

DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR

STATEMENT OF QUALITY ASSURANCE POLICY

The Quality Assurance Program described herein has been developed by Dairyland Power Cooperative (DPC) to assure safe and reliable operation of La Crosse Boiling Water Reactor (LACBWR) in a SAFSTOR condition. This program is designed to meet the requirements of Title 10 of the Code of Federal Regulations, Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," as it would apply to a possession-only condition.

The Quality Assurance Program applies to all activities affecting the functions of the structures, systems, and components that are associated with a possession-only license. These activities include design, operations, maintenance, repair, fuel handling, testing and modifications. Design and fabrication of shipping casks used for shipment of radioactive material will not be conducted under this Quality Assurance Program.

The DPC QA Director is responsible for the establishment of a Quality Assurance Program which meets the requirements of 10 CFR 50, Appendix B, and implementation of the program.

William L Berg
(General Manager)

May 19, 1994
(Date)

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REVD: <u><i>Blaney</i></u> <u>4-25-94</u> QA Director Date	APPROVED:	
REVD: <u><i>John S. Parry</i></u> <u>5/12/94</u> Plant Manager Date	<u><i>William L Berg</i></u> <u>5/19/94</u> General Manager Date	

0.0 INTRODUCTION

A. General

The La Crosse Boiling Water Reactor (LACBWR) Quality Assurance Program is designed to meet the requirements of 10 CFR 50, Appendix B, and reflects the direction of applicable regulatory guides and industry standards, as they apply to a possession-only condition, thereby assuring that the health and safety of the public is not caused undue risk.

The program described herein is applied by Dairyland Power Cooperative (DPC) to assure safe operation of the LACBWR facility. It applies to those identified structures, systems, and components associated with a safe storage condition. It shall be applied to activities such as design, procurement, modifications, fabrication, installation, maintenance, testing, and fuel handling at the LACBWR plant by DPC or its subcontractors.

Design and fabrication of shipping casks used for shipment of radioactive material will not be conducted under this Quality Assurance Program.

Quality Assurance (QA) as defined herein encompasses all those planned and systematic actions necessary to provide adequate confidence that a component, structure, or system will perform satisfactorily in service. It is recognized as an interdisciplinary function and not the sole responsibility of the Quality Assurance Department.

It is DPC's policy that the group performing and directly responsible for the work, such as engineering, design, procurement, maintenance, and testing is responsible for the quality of work. This includes quality control and verification that their work is performed in accordance with approved documents. The QA Department has responsibility for auditing the other groups and assuring DPC management that the QA Program is being fully implemented.

B. Terms and Definitions

The definitions listed below are used frequently throughout this document.

COMPANY - Dairyland Power Cooperative (DPC)

LACBWR - La Crosse Boiling Water Reactor.

QUALITY ASSURANCE (QA) - All those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service.

QUALITY CONTROL (QC) - Those Quality Assurance actions which provide a means to control and measure the characteristics of an item, process or facility to established requirements.

ORC - Operations Review Committee.

FACILITY - Encompasses the site and facility systems which support a possession-only license condition, but excludes electric power transmission apparatus located beyond the site switchyard.

PLANT PROCEDURE - A document describing the manner of conducting an action or process.

ADMINISTRATIVE CONTROL PROCEDURE (ACP) - A document which establishes the guidelines and requirements governing functional activities (i.e., Administration, Material Request, Control Room Log, etc.).

QUALITY ASSURANCE INSTRUCTION (QAI) - A document which establishes the guidelines and requirements governing quality assurance and control activities.

QA MANUAL - Manual comprised of the QA Program Description.

SRC - Safety Review Committee.

QUALITY ASSURANCE PROCEDURE (QUA) - A document which establishes the guidelines and requirements governing the Generation Division quality-related activities.

The Plant Manager directly supervises and coordinates all activities related to possession-only operation and maintenance of the facility through the Shift Supervisors and coordinates the activities of the maintenance departments. The Plant Manager ensures that regular inspections of the facility are performed and reviews all log sheets, malfunction reports, and maintenance records. The Plant Manager is concerned with the detailed operation and maintenance of the facility. The Plant Manager enforces all facility operating and safety procedures and assures that approved operating and maintenance procedures are followed.

4. A Shift Supervisor has responsibility for establishing and implementing a training and requalification program for operators in accordance with applicable regulations.
5. Quality / ssurance Director has responsibility for establishing a quality assurance program, performing audits of the program to determine its effectiveness. The Quality Assurance Director has the authority to stop fabrication, installation, or testing of structures, systems, or components which do not conform to specifications or approved procedures.
6. The Operations Review Committee is an advisory committee to the Plant Manager. They review facility operations and verify implementation of site quality assurance practices. The minutes of the ORC are distributed to the Safety Review Committee.
7. The Safety Review Committee is an advisory committee responsible to the General Manager for independent reviews and audits to verify that the facility is being maintained consistent with company safety, administrative, and licensing provisions.
8. Technical Support Staff consists of onsite and offsite engineers, covering various disciplines, responsible to the Plant Manager. They provide technical services to the Plant Manager in areas of licensing, analyzing test results, design changes, and may, as requested, perform audits to provide assurance that facility activities are being performed consistent with approved procedures and licensing provisions.

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B. Facility Organization Requirements

1. The facility organization includes one or more individuals trained in the various disciplines as noted in Figure 1.
2. Job descriptions have been provided for all personnel of the LACBWR staff. The job descriptions identify the authority and responsibility that are associated with the position.

C. Dairyland Power Cooperative Organization

Figure 2 shows the organization structure for the Dairyland Power Cooperative. The LACBWR facility is a responsibility of the General Manager. The Materials Management Division has responsibility for all purchases as they apply to all generating stations, including LACBWR. The Materials Management Division has responsibility for control, identification, and issuance of all materials, parts, and components. Materials Management is under the Assistant General Manager for Finance and Administration.

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B. Applicability

The LACBWR QA Program is based on the requirements of 10 CFR 50, Appendix B, "Quality Assurance Requirements for Nuclear Power Plants," and Regulatory Guide 1.33 which addresses the applicable requirements of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," as they apply to a possession-only license.

C. Implementation

Individuals assigned responsibilities, as discussed under "ORGANIZATION," shall prepare administrative and quality assurance procedures as necessary to implement the requirements of this program. Procedures shall include appropriate quantitative and qualitative acceptance criteria necessary to determine that the activity is being properly performed. Audit reports are distributed to DPC management for their review and assessment of the QA Program, as to effectiveness, scope, adequacy, and implementation. Indoctrination in the QA Program requirements shall be provided to all facility personnel performing activities which could affect the quality of components, systems, or structures.

5. The Operations Review Committee is responsible for reviewing all proposed modifications for facility changes and recommending approval or disapproval to the Plant Manager. The review shall determine whether the proposed modifications involve any unreviewed safety question or a possible change in the Technical Specifications.
6. The Plant Manager is responsible for reviewing the recommendations of the Operations Review Committee and taking appropriate action. He shall refer any unreviewed safety question to the Safety Review Committee.
7. The Safety Review Committee is responsible for providing an independent review of requests for facility changes. They shall provide assurance that the facility modification meets the design bases, regulatory requirements, and applicable codes and standards.

C. Requirements

1. A Facility Change Proposal shall be initiated for all modifications. Facility Change Proposals may be initiated by any knowledgeable personnel.
2. All proposed modifications shall be reviewed to determine whether they involve an unreviewed safety question.
3. Design bases, regulatory requirements, and applicable codes and standards shall be delineated for all proposed plant modifications. These shall be incorporated into drawings, specifications, procurement documents, and procedures by the Job Coordinator. The Quality Assurance Department shall specify appropriate quality standards.
4. A Design Control Procedure shall be prepared to describe and control the design changes from inception through final approval, release, distribution, and implementation of the change. The procedure shall provide for the review of stress, hydraulic, thermal, and accident analyses, compatibility of materials, maintenance, test, and repair. The procedures provide for a design review by an engineer or other qualified individual other than the one who performed the design.

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	PROCUREMENT DOCUMENT CONTROL	
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REVD: <u><i>Bob Wang</i></u> <u>4-25-94</u> QA Director Date	APPROVED:	
REVD: <u><i>Jan A. Payne</i></u> <u>5/12/94</u> Plant Manager Date	<u><i>William L Berg</i></u> <u>5/19/94</u> General Manager Date	

IV. PROCUREMENT DOCUMENT CONTROL

A. General

This section establishes the measures to assure that procurement documents (purchase requisitions and orders) covering material, equipment, and services specify appropriate quality requirements. The purchase order specifies or references the applicable requirements, design bases, codes, and standards to assure quality.

B. Responsibilities

1. The Quality Assurance Department is responsible for developing procedures to control the preparation, review, and approval of purchase orders for material, equipment, and services covered by the Quality Assurance Program.
2. LACBWR Staff are responsible for initiation of material requisition worksheets for material, equipment, and services required for maintenance, repair, and minor modifications, as applicable to the needs of their departments.
3. The Engineering Staff is responsible for preparing engineering specifications which detail the technical and quality requirements for material, equipment, and services. Engineering is also responsible for preparing material requisition worksheets for material, equipment, and services required for major facility modifications.
4. Purchasing is responsible for preparing, reviewing, approving, issuing, and controlling purchase orders.

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C. Requirements

1. Purchase requisitions for new material, equipment, and services and for spare or replacement parts shall be initiated by any department personnel. The purchase requisition shall contain the information such as quantity, item description, and technical and quality requirements necessary for procurement of the item.
2. Purchase orders shall include specifications which contain all the information necessary to assure that material, equipment, and services are of adequate quality. This shall include material selection, design data, equipment description, source inspection and testing requirements, cleaning, and packaging requirements, and required documentation as deemed necessary.
3. Documentation required to provide evidence that materials, equipment, and services are of adequate quality shall be clearly delineated in purchase orders. This shall include a listing of each item of documentation to be submitted, when it is to be submitted, what requires approval prior to manufacture, and to whom it shall be submitted.
4. To the extent necessary, procurement documents shall require suppliers of material, equipment, and services to have a quality assurance program complying with the pertinent provisions of 10 CFR 50, Appendix B. Suppliers shall be required to provide DPC access to their facilities and records for inspection and audit, as required, to determine compliance with provisions of the purchase order. These requirements shall extend to lower tier procurements, as determined by DPC management.
5. Purchase requisitions and engineering specifications shall be reviewed by the Quality Assurance Department to assure that all necessary technical and quality requirements are included or referenced.
6. Formal purchase orders which have been prepared from the purchase requisition shall be reviewed to assure that all required information is correctly incorporated.
7. Changes in technical content in procurement documents shall be initiated and reviewed in accordance with the same procedures utilized in preparation of the original document. The Plant Manager's approval is required prior to any changes being implemented to previously approved documents which are quality related.

C. Requirements

1. Detailed instruction for possession-only operation of the plant shall be contained in procedures and checklists covering the following activities:
 - a. administrative control,
 - b. general system operation,
 - c. startup, operation, and shutdown of systems,
 - d. correction of abnormal, off-normal, or alarm conditions,
 - e. control of emergencies and other significant events,
 - f. radioactivity control,
 - g. chemical and radiochemical control,
 - h. security
 - i. quality assurance
 - j. fuel handling, and
 - k. or any other procedures required by Regulatory Guide 1.33, Revision 2, for a possession-only condition.
2. For activities other than those within normal craft expertise, instructions for maintenance and repair shall be contained in procedures. These procedures shall contain instructions for preparation, performance, checkout and return to service. The procedures may reference manufacturer's instruction manuals, drawings, and other sources, as applicable.
3. Instructions, procedures, or drawings shall delineate the method and sequence by which an activity is to be performed. These documents shall include appropriate quantitative or qualitative acceptance criteria for determining that the activity has been satisfactorily performed.
4. The department responsible for an activity shall be required to provide the necessary internal review and approval of instructions, procedures, or drawings prior to performing the activity.

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5. Changes to or deviations from established instructions, procedures, or drawings will require the same review and approval as the original released document. However, temporary changes to procedures which do not change the intent of the original procedure may be made in ink, dated, and approved by two people on the facility staff. Such changes shall be documented and reviewed in accordance with Technical Specifications.
6. Applicable sections of the appropriate procedures shall be followed in the review, processing of changes or deviations, filing, and distribution of procedures, drawings, and specifications.

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2. All documents shall have an identification number, title, date, and revision number. Documents shall be filed and controlled by use of this identification. Each type of document shall be filed in a central location identified in a document control procedure.
3. Drawings, specifications, and procedures, including revisions, shall be reviewed for adequacy and approved for release by authorized personnel. The required reviews and approvals shall be specified in a document control procedure.
4. The Administrative Secretary shall assure that current documents are distributed to and used at the location where the prescribed activity is performed. Documents and revisions shall be distributed as specified in a document control procedure. Preliminary and superseded documents shall be clearly identified and closely controlled to preclude their misuse.
5. An index of each type of document shall be established and maintained to provide the current status of documents.

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EQUIPMENT, AND SERVICES

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D. Source Inspection

1. When appropriate, suppliers shall be requested to furnish DPC with sufficient information concerning their manufacturing and inspection plan to permit DPC or their designated agent to plan and implement a source inspection plan.
2. When appropriate, inspection plans shall include witness and hold points for inspection of items, witnessing of processes or tests, audit of required quality documentation, and verification that vendors have complied with the specification requirements and have documented any deviation from the specifications.

E. Receiving Inspection

1. Items shall be examined by the Storekeeper upon receipt for shipping damage, correctness of identification, and specified quality documentation, in accordance with approved instructions.
2. Documentary evidence that items conform to purchase order requirements shall be available at the plant prior to installation or use of the item.
3. Documentary evidence shall be sufficient to identify the specific requirements such as codes, standards, and specifications met by the purchased item. This requirement shall be satisfied by having available at the plant, copies of the purchase order and appropriate documents referenced therein.
4. All QC ordered materials, parts, and components will be segregated upon receipt and will be placed in a receiving inspection hold area separate from storage facilities. After acceptance, the material will be stamped as acceptable and placed in specified spare parts storage.
5. During receiving inspection, if a nonconformance or discrepancy exists, the material shall be placed on hold and will remain in a hold status until final disposition is determined. A Discrepancy Report shall be initiated.
6. Items dispositioned as unacceptable for use shall be rejected and removed from the controlled receiving inspection area.

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QUALITY ASSURANCE
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IDENTIFICATION AND CONTROL OF
MATERIAL, PARTS, AND COMPONENTS

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2. Specifications shall require that materials, parts, and components are identified in accordance with purchase order numbers and shall require that documentation have identification providing traceability to the item.
3. Physical identification by purchase order number shall be used to the maximum extent possible for relating an item at any time to applicable documentation. Identification shall be either on the item or records traceable to the item. Where physical identification is impractical, physical separation, procedural control, or other appropriate means shall be employed.

C. Requirements

1. Welding, heat treating, cleaning or decontamination of parts, and non-destructive examination shall be accomplished under controlled conditions in accordance with applicable codes, standards, criteria, and other special requirements, using qualified personnel and procedures. Qualification of personnel and procedures shall comply with the requirements of applicable codes and standards.
2. Welders and welding procedures shall be qualified in accordance with Section IX of the ASME Boiler and Pressure Vessel Code. Records of the test results obtained in welding procedures and welder performance qualifications and a listing of qualified personnel and procedures shall be maintained.
3. Non-destructive examination personnel shall be qualified in accordance with the American Society for Non-destructive Testing Standard SNT-TC-1A. Records of training, test results, and a listing of qualified personnel shall be maintained.
4. Plant procedures shall be established to describe the requirements for qualification of personnel and procedures.
5. Procedures shall be established to describe the method used to control the receipt, storage, baking, drying, and disbursal of welding filler metals.
6. Equipment used for accomplishing special processes shall be calibrated, maintained, stored, handled, and issued in accordance with applicable procedures.

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REVD: <u>[Signature]</u> 4-25-94 QA Director Date	APPROVED:	
REVD: <u>[Signature]</u> 5/12/94 Plant Manager Date	<u>William L Berg</u> 5/19/94 General Manager Date	

X. INSPECTION

A. General

This section establishes a program for inspection of possession-only activities to verify conformance with approved procedures, drawings, and specifications.

B. Responsibilities

1. The Quality Assurance Department is responsible for assuring that adequate inspection requirements are included in engineering specifications and for reviewing any inspection procedures that implement this section of the manual.
2. The QA Department is responsible for establishing inspection procedures and assuring that adequate inspection requirements are included in procedures. They are also responsible for coordinating the assignments of qualified inspection personnel.
3. The Plant Manager shall be responsible for approving inspection procedures. The Plant Manager shall also assure that sufficient inspections are performed to provide adequate confidence that activities meet predetermined requirements.

C. Requirements

1. Inspections shall only be performed by qualified personnel. In no case shall the acceptance inspection be performed by the individual who performed the activity.
2. Mandatory inspection hold points, which require witnessing or inspecting of an activity before processing, shall be indicated in the appropriate procedures or specifications. The inspection shall be documented to indicate approval and release prior to continuation of the activity.

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3. Inspection requirements shall apply to all activities whether performed by company personnel or contractor personnel, and shall require that inspection procedures and instructions are provided with necessary drawings prior to commencing inspection activities.
4. Inspection requirements governing modifications, repairs, and replacement shall be in accordance with the original design and inspection requirements or as amended by approved changes to the original design.

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	TEST CONTROL	
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REVD: <u><i>Bob Wray</i></u> <u>7-25-94</u> QA Director Date	APPROVED:	
REVD: <u><i>James P. ...</i></u> <u>5/12/94</u> Plant Manager Date	<u><i>William L Berg</i></u> <u>5/19/94</u> General Manager Date	

XI. TEST CONTROL

A. General

This section establishes the requirements for a test program to demonstrate that structures, systems, and components will perform satisfactorily in service. The test program shall include, but not be limited to, surveillance testing, special tests, post maintenance testing, and testing following modification or significant changes in procedures.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing the requirements to control the test program. The test program shall include, but not be limited to, surveillance testing, special tests, post maintenance testing, and testing following modification or significant changes in procedures.
2. The facility Engineers and/or designated Supervisors shall be responsible for preparation and review of test procedures, surveillance during testing, and review and documentation of test results.
3. The Plant Manager is responsible for the approval of test procedures. He is also responsible for the conduct of all testing associated with LACBWR.
4. The Engineering Staff is responsible for establishing specifications, requirements and acceptance criteria for testing following plant modifications. Engineering also shall review and approve test results for testing following plant modifications.

5. The Operations Review Committee is responsible for the review of all proposed test procedures and for review of procedures for special testing and performance testing following facility modification.
6. The Safety Review Committee is responsible for reviewing proposed tests which involve an unreviewed safety question and is responsible for reviewing the safety evaluation for tests completed under the provisions of a safety analysis, to verify that such tests did not constitute an unreviewed safety question.

C. Requirements

1. A program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and documented.
2. Testing shall be performed in accordance with approved test procedures which incorporate or reference the requirements and acceptance criteria contained in applicable design documents and Technical Specifications.
3. Test procedures shall incorporate, but not be limited to, requirements for such items as: hold points, witness points, caution notes, emergency requirements and test jumper logs.
4. Test procedures shall include, as a minimum, provisions for assuring that:
 - a. Prerequisites have been completed that include, as a minimum:
 - 1) Control of systems status as necessary.
 - 2) Availability of calibrated instrumentation and special equipment.
 - b. Test objectives and applicable acceptance limits are stated.
 - c. Test results are documented.
 - d. Detailed instructions for performing the test are included.
 - e. Test results are reviewed and approved.

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5. Test reports shall include identification of the inspector, individual conducting the test, the data recorder, the type of observation made, the equipment used, the test results, the acceptability of the test results, and approved disposition for any deviations.

Test results which fail to meet the requirements and acceptance criteria shall be properly noted and appropriate corrective action taken.

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CONTROL OF MEASURING AND TEST
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2. To assure equipment accuracy, inspection, measuring, and test equipment shall be controlled, calibrated, adjusted, and maintained periodically, or prior to use. Calibrations are performed against certified measurement standards that are traceable to nationally recognized standards. Where national standards do not exist, provisions will be established to document the basis for calibration. Control measures and procedures shall prevent the use of calibrated tools, gauges, instruments, and other measuring and test equipment by unauthorized personnel. Special calibration and control measures are not required for devices when normal commercial practices provide adequate accuracy.
3. Measuring and test equipment shall be controlled by a permanently affixed serial number. Calibration decals, tags or stickers shall be displayed prominently on each device and shall reflect the item serial number, the date of calibration, and due date of the next calibration (for recurring calibration).
4. When an item of measuring and test equipment is found to be out of calibration, an investigation will be conducted and documented to determine the validity of previous inspections, tests, or calibrations which were performed with the use of that item.
5. Records or logs of the calibration history of measuring and test equipment shall be maintained.

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REVD: <u><i>St. Way</i></u> <u>4-25-94</u> QA Director Date	APPROVED:	
REVD: <u><i>J. D. Pugh</i></u> <u>5/12/94</u> Plant Manager Date	<u><i>William L. Berg</i></u> <u>5/19/94</u> General Manager Date	

XIII. HANDLING, STORAGE, AND SHIPPING

A. General

This section establishes the requirements for procedures to control the handling, storage, shipping, cleaning, packaging, and preservation of material and equipment to prevent damage, deterioration, or loss through shipment installation or use.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing requirements for the handling, storage, and shipping of materials, parts, and components covered by the Quality Assurance Program.
2. The Plant Manager is responsible for implementing the requirements of this section of the Quality Assurance Program Description and shall approve all implementing procedures.

C. Requirements

1. The requirements for handling, storage, shipping, cleaning, and preservation of materials, and equipment shall be documented in approved procedures.
2. Procurement documents shall include instructions for the handling, storage, shipping, cleaning, and preservation of the item being supplied as applicable.
3. Procurement documents specify marking requirements, special covering, and protective environments, such as inert gas atmosphere, moisture content levels, and temperature levels, as applicable.

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4. Specifications and procedures establish the requirements for special handling tools and equipment to ensure safe and adequate handling of critical, sensitive, or radioactive items.
5. Special handling tools and equipment will be inspected and tested in accordance with approved procedures, at specified intervals, to verify that tools and equipment are adequately maintained.
6. Materials and equipment will normally be handled by stockroom personnel. Fuel and other special shipments which require special equipment and handling will be handled by others. The proper use of fuel handling equipment will be described in fuel handling procedures.
7. Storage of material and equipment will be in areas free from fumes, vapors, and dust. Storage will be in areas protected from the weather and in which chemical storage is excluded, except as may be specifically authorized in writing. Storage will be in areas which satisfy the handling and storage requirements specified for the item.

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3. Systems, components, and equipment which are found to be unacceptable during or after testing shall be clearly identified in the Shift Supervisor's Log Book or on the Test Data Sheets.
4. Fuel handling operations involving fuel assemblies or other radioactive sources shall be identified and controlled by the use of tags, control log sheets, or other suitable means.
5. Facility maintenance, repair, or modification of components, systems, or structures will utilize a test sheet or Shift Supervisor log entry to indicate its acceptance or rejection for a particular component, system, or structure.
6. Maintenance Requests shall be used to originate, approve, authorize, and document all non-routine maintenance or repair work performed at LACBWR.

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3. Deficiencies which cannot be corrected by the vendor shall be reviewed by the Engineering Staff. The Engineering Staff will recommend repair, rework, accept, or reject. Items shall be repaired or reworked only in accordance with approved procedures and shall be reinspected after repair by the QA Department. QA shall ensure that documented and approved procedures are available prior to repair or rework and shall reinspect all repaired or reworked items.

Items which are accepted for use with a known deficiency shall be fully documented with the specification requirement, justification for acceptance, and effect of such use. All such items shall be approved prior to use by the Plant Manager.

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2. Conditions adverse to quality which involve design deficiencies or recommended corrective action which involves a design change shall be reviewed by the Engineering Staff.
3. Nonconforming materials, parts, or components shall be identified by a Deficiency Report. A Deficiency Report shall be initiated and processed whenever the actual condition is not in accordance with drawings or specifications. Corrective action is an integral part of the nonconforming control system.
4. Maintenance Requests can be a part of the documented corrective action program.
5. Quality Assurance Department shall audit corrective actions to assure that the cause of the condition has been determined and that corrective action has been taken in accordance with recommendations.

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D. System Requirements

1. A system shall be established to identify all documents that must be kept permanently (lifetime records). An index of non-permanent records shall be established.
2. An approved document listing will be reviewed on a regular basis to verify that the record file contains the latest revisions of all required documents.
3. A system will be established to control the issuance and return of all records.

5. Quality Assurance Auditors shall assess the following:
 - a. evaluation of quality assurance practices, procedures, and instructions;
 - b. effectiveness of implementation; and
 - c. conformance with approved procedures.
6. A system of planned and scheduled audits shall be generated. In addition, audits shall be conducted on an unscheduled basis, when one or more of the following conditions exist:
 - a. When significant changes are made in functional areas of the Quality Assurance Program, including significant reorganizations and procedural revisions.
 - b. When it is suspected that safety performance, or reliability of an item is questionable due to deficiencies or nonconformances in the Quality Assurance Program.
 - c. When a systematic, independent assessment of program effectiveness or item quality, or both, is considered necessary.
 - d. When it is considered necessary to verify the implementation of required corrective actions.
7. Deficiencies or nonconformances uncovered during an audit shall be documented and brought to the attention of the Plant Manager. A reaudit shall be performed to verify that corrective actions have been taken to correct the deficiencies or nonconformances.
8. Audit reports are sent to DPC management for their review and assessment of the QA Program.

TABLE 1

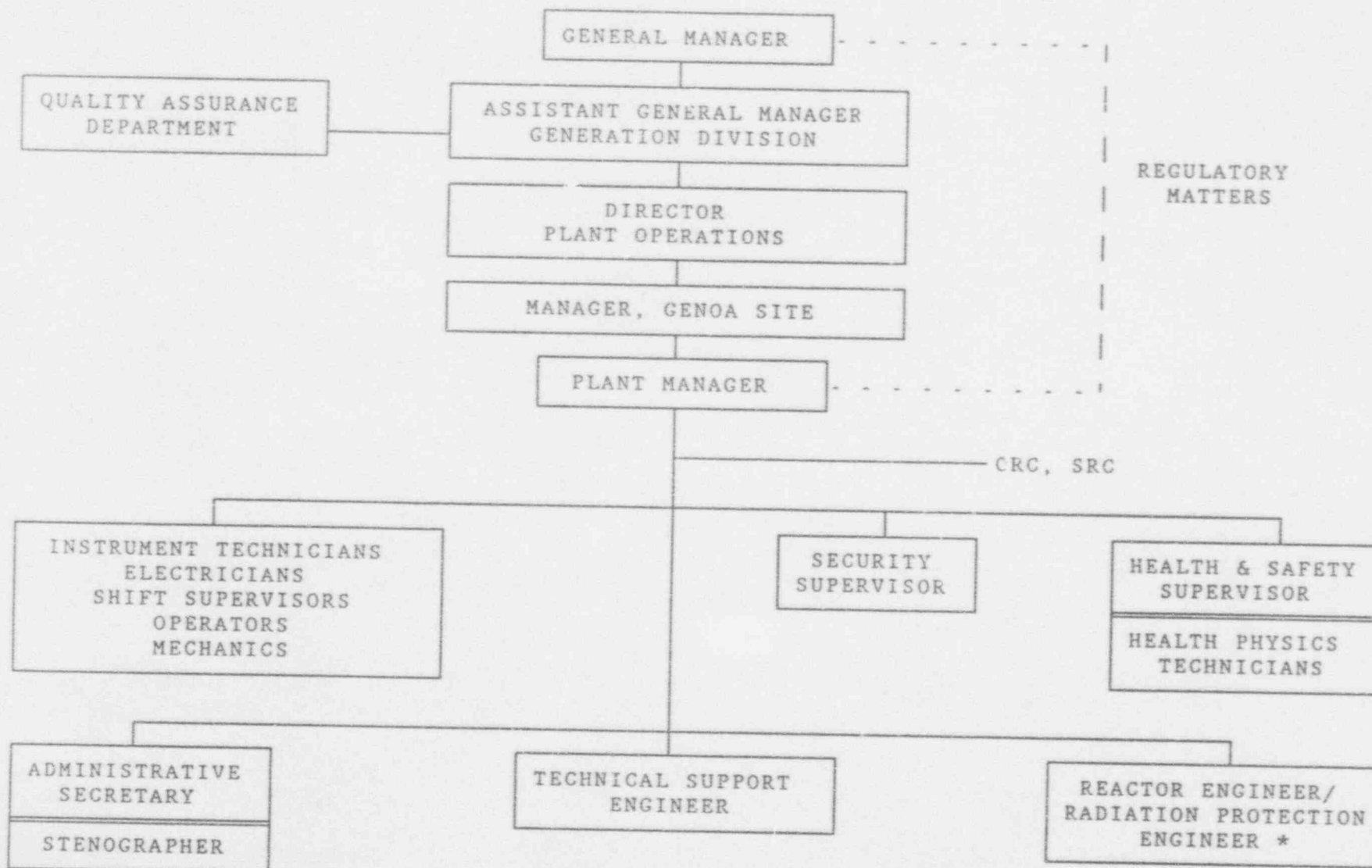
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CORRELATION OF LACBWR QUALITY ASSURANCE PROGRAM WITH REGULATORY GUIDE 1.33 REQUIREMENTS

LACBWR QUALITY ASSURANCE PROGRAM (SECTION)	REGULATORY GUIDE 1.33		
	IMPLEMENTING PROCEDURES	ANSI 18.7 (SECTION)	10 CFR 50 APPENDIX B (SECTION)
0.0 INTRODUCTION	-	-	-
I. ORGANIZATION	ACP-02.1, ACP-03.1	1, 3.1, 3.2, 3.4.2	I
II. QUALITY ASSURANCE PROGRAM	ACP-03.1, QAI-1	3.1, 3.2, 3.3, 3.4.2, 5.1, 5.2	II
III. DESIGN CONTROL AND REVIEW	ACP-04.1, ACP-03.3, ACP-04.3	5.2.7.2	III
IV. PROCUREMENT DOCUMENT CONTROL	ACP-05.1	5.2.13.1	IV, V, VI
V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS	LACBWR OPERATING MANUAL ACP-06.1, ACP-06.2	5.2.7, 5.3	V
VI. DOCUMENT CONTROL	ACP-06.1, 06.3, 07.1, 07.3 ECP-2, QAI-2, QAI-3	5.2.15	VI
VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES	ACP-08.2, ACP-08.4 QUA-006, 007	5.2.13.2	VII, VIII
VIII. IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, & COMPONENTS	ACP-09.1, ACP-30.1	5.2.13.3	VIII
IX. CONTROL OF SPECIAL PROCESSES	ACP-10.1, ACP-10.3	5.2.12., 5.2.18	IX
X. INSPECTION	ACP-11.1, QUA-002, 003, 004, 005, 006, 008, 009, 010, 011	5.2.17	X
XI. TEST CONTROL	ACP-12.1	5.2.19	XI
XII. CONTROL OF MEASURING AND TEST EQUIPMENT	ACP-13.1	5.2.16	XII
XIII. HANDLING, STORAGE, & SHIPPING	ACP-14.0, ACP-30.1	5.2.13.4	XIII
XIV. INSPECTION, TEST AND OPERATING STATUS	ACP-2.3, ACP-11.1, ACP-12.1 ACP-15.1, ACP-15.2	5.2.6, 5.2.14	XIV
XV. NONCONFORMING MATERIALS, PARTS, OR COMPONENTS	ACP-16.0, QAI-7	5.2.14	XV
XVI. CORRECTIVE ACTION	ACP-17.1, 17.2, 17.3, 17.4	5.2.11	XVI
XVII. QUALITY ASSURANCE RECORDS	ACP-18.1	5.2.12	XVII
XVIII. AUDITS	QAI-5, QAI-6, ACP-19.0	4.5	XVIII

FIGURE 1

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* Duties to be performed with assistance of qualified consultants when necessary.



FIGURE 2

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MANAGEMENT ORGANIZATION
MARCH 1993

