REVISION 4
Draft 4

OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION

(WPPSS-QA-004)

APPROVED: _____ _____
Director, Quality Assurance — Date

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WPPSS

Washington Public Power Supply System
Richland, Washington 99352

MANAGEMENT STATEMENT

It is the policy of Washington Public Power Supply System (hereinafter called the "Supply System") to design, construct and operate its nuclear power plants without jeopardy to the health and safety of the public. In support of this policy, the Supply System has established a Corporate Quality Assurance Program that is described in the following three documents:

1. Quality Assurance Program for Design and Construction.

2. ASME Quality Assurance Manual (Design and Construction).

3. Operational Quality Assurance Program Description (Operations Phase).

The three documents contain the official Supply System Quality Assurance policies. Adherence by all affected Supply System organizations is mandatory.

The Operational Quality Assurance Program Description meets the applicable requirements of 10 CFR 50, Appendix B and shall be implemented by written and approved procedures and/or instructions.

The Quality Assurance Directorate is mandated the responsibility and authority for establishing, administering and assuring implementation of the Supply System Corporate Quality Assurance Program. The Quality Assurance Director has the responsibility and authority, including stop work authority, to perform actions necessary to accomplish this mandate as delineated in the Corporate Quality Assurance Program manuals.

The Quality Assurance Director has my delegated approval authority for the Operational Quality Assurance Program Description and any necessary modifications.

_____
R. L. Ferguson,
Managing Director

Date: _____

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1 ORGANIZATION

1.1 PURPOSE

This section provides a description of the organizational structure, responsibilities, and lines of communication for the development, implementation, and verification of Supply System's Operational QA Program, hereafter referred to as QA Program, for its nuclear power plants.

1.2 GENERAL

The Supply System organization responsible for establishing, executing, and measuring the overall effectiveness of the administrative controls and the QA Program for its nuclear power plants is as depicted in Figures 1-1 through 1-5. Portions of these activities may be delegated to external organizations qualified to the requirements of the QA Program, however, the responsibility shall remain with the Supply System.

1.3 MANAGEMENT RESPONSIBILITIES

1.3.1 The Managing Director/Deputy Managing Director is responsible for the establishment of policies and for overall management of Supply System operations. The Managing Director has issued a

"Management Statement" which commits Supply System to design, construct, and operate its nuclear power plants without jeopardy to the health and safety of the public. The Managing Director is the ultimate Supply System authority on matters involving quality. The Managing Director/Deputy Managing Director operates through the Director, Quality Assurance, the Director, Nuclear Safety, the Director, Power Generation, and the Program Directors (Projects) to provide for all Quality Assurance/Quality Control functions during initial testing (pre-operational and startup testing) and subsequent operations phase activites for all Supply System's nuclear facilities. The Managing Director/Deputy Managing Director arranges through the Technical Director and the Executive Director for support services to all Supply System nuclear facilities in such areas as engineering, fuel management, purchasing, health physics, and records management.

1.3.2 The Director, Quality Assurance, reports to the Managing Director/Deputy Managing Director, and is responsible for establishing, administering, and assuring implementation of the Supply System Corporate Quality Assurance Program during the design, construction, and operation phases. To accomplish this role, the Director, Quality Assurance, operates through the Manager, Operational QA & Services, the Manager, Vendors/Audits, and the Manager, Quality Engineering and Systems. The qualification requirements for the position of Director, Quality Assurance are as described in Appendix I, "Qualification Requirements."

1.3.2.1 The Manager, Operational QA & Services, reports to the Director, Quality Assurance, and is responsible for monitoring and performing surveillances of activities performed under the responsibility of Home-Office-located Supply System organizations. Subsequent to the issuance of Operating License, the Manager, Operational QA & Services, is also responsible for monitoring and performing surveillances of activities performed under the responsibility of Plant Managers and Startup Managers. Some of the specific responsibilities of the Manager, Operational QA & Services, include:

a. Development and maintenance of the QA Program.

b. Establishment and conduct of an independent QA surveillance program over in-plant and Home Office activities performed by Supply System organizations (other than Engineering Division) and vendors.

c. Providing Operational Quality Assurance input to the training and indoctrination program for personnel performing activities that affect safety-related functions of plant items.

d. Interfacing between the plants and other Supply System organizations to establish coordinated Quality Assurance support.

e. Reporting plant-related quality problems to appropriate management levels to expedite corrective action.

f. Providing assistance to other Supply System organizations in QA matters.

g. Periodic review of reports of surveillances, audits, and plant-related non-conformances to identify any quality trends which may constitute a need for corrective action in order to preclude repetition of non-conformances, and for notifying the responsible Supply System organizations the significant results of such reviews for accomplishment of corrective action.

h. Reviewing procurement documents, procedures, and instructions for assuring inclusion of appropriate quality requirements.

1.3.2.1.1 The Operations QA Supervisor for each nuclear power plant is located on-site and reports to the Manager, Operational QA & Services, subsequent to the issuance of Operating License. Prior to Operating License, the Operations QA Supervisor reports to the Project QA Manager, who also is located on-site. The Operations QA Supervisor assures implementation of QA Surveillance program over activities performed under the responsibility of the Plant Manager and the Startup Manager and is responsible for reviewing plant-originated procurement documents, modification packages, inspection plans,

reports of non-conformances, procedures, and instructions. The Operations QA Supervisor has direct communication access to the Plant Manager, the Startup Manager, and other plant supervisory staff and has the authority to issue a stop work order, when the activity being performed appears not to comply with the applicable provisions of the QA Program and implementing procedures. When the unit is operating, the Operations QA Supervisor may recommend to the Plant Manager that the unit be shutdown. The Plant Manager, however, has the final responsibility for the overall evaluation of all aspects and implications of shutting down the operating unit.

1.3.2.2 The Manager, Vendors/Audits, reports to the Director, Quality Assurance, and is responsible for the implementation of an independent audit program over activities performed by Supply System organizations and its vendors. The Manager, Vendors/Audits, is specifically responsible for:

a. Planning, coordinating, and performing surveillances over off-plant activities performed by vendors.

b. Developing and maintaining an evaluated vendors list.

c. Performing preaward surveys/evaluations of vendors.

d. Qualification/certification of audit personnel.

e. Planning, scheduling, and performing audits of activities performed by Supply System organizations and its vendors; identifying QA Program non-conformances and, if appropriate, recommending solutions; evaluating corrective actions; and verifying correction of identified nonconformances.

1.3.2.3 The Manager, Quality Engineering & Systems, reports to the Director, Quality Assurance, and is responsible for providing centralized support to the Supply System nuclear facilities and other Supply System organizations in QA-related areas. The Manager, Quality Engineering and Systems, is specifically responsible for:

a. Developing, interpreting, and communicating QA requirements for the design and construction phase activities at Supply System nuclear facilities.

b. Development and maintenance of the Quality Assurance Program for Design and Construction and the ASME Quality Assurance Manual.

c. Reviewing procedures/instructions related to the Engineering Division activities.

d. Interfacing with and performing surveillances of Engineering Division activities.

e. Qualification/Certification of Supply System personnel who are required to be qualified/certified in accordance with SNT-TC-1A and its Supplements.

f. Interfacing with the Authorized Nuclear Inspector (ANI), Authorized Inspection Agency, and the Enforcement Authority and keeping the ANI informed of progress of the work at Supply System projects.

1.3.3 The Director, Nuclear Safety reports to the Managing Director/Deputy Managing Director and is responsible for development of corporate nuclear safety policy and standards and for independent nuclear safety evaluation of each of the Supply System nuclear projects. The Director, Nuclear Safety, is responsible for establishing a means for all formal contacts with the Nuclear Regulatory Commission on nuclear safety issues pertaining to licensing of each of the nuclear projects and is also responsible for providing safety and licensing expertise in support of the nuclear projects. The Director, Nuclear Safety, is Chairman of the Safety Review Board which functions to provide an independent nuclear safety review of activities in accordance with the Technical Specifications for the applicable nuclear power plant.

1.3.4 The Director, Power Generation, reports to the Managing Director/Deputy Managing Director, and is responsible for:

a. Safe and efficient operation of Supply System's nuclear power plants subsequent to commercial operation.

b. Establishment and monitoring of maintenance systems common to all nuclear power plants.

c. Training of Power Generation staff.

d. Development of corporate programs and procedures for power generation and providing the same to the Program Directors on each project to ensure uniform application.

To accomplish this role, the Director, Power Generation, operates through the Plant Managers and the Power Generation Services Manager.

1.3.4.1 The Plant Manager for each of the Supply System nuclear power plants reports to the respective project Program Director during the period prior-to-commercial operations. Thereafter, the Plant Manager reports to the Director, Power Generation. Prior-to-commercial operation, the Plant Manager has direct communication access to the Director, Power Generation, in order to facilitate coordinated development and uniform application of administrative controls and operational philosophies.

The Plant Manager is directly responsible for safe and efficient operation of the plant in accordance with the Operating License, requirements of the Plant Technical Specifications, and the Plant Procedures Manual. Some of the specific responsibilities of the Plant Manager are:

a. Planning, coordinating, and directing all test, operation, maintenance, and refueling activities subsequent to the issuance of Operating License.

b. Authorizing all plant modifications after the issuance of Operating License.

c. Approval and control of procurement documents for safety-related items and services.

d. Controlling purchased equipment and materials intended for plant use.

e. Establishment and implementation of a calibration program for Measuring & Test Equipment (including installed instruments covered by the Plant Technical Specifications).

f. Dispositioning of nonconforming items.

g. Control and maintenance of on-site quality assurance records.

The Plant Manager operates through the Operations Superintendent, the Maintenance Superintendent, the Technical Superintendent, the Training Supervisor, and the Administrative Supervisor. Reporting to the Technical Superintendent is a Quality Control (QC) Supervisor. The QC Supervisor, assisted by the QC Inspectors, is responsible for the performance of all required QC inspections as identified in the plant procedures. The plant organization (see Figure 1-2) and the functional responsibilities of key plant personnel are as described in Chapter 13 of the Final Safety Analysis Report for the applicable nuclear power plant.

1.3.4.2 The Manager, Power Generation Services, reports to the Director, Power Generation, and is reponsible for providing support services to the Plant Managers in such areas as operation, maintenance, and training. The Manager, Power Generation Services, is also responsible for developing the corporate programs and procedures that are common to all nuclear plants, and providing the same to the Program Directors (Projects) for application to plant activities.

1.3.5 The Technical Director reports to the Managing Director/Deputy Managing Director and is responsible for providing nuclear power plants the technical support in such areas as engineering, nuclear fuel management, environmental programs, etc. To accomplish this role, the Technical Director operates through the Manager, Technical Division, and the Manager, Engineering Division.

1.3.5.1 The Manager, Technical Division reports to the Technical Director. The authorities and responsibilities of the Manager, Technical Division, are described in Chapter 13 of the Final Safety Analysis Report for the applicable nuclear power plant.

1.3.5.2 The Manager, Engineering Division reports to the Technical Director and is responsible for providing support services to the Plant Managers in the following areas:

a. Preparation, review, and approval of design documents pertaining to new designs and changes to approved designs that are necessitated as a result of authorized plant modifications.

b. Control, maintenance, and distribution of a listing (including documents referenced therein) of safety-related structures, systems, and components for each nuclear power plant.

c. Traditional and specific engineering functions as described in Chapter 13 of the Final Safety Analysis Report for the applicable nuclear power plant.

1.3.6 The Program Director for each of the Supply System nuclear projects reports to the Managing Director/Deputy Managing Director and is responsible for all plant activities prior-to-commercial operation. To accomplish this role, the Program Director for Supply System

Project WNP-1/4 operates through the Project QA & Safety Manager and the Plant Manager (see Figure 1-3); the WNP-2 Program Director operates through the Project QA Manager, the Project Manager, and the Plant Manager (see Figure 1-4); and the WNP-3/5 Program Director operates through the Project QA Manager and the Plant Manager (see Figure 1-5).

1.3.6.1 The WNP-1/4 Project QA & Safety Manager reports to the WNP-1/4 Program Director and has direct communication access to the Director of Quality Assurance in order to seek resolution of quality problems which cannot be resolved at the project level or which require corporate level corrective action. The WNP-1/4 Project QA & Safety Manager is responsible for:

a. Verification of the implementation of the Corporate Quality Assurance Program at the project level, and

b. Development and implementation of the project safety program.

To accomplish this role the WNP-1/4 Project QA & Safety Manager operates through the Project QA Manager and the Project Health & Safety Manager.

1.3.6.2 The Project QA Manager for WNP-1/4 reports to the WNP-1/4 Project QA & Safety Manager, and the Project QA Managers for WNP-2 and WNP-3/5 report to the respective Program Directors. The Project QA Managers for WNP-2 and WNP-3/5 have direct communication access to the Director of Quality Assurance in order to seek resolution of quality problems which cannot be resolved at the project level or which require corporate level corrective action. Each Project QA Manager is principally responsible for assuring implementation of the Corporate Quality Assurance Program, at the project level, during the design, construction, and prior-to-Operating License pre-operational testing activities. Each Project QA Manager is responsible for the performance of only QA-related functions and is free from any responsibilities that involve project cost and scheduling considerations. Specific responsibilities of each Project QA Manager include:

a. Performing audits of construction activities at the project.

b. Performing surveillances over site contractor's activities.

c. Review of non-conformance reports and initiating management corrective action reports, where necessary.

d. Exercising Stop Work authority for quality reasons.

e. Providing QA coverage, through the *Operations QA supervisor, over activities that are performed under the responsibilities of the Plant Manager and the Startup Manager.

*The specific responsibilities of the Operations QA Supervisor, who reports to the Manager, Operational QA & Services, subsequent to the issuance of Operating License, are as described in Section 1.3.2.1.1.

1.3.6.3 The Health & Safety Manager for WNP-1/4 reports to the WNP-1/4 Project QA & Safety Manager and is responsible for the development and implementation of a safety program for WNP-1/4.

1.3.6.4 The Project Managers for WNP-2 and WNP-3/5 report to the respective Program Directors and are responsible for accomplishing the prior-to-Operating License pre-operational testing activities. The WNP-2 Project Manager accomplishes this role by providing administrative and functional direction to the WNP-2 Startup Manager. The WNP-3/5 Project Manager accomplishes this role through the WNP-3/5 Deputy Project Manager.

1.3.6.5 The Deputy Project Manager for WNP-3/5 reports to the WNP-3/5 Project Manager and is responsible for accomplishing prior-to-Operating License pre-operational testing activities by providing functional directions to the WNP-3/5 Startup Manager.

1.3.6.6 The Startup Manager for each of the Supply System nuclear projects is responsible for the performance of initial testing activities at that project. During the prior-to-Operating License period, the WNP-1/4 Startup Manager receives functional and administrative direction from the WNP-1/4 Plant Manager (Assistant Program Director for Operations), the WNP-2 Startup Manager receives functional and administrative direction from the WNP-2 Project Manager, and the WNP-3/5 Startup Manager receives functional direction from the WNP-3/5 Deputy Project Manager and administrative direction from the WNP-3/5 Plant Manager. Subsequent to the issuance of Operating License, the Startup Manager for each project functionally and administratively reports to the applicable Plant Manager. The duties and responsibilities of the Startup Manager are as described in Chapter 14 of the Final Safety Analysis Report for the applicable nuclear power plant.

1.3.7 The Executive Director reports to the Managing Director and is responsible for providing to nuclear power plants the support services in such areas as control and maintenance of off-site QA records, health physics, emergency response plans, industrial safety/fire protection, security, etc. To accomplish this role, the Executive Director operates through the Director, Contracts and Materials Management, and the Director, Administrative Services.

1.3.7.1 The Director, Contracts & Materials Management reports to the Executive Director and is responsible for providing support services to:

a. Supply System nuclear facilities for procurement and control of materials, equipment, and services.

b. .echnical Division for procurement of nuclear fuel.

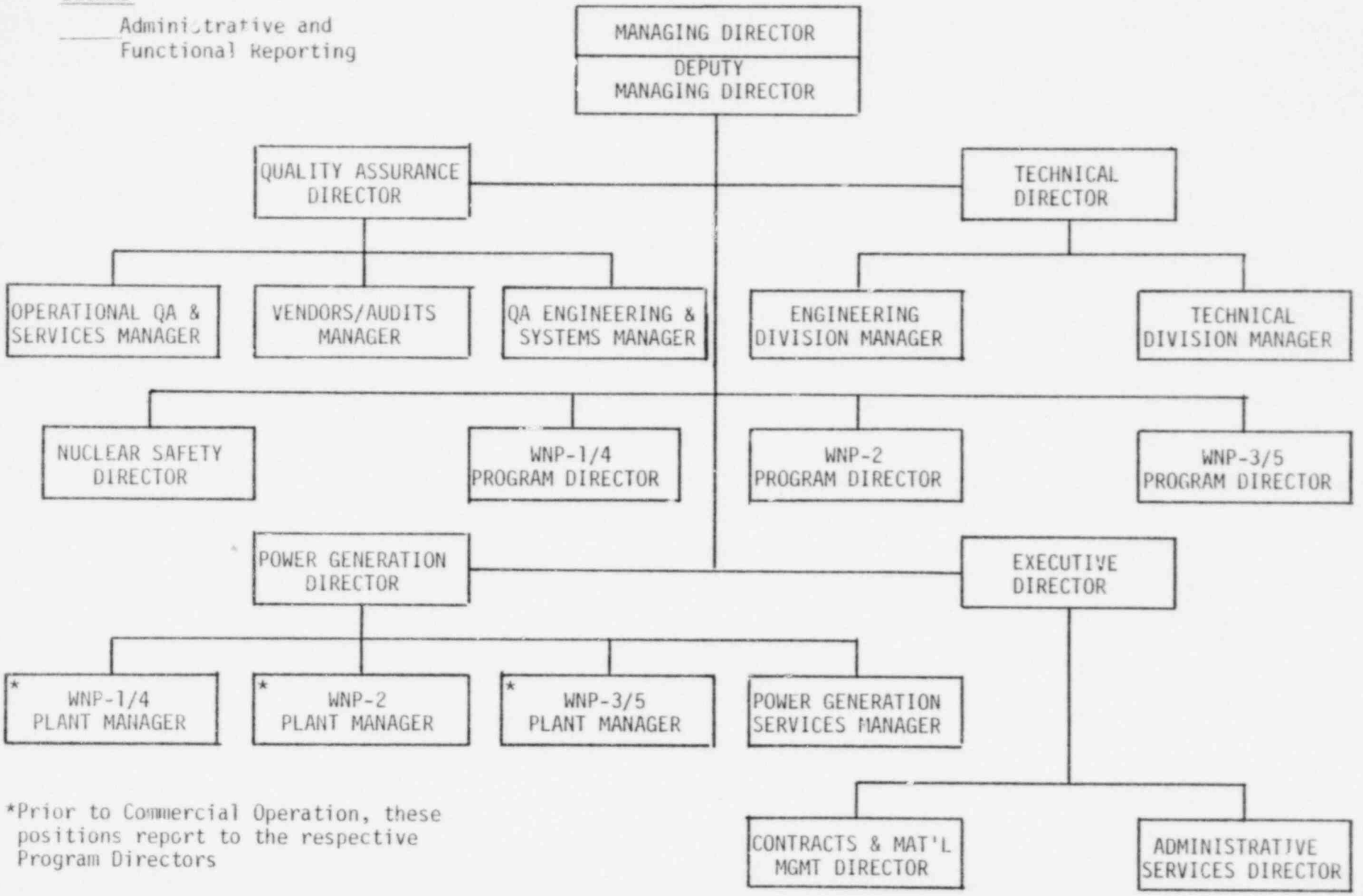
1.3.7.2 The Director, Administrative Services reports to the Executive Director and is responsible for providing support services to the Plant Managers and heads of other Supply System organizations in the following areas:

a. Control and maintenance of corporate records.

b. Distribution of corporate level policies and procedures.

c. Development of policy and programs for health physics, emergency preparedness and response, industrial safety/fire protection, security, and associated training programs.

SUPPLY SYSTEM ORGANIZATION



*Prior to Commercial Operation, these positions report to the respective Program Directors

FIGURE 1-1

TYPICAL PLANT ORGANIZATION
(At Commercial Operation)

LEGEND

Administrative and Functional Reporting

Lines of Communication

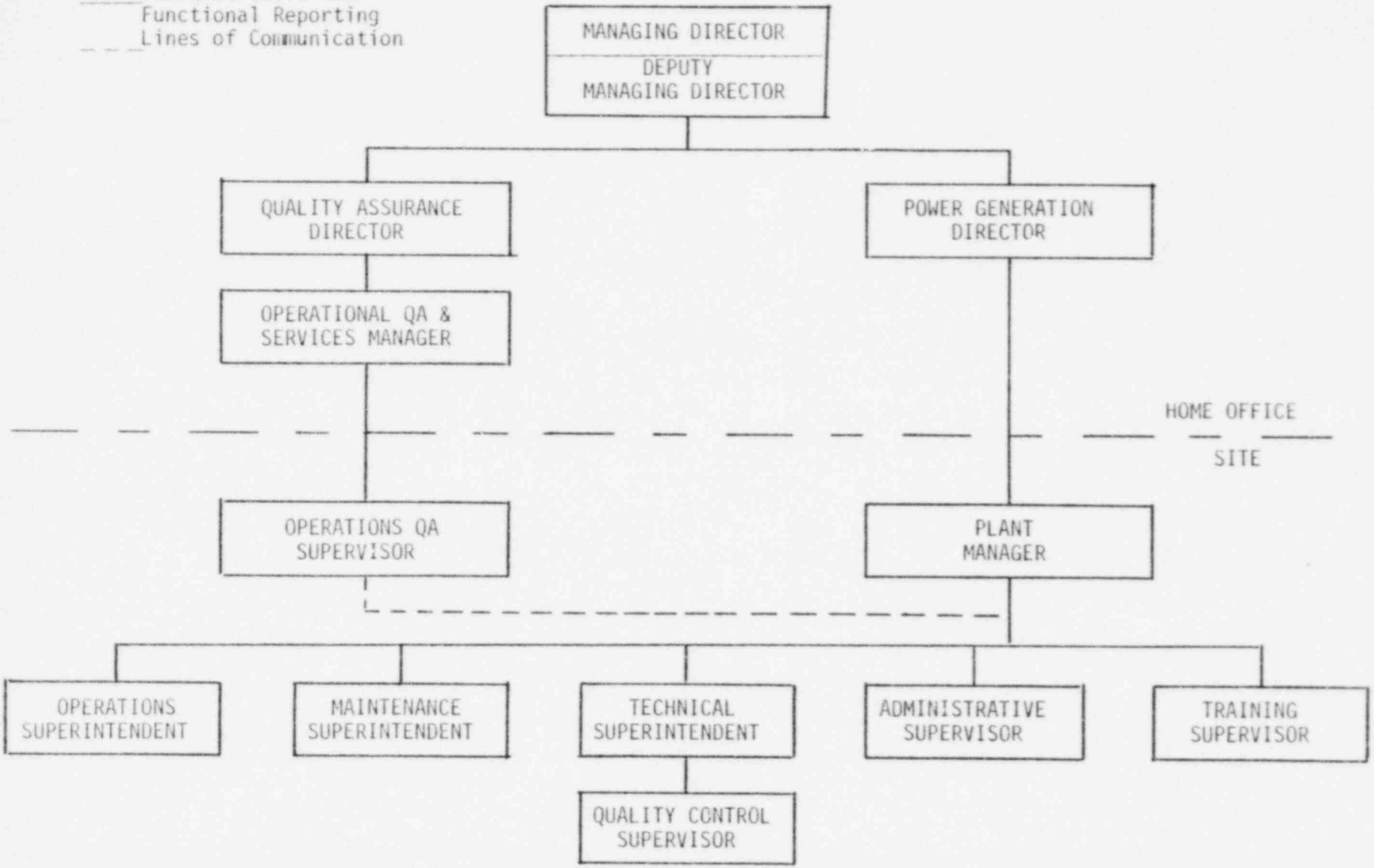


FIGURE 1-2

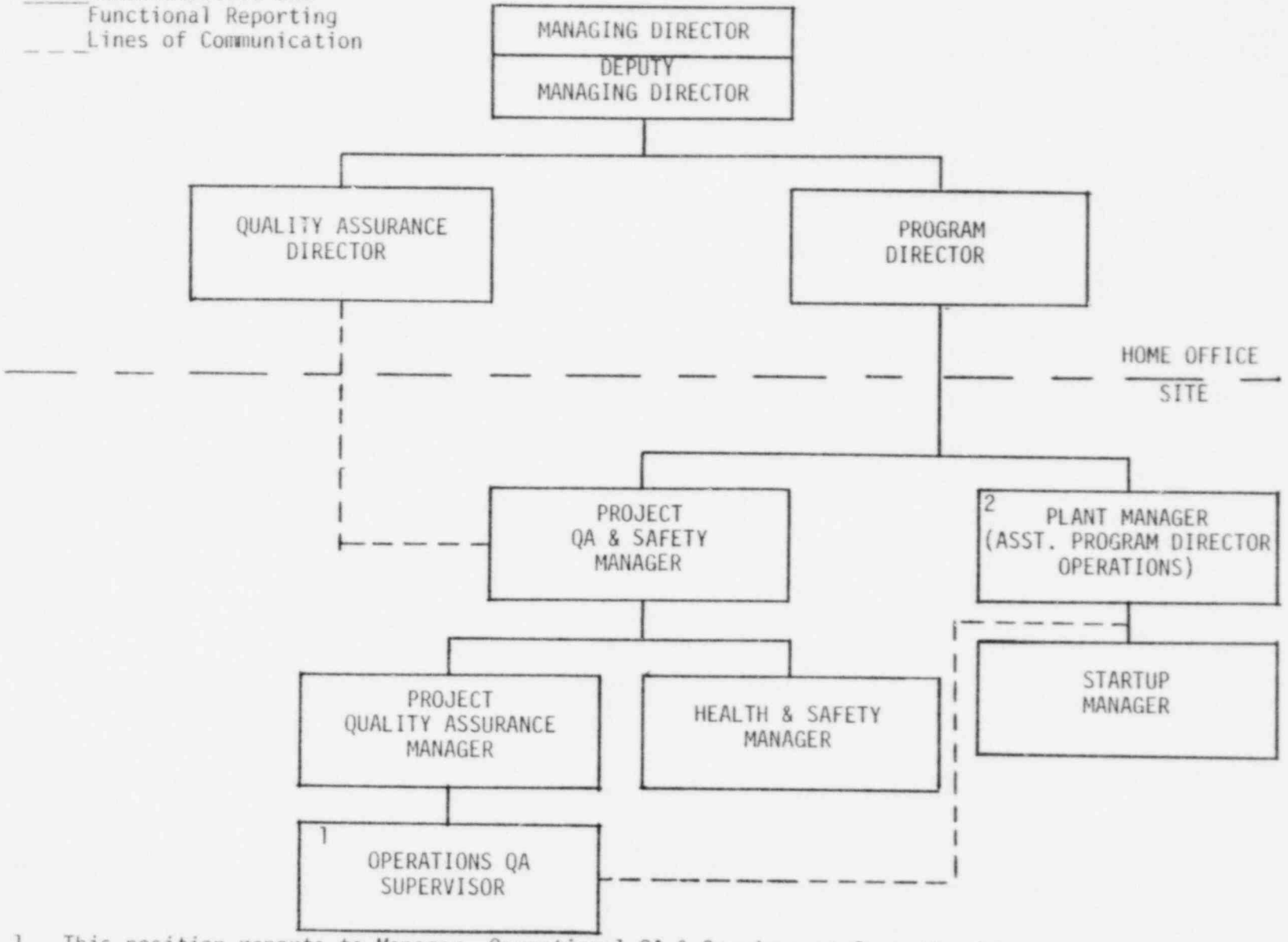
WP-115 R3

WNP-1/4 ORGANIZATION
(Prior to Operating License)

LEGEND

Administrative and Functional Reporting

Lines of Communication

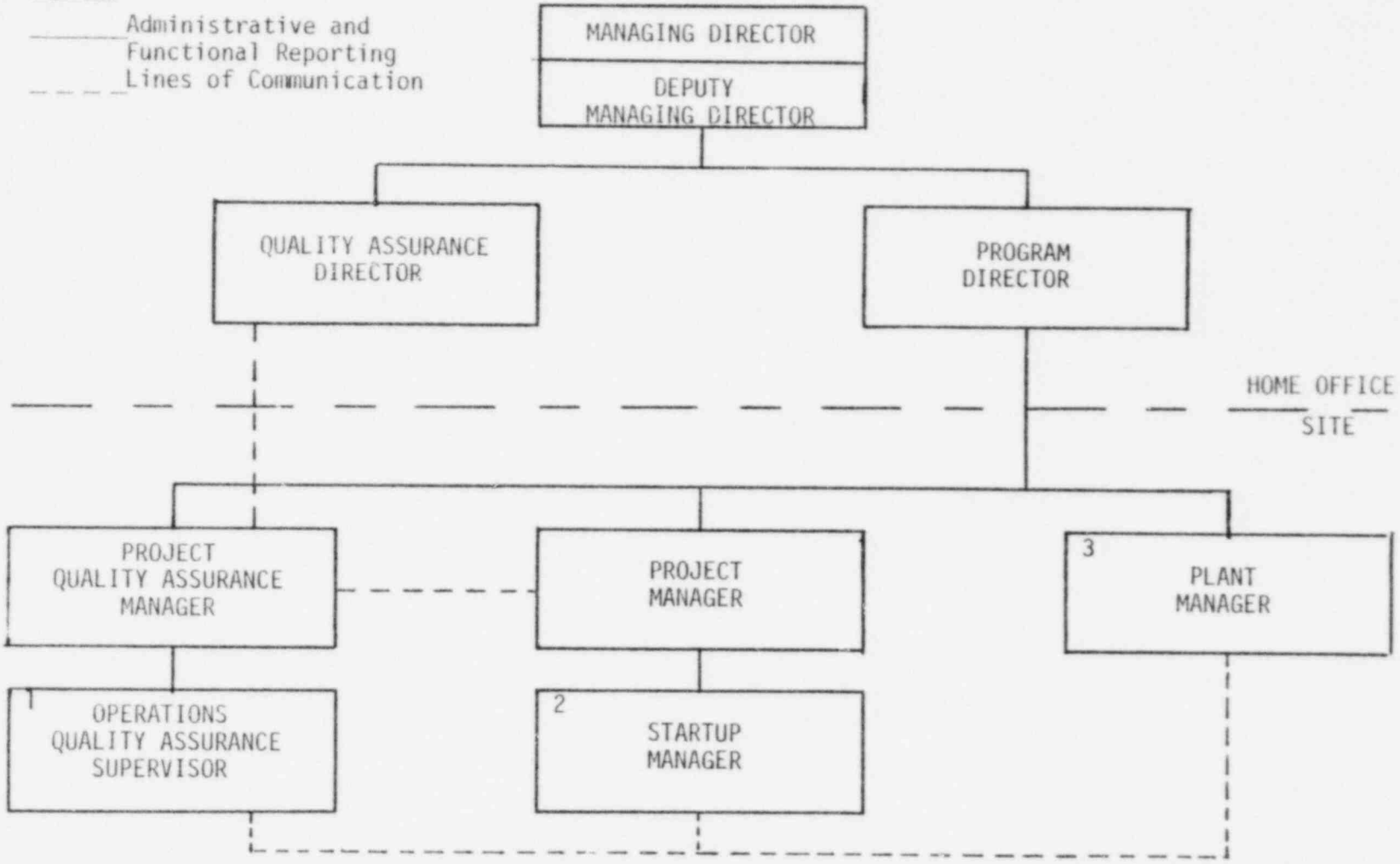


1. This position reports to Manager, Operational QA & Services at Operating License.
2. This position reports to Director, Power Generation, at Commercial Operation.

FIGURE 1-3

WP115 R3

WNP-2 ORGANIZATION
(Prior to Operating License)



1. This position reports to Manager, Operational QA & Services, at Operating License.
2. This position reports to Plant Manager, at Operating License.
3. This position reports to Director, Power Generation, at Commercial Operation.

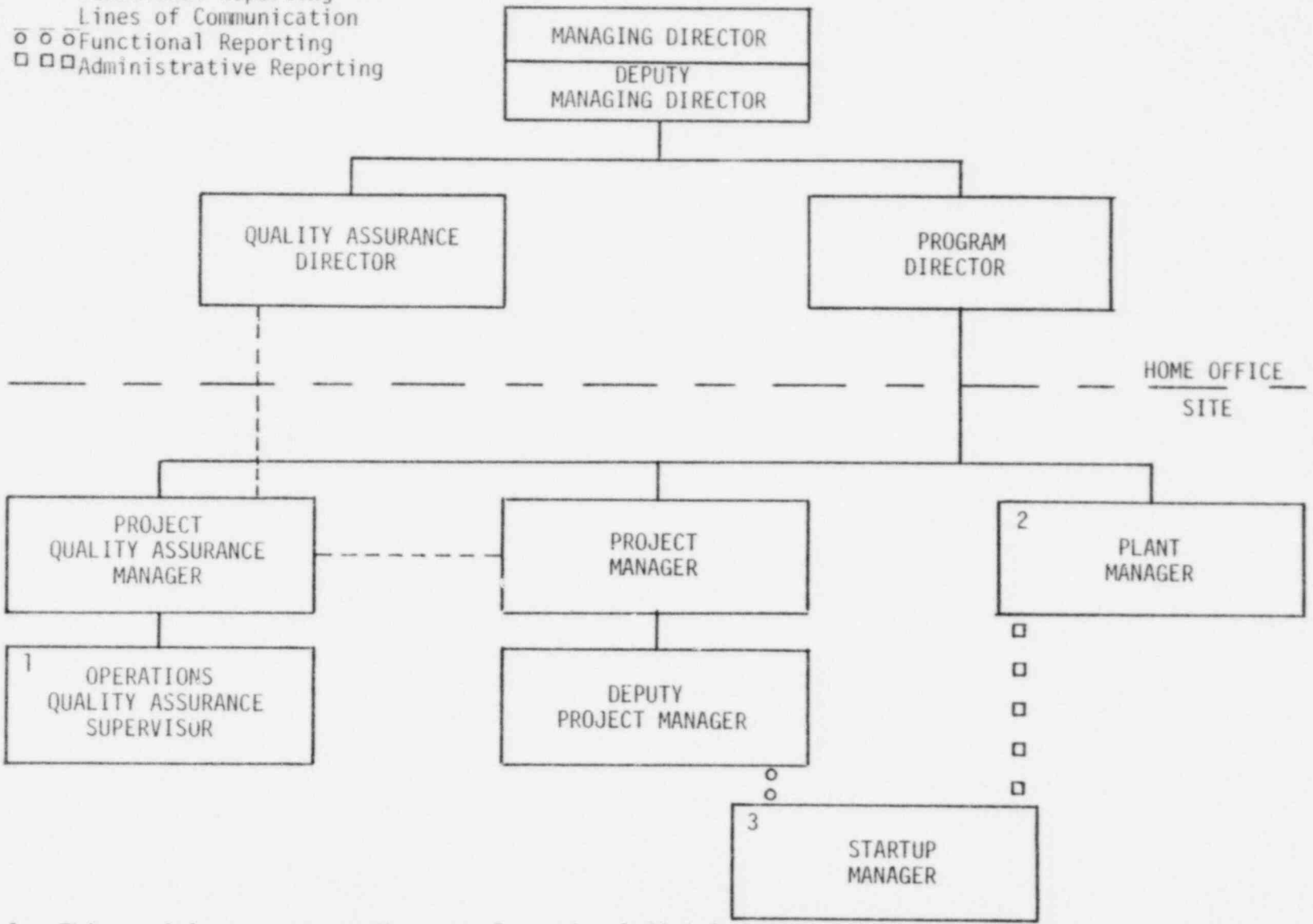
FIGURE 1-4

WP115 R3

WNP-3/5 ORGANIZATION
(Prior to Operating License)

LEGEND

- Administrative and Functional Reporting Lines of Communication
- o o o Functional Reporting
- □ □ □ Administrative Reporting



1. This position reports to Manager, Operational QA & Services, at Operating License.
2. This position reports to Director, Power Generation, at Commercial Operation.
3. This position functionally and administratively reports to Plant Manager, at Operating License.

FIGURE 1-5

2 - QUALITY ASSURANCE PROGRAM

2.1 PURPOSE

This section provides an overall description of the QA Program that will be applied to initial testing and subsequent operation and maintenance activities throughout the life of Supply System's nuclear power plants.

2.2 GENERAL

2.2.1 The QA Program and its implementing procedures and/or instructions are or will be structured to comply with the provisions of QA-related Regulatory Guides as identified and modified in Appendix II, "Position Statements". A matrix of implementing procedures/instructions cross referenced against each criterion of Appendix B to 10CFR50 will be included in this section not later than ninety (90) days prior to the then-current schedule for initial fuel loading.

2.2.2 A listing of safety-related items that will be subject to the applicable controls of the QA Program is included in the Final Safety Analysis Report (FSAR) for the Supply System's applicable nuclear power plant. Measures shall be established and implemented to control the maintenance and distribution of this listing (including drawings referenced therein) per Section 6.

2.2.3 Applicable provisions of the QA Program shall be implemented by the earliest of the following and shall remain in effect for the life of Supply System's nuclear power plants:

a. Prior to inception of the activity.

b. At the time of temporary/permanent transfer of system/component custody to Supply System.

c. Ninety (90) days prior to the then-current schedule for initial fuel loading.

2.2.4 Revisions to the QA Program will be made, as needed, by the corporate Quality Assurance. The Nuclear Regulatory Commission will be notified of a) programmatic changes (except for those that are editorial in nature) for review prior to implementation of these changes, and b) organizational changes of substantial nature within thirty (30) days after announcement.

2.2.5 Managers of Supply System organizations responsible for implementing the applicable provisions of the QA Program shall assure that activities that affect safety-related functions of plant items are performed by personnel who have been indoctrinated and trained. The scope, objective, and method of implementing the indoctrination and training program shall be documented. Proficiency of personnel performing activities that affect safety-related functions of plant items shall be maintained by retraining, re-examination, and/or recertifying, as applicable. Methods shall be provided for documenting training.

2.2.6 The scope, implementation, and effectiveness of the QA Program is routinely audited by the corporate Quality Assurance. Copies of audit reports are presented to Supply System management to provide for assessment of the effectiveness of the QA Program. Additionally, on an annual basis, the Supply System management arranges for an independent audit and evaluation of the adequacy of the scope, implementation, and effectiveness of the QA Program. This is accomplished by knowledgeable personnel outside of corporate Quality Assurance to assure achievement of an objective program assessment. Results of these independent audits are reported to the Managing Director/Deputy Managing Director.

3 - DESIGN CONTROL

3.1 PURPOSE

This section sets forth requirements for the control of new designs, changes thereto, and plant modifications that affect safety-related functions of structures, systems, and components.

3.2 GENERAL

3.2.1 Organizations (both internal and external) participating in the preparation, review, approval, and verification of design documents (drawings, design input and criteria, specifications, design analysis, computer programs, system descriptions, procedures, and instructions) associated with new designs, changes thereto, and plant modifications shall develop and implement procedures that clearly delineate actions to be accomplished. These procedures shall contain provisions to assure that:

a. Applicable regulatory requirements and design bases specified in the Final Safety Analysis Report are correctly translated into design documents.

b. Appropriate quality standards are specified and included in design documents and that changes from such standards are documented, approved, and controlled.

c. Design analysis (reactor physics, stress, thermal, hydraulic, accident, etc.) is performed, where applicable.

d. Items such as compatibility of materials, parts, components, and processes selected; accessibility for inservice inspection, maintenance, and repair; and delineation of acceptance criteria for inspections and tests are considered, where applicable, during the design development and review phases.

e. Errors and deficiencies discovered in approved design documents that could adversely affect safety-related structures, systems, and components are documented and that appropriate corrective action is taken.

f. Development, maintenance and use of computer code programs is controlled. Where the use of a particular computer code for performing design calculations is specified, such computer code is verified and certified for use.

3.2.2 Where two or more design organizations are involved in the performance of design, necessary interface controls (both internal and external) shall be documented and controlled between the participating organizations, particularly in the area of review, approval, release, distribution and revision of interface documents.

3.2.3 Design verification, to provide assurance that the design meets the specified design inputs, shall be performed by utilizing methods such as design reviews, alternate calculations, or qualification testing.

3.2.4 Design verification procedures shall be established and implemented. These procedures shall:

a. Provide for the determination of the method for design verification that will be utilized.

b. Provide assurance that the design verification is performed and documented by personnel other than those who performed the original design, but who may be from the same organization.

c. Identify the responsibilities of the verifier; areas, features, and pertinent considerations to be verified; and the documentation to be generated.

d. Require that where verification method is only by test, the prototype, component, or feature testing is performed at the earliest practicable stage.

e. Require the accomplishment of design verification, in all cases, prior to relying upon the item to perform its safety function.

3.2.5 Design documents shall be reviewed for adequacy by the originating organization unless delegated to another qualified organization. Such reviews shall be documented and maintained on file.

3.2.6 Changes to approved design documents shall be subjected to design control measures comparable with those that were applied to the original design and shall be approved by the same organization that approved the original design, unless delegated to another qualified organization.

3.2.7 Measures shall be established to assure that plant personnel and other affected organizations are made aware of design changes/ modifications that affect the performance of their duties.

4 - PROCUREMENT DOCUMENT CONTROL

4.1 PURPOSE

This section sets forth requirements for preparation, review, and approval of procurement documents and changes thereto in order to control the quality of vendor furnished safety-related plant items and services.

4.2 GENERAL

4.2.1 Procedures/instructions shall be established and implemented to control procurement-related activities such as procurement planning; preparation, review, approval and control of procurement documents; vendor selection; bid evaluations; and review and concurrence of vendors' quality assurance programs. These procedures/instructions shall clearly delineate the sequence of actions to be accomplished in the preparation, review, and approval of procurement-related documents and shall identify those positions or groups responsible for performing those actions.

4.2.2 Procurement documents for items (other than commercial grade/ off-the-shelf items, as defined in 10CFR21) and for services shall require, where necessary, vendors or subvendors to provide a quality assurance program consistent with the applicable provisions of the QA Program.

4.2.3 As deemed necessary, the procurement documents will provide for right of access to the vendor's facilities and records for source inspection/audit by Supply System or its designee.

4.2.4 Procurement documents shall contain or reference applicable technical requirements (such as regulations, specifications, drawings, codes, and standards), test and inspection requirements, and special process instructions that must be complied with by vendors.

4.2.5 Procurement documents shall contain, as applicable, requirements which identify the documentation (such as drawings, specification, inspection and test records, personnel and procedure qualifications, Certificates of Conformance or equivalent certifications, and material chemical and physical test results) to be prepared, maintained, submitted, or made available to Supply System for review and/or approval.

4.2.6 Procurement documents shall be reviewed by QA personnel. This review will be performed and documented to assure that quality requirements are correctly stated, that they can be inspected and controlled, and the procurement documents have been prepared to incorporate appropriate provisions of 4.2.2 through 4.2.5.

4.2.7 Changes (other than those that are of administrative nature) to approved procurement documents shall be subjected to the same degree of control that was applied during the preparation of original procurement documents.

5 - INSTRUCTION, PROCEDURES, AND DRAWINGS

5.1 PURPOSE

This section sets forth requirements for instructions, procedures, and drawings for activities that affect safety-related functions of plant items.

5.2 GENERAL

5.2.1 Activities that affect safety-related functions of plant items shall be described by and accomplished through implementation of documented procedures, instructions, or drawings, as appropriate.

5.2.2 Procedures/instructions shall be established to assure that procedures, instructions or drawings include appropriate quantitative (such as dimensions, tolerances, and operating limits) or qualitative (such as comparative workmanship samples) acceptance criteria for determining satisfactory work performance and quality compliance.

6 - DOCUMENT CONTROL

6.1 PURPOSE

This section sets forth requirements for the control of documents pertaining to activities that affect safety-related functions of plant items.

6.2 GENERAL

6.2.1 Procedures/instructions shall be established and implemented to control the issuance of documents such as instructions, procedures, and drawings, including changes thereto, which pertain to activities affecting safety related functions of plant items. These procedures/instructions shall provide assurance that:

a. Documents are reviewed for technical adequacy, by qualified individuals, prior to approval for release.

b. Procedures/instructions addressing maintenance, calibration, testing, drawings, specifications and etc. are reviewed and concurred with by qualified QA personnel for quality-related aspects prior to approval for release except in unusual situations wherein QA concurrence shall be obtained at the earliest available opportunity.

c. Maintenance, modification, and inspection procedures are reviewed by QA personnel to assure the need for inspection, identification of inspection personnel, and documentation of inspection results plus necessary inspection requirements, methods, and acceptance criteria is provided.

d. Documents are approved for release by authorized personnel prior to implementation.

e. Documents are available at the location where prescribed activity will be performed prior to commencing the work.

f. Changes (other than those that are of administrative nature) to approved documents are reviewed and approved by the same organizations that performed the original review and approval unless delegated to other appropriately qualified organizations.

g. Approved changes to documents are promptly incorporated into instructions, procedures, drawings, and other appropriate documents.

h. Obsolete or superseded documents are controlled to prevent their inadvertent use.

6.2.2 Current revision status of documents, such as instructions, procedures, drawings, and specifications shall be identified and maintained.

6.2.3 As a minimum, the applicable requirements of this section, shall be applied to the following documents:

a. Design documents

b. As-built drawings

c. Procurement documents

d. Operational QA Program Description

e. Final Safety Analysis Report

f. Procedures and/or instructions for plant modifications, operation, maintenance, inspection, testing and calibration

g. Reports of nonconformances

7 - CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

7.1 PURPOSE

This section establishes controls to assure that safety-related items and services, whether purchased directly or through contractors and subcontractors, conform to procurement documents.

7.2 GENERAL

7.2.1 Procedures/instructions shall be established and implemented for the control of purchased materials, equipment, and services. These procedures/instructions shall clearly describe the actions to be accomplished and identify those positions or groups responsible for performing those actions.

7.2.2 Material, equipment, services and spare/replacement parts (other than commercial grade/off-the-shelf items as defined in 10CFR21) for safety-related structures, systems and components:

a. Shall be procured from vendors whose quality assurance qualifications have been affirmed, either prior to or after award of the contract, by the corporate Quality Assurance, and

b. Shall be subject to the quality assurance program controls and to technical requirements at least equal to the original technical requirements or to revised controls that have been properly reviewed and approved.

7.2.3 Evaluation of vendors, including review and concurrence of vendors' QA programs, shall be performed by QA personnel competent in determining the ability of vendors to provide acceptable quality products. Source selection will be based on one or more of the following:

a. The ability of the vendor to comply with those elements of 10CFR50 Appendix B applicable to the type of material, equipment, or services being procured.

b. A review of previous record and performance of vendors who have provided similar articles of the type being procured.

c. A survey of the vendor's facilities and QA program to determine his capability to supply a product which meets the design, manufacturing, and quality requirements.

7.2.4 Source verification (vendor surveillance, inspection and audit) shall be commensurate with the relative importance, complexity, and quantity of the items or service procured and the vendor's quality performance. In-process and final surveillance requirements of vendor products shall be determined in advance and performed to assure conformance with procurement document requirements. Source verification is not required to be performed where the quality of the item can be verified by review of test reports, inspection upon receipt, or other means. Source verification activities shall include evaluation of vendor furnished Certificates of Conformance and/or vendor's Certification System.

7.2.5 Receiving inspection of vendor furnished items shall be performed to assure that:

a. The item is properly identified and corresponds to the identification on the procurement document and the receiving documentation.

b. The item and the acceptance records satisfy the inspection instruction prior to relying upon the item to perform its safety function.

c. Specified inspection, test, and other records are complete and available at the site prior to relying upon the item to perform its safety function.

d. Inspection status of accepted items is identified prior to their being released for storage, use or further work.

7.2.6 Documentary evidence that the vendor furnished items conform to the procurement requirements shall be retained at the site for the life of the items.

8 - IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

8.1 PURPOSE

This section sets forth requirements for identification and control of safety-related materials, parts, and components.

8.2 GENERAL

Procedures and/or instructions shall be established and implemented for the identification and control of items so as to prevent use of incorrect or defective items. These procedures and/or instructions shall assure that:

a. Identification requirements for items are established during initial planning (i.e. during generation of specifications and design drawings).

b. Identification of the item is maintained by heat number, part number, serial number or other appropriate means.

c. Identification of the item is maintained either on the item or on records traceable to the item.

d. The traceability of the item to appropriate documentation, such as specific inspection/test records, code data reports, and physical/chemical mill test reports, is maintained when such traceability is required by codes, standards or specifications.

e. Identification of the item is maintained throughout fabrication, shipping, installation and use of the item.

f. The location and method (such as application of metal tags or markings) of identification do not affect the safety-related function of the item.

g. Correct identification of the item is verified prior to release of the item for fabrication, shipping, assembling and installation.

9 - CONTROL OF SPECIAL PROCESSES

9.1 PURPOSE

This section sets forth requirements for special process activities which affect safety-related structures, systems, and components.

9.2 GENERAL

9.2.1 Special processes are those that require interim in-process controls in addition to final inspection and/or examination to assure achievement of required quality.

9.2.2 Procedures/instructions shall be established and implemented to assure adequate performance and control of special processes such as welding, heat treating, non-destructive testing, and chemical cleaning. These procedures/instructions shall contain provisions for:

a. Qualifying the personnel, equipment, and procedures to be utilized for performing special processes.

b. Documenting the evidence (inspection or process results) of acceptable performance of special processes.

9.2.3 Special processes shall be performed by qualified personnel utilizing qualified procedures and qualified equipment in accordance with applicable codes, standards, and specifications. For special processes not covered by existing codes or standards, the necessary qualifications of personnel, procedures, and equipment shall be defined in appropriate documents.

9.2.4 Procedures, equipment, and personnel to be utilized for the performance of special processes shall be qualified/certified by Quality Control/Quality Assurance personnel.

9.2.5 Qualification records of procedures, equipment, and personnel associated with special processes shall be established, filed, and maintained current.

10 - INSPECTION

10.1 PURPOSE

This section sets forth requirements for inspection of activities that affect safety-related functions of plant items.

10.2 GENERAL

10.2.1 Inspections which provide assurance that safety-related plant items and activities conform to applicable specifications, drawings, codes, standards, and regulations, shall be performed and documented in accordance with written and approved procedures, instructions or check lists.

10.2.2 Inspection procedures, instructions or check lists will, as appropriate, provide for:

a. Date inspection performed

b. Description of inspection method

c. Identification of characteristics and activities to be inspected.

d. Acceptance or rejection criteria

e. Identification of required procedures, drawings and specifications.

f. Specifying necessary measuring and test equipment including accuracy requirements

g. Identity of inspector and/or data recorder.

10.2.3 Inspections shall be performed by individuals otner than those who performed or directly supervised the activity being inspected.

10.2.4 Individuals performing inspections shall be qualified and the status of their qualifications shall be maintained current.

10.2.5 Where mandatory inspection holdpoints are identified in pertinent documents work shall not proceed beyond these holdpoints without the consent of responsible inspection personnel or group.

10.2.6 Inspection results shall be documented, evaluated, and their status recorded by a responsible individual or group.

11 - TEST CONTROL

11.1 PURPOSE

This section sets forth requirements for testing to assure that safety-related plant items will perform satisfactorily in service.

11.2 GENERAL

11.2.1 Tests required to demonstrate that plant items will perform satisfactorily in service shall be identified, documented, and performed in accordance with written and approved procedures/instructions.

11.2.2 Tests will include, as appropriate, the following:

a. Prototype qualification tests.

b. Proof tests prior to installation.

c. Preoperational and startup tests.

d. Surveillance tests during plant operation.

e. Tests associated with plant modification and maintenance activities.

11.2.3 Test procedures/instructions shall incorporate or reference, as appropriate, the following:

a. Instructions for performing the test.

b. Test prerequisites such as calibrated instruments, adequate test equipment, completeness of the item to be tested, and suitable environmental conditions.

c. Mandatory inspection hold points.

d. Acceptance/rejection criteria.

e. The requirements and acceptance limits contained in the applicable design documents.

f. Methods of documenting or recording test data and results.

g. Provisions for assuring that test prerequisites have been met.

11.2.4 Test results shall be documented, evaluated, and their status recorded by a responsible individual or group.

12 - CONTROL OF MEASURING AND TEST EQUIPMENT

12.1 PURPOSE

This section sets forth the requirements to establish those measures which will assure that tools, gages, instruments, and other measuring and testing devices used in activities affecting quality are controlled, calibrated, and adjusted at specified periods in order to maintain accuracy within necessary limits.

12.2 GENERAL

12.2.1 Measuring and test equipment (M&TE) shall be calibrated and adjusted using approved procedures/instructions.

12.2.2 A calibration program for the control and use of M&TE shall be established, and implemented. This program, as a minimum, shall provide for:

a. Unique identification of the item and its traceability to the calibration test data.

b. Labeling or tagging (or otherwise controlling) to indicate the due date of the next calibration.

c. Calibration technique and frequency.

d. Generation and maintenance of records which indicate the complete listing of all items under the calibration system together with their current calibration status.

e. Controlled environment conditions for sensitive and close tolerance M&TE.

12.2.3 M&TE shall be calibrated against certified calibrating standards having known valid relationships to nationally recognized standards. If no national standards exist, the basis for calibration will be documented.

12.2.4 Calibrating standards that are used for calibrating M&TE shall have tolerance not greater than one fourth (1/4) the tolerance of M&TE. Tolerances greater than 1/4 will be acceptable when limited by the state-of-the art. Calibrating standards shall be calibrated against higher level standards.

12.2.5 M&TE shall be calibrated and maintained at specified periods based on the required accuracy, purpose, stability characteristics, and other conditions affecting the measurement.

12.2.6 When an item of M&TE is found to be out of calibration, an evaluation shall be made and documented to determine the validity of previous inspection/test results and the disposition to be made of items previously inspected/tested.

13 - HANDLING, STORAGE, AND SHIPPING

13.1 PURPOSE

This section establishes controls for cleaning, handling, storage, packaging, shipping and preservation of safety-related items.

13.2 GENERAL

13.2.1 Cleaning, handling, storage, packaging, shipping and preservation of items shall be accomplished in accordance with written procedures/instructions, to prevent damage, loss or deterioration by environmental conditions. These procedures/instructions shall be prepared in accordance with the design and procurement requirements of the items.

13.2.2 When necessary for particular items, special coverings, special equipment and special protective environments, such as inert gas atmosphere, specific moisture content levels, and temperature levels, shall be specified, provided, and their existence verified.

13.2.3 Responsible personnel shall assure that items are identified, inventoried, adequately packaged to ensure integrity during transit, properly addressed and released and that these activities are documented.

13.2.4 Measures shall be established and implemented to control the storage of chemicals, reagents (including control of shelf-life), lubricants and other consumable materials for safety-related application.

14 - INSPECTION, TEST AND, OPERATING STATUS

14.1 PURPOSE

This section sets forth the requirements for identifying the inspection, test, and operating status of safety-related items.

14.2 GENERAL

Procedures/instructions shall be established and implemented for identifying the inspection, test, and operating status of plant items. These procedures/instructions shall include provisions for assuring that:

a. The application and removal of status indicators (stamps, tags, labels, routing cards, physical barriers, etc.) is controlled.

b. Items which require inspections and tests are identified and controlled to preclude bypassing of such inspections and tests.

c. The status of inspections and tests performed upon individual plant items is indicated by the use of status indicators or other suitable means.

d. The operating status of nonconforming, inoperative, or malfunctioning installed plant items is documented and identified to prevent inadvertent operation.

15 - NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

15.1 PURPOSE

This section sets forth requirements for the control of safety-related items, services, or activities which do not conform to specified requirements.

15.2 GENERAL

15.2.1 Measures shall be established to control nonconforming items to prevent their inadvertent use or installation. These measures shall include, as appropriate, procedures/instructions for identification, review, documentation, segregation, disposition, approval, and notification to affected organizations of nonconforming items.

15.2.2 Measures shall be established and documented defining the responsibility and authority for determining and approving the disposition of nonconforming items.

15.2.3 Nonconformances shall be documented. This documentation shall:

a. Clearly identify the nonconforming item; and

b. Describe the nonconformance, the disposition of nonconformance, and inspection/test requirements (where applicable).

15.2.4 Nonconforming items shall be reviewed and accepted for use-as-is, rejected, repaired, or reworked in accordance with documented procedures/instructions. The Supply System Quality Assurance shall review nonconformances to assure that dispositions have been evaluated and approved.

15.2.5 Acceptability of repaired, reworked and replaced item shall be verified and documented by inspecting and/or testing the item in accordance with original inspection and/or test requirements or approved alternatives.

15.2.6 Where feasible, nonconforming items shall be segregated from other acceptable items and/or uniquely identified as nonconforming until properly dispositioned for use.

16 - CORRECTIVE ACTION

16.1 PURPOSE

This section sets forth the requirements for identification, correction, documentation, and reporting of conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances.

16.2 GENERAL

16.2.1 Conditions adverse to quality shall be evaluated and the need for corrective actions determined in accordance with established procedures. These procedures shall provide for prompt identification and correction of conditions.

16.2.2 For conditions significantly adverse to quality, the corrective action procedures shall provide for the following:

a. Determination of the cause of the condition.

b. Corrective action so as to preclude repetition of the condition.

c. Verification of the implementation of the corrective action.

16.2.3 Conditions significantly adverse to quality, its cause, and the corrective action taken shall be documented and reported to appropriate levels of management for review and assessment.

17 - QUALITY ASSURANCE RECORDS

17.1 PURPOSE

This section sets forth requirements for generation, transmittal, retention, and maintenance of quality assurance records for Supply System's nuclear power plants.

17.2 GENERAL

17.2.1 Sufficient records shall be maintained to furnish evidence of the quality of safety-related plant items and activities. As a minimum these records shall include the following:

a. Operating logs

b. Results of design reviews, inspections, tests, audits, and material analysis

c. Monitoring of work performance

d. Qualifications of personnel, procedures, and equipment.

e. Drawings, specifications, procedures, and procurement documents.

f. Nonconformance and corrective action reports

g. Records as required by plant technical specifications.

17.2.2 Inspection and test records shall identify the following where applicable:

a. Inspector and/or data recorder
b. The type of observation
c. The date and results of inspection or test.
d. Acceptability of results.
e. The action taken to resolve any deficiencies noted.

17.2.3 Quality assurance records shall be generated (prepared, reviewed, and approved), accumulated, transmitted for incorporation into the records retention system, retained, maintained, and controlled in accordance with documented procedures and/or instructions.

17.2.4 The quality assurance records shall be organized and filed so that each document is identifiable and retrievable.

17.2.5 The quality assurance records shall be filed and maintained in facilities that provide protection from possible deterioration or damage and shall be controlled to prevent loss.

18 - AUDITS

18.1 PURPOSE

This section sets forth requirements for auditing to verify implementation and determine the effectiveness of the QA Program.

18.2 GENERAL

18.2.1 A comprehensive system of planned and documented audits by the corporate Quality Assurance, shall be carried out to verify compliance with applicable aspects of the QA Program. These audits shall consist of both internal audits of Supply System's nuclear power plants and other Supply System organizations and external audits of Supply System vendors performing activities covered by the QA Program.

18.2.2 Audits shall include the objective evaluation of work areas, activities, processes, and items; review of documents and records; and quality-related practices, procedures and instructions to determine the effectiveness of implementation of the QA Program.

18.2.3 Audits shall be scheduled based upon the status and safety importance of the activities.

18.2.4 Audits shall be performed in accordance with written procedures or check lists and conducted by appropriately trained personnel not having direct responsibilities in the areas being audited.

18.2.5 Audit results shall be documented by auditing personnel and reviewed by management having responsibility in the area audited.

18.2.6 Follow-up action on deficiencies shall be accomplished.

APPENDIX I

QUALIFICATION REQUIREMENTS

The qualification requirements for the position of Director of Quality Assurance include having a broad background and working knowledge of nuclear plant engineering, construction, and operating activities. Also required is knowledge of Quality Assurance regulations, policies, practices and standards and experience working in Quality Assurance or related activity in reactor design, construction or operation or in a similar high technology industry. Educational requirements include, as a minimum, a baccalaureate degree or equivalent* in Engineering or related science. The Director of Quality Assurance shall have four (4) years of experience 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) year of this four (4) years experience shall include detailed involvement in the administration of and adherence to the quality assurance program in a significant management role directly involving nuclear power plants, such as engineering, construction, operation, etc.

*Equivalency will be determined based upon an evaluation of the following factors:

a. High school diploma or GED.

APPENDIX I

QUALIFICATION REQUIREMENTS

b. Sixty (60) semester hours of related technical education taught at the college level (900 classrom or instructor conducted hours).

c. Qualified as an NRC senior operator at the assigned plant.

d. Four (4) years of additional experience in his area of responsibility.

e. Four (4) years of supervisory or management experience.

f. Demonstrated ability to communicate clearly (verbally and in writing).

g. Certification of academic ability and knowledge by corporate management.

h. Successful completion of the Engineer-In-Training examination.

i. Professional Engineer License.

j. Associate degree in Engineering or related science.

APPENDIX II

"POSITION STATEMENTS"

INTRODUCTION

This Appendix identifies those quality-related Regulatory Guides which the Supply System intends to follow during operations phase of its nuclear power plants. However, where the Regulatory Positions stated in these Regulatory Guides could lead to misunderstanding, or where alternate methods and/or solutions are implemented for accomplishment of Regulatory Positions, they are also described in this Appendix.

This Appendix is organized in three sections. Section II.1 describes Supply System Position Statements applicable to nuclear power plant WNP-2, Section II.2 is applicable to WNP-1/4, and Section II.3 is applicable to WNP-3/5. The Supply System commitments to comply with applicable Regulatory Guides not addressed in these sections of this Appendix are or will be documented in the applicable Final Safety Analysis Report.

The Supply System Positions, described in this Appendix, will be incorporated by Supply System organizations in their procedures and/or instructions for applicable activities.

This Appendix will be revised, as and when necessary, by the Supply System Quality Assurance Director, in accordance with the provisions of Section 2 of the QA Program.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.1 REGULATORY GUIDE 1.8, REV 1-R (May, 1977) - "Personnel Selection and Training"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.8, Rev. 1-R (May, 1977) and the requirements in the endorsed standard ANSI N18.1-1971.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.2 REGULATORY GUIDE 1.26, REV. 3 (February 1976) - "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.26, Rev. 3 (February 1976).

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.3 REGULATORY GUIDE 1.29, REV. 2 (February 1976) - "Seismic Design Classification"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.29, Rev. 2 (February 1976).

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.4 REGULATORY GUIDE 1.30 (Safety Guide 30, August 11, 1972) - "Quality Assurance Requirements for the Installation, Inspection and Testing of Instrumentation and Electric Equipment"

Supp' m Position

The Supply System will implement the provisions of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972) and the requirements in the endorsed standard ANSI N45.2.4-1972 (also designated as IEEE Std 336-1971), subject to the following:

1. Regulatory Position C.1 of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972) states that ANSI N45.2.4-1972 should be used in conjuction with ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants". It is the Supply System position that ANSI N45.2-1971 is not applicable for operational phase activities at nuclear power plants. Instead the Supply System will comply with its Position Statement on Regulatory Guide 1.33.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.4 REGULATORY GUIDE 1.30 (Cont'd.)

2. Regulatory Position C.3 of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972) states that the requirements promulgated by ANSI N45.2.4-1972 are also to be considered applicable for the installation, inspection, and testing of instrumentation and electric equipment during the operational phase of nuclear power plants. It is the Supply System position that the intent of ANSI N45.2.4-1972 will be maintained for all plant modifications.

3. Section 3(3) of ANSI N45.2.4-1972: Checking of records is normally accomplished during periodic surveillances and audits of the storage facility. The checking of storage records for each individual item prior to installation is not planned.

4. Section 5.1.2 of ANSI N45.2.4-1972: Inspections to verify housekeeping will be done as stated in the Supply System Position Statement on Regulatory Guide 1.39.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.4 REGULATORY GUIDE 1.30 (Cont'd.)

5. Section 5.2.1 of ANSI N45.2.4-1972: Tests will include those listed as appropriate. The manufacturers' recommendations shall be considered. The test procedure will specify the actual test to be performed.

6. Section 9 of ANSI N45.2.4-1972: The Supply System position, stated herein, does not address the codes and standards listed and/or referenced in this paragraph. Such position will be developed in the future, if the need arises.

7. Appendix A "Supplementary Provisions for Multi-Unit Stations" to ANSI N45.2.4-1972 is not considered applicable to WNP-2.

8. Appendix B "Additional Codes, Standards and Guides" to ANSI N45.2.4-1972: Refer to Supply System Position on Section 9 of ANSI N45.2.4-1972.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.5 REGULATORY GUIDE 1.33, REV 2 (February 1978) - "Quality Assurance Program Requirements (Operation)"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.33, Rev. 2 (February 1978) and the requirements contained in the endorsed standard ANSI N18.7-1976/ANS-3.2, subject to the following:

1. Regulatory Position C.2 of Regulatory Guide 1.33, Rev. 2 (February 1977) implies that the provisions contained in the latest revisions of the Regulatory Guides, listed therein, will be followed. The Supply System will follow its Position Statements on applicable Regulatory Guides as described throughout Section II.1 of this Appendix.

2. Section 5.2.13.4 of ANSI N18.7-1976/ANS-3.2: The third paragraph of this section is revised to read, "Special handling tools and equipment shall be inspected and/or tested, as necessary, in accordance with written procedures and at specified times to verify that the tools and equipment are adequately maintained".

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.5 REGULATORY GUIDE 1.33 (Cont'd.)

3. Section 5.2.17 of ANSI N18.7-1976/ANS-3.2 states that inspection of operating activities may be conducted by second-line supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work. The Supply System position is to allow the plant operations' shift supervisors (first-line supervisors) to perform inspections of surveillance tests, provided that an after-the-fact review of surveillance documentation is performed by the Operations Supervisor (a second-line supervisor) or by other personnel not assigned first-line responsibility for the conduct of the work.

4. Sections 5.2.19.1 and 5.2.19.2 of ANSI N18.7-1976/ANS-3.2 describe rules of practice for preoperational and startup test program. The Supply System intends to comply with the provisions of these sections. In cases, where conflicts exists between these sections and Regulatory Guide 1.68, the Supply System will comply with the implementation of Regulatory Guide 1.68 as described in Chapter 14 "Initial Test Program" of the Final Safety Analysis Report.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.6 REGULATORY GUIDE 1.37 (March 16, 1973) - "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.37 (March 16, 1973) and the requirements in the endorsed standard ANSI N45.2.1-1973, subject to the following:

1. Regulatory Position C.4 of Regulatory Guide 1.37 (March 16, 1973) states, in part, "Chemical compounds that could contribute to intergranular cracking or stress-corrosion cracking should not be used with austenitic stainless steel and nickel-base alloys". In clarification, the Supply System will abide by the chemical composition limits established by its Nuclear Steam Supply System vendor, with regard to control of marking materials, paints, chalk, mineral and organic acids, chemical compounds, materials, solvents and chemicals used for cleaning, and plastic films.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.6 REGULATORY GUIDE 1.37 (Cont'd.)

2. Regulatory Position C.5 of Regulatory Guide 1.37 (March 16, 1973) states, in part, "Specifically, tools which contain materials that could contribute to intergranular cracking or which, because of previous usage, may have become contaminated with such materials should not be used on surfaces of corrosion - resistant alloys". In clarification, the Supply System will abide by the chemical composition limits established by its Nuclear Steam Supply System vendor, with regard to control of grinding tools and materials, wire brushing tools and materials, chipping tools and materials, and sanding tools & materials.

3. Section 2.1 of ANSI N45.2.1-1973 states, in part, "Planning for cleaning activities shall include a review of the system and component design specifications and drawings. In clarification of this requirement, a review of system and component design specifications and drawings will be required for only those modifications which change the design of a fluid system.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.6 REGULATORY GUIDE 1.37 (Cont'd.)

4. Section 2.3 of ANSI N45.2.1-1973, last sentence, is revised to read, "Test reports shall include an evaluation of the acceptability of inspection and test results and provide for identifying the individual who performed the evaluation."

5. Section 3.1.2.1 of ANSI N45.2.1-1973 states, in part, "Scattered areas of rust are permissible provided the aggregate area of rust does not exceed two square inches in any one square foot area." The Supply System considers this two square inch limit as a guide only. Adequate discretion by experienced personnel will be used in all cases.

6. Section 3.1.2.5 of ANSI N45.2.1-1973 states, in part, "There shall be no evidence of organic contamination in the effluent water or on the filter." The Supply System intends to comply with this requirement. The presence of organic contamination will be determined visually or by feel.

7. Section 4 of ANSI N45.2.1-1973, second sentence, is revised to read, "Inspections, examinations, or tests for cleanliness shall be performed if it is suspected that cleanliness has been affected by transportation to, or storage at the installation site."

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.6 REGULATORY GUIDE 1.37 (Cont'd.)

8. Section 7.4 of ANSI N45.2.1-1973 requires checking of cleaning solutions for effectiveness of inhibitors (if used). In clarification of this requirement, the effectiveness of inhibitors (if used) will be determined by documentation in technical literature or manufacturer's or vendor's recommendations.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.7 REGULATORY GUIDE 1.38, Rev. 2 (May 1977) - "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage, and Handling of Items for Water-Cooled Nuclear Power Plants"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.38, Rev. 2 (May, 1977) and the requirements in the endorsed standard ANSI N45.2.2-1972, subject to the following:

1. Section 3.2.1 (1) of ANSI N45.2.2-1972: Temperature and humidity control considerations for packaging of Level A items are not considered applicable to nuclear fuel assemblies unless recommended otherwise by the nuclear fuel manufacturer. The Supply System will abide by the manufacturer's recommendation.

2. Section 3.5.2 of ANSI N45.2.2-1972, last sentence, is revised to read as, "Tapes used for identification rather than sealing which are not near a welding operation may remain indefinitely (see also Appendix section 3.5.2 for additional requirements)."

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.7 REGULATORY GUIDE 1.38 (Cont'd.)

3. Section 3.7.1 (1) of ANSI N45.2.2-1972: The Supply System may use cleated, sheathed boxes for loads up to 1,000 pounds rather than 500 pounds limit imposed here. This type of box has been tested by WNP-2 Nuclear Steam Supply System vendor, and been found safe for loads up to 1,000 pounds. Other national standards allow the 1,000 pounds designation; see Federal Specification PPP-B-601.

4. Section 6.1.2 (1) of ANSI N45.2.2-1972: Temperature and humidity controls required for the storage of Level A items are not considered applicable for nuclear fuel assemblies unless recommended otherwise by the nuclear fuel manufacturer. The Supply System will abide by the manufacturer's recommendation.

5. Section 6.4.2 (6) of ANSI N45.2.2-1972: Provisions of this section, concerning periodic rotation and the degree of rotation of shafts of rotating equipment, while in storage, will be complied with unless recommended otherwise by the manufacturers. The Supply System will abide by the manufacturers' recommendation.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.7 REGULATORY GUIDE 1.38 (Cont'd.)

6. Appendix Sections A3.4.1 (4) and A3.4.1 (5) of ANSI N45.2.2-1972: During printing of the standard, a transposition occurred between the last sentences of these sections. The Supply System will comply with the correct wording which reads as follows:

A3.4.1 (4), last sentence: However, preservatives for inaccessible inside surfaces of pumps, valves and pipe for systems containing reactor coolant water shall be the water flushable type.

A3.4.1 (5): The name of the preservative used shall be indicated to facilitate touch up.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.8 REGULATORY GUIDE 1.39, REV. 2 (September 1977) - "Housekeeping Requirements for Water-Cooled Nuclear Power Plants"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.39, Rev. 2 (September 1977) and the requirements in the endorsed standard ANSI N45.2.3-1973, subject to the following:

Section 2.1 of ANSI N45.2.3-1973 requires the establishment of cleanness requirements for housekeeping activities on the basis of zone designations. The Supply System considers these zone designation and the requirements associated with each zone as impractical for implementation during the operation phase. Procedures or insructions for housekeeping activities, which include the applicable requirements outlined in Section 2.1 of ANSI N45.2.3-1973 and which take into account the radiation control considerations, security considerations, and cleanness requirements, will be developed on case by case basis for maintenance and modification work to be performed.

APPENDIX II

II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.9 REGULATORY GUIDE 1.58, Rev. 1 (September 1980) - "Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel"

Supply System Position

The Supply System will comply with the provisions of Regulatory Guide 1.58, Rev. 1 (September 1980) and the requirements in the endorsed standard ANSI/ASME N45.2.6-1978, subject to the following:

1. Regulatory Position C.1 of Regulatory Guide 1.58, Rev. 1 (September 1980) states that the guidelines provided by Regulatory Guide 1.8 should be followed in lieu of guidelines of ANSI/ASME N45.2.6-1978 for qualification of personnel (a) who approve preoperational, startup, and operational test procedures and test results and (b) who direct or supervise the conduct of individual preoperational, startup, and operational tests. Supply System takes exception to this regulatory recommendation as the approved version of Regulatory Guide 1.8 (endorses ANSI N18.1) does not contain guidelines addressing the subject personnel.

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II.1.9 REGULATORY GUIDE 1.58 (Contd.)

Instead, those Supply System personnel who approve pre-operational, startup and operational test procedures and test results will be qualified in accordance with the Supply System Position Statement on Regulatory Guide 1.8. Supply System personnel who direct or supervise the conduct of individual pre-operational, startup and operational tests will be qualified to the applicable requirements of ANSI/ASME N45.2.6-1978.

2. Regulatory Position C.5 of Regulatory Guide 1.58, Rev. 1 (September 1980) implies that individuals who review and approve inspection, examination, and testing procedures and those who evaluate the adequacy of such procedures to accomplish the inspection, examination, and test objectives, should meet the Level III capability requirements delineated in Table 1 of ANSI/ASME N45.2.6-1978. Not all Supply System personnel performing the types of cited functions will meet the Level III capability requirements of Table 1 of ANSI/ASME N45.2.6-1978. However, personnel performing the cited functions will be determined by Supply System management through evaluation of their education, training, and experience to be fully qualified and competent. The basis for the determination will be documented.

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3. Section 1.2 of ANSI/ASME N45.2.6-1978, fourth paragraph, states that the requirements of this Standard apply to personnel of the owners and their suppliers. In clarification, the extent of application of the requirements of ANSI/ASME N45.2.6-1978 to Supply System suppliers will depend upon the nature and extent of materials or services furnished, and as further described in Supply System Positions on Sections 2.4 and 3 of ANSI/ASME N45.2.6 - 1978.

4. Section 2.1.2 of ANSI/ASME N45.2.6-1978 implies that personnel performing non-NDE type of inspections, examinations, and testing will be formally certified. The Supply System does not plan this formal certification. Instead, the Supply System will select such personnel to predetermined qualification requirement for the specified task based on their education, experience, and training. Formal training records, when used as the basis for qualification, will be maintained on file.

5. Section 2.4 of ANSI/ASME N45.2.6-1978 requires issuance of formal certification to individuals and specifies the details of the information to be included in the certificate. The Supply System does not plan to issue formal certificates to individuals performing inspections, examinations, and testing, that fall

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within the scope of ANSI/ASME N45.2.6-1978 and Regulatory Guide 1.8. However, information similar to the one described in this section of the Standard will be available in documented form attesting that the individual is capable of performing the assigned task(s). The Supply System will use a similar approach in evaluating its suppliers' compliance with this section of the Standard.

6. Section 3 of ANSI/ASME N45.2.6-1978 divides the capability requirements of inspection, examination, and testing personnel into three levels, namely Level I, Level II, and Level III. The Supply System will not assign these levels to its personnel performing inspection, examination, and testing activities. However, the selection of personnel for particular tasks will be such as to match the capabilities to the types of tasks, and maintain the intent of the three levels. The judgement to determine that a person's qualifications and capabilities meet the intent of a certain level of inspection, examination, and testing function is made by the normal management process, using established administrative and personnel procedures. Documentation for such justification will be maintained on file. A similar approach will be used to evaluate qualifications of non-NDE personnel of Supply System suppliers.

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II.1.10 REGULATORY GUIDE 1.64, REV. 2 (June 1976) - "Quality Assurance Requirements for the Design of Nuclear Power Plants"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.64, Rev. 2 (June 1976) and the requirements in the endorsed standard ANSI N45.2.11 - 1974, subject to the following:

Regulatory Position C.2 of Regulatory Guide 1.64, Rev. 2 (June 1976) states that individuals performing design verification should not have immediate supervisory responsibility for the individual performing the design. It further states that while design verification by the immediate supervisor is encouraged, it should not be construed that such verification constitutes the required independent design verification. It is Supply System Position that in case the designer's immediate supervisor is the most technically qualified individual available in the organization to perform a design verification by design review, this review may be conducted by the supervisor, providing that:

a. the justification is individually documented and approved in advance by the supervisor's management; and

b. Quality Assurance audits cover frequency and effectiveness of use of supervisors as design verifiers to guard against abuse.

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II.1.11 REGULATORY GUIDE 1.74 (February 1974) - "Quality Assurance Terms and Definitions"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.74 (February 1974) and the quality assurance terms and definitions in the endorsed standard ANSI N45.2.10 - 1973, subject to the following:

1. Regulatory Position "C" of Regulatory Guide 1.74 (February 1974) specifies certain documents recommended to be included in the definition of "procurement documents", defined in ANSI N45.2.10 - 1973. The Supply System will use the following definition:

   Procurement Documents - Purchase requisitions, purchase orders and contracts with attachments necessary to specify/verify requirements.

2. Section 2 of ANSI N45.2.10 - 1973: The definition of "specification" is revised to read as follows:

   Specification - A statement of a set of requirements to be satisfied by a product, a material, a service or process indicating, whenever appropriate the procedure by means of which it may be determined whether the requirements given are satisfied.

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II.1.12 REGULATORY GUIDE 1.88, REV. 2 (October 1976)-"Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records."

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.88, Rev. 2 (October 1976), and the requirements in the endorsed standard ANSI N45.2.9-1974, subject to the following:

1. Regulatory Position C.2 of Regulatory Guide 1.88, Rev. 2 (October 1976) endorses the 4-hour fire rating requirements for a single records storage facility as described in Section 5.6 of ANSI N45.2.9-1974. The Supply System modifies this 4-hour rating requirement of ANSI N45.2.9-1974 to 2-hour fire rating requirement. Accordingly, the Supply System will comply with a substitute to third, fourth, and fifth paragraphs of Section 5.6 of ANSI N45.2.9-1974 which reads, "Where a single record storage is maintained, the QA records shall be maintained in either:

   a. A 2-hour vault meeting NFPA (National Fire Protection Association) No. 232-1975 without additional provisions; or

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II.1.12 REGULATORY GUIDE 1.88 (Contd.)

b. 2-hour rated file containers meeting NFPA No. 232-1975 (Class B) without additional NFPA provisions; or

c. 2-hour rated fire resistant file room meeting NFPA No. 232-1975 with the following additional provisions:

(1) Early warning fire detection and automatic fire suppression shall be provided, with electronic supervision at a constantly attended central station.

(2) Records shall be stored in fully enclosed metal cabinets. Records shall not be permitted on open steel shelving. No storage of records shall be permitted on the floor of the facility. Adequate access and aisle ways shall be maintained at all times throughout the facility.

(3) Work not directly associated with records storage or retrieval shall be prohibited within the records storage facility. Examples of such prohibited activities include but are not limited to: records reproduction, film developing, and fabrication of microfiche cards.

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II.1.12 REGULATORY GUIDE 1.88 (Contd.)

(4) Smoking and eating/drinking shall be prohibited throughout the records storage facility.

(5) Ventilation, temperature, and humidity control equipment shall be protected inside with standard fire-door dampers where they penetrate fire barriers bounding the facility."

2. Section 3.2.2 of ANSI N45.2.9-1974 is revised to read, "Index - The quality assurance records shall be indexed. The indexing system(s) shall include, as a minimum, record retention times and the location of the records within the record system. The indexing system(s) shall provide sufficient information which can be used to identify item(s) or activity(ies)."

3. Section 5.4.3 of ANSI N45.2.9-1974 is revised to read, "Special Processed Records - Provisions shall be made for special processed records (such as radiographs, photographs, negatives, and microfilm) to prevent damage from excessive light, stacking, electromagnetic fields, and temperature. These provisions will be delineated in procedures and/or instructions which will incorporate, or take into consideration, available manufacturers' recommendations."

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II.1.13 REGULATORY GUIDE 1.94, REV. 1 (April 1976) - "Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Steel During the Construction Phase of Nuclear Power Plants"

Supply System Position

Regulatory Guide 1.94, Rev. 1 (April 1976) and the endorsed standard ANSI N45.2.5-1974 are not considered applicable to operations phase activities. However, the guidance provided by Regulatory Guide 1.94, Rev. 1 (April 1976), where appropriate, will be utilized for those applicable operational phase activities that are comparable to activities occurring during the construction phase.

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II.1.14 REGULATORY GUIDE 1.116, REV. 0-R (May 1977) - "Quality Assurance Requirements for Installations, Inspection, and Testing of Mechanical Equipment and Systems"

Supply System Position

The Supply System will imp'ement the provisions of Regulatory Guide 1.116, Rev. 0-R (May 1977) and the requirements in the endorsed standard ANSI N45.2.8-1975, subject to the following:

1. Regulatory Position C.3 of Regulatory Guide 1.116, Rev. 0-R (May 1977) recommends that the requirements of Section 5 of ANSI N45.2.8-1975 pertaining to preoperational tests, cold functional tests, and hot functional tests should be used in conjunction with Regulatory Guide 1.68. The Supply System will comply with the implementation of Regulatory Guide 1.68 as described in Chapter 14 "Initial Test Program" of the Final Safety Analysis Report.

2. Section 2.3 of ANSI N45.2.8-1975, last sentence is revised to read, "Test reports shall include an evaluation of the acceptability of inspection and test results and provide for identifying the individual who performed the evaluation."

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II.1.14 REGULATORY GUIDE 1.116 (Contd.)

3. Section 2.8.2 of ANSI N45.2.8-1975 states, "Records of calibration shall be included in inspection and test results." Supply System does not intend to include calibration records in inspection and test results. Instead, the calibration records will be maintained in a separate file.

4. Section 2.9.e(6) of ANSI N45.2.8-1975 states, "Evidence that engineering or design changes are documented and approved prior to installation." The Supply System may permit installation of an item prior to approval of the related engineering or design change provided procedural controls, requiring evidence of engineering or design change approval prior to placing the affected item into service, are instituted.

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II.1.15 Regulatory Guide 1.123, Rev. 1 (July 1977) - "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants"

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.123, Rev. 1 (July 1977), and the requirements in the endorsed standard ANSI N45.2.13-1976, subject to the following:

1. Regulatory Position C.3 of Regulatory Guide 1.123, Rev. 1 (July 1977): During printing of the Regulatory Guide, an error occurred in the last sentence. The Supply System will comply with the correct wording which reads as follow:

   While Section 9 of ANSI N45.2.13-1976 addresses elements of the Purchaser's corrective action system, these same elements are applicable to the Supplier's corrective action system when one is required.

2. Section 1.3 of ANSI N45.2.13-1976: The Supply System will comply with the definition of "procurement documents" as stated in Supply System Position Statement on Regulatory Guide 1.74 (February 1974).

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II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.15 Regulatory Guide 1.123 (Contd.)

3. Section 3.2.2. of ANSI N45.2.13-1976: The first sentence of this Section is revised to read:

"Technical requirements shall be specified in the procurement documents by reference to or inclusion of applicable specific drawings, necessary portions of specifications, codes, regulations, procedures, or instructions (including revisions thereto) needed to accurately describe the products or services to be furnished."

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II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.16 REGULATORY GUIDE 1.144, REV. 1 (September 1980) - "Auditing of Quality Assurance Programs for Nuclear Power Plants."

Supply System Position

The Supply System will implement the provisions of Regulatory Guide 1.144, Rev. 1 (September 1980) and the requirements in the endorsed standard ANSI N45.2.12 - 1977, subject to the following:

Section 4.4.4 of ANSI N45.2.12-1977 requires the audit report to include an evaluation statement regarding the effectiveness of the quality assurance program elements that were audited. Since the audit by its very nature is an evaluation of the quality assurance program effectiveness, the audit report itself is considered to be an evaluation of the quality assurance program effectiveness. This section of the Standard, is therefore, revised to read as, "A Summary of Audit Results."

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II.1 "POSITION STATEMENTS FOR WNP-2"

II.1.17 REGULATORY GUIDE 1.146, (August 1980) - "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"

Supply System Position

The Supply System will implement the provision of Regulatory Guide 1.146 (August 1980) and the requirements in the endorsed standard ANSI N45.2.23-1978.

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II.2 "POSITION STATEMENTS FOR WNP-1/4"

This section will be developed at a later date.

APPENDIX II

II.3 "POSITION STATEMENTS FOR WNP-3/5"

This section will be developed at a later date.