

**BARBARA A. NICK**  
President and CEO



April 6, 2016

In reply, please refer to LAC-14380

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

**SUBJECT:** Dairyland Power Cooperative (DPC)  
La Crosse Boiling Water Reactor (LACBWR)  
Possession-Only License No DPR-45  
Docket Nos: 50-409 and 72-046  
Response to Request for Additional Information Regarding the Request for Review and Approval of Revision 29 to the Quality Assurance Program Description (CAC NO. L53102)

**REFERENCE:** (1) NRC Letter (RAI), Marlayna Vaaler to Barbara Nick, dated March 17, 2016  
(2) November 17, 2015 letter from DPC to NRC, Revisions 29 of the LACBWR Quality Assurance Program Description

This submittal responds to the reference RAI, requesting additional information related to the request for review and approval of Revision 29 to the Quality Assurance Program Description (QAPD). The RAI noted that the proposed revision contained a reduction in commitments for Personnel Training and Qualification.

Specifically, Revision 28 of the QAPD specified minimum qualifications for members of the Operational Review Committee (ORC) allowed for equivalent qualifications in accordance with American National Standards Institute (ANSI) Standard 18.1-1971 – Selection and Training of Nuclear Power Plant Personnel. Revision 29 of the QAPD replaced the ORC with the Qualified Technical Review (QTR) Process and allows for equivalent qualifications to be determined on a case by case basis.

After discussion with NRC staff, it was determined that Revision 29 of the QAPD will be modified. The use of equivalent experience and qualifications will be consistent with the intent of Regulatory Guide 1.8-1977 which directs that the criteria for selecting personnel in ANSI N18.1 is generally acceptable. Please replace page 10 of the QAPD, document submitted per Reference 2, with the attached modified Page 10. Please contact Cheryl Olson at 608-689-4207 if you have any further questions.

Sincerely,

Barbara Nick  
President and CEO

Enclosure

NMSS01  
NMSS 26

A Touchstone Energy<sup>®</sup> Cooperative

**cc:**

**Marlayna Vaaler  
Project Manager  
U.S. Nuclear Regulatory Commission**

**Cynthia Pederson  
Regional Administrator, Region III  
U.S. Nuclear Regulatory Commission**

the five year minimum may be substituted on a one-for-one basis towards the academic degree requirement (four years of technical experience being equivalent to a four year academic degree).

- Academic and technical experience must total a minimum of nine years.
- c. The position of Qualified Technical Reviewers shall meet the following minimum qualifications:
- Qualified Technical Reviewers shall be knowledgeable in the subject area being reviewed.
  - Qualified Technical Reviewers shall be individuals without direct responsibility for the document under review; these reviewers may be from the same functionally cognizant organization as the individual or group performing the original work.
  - Qualified Technical Reviewers shall have at least 5 years of professional experience and either a Bachelor's degree in Engineering or the Physical Sciences or shall have equivalent experience and qualifications which are consistent with the intent of Regulatory Guide 1.8-1977. The Project Manager shall appoint Qualified Technical Reviewers for decommissioning activities and the Site Manager, Genoa shall appoint Qualified Technical Reviewers for ISFSI-related activities.

### **III. DESIGN CONTROL AND REVIEW**

#### **A. General**

This section establishes the requirements to assure that Important To Safety (ITS) structures, systems, and components (SSCs) of the LACBWR ISFSI are added, deleted, changed or modified in accordance with the codes, standards, and regulations that governed the original design, except as amended and approved. Measures shall be established for the review, evaluation, and approval of all design changes governing ISFSI SSCs. The Engineering Manager (EM) shall ensure that the design control and review for ITS SSCs shall be performed by the appropriate Design Authority (ref. Appendix A) utilizing their approved 10 CFR 50 Appendix B or 10 CFR 72 Subpart G Quality Assurance Program.

Design, fabrication, or modification of storage and shipping casks used for shipment of radioactive materials will not be conducted under this section.

#### **B. Responsibilities**

1. The DPC staff is responsible for establishing procedures to implement