

PRIORITY 2

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9501250128 DOC. DATE: 95/01/19 NOTARIZED: NO DOCKET #
 FACIL: 50-305 Kewaunee Nuclear Power Plant, Wisconsin Public Service 05000305
 AUTH. NAME AUTHOR AFFILIATION
 SCHROCK, C.A. Wisconsin Public Service Corp.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Discusses 940610 submittal of rev 15 to util operational QA program description.

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WISCONSIN PUBLIC SERVICE CORPORATION

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

January 19, 1995

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

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
Revision 15 of the Operational Quality Assurance Program Description

- References:
- 1) Letter from C. A. Schrock (WPSC) to Document Control Desk (NRC) dated June 10, 1994.
 - 2) Letter from C. R. Steinhardt (WPSC) to Document Control Desk (NRC) dated February 23, 1994.

Reference 1 submitted Revision 15 to Wisconsin Public Service Corporation's (WPSC's) Operational Quality Assurance Program Description (OQAPD). In this submittal, an exception to paragraph 5.2.15 of ANSI N18.7-1976 was added to identify alternate programs WPSC has in place to ensure the accuracy of safety-related procedures is maintained. A statement was also added to indicate that this change would not become effective until the issuance of Proposed Amendment No. 112 to the Kewaunee Nuclear Power Plant Technical Specifications (Reference 2).

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Document Control Desk
January 19, 1995
Page 2

In conversations between Mr. R. Pulec (WPSC) and Ms. P. Loughheed (NRC), it was agreed that WPSC should continue to review, prior to use, infrequently scheduled plant procedures that have not been used or reviewed for two years. It was also requested that WPSC's Operating Experience Assessment Program be added to the alternate programs identified in the OQAPD. The OQAPD has been revised accordingly, and the affected pages are attached.

A statement has also been added to include section 5.2.9, "Plant Security and Visitor Control," to the exceptions, interpretations, and qualifications to ANSI N18.7-1976. Plant Security and Visitor Control measures are implemented in accordance with the Kewaunee Security Manual.

Lastly, a revision was made to state that the Quality Assurance surveillance would be performed every two years, in contrast with our original submittal (Reference 1) which specified an annual frequency. This is in accordance with NRC guidance and was also discussed with Ms. Loughheed.

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

Sincerely,

C. A. Schrock

C. A. Schrock
Manager - Nuclear Engineering

BJD/san

Attach.

cc - US NRC Senior Resident Inspector
US NRC, Region III

Attachment to

Letter from C. A. Schrock (WPSC)

to

Document Control Desk (NRC)

Dated

January 19, 1995

Revision 15 of the Operational Quality Assurance Program Description

(revised pages)

PARTICULAR EXCEPTIONS AND QUALIFICATIONS

ANSI N18.7-1976

Section

3.1 Administrative controls shall be established necessary to comply with this standard as adopted, with the exceptions, interpretations, and qualifications addressed in this transmittal.

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. We will commit to apply this standard to those design activities which we deem are comparable in nature and extent to similar construction related activities, the provisions of which shall be employed as applicable to the degree of importance to safety for the design project under consideration. We shall also adopt the Regulatory Position of Regulatory Guide 1.64, Rev. 2, June 1976, as requested with an exception to position C.2. We will follow our existing practice that design verification should not be performed by the originator's supervisor, except where expertise is not available other than the supervisor immediately responsible for the design.

5.2.9 This section requires that procedures be developed to supplement features and physical barriers designed to control access to the plant and, as appropriate, to vital areas within the plant. Plant security and visitor control measures are implemented in accordance with the Kewaunee Security Manual, required by 10 CFR 50.34(c).

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. Compliance with the provisions of this standard and the Regulatory Position of Regulatory Guide 1.88, Rev. 2, October 1976, shall be deemed applicable to the nature and scope of the work

being performed and the importance of the item or service involved with the exceptions noted below.

- 5.2.15 This section requires that plant procedures which govern safety-related activities shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable. WPSC has alternate programs in place that make a biennial review process unnecessarily duplicative. These alternate programs ensure procedures are periodically reviewed and maintained current when pertinent source material is revised, the plant design changes, and/or any deficiencies occur. WPSC will also implement measures specifying that infrequently scheduled plant procedures that have not been used or reviewed for two years should be reviewed before use. Due to the significance of the Integrated Plant Emergency Operating Procedures (IPEOP's), the biennial review of the IPEOP's will be continued.¹

Alternate programs in place include the following:

1. Technical Specification revision process

This process includes a review of affected plant procedures upon the approval of a Technical Specification Amendment and subsequent revisions as appropriate.

¹The requirement for these alternate programs will be implemented upon the issuance of Proposed Amendment 112 to the Kewaunee Nuclear Power Plant Technical Specifications (letter from C. R. Steinhardt (WPSC) to the Document Control Desk (NRC) dated February 23, 1994).

2. Design Change Program

Nuclear department heads are notified of modifications and requested to review affected plant procedures. Revisions to procedures are made as appropriate.

3. Various Self-Assessment Programs

During self-assessment activities, procedures may be identified that contain significant discrepancies. Revisions are made as appropriate.

4. Incident Report Process

Any procedures identified as being in need of revision during the incident evaluation process are revised before the Incident Report is closed out.

5. Quality Assurance Program

At least every two years, a surveillance will be performed whereby randomly selected safety-related procedures would be checked for added assurance of timely revision of procedures.

6. Operating Experience Assessment Program

During operating experience assessment activities, procedures may be identified that contain significant discrepancies or require change. Revisions are made as appropriate. Significant changes to vendor manuals are evaluated as part of this program.

ANSI N45.2.9-1974

Section

4.3 & 4.4 Concerning Receipt Control.

~~The Nuclear Engineering Control~~ Group staff has been designated as the group responsible for receiving and storing records. This staff does not control which records are sent to them, however, there is a record index system identifying which records are under the control of the QA Program. We have assigned responsibility for assuring QA records are retained in the QA Vault to the various department heads. Also there is no log of incoming records. However, the previously-mentioned index is kept up to date and serves as a list of records received and retained. We have a procedure which partially covers the receipt control of records but none specifically for this action. We do not plan at this time to implement any further controls on the receipt of records.

ANSI N45.2.9-1974

Section

5.6 Concerning Permanent and Temporary Storage Facilities.

Criteria specified in this paragraph for those records stored in the QA Vault are met; however, the use of temporary storage facilities, the definition of a working QA document and the transport of QA records to the vault differ. Several in-house generated QA documents/records are maintained in working files, e.g., NSRAC Meeting Minutes, training records and radiological survey data. These documents/records which we feel are working documents until no longer used on a routine basis are kept in locked, fire-proof file cabinets and are periodically transferred to the QA Vault. Duplication or filing in the vault would be unacceptable due to the quantity and frequent use of these documents. We find our handling of these documents acceptable due to the

relative short duration of filing in temporary quarters and relative insensitivity of these documents to the safety of the plant. Finally, we do not have a courier service to immediately transfer a QA record just completed to the vault. Some records are transferred by personnel delivery and others through the routine in-company mail service. At this time we do not plan to implement any further controls on transferring documents to the QA Vault.

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