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SUBJECT: Provides notification that WPSC intends to revise QA audit for subject audits from annually to biennially in effort to achieve more effective use resources.

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January 29, 1993

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
QA Program Audit Frequencies

- References:
- 1) Letter from G. C. Wright (NRC) to C. A. Schrock (WPSC) dated June 29, 1992
 - 2) Letter from C. W. Giesler (WPSC) to J. F. Streeter (NRC) dated August 22, 1983
 - 3) Letter from E. R. Mathews (WPSC) to J. G. Keppler (NRC) dated January 29, 1980

This letter provides notification that Wisconsin Public Service Corporation (WPSC) intends to revise the Quality Assurance (QA) audit frequencies for the subject audits from annually to biennially in an effort to achieve a more effective use of resources. This letter is in accordance with Reference 1 which contains an obligation to notify the Nuclear Regulatory Commission (NRC) of any changes to existing QA commitments in docketed correspondence outside of the Quality Assurance Program description.

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Revision and Control of the KNPP Technical Specifications (TS) and Operating License Audit

This audit is currently performed annually under the guidance of WPSC Quality Assurance Directive (QAD) 5.7. QAD 5.7 is primarily a document control audit; the actual verification of implementation of Kewaunee Nuclear Power Plant (KNPP) Technical Specification line items is accomplished through QAD 3.7 as part of all audits performed via the annual audit schedule, with all line items verified over a five year interval. A commitment to conduct this audit annually was made in Reference 2. Specifically; WPSC stated that a revision would be made to QAD 5.7 to include a requirement that an annual review be performed to verify that changes to the TS's are incorporated into plant procedures as necessary.

A review has been performed by WPSC of the last five years of audits conducted under QAD 5.7. Only one open item was issued due to a failure to properly complete a procedure form. This finding in no way diminished the effectiveness of the revision and control of TS's and the audits did not identify any situations where TS changes were not incorporated into plant procedures.

An additional review has also been performed of audit findings for all audits conducted at WPSC since 1987. This review identified 393 audit findings, of which only four were related to the incorporation of TS's into procedures. Three of these findings were identified during the period 1987-1989. This period corresponds to the last three years of the first comprehensive five-year TS Line Item Review cycle. It is anticipated that this type of finding would decrease upon completion of the initial review, as is evidenced by the fact that only one finding has been issued regarding this problem in the first three years of the second five-year cycle.

Discussions were also held with WPSC's Safety System Engineering (SSE) group relative to incorporation of Technical Specification requirements into procedures. The SSE group initiated the Safety System Functional Inspection program in the fall of 1988 and to date has inspected twelve plant systems. During these inspections, the SSE group identified two occurrences in which procedures had not been updated to reflect the TS amendments. These occurrences had minimal safety significance and neither of the occurrences resulted in TS violations. Based on the number of inspections performed and the small number of occurrences identified, WPSC believes these are isolated examples.

WPSC also performs a review of the Procedural Implementation of Technical Specifications (PITS) List upon receipt of a TS amendment. The PITS list contains the TS line item followed by the implementing procedures. The person responsible for updating the procedure is notified in the event a procedure is affected by the TS amendment. As an additional precaution, all department heads are notified by letter upon receipt of a TS amendment. This letter notifies the department head that the amendment was received and requests the department to review and revise all procedures affected by the TS amendment. This practice began in mid-1991.

Radwaste Program/Low Level Shipments Audit

This audit is currently performed annually under the guidance of WPSC QAD 12.2. Reference 3 provided further clarification of WPSC's response to NRC Bulletin 79-19 "Packaging of Low-Level Radioactive Waste for Transport and Burial". In this clarification, WPSC committed to implement an annual audit to assure that the current set of Department of Transportation (DOT) and NRC regulations are on site, and also committed to incorporate a point into the annual audit to assure that burial requirements from the present burial site are current.

A review has been performed by WPSC of the last five audits conducted under QAD 12.2. No open items were found related to the radioactive waste program. In addition, the NRC has reviewed QA audits during inspections and has not identified any problems or shortcomings in this area.

Safety Evaluation

It is WPSC's intent to revise the frequencies for these audits from annually to biennially. Section 14 of WPSC's Operational Quality Assurance Program (OQAP) states safety-related activities shall be audited within a two year period, and the frequency of audits shall be based upon the status and safety importance of the activity. Annual audit requirements for these audits are not required by the Code of Federal Regulations, KNPP Technical Specifications, NRC Bulletins, or the OQAP. Any audits required to be conducted at a specified frequency by 10 CFR will continue to be done at the required frequency. The current performance status as evidenced by recent QA and NRC inspections supports a reduction in audit frequency.

This is not a significant change to the program and does not impact the operation of the plant. It will allow a more effective use of resources by minimizing audits in areas where performance has traditionally been very strong. WPSC has therefore concluded this change does not decrease the level of quality provided by our QA Program and is proceeding to make this change.

If you have any questions please contact a member of my staff.

Sincerely,



C. A. Schrock
Manager - Nuclear Engineering

BJD/cjt

cc: US NRC, Region III
Mr. Pat Castleman, USNRC

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