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SUBJECT: Forwards Rev 17 to "Kewaunee Nuclear Power Plant Operational QA Program Description." Attachment 1 describes changes made to operational QA program description, reason for change & bases for concluding.

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

June 13, 1996

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 17 of the Operational Quality Assurance Program Description

- Reference:
- 1) Letter from M. L. Marchi (WPSC) to NRC Document Control Desk dated June 12, 1995
 - 2) Letter from M. J. Jordan (NRC) to M. L. Marchi (WPSC) dated August 15, 1995

In accordance with the requirements of 10 CFR 50.54(a)(3), this letter submits the current description (Revision 17) of Wisconsin Public Service Corporation's (WPSC) Operational Quality Assurance Program. Revision 16 of this document was submitted on June 12, 1995 (Reference 1) and accepted by the Nuclear Regulatory Commission (NRC) on August 15, 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 17 of the OQAP Description.

This submittal identifies the changes made in conjunction with Revision 17 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

KEA/RLB/cjg

Attach.

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

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Attachment 1

Letter from Mark L. Marchi (WPSC)

To

Document Control Desk (NRC)

Dated

June 13, 1996

Description of Revisions to the Kewaunee Nuclear Power Plant

Operational Quality Assurance Program Description

Revision 17

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

Page 1

Description of change

Restate to "applicable WPS Resources Corporation", from "Wisc. Pub Service Corp".

Reason for Change

To reflect corporate restructuring.

Safety Evaluation

This organizational change does not reduce prior commitments, nor reduce management oversight of plant operations as previously identified in the OQAP Description.

Page 2

Description of change

Added "Nuclear Safety Review and Audit Committee";
Change position title from "Vice President- Power Supply and Engineering" to "Power Supply and Engineering Executive";
Add responsibility of "substation and transmission" to PS&E - Executive;
Remove gender inference of the above position, by repeating title;
Replaced "for these areas" with "of nuclear fuel";
Deleted last sentence of paragraph;
Added "The Substation and Transmission Group".
Remove several gender inferences

Reason for Change

Due to organizational changes, all duties which were previously the responsibility of the VP-PS&E were transferred to the new position of PS&E-Executive, which now includes Substation and Transmission. PPD&C now reports to the Senior VP-Finance & Corporate Services.
Define the acronym "NSRAC".

Safety Evaluation

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

Page 3

Description of Change

Added section pertaining to "Senior Vice President - Finance and Corporate Service";
Remove gender inference.

Reason for Change

Due to organizational changes, PPD&C and Purchasing & Stores now reports to the VP-Finance & Corporate Services.

Safety Evaluation

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

Page 4

Description of Change

Remove gender inferences
Remove "and the reactor engineering group" from Plant Operations.

Reason for Change

Reactor Engineering reports to Manager - Engineering & Technical & Support.

Safety Evaluation

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

Page 5

Description of Change

Remove gender inferences
Editorial changes to "Physical Change";
Replace "System group members" with "Engineering & Technical Support staff".

Reason for Change

The change of gender distinction was made to make position gender neutral.
Editorial changes to more clearly define group roles.

Safety Evaluation

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

Page 6

Description of Change

More clearly define responsibility of Plant services;
Added "Multi-discipline or . . ." to Plant Systems;
Replace "Incident Reports and Engineering Support Requests" with "Kewaunee Assessment Process (KAP)".

Reason for Change

To reflect consolidation of several processes that had previously identified and resolved discrepancies and problems through introduction of the KAP process.

Safety Evaluation

The KAP process was the result of process improvement and was introduced as a more effective system of managing and organizing review/responses to discrepancies and identified concerns and conditions.

Page 7

Description of Change

Remove gender inference for position of "Manager - Nuclear Plant Support Services;
Add "nuclear" to training;
Replace "security" with "plant protective services";
Add "nuclear" to emergency preparedness;
Replace "activities" with "/human resources";
Replace "These" with "Those";
Replace "activities" with "/human resources";
Add "nuclear" to emergency preparedness;
Expanded description of "Nuclear Training";
Add "is responsible for" and "Specific responsibilities and . . ." to Plant Protective Services.

Reason for Change

The change of gender distinction was made to make position gender neutral.
To reflect organizational changes, current department/group title designations and to more clearly define the Nuclear Training group.

Safety Evaluation

These changes were either clerical in nature or clarifications of positions and responsibilities. These changes do not reduce previous commitments made in the OQAP Description.

Page 8

Description of Change

Replaced "Activities" with "/Human Resources";
Replace "processing" with "administrative activities";
Added "Specific responsibilities . . ." to Administrative/Human Resources;
Added "Specific responsibilities . . ." to Nuclear Emergency Preparedness;
Remove gender inferences for position of Superintendent-Quality Programs;
Added "(OQAP)";
Replace "Quality Assurance" with "implementing".

Reason for Change

To reflect organizational changes, and current department/group title designations;
To reflect the replacement of QAD's with Quality Procedures;
The change of gender distinction was made to make position gender neutral.

Safety Evaluation

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

Page 9

Description of Change

Replace "Assurance" with "Programs".

Reason for Change

The former Quality Assurance department was merged with the Quality Control department to form what is now known as the Quality Programs department.

Safety Evaluation

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

Page 10

Description of Change

Added "changes to" Quality Assurance Typing Committee;
Deleted section entitled "OTHER KEY GROUPS".

Reason for Change

The Typing committee reviews only changes to QA typing;
The descriptions of "other key groups" have become addressed within their appropriate portions of the program Description.

Safety Evaluation

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

Page 11

Description of Change

Replace "Design Change" with "Plant Physical Change";
Restate to "applicable WPS Resources Corporation", from "Wisc. Pub Service Corp".

Reason for Change

To reflect the recent replacement of the former Design Change program with the Plant Physical Change program;
To reflect corporate restructuring.

Safety Evaluation

Replacing the former Design Change program with the Plant Physical Change program was the result of process improvement and had been evaluated and determined to more closely implement the WPSC OQAP. These changes do not reduce prior commitments, nor reduce management oversight of plant operations as previously identified in the OQAP Description.

Page 12

Description of Change

Replace "design" with "physical";
Capitalize "NAD's";
Delete "Quality Assurance Directives";
Delete paragraph pertaining to Quality Assurance Directives.

Reason for Change

To reflect the recent replacement of the former Design Change program with the Plant Physical Change program;
To reflect replacement Quality Assurance Directives with necessary Nuclear Administrative Directives.

Safety Evaluation

Replacing the former Design Change program with the Plant Physical Change program was the result of process improvement and had been evaluated and determined to more closely implement the WPSC OQAP. These changes do not reduce previous commitments made in the OQAP Description.

Page 13 **Description of Change**
Replace "Assurance" with "Programs".

Reason for Change
The former Quality Assurance department was merged with the Quality Control department to form what is now known as the Quality Programs department.

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

Page 14 **Description of Change**
Replace "Design" with "Plant Physical";
Replace "Design Control" with "Plant Physical Change".

Reason for Change
To reflect the recent replacement of the former Design Change program with the Plant Physical Change program.

Safety Evaluation
Replacing the former Design Change program with the Plant Physical Change does not reduce previous commitments made in the OQAP Description.

Page 15 **Description of Change**
Replace "design" with "Plant Physical Change";
Replace "(WPS)" with "(KNPP)".

Reason for Change
To reflect the recent replacement of the former Design Change program with the Plant Physical Change program;
Accurately define scope as limited to KNPP, as opposed to WPS wide.

Safety Evaluation
Replacing the former Design Change program with the Plant Physical Change does not reduce previous commitments made in the OQAP Description.

Page 16 **Description of Change**
Replace "design" with "Plant Physical".

Reason for Change
To reflect the recent replacement of the former Design Change program with the Plant Physical Change program.

Safety Evaluation
Replacing the former Design Change program with the Plant Physical Change does not reduce previous commitments made in the OQAP Description.

Page 19 **Description of Change**
Replace "design" with "Plant Physical".

Reason for Change
To reflect the recent replacement of the former Design Change program with the Plant Physical Change program.

Safety Evaluation
Replacing the former Design Change program with the Plant Physical Change process does not reduce previous commitments made in the OQAP Description.

Page 20 **Description of Change**
Replace "design" with "Plant Physical".

Reason for Change
To reflect the recent replacement of the former Design Change program with the Plant Physical Change program.

Safety Evaluation
Replacing the former Design Change program with the Plant Physical Change process does not reduce previous commitments made in the OQAP Description.

Page 24

Description of Change

Replace "Incident Reports" with "Kewaunee Assessment Process (KAP) forms";
Correct mis-spelling of "recurrence";
Replace "Incident Reports" with "KAP form(s)";
Replace "Assurance Directives" with "Procedures";
Replace "nonconformance or open-item" with "unacceptable condition";
Add "These findings shall . . .";
Replace "nonconformance or open-item" with "QAR's";
Replace "Assurance" with "Programs".

Reason for Change

To reflect consolidation of several processes that had identified discrepancies and conditions through introduction of the KAP process;
The former Quality Assurance department was merged with the Quality Control department to form what is now known as the Quality Programs department;
To reflect the recent replacement of the former Design Change program with the Plant Physical Change program.;
The remaining editorial changes are administrative in nature.

Safety Evaluation

Consolidation of the former Incident Report program into the Kewaunee Assessment Process program was the results of process improvement and has been evaluated and determined to not reduce previous commitments made in the OQAP Description;
Replacing the former Design Change program with the Plant Physical Change process does not reduce previous commitments made in the OQAP Description.

Page 25

Description of Change

Prefix QA Vault with "KNPP".

Reason for Change

Distinction between the KNPP and Green Bay record storage facilities was required.

Safety Evaluation

The title change is administrative in nature, and does not reduce previous commitments made in the OQAP Description.

Page 26

Description of Change

Replace "Quality Assurance Directives" with "appropriate directives, procedures, or instructions";
Replace "Quality Assurance Directives" with "directives or procedures".

Reason for Change

To reflect conversion of Quality Assurance Directives to Quality Procedures.

Safety Evaluation

Replacing the former QAD's was the result of merging the QA group into what is now the QP group. This does not reduce previous commitments made in the OQAP Description.

Page 29

Description of Change

Replace "design" with "physical";
Add "are made".

Reason for Change

To reflect the recent replacement of the former Design Change program with the Plant Physical Change program;
The editorial change is administrative in nature.

Safety Evaluation

These clerical nature of these changes do not reduce any previous commitments made in the OQAP Description.

Page 30

Description of Change

Replace "Design" with "Physical";
Replace "made as appropriate" with "verified as part of the Physical Change close-out process".
Replace "Incident Report" with "KAP corrective action";
Replace "incident" with "KAP";

Reason for Change

To reflect consolidation of several processes that had identified discrepancies and conditions through introduction of the KAP process.

Safety Evaluation

Consolidation of the former Incident Report program into the Kewaunee Assessment Process program was the result of process improvement and has been evaluated and determined to not reduce previous commitments made in the OQAP Description.

Figure 1

Description of Change

Change title from "President & CEO" to "Chairman of the Board & Chief Executive Officer";
Added Position of President and Chief Operating Officer
Change title from "Senior Vice President-Finance & Corporate Support" to "Senior Vice President-Finance & Corporate Services";
Change title from Vice President-Power Supply & Engineering" to "Power Supply & Engineering Executive";
Power Plant Design & Construction reports to Senior VP- Finance & Corporate Services.

Reason for Change

Due to organizational changes, titles of senior company officials were changed, and duties which were previously the responsibility of the VP-PS&E were transferred to the new position of PS&E-Executive, except for PPD&C, which now reports to the Senior VP-Finance & Corporate Service, and, Substation & Transmission has now been added to the Executive position.

Safety Evaluation

These organizational changes are administrative in nature, and do not reduce reportability or previous commitments made in the OQAP Description.

Figure 2

Description of Change

Added distinction between "Off-site" and "On-site" positions;
Removed position distinctions from bottom row of responsibilities and replaced "Nuclear Personnel" with "Administrative/Human Resources".

Reason for Change

Administrative title changes.

Safety Evaluation

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