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SUBJECT: Forwards Rev 6 to "Operational QA Program Description."
 Short explanation of each change encl. Rev satisfies
 10CFR50, App B criteria.

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WISCONSIN PUBLIC SERVICE CORPORATION

600 North Adams • P.O. Box 19002 • Green Bay, WI 54307-9002

June 11, 1987

10 CFR 50.54(a)(2)

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 6 of the Operational Quality Assurance Program Description

- References:
- 1) Letter from D. C. Hintz (WPSC) to J. G. Keppler (NRC) dated September 20, 1985
 - 2) Letter from C. J. Paperiello (NRC) to D. C. Hintz (WPSC) dated September 30, 1985
 - 3) Letter from M. B. Fairtile (NRC) to D. C. Hintz (WPSC) dated February 3, 1987

In accordance with the requirements of 10 CFR 50.54(a)(2), this letter submits the current description (Revision 6) of Wisconsin Public Service Corporation's (WPSC) Operational Quality Assurance Program. Revision 5a of this document was submitted on September 20, 1985 (reference 1) and accepted by the Nuclear Regulatory Commission (NRC) on September 30, 1985 (reference 2).

The revisions made to the Operational Quality Assurance Program (OQAP) have strengthened the program, clarified WPSC's commitments, and incorporated changes in WPSC's organization. In addition, the OQAP Description contains information that replaces requirements previously maintained in Section 6.5.2.4 of the Kewaunee Nuclear Power Plant's Technical Specifications. Section 6.5.2.4 had been deleted by Technical Specification amendment number 72 which was approved by the NRC in reference 3.

Attachment 1 to this letter contains a short explanation of each revision to the OQAP Description along with the basis for concluding that the revisions continue to satisfy the criteria of 10 CFR 50, Appendix B. Attachment 2 to this letter is Revision 6 of the OQAP Description.

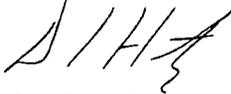
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June 11, 1987
Page 2

This submittal identifies all changes made in conjunction with Revision 6 of the OQAP Description. None of the changes made reduce the commitments previously submitted and accepted by the NRC.

Sincerely,



D. C. Hintz
Vice President - Nuclear Power

KAH/jms

Attach.

cc - Mr. Robert Nelson, US NRC
US NRC, Region III

Attachment 1

To

Letter from D. C. Hintz (WPSC) to NRC Document Control Desk

Dated

June 11, 1987

Description of Revisions to the Kewaunee Nuclear Power Plant
Operational Quality Assurance Program Description

Revision 6

The following is a list of changes made in June, 1987 to the Operational Quality Assurance Program (OQAP) Description. The changes noted below are indicated by page with #1 corresponding to the first change bar on the top of a page and #2 to the next change bar and so on.

Page 2

#1 Description of Change

The position of Vice President - Power Production has been deleted and his responsibilities have been transferred without change to the Senior Vice President - Power Supply and Engineering.

Reason for Change

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

Safety Evaluation

This change ensures approval of the OQAP is maintained at the highest level of responsibility for implementation of the OQAP. This ensures that OQAP changes are consistent with regulatory requirements and with the needs of all affected departments.

#2 Description of Change

The position of Vice President - Fossil Operations has been added.

Reason for Change

This change maintains consistency between the QQAP and the QQAP Description and also reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and does not change the responsibilities described in the QQAP Description.

#3 Description of Change

The Superintendent - Power Plant Design and Construction is responsible to the Vice President - Fossil Operations. In addition, the words "and management objectives" were added.

Reason for Change

This change reflects the current organizational structure of the WPSC. In addition, the new wording indicates that the QQAP must not only meet licensing requirements but also any management objectives that are set above and beyond the regulatory requirements.

Safety Evaluation

The title change is administrative in nature. The wording change strengthens the program by requiring the QQAP to meet both licensing requirements and management objectives. This does not reduce any commitments made in the QQAP Description.

Page 3

#1 Description of Change

The title Manager - Nuclear Power has been revised to Vice President - Nuclear Power. He is responsible to the Senior Vice President - Power Supply and Engineering. In addition the words "technical reviews (including an independent technical review of the OQAP), training, testing" have been added to his responsibilities. With the addition of this wording, a redundant sentence concerning a technical review of the OQAP and training has been deleted.

Reason for Change

The title changes reflect the current organizational structure of WPSC. The wording change provides a list of the Vice President - Nuclear Power's responsibilities in a simple, straight-forward manner without redundant wording.

Safety Evaluation

The title changes are administrative in nature. The wording change does not reduce the responsibilities of the Vice President - Nuclear Power. He is still responsible for the technical review of the OQAP. However, the wording now clarifies the fact that he is also responsible for other technical reviews of the Kewaunee Nuclear Power Plant (KNPP). The wording change concerning training simplifies the description of the responsibilities of the Vice President - Nuclear Power but does not reduce his

responsibilities concerning training. A comprehensive training program still must be developed and implemented.

#2 Description of Change

The position of Superintendent - Technical Review and Projects has been added and the responsibilities for technical reviews has been transferred from the Superintendent - Nuclear Services.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change does not decrease the level of any commitment made in the OQAP Description and therefore does not involve a safety concern.

#3 Description of Change

The position of Assistant Manager - Nuclear Engineering has been added and his responsibilities have been listed.

Reason for Change

This change reflects the current organizational structure of WPSC. The responsibilities of the Nuclear Licensing and Systems, Nuclear Services, and Nuclear Design Change Groups have been consolidated under his direction.

Safety Evaluation

This change does not decrease the level of any commitment. This change simply clarifies the current organization and the subsequent responsibilities.

Page 4

#1 Description of Change

The Nuclear Licensing and Systems Superintendent is now responsible to the Assistant Manager - Nuclear Engineering.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and does not change the commitments made in the OQAP Description.

#2 Description of Change

The Superintendent - Nuclear Services is now responsible to the Assistant Manager - Nuclear Engineering. The Superintendent - Nuclear Design Change is now responsible to the Superintendent - Nuclear Services. The responsibility for the technical review program has been transferred to the Superintendent - Technical Review and Projects.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and does not change the commitments made in the OQAP Description. The change in responsibilities for the technical review program has not reduced the level of commitment to this program.

#3 Description of Change

The title Manager - Nuclear Power has been revised to Vice President - Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and therefore does not involve a safety concern.

#4 Description of Change

The position of Assistant Manager - Plant Services has been added and his responsibilities have been defined. In addition, the responsibilities for the implementation of the Radiological Environmental Monitoring Program have been transferred from the Director - Environmental Services to the Assistant Manager - Plant Services.

Reason for Change

This change reflects the current organizational structure of the WPSC. The duties of the old position Assistant Manager - Plant Technical and Services have been split between the two new positions of Assistant Manager - Plant Services and Superintendent - Plant Technical. In addition, the radiological environmental duties of the Director - Environmental Services have been transferred to the Assistant Manager - Plant Services under the Radiological Environmental Monitoring Program.

Safety Evaluation

The assignment of responsibilities to the new position of Assistant Manager - Plant Services does not reduce the level of any commitment in the OQAP Description. The transfer of the radiological environmental duties to a plant group simplifies coordination between the affected groups. This transfer of duties is administrative in nature and does not involve a safety concern or affect any commitments in the OQAP Description.

Page 5

#1 Description of Change

The responsibilities for plant technical support have been assigned to the new position of Superintendent - Plant Technical. Also, the wording "and for controlling warehouse activities" has been added to the responsibilities for the Superintendent - Plant Quality Control.

Reason for Change

The title change reflects the current organizational structure of WPSC. The duties of the old position Assistant Manager - Plant Technical and Services have been split between the two new positions of Assistant Manager - Plant Services and Superintendent - Plant Technical. The wording change ensures that the responsibility for warehouse activities is included in the OQAP Description.

Safety Evaluation

The assignment of responsibilities to the new position of Superintendent - Plant Technical does not reduce the level of any commitment in the OQAP Description. The wording change clarifies the responsibilities of the Superintendent - Plant Quality Control and ensures the responsibility for warehouse activities is included in the OQAP Description. This does not reduce the level of any commitment in the OQAP Description and is not a safety concern.

#2 Description of Change

The wording "In addition, he is responsible for warehouse activities." has been added to the responsibilities of the Superintendent - Plant Quality Control.

Reason for Change

This change ensures that the responsibility for warehouse activities is included in the OQAP Description.

Safety Evaluation

This change clarifies the responsibilities of the Superintendent - Plant Quality Control and ensures the responsibility for warehouse activities is included in the OQAP Description. This does not reduce the level of any commitment in the OQAP Description and is not a safety concern.

#3 Description of Change

The term Fuel Management Group has been replaced by the terms Nuclear Fuel Cycle Group and the Nuclear Fuel Analysis Group.

Reason for Change

This change maintains consistency between the OQAP and the OQAP Description and also reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and does not involve a safety concern.

Page 6

#1 Description of Change

The words "and ensuring support is available for special projects involving the nuclear power plant" have been added to the responsibilities of the Director - Fuel Services.

Reason for Change

This wording was added to incorporate information previously maintained in the Kewaunee Nuclear Power Plant's (KNPP) Technical Specifications.

Safety Evaluation

This change was approved by the Nuclear Regulatory Commission's Safety Evaluation of KNPP Technical Specification amendment number 72. This Safety Evaluation was transmitted to WPSC by a letter from M. B. Fairtile (NRC) to D. C. Hintz (WPSC) dated February 3, 1987. Therefore, the NRC has already approved the addition of this wording to the OQAP Description.

#2 Description of Change

The title of Vice President - Power Production has been replaced by Senior Vice President-Power Supply and Engineering.

Reason for Change

The position of Vice President - Power Production no longer exists at WPSC. Therefore, nonconforming activities are now reported to the Senior Vice President-Power Supply and Engineering.

Safety Evaluation

The stop work authority of the QA Supervisor is now maintained through reporting nonconforming activities to the Senior Vice President-Power Supply and Engineering. This change ensures that an individual with the appropriate responsibility and authority is the contact for the QA Supervisor concerning stop work situations. This change reflects the current organizational structure of WPSC and ensures the stop work authority of the QA Supervisor is properly defined and maintained.

Page 7

#1 Description of Change

The title of Manager - Nuclear Power has been replaced by Assistant Manager - Nuclear Engineering.

Reason for Change

The responsibility for engineering services and nuclear design changes has been delegated to the Assistant Manager - Nuclear Engineering. Therefore, the engineering and design support supplied by the Power Plant Design Supervisor is provided to the Assistant Manager - Nuclear Engineering.

Safety Evaluation

This change does not reduce the responsibilities of the Power Plant Design Supervisor or reduce any previous commitments made in the OQAP Description. This change reflects the current organizational structure of WPSC and is not a safety concern.

#2 Description of Change

The Nuclear Safety Review and Audit Committee (NSRAC) is now responsible to the Senior Vice President - Power Supply and Engineering rather than the Vice President - Power Production.

Reason for Change

The position of Vice President - Power Production no longer exists at WPSC. Therefore, the NSRAC is now responsible to the Senior Vice President - Power Supply and Engineering.

Safety Evaluation

This change does not affect the level of any commitment made in the OQAP Description. This change ensures that NSRAC is responsible to high level management at WPSC. This change does not involve a safety concern.

General

Description of Change

Previously, page 7 discussed the responsibilities of the Director - Environmental Services. This section has been deleted.

Reason for Change

The responsibilities of the Director - Environmental Services have been transferred to the Assistant Manager - Plant Services under the Radiological Environmental Monitoring Program.

Safety Evaluation

This change does not reduce responsibilities or commitments made in the OQAP Description in this area. This change only involves a transfer of responsibilities. Therefore, this change does not involve a safety concern.

Page 8

#1 Description of Change

The title Manager - Nuclear Power has been revised to Vice President - Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and therefore does not involve a safety concern.

#2 Description of Change

A new paragraph describing the responsibilities of other key groups was added.

Reason for Change

These groups may perform work that affects the KNPP. Therefore, these groups must implement the OQAP when their work involves the KNPP. The OQAP Description has been updated in order to make this requirement clear.

Safety Evaluation

This change provides clarification of section 1.2 of the OQAP Description by specifically imposing the requirements of the OQAP on groups that may perform work at the KNPP. This does not lessen any previous commitments made in the OQAP Description. In fact, this is a strengthening of the program. This change does not involve a safety concern.

#3 Description of Change

Grammatical corrections were made to the sentence.

Reason for Change

This change improves the OQAP Description.

Safety Evaluation

This change is administrative in nature and does not involve a safety concern.

Page 9

#1 Description of Change

The Roman numerals I, II and III have been replaced by the numbers 1, 2 and 3 and the QA Type NA has been added.

Reason for Change

The revision of the Roman numerals is necessary to maintain consistency with the current terminology used for QA types. The QA type NA has been added to cover those items not a part of established plant systems, structures, or components, i.e., lawnmower parts, administrative supplies, etc.

Safety Evaluation

The revision of the Roman numerals is an administrative change. The addition of the QA type NA does not affect the definitions of QA types 1, 2 and 3. It is simply a new QA type which applies to items that are not part of the established plant systems, structures, or components. This change does not limit any commitments made in the OQAP Description concerning QA types 1, 2 and 3. Therefore, this change does not involve a safety concern.

#2 Description of Change

The Roman numeral I has been replaced by the number 1.

Reason for Change

This change is necessary to maintain consistency with the current terminology used for QA types.

Safety Evaluation

This change is administrative in nature and does not involve a safety concern.

#3 Description of Change

A new paragraph describing QA typing replaced the wording "and are established by the QA Typing Committee."

Reason for Change

This change clarifies the QA typing process and the responsibilities of the QA Typing Committee.

Safety Evaluation

The establishment of QA types for new equipment is the responsibility of the Responsible Engineer installing the equipment under the design change program. The Responsible Engineer is required to follow the OQAP requirements and definitions concerning QA types. In addition, for safety-related design changes, concurrence of the QA typing performed by the Responsible Engineer is included as part of the second level design review performed prior to the design change installation. Any changes to established QA types must be approved by the QA Typing Committee.

As discussed above this QA typing process is implemented within the requirements of the OQAP. In addition, the QA typing process was described in a WPSC letter dated September 21, 1984 from D. C. Hintz (WPSC) to D. G. Eisenhut (NRC). This letter responded to Salem ATWS Item 2.2.1 of NRC Generic Letter 83-28. The NRC accepted this program in a NRC letter dated April 7, 1987 from M. B. Fairtile (NRC) to D. C. Hintz (WPSC). In this letter, the NRC concluded, "the licensee has an adequate program to classify and document safety-related components."

Therefore, this QA typing process has previously been found acceptable by the NRC. Also, the requirements and definitions of the OQAP ensure consistent and accurate QA typing. Thus, the change is acceptable and does not create a safety concern.

Page 10

#1 Description of Change

The words "and training" have been added to the activities under the OQAP.

Reason for Change

This change clarifies the activities covered by the OQAP and maintains consistency between the OQAP and the OQAP Description.

Safety Evaluation

This change strengthens the program and represents an increased commitment. Therefore, this change introduces no safety concern.

Page 11

#1 Description of Change

The title Manager - Nuclear Power has been revised to Vice President - Nuclear Power.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and therefore does not involve a safety concern.

Page 19

#1 Description of Change

The term "Maintenance Work Request" has been revised to "Work Request".

Reason for Change

This change ensures consistency between the OQAP, existing plant directives, and the OQAP Description.

Safety Evaluation

This change is administrative in nature and does not reduce the level of any commitments made in the OQAP Description.

Page 23

#1 Description of Change

The title Vice President - Power Production has been replaced with Senior Vice President - Power Supply and Engineering.

Reason for Change

The position of Vice President - Power Production no longer exists at WPSC. Therefore, the final authority for resolving disagreements regarding corrective action is now the Senior Vice President - Power Supply and Engineering.

Safety Evaluation

This change does not affect the level of any commitment made in the OQAP Description. This change ensures that high level management is involved in the resolution of disagreements regarding corrective action. Therefore, this change is not a safety concern.

#2 Description of Change

The title Vice President - Power Production has been replaced with Vice President - Nuclear Power. The title Manager - Nuclear Power has been replaced with Kewaunee Plant Manager.

Reason for Change

The position of Vice President - Power Production no longer exists at WPSC and the title Manager - Nuclear Power has been revised to Vice President - Nuclear Power. The duties of the Kewaunee Plant Manager have been changed to include these duties. Therefore, these changes clarify the responsibilities of individuals under the current organizational structure at WPSC.

Safety Evaluation

This change does not affect the level of any commitment made in the OQAP Description. The change indicates continued high level management involvement in Quality Assurance and technical reviews. This change involves no safety concern.

Page 26

#1 Description of Change

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

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and does not involve a safety concern.

Page 27

#1 Description of Change

The title changes and reorganization described in Section 1.2 of the OQAP are depicted on this figure.

Reason for Change

This change reflects the current organizational structure of WPSC.

Safety Evaluation

This change is administrative in nature and does not involve a safety concern.

Attachment 2

To

Letter from D. C. Hintz (WPSC) to NRC Document Control Desk

Dated

June 11, 1987

Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 6