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 MARCHI, M.L.      Wisconsin Public Service Corp.      *See Report*  
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SUBJECT: Forwards Rev 18 to "Kewaunee Nuclear Power Plant Operational QA Program Description," IAW 10CFR50.54(a)(3).

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**WISCONSIN PUBLIC SERVICE CORPORATION**

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

June 13, 1997

10 CFR 50.54(a)(3)

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

Ladies/Gentlemen:

Docket 50-305  
Operating License DPR-43  
Kewaunee Nuclear Power Plant  
Revision 18 of the Operational Quality Assurance Program Description

- Reference: 1) Letters from M. L. Marchi (WPSC) to NRC Document Control Desk dated June 13, 1996 and October 23, 1996  
2) Letter from W. J. Kropp (NRC) to M. L. Marchi (WPSC) dated October 29, 1996

In accordance with the requirements of 10 CFR 50.54(a)(3), this letter submits the current description (Revision 18) of Wisconsin Public Service Corporation's (WPSC) Operational Quality Assurance Program. Revision 17 of this document was initially submitted on June 13, 1996 with changes clarified on October 23, 1996 (Reference 1) and accepted by the Nuclear Regulatory Commission (NRC) on October 29, 1996 (Reference 2).

Attachment 1 to this letter includes the effective pages and description of the changes made in conjunction with Revision 18 to the OQAP Description. Also included, are the reasons for the changes, 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 18 of the OQAP Description.

WPSC has determined that none of the changes have reduced the commitments previously submitted and accepted by the NRC.

Sincerely,

*Wann Meinhardt* 190094

for Mark L. Marchi  
Manager - Nuclear Business Group

RLB 9706200154 970613  
Attach. PDR ADOCK 05000305  
P PDR

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



*11 Q004*

50-305

KEWAUNEE

WPSC

REV 18 OPERATIONAL QA PROGRAM DESCRIPTION

Rec'd w/ ltr dtd 6/13/97.....9706200154

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ATTACHMENT 1

Letter from Mark L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

June 13, 1997

Description of Revisions to the Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 18

For your convenience and ease of review, we have provided a "strikeout" and "redlined" version. The "strikeout" shows what is in the current description (Rev. 17) and what KNPP is proposing to remove and/or change from. The "redline" (highlighted) shows what will be added and/or changed to (Rev. 18).

Specifically, the changes that affect the OQAPD are by page number and are as follows:

**All Pages**      **Description of Change**  
Add headers to each page to include title, revision date, revision number, and page number.

**Reason for Change**  
Identify each page as to what document it belongs.

**Safety Evaluation**  
This change is editorial in nature, and does not reduce previous commitments made in the OQAP Description.

**Page 1**      **Description of Change**  
"INTRODUCTION" - Split last sentence in first paragraph

**Reason for Change**  
Editorial, reads better.

**Safety Evaluation**  
This change is editorial in nature, and does not reduce previous commitments made in the OQAP Description.

**Page 2**      **Description of Change**

- Last sentence under Sr. VP-Nuclear Power, added "the".
- Changed title of "Power Supply and Engineering Executive" to "Vice President - Power Supply and Engineering"
- Changed "nuclear fuel" to "Nuclear Fuel Services"
- Changed "Director - Nuclear Fuel" to "Manager - Nuclear Fuel"

**Reason for Change**

- This change is editorial in nature, sentence structure.
- Due to organizational changes (retirements and personnel advancement) within the corporate structure.
- The Manager - Fuel Services, is and has been responsible for Nuclear Fuel Services Group, not just nuclear fuel.
- Title change only, same individual occupies this position.

**Safety Evaluation**

These changes are in title only, same individuals occupy these positions. This does not reduce previous commitments made in the OQAP Description.

- Administrative and editorial changes only. These do not reduce previous commitments made in the OQAP Description.

**Page 3**

**Description of Change**

Removed "... and ensuring support is available for special projects" from the first paragraph under Sr. VP - Finance and Corporate Service.

**Reason for Change**

"Special projects" is included in "activities", there is no reason to separate the two.

**Safety Evaluation**

This change is editorial in nature, and does not reduce previous commitments made in the OQAP Description. Purchasing and Stores Department, and Power Plant Design & Construction Group are available at anytime for assistance.

**Page 5**

**Description of Change**

- First paragraph, removed the word "and"
- Second paragraph, under Physical Change, added "plant modifications" in two places.

**Reason for Change**

- Sentence structure
- The physical change process includes modifications as well as changes.

**Safety Evaluation**

These changes are editorial in nature, and enhance the definition of Physical Change. These changes do not reduce previous commitments made in the OQAP Description.

**Page 6**

**Description of Change**

Added "Material Component System (MCS)"

**Reason for Change**

The "Material Component System (MCS)" is a computer program that displays information about equipment and components, vendors, and purchase orders.

**Safety Evaluation**

This change is administrative and editorial in nature, and enhances what "Plant Systems" is responsible for. This change does not reduce previous commitments made in the OQAP Description.

**Page 7**

**Description of Change**

Removed the last sentence of the first paragraph under Manager - Nuclear Plant Support Services.

**Reason for Change**

The last sentence was a duplication of the responsibilities described in the first sentence of the paragraph.

**Safety Evaluation**

This change is editorial in nature. This change does not reduce previous commitments made in the OQAP Description.

**Page 12**

**Description of Change**

Second paragraph under "2.3 Structure" added "Superintendent - Quality Programs"

**Reason for Change**

Superintendent - Quality Programs is also responsible for the approval of NADs that the Quality Programs group uses.

**Safety Evaluation**

This change is administrative and editorial in nature. The Superintendent - Quality Programs has always been responsible for NADs directing the Quality Programs group. This change does not reduce previous commitments made in the OQAP Description.

**Page 18**

**Description of Change**

Second paragraph under Section 10 "Inspection," changed "quality control" to "Quality Programs" and added "... who have been appropriately trained."

**Reason for Change**

The department name is Quality Programs. To allow others within the Quality Programs group, who has received proper training, to review packages.

**Safety Evaluation**

This change is administrative and editorial in nature. This change does not reduce previous commitments made in the OQAP Description. Reviews will continue to be conducted by personnel who have been appropriately trained.

**Page 19**

**Description of Change**

Fifth paragraph under Section 10 "Inspection," changed "Quality Process Control" to "Quality Programs."

**Reason for Change**

To make it more grammatically correct. The department name is Quality Programs.

**Safety Evaluation**

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

**Page 21**

**Description of Change**

- First paragraph under Section 14.0, second sentence, added "Inspection, test, and operating status provided by the..", and removed "... and the work request", replaced "are" with "is implemented through", replaced "...under the cognizance of..." with "by" and replaced "Process Control" with "Programs".
- Added third sentence

**Reason for Change**

- Changes are for sentence structure and grammatical.
- The Work Request Program is under the control of the Planning and Scheduling organization.

**Safety Evaluation**

These changes are administrative and editorial in nature. These changes do not reduce previous commitments made in the OQAP Description.



**Page 22**

**Description of Change**

Paragraph 14.2, changed "quality control" to "Quality Programs."

**Reason for Change**

To make the paragraph more grammatically correct. The department name is Quality Programs.

**Safety Evaluation**

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

**Page 24**

**Description of Change**

- Second Paragraph under Section 17, second sentence, removed "... will be filed in locked, fire resistant cabinets with controlled access, or duplicate records will be maintained at remote locations." and added "... shall be maintained in accordance with procedures which provide for control and protection of the records."
- Second Paragraph under Section 17, last sentence, changed to read, "Records may be maintained using microfilm, optical disk, or other approved technology provided appropriate quality control provisions have been established in the controlling procedures."

**Reason for Change**

To allow other industry approved media to be used to store records.

**Safety Evaluation**

- These changes are administrative and editorial in nature, and do not reduce previous commitments made in the OQAP Description. KNPP is still committed to maintaining working documents in locked, fire proof file cabinets as described in the "Particular Exceptions and Qualifications" Section of this OQAP Description (page 31).
- The use of other media to store records normally require industry approval

**Page 30 & 31 Description of Change**

Four places added "KNPP" preceding QA Vault.

**Reason for Change**

Provide correct name of vault and to stay consistent with the remainder of the OQAPD.

**Safety Evaluation**

These changes are administrative in nature, and do not reduce previous commitments or alter any exceptions made in the OQAP Description.

**Page 32**

**Description of Change**

- "Chairman of the Board" from "Chairman of the Board & CEO"
- "President & Chief Executive Officer" from "President & Chief Operating Officer"
- "Vice President Power Supply & Engineering" from "Power Supply & Engineering Executive"

**Reason for Change**

- Due to organizational changes (retirements and personnel advancement) within the corporate structure.

**Safety Evaluation**

These changes are administrative in nature, and do not reduce previous commitments or alter any exceptions made in the OQAP Description.

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## INTRODUCTION

The policy of Wisconsin Public Service Corporation is to comply with the requirements of the Operational Quality Assurance Program (OQAP) which is authorized under the direction of the Senior Vice President-Nuclear Power. The OQAP fulfills the requirements of 10CFR50 Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants." Compliance with the OQAP is mandatory for applicable WPS Resources Corporation employees. and Equivalent measures appropriate to the circumstance shall be enforced upon suppliers of materials, equipment or services.

The Operational Quality Assurance Program is established to define, implement and audit operation, maintenance, and modification activities related to nuclear plant safety. The OQAP complies with the provisions of ANSIN18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," with exceptions, interpretations, and qualifications noted in Appendix A of this description.

### 1.0 ORGANIZATION

#### 1.1 General Requirements

All members of the organization involved in operation of the Kewaunee Nuclear Power Plant shall be made aware of and recognize the necessity for well formulated and detailed administrative controls to assure safe and efficient operation. Lines of authority, responsibility and communication are established under the direction of the Senior Vice President-Nuclear Power and identify all levels of management involved in the OQAP, (See Figures 1 & 2). The quality assurance functions performed by each organizational element are cited in the descriptions below.

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1.2 Duties and Responsibilities

SENIOR VICE PRESIDENT-NUCLEAR POWER

Under the authority of this position the Operational Quality Assurance Program is established. This position has corporate responsibility for all matters relating to the administration, engineering, design, manufacture, construction, installation, maintenance, modification, test, start-up, licensing, training programs, commercial operation and quality assurance of the Kewaunee Nuclear Power Plant. This position is responsible for final review and approval of changes to the Operational Quality Assurance Program. This position is also responsible for the Independent Technical Review Program; however, the Nuclear Safety Review and Audit Committee (NSRAC) reports directly to a Senior Company Officer.

~~POWER SUPPLY AND ENGINEERING EXECUTIVE~~

~~VICE PRESIDENT - POWER SUPPLY AND ENGINEERING~~

This position is responsible for procurement, management, and disposition of nuclear fuel and fuel materials, and substation and transmission, and the implementation of the quality assurance requirements associated with these functions.

The ~~Power Supply and Engineering Executive~~ Vice President - Power Supply and Engineering has delegated his authority and responsibility of Nuclear Fuel Services to the Director Manager - Nuclear Fuel. Responsibility for reviewing and approving the directives which control the activities affecting quality performed by the Nuclear Fuel Cycle Group and the Nuclear Fuel Analysis Group, ensuring that the directives implement the requirements of the OQAP, and ensuring support is available for special projects involving the nuclear power plant has also been delegated to the Director - Nuclear Fuel.

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The Substation and Transmission Group is responsible for implementing the OQAP, as applicable, whenever their work involves KNPP.

#### SENIOR VICE PRESIDENT-FINANCE AND CORPORATE SERVICE

This position is responsible for the implementation of the Operational Quality Assurance Program requirements associated with the activities affecting quality performed by the Purchasing and Stores Department, and Power Plant Design & Construction Group ~~and ensuring support is available for special projects involving KNPP.~~

a. Purchasing and Stores Department

The Purchasing and Stores Department is responsible for providing support to procurement activities for KNPP.

b. Power Plant Design & Construction

The Power Plant Design & Construction Group is responsible for providing engineering and design support for KNPP, as requested. They also have responsibility for preparation, review, revision and issue of appropriate directives which control engineering activities performed primarily by this group.

#### MANAGER - NUCLEAR BUSINESS GROUP

This position is responsible to the Senior Vice President - Nuclear Power for providing general support to the entire Nuclear Department in key business related areas, including budgeting and planning, development of strategic issues and plans, and purchasing. This position is also responsible for providing interface with the WPSC corporate departments and with external agencies such as the Joint Plant Operating Committee, the Public Service Commission of Wisconsin, and other regulatory and industry groups.

MANAGER - ENGINEERING & TECHNICAL SUPPORT

This position is responsible to the Senior Vice President - Nuclear Power for the leadership and supervision of the Engineering and Technical Support group. The responsibilities of this position are centered around providing engineering support to the Kewaunee Nuclear Power Plant. The aspects of this support include, but are not limited to, the evaluation and implementation of physical changes to the plant, engineering evaluations of plant performance, and licensing issues, licensing support (including interface with the NRC), administration and implementation of engineering programs, providing specialized analytical skills as needed to support the plant, providing engineering support on a plant systems basis, and maintaining plant records through records management. These areas are described below:

Physical Change - The physical change process is the method for implementing changes to the plant such as permanent plant modifications/changes, temporary plant modifications/changes, and procurement technical evaluations. This area is not permanently staffed, but rather, is a process supported by the engineering and technical support staff.

Engineering Programs - All program areas are responsible for providing the specialist for that program. The program specialist is responsible for the management of the program, program performance and implementation. Project teams will be created when appropriate by supplementing the program specialists with Engineering & Technical Support staff or other nuclear staff. Responsibilities of the specialist and team include interaction with customers, senior nuclear management, and external entities (e.g., NRC, INPO, etc.) as necessary. The program team has complete ownership of the program, i.e., responsibility and accountability for successful implementation of the program. Examples of program areas are listed below:

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Computer Systems Program	NPRDS/Performance Reporting Program
ISI Program	Reactor Engineering Program
IST/Check Valve Program	Steam Generator Program
Licensing Program	STA Program
Heat Exchanger Performance Program	Turbine Program

Plant Systems - The system groups are responsible for providing the engineering and technical support for all plant processes, programs and systems. This includes supporting physical change, programs, projects, evaluations, maintenance of the USAR, Tech Specs, Tech Spec basis, system descriptions, drawings, specifications, procedures, Power Plant Facilities Information System (PPFIS), ~~Material Components System (MCS)~~, and QA typing documentation. Multi-discipline or multi-department teams are employed to address the engineering needs of the plant, where necessary.

Analytical Engineering - This group is responsible for providing specialized or computer based analysis support to the various groups in the E&TS. Engineering support provided by Analytical Engineering includes Accident Analysis, Probabilistic Risk Assessment, Piping Support and Stress Analysis, Equipment Qualification, Electrical Distribution and Coordination, Setpoint Analysis, and Seismic Analysis/SQUG. The personnel assigned to this group are responsible for assuring that their tools comply with the QA criteria for safety-related software, programmatic requirements, and commitments associated with their efforts.

Evaluations and Projects - The evaluations/projects process is a standard methodology for performing projects and evaluations. This area is not permanently staffed but is a process used by all engineering and technical support staff. Examples of existing evaluation processes that will be combined into this process are Operating Experience Assessments (OEA's), and Kewaunee Assessment Process (KAP), etc. The completion of the evaluation

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does not necessarily end the involvement in the activity. Should the evaluation lead to a physical change, or ongoing project, the team would be expected to continue involvement as required to ensure successful completion.

Records Management - Records Management is primarily responsible for receipt, maintenance, and overall control of records associated with the Kewaunee Nuclear Power Plant.

#### MANAGER - NUCLEAR PLANT SUPPORT SERVICES

This position is responsible to the Senior Vice President - Nuclear Power for plant activities associated with nuclear training, plant protective services, administrative/human resources, and nuclear emergency preparedness. This position has the responsibility for review, approval, and verification of implementation of nuclear administrative directives affecting quality for his area of responsibility. ~~—Those areas include nuclear training, plant protective services, administrative/human resources, and nuclear emergency preparedness as described below:~~

Nuclear Training - Nuclear Training has been delegated the responsibility to develop, maintain, and provide employee training that meets the needs of the Kewaunee Nuclear Power Plant (KNPP) and supports the needs of Wisconsin Public Service Resources (WPSR). Nuclear Training is responsible for the accredited training programs as described in National Academy of Nuclear Training Document 91-016, The Process for Accreditation of Training in Nuclear Power Industry. Specific responsibilities and duties for the various training activities are defined in the appropriate directives and implementing procedures.

Plant Protective Services - is responsible for plant security and fitness for duty programs. Specific responsibilities and duties for the various protective services activities are defined in the appropriate directives and implementing procedures.



The OQAP shall be applied to all activities affecting safety-related functions and include: physical changes, purchasing, fabricating, handling, shipping, storing, cleaning, erecting, installing, inspecting, testing, operating, maintaining, repairing, refueling, modifying, engineering, and training. The control over these activities shall be applied to an extent consistent with their importance to safety and shall take into account the need for special controls, processes, tests, equipment, tools, and skills to attain the required quality, and the need for verification of quality by inspection, evaluation, or test.

### 2.3 Structure

The OQAP manual is the top level quality program document for operational phase activities. The OQAP is a manual which incorporates the requirements of 10CFR50 Appendix B, the provisions of ANSI N18.7-1976 and ANSI N45.2.23-1978 and Regulatory Guides 1.8-Rev. 1, 1.30, 1.37, 1.38-Rev. 2, 1.39-Rev. 1, 1.54, 1.58-August, 1973, 1.64-Rev.2, 1.74, 1.88-Rev. 2 and 1.94. The requirements and responsibilities identified by the manual are implemented through directives, procedures, and instructions which prescribe activities affecting quality. Technical reviews of directives are provided by department heads or process owners. Review of Nuclear Administrative Directives, and Fuel Management Directives for consistency with the OQAP is provided for by the Superintendent - Quality Programs.

Nuclear administrative directives are reviewed and approved by the appropriate responsible individual (i.e., the Senior Vice President-Nuclear Power, the Manager - Nuclear Business Group, the Manager - Kewaunee Plant, the Manager - Engineering & Technical Support, Manager - Nuclear Plant Support Services or the Superintendent - Quality Programs). These directives are prepared to govern activities affecting quality, such as physical changes, procurement, licensing, training, document control, operation, procedure control, material control, maintenance, and other related activities.

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## 8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

Controls established for procurement shall ensure that safety-related materials, parts, and components are purchased under the requirements and documentation established by the Operational Quality Assurance Program. Implementing directives shall provide for a documented receipt and inspection of incoming material and equipment, along with providing a system for identifying the status of acceptable items to ensure use and installation of only correct and acceptable materials. Identification and traceability of safety-related materials, parts, or components from issuance to installation within the plant shall be provided by this system.

## 9.0 CONTROL OF SPECIAL PROCESSES

Special processes including welding and non-destructive examination shall be accomplished under controlled conditions by qualified personnel, in accordance with applicable codes, standards, specifications, criteria, and other special requirements. The Operational Quality Assurance Program is established to ensure compliance and implementation of these requirements.

## 10.0 INSPECTION

Concerning material receipt, directives shall establish a receipt inspection under the control of the Superintendent - Quality Programs, which provides for visual examination, receipt of required documentation, verification of identification, and on-site technical inspection.

Concerning modifications, the Plant Physical Change Program provides for the following requirements: special processes, test, measuring and test equipment, and cleanliness. The work package shall be reviewed by site Quality control Programs personnel who have been appropriately trained to ensure that the required special installation procedures are included in the package or properly referenced.

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Verification of conformance to established requirements shall be performed by individuals or groups who do not have direct responsibility for performing the work being verified. Personnel or groups assigned responsibility for verification of inspection or testing shall be delineated in appropriate procedures and directives.

Plant personnel performing inspection, examination, and testing functions which are associated with normal operations of the plant and certain technical reviews normally assigned to the on-site operations organization shall be qualified to ANSI N18.1-1971.

Plant personnel who will be performing inspection, examination, and testing functions which are not associated with normal operations of the plant shall be trained and qualified in accordance with the requirements of Regulatory Guide 1.58, "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel", and 10CFR50.55a, Subsection g, "Inservice Inspection Requirements", which endorse, with specific exceptions, ANSI N45.2.6-1973, "Qualifications of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants", except that QA experience cited for levels I, II, and III shall be interpreted to mean actual experience in carrying out the type of activity being performed. Quality Process Control Programs personnel will be qualified to these references with the noted exceptions.

WPS non-plant personnel who perform plant inspections, examinations and testing shall be trained and qualified in accordance with the above stated paragraph.

Additionally, this also applies to contract personnel working under the WPSC OQAP. Suitable review and acceptance must be made for qualification to other revisions or other standards the contractor's program may specify.

Training of personnel performing activities affecting quality shall be conducted to ensure that suitable proficiency is achieved and maintained.

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### 13.0 HANDLING, STORAGE, AND SHIPPING

Nuclear administrative directives shall provide a system for material and equipment handled at and shipped from the plant to prevent damage, deterioration or loss. Where necessary, for sensitive or high value items, specific written instructions or procedures will be utilized. Where necessary, special handling tools and equipment will be utilized.

Directives shall provide for special provisions for the control of items which might cause risk to the general public if damage should occur.

Directives shall also provide a system for controlling material during storage to prevent damage, loss, deterioration, or environmental damage. Housekeeping practices shall be controlled to prevent degradation in item quality.

### 14.0 INSPECTION, TEST, AND OPERATING STATUS

The measures required in this criteria are applied to two general categories, material control and operational control. ~~Inspection, test, and operating status provided by the material control and the work request program are is implemented through under the control of~~ plant directives which are controlled ~~under the cognizance of~~ by the Quality Process Control Programs organization. ~~Operational control, including the status of inspections, tests, and operations activities, is described in plant directives which are controlled by the Operations and Planning and Scheduling organizations.~~ All changes in procedures for these categories are reviewed by management. If the need for bypassing of a required inspection, test, or other critical operation occurs, it shall be procedurally controlled and reviewed by management.

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#### 14.1 Material Control

A receipt inspection at the plant site shall identify the status of acceptable items and shall provide for the control of uninspected and nonconforming items to ensure use and installation of only correct and acceptable materials. Physical identification shall be used to the maximum extent possible to identify the status of materials inspected. The system shall provide for documentation traceable to the item and segregation and disposition of nonconforming items to preclude misuse.

#### 14.2 Operational Control

The work request program shall include provisions for taking equipment out of service, identification of that equipment, and precautions or prerequisites for returning that equipment to service. The work request and supplemental documents shall be reviewed by Quality control Programs personnel to ensure that special processes, inspection (hold and witness points) and testing requirements are adequately specified. They are also reviewed by operations personnel to determine the effect on plant operations, the proper tagging out of service of equipment, and the protection of personnel and equipment.

#### 15.0 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

When a nonconforming item is identified during a receipt inspection, the condition shall be documented on a Material Nonconformance Report and the item identified or segregated to preclude misuse, further processing, or installation pending disposition. Material Nonconformance Reports will be controlled and evaluated by cognizant plant personnel for the determination of the disposition of nonconforming items. Material Nonconformance Reports and dispositions shall be submitted to the responsible organization for implementation of corrective action. Provisions shall be established to ensure that items dispositioned as "repair" or "rework" shall be reinspected and require documentation verifying the acceptability of the item prior to release for use.

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Technical deficiencies and recommendations generated during technical reviews shall be documented with the report. Technical deficiencies and recommendations shall be submitted to the responsible manager (i.e., Manager - Nuclear Business Group, Manager-Kewaunee Plant, Manager - Engineering & Technical Support or the Manager-Nuclear Plant Support Services) for disposition as deemed necessary.

#### 17.0 QUALITY ASSURANCE RECORDS

Directives shall be prepared to control records that are generated during the operation of the Kewaunee Nuclear Power Plant. These directives shall identify the types of records that are to be controlled including requirements for storage.

Records shall be primarily maintained in the KNPP QA Vault, the main records storage facility. Frequently used records, not stored in the KNPP QA Vault ~~will be filed in locked, fire resistant cabinets with controlled access, or duplicate records will be maintained at remote locations.~~ shall be maintained in accordance with procedures which provide for proper control and protection of the records. Such Records may be maintained using microfilm, optical disk, or other approved technology provided with appropriate quality control provisions have been established in the controlling procedures.

Records shall be kept for the prescribed periods of time in accordance with the requirements of Technical Specifications or Regulations. Directives shall provide for a system that permits the retrieval of information in a reasonable amount of time.

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ANSI N45.2.9-1974

Section

4.3 & 4.4      Concerning Receipt Control.

The Records Management Group 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 KNPP QA Vault to the various department heads or process owners. 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 KNPP 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.

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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 KNPP 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 KNPP QA Vault.



FIGURE 1  
OFFSITE FUNCTIONAL QUALITY ASSURANCE ORGANIZATION

