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 HINTZ,D.C. Wisconsin Public Service Corp.
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SUBJECT: Forwards Rev 7 to "Operational QA Program Description."

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WISCONSIN PUBLIC SERVICE CORPORATION

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

June 10, 1988

10 CFR 50.54(a)(3)

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 7 of the Operational Quality Assurance Program Description

- References: 1) Letter from D. C. Hintz (WPSC) to NRC Document Control Desk dated June 11, 1987
- 2) Letter from H. J. Miller (NRC) to D. C. Hintz (WPSC) dated August 5, 1987

In accordance with the requirements of 10 CFR 50.54(a)(3), this letter submits the current description (Revision 7) of Wisconsin Public Service Corporation's (WPSC) Operational Quality Assurance Program. Revision 6 of this document was submitted on June 11, 1987 (reference 1) and accepted by the Nuclear Regulatory Commission (NRC) on August 5, 1987 (reference 2).

The revisions made to the Operational Quality Assurance Program (OQAP) Description 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 7 of the OQAP Description.

This submittal identifies all changes made in conjunction with Revision 7 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 dark ink, appearing to read "D. C. Hintz".

D. C. Hintz
Vice President - Nuclear Power

8806160103 880610
PDR ADOCK 05000305
P. ncn

KAH/jms
Attach.

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

Q004
11

Attachment 1

To

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

Dated

June 10, 1988

Description of Revisions to the Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 7

The following is a list of changes made in June, 1988 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 change bar on the page, #2 corresponding to the next change bar, and so on.

Page 3

#1 Description of Change

The responsibilities of the Superintendent-Technical Review and Projects have been deleted from this page and added verbatim on page 4.

Reason for Change

This change reflects the current organizational structure of Wisconsin Public Service Corporation (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 technical review program has been added to the list of responsibilities of 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.

Page 4

#1 Description of Change

The position of Superintendent-Nuclear Services has been deleted. The positions of Nuclear Services Supervisor and Superintendent-Nuclear Design Change now report directly 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 responsibilities of the Superintendent-Technical Review and Projects have been moved from page 3 to this page.

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.

#3 Description of Change

The responsibility for reactor engineering has been deleted from the Assistant Manager-Plant Operations. This responsibility has been assigned to the Superintendent-Plant Technical.

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.

#4 Description of Change

The responsibility for security activities at the Kewaunee Nuclear Power Plant (KNPP) have been assigned to the Assistant Manager-Plant Services.

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.

#5 Description of Change

The responsibility for reactor engineering has been assigned to the Superintendent-Plant Technical.

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 QQAP Description.

Page 5

#1 Description of Change

The responsibility for administrative activities at the KNPP has been assigned to the Superintendent-Plant Quality Control. Also, the sentence describing the position of Plant Security/Administrative Supervisor has been deleted.

Reason for Change

These changes reflect the current organizational structure of WPSC.

Safety Evaluation

These changes are administrative in nature and do not change the commitments made in the QQAP Description.

#2 Description of Change

The responsibility for administrative activities at the KNPP has been assigned to the Superintendent-Plant Quality Control.

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 QQAP Description.

Page 9

#1 Description of Change

A grammatical error has been corrected. The word "of" has been replaced with the word "to."

Reason for Change

This change corrects a grammatical error.

Safety Evaluation

This change does not affect the commitments made in the OQAP Description.

Page 24

#1 Description of Change

The wording "personnel experienced and trained commensurate with the scope of the activity being audited..." has been replaced with the wording "experienced personnel trained, in accordance with ANSI N45.2.23-1978, ..."

Reason for Change

This sentence describes the qualifications of the personnel conducting audits as discussed in this section of the OQAP Description. The previous wording was consistent with wording in Section 2.2 of ANSI N45.2.23-1978. The new wording was added to specifically identify ANSI N45.2.23-1978 as the basis for auditor qualification. This makes the OQAP Description less vague in this area.

Safety Evaluation

This change makes the OQAP Description more restrictive by identifying a specific ANSI standard as the basis for auditor qualification. Since the previous wording was consistent with ANSI N45.2.23-1978, the new wording does not reduce the level of commitment in the OQAP Description. Therefore, this change does not involve a safety concern.

Page 25

#1 Description of Change

The title changes and reorganization described in section 1.2 of the OQAP are depicted on this figure. In addition, a typographical error in the title of Superintendent-Nuclear Training/Health Physicist has been corrected.

Reason for Change

These changes reflect the current organizational structure of WPSC and correct a typographical error.

Safety Evaluation

These changes are administrative in nature and do not change the commitments made in the QQAP Description.

Page 26

#1 Description of Change

The position of Plant Security/Administrative Supervisor has been deleted.

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 QQAP Description.

Page 27

#1 Description of Change

A grammatical error has been corrected. The word "precedent" has been replaced with the word "precedence."

Reason for Change

This change improves the QQAP Description.

Safety Evaluation

This change does not affect the commitments made in the QQAP Description.

Attachment 2

To

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

Dated

June 10, 1988

Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 7
