

PROPOSED REVISIONS TO FSAR SECTION 1.8,  
"QUALITY ASSURANCE PROGRAM"

- Page 1.8-4 This page is being revised to remove the reference to Figure 15.6.2-2 of the Technical Specifications. This figure has been removed from the Technical Specifications.
- Page 1.8-5 This page is being revised to include the new Nuclear Power Department Procedures Manual as one of the manuals that governs Quality Assurance Section activities.
- Page 1.8-6 This page is being revised to reflect changes in the mechanism for the administration of corrective actions. Quality Assurance Section personnel will only monitor the status of open items identified by the Quality Assurance Section. The status of all other open items will be monitored by the Operating Experience Review and the Regulatory Services groups.
- Page 1.8-7 This page is being revised to describe the mechanisms controlling the distribution and maintenance of the Nuclear Power Department Procedures Manual.
- Page 1.8-7 This page is also being revised to state that the status and adequacy of the Quality Assurance program will be accomplished by periodic briefings of the President. Currently, briefings with the President are held at least once every two months. This revision will provide the Manager-Quality Assurance Section, the Vice President-Nuclear Power, and the President with the flexibility to determine the appropriate frequency for the required briefings. This revision is not seen as a reduction in commitment since the Manager-Quality Assurance Section has access to the President with respect to quality assurance concerns whenever deemed necessary.
- Figure 1.8-1 This figure is being revised to reflect the appropriate organizational structure of Wisconsin Electric Power Company.
- Figure 1.8-3 This figure is being revised to reflect the appropriate organizational structure of the Quality Assurance Section.

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

#### Manager - Nuclear Operations

The Manager-Nuclear Operations is the senior company representative at the plant facility and, as such, is in direct day-to-day control of all normal plant administration and technical operations. In matters related to quality assurance, the Manager remains cognizant through direct involvement and through input from various sources including the Site Quality Assurance group.

#### Manager - Quality Assurance

The Manager - Quality Assurance as the head of the Quality Assurance Section (QAS) reports to the Vice President - Nuclear Power Department and has responsibility for both "headquarters" quality assurance functions and various quality assurance activities at the site. The QA Section has staff located both in the corporate office and at the plant. The QA Section is divided into four groups (see Figure 1.8-3) with primary responsibilities summarized as follows:

#### Site Quality Assurance

1. Perform quality assurance reviews of maintenance and modification documents. In regard to modifications this includes scoping for QA applicability of work to be performed.
2. Perform reviews of all NPD generated procurement documents. These reviews include scoping for QA applicability and establishment of appropriate quality assurance requirements.
3. Verify conformance of received items to purchase document requirements through various activities including review of documentary evidence of quality prior to release of the items (Section 1.8.7).

4. Monitor performance of in-plant contractors through surveillances.
5. Provide primary interface between plant groups and other department groups in matters related to quality assurance.
6. Report to the Manager-QA on matters involving quality assurance.
7. Assist plant groups in interpreting quality related codes, standards and procedures.
8. Provide guidance and direction as necessary to in plant groups in regard to conformance to NPD QA policies and procedures and performance of quality related functions, e.g. records administration, quality control.

#### Quality Verification

1. Implement the internal audit program to verify compliance to established quality assurance program requirements and satisfactory performance of quality activities. This includes audits of in-plant groups as well as off-site company organizations performing quality-related activities for Point Beach. It also includes audits of the Technical Specifications which are performed under the cognizance of the Off-Site Review Committee.
2. Perform quality assurance evaluations, audits and surveys of vendors and contractors commensurate with the importance, complexity, and quality of the product or services provided.
3. Maintain lists of qualified suppliers including periodic review of supplier performance.
4. Provide support to Point Beach for source verification of procured items.
5. Provide quality support to Point Beach for major projects under the scope of the WE QA program.
6. Perform periodic surveillances of day-to-day plant activities.

#### Quality Support

1. Control issuance of quality assurance instructions and procedures manuals that govern QAS activities, including the Nuclear Power Department QA Policy Manual, Nuclear Power Department QA Procedures Manual, and the QAS Instructions Manual, and the Nuclear Power Department Procedures Manual.
2. Coordinate and perform QA indoctrination and training, as applicable.

3. Tracking internally identified deficiencies. Tracking includes monitoring of open items identified by QAS and notifying appropriate management when items become delinquent.
4. Self-assessment support and facilitation for PBNP.

#### Quality Technical Services

Provide support to Point Beach for nondestructive examination services related to inservice inspection activities.

#### Off-Site Review Committee

The Off-Site Review Committee (OSRC) is established in accordance with Technical Specifications, Section 15.6.5.2. The OSRC selectively reviews designated activities involving the operation of Point Beach Nuclear Plant including Technical Specification compliance. The committee's specified duties and functions are described in the PBNP Technical Specifications, Section 15.6.5.2.1.

In addition to the above, the OSRC is also tasked with the responsibility of assessing the adequacy and effectiveness of the Nuclear Power Department (NPD) Quality Assurance Program. This is done in concert with their review functions as described above in addition to review of NPD QA policies, procedures and practices. Assessment of the program is also achieved through other means such as initiation of periodic audits.

#### 1.8.2 QUALITY ASSURANCE PROGRAM

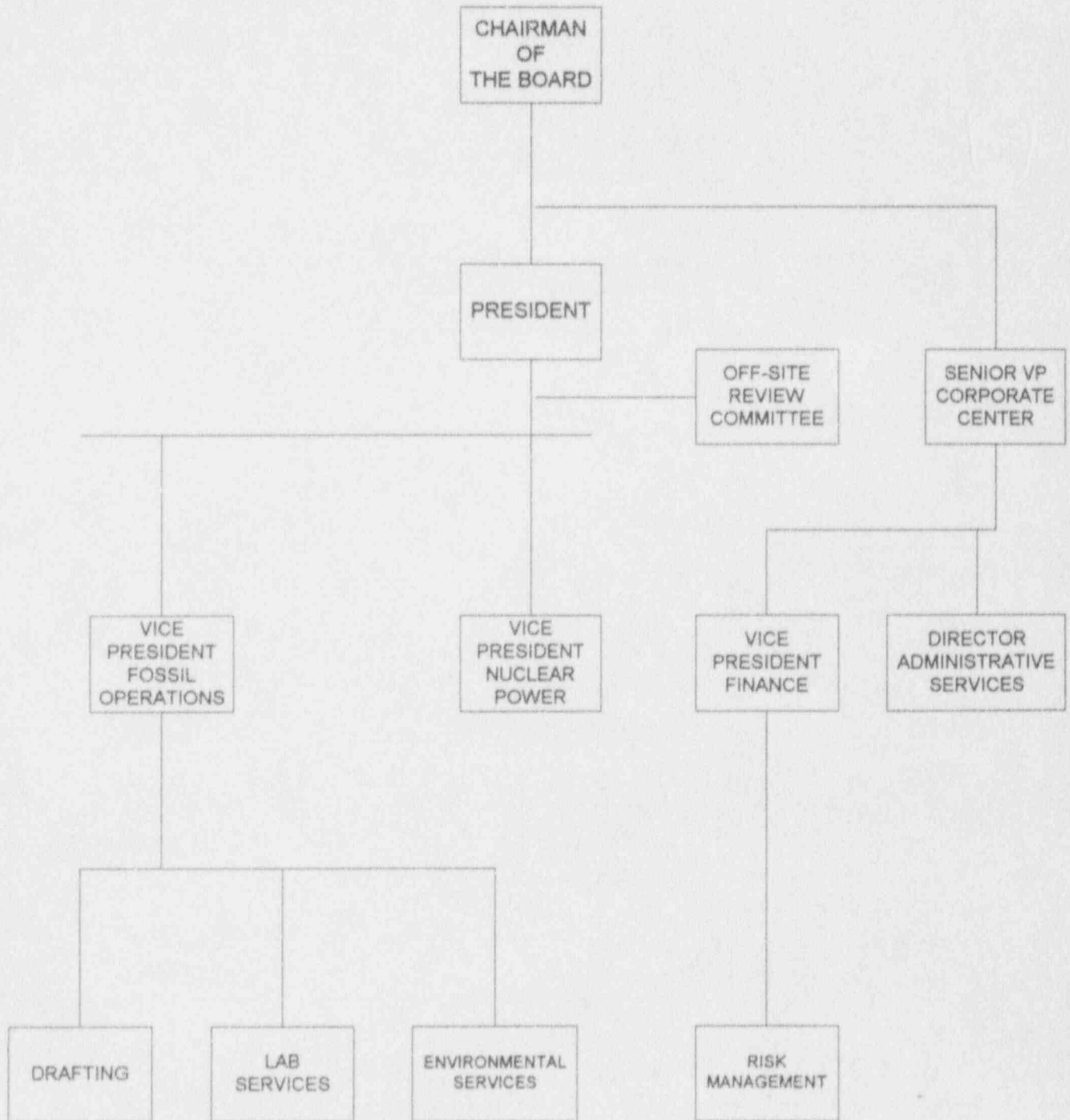
A quality assurance program is established and implemented in accordance with written policies, procedures, and instructions which comply with the requirements of 10 CFR 50 Appendix B and 10 CFR 71, Subpart H. The program is also applied to activities such as fire protection to a degree commensurate with Wisconsin Electric commitments. Specific QA Program applicability to fire protection, radioactive material packaging and station blackout is defined in Tables 1.8-2, 1.8-3 and 1.8-4, respectively. The Nuclear Power Department Quality Assurance Program is set forth in the NPD QA Policy Manual,

the NPD QA Procedures Manual, the QAS Instructions Manual, and the PBNP Administrative Control Policies and Procedures Manual, and the NP Department Procedures Manual. Control of the above manuals is as follows:

1. Distribution and maintenance of the "Nuclear Power Department Quality Assurance Policy Manual" and revisions thereto are controlled by the Quality Assurance Section. The policies in this manual are approved by the Vice President - Nuclear Power Department.
2. Distribution and maintenance of the "Nuclear Power Department Procedures Manual" and revisions thereto are controlled by the Nuclear Planning Systems and Support Section. The manual procedures and subsequent revisions are approved by the designated section manager within the Nuclear Power Department assigned primary responsibility for the procedure.
23. Distribution and maintenance of the "Nuclear Power Department Quality Assurance Procedures Manual" and revisions thereto are controlled by the Quality Assurance Section. The manual procedures and subsequent revisions are approved by the designated section manager within the Nuclear Power Department assigned primary responsibility for the Quality Procedures.
34. Distribution and maintenance of the "PBNP Administrative Control Policies & Procedures Manual" and revisions thereto are controlled by the Nuclear Operations Section. The manual is reviewed and approved on-site by the plant organization.
45. The QAS Instructions Manual, and revisions thereto, are controlled and approved by the QAS section manager.

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

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



# QUALITY ASSURANCE SECTION ORGANIZATION

