



Northern States Power Company

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10 CFR 50
Section 50.54(a)

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

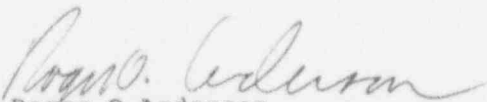
PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License No. DPR-42
50-306 DPR-60

Submittal of Changes to Revision 17 of the
Operational Quality Assurance Program Plan (OQAP)

Pursuant to 10 CFR 50 Section 50.54(a), a copy of proposed changes to Revision 17 to the Northern States Power Company Operational Quality Assurance Plan (OQAP) is submitted for NRC approval.

The proposed changes have been internally reviewed and approved. It was concluded that the proposed changes do not significantly reduce the commitments of NSP's Operational Quality Assurance Plan nor do they adversely impact safe operation of the nuclear power plants. The proposed changes, the reason for change, and the basis for concluding that the changes satisfy the criteria of 10 CFR 50 Appendix B and the USAR are provided as an enclosure. Also enclosed is copy of the Revision 18 of the OQAP which includes the proposed changes. Revision 18 will not be implemented until approval has been obtained from NRC Region III.

This submittal does not contain any new NRC commitments. Please call Mel Opstad at 612-295-1653 or Paul Kamman at 612-337-2211 if there are any questions.


Roger O Anderson
Director
Licensing and Management Issues

c: Regional Administrator-III, NRC
NRR Project Manager (Monticello), NRC
NRR Project Manager (Prairie Island), NRC
Resident Inspector (Monticello), NRC
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Enclosures

File: E:\D04560\CORPFILE\QA\OQAP_R18.MPI

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Northern States Power Company
Proposed Change to the Operational Quality Assurance Plan, Revision 17

Pursuant to 10 CFR Part 50, Section 50.54(a)(3), Northern States Power Company proposes the following changes to the Operational Quality Assurance Plan.

Proposed Changes:

This change proposes to incorporate in Revision 18 of the Operational Quality Assurance Plan (OQAP) a simplified representation of the Northern States Power (NSP) organization and the functions performed by the organization. This change would replace current sections 3.2, *Quality Organization Summary*, and 3.3, *Corporate Organization with Operational Quality Assurance Program Responsibilities*, and the current organization chart (Figure 1) with a revised organization chart (as the new Figure 1) showing the primary management positions and their functional responsibilities. Attachment 1 shows the proposed changes in markup form.

Reason for Change:

It is NSP's intention to present an accurate and clear portrayal of its organization and the functions of each of the organizational units, while simplifying the description of the organizational structure of NSP and simplifying the revision process to show changes in the organization. The increasingly competitive climate for power producers has necessitated NSP to reorganize many of its traditional organizational structures in order to remain cost efficient and competitive. The proposed changes would present a clearer representation of NSP's organization with the emphasis on operational quality assurance responsibilities. These changes allow NSP to focus on changes to the OQAP that have real benefits to the quality of the Plan instead of dedicating efforts to revising section 3.3 and explaining the managerial title changes, reassignment of reporting responsibilities and/or reassignment tasks due to reorganization.

Basis for Concluding the Change Satisfies the Criteria of 10 CFR 50, Appendix B, and the USAR

Criterion I of 10 CFR Part 50, Appendix B, requires that the authority and duties of persons and organizations performing activities affecting the safety-related functions of structures, systems, and components shall be clearly established and delineated in writing.

The proposed changes meet the Appendix B requirements and do not represent a significant reduction in current commitments. The proposed changes will describe the authority and duties of persons and organizations performing QA activities in a manner appropriate for an upper tier document and is consistent with other requirements in the OQAP. Other NSP documents, which provide the detail of the assigned responsibilities, are not affected by this proposed change.

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The proposed change is consistent with NSP's own requirements for the Operational Quality Assurance Program as described in section 4.0, *Operational Quality Assurance Program*, of the OQAP. Section 4.3-1, *Operational Quality Assurance Plan*, states that the OQAP shall be a document which describes in general terms how compliance with the quality requirements of 10CFR50, Appendix B, and 10CFR71, Subpart H, is accomplished with respect to company nuclear plants regulated by an NRC Operating License. The proposed changes are consistent with this approach to the OQAP. Section 4.4-1, *Administrative Control Directives*, states that the Administrative Control Directives shall be documents which establish responsibility and requirements governing activities associated with plant operation. The proposed changes do not change this function of the Administrative Control Directives.

The Administrative Control Directives will continue to provide the detail as to which managerial positions are responsible for specific operational quality assurance requirements. All of the Administrative Control Directives include a section for identifying the responsibilities of key personnel positions associated with the QA activities addressed by that specific Administrative Control Directive. The Administrative Work Instructions, which provide guidelines or instructions for the implementation of the requirements of Administrative Control Directives, also include a section that identifies responsibilities for key personnel in implementing the requirements of the Administrative Control Directives. The USAR will continue to include a summary of the responsibilities and duties of key site and plant operating staff personnel for the purpose of explaining the conduct of plant operations (Section 13, *Plant Operations*).

NSP will continue to identify changes to the quality organization and their responsibilities in Appendix D of the OQAP, as well as other significant organizational or responsibility changes.

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Attachment 1

Proposed changes to revision 17 of the Operational Quality Assurance Plan are shown in this attachment. Deletions to the OQAP are shown as strikeouts and the proposed changes are underlined (except for Fig. 1). The page numbers listed below apply to the page numbers in revision 17 of the OQAP.

<u>Page(s)</u>	<u>Section</u>
7 MTO 5/23/94	3.2
8 X-21	3.3
22	Figure 1

3.0 Organization

3.1 General Requirements

1. NSP shall be responsible for the establishment and execution of the Operational Quality Assurance Program. NSP may delegate to other organizations the work of establishing and executing the Operational Quality Assurance Program, or any part thereof, but shall retain responsibility therefor.
2. The authority and duties of persons and organizations performing quality assurance functions shall be clearly established and delineated in writing. Such persons and organizations shall have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions.
3. Assurance of quality requires management measures which provide that the individual or group assigned the responsibility for checking, auditing, inspecting, or otherwise verifying that an activity has been correctly performed is independent of the individual or group directly responsible for performing the specific activity.

3.2 Organization Summary ~~Quality Organization Summary~~

Figure 1, NSP Organization with Operational Responsibilities, presents an organizational chart of NSP showing a summary of functional responsibilities.

- ~~1. The Quality Assurance Department is responsible for the overall administration of the Operational Quality Assurance Program. Specific responsibilities are stated in Section 3.3.1.1.1 and its subsections.~~
- ~~2. The Site Quality Section for each nuclear site is responsible for the administration of the site quality assurance program and quality control of site activities. Specific responsibilities are stated in Section 3.3.1.1.1.3.~~
- ~~3. The Materials & Special Processes Section of the Operations and Maintenance Support Department is responsible for providing technical support for the quality control of special processes at the nuclear plants. Specific responsibilities are stated in Section 3.3.1.4.1.1.~~

~~3.3 Corporate Organization With Operational Quality Assurance Program Responsibilities~~

~~3.3.1 President NSP Generation~~

~~This position is responsible for NSP activities, within NSP Generation, associated with operating nuclear plants. This responsibility is implemented by assigning responsibility to the corporate officers of the company (See Figure 17, Corporate Organization With Operational QA Responsibilities, Page 22). Responsibilities include:~~

- ~~1. Engineering, construction and operation of all generating facilities.~~

~~Positions reporting to the President NSP Generation include: Vice President Nuclear Generation, Director Business Planning and Support, Director Financial Support, Director Support Services, and Manager Fuel Resources.~~

~~3.3.1.1 Vice President Nuclear Generation~~

~~This position is designated by the President & Chief Operating Officer and the President NSP Generation as responsible for the establishment and implementation of an Operational Quality Assurance Program and the operation and physical control of the company's nuclear generating facilities. Responsibilities include:~~

- ~~1. Operation of nuclear facilities.~~
- ~~2. Maintenance of nuclear facilities.~~
- ~~3. Modification of nuclear facilities.~~
- ~~4. Nuclear facility fuel utilization.~~
- ~~5. Operational review of new nuclear facility design.~~
- ~~6. Independent review and audit of nuclear plant operations and operating license administration.~~
- ~~7. Training Support for all NSP personnel working at the nuclear power plants.~~
- ~~8. Providing overall direction and support to nuclear site management in matters of staffing and employee qualifications.~~

~~9. Providing emergency preparedness management.~~

~~10. Establishment of an Operational Quality Assurance Plan that governs activities associated with Federal Regulation (10CFR50, Appendix B).~~

~~11. Establishment of Corporate Nuclear Administrative Control Directives that identify quality assurance requirements and positions responsible for implementing those requirements.~~

~~12. Providing status reports to management.~~

~~Positions reporting to the Vice President Nuclear Generation include: Director Quality Assurance, General Manager Nuclear Site (Monticello and Prairie Island), Director Licensing and Management Issues, Safety Audit Committee Chairman (on matters relating to the Safety Audit Committee) and the Manager Nuclear Radiological Services.~~

~~3.3.1.1.1 Director Quality Assurance~~

~~This position is responsible for the establishment, maintenance and evaluation of the Operational Quality Assurance Program. Responsibilities include:~~

~~1. Controlling revisions to the Operational Quality Assurance Plan.~~

~~2. Stop work authority for nonconforming activities until the adverse conditions have been corrected.~~

~~3. Assisting other company organizations in implementing quality assurance program requirements.~~

~~4. Providing Quality Assurance status reports to appropriate levels of management.~~

~~Positions reporting to this Director include: Superintendent Supplier Quality Assurance, Manager Nuclear Operations Quality Assurance, Superintendent Site Quality (Monticello and Prairie Island).~~

~~3.3.1.1.1.1~~ ~~Manager Nuclear Operations Quality Assurance~~

~~This position is responsible for quality assurance activities associated with general office organizations and internal auditing. Responsibilities include:~~

- ~~1. Internal audits of all levels of the Operational Quality Assurance Program.~~
- ~~2. Review of Corporate Nuclear Administrative Control Directives and Corporate Nuclear Administrative Work Instructions.~~
- ~~3. Maintenance of Corporate Nuclear Administrative Control Directives and Corporate Nuclear Administrative Work Instructions current with corporate commitments and policies.~~
- ~~4. Program implementation monitoring and periodic trending.~~

~~3.3.1.1.1.2~~ ~~Superintendent Supplier Quality Assurance~~

~~This position is responsible for control of the supplier qualification program. Responsibilities include:~~

- ~~1. Inspections of nuclear fuel suppliers.~~
- ~~2. Quality assurance audits/source surveillances and qualification of suppliers of materials, equipment and services.~~
- ~~3. Quality assurance reviews of nuclear procurement made by general office organizations.~~
- ~~4. Preparation/review of internal quality assurance programs and procedures.~~

~~3.3.1.1.1.3~~ ~~Superintendent Site Quality (Monticello and Prairie Island)~~

~~These positions are responsible for the administration of Operational Quality Assurance Program requirements at the site. Responsibilities include:~~

- ~~1. Implementation of the site quality control inspection program (except ISI).~~

- ~~2. Review of inspection schedules (except ISI), procedures, and results (i.e., those associated with routine maintenance and modification activities, operational activities, technical services, radioactive material packages, emergency equipment, and fire protection).~~
- ~~3. Requesting audits of selected site level activities when determined that the audit will improve site program implementation.~~
- ~~4. Review of site Administrative Control Directives and Instructions.~~
- ~~5. Site program implementation monitoring and periodic trending.~~
- ~~6. Stop work authority for nonconforming activities at the site until adverse conditions have been corrected.~~
- ~~7. Providing site quality assurance status and trend reports to appropriate levels of management.~~
- ~~8. Monitoring contractor quality control activities.~~
- ~~9. Implementation of site surveillance program.~~
- ~~10. Quality Assurance review of site procurement documents.~~
- ~~11. Quality Assurance review of modifications & projects.~~
- ~~12. Maintaining and reporting the status of on site Quality Assurance Program implementation.~~

~~3.3.1.1.2 Director Licensing and Management Issues~~

~~This position is responsible for providing support to the nuclear plants in the areas of licensing administration, and safety audit and assessment. Responsibilities include:~~

- ~~1. Independent review functions for operating nuclear plants to verify compliance with operating license requirements as required by NRC regulations.~~
- ~~2. License administration for nuclear plants and liaison to the NRC Office of Nuclear Reactor Regulation.~~
- ~~3. Engineering and technical support to nuclear plants in nuclear safety and licensing areas.~~

~~3.3.1.1.3 General Manager Nuclear Site (Monticello and Prairie Island)~~

~~These positions are responsible for the overall management of nuclear site activities, and for ensuring compliance with regulatory requirements. Responsibilities include:~~

- ~~1. Review of plant operating abnormalities, problems, performance, malfunctions, etc., and concurrence in corrective actions.~~
- ~~2. Review of quality assurance status, trend and audit reports, and follow up of resolution to nonconformances.~~
- ~~3. Review of Safety Audit Committee reports and recommendations.~~
- ~~4. Performance of further actions as required to ensure safety.~~
- ~~5. Nondestructive examinations not associated with inservice inspection.~~
- ~~6. Development and implementation of the following programs:~~
 - ~~a. Material control including receipt inspection.~~
 - ~~b. Site quality assurance and control.~~
 - ~~c. Site physical security.~~
- ~~7. Technical manual control program.~~
- ~~8. Procurement of items and services for the nuclear site.~~

~~Positions reporting to these General Managers respectively include: Plant Manager, Manager Safety Assessment and Manager Nuclear Training (Monticello and Prairie Island).~~

~~3.3.1.1.3.1 Monticello and Prairie Island Plant Managers~~

~~These positions are responsible for ensuring that activities and operations comply with applicable regulatory requirements. Responsibilities include:~~

- ~~1. Responsibilities assigned by the operating license and the Corporate Nuclear Administrative Control Directives.~~
- ~~2. Plant managerial control system.~~
- ~~3. Plant operation and maintenance.~~
- ~~4. Plant staffing, including qualifications, hiring, training, discipline, and administration of the labor contracts.~~
- ~~5. Development and implementation of the following programs:~~
 - ~~a. Preventive maintenance.~~
 - ~~b. Surveillance.~~
 - ~~c. Operating, maintenance, and testing procedural systems.~~
 - ~~d. Fire protection.~~
 - ~~e. Operating experience assessment.~~
- ~~6. Coordination of activities performed by non-plant staff personnel with plant operation.~~
- ~~7. Operation and maintenance of the independent spent fuel storage installation (Prairie Island only).~~

~~3.3.1.1.3.2 Manager Safety Assessment~~

~~This position is responsible for the management of site design documentation.~~

~~3.3.1.1.3.3~~ ~~Manager Nuclear Training (Monticello and Prairie Island)~~

~~These positions are responsible for the training of NSP employees at the sites. Responsibilities include:~~

- ~~1. Providing NRC Reactor Operator and Senior Reactor Operator license training programs.~~
- ~~2. Providing requested training for NSP personnel working at nuclear plants.~~
- ~~3. Providing required training to personnel temporarily working at nuclear plants.~~
- ~~4. Managing and operating simulator facilities.~~
- ~~5. Providing requested support for NSP internal nuclear plant training.~~
- ~~6. Maintaining required training records.~~
- ~~7. Providing fire protection training.~~
- ~~8. Maintaining INPO accredited training programs.~~

~~3.3.1.1.4~~ ~~Manager Nuclear Radiological Services~~

~~This position is responsible for providing support to the nuclear plants in the areas of radiation protection, chemistry, emergency planning and radiation environmental monitoring. Responsibilities include:~~

- ~~1. Providing a corporate radiation protection support program.~~
- ~~2. Providing a corporate nuclear chemistry support program (BWR and PWR).~~
- ~~3. Administering NRC operating licenses and technical specifications for radiological environmental activities.~~
- ~~4. Reviewing, coordinating and evaluating company emergency preparedness and radiological environmental activities required by the NRC.~~

~~5. Conducting a radiological environmental monitoring program to comply with NRC requirements.~~

~~6. Reviewing proposed and revised regulations related to radiation protection, chemistry, emergency preparedness and radiological environmental activities.~~

~~3.3.1.1.5 Safety Audit Committee (SAC) Chairman~~

~~This position is appointed by and responsible to the Vice President Nuclear Generation. This position is normally an NSP Manager. Responsibilities include:~~

- ~~1. The overall administration of the SAC.~~
- ~~2. Appointing SAC members.~~

~~3.3.1.2 Director Business Planning & Support~~

~~This position's responsibilities include:~~

- ~~1. Developing corporate positions on legislative and regulatory issues, other than NRC actions, which may impact nuclear operations.~~

~~3.3.1.3 Director Financial Support~~

~~This position's responsibilities include:~~

- ~~1. Financial operations of NSP Generation~~

~~3.3.1.4 Director Support Services~~

~~This position is responsible for providing technical support and drafting services to the nuclear sites. Responsibilities include:~~

- ~~1. Support of nuclear plant maintenance program.~~
- ~~2. Providing nuclear project management, engineering and construction services.~~
- ~~3. Drawing Control~~
- ~~4. Providing technical consultation on projects and issues which affect nuclear generation.~~

~~Positions reporting to this Director include: Manager Nuclear Projects and Manager Operations and Maintenance Support.~~

~~3.3.1.4.1 Manager Operations and Maintenance Support~~

~~This position's responsibilities include:~~

- ~~1. Assisting in securing maintenance contracts.~~
- ~~2. Providing materials and special process controls.~~
- ~~3. Providing technical support and counsel in assigned areas.~~

~~Positions reporting to this Manager include: Superintendent Materials & Special Processes.~~

~~3.3.1.4.1.1 Superintendent Materials & Special Processes~~

~~This position is responsible for activities associated with special processes, inservice inspection and technical support in areas of quality control for special processes and material properties. Responsibilities include:~~

- ~~1. Developing, preparing, and distributing welding, heat treating and nondestructive examination procedures.~~
- ~~2. Certifying personnel in welding and nondestructive examination and maintaining qualification records.~~
- ~~3. Developing, implementing, and documenting an Inservice Inspection Examination Program in assigned areas for nuclear plants.~~
- ~~4. Providing technical support to plants in the areas of metallurgy, ASME Boiler Codes, welding, heat treating and nondestructive examination.~~
- ~~5. Providing technical instruction in welding and other special processes as required.~~

~~3.3.1.4.2~~ ~~Manager Nuclear Projects~~

~~This position is responsible for the execution of projects assigned to Nuclear Projects and for providing craft labor when requested. Responsibilities include:~~

- ~~1. Design, manufacture, fabrication, construction, installation, and preoperational testing of modification projects.~~
- ~~2. Implementation of assigned on-going projects at nuclear plants.~~
- ~~3. Providing technical support.~~
- ~~4. Performing assigned responsibilities for maintenance activities.~~
- ~~5. Providing craft labor.~~
- ~~6. Performing engineering studies.~~

~~3.3.1.5~~ ~~Manager Fuel Resources~~

~~This position is responsible for procurement functions of fuel for the commercial generating plants. Responsibilities include:~~

- ~~1. Coordinating and managing, as applicable, the storage, shipment and disposal of spent fuel, low level waste, and high level waste for NSP.~~
- ~~2. Nuclear fuel procurement.~~
- ~~3. Core and nuclear safety analysis for nuclear plants.~~
- ~~4. Licensable reload core designs for nuclear plants.~~
- ~~5. Technical expertise, information and direction to the Licensing and Management Issues Department to ensure licensability of reload core designs, and to ensure adequacy of technical specifications.~~
- ~~6. Technical expertise, information and direction in the formulation, coordination and implementation of reload designs, vendor evaluations and vendor contract negotiations.~~

~~7. Technical expertise and direction to the Quality Assurance Department to ensure that nuclear fuel meets company and regulatory agency requirements.~~

~~8. Feedback and technical expertise to the Nuclear Training Department to ensure that necessary expertise, information and computer physics models are available for training.~~

~~3.3.2 President & Chief Operating Officer~~

~~This position is responsible for NSP activities, outside NSP Generation, associated with operating nuclear plants. This responsibility is implemented by assigning responsibility to the corporate officers of the company. (See Figure 1, Corporate Organization With Operational QA Responsibilities, Page 22).~~

~~Positions reporting to the President & Chief Operating Officer include: Vice President Customer Operations, Vice President Human Resources and General Manager Supply & Operations Services.~~

~~3.3.2.1 Vice President Customer Operations~~

~~This position is responsible for the planning, design, construction, operation and maintenance of the transmission system.~~

~~Positions reporting to this Vice President include: General Manager System Operations and General Manager Substation/Transmission Services.~~

~~3.3.2.1.1 General Manager System Operations~~

~~This position is responsible for operation of the company's electrical system. Responsibilities include:~~

- ~~1. Coordinating electrical transmission system operation with generating facility operation.~~

~~Positions reporting to this General Manager include: Manager System Control.~~

~~3.3.2.1.1.1~~ ~~Manager System Control~~

~~This position's responsibilities include:~~

- ~~1. Coordination and supervision of the operation of NSP's generating and transmission system.~~
- ~~2. Coordination of planned transmission line and generating unit outages.~~

~~3.3.2.1.2~~ ~~General Manager Substation/Transmission Services~~

~~This position is responsible for the design, engineering, construction and maintenance of the transmission system. Responsibilities include:~~

- ~~1. Performance of maintenance on plant electrical equipment and the electrical transmission system.~~
- ~~2. Electrical construction testing services for nuclear power plants.~~

~~Positions reporting to this General Manager include Manager Electric Maintenance & Protection.~~

~~3.3.2.1.2.1~~ ~~Manager Electric Maintenance & Protection~~

~~This position's responsibilities include:~~

- ~~1. Providing administration, supervision, and technical expertise to facilitate maintenance and testing of NSP equipment including battery capacity testing.~~
- ~~2. Providing for the maintenance, proper application and functioning of all relay protection, control, energy management, system computer, communication and telemetering equipment, including electrical construction testing, at substations, power plants and control centers.~~

~~3.3.2.2~~ ~~General Manager Supply & Operations Services~~

~~This positions's responsibilities include:~~

- ~~1. Procurement and material management for NSP.~~

~~2. Testing Laboratory services.~~

~~Positions reporting to this General Manager include: Manager Material Services and Manager Procurement Services.~~

~~3.3.2.2.1 Manager Material Services~~

~~This position's responsibilities include:~~

- ~~1. Developing and preparing NDE and Testing Laboratory procedures.~~
- ~~2. Certifying Testing Laboratory personnel and maintaining qualification records.~~
- ~~3. Providing chemical, nondestructive examination and physical testing and inspection services including air filter testing.~~

~~3.3.2.2.2 Manager Procurement Services~~

~~This position is responsible for NSP procurement and material management functions for material, equipment and services.~~

~~3.3.2.3 Vice President Human Resources~~

~~This position's responsibilities include:~~

- ~~1. Provide management for NSP Corporate Security Program.~~

~~Positions reporting to this Vice President include: Manager Security Services.~~

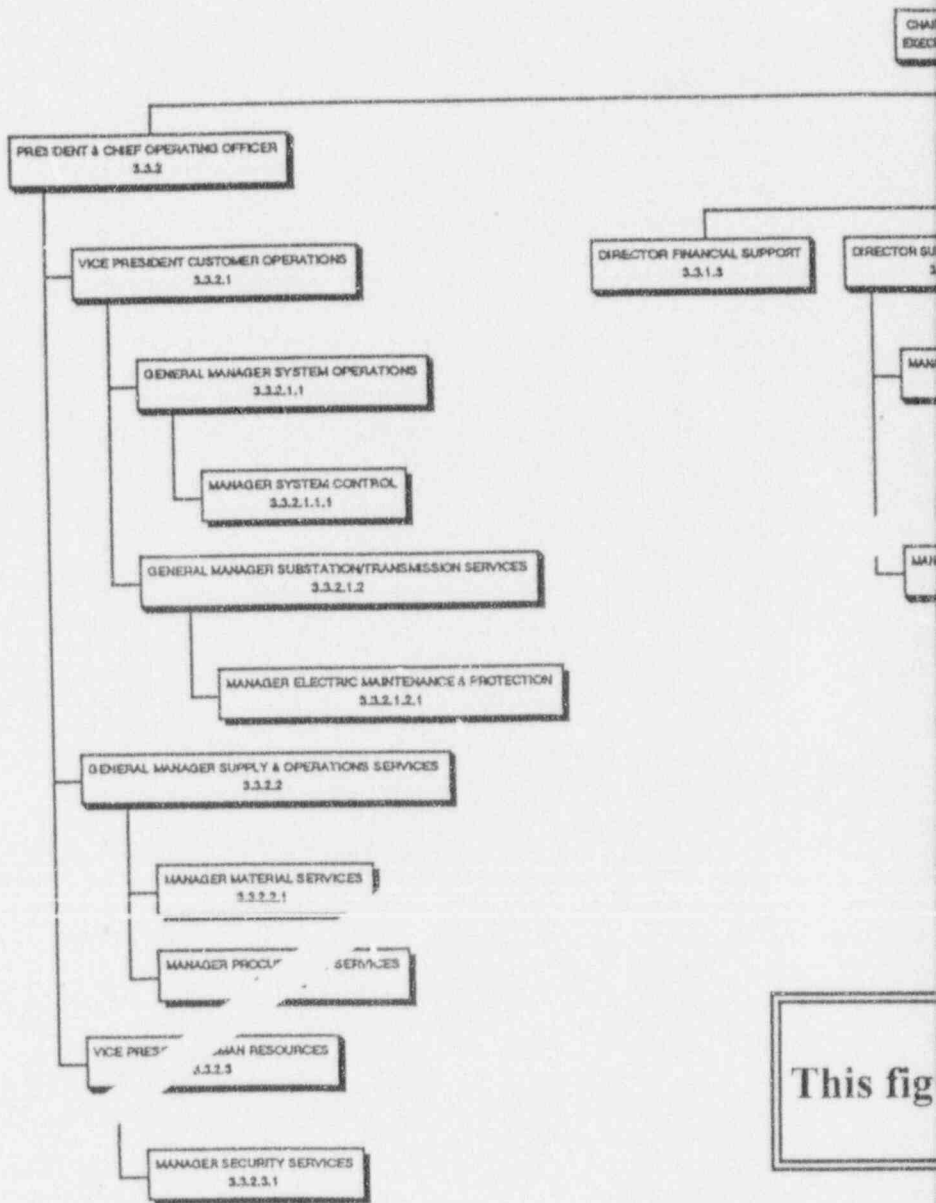
~~3.3.2.3.1 Manager Security Services~~

~~This position's responsibilities include:~~

- ~~1. Implementation of the company's security program, which includes providing trained security personnel at non-nuclear plants.~~
- ~~2. Nuclear Access Authorization, general employee screening, investigations and other related security services.~~
- ~~3. Development and implementation of Nuclear Generation's Fitness for Duty Program.~~

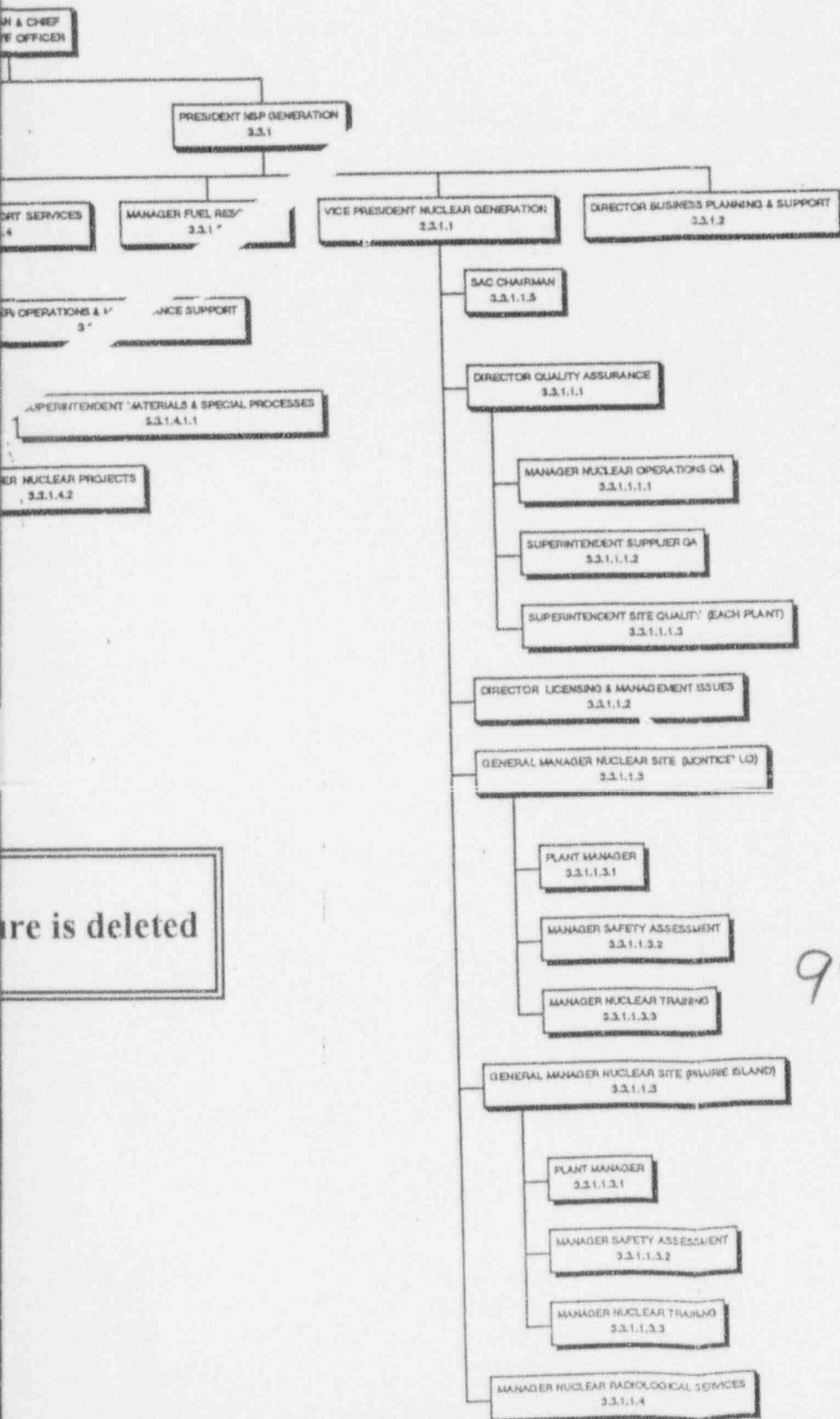
- ~~4. Guard force staffing and supervision at nuclear plants.~~
- ~~5. Providing required training to security personnel at nuclear plants.~~

FIGURE 3.3
CORPORATE ORGANIZATION WITH
NOTE: NUMBERS IN
SECTIONS DESCRIBE



RE 1:
OPERATIONAL QA RESPONSIBILITIES

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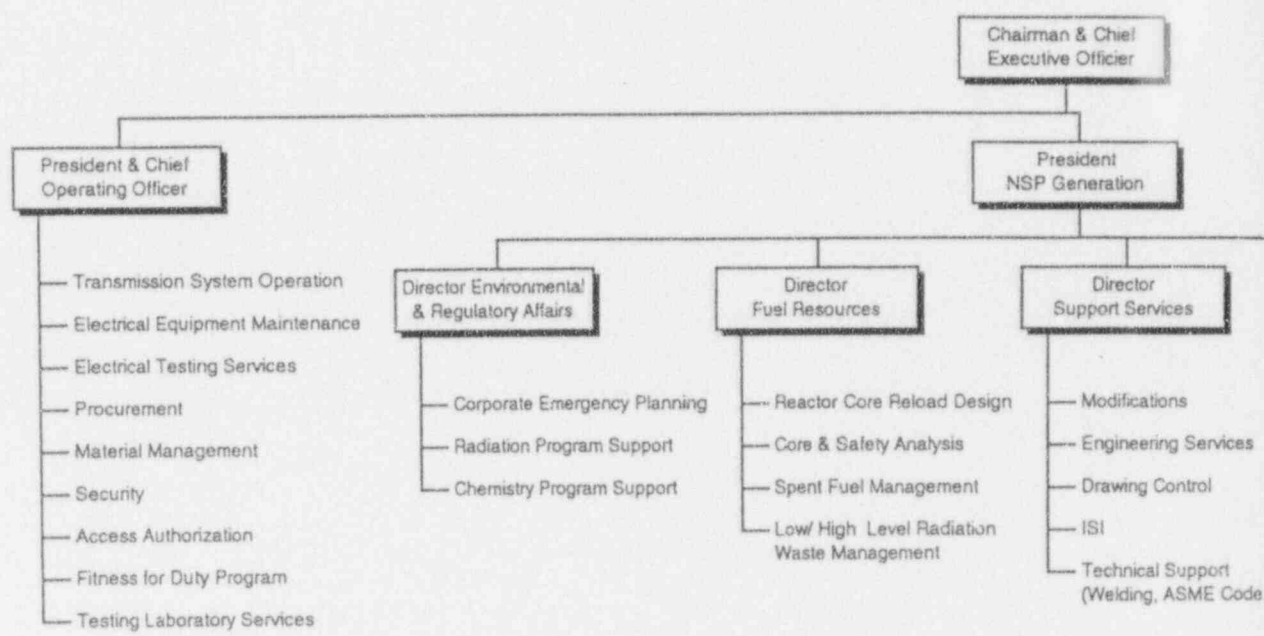


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Also Available on
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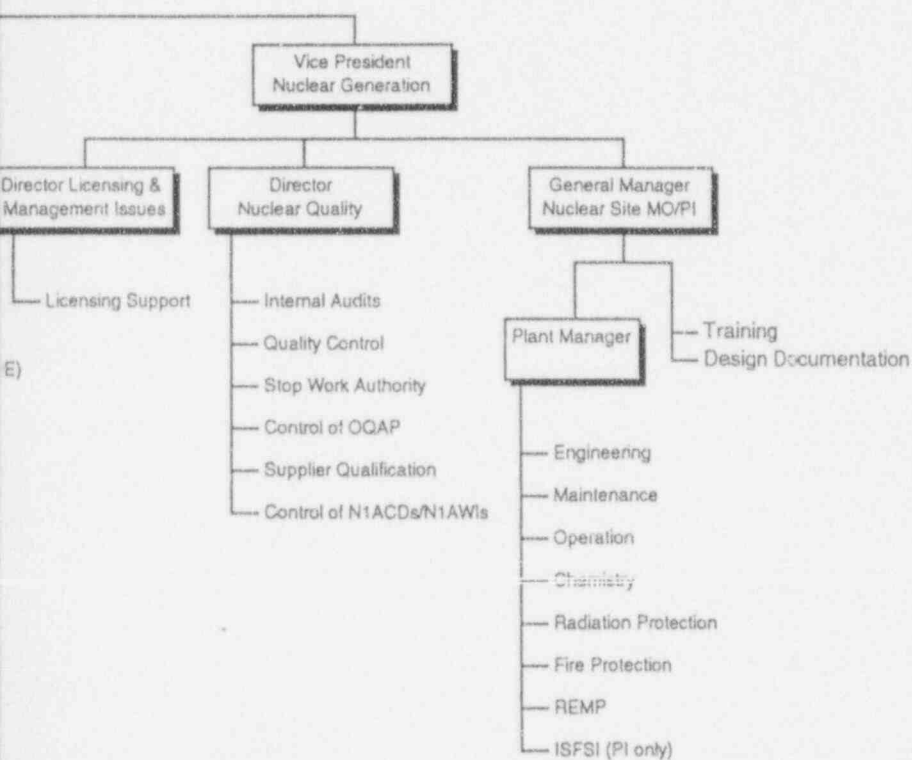
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NOTE: The organization displayed is for revision 18 of the OQAP, not the organization of revision 17. This note will not appear on the original figure included in OQAP, revision 18.

1 Quality Assurance Responsibilities



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