UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REVISION 26 TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

NUCLEAR PROJECT NO. 2

DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated June 18, 1997, the Washington Public Power Supply System (the licensee) requested approval to make certain changes to the Operational Quality Assurance Program Description (WPPSS-QA-004) applicable to Nuclear Project No. 2. The proposed changes involve redefinition of the qualification requirements for the positions of Manager, Quality, and Supervisor, Quality Services; establishment of a Qualified Procedure Reviewer (QPR) function to reduce the burden of the Plant Operations Committee (POC) for the review and approval of programs and procedures; use of functional disciplines for POC membership rather than organizational positions; redefinition of the membership and quorum requirements for the Corporate Nuclear Safety Review Board (CNSRB); and delegation of the Plant General Manager's responsibility for approval of procedure changes to another member of management. Some of these proposed changes are generally similar to administrative control changes requested by other licensees and found acceptable by the staff.

2.0 EVALUATION

a. Qualification Requirements

The licensee proposes to redefine the minimum qualification requirements for the positions of Manager, Quality, and Supervisor, Quality Services to be more consistent with the staff's acceptance criterion given in the Standard Review Plan, NUREG-0800, Section 17.2, "Quality Assurance During the Operations Phase" (specifically, Section II.17.2.1, Item 1, which refers to Section II.17.1 (1C2)). The acceptance criterion refers to the qualification requirements given in ANSI/ANS-3.1-1978, "Selection and Training of Nuclear Power Plant Personnel," Section 4.4.5, which is endorsed by Regulatory Guide 1.8, "Qualification and Training of Personnel for Nuclear Power Plants."

Present Qualification Requirements

The present qualification requirements for the Manager, Quality and for the Supervisor, Quality Services are as follows:

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Manager, Quality

a. Education: Bachelor Degree or equivalent* in Engineering or a related science.

b. Experience: Ten (10) years experience in the field of quality assurance, or equivalent number of years of nuclear industry experience in a management position or a combination of the two. (The requirement that the manager have at least two years of experience in the administration of and adherence to the Quality Assurance Program in a significant management role directly involving nuclear power plants was deleted in the previously accepted criterion).

Supervisor, Quality Services

a. Education: Bachelor Degree or equivalent[1] in Engineering or a related science.

b. Experience: Four (4) years in the field of quality assurance, or equivalent number of years of nuclear plant experience in a supervisory position, preferably at an operating nuclear plant, or a combination of the two. At least one (1) of these four (4) years of experience shall be nuclear power plant experience in the implementation of the quality assurance program.

Proposed Qualification Requirements

The licensee proposes to modify the requirements for these two positions and establish the same qualifications for both as follows:

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[1]Equivalency will be determined based upon an evaluation of the following factors:

1. High School diploma or GED.
2. Sixty (60) semester hours of related technical education taught at the college level (900 classroom or instructor conducted hours).
3. Qualified as an NRC senior operator at the assigned plant.
4. Four (4) years of additional experience in his area of responsibility.
5. Four (4) years of supervisory or management experience.
6. Demonstrated ability to communicate clearly (verbally and in writing).
7. Certification of academic ability and knowledge by corporate management.
8. Successful completion of the Engineer-In-Training examination.
9. Professional Engineer License.
10. Associated degree in Engineering or a related science.

Equivalency to a Bachelor Degree in Engineering or a related science must be based on an appropriate combination of the above factors.

Manager, Quality or Supervisor, Quality Services

a. Education: Bachelor Degree or equivalent[1] in Engineering or a related science.

b. Experience: Six (6) years experience in the field of quality assurance, or equivalent number of years of nuclear industry experience in a supervisory/management position or a combination of the two. At least two (2) years of these six (6) years experience shall be nuclear power plant experience in the overall implementation of the quality assurance program (this experience shall be obtained within the quality assurance organization).

The licensee indicates that both positions fulfill the Quality Assurance position qualification requirements described in Section 4.4.5 of ANSI/ANS-3.1-1978 which are as follows:

> "... six (6) years of experience in the field of quality assurance, preferably at an operating nuclear plant, or operations supervisory experience. At least one (1) year of this six (6) years experience shall be nuclear power plant experience in the overall implementation of the quality assurance program. (This experience shall be obtained within the quality assurance organization.) A mininum of one (1) year of this six (6) years experience shall be related technical or academic training. A maximum of four (4) years of this six (6) years experience may be fulfilled by related technical or academic training."

Discussion

For the Manager, Quality, the new qualification requirements represent a reduction in the years of quality assurance experience, but an increase in years of experience involving nuclear power plants, relative to the prior commitment. For the Supervisor, Quality Services, the new qualification requirements represent an increase in the years of quality assurance experience as well as an increase in years experience involving nuclear power plants, relative to the prior commitment. For either position, the qualification requirements exceed those specified in ANSI/ANS-3.1-1978 (as well as ANSI/ANS-3.1-1981).

Evaluation

The staff finds the licensee's proposed qualification requirements for the two cited positions to be acceptable since the minimum staff acceptance criterion, as identified in the Standard Review Plan, will continue to be met.

b. Review and Approval of Programs and Procedures

The licensee proposes to modify the present mode of operation of the POC by creating a new position of Qualified Procedure Reviewer (QPR) whose function is to perform the review of certain programs and procedures required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, in lieu of the review previously performed by the POC. The proposed modification is also applicable to temporary changes to procedures of Technical Specification 5.4.1a. through e.

Present Mode of Operation

Under the present mode of operation, the POC is responsible for reviewing all programs and procedures, and changes thereto, with regard to their impact on plant safety. No distinction is made with respect to the need for a safety evaluation in accordance with 10 CFR 50.59. Recommendations regarding their acceptability are forwarded to the Plant General Manager for a final decision.

Proposed Mode of Operation

For those programs and procedures, and changes thereto, that require a safety evaluation in accordance with 10 CFR 50.59, the POC will continue to perform its review for acceptability as before, with final approval by a responsible member of management as assigned by the Plant General Manager. For those programs and procedures that do not require a safety evaluation, the QPR will perform the review with final approval obtained from the procedure sponsor prior to implementation. The new process for program and procedure review and approval will be documented in and controlled by administrative procedures.

Discussion

The QPR will be an individual knowledgeable in the functional area affected, but may not be the individual who prepared the program or procedure, or change thereto. The QPR will assure that any necessary cross-disciplinary reviews are conducted prior to final approval. The qualifications of the QPR shall meet or exceed those given in ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," for positions in Section 4. QPRs whose positions are described in Sections 4.3.2 and 4.5 of the standard must be qualified for other positions as described in Section 4. These requirements meet or exceed the qualification requirements of the POC members who conform to ANSI/ANS-3.1-1981, "Selection, Qualification and Training of Personnel for Nuclear Power Plants," Section 4.7.

Each program and procedure will be reviewed by a minimum of two technical reviewers - the procedure sponsor and the QPR, both of whom are knowledgeable in the affected functional area. These reviewers shall assure the conduct of cross-disciplinary reviews as necessary. Each program and procedure shall be reviewed by a Licensing Basis Impact Determination (LBID) preparer and reviewer to determine the need for a safety evaluation relative to the requirements of 10 CFR 50.59. For those programs and procedures, or changes thereto, that do not require a 10 CFR 50.59 safety evaluation, a final review is conducted by the QPR with final approval by the procedure sponsor. The procedure sponsor is also required to determine that the intent of the previously approved program or procedure has not changed. Review by the POC is not required.

For those changes requiring a 10 CFR 50.59 safety evaluation, final review is performed by the POC with final approval by the appropriate member of management as determined by the Plant General Manager (PGM). Changes to the Process Control Program and the Offsite Dose Calculation Manual remain as requirements for POC review and acceptance by the Plant General Manager prior to implementation, whether or not a safety evaluation is necessary. The licensee also proposes that the Plant General Manager be permitted to assign an appropriate

member of management to approve procedure changes for those changes that do not require a 10 CFR 50.59 safety evaluation.

Temporary procedure changes will also be processed in an identical fashion, i.e., those involving the need for a 10 CFR 50.59 safety evaluation will require POC consideration and those with no need for such an evaluation will be reviewed by the QPR. In addition, a supervisor in charge of the shift must also approve a temporary procedure change if the change does not involve a change in the intent of the previously approved procedure. The procedure for the review and approval of temporary changes is intended to meet the requirements of ANSI/ANS-3.2-1976, Section 5.2.2, "Procedure Adherence."

Evaluation

Based on the continued responsibility of the POC to review program and procedure changes for which safety evaluations are necessary in accordance with the 10 CFR 50.59, and on the qualification requirements for the QPR position, the staff has determined that the licensee's proposed modification of the POC's responsibilities for the review of programs and procedures, and changes thereto, is acceptable. Further, a similar administrative change has been found acceptable for a number of other licensees. With regard to the delegation of the Plant General Manager's responsibility for approval of procedure changes to another member of management, this is also acceptable providing that appropriate procedural controls are established to assure that plant safety is not compromised. The following controls should be established to govern the process:

- The PGM should appoint the individual to whom signature authority is granted;
- The assigned individual should be knowledgeable in the technical and functional area of the procedure change;
- The assigned individual should not be the preparer of the procedure change;
- The PGM should be kept fully informed regarding the safety implications of the procedural changes to be authorized prior to their implementation;
- The individual to whom signature authority is granted should possess minimum technical, educational and experience qualifications equivalent to the PGM as specified in ANSI/ANS-3.1-1978, Section 4.2.1, as demonstrated by appropriate certification; and
- The administrative control of the delegated signature authority, including the above criteria, should be documented in a procedure approved by the PGM.

In the letter dated November 24, 1997, the licensee indicated that the controls that will govern the delegation of signature authority for procedural changes will be placed in a site wide procedure which is approved by the Chief Nuclear Officer and the PGM. This acceptable to the NRC.

c. Composition of the POC

The licensee proposes to revise the present method for the selection of members for the POC.

Present Method

The POC is presently composed of the following membership:

Chairman:	Plant General Manager
Vice Chairman:	As designated from the POC members by the Plant General Manager and documented in the POC minutes.
Member:	Operations Manager
Member:	Health Physics Operations General Supervisor/RPM
Member:	System Engineering/Technical Services Division Manager
Member:	Maintenance Manager
Member:	Administrative Manager
Member:	Quality Services Supervisor
Member:	Engineering Programs Manager

Proposed Method

The licensee proposes to modify the composition of the POC by designating representation by functional areas rather than by organizational positions. The functional areas would remain consistent with the previous organizational positions and include the following:

Operations	Radiation Protection
Maintenance	Technical Services
Engineering	Chemistry
Quality	Planning/Scheduling/Outage
Administrative Services	

Discussion

Under the licensee's proposal, the Plant General Manager would appoint a Vice Chairman and the individual members with the necessary experience in the designated functional areas. The qualifications of all members of the POC and alternates will continue to meet the minimum requirements of ANSI/ANS-3.1-1981 which meets the current requirement in Technical Specification 5.3.1.

Evaluation

The staff finds the licensee's proposal for modification of the POC composition to be acceptable since the qualifications of the members will not be degraded. Further, the licensee's proposal is consistent with similar changes made by other licensees that have been accepted by the staff.

d. Corporate Nuclear Safety Review Board (CNSRB)

The licensee proposes to revise the membership and quorum requirements of the CNSRB.

Present Requirements

The CNSRB is composed of nine members with cumulative expertise in the following disciplines:

a. Nuclear power plant operations
b. Nuclear engineering
c. Chemistry and radiochemistry
d. Metallurgy
e. Instrumentation and control
f. Radiological safety
g. Mechanical and electrical engineering
h. Quality assurance practices

Quorum requirements include the Chairman or an alternate Chairman and at least four (4) CNSRB members or alternates. No more than a minority of the quorum shall have line responsibility for operation of the nuclear plant. The distribution of CNSRB meeting records will performed within 14 days following each meeting.

Proposed Requirements

The licensee proposes to modify the membership and quorum requirements of the CNSRB to at least nine members and no more than twelve, and the quorum to no less than half of the membership including a Chairman and duly appointed alternates. Further, the distribution of CNSRB records is proposed to be made within 15 working days.

Evaluation

The staff has determined that the licensee proposals are acceptable and the OQAPD continues to satisfy the requirements of 10 CFR Part 50, Appendix B.

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Date: December 30, 1998