the OQAP Description.

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Document Control Desk
January 30, 1991
Page 2

This submittal identifies all changes made in conjunction with Revision 10 of the OQAP Description. WPSC has determined that none of the changes made reduce the commitments previously submitted and accepted by the NRC.

Sincerely,

A handwritten signature in black ink, appearing to read "KHE" followed by a flourish.

K. H. Evers
Manager - Nuclear Power

BJD/jms

Attach.

cc - Mr. Patrick Castleman, US NRC
US NRC, Region III

LIC\OQAP\OQAP10

50-305 KEWAUNEE WPSC

REVISION 10 TO OPERATIONAL QA PROGRAM
DESCRIPTION.

REC'D W/LTR DTD 01/30/91...9102070226

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Attachment 1

To

Letter from K. H. Evers (WPSC) to NRC Document Control Desk

Dated

January 30, 1991

Description of Revisions to the Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 10

The following is a list of changes made in June, 1990 to Wisconsin Public Service Corporation's Operational Quality Assurance Program (OQAP) Description. The changes noted below are indicated by page number with a #1 corresponding to the first shaded section on the page, #2 corresponding to the next shaded section, and so on.

Page 1

#1&2 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

This change reflects the current organizational structure of Wisconsin Public Service Corporation (WPSC).

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

Page 2

#1 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

#2 Description of Change

The title of Power Plant Design Supervisor has been replaced with the new position title of Assistant Superintendent-Plant Project Engineering.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

Due to the reorganization, the responsibilities of the Power Plant Design Supervisor have been assigned to the new position of Assistant Superintendent-Plant Project Engineering. This is an administrative change only and does not reduce previous commitments in the OQAP description.

Page 3

#1 Description of Change

Refer to Page 2, Change #2 (Page 1 of this attachment).

Reason for Change

Refer to Page 2, Change #2 (Page 1 of this attachment).

Safety Evaluation

Refer to Page 2, Change #2 (Page 1 of this attachment).

#2 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

#3 Description of Change

Operator training has been added to the list of responsibilities delegated to the Kewaunee Plant Manager. The words "with the exception of operator training" have been added to the responsibilities delegated to the Superintendent-Nuclear Training/Health.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

Operator training, which previously had been delegated to the Superintendent-Nuclear Training/Health Physicist, is now the responsibility of the Kewaunee Plant Manager. This change in responsibility will result in a more effective utilization of resources. This is an administrative change only and does not reduce previous commitments in the OQAP Description.

Page 4

#1 Description of Change

Refer to Page 3, Change #3 (Page 2 of this attachment).

Reason for Change

Refer to Page 3, Change #3 (Page 2 of this attachment).

Safety Evaluation

Refer to Page 3, Change #3 (Page 2 of this attachment).

#2 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

These changes reflect the current organizational structure of WPSC.

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

#3 Description of Change

The Operational Experience Assessment Program has been added to the responsibilities of the Superintendent-Safety System Engineering.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

Due to the deletion of the position of Superintendent-Plant Technical, the responsibility for the Operational Experience Assessment Program has been reassigned to the Superintendent-Safety Systems Engineering. This is an administrative change only and does not reduce previous commitments in the OQAP description.

#4&5 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

These changes reflect the current organizational structure of WPSC.

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

Page 5

All Description of Change
Changes

The Technical Support Department is no longer a separate group within the WPSC organization. The responsibilities formerly associated with this group have been assigned to the maintenance group, the operations group, and to the newly created plant quality programs group. As a result of this reorganization, the position of Superintendent - Plant Technical is no longer in existence and the references to that position have been deleted.

The new title of Supervisor - Plant Quality Programs has been added with responsibility for plant quality activities.

At the same time, the instrument and control and plant computer groups within the Maintenance Department have been established as an independent department. Therefore, the new position of Superintendent - Plant Instrument and Control has been added reporting to the Plant Manager.

A new department of plant information systems has been formed. Therefore, the position of Superintendent - Plant Information Systems has been added. The title of Plant Personnel Supervisor and his responsibilities have also been added to this description. The responsibilities for each group have been revised to reflect the current organizational structure.

Reason for Change

These changes reflect the current organizational structure of WPSC.

Safety Evaluation

These changes do not reduce the responsibilities of the Kewaunee Plant Manager. All previous responsibilities of the Plant Manager have been retained and due to the reorganization, a few have been reassigned to different or newly formed groups reporting to the Plant Manager. These changes do not represent a decrease in the engineering, technical, or management support for the Kewaunee Nuclear Power Plant or a reduction of previous commitments in the OQAP Description. Therefore, these changes do not have any safety significance.

Page 6

#1 Description of Change

The quality control responsibilities of the former position of Superintendent - Plant Quality Control have been delegated to the new position of Supervisor - Plant Quality Programs.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

Due to the reorganization, the responsibilities of the Superintendent - Plant Quality Control have been assigned to the new position of Supervisor - Plant Quality Programs. This is an administrative change only and does not reduce previous commitments in the OQAP Description.

#2 Description of Change

Inservice Inspection and Quality Control engineering activities, and also steam generator inspection service activities are now the responsibility of the Supervisor-Plant Quality Programs.

Reason for Change

Refer to the discussion of Change #1 on Page 5 of the OQAP (Page 2 of this attachment).

Safety Evaluation

Due to the reorganization, certain responsibilities of the former position of Superintendent-Plant Technical have been assigned to the new position of Supervisor-Plant Quality Programs. These are administrative changes only and do not reduce previous commitments in the OQAP Description.

#3 Description of Change

The responsibility for warehouse and administrative activities have been deleted from the former position of Superintendent - Plant Quality Control.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

The responsibility for warehouse activities and administrative activities have been reassigned to the Superintendent - Plant Information Systems and Plant Personnel Supervisor respectively. Therefore, this is an administrative change only and does not reduce previous commitments in the OQAP Description.

#4 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

Page 7

#1 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

Page 11

#1 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

#2 Description of Change

The title Superintendent - Plant Quality Control has been replaced with the new position title of Supervisor - Plant Quality Programs.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

Due to the reorganization, the responsibilities of the Superintendent - Plant Quality Control have been assigned to the new position of Supervisor Plant Quality Programs. This is an administrative change only and does not reduce previous commitments in the OQAP Description.

Page 17

#1 Description of Change

The title Superintendent - Plant Quality Control has been replaced with the new position title of Supervisor - Plant Quality Programs.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

Due to the reorganization, the responsibilities of the Superintendent - Plant Quality Control have been assigned to the new position of Supervisor - Plant Quality Programs. This is an administrative change only and does not reduce previous commitments in the OQAP Description.

Page 22

#1 Description of Change

The title of Assistant Vice President-Nuclear Power has been replaced by Vice President-Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is a title change only. The Vice President-Nuclear Power is responsible directly to the Chairman and Chief Executive Officer. Therefore, this change is administrative in nature and does not change the responsibilities described in the OQAP Description.

Pages 25 & 26

#1 Description of Change

The title changes and reorganization described in section 1.2 of the OQAP are depicted on figure 1 and 2.

Reason for Change

These changes reflect the current organizational structure of WPSC.

Safety Evaluation

The changes to these figures are administrative in nature and do not involve a safety concern. The safety evaluation for the individual changes are listed under each revision to section 1.2.

Page 29

#1 Description of Change

The words Plant QC staff have been replaced with Plant Information Systems Group.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

Due to the reorganization, the responsibilities for receiving and storing records has been assigned to the newly formed Plant Information Systems Group. This change is administrative in nature and does not reduce previous commitments in the OQAP Description.

LIC\OQAP\OQAP10

Attachment 2

To

Letter from K. H. Evers (WPSC) to NRC Document Control Desk

Dated

January 30, 1991

Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 10