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SUBJECT: Forwards description of changes made to plant Operational QA Program. Rev 16 to QA Program encl.

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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

June 12, 1995

10 CFR 50.54(a)(3)

U.S. Nuclear Regulatory Commission  
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Ladies/Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Revision 16 of the Operational Quality Assurance Program Description

- Reference: 1) Letter from C. A. Schrock (WPSC) to NRC Document Control Desk dated June 10, 1994
- 2) Letter from M. A. Ring (NRC) to C. A. Schrock (WPSC) dated January 27, 1995

In accordance with the requirements of 10 CFR 50.54(a)(3), this letter submits the current description (Revision 16) of Wisconsin Public Service Corporation's (WPSC) Operational Quality Assurance Program. Revision 15 of this document was submitted on June 10, 1994 (Reference 1) and accepted by the Nuclear Regulatory Commission (NRC) on January 27, 1995 (Reference 2).

Attachment 1 to this letter describes the changes made to the OQAP Description, the reason for the change, and the bases for concluding that the revisions continue to satisfy the criteria of 10 CFR 50, Appendix B. These revisions have strengthened the program, clarified WPSC's commitments, and incorporated changes in WPSC's organization. Attachment 2 to this letter is Revision 16 of the OQAP Description.

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June 12, 1995

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This submittal identifies all changes made in conjunction with Revision 16 of the OQAP Description. WPSC has determined that none of the changes made reduce the commitments previously submitted and accepted by the NRC.

Sincerely,



Mark L. Marchi  
Manager - Nuclear Business Group

BJD

Attach.

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

Attachment 1

to

Letter from M. L. Marchi (WPSC) to NRC Document Control Desk

dated

June 12, 1995

Description of Revisions to the Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 16

Document Control Desk  
June 12, 1995  
Page 1

Based on organizational changes made at Wisconsin Public Service Corporation (WPSC), changes are being made to maintain the accuracy of the Operational Quality Assurance Program Description (OQAPD).

The organizational changes affect the entire nuclear engineering and technical support staff. This new organization is based on a team model, and will be led by the Manager - Engineering & Technical Support, reporting directly to the Senior Vice President - Nuclear, with group and process leaders supporting the manager in leadership of the organization and facilitation of engineering processes. The aim of the reorganization is to improve how we provide engineering and technical support to the Kewaunee Nuclear Power Plant (KNPP). This includes better definition and communication of the role of engineering and technical support as seen by the customers and by the people in the engineering process. Expected results of this organization change are an improved interface with engineering's customers and suppliers, and better defined and understood roles for all significant engineering and technical efforts.

In conjunction with the reorganization of the nuclear engineering organization, a nuclear business support group has also been created to provide business focus and support for the nuclear organization, and deal with selected Nuclear Department activities such as Joint Plant Operating Committee (JPOC), Public Service Commission of Wisconsin (PSCW), corporate interface, waste, and strategic planning. This group will be led by the Manager - Nuclear Business Group.

With the newly created positions of Manager - Engineering & Technical Support and the Manager - Nuclear Business Group, the former position of Manager - Nuclear Engineering was eliminated.

Changes have also been made within the Quality Programs Department. The Quality Groups (Quality Assurance, Quality Control, and Quality Engineering) have been further integrated into one Quality Programs team. The new organization is aligned on the three major processes that the Quality Programs Department is involved in: Audits/Assessments, Process Control & Inspection, and Procurement. Designated process leaders are responsible for the three processes, assembling work teams by drawing on all resources within the department; their main efforts are transformational (team) leadership, coaching, mentoring, and facilitation. The predicted result of these changes is a more effective department that can provide quick, correct responses to emergent issues, a streamlined collection of interrelated and interdependent processes, and flexibility in work assignments.

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Page 2

Specifically, the changes that affect the OQAPD are as follows:

Pages 2 & 12 Description of Change

Responsibilities of the Vice President - Power Supply & Engineering have been delegated to the Director - Nuclear Fuel.

Reason for Change

Due to organizational changes within Wisconsin Public Service Corporation, duties which were previously the responsibility of the Vice President - Power Supply & Engineering have been assumed by the Director - Nuclear Fuel.

Safety Evaluation

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

Pages 2,3,  
& 9 Description of Change

The position of Superintendent - Power Plant Design and Construction and the position of Assistant Superintendent - Plant Project Engineering have been deleted. The Power Plant Design and Construction group has been added to the list of "Other Key Groups" on page 9.

Reason for Change

The engineering and design support provided by the Power Plant Design and Construction group in support of the Kewaunee Nuclear Power Plant is minimal in comparison to earlier years of plant operation. Power Plant Design and Construction is now listed under "Other Key Groups" and is still responsible to implement the OQAP as applicable whenever their work involves the nuclear power plant.

Safety Evaluation

This change is administrative in nature. Titles of specific individuals within the Power Plant Design and Construction group have been deleted; however, the group is now listed under "Other Key Groups". This change does not reduce previous commitments in the OQAP Description.

Pages 3, 4, 5, 6, & 9    Description of Change

The title of Manager - Nuclear Engineering has been changed to Manager - Engineering & Technical Support on page 9. On pages 3, 4, 5, and 6, the responsibilities of the Manager - Nuclear Business Group and the Manager - Engineering & Technical Support are described. Specific titles of personnel reporting to the Managers have been removed; however, the functional areas for which the personnel in these positions are responsible are defined.

Reason for Change

The position of Manager - Nuclear Engineering has been eliminated and two new positions have been created: the Manager - Engineering & Technical Support and the Manager - Nuclear Business Group. The former responsibilities of the Manager - Nuclear Engineering associated with the engineering and technical support areas have been assigned to the Manager - Engineering & Technical Support. Nuclear business issues have been assigned to the Manager - Nuclear Business Group.

Safety Evaluation

The new Engineering & Technical Support organization is based on a team model, and will be led by the Manager - Engineering & Technical Support, reporting directly to the Senior Vice President - Nuclear, with group team leaders reporting directly to the manager.

A nuclear business support group has also been created to provide business focus and support for the nuclear organization, and deal with selected Nuclear Department activities such as Joint Plant Operating Committee (JPOC), Public Service Commission of Wisconsin (PSCW), corporate interface, waste, and strategic planning.

These changes reflect the current organizational structure of WPSC and do not reduce previous commitments in the OQAP Description.

Pages 3 & 4    Description of Change

Specific titles of personnel reporting to the Manager - Kewaunee Plant have been removed. However, the functional areas for which the Manager - Kewaunee Plant is responsible are still defined.

Reason for Change

The level of detail (i.e., specific position titles) has been removed to eliminate recurrent changes to the OQAP Description due to title changes.

Safety Evaluation

The functional areas for which the Manager - Kewaunee Plant assumes responsibility are still described. Removing titles of personnel who manage these areas has no affect on safety. These changes are administrative in nature and do not reduce previous commitments in the OQAP Description.

Pages 6 & 7 Description of Change

Specific titles of personnel reporting to the Manager - Nuclear Plant Support Services have been removed. However, the functional areas which the Manager - Nuclear Plant Support Services is responsible for are still defined. Also, the area of computer systems has been removed from the responsibilities of the Manager - Nuclear Plant Support Services. Computer system functions are now encompassed in the Engineering & Technical Support area.

Reason for Change

The level of detail (i.e., specific position titles) has been removed to eliminate recurrent changes to the OQAP Description due to title changes. The Computer Support group has been integrated into the Engineering & Technical Support group to enable more efficient interface between customer and supplier.

Safety Evaluation

The functional areas for which the Manager - Nuclear Plant Support Services assumes responsibility are still described. Removing titles of personnel which manage these areas has no affect on safety. Although the reporting structure of the computer systems group has been changed to the Engineering & Technical Support organization, this group continues to provide support to the entire nuclear organization. These changes are administrative in nature and do not reduce previous commitments in the OQAP Description.

Page 7 Description of Change

The position of Nuclear Personnel Supervisor has been deleted and the function of administrative activities has been added.



Reason for Change

The position of Nuclear Personnel Supervisor has been eliminated. The responsibilities associated with this position have been assumed by other personnel within the nuclear organization.

Safety Evaluation

The responsibilities associated with the former position of Nuclear Personnel Supervisor continue to be performed. This change is administrative in nature and does not reduce previous commitments in the OQAP Description.

Pages 7 & 8 Description of Change

Changes have been made within the Quality Programs Department. The Quality Groups (Quality Assurance, Quality Control, and Quality Engineering) have been further integrated into one Quality Programs team broadly aligned on a process basis. References to the Quality groups have been revised, as appropriate, throughout this document.

Reason for Change

These changes reflect the current organizational structure at WPSC.

Safety Evaluation

The new organization is aligned along the three major processes that the Quality Programs Department is involved in: Audits/Assessments; Process Control & Inspection; and Procurement. Designated process leaders are responsible for the three processes, assembling work teams by drawing on all resources within the department; their main efforts are transformational (team) leadership, coaching, mentoring, and facilitation. The predicted result of these changes is a more effective department that can provide quick, correct responses to emergent issues, a streamlined collection of interrelated and interdependent processes, and flexibility in work assignments. These changes do not involve a safety concern or decrease the effectiveness of the Quality Assurance Program.

Page 9

Description of Change

The Purchasing & Stores group has been added to the list of Other Key Groups.

Reason for Change

The Purchasing & Stores group provides support to the Kewaunee Nuclear Power Plant and is shown in Figure 1, "Offsite Functional Quality Assurance Organization." For consistency, this group is now discussed under the heading Other Key Groups.

Safety Evaluation

This change was made for consistency and is administrative in nature. This change does not involve a safety concern or decrease the effectiveness of the Quality Assurance Program.

Pages 11  
& 32

Description of Change

Process owners have been added as being responsible for the technical reviews of directives and for assuring QA records are retained in the QA Vault.

Reason for Change

Performing technical reviews of directives and assuring QA records are retained in the QA Vault is now the responsibility of both process owners and department heads.

Safety Evaluation

Due to the reorganization of the nuclear engineering organization, process owners have more responsibility in their areas of expertise. Directives continue to be reviewed by the Superintendent - Quality Programs to ensure consistency with the OQAP. This change is administrative in nature and does not decrease the effectiveness of the Quality Assurance Program.

Page 11

Description of Change

The title of Manager - Nuclear Engineering has been removed from the list of individuals responsible for reviewing and approving nuclear administrative directives. The titles of Manager - Nuclear Business Group and Manager - Engineering & Technical Support have been added.

Reason for Change

This change reflects the current practice at WPSC.

Safety Evaluation

Nuclear administrative directives are reviewed and approved by the Senior Vice President - Nuclear Power or the managers reporting to him. This change simply updates the titles of the managers reporting to the Senior Vice President - Nuclear Power. This change does not reduce previous commitments in the OQAP Description.

Pages 21  
& 22

Description of Change

In Section 15, "Nonconformance Report" has been changed to "Material Nonconformance Report." In Section 16, "Nonconformance Reports" has been changed to "Quality Assessment Reports" and their use for material deficiencies has been clarified.

Reason for Change

The title change in Section 15 was made for accuracy purposes. The correct title for the report used when a nonconforming item is identified during a receipt inspection is a "Material Nonconformance Report." In Section 16, the correct title for the report used for corrective action purposes is the "Quality Assessment Report."

Safety Evaluation

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

Page 23

Description of Change

The title of Manager - Nuclear Engineering has been removed from the list of individuals responsible for addressing technical deficiencies and recommendations and replaced with the Manager - Nuclear Business Group and the Manager - Engineering & Technical Support.

Reason for Change

This change reflects the current practice at WPSC.

Safety Evaluation

Technical deficiencies and recommendations generated during technical reviews are submitted to the responsible manager. This change simply updates the titles of the managers. This change does not reduce previous commitments in the OQAP Description.

Page 24

Description of Change

A statement has been added to the OQAPD to state that an audit of all safety-related functions is completed within a period of two years. A quality assurance program is in place to cover all auditable provisions of the Technical Specifications over a five year interval.

Reason for Change

Amendment No. 103 to the Kewaunee Technical Specifications (TS) deleted audit frequency requirements contained in the Kewaunee TS to allow WPSC flexibility in establishing audit frequencies based upon the performance of the program or organization being audited. This change provides clarification to the OQAPD that audits of all safety-related functions will continue to be completed within a period of two years.

Safety Evaluation

This change is being made for completeness and clarification purposes only and confirms WPSC's commitment to ANSI N18.7-1976. This change is administrative in nature and does not reduce previous commitments in the OQAP Description.

Figure 1

Description of Change

Figure 1 has been revised to depict the current offsite functional quality assurance organization at WPSC.

Reason for Change

This change reflects organizational changes previously described.

Safety Evaluation

Revisions were made to Figure 1 to maintain the accuracy of this organizational chart and reflect previously described changes. Changes made are administrative in nature and, therefore, do not involve a safety concern or decrease the effectiveness of the Quality Assurance Program.

Figure 2      Description of Change

Figure 2 has been revised to depict the current onsite functional quality assurance organization at WPSC.

Reason for Change

This change reflects organizational changes previously described.

Safety Evaluation

Revisions were made to Figure 2 to maintain the accuracy of this organizational chart and reflect previously described changes. Changes made are administrative in nature, and therefore, do not involve a safety concern or decrease the effectiveness of the Quality Assurance Program.

Page 29      Description of Change

Footnote 1 has been removed.

Reason for Change

A statement was added in Revision 15 of the OQAPD, approved by the NRC by letter dated January 27, 1995, to state that we have alternate programs in place which accomplish the biennial procedure review process. A footnote was also added which stated that these alternate programs would be implemented upon the issuance of Proposed Amendment 112 to the Kewaunee Nuclear Power Plant Technical Specifications. This proposed amendment was approved by the NRC by letter dated February 23, 1995; therefore, this footnote is no longer needed.

Safety Evaluation

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

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June 12, 1995

Page 10

Page 31      Description of Change

The reference to the Nuclear Engineering Control Group has been changed to the Records Management Group.

Reason for Change

This change reflects the current organizational structure at WPSC.

Safety Evaluation

Records Management was previously a function of the Nuclear Engineering Control group. Much of the Nuclear Engineering Control group has been integrated into the Engineering & Technical Support group. The function of Records Management has not changed. This change is administrative in nature and does not reduce previous commitments in the OQAP Description.