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Mr. A. Schwencer

FROM:
Wisconsin Public Serv. Corp.
Green Bay, Wisconsin
E. W. James

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PLANT NAME: Kewaunee
RJL 6/20/77

ENCLOSURE

OPERATIONAL QUALITY ASSURANCE PROGRAM
DESCRIPTION -

(25 cys rec'd)

SAFETY

FOR ACTION/INFORMATION

ENVIRONMENTAL

ASSIGNED AD:
BRANCH CHIEF: **Schwencer (5)**
PROJECT MANAGER: **Neighbors**
LICENSING ASSISTANT: **Sheppard**

ASSIGNED AD: V. MOORE (LTR)
BRANCH CHIEF:
PROJECT MANAGER:
LICENSING ASSISTANT:

B. HARLESS

INTERNAL DISTRIBUTION

REG FILES	SYSTEMS SAFETY	PLANT SYSTEMS	SITE SAFETY & ENVIRON ANALYSIS
NRC PDR	HEINEMAN	TEDESCO	DENTON & MULLER
T & E (2)	SCHROEDER	BENAROYA	CRUTCHFIELD
OELD		LAINAS	
GOSSICK & STAFF	ENGINEERING	IPPOLITO	
HANAUER	KNIGHT	F. ROSA	ENVIRO TECH.
MTPC	BOSNAK		ERNST
CASE	SIHWELL	OPERATING REACTORS	BALLARD
BOYD	PAWLICKI	STELLO	YOUNGBLOOD
		EISENHUT	
PROJECT MANAGEMENT	REACTOR SAFETY	SHAO	SITE TECH.
SKOVHOLT	ROSS	BAER	GAMMILL (2)
P. COLLINS	NOVAK	BUTLER	
HOUSTON	ROSZTOCZY	GRIMES	
MELTZ	CHECK		SITE ANALYSIS
HELTEMES			VOLLMER
SK	AT&I		BUNCH
	SALTZMAN		J. COLLINS
	RUTBERG		KREGER

EXTERNAL DISTRIBUTION

CONTROL NUMBER

LPR: **Kewaunee, WI**
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CYS ACRS SENT CATEGORY: **B**

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WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

June 17, 1977

REGULATORY DOCKET FILE COPY

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Mr. A. Schwencer, Chief
Operating Reactor Branch #1
Division of Operating Reactors



Gentlemen:

REF: Docket 50-305
Operating License DPR-43
Operational Quality Assurance Program
Description

Enclosed are twenty-five (25) copies of the Wisconsin Public Service Operational Quality Assurance Program Description. As per discussions with the staff, the referenced description contains an expansion of the amended FSAR description transmitted by our letter to Mr. A. Schwencer on January 18, 1977.

Very truly yours,

E. W. James
E. W. James
Senior Vice President
Power Supply & Engineering

EWJ:sna
Enc.

OPERATIONAL QUALITY ASSURANCE
PROGRAM DESCRIPTION

KEWAUNEE NUCLEAR POWER PLANT
WISCONSIN PUBLIC SERVICE CORPORATION

INTRODUCTION

The policy of Wisconsin Public Service Corporation is to comply with the requirements of the Operational Quality Assurance Program (OQAP) which has been authorized and prepared under the direction of the Senior Vice President-Power Supply and Engineering. 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.

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 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 Senior Vice President-Power Supply and Engineering and identify all levels of management involved in the OQAP. (See Figure 1) The quality assurance functions performed by each organizational element are cited in the descriptions below.

The Quality Assurance Staff is responsible for preparing, revising, verifying implementation, and evaluating the overall effectiveness of the quality assurance program. They are independent of cost and scheduling considerations, and have the authority and organizational freedom to: identify quality problems; initiate, recommend or provide solutions; and verify implementation of corrective action. They report regularly on the effectiveness of the program to the Vice President-System Planning and Engineering and to the Nuclear Safety Review and Audit Committee.

1.2 Corporate Engineering Organization

Senior Vice President-Power Supply and Engineering

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

Vice President-System Planning and Engineering

He is responsible 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 the OQAP to the Quality Assurance Supervisor. He approves the Quality Assurance directives which control the activities verifying the effectiveness of the OQAP. He has delegated his authority and responsibility for providing engineering support of plant modifications to the Power Plant Design Engineer through the Power Plant Design and Construction Supervisor. He is responsible for final review and approval of changes to OQAP policies and manual.

Superintendent-Steam Plants

He is responsible for administration, operation, maintenance and modification of all WPS power plants. He has responsibility for implementation of the OQAP for engineering, operations, and maintenance-related activities. He has responsibility for approval of directives, which control activities affecting quality performed by the Fuel Management Group and for ensuring that the directives implement the requirements of the OQAP.

His authority and responsibility for the operation, administration, engineering, maintenance, modification and the implementation of the quality assurance requirements associated with these functions and activities, are specifically delegated to the Superintendent-Nuclear Power. His authority and responsibility for the procurement, management, modification and disposition of nuclear fuel and fuel materials, and the implementation of the quality assurance requirements associated with these functions and activities, are specifically delegated to the Nuclear Fuel Supervisor.

1.3 Corporate Nuclear Engineering Staff

Superintendent-Nuclear Power

He is responsible to the Superintendent-Steam Plants for the implementation of the applicable requirements of the Operational Quality Assurance Program relating to operations, administration, engineering, and maintenance. The Senior Vice President-Power Supply and Engineering has delegated responsibility for licensing matters and Quality Assurance as it pertains to licensing matters directly to the Superintendent-Nuclear Power. He has responsibility for approval of directives, which control activities affecting quality performed by the engineering organization under his supervision and for ensuring that the directives implement the requirements of the OQAP.

He has delegated the responsibility for functions and activities relating to nuclear licensing and providing support to

the plant relating to nuclear steam supply systems, to the Nuclear Licensing and Systems Supervisor. He has delegated responsibility for engineering activities, secondary plant technical support and modification project administration to the Nuclear Services Supervisor. He has delegated responsibility for operation, maintenance, modification and implementation of administrative controls to satisfy the OQAP to the Kewaunee Plant Superintendent. He has delegated the responsibility for document control activities to the Nuclear Clerical Coordinator.

1.4 Nuclear Fuel Management Group

Nuclear Fuel Supervisor

He is responsible to the Superintendent-Steam Plants for procurement, management, modification, and disposition of nuclear fuel and special nuclear material. He is responsible for ensuring that the functions and activities of the Nuclear Fuel Management Group with respect to quality are controlled and performed in accordance with approved directives which implement the requirements of the OQAP.

1.5 Plant Operating Staff

Kewaunee Plant Superintendent

He is responsible to the Superintendent-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 verifying the effectiveness of plant quality activities to the Plant Performance Engineer through the Technical Supervisor.

Plant Performance Engineer

He is responsible for the review, evaluation, and verification of implementation of the plant administrative directives. He is responsible for the surveillance 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 which may affect quality.

1.6 Quality Assurance Staff

Quality Assurance Supervisor

He is responsible to the Vice President-System Planning and Engineering for preparing and maintaining the OQAP and for ensuring its effective implementation. He 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.

1.7 Other Key Personnel and Groups

The Power Plant Design Engineer is responsible to the Vice President-System Planning & Engineering through the Power Plant Design and Construction Supervisor for providing engineering and design support to the Superintendent-Nuclear Power. He has responsibility for providing input to these directives which control engineering activities and he reviews those directives used by his group.

The Environmental Engineer 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 Environmental Technical Specifications. (Appendix B of the Plant Technical Specifications)

The Nuclear Safety Review and Audit Committee (NSRAC) is responsible to the Senior Vice President-Power Supply and Engineering for review and audit of conditions and matters that involve safety consideration relating to the plant. 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 Quality Assurance Staff audit reports.

The Plant Operations Review Committee (PORC) is responsible to the Plant Superintendent 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.

The Quality Assurance Typing Committee is responsible 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 and with the provisions of 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 I, II and III items are derived from the Safety Class I, II and III items referenced in the Kewaunee Nuclear Power Plant Final Safety Analysis Report (FSAR) and one 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.

2.2 Requirements

It is mandatory for all Wisconsin Public Service Corporation employees to comply with the OQAP. It is the responsibility of the management charged with the implementation of the program to inform personnel working for them that the quality 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 and the provisions of ANSI N18.7-1976 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 Vice President-System Planning and Engineering and are prepared to govern Quality Assurance Staff activities such as auditing, QA training, and other related activities.

Engineering Control Directives are reviewed and approved by the Superintendent-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 Superintendent-Steam Plants and are prepared to govern fuel management activities affecting quality, such as fuel procurement, core performance analysis, core design, and other related activities.

Administrative Control Directives are reviewed and approved by the Plant Superintendent 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

Directives shall be prepared to provide a training program and schedule which develops and maintains a staff qualified to operate, maintain, and provide the necessary technical and engineering support. Training and retraining will be provided on an as needed basis commensurate with the level of quality affecting activities being performed by an individual. Records of training programs and attendance will be kept as a method of documenting individuals' progress and qualifications.

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. These procedures 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 FSAR. These directives shall establish a method to update drawings, procedures, and other technical documents associated with the plant modification.

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 Plant Performance Engineer 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.

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

Directives shall be established to control the identification and calibration of measuring and test equipment. The method and interval of calibration shall be specified in plant procedures. Directives shall establish requirements for the preparation and review of records of calibrations to ensure that equipment is maintained within prescribed tolerances.

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 ensure cognizance of QA Program. All changes in procedures for these categories are 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.

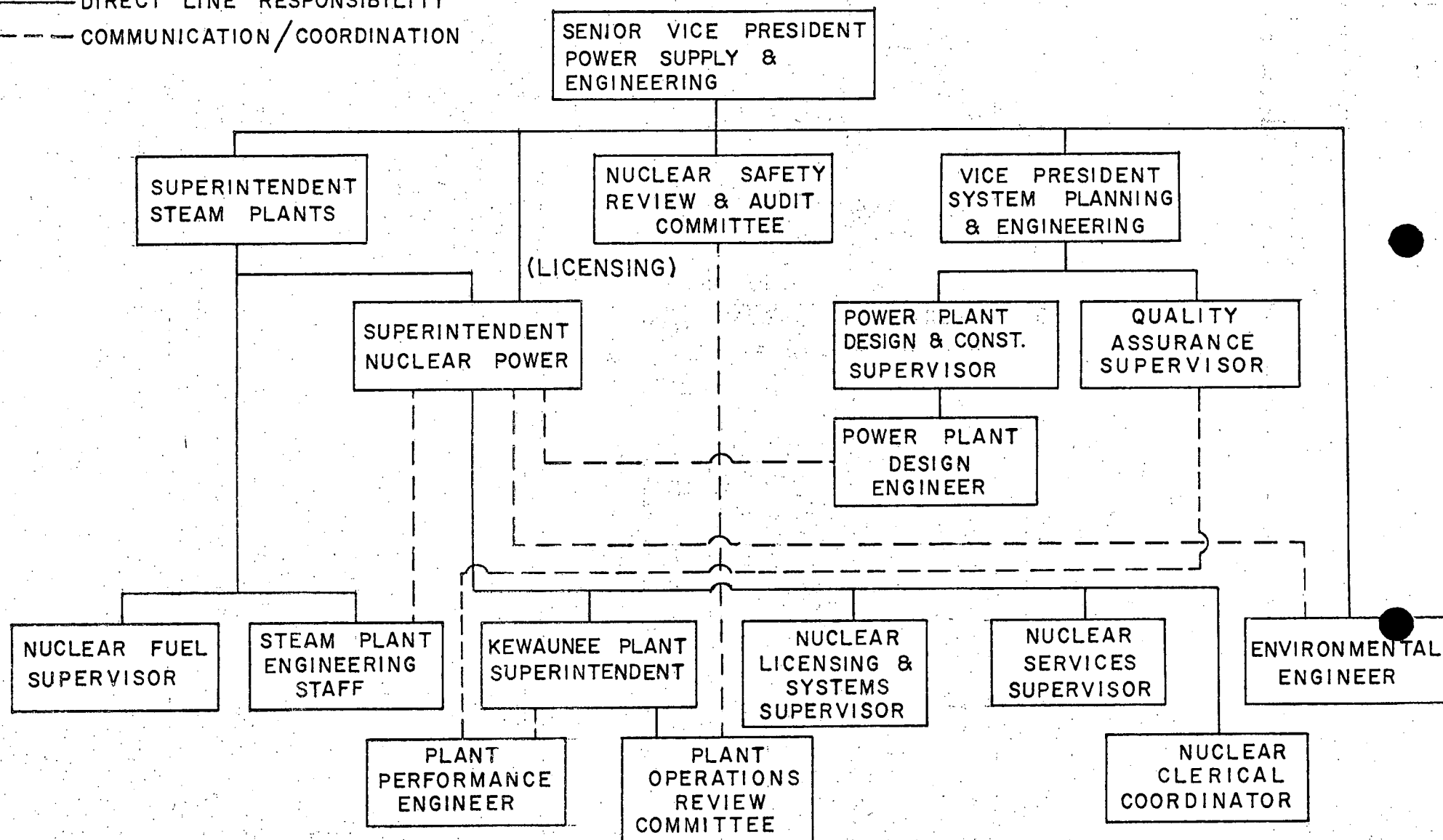
Records shall be kept for the prescribed periods of time in accordance with the requirements of Technical Specifications or Regulations. Directives shall provide for a system that permits the retrieval of information in a reasonable amount of time.

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 action. Follow-up action shall be provided for by the OQAP to ensure that corrective action is implemented and adequate.

———— DIRECT LINE RESPONSIBILITY
 - - - - COMMUNICATION / COORDINATION



FUNCTIONAL ORGANIZATION
 POWER SUPPLY & ENGINEERING DEPARTMENT

FIGURE 1

GENERAL

It is our company position that ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants", provides an acceptable basis for establishing a QA program that meets the requirements of 10CFR50 Appendix B and satisfies our philosophy for the safe operation of a nuclear power plant. We also feel that although the standard may provide an acceptable means to satisfy the criteria of 10CFR50 Appendix B, this does not mean that it provides the only acceptable means to ensure the safe operation of the plant. In this regard, we have attempted to list below those portions of this standard to which we list exceptions, interpretations and/or qualifications.

Certain of the provisions of this standard are vague or ambiguous and require interpretation. We have in general adopted the philosophy that when an interpretation is necessary, we will follow our current existing practice; or if a current practice is not applicable, a conscientious interpretation will be formalized with the concurrence of both the implementing organization and the QA staff. When agreement between these two groups is not reached, it will be brought before corporate management for resolution.

Also, we would like to qualify certain statements in the standard. In the case of most of the daughters standards adopted by ANSI N18.7-1976 which apply to construction activities, it is our philosophy that we will commit to apply these standards only to those activities that we deem are comparable in nature and extent to similar construction-related activities, and to the extent necessary to carry out the activity without undue risk to the health and safety of the public. 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 We shall establish administrative controls necessary to comply with this standard as adopted, with the exceptions, interpretations, and qualifications addressed in this transmittal.
- 5.2.7 ANSI Standards N45.2.4-1972, N45.2.5-1974, N45.2.6-1973, N45.2.8-1975, N45.2.11-1974, and N101.4.2-1972 shall be applied to those activities that we deem are comparable in nature and extent to similar construction-related activities, and to the extent necessary to carry out the activity without undue risk to the health and safety of the public.
- 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. It is our opinion that this standard is primarily aimed at large scale design projects such as would be undertaken by the Architect Engineer or Nuclear Steam Supplier. In that light, not all of the provisions of this standard are relevant for small scale design projects. We will commit to using this standard as a guide in modification design activities and the extent to which the provisions of this standard are applied will be determined on an individual modification design basis. We believe that this commitment is in conformance with the intent given in the responsibility section (section 1.3 of ANSI N45.2.11-1974) of the Introduction to this standard which states; "It is the responsibility of the plant owner and other organizations invoking this standard to identify the structures, systems and components, and to specify the extent to which the provisions of this standard apply to such structures, systems, and components."
- 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. Our existing records management program incorporates the format of this standard and we feel meets the intent of the standard, however, we do not comply with all of the provisions of the standard. Our existing records management program is in compliance with ANSI N18.7-1976.