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July 1, 1985

VPNPD-85-32 NRC-85-7

Mr. J. G. Keppler, Regional Administrator Office of Inspection and Enforcement, Region III U. S. NUCLEAR REGULATORY COMMISSION 799 Roosevelt Road Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301 SUBMITTAL OF QUALITY ASSURANCE PROGRAM DESCRIPTION POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.54(a)(3), we are submitting the latest revision of Section 1.8 of our Final Safety Analysis Report, which describes the Quality Assurance Program being implemented for the Point Beach Nuclear Plant.

The QA Program description was last submitted to you in its entirety on June 28, 1984. The acceptance of the June 1984 revision, with one exception, was made in a letter from Mr. R. L. Spessard to Mr. C. W. Fay, dated September 28, 1984. Subsequently, Section 1.8.7 was revised to resolve the exception and was resubmitted on November 19, 1984. The purpose of this letter is to discuss changes in the QA Program description that have been made since the November 1984 submittal. We believe that none of the changes discussed below reflect a reduction in our QA Program commitments as previously approved by the NRC.

Changes as of June 1985

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The following provides an explanation and/or basis for changes made as of the June 1985 revision:

1. Page 1.8-1, Paragraph 1 - Streamlined the second sentence by replacing the words "is to assure" by the word "assures". Clarified the second sentence by deleting the word "quality" from the phrase "...Company quality objectives..." since quality is only one of many Company objectives which the Program is directed toward satisfying. The last sentence was clarified by removing the words "outline of". The Program is structured in accordance with the 18 criteria of Appendix B.

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- 2. <u>Page 1.8-1, Paragraph 2</u> Made an editorial change in the last sentence by replacing the phrase "...in accordance with the quality programs and applicable codes which are necessary..." with the words "... as necessary." Controlling items as necessary to provide assurance of quality implies the use of quality programs and codes. In that regard the previous wording was redundant.
- 3. <u>Page 1.8-3, Paragraph 3</u> Changed the word "indicate" in the last sentence to "dictate" for clarity.
- 4. <u>Page 1.8-4</u>, <u>Paragraph 3</u> The paragraph was rewritten to clarify the commitment.
- 5. <u>Page 1.8-5, Paragraph 1</u> Removed the word "various" to clarify that only one QA program exists for the Point Beach Nuclear Plant.
- 6. <u>Page 1.8-5</u>, <u>Paragraph 2</u> Include the words "and adequacy" in the last sentence to clarify the commitment.
- 7. <u>Page 1.8-5</u>, <u>Paragraph 3</u> Corrected a typographical error.
- 8. <u>Page 1.8-6</u>, <u>Paragraph 1</u> Clarification made by removing the word "quality" from "quality control" in item 2. Added item 4 to include the responsibilities associated with a recently implemented corrective action system.
- 9. Page 1.8-7 and 1.8-8 The Quality Assurance and Reliability Manual for Materials, Repairs and Modifications (QA Volume II) has been replaced by the Nuclear Power Department Quality Assurance Policy Manual. To supplement the Policy Manual, a Nuclear Power Department QA Procedures Manual has also been written. Section 1.8.2 has been revised to reflect these changes and has been reformatted to identify the hierarchy of the various policy, procedures and instructions associated with the Program.
- 10. <u>Page 1.8-9</u>, <u>Paragraph 5</u> Clarified the commitment by changing "or" to "and" in the first sentence.
- 11. <u>Page 1.8-11, Paragraph 2</u> Streamlined the last sentence by removing the phrase "to provide auditable documentation". Procurement documents are QA records which are properly maintained, retrievable and identifiable (i.e., auditable).
- 12. <u>Page 1.8-11</u>, <u>Paragraph 3</u> The last sentence was revised to clarify the commitment.
- 13. <u>Page 1.8-12</u>, <u>Paragraph 1</u> Add the words "and the necessary design control" to the third sentence to clarify the commitment.

Mr. J. G. Keppler

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- 14. Page 1.8-12, Paragraph 4 The first sentence was revised to include the control of revisions to documents.
- 15. Page 1.8-13, Paragraph 1 The paragraph was revised to clarify the commitments regarding the review of quality related documents and the assessment of quality requirements included in them.
- 16. <u>Page 1.8-13, Paragraph 2</u> Editorial change made to remove the word "required" from the third sentence.
- 17. <u>Page 1.8-17, Paragraph 5</u> Streamlined the wording in the last sentence by deleting extraneous words, "It can be demonstrated that".
- 18. Page 1.8-18, Paragraph 1 Editorial change to include the word "to" in the first sentence.
- 19. Page 1.8-18, Paragraph 3 Editorial revisions to replace the word "period" in the first sentence with the word "intervals" and to replace the ";" with the word "and" in the second sentence.
- 20. <u>Page 1.8-19, Paragraph 3</u> Various words added to clarify the commitments.
- 21. Figure 1.8-1 Reflects a title change (Executive Vice President) and a reorganization having the Engineering & Construction Department and the Environmental Department reporting to a single Senior Vice President.
- 22. Figure 1.8-4 Reflects the changes in "Unit" titles within the Nuclear QA Division.

If you have any questions in regard to the above discussion or the attached information, please contact us.

___Very truly yours,

Vice President-Nuclear Power

C. W. Fay

Attachment (FSAR Section 1.8)

Copies to NRC Resident Inspector NRC Document Control Desk Washington D.C. (original)

QUALITY ASSURANCE PROGRAM

In accordance with Paragraph 50.34 of 10 CFR 50 and 71.24 of 10 CFR 71, a Nuclear Quality Assurance Program Description is herein provided by Wisconsin Electric Power Company (WE). This Program assures that the required manpower, procedures, and management of Point Beach Nuclear Plant are directed toward satisfying the Company objectives of providing safe and reliable structures, systems, and components; and complying with the provisions of 10 CFR 50, Appendix B "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants"; 10 CFR 71, Subpart H "Quality Assurance Criteria for Shipping Packages for Radioactive Material"; and the applicable Sections of the ASME Boiler and Pressure Vessel Code. The program described is structured in accordance with the 18 criteria of Appendix B.

The following describes the quality assurance program established and imposed by the Company for application to the functional aspects of structures, systems, and components, including the design, purchasing, construction, and fabrication, handling, storage, shipping, cleaning, installation, erection, inspection, testing, operation, maintaining, refueling, repair, and modification of equipment considered significant to safety by the Company. These structures, systems, and components may be classified as safety-related in that they prevent or mitigate the consequences of postulated accidents, or as in the case of radioactive material packaging and fire protection, they may contribute to causing undue risk to the health and safety of the public or loss of services should they fail or malfunction. Structures, systems, and components not classified as safety-related items are controlled as necessary to provide assurance of quality commensurate with the importance of the function(s) to be performed.

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ANSI N45.2.8-1975	Supplementary Quality Assurance Requirements			
	for Installation, Inspection, and Testing of			
	Mechanical Equipment and Systems for the Con-			
	struction Phase of Nuclear Power Plants			
ANSI N45.2.9-1974	Requirements for Collection, Storage, and Main			
	tenance of Quality Assurance Records for Nuclear			
	Power Plants			
ANSI N45.2.10-1973	Quality Assurance Terms and Definitions			
ANSI N45.2.11-1974	Quality Assurance Requirements for the Design			
	of Nuclear Power Plants			
ANSI N45.2.12,	Requirements for Auditing of Quality Assurance			
Draft 4, Rev.2	Programs for Nuclear Power Plants			
ANSI N45.2.13-1976	Quality Assurance Requirements for Control of			
	Procurement Items and Services for Nuclear			
	Power Plants			
ANSI N101.4-1972	Quality Assurance for Protective Coatings			
	Applied to Nuclear Facilities			

To the extent required by ANSI N18.7-1976 as hereinafter specifically noted, PBNP hereby commits to the above standards. Table 1.8-1 provides further information regarding commitments to regulatory guides and related standards.

1.8.1 ORGANIZATION

The authorities and responsibilities of persons and organizations performing quality related activities are established, assigned, and documented in a formal system. All quality assurance and quality control functions are performed by the Company QA organization (including both on-site and off-site personnel) except when the scope of specific projects dictate the need to engage contractors to perform specific services.

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Those persons and organizations assigned such functions are given appropriate and sufficient authority and organizational freedom to identify quality problems; verify implementation of the solutions; and prevent further processing, delivery, installation, or use of nonconforming items until proper dispositioning has occurred.

The organizational structure and functional responsibility assignments are such that: (1) attainment of quality objectives is accomplished by individuals assigned responsibility for specifying quality or performing work to specifications, (2) audits verifying conformance to established quality requirements are accomplished by those who do not have direct responsibility for performing the work being verified, and (3) personnel in key quality assurance functions have direct access to responsible management. The education and experience required of individuals assigned to QA positions is documented and approved by management.

The operating organization is reflected in Figure 15.6.2-2 of the Technical Specifications. The organization for quality assurance is reflected in Figures 1.8-1, 1.8-2, 1.8-3, and 1.8-4. The Vice President-Nuclear Power Department, who reports directly to the President, has been delegated the authority by the President to establish quality assurance policies, goals, and objectives as applicable to the Point Beach Nuclear Plant and the Nuclear Power Department although the President retains ultimate responsibility.

Manager - Point Beach Nuclear Plant

The Manager-Point Beach Nuclear Plant is the senior company representative at the plant facility and, as such, is in direct day-to-day control of all normal plant administrative, technical operations and quality assurance. The Quality Assurance Coordinator reports to the Manager-Point Beach Nuclear Plant on quality-related matters. Quality Assurance Representatives report to the Quality Assurance Coordinator as members of the Quality, Standards & Records Organization as shown in Figure 1.8-3. The QA Coordinator and the QA Representatives (including participation on the Quality Standards, & Records Organization) are concurrent assignments.

General Superintendent of Quality Assurance

The General Superintendent of Qualtity Assurance reports to the Vice President-Nuclear Power Department. He is responsible for integrating the quality assurance program within the company including providing off-site quality assurance support for Point Beach.

Quality Assurance Committee

The Wisconsin Electric Quality Assurance Committee consists of Company officers and an outside consultant each designated by the President. The Quality Assurance committee assesses the adequacy and effectiveness of the Quality Assurance Program by reviewing quality assurance policies, procedures, and practices and through periodic initiation of audits. The Chairman of the Committee is appointed by the President. The Committee meets on a periodic basis, normally quarterly, but no less than three times per year to review the status and adequacy of quality-related activities.

Off-Site Review Committee

The Off-site Review Committee (OSRC) is established in accordance with Technical Specifications, Section 15.6.5.3. The OSRC selectively reviews designated activities involving the operation of Point Beach Nuclear Plant including Technical Specification compliance. Specific duties and responsibilities are described in the plant Technical Specifications, Section 15.6.5.3.

General Responsibilities

The responsibilities of individuals or groups performing QA functions are documented and approved by management. General responsibilities are as follows:

QA Coordinator

1. Assist plant groups on matters dealing with quality, codes and standards interpretation, interpretation and applica

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tion of the in-plant quality assurance manuals, regulatory record keeping and regulatory inspection activities.

- Administer the quality assurance and control aspects of ordering, storage, usage, and documentation of quality assurance spare parts and equipment in the plant.
- 3. Perform technical audits of plant groups with respect to the adequacy and implementation of quality assurance procedures and instructions and the adequacy of documentation (Section 1.8.18).
- 4. Provide plant control of corrective action required due to observed documentation or physical infractions of the Quality Assurance Program.

QA Representative

- Report to the QA Coordinator observed documentation or physical infractions of quality assurance procedures and instructions or suspected violations of Technical Specification, State and Federal codes or standards, and commitments to Regulatory Guide positions.
- Assist their respective group in conforming with the Operating Point Beach Nuclear Plant Administrative Control Policies & Procedures Manual.
- 3. Maintain and help coordinate the required storage of quality assurance records pertaining to their respective groups.

Quality Assurance Section

- 1. Review QA scope purchase documents to assure adequate quality requirements (Section 1.8.4) are established.
- 2. Verify conformance of received items to purchase document requirements through various activities including source verification, as appropriate, and review documentary evidence of quality for procured items prior to release of the items (Section 1.8.7).

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1.8-6

- 3. Perform quality assurance evaluations of vendors and contractors commensurate with the importance, complexity, and quantity of the product or services and assure vendor compliance with established requirements through audit and surveillance activities (Section 1.8.7).
- 4. Perform audits of the quality assurance program as implemented on-site by Plant personnel and contractors (Section 1.8.18). Also audit off-site company organizations performing qualityrelated activities for Point Beach.

1.8.2 QUALITY ASSURANCE PROGRAM

A quality assurance program is established and implemented in accordance with written policies, procedures, and instructions which comply with the requirements of 10 CFR 50 Appendix B and 10 CFR 71, Subpart H. The program is also applied to activities such as fire protection to a degree commensurate with Wisconsin Electric commitments. Specific QA Program applicability to fire protection and radioactive material packaging is addressed in Tables 1.8-2 and 1.8-3, respectively. The Nuclear Power Department Quality Assurance Program is set forth in the "Nuclear Power Department Quality Assurance Procedures Manual", the "Nuclear Power Department Quality Assurance Procedures Manual", and the "Administrative Control Policies and Procedures Manual" (QA Volume I). Control of the above manuals is as follows:

- Distribution and maintenance of the "Nuclear Power Department Quality Assurance Policy Manual" and revisions thereto are controlled by the General Superintendent of Quality Assurance. The Manual is reviewed and approved by the Vice President-Nuclear Power Department.
- 2. Distribution and maintenance of the "Nuclear Power Department Quality Assurance Procedures Manual" and revisions thereto are controlled by the General Superintendent of Quality Assurance. The manual procedures are reviewed and approved by each of the section heads within the Nuclear Power Department.
- 3. Distribution and maintenance of the "Administrative Control Policies & Procedures Manual" (QA Volume I) and revisions thereto is controlled by Point Beach Nuclear Plant. The manual is reviewed and approved on-site by the plant organization.

1.8-7

Final responsibility for modifications, repairs, maintenance, and operations, including the quality assurance program, lies with the President. Management review of the status and adequacy of the quality assurance program is accomplished by at least semiannual review by the WE QA Committee (Section 1.8.1) and by regular briefings (at least once every two months) with the President.

The quality assurance program applies to structures, systems and components (including expendable and consumable items which are used therein) which are considered important to safety from the standpoint of safetyrelated functions to be performed. The structures, systems and components considered important to safety are identified in the Nuclear Power Department Quality Assurance Policy Manual. This list is consistant with requirements of the regulations as described in this FSAR, and also includes non safety-related systems and components requiring quality assurance coverage such as fire protection and radioactive material packaging. Positive controls are implemented to assure updating of the list as necessary.

The classification of a system or component as important to safety does not imply that the complete system, or all the components or component parts within that system, are important to safety. Those specific items within a system considered important to safety are also identified in the Nuclear Power Department Quality Assurance Policy Manual.

The program provides for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. The indoctrination and training program is structured to assure that:

1. Personnel performing quality activities are instructed as to the purpose, scope and implementation of the quality-related manuals, procedures and instructions; and it is emphasized that these are mandatory requirements which must be implemented and enforced.

- Personnel performing quality-related activities are trained and qualified in the principles and techniques of the activity being performed.
- Appropriate training procedures are established and that records of training are maintained.

Section 5.2.10 of ANSI N18.7-1976 states that the provisions of ANSI N45.2.3-1973 shall be applied to those activities which are comparable in nature and extent to related activities occurring during construction.

Point Beach Nuclear Plant practices good housekeeping and cleanliness involving activities performed by plant and contractor personnel to maintain the necessary standard of cleanliness.

Scheduled and documented daily-to-weekly surveys of potentially contaminated or radioactive areas are conducted by health physics personnel, followed by decontamination or radioactive cleanup as necessary, ensure cleanliness checks of even the least traveled areas. An additional program provides that Operations shifts are assigned specific plant areas to patrol and clean up as a housekeeping duty. Plant policy endorses and enforces the concept that each person is responsible for cleanliness and good housekeeping in their own immediate work area. Final inspections of work areas following completion of work, including final internal inspections of pressure vessels, tanks, etc., are routinely completed by super-Such inspections are formally documented only in visory personnel. special cases when considered necessary; these normally being final inspections by plant supervisory personnel following work by outside contractors.

Storage of items are controlled to defined quality assurance and fire protection requirements. Access to safety-related equipment or radiation controlled areas is controlled by security regulations or defined health physics rules.

PBNP complies with OSHA regulations in the physical safety and environmental condition of work places.

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Significant attention to housekeeping is provided by plant management including frequent housekeeping inspections of portions of the plant by the Manager-Point Beach Nuclear Plant. This constitutes a complete and in-depth inspection of essentially the total plant on a weekly basis.

1.8.3 DESIGN CONTROL

Procedures and practices are established and documented to assure that applicable regulatory requirements and design bases are correctly translated into design documents, such as specification and drawings, for work involving changes or additions to the original design of safety-related structures, systems, and components. These measures include provisions to assure that appropriate quality standards are specified and included in the design documents and that deviations from such standards are controlled. The measures also include provisions to control selection and review for the suitability of application of materials, parts, equipment, and processes that are essential to the safety-related function.

Procedures and practices are established and documented for the identification and control of design interfaces and for coordination among design organizations. These include procedures among participating design organizations for the review, approval, release, distribution, and revision of design documents. The design control measures provide for verifying or checking the adequacy of design by design reviews, by alternate or simplified calculational methods, or by suitable testing programs performed by individuals or groups other than the originator.

Where a test program is used to verify the adequacy of a specific design feature, provisions include suitable qualification testing of a prototype unit under the most adverse design conditions. Design control measures consider, as appropriate, reactor physics; stress, thermal, hydraulic, and accident analyses; compatibility of materials; accessibility for inservice inspection, maintenance and repair; and delineation of acceptance criteria for inspections and tests.

Further changes to designs are subjected to commensurate design control measures. When a contemplated change is considered by appropriate manage-

ment to be of sufficient scope as to be beyond the expertise of in-house personnel, these changes are reviewed by the organization that performed the original design, or other design organizations determined to be equally qualified. Section 5.2.7.2 of ANSI N18.7-1976 requires that design activities associated with modifications of safety-related structures, systems and components be performed in accordance with the provisions of ANSI N45.2.11-1974. Design activities associated with modifications of Section 8 of ANSI N45.2.11-1974.

PROCUREMENT DOCUMENT CONTROL

Procedures and practices are established and documented to provide assurance that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are included or referenced in the documents for procurement of materials, products, or services. These measures are applied to spare and replacement parts and equipment, new material, and equipment and contracting of services. Procedures require that procurement documents be prepared, reviewed, and approved in accordance with QA program requirements. The Quality Assurance Section reviews procurement documents to ensure the inclusion of adequate quality criteria. Records of the review are maintained.

Procurement documents require suppliers, contractors, or subcontractors to implement quality assurance programs to the extent necessary. The programs are reviewed by the QA Section, qualified contractors, or industry organizations such as the Coordinating Agency for Supplier Evaluation (CASE). The evaluation and qualification of supplier programs is documented.

Further details of the system for control of procurement documents is contained in Section 1.8.7.

1.8.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Activities affecting quality are prescribed by documented instructions, procedures or drawings appropriate to the work at hand with the work accomplished in accordance with these documents. Measures have been established for the preparation, revision, and control of procedures, instructions, or drawings.

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1.8-11

Instructions, procedures, and drawings are required to include appropriate quantitative or qualitative acceptance criteria to ensure work has been satisfactorily accomplished. Supervisors may direct that data be taken without the data taker being cognizant of the acceptance criteria when it is considered that forehand knowledge of the acceptance criteria may prejudice results. The Supervisor is then reponsible to verify conformance. To the extent applicable, as-built drawings and original equipment and system specifications, subject to improvements based upon operational experience and subject to the necessary design control, establish acceptance criteria. When required, these instructions, procedures, and drawings provide methods for complying with appropriate regulations.

Section 5.2.2 of ANSI N18.7-1976 requires that temporary major procedure changes which do not change the intent of an approved procedure be approved by two members of the plant staff knowledgeable in the areas affected by the procedure. One of these individuals is to be the Duty-Shift Supervisor who holds a senior operators license. As described in Section 15.6 of the Technical Specifications, Point Beach follows the above guidance for operating procedures. For Maintenance, Instrumentation and Control, Reactor Engineering, and Chemistry and Health Physics procedures, approval is not required from the supervisor in charge of the shift for temporary changes. For a further description of the system for temporary changes, refer to Section 15.6.8 of the Technical Specifications.

Section 5.3.2 of ANSI N18.7-1976, which discusses the content of procedures, states in part, "...procedures shall include, as appropriate...(8) Acceptance Criteria." PBNP has determined through considerable experience that the incorporation of acceptance criteria is not always advantageous, as discussed herein.

1.8.6 DOCUMENT CONTROL

Procedures and practices are established and documented to control the issuance and revision of documents, such as: maintenance and modification procedures; design specifications; design, manufacturing, construction, and installation drawings; procurement documents; manufacturing, inspection,

and testing instructions; test and operating procedures; and QA manuals, safety analysis reports, and related design criteria documents. The procedures identify the group responsible for review, approval, and issuance of the documents. For quality related documents, the review includes an assessment of applicable quality requirements.

The procedures provide assurance that documents, including changes, are reviewed for adequacy and approved for use by authorized personnel and are distributed to and used at the location where the prescribed activity is performed prior to commencement of the activity. These include prompt issuance of changes and control of the obsolete or superseded documents to prevent inadvertent use. Controls, such as maintenance and distribution of indices, are also implemented to identify the current revision of a document to be used. These provisions are also used as a basis for auditing the document control system. Document control procedures include provisions for determining the appropriate group for reviewing changes to documents.

Documents classified as QA records are subjected to the additional requirements described in Section 1.8.17.

1.8.7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

Procedures and practices are established and documented to assure that purchased material, equipment and services conform to the procurement documents. These measures include review of all plant initiated purchase requisitions by the QA Coordinator or his designee and subsequently, QA scope requisitions are reviewed by the QA Section to verify incorporation of appropriate quality requirements. Additionally, all requisitions initiated by Nuclear Engineering are reviewed by the QA Section.

The bases for selection of suppliers include previous experience, meeting the required qualifications of the contractor who erected the Plant on a "Turnkey" basis, or a pre-award evaluation of the proposed supplier's capabilities and qualifications. Industry programs, such as those applied by the American Society of Mechanical Engineers (ASME) and the Coordinating exceptions are in job functions not discussed in ANSI N18.1-1971 and certain inspection and test personnel who work for contractors as discussed below.

All positions at Point Beach have been evaluated to determine the minimum qualification requirements. The areas considered during the evaluation included regulation, code and standard requirements, education and training, work experience, and physical condition. Applicants for positions at Point Beach who do not meet the minimum requirements, or who do not pass a battery of preemployment aptitude tests are not considered for the position. Additionally, prior to employment, all plant personnel are interviewed by senior plant management and in most cases are interviewed by the Manager-Point Beach Nuclear Plant who makes the final determination of acceptability. There is only one level of qualification at Point Beach, not three levels as indicated in ANSI N45.2.6-1973.

When the extent of the maintenance or modification is such that it must be performed by contract, the potential contractor's QA program is evaluated by the QA Section to determine its acceptability. Included in the evaluation is consideration of the qualifications of inspection and testpersonnel. In cases where it is determined that a contractor's organization is suitably qualified in all other respects, including qualified personnel, a qualification and certification program which meets all the requirements of ANSI N45.2.6-1973 is not insisted upon. Implementation of the audit program assures qualification of such personnel.

All nondestructive examination personnel are required to be qualified in accordance with the appropriate sections of SNT-TC-1A.

Section 3.2 of ANSI N18.7-1976 requires that verification of conformance be performed by individuals other than those who performed or directly supervised the work. Verification of conformance is conducted in this manner at Point Beach.

Section 5.2.17 of ANSI N18.7-1976 requires inspections for modifications

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1.8-17

and non-routine maintenance to be performed in a manner similar to that associated with construction phase activities. Modifications and nonroutine maintenance for which outside contractors are utilized are performed in this manner. Modifications and non-routine maintenance items within the capablities of the onsite operating organization are performed as a routine maintenance activity.

1.8.11 TEST CONTROL

Procedures and practices are established and documented to provide a program of periodic testing and continuing surveillance to demonstrate that structures, systems, and components continue to perform satisfactorily in service. The measures require tests to be performed in accordance with written test procedures which incorporate the requirements and acceptance limits (except as noted in Section 1.8.5) from applicable design documents by appropriately trained and qualified personnel. Test procedures include provisions for assuring that all prerequisites for the test have been met, that adequate test instrumentation is available and used, and the test is performed under suitable environmental conditions. Test results are documented and evaluated to assure test requirements have These measures require replacement or modified strucbeen satisfied. tures, systems and components to be subjected to sufficient proof, preoperational, and operational testing to demonstrate that they will perform satisfactorily in service.

1.8.12 CONTROL OF MEASURING AND TEST EQUIPMENT

Positively controlled procedures and practices are established and documented to assure that tools, gauges, instruments, and other measuring and testing devices used in activities affecting quality are properly identified, controlled, calibrated, and adjusted at specific intervals to maintain accuracy within necessary limits. Calibration procedures specify standards to be used for performing the calibration and procedure preparation assures that standards used have greater accuracy than the item being calibrated. These measures provide for identification of the equipment and associated records and appropriate corrective action when out-of-calibration conditions are noted.

1.8.13 HANDLING, STORAGE, AND SHIPPING

Procedures and practices are established and documented to control the handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions by qualified individuals to prevent damage or deterioration and preclude loss of identification. The measures include specification and use, when necessary, of special protective environments, such as inert gas atmosphere, specific moisture content, and temperature levels.

1.8.14 INSPECTION, TEST, AND OPERATING STATUS

Procedures and practices are established and documented to indicate by suitable means, the status of inspections and tests to be performed upon individual items. These measures include provisions for the identification of items which have satisfactorily passed required inspections and tests when necessary to preclude inadvertent bypassing of such inspections and tests. Procedural controls to perform operations out of sequence are included in QA Volume I. These measures also include provisions for indicating nonconforming, inoperative, or malfunctioning components within a system to prevent inadvertent operation.

1.8.15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

Procedures and practices are established and documented to control materials, parts and components, or quality activities which do not conform to established requirements. To prevent the inadvertent use or installation of purchased material, parts, or components, these measures may include timely return of nonconforming materials, parts, or components to the vendor for replacement with satisfactory items. Formal nonconformance control systems are in place to assure control and disposition of nonconforming items or activities including adherence to 10CFR21 as necessary.

Maintenance request forms provide identification and control of nonconforming items requiring repair or rework to be returned to satisfactory condition. Where a safety-related component is required to be temporarily or permanently changed, such that it no longer complies with the original and approved design, such changes, with required approvals, are made via the approved modification request procedure.

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Figure 1.8-1

WISCONSIN ELECTRIC POWER COMPANY ORGANIZATION WITH QUALITY ASSURANCE INTERFACE TO POINT BEACH NUCLEAR PLANT

