1. Identification of Change

Page 17.2-2

Reason for Change

This change was made to clarify the fact that operational organizations working under the Operating Quality Assurance Program will be performing work activities to support construction.

Basis for Concluding that the Revised Program Satisfies 10CFR50 Appendix B

Both the SNUPPS Quality Assurance Program for Safety-Related Design and Construction activities and the Wolf Creek Operating Quality Assurance Program satisfy the requirements of Appendix B.

the KG&E startup forces, and subsequently the operating forces, will start out conducting their activities under the systems of control which comprise the OQAP, and thus the need to shift from the Design and Construction QA Program to the OQAP will be eliminated.

Construction organizations committed to the requirements of the Design and Construction QA Program may provide quality related activities to organization(s) committed to the requirements of the OQAP (e.g. procurement and receipt inspection). A description of the QA Program elements controlling these activities can be found in the appropriate section(s) of the SNUPPS QA Programs for Design and Construction Manual. The construction organization providing the safety-related activity for the operations/startup applications shall assure that all personnel are qualified in accordance with the Design and Construction QA Program qualification requirements. Both KG&E Construction and Operations shall be responsible for establishing procedures to control the interface between the construction organization(s) providing the activity and the using organization(s). 1.

Included within the OQAP are the development, control and use of computer code programs. The Nuclear Plant Engineering Division, Nuclear Services Division, and the Plant Staff are responsible for the computer programs used internally. Internal activities associated with verification, documentation, and use of computer programs, utilized in safety-related analyses, are accomplished in accordance with documented procedures. Verification that the procedures are being followed and are effective in controlling computer program use is provided by internal audits by the QA Division. Assurance that external organizations are controlling activities associated with computer programs used for safety-related analysis is provided through the supplier qualification process, through imposition of requirements in purchase orders and contracts and/or through audits.

17.2.0.4 Special Scope Programs

In controlling activities to the extent consistent with their effect on safety, KG&E formally designates and applies selected quality requirements to fire protection, environmental control, and security. Although not strictly safety-related, the applicable QA controls applied to these special scope programs are described as follows:

| | |
|---|---|
| Fire Protection | See Appendix 9.5A of the SNUPPS Standard Plant FSAR and Table 9.5-1, WC addenda. |
| Environmental Controls | See Section 13.5.2.2.8 |
| Site Security | See WCGS Physical Security Plan |

2. Identification of Change

Pages 17.2-3 (Sections 17.2.1.2, 17.2.1.2a, 17.2.1.3),
17.2-4 (Sections 17.2.1.3a), 17.2-5a, 17.2-6,
and 17.2-8 (paragraph 1)
Figures 17.2-1 and 17.2-2

Reason for Change

The revised pages update the organizational description and titles of KG&E personnel.

Basis for Concluding that the Revised Program Satisfies 10CFR50 Appendix B

The revised organization description provides delineation of the authority and duties of positions performing activities affecting the safety-related functions of structures, systems and components. The organizational elements performing quality assurance functions maintain sufficient authority and independence as required by Appendix B.

## 17.2.1 ORGANIZATION

### 17.2.1.1 Scope

KG&E has established an organizational structure for quality assurance activities. This section identifies the organizational structure; management positions and responsibilities; and delegation of authority for the development, implementation, and maintenance of the OQAP. KG&E shall retain responsibility for the establishment and execution of the OQAP, although certain program activities may be delegated to others. The organizational structure of KG&E's top management is shown in Figure 17.2-1. The organizational structure responsible for implementing the OQAP is shown in Figure 17.2-2. The organization of the WCGS staff is shown in Figure 13.1-1.

### 17.2.1.2 President and Chairman of the Board

1.

The President and Chairman of the Board is responsible for promulgating quality assurance program requirements. He has responsibility for quality assurance, engineering, procurement, construction, and operation of the WCGS. He endorses KG&E's Quality Assurance policy statement and delegates the authority necessary to implement this policy. He directs all KG&E employees who work in direct support of nuclear operations activities or interface with nuclear operations to comply with the OQAP.

### 17.2.1.2a Group Vice President - Technical Services

The Group Vice President - Technical Services reports directly to the President and Chairman of the Board. The duties and responsibilities of the Group Vice President - Technical Services include being in charge of all technical aspects of Kansas Gas and Electric Company. These technical aspects encompass operations, transmission and distribution, engineering and construction. This includes the construction and operation phases of WCGS.

2.

### 17.2.1.3 Vice President - Nuclear

The Vice President - Nuclear, under the direction of the Group Vice President - Technical Services is responsible for the implementation of KG&E's Quality Assurance Policy and the Quality Assurance Programs which devolve from this policy. He authorizes staffing of the QA Division, the WCGS, and the engineering and services divisions which support the WCGS. He is responsible for directing activities which support the design, construction, and operation of the WCGS and for coordinating supportive activities performed by other internal and external groups which are not under his direct administrative control. He has corporate responsibility for the operation, physical control, and security of the WCGS.

2.

17.2.1.3a Nuclear Coordinator

The Nuclear Coordinator reports directly to the Vice President-Nuclear and is responsible for providing administrative and technical assistance to the Vice President - Nuclear. The Nuclear Coordinator is also the "contact person" for activities involving the Institute of Nuclear Power Operations (INPO). 2.

17.2.1.4 Manager Quality Assurance

The Manager Quality Assurance, who reports directly to the Vice President - Nuclear, devotes full attention to QA matters. He is responsible for assuring the development and implementation of the QQAP. The Manager Quality Assurance is responsible for staffing the QA Division and for assuring QA personnel are adequately trained and experienced to perform their assigned tasks. He carries out the directives of the Quality Assurance Committee and provides the Committee with information related to the effectiveness of the QQAP. His qualifications include: A bachelor degree in Engineering or related sciences, six years of professional level experience in Nuclear Quality Assurance or six years of supervisory experience plus two years of Nuclear Quality Assurance experience. 3.

17.2.1.4.1 Manager Quality Assurance (WCGS)

The Manager Quality Assurance (WCGS), who reports to the Manager Quality Assurance, devotes full attention to QA matters. He is responsible for verifying that an adequate QA program is developed and implemented for safety-related activities which occur at the WCGS. The Manager Quality Assurance (WCGS) is assigned [work location] to the Wolf Creek site. He maintains a staff and provides them with technical and administrative direction. He is responsible for establishing and implementing a comprehensive plant site audit program. The qualifications of the Manager Quality Assurance (WCGS) are a Bachelor's Degree in Engineering or related science and at the time of initial core loading or appointment to the position and will have four years experience in the field of quality assurance or equivalent number of years of nuclear plant experience or combination of the two, at least one year shall be nuclear power plant quality assurance implementation experience. 3 3

17.2.1.4.2 Quality Assurance Coordinator 3

The Quality Assurance Coordinator reports to the Manager Quality Assurance and is responsible for verifying that an adequate QA program is developed and implemented for safety-related activities which occur at the corporate office and other locations remote from the WCGS. He maintains a staff and provides them with technical and administrative direction. He is responsible for establishing and implementing a comprehensive audit program for offsite activities of KG&E, and

17.2.1.7.2 Startup Manager

The Startup Manager reports to the Director Nuclear Operations and is responsible for the overall direction and administration of the functions and activities required to conduct the WCGS startup program. Chapter 14.0 presents a description of the Startup Organization and delineates the Startup Manager's responsibilities. When the startup program has concluded, the Startup Organization will be dissolved.

17.2.1.7.3 Manager Nuclear Training

The Manager Nuclear Training reports to the Director Nuclear Operations and is responsible for the overall training activities of the Nuclear Department. He is responsible for insuring training staff qualifications, including reviewing instructor evaluation records with the Training Supervisor. He is responsible for reviewing the content of training programs for technical completeness and compliance with regulatory standards. He is also responsible for auditing the quality of on-site training programs. The Manager Nuclear Training is also responsible for training programs for Corporate office personnel involved in support of WCGS during normal operations, preparedness for response to off-normal incidents, and long-term recovery programs.

17.2.1.8 Director - Purchasing

The Director - Purchasing reports administratively to the Group Vice President - Administration who reports to the President and Chairman of the Board. The Director - Purchasing also has reporting responsibilities to the Group Vice President - Technical Services for materials, systems, components and parts (not delegated to outside organizations) that are needed to support WCGS. He is responsible for issuing purchase orders and contracts, for the commercial content of those documents, the financial/commercial qualification of vendors, and for processing invoices. 2.

17.2.1.9 Quality Assurance Committee (QAC)

KG&E has established a Quality Assurance Committee (QAC). The prime responsibility of this committee is to measure the effectiveness of KG&E's OQAP and initiate changes when warranted. The permanent members of this Committee are the Vice President-Nuclear, Vice President-Engineering, Legal Counsel, Superintendent Production Fossil Plants and the Director Nuclear Operations.

In carrying out their responsibilities, the members of the Quality Assurance Committee shall utilize information received from internal audit reports; audit reports of other organizations supplying services or materials which are important to safety; summaries of nonconformance reports, corrective action reports, and NRC I&E inspection reports and notices of violation, if any.

The QAC shall meet at least once during each calendar quarter. The chairman of the committee is the Vice President-Nuclear, who may call additional meetings as necessary. The committee will not concern itself with minor isolated QA problems but will take a broad overview of KG&E's OQAP and make decisons which will provide meaningful adjustments to the OQAP. The committee will review deficiencies and will establish actions or affirm that adequate corrections are being made.

Notices of violation received from the NRC and responses made to the NRC which are quality related shall be reviewed by members of the QAC. The Chairman will assign the responsibility for preparing reports to be sent to the NRC and will review and issue all such reports.

17.2.1.10 Safety Review Committees

Safety review committees shall be established at the WCGS (the Plant Safety Review Committee) and at the KG&E General Office (the Nuclear Safety Review Committee) to provide independent review of those items required by the WCGS Technical Specifications. Committee membership and duties are described in the Administrative Controls Section of the Technical Specifications.

1. Quality Assurance Policy

   The governing policy statement of the OQAP is approved by the President and Chairman of the Board (at the time of policy issuance, this individual was President and Chief Operating Officer) and is contained in the Operating QA Manual.

2. Operating Quality Assurance Program Manual

   The OQAP Manual contains a delineation of quality assurance requirements and assigned responsibilities. The distribution of this manual and revisions thereto is performed by the General Office QA Staff. The Manager Quality Assurance is responsible for the content of the manual and approves changes which are submitted to the NRC for review and acceptance.

3. Wolf Creek Project Policy Manual (WCPPM)

   The WCPPM defines project policy relative to the management of the Wolf Creek Project. Specific responsibilities and authorities are defined for the various individuals and organizations involved. The manual also contains general procedures which are applicable to all KG&E personnel assigned to the project. This manual and changes thereto are approved and issued by the Vice President-Nuclear.

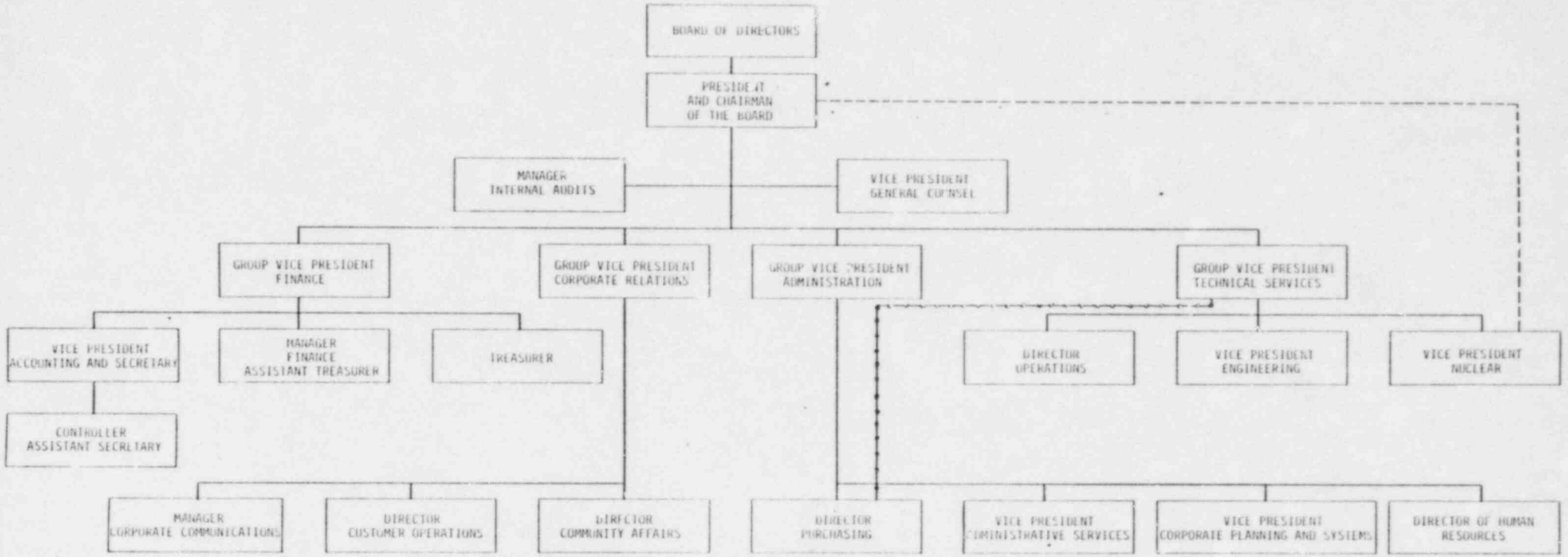
4. Procedures Manuals

   The WCGS Procedure Manuals and the KG&E Procedures Manual provide control for KG&E activities covered by the OQAP.

Table 17.2-1 shows a listing of controlled procedure manuals. These manuals contain mandatory requirements which must be implemented by responsible organizations and individuals.

Table 17.2-2 lists areas of OQAP implementing procedural coverage and indicates the related criteria of 10 CFR 50, Appendix B, covered by each area. This listing represents general areas of procedural coverage. Provisions for procedure consolidation, separation, deletions, additions, or minor program changes do not permit including an absolute listing of implementing procedures.

Table 17.2-3 lists QA Program commitments to Regulatory Guides and endorsed codes and standards.




KEY

—— Administrative direction

--- For matters of an immediate nature, the Vice President-Nuclear communicates directly with the President/Chairman of the Board

-•- For matters relating to nuclear procurement the Director Purchasing reports to the Group Vice President - Technical Services

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**WOLF CREEK GENERATING STATION**
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**FINAL SAFETY ANALYSIS REPORT**

FIGURE 17.2-1

KG&E CORPORATE ORGANIZATION

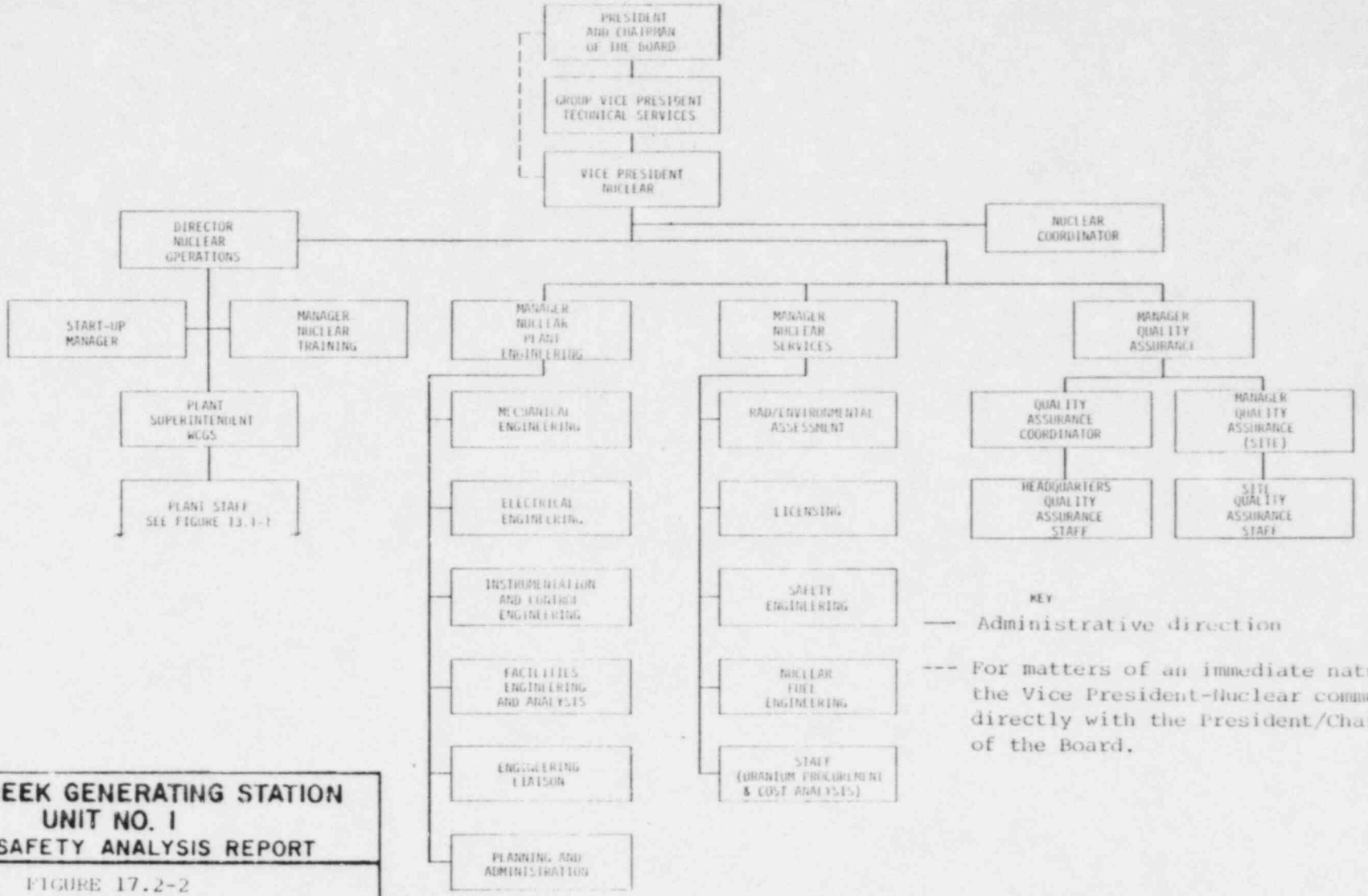


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FIGURE 17.2-2

KG&E ORGANIZATION FOR
NUCLEAR OPERATIONS

3. Identification of Change

Pages 17.2-4 (Sections 17.2.1.4, 17.2.1.4.1, 17.2.1.4.2) and 17.2-4a

Reason for Change

These revised sections correct titles and incorporate a commitment made in response to an NRC Quality Assurance Branch question.

Basis for Concluding that the Revised Program Satisfies 10CFR50 Appendix B

The commitment is unchanged and only titles of certain personnel needed to be corrected.

17.2.1.3a Nuclear Coordinator

The Nuclear Coordinator reports directly to the Vice President-Nuclear and is responsible for providing administrative and technical assistance to the Vice President - Nuclear. The Nuclear Coordinator is also the "contact person" for activities involving the Institute of Nuclear Power Operations (INPO). 2.

17.2.1.4 Manager Quality Assurance

The Manager Quality Assurance, who reports directly to the Vice President - Nuclear, devotes full attention to QA matters. He is responsible for assuring the development and implementation of the OQAP. The Manager Quality Assurance is responsible for staffing the QA Division and for assuring QA personnel are adequately trained and experienced to perform their assigned tasks. He carries out the directives of the Quality Assurance Committee and provides the Committee with information related to the effectiveness of the OQAP. His qualifications include: A bachelor degree in Engineering or related sciences, six years of professional level experience in Nuclear Quality Assurance or six years of supervisory experience plus two years of Nuclear Quality Assurance experience. 3.

17.2.1.4.1 Manager Quality Assurance (WCGS)

The Manager Quality Assurance (WCGS), who reports to the Manager Quality Assurance, devotes full attention to QA matters. He is responsible for verifying that an adequate QA program is developed and implemented for safety-related activities which occur at the WCGS. The Manager Quality Assurance (WCGS) is assigned [work location] to the Wolf Creek site. He maintains a staff and provides them with technical and administrative direction. He is responsible for establishing and implementing a comprehensive plant site audit program. The qualifications of the Manager Quality Assurance (WCGS) are a Bachelor's Degree in Engineering or related science and at the time of initial core loading or appointment to the position and will have four years experience in the field of quality assurance or equivalent number of years of nuclear plant experience or combination of the two, at least one year shall be nuclear power plant quality assurance implementation experience. 3. 3.

17.2.1.4.2 Quality Assurance Coordinator

The Quality Assurance Coordinator reports to the Manager Quality Assurance and is responsible for verifying that an adequate QA program is developed and implemented for safety-related activities which occur at the corporate office and other locations remote from the WCGS. He maintains a staff and provides them with technical and administrative direction. He is responsible for establishing and implementing a comprehensive audit program for offsite activities of KG&E, and 3.

KG&E's suppliers, consultants, and agents. He coordinates quality verification activities with other KG&E departments and with external QA organizations. The qualifications of the Quality Assurance Coordinator are at least equivalent to those of an Audit Team Leader as set out in KG&E's procedures.

17.2.1.4.3 Stop Work Authority

The Manager Quality Assurance is authorized by the Vice President - Nuclear to stop work on ongoing quality activities which do not comply with established requirements. For onsite activities, this authority is delegated to the Manager Quality Assurance (WCGS) by the Manager Quality Assurance. During the operating phase, these personnel have the authority to stop unsatisfactory work during repair, maintenance, and refueling activities and the authority to recommend to the Plant Superintendent stop work affecting the continuation of plant operation. Other stop work authority evolving from hold points, witness points, and mandatory reviews and approval will be delineated in procedures. The continuation of an activity which would preclude identification and correction or increase the extent of the deficiency is subject to stop-work action by the Quality Assurance Division. | 3

4. Identification of Change

Page 17.2-7a

Reason for Change

The procedure for submitting Operating Quality Assurance Program changes has been revised to be consistent with the recent NRC rulemaking concerning changes to Quality Assurance Programs.

Basis for Concluding that the Revised Program Satisfies 10CFR50 Appendix B

The change was made in reaction to the recent NRC rulemaking concerning changes to Quality Assurance Programs.

The WCGS design and construction activities preceding implementation of the OQAP are governed by the Quality Assurance Program described in Section 17.1 of the Standard Plant PSAR and the Wolf Creek PSAR Addendum.

Commencing with the issuance of an operating license, changes to the OQAP shall be submitted to the NRC at least annually. If any such change reduces the commitments previously made, NRC approval must be obtained prior to implementation. 4.

17.2.2.4 OQAP Documentation

Consistent with the schedule for accomplishing operations phase activities, the OQAP shall be established and documented. The OQAP shall be documented as follows to meet program objectives:

5. Identification of Change

Page 17.2-8 (paragraph 4)

Reason for Change

The KG&E Procedures Manual provides control for some onsite as well as offsite activities.

Basis for Concluding that the Revised Program Satisfies 10CFR50 Appendix B

Safety-related procedures incorporate applicable requirements of Appendix B, irregardless of the manual in which they are contained.

1. Quality Assurance Policy

   The governing policy statement of the OQAP is approved by the President and Chairman of the Board (at the time of policy issuance, this individual was President and Chief Operating Officer) and is contained in the Operating QA Manual. 2.

2. Operating Quality Assurance Program Manual

   The OQAP Manual contains a delineation of quality assurance requirements and assigned responsibilities. The distribution of this manual and revisions thereto is performed by the General Office QA Staff. The Manager Quality Assurance is responsible for the content of the manual and approves changes which are submitted to the NRC for review and acceptance.

3. Wolf Creek Project Policy Manual (WCPPM)

   The WCPPM defines project policy relative to the management of the Wolf Creek Project. Specific responsibilities and authorities are defined for the various individuals and organizations involved. The manual also contains general procedures which are applicable to all KG&E personnel assigned to the project. This manual and changes thereto are approved and issued by the Vice President-Nuclear.

4. Procedures Manuals

   The WCGS Procedure Manuals and the KG&E Procedures Manual provide control for KG&E activities covered by the OQAP. 5.

Table 17.2-1 shows a listing of controlled procedure manuals. These manuals contain mandatory requirements which must be implemented by responsible organizations and individuals.

Table 17.2-2 lists areas of OQAP implementing procedural coverage and indicates the related criteria of 10 CFR 50, Appendix B, covered by each area. This listing represents general areas of procedural coverage. Provisions for procedure consolidation, separation, deletions, additions, or minor program changes do not permit including an absolute listing of implementing procedures.

Table 17.2-3 lists QA Program commitments to Regulatory Guides and endorsed codes and standards.

6. Identification of Change

Pages 17.2-35, 17.2-44, 17.2-45, and 17.2-46

Reason for Change

This change provides additional information concerning the role of the Quality Control organization in the area of special processes.

Basis for Concluding that the Revised Program Satisfies 10CFR50 Appendix B

The revised pages incorporate a commitment made in response to an NRC Quality Assurance Branch question.

## 17.2.9 CONTROL OF SPECIAL PROCESSES

### 17.2.9.1 Scope

Special processes are those fabrications, tests, and final preparation processes which require the qualification of procedure, technique, and personnel and which are performed in accordance with applicable codes and standards. Special processes normally require interim in-process controls in addition to final inspection to assure quality.

Special processes include such activities as welding, heat treating, nondestructive examination, application of coatings, and chemical cleaning and shall be accomplished under controlled conditions by qualified personnel in accordance with the technical requirements of applicable codes, standards, specifications, or other special requirements. Procedures detailing special processes shall be qualified in accordance with applicable codes and standards or, where no appropriate standards exist, to KG&E requirements. The qualification of processes and personnel shall be documented and maintained.

### 17.2.9.2 Procedural Control

Plant procedures shall prescribe the requirements for the qualification of KG&E procedures, personnel, and equipment. The involvement of the QA organization in the control of special processes includes the review of plant procedures for the adequate inclusion of quality requirements. The QC organization directly performs NDE, or performs surveillances on the work of others who provide NDE services. They also inspect other special process activities conducted by the plant maintenance staff and contractors. Special process equipment that may require periodic adjustment and whose performance cannot be verified through direct monitoring of appropriate parameters shall be subject to the controls described in Section 17.2.12. Qualification records shall be maintained current. The Plant Superintendent shall be responsible for assuring that personnel performing special processes are qualified and are employing qualified procedures. Procedures shall also be established for recording evidence of acceptable accomplishments of special processes using qualified procedures, equipment, and personnel. 6.

Plant and other responsible KG&E organization procedures shall also be established, as appropriate, to prescribe measures for the preparation, review, and approval of procedures for the control of special processes. Plant procedures shall address nondestructive examination (NDE) personnel, special process procedures, and inspection personnel qualification requirements. Procedures detailing special processes prepared by KG&E engineering organizations shall receive an independent review to assure that quality requirements and acceptance criteria have been incorporated and recorded.

## 17.2.12 CONTROL OF MEASURING AND TEST EQUIPMENT

### 17.2.12.1 Scope

The calibration and control program established at the WCGS shall assure that tools, gauges, and instruments maintain their required accuracy. The Plant Superintendent shall be responsible for assuring the program's establishment and implementation. Test instrumentation shall be utilized by various organizations as required to perform tests or other special operations. Each organization shall be responsible for assuring that the measuring and test equipment (M&TE) it employs has been properly calibrated. Outside organizations and other KG&E organizations employing M&TE in quality activities at the WCGS shall be required to implement a calibration and control program consistent with the requirements described herein.

### 17.2.12.2 Procedural Control

M&TE utilized in activities related to the operation of the WCGS shall be controlled in accordance with written procedures or instructions. The procedures for the calibration and control of M&TE shall address identification of the item to be calibrated and test equipment, calibration techniques including acceptance tolerances, calibration frequencies, maintenance control, storage requirements and any special instructions. The equipment subject to these controls shall include measuring instruments, test instruments, tools, gauges, reference standards, transfer standards, and nondestructive test equipment employed in measuring, inspecting, and monitoring safety-related structures, systems, and components. Permanently installed process instrumentation is not included in this listing.

Inspection, test, maintenance, repair, and other procedures shall include provisions to assure that M&TE employed in activities affecting quality are of the proper range, type, and accuracy to verify conformance to requirements and test parameters.

### 17.2.12.3 Program Requirements

The calibration and control program shall provide for:

1. The assignment of specific calibration intervals for M&TE and calibration procedures which specify calibration methods and instrument accuracy requirements. Interval selection shall be a function of the equipment type, inherent stability and reliability, intended use, required accuracy, and other conditions which may affect calibration. Records shall be

maintained to permit a determination of calibration intervals. M&TE requiring periodic calibration will have a calibration label to indicate the due date of the next calibration. This label will be attached to the instrument, or to its case where this is not practical. A special calibration shall be performed when the accuracy of any M&TE is suspect. 6.

2. The unique identification of M&TE.

3. The traceability to calibration test data.

4. The traceability of reference standards to nationally recognized standards and the periodic revalidation of reference standards.

5. The maintenance of records which indicate the status of each item of M&TE, maintenance history, calibration results, anomalies, and most recent and next scheduled calibration dates. A recall system shall be established to assure that equipment which is outside its calibration interval is not used.

6. The maintenance and control of M&TE not in use.

7. Provisions to control purchase requirements and acceptance tests for M&TE sent out for calibration and for new or replacement M&TE, including the requirements for accuracy, stability, and repeatability.

8. The calibration of M&TE should be against a working standard having an accuracy of at least four times the specified tolerance of the M&TE. When this is not practical, standards shall have an accuracy which assures that the equipment being calibrated will be within its required tolerance. Management review and approval of calibration procedures provides authorization where any specific calibration ratio cannot be met or where calibrating standards do not have greater accuracy than the M&TE being calibrated.

The controls stated above are also generally applicable to permanently installed process instrumentation. The most significant differences in the QA controls for the two different categories of instruments are: 6.

1. All M&TE used for acceptance measurements or calibration of safety-related plant instrumentation must be controlled under this section. Only safety-related permanently installed process instrumentation must be so controlled.

2. Separate administrative procedures are used for M&TE and permanently installed process instrumentation.

3. Calibration and replacement of M&TE is documented on calibration laboratory records. Repair, maintenance, and replacement of permanently installed safety-related process instrumentation is controlled by a "Work Request" procedure including calibration.

4. M&TE where practical should be calibrated against standards four times as accurate as the M&TE being calibrated. Permanently installed safety-related process instruments are calibrated against M&TE which are at least as accurate as the accuracy required of the process instrumentation being calibrated in accordance with written and approved procedures. 6.

5. M&TE is tagged or labeled to show the due date for next calibration. Permanently installed safety-related instruments are uniquely identified and records are maintained which indicate calibration dates and the due dates for the next inspection/calibration.

17.2.12.4 Calibration Controls

Calibration shall be performed against certified equipment or reference or working standards having known relationships to nationally recognized standards. Where no national standard exists, provisions shall be established to document the basis for calibration. Special calibration and control measures shall not apply to rulers, tape measures, levels, and other devices if normal commercial practice affords adequate accuracy.

17.2.12.5 Nonconformance Controls

M&TE found to be out of calibration shall require an investigation to evaluate the validity of previous measuring, test, inspection, and calibration results and the acceptability of impacted items. Investigations shall be documented and shall evaluate the necessity of repeating original measurements, inspections, tests, or calibrations to establish the acceptability of such items. When the calibration history of an item shows it to be consistently out of calibration, the item shall be repaired, replaced, or the calibration interval modified.

17.2.12.6 Records

Records of KG&E plant calibration activities shall be maintained by the plant staff.

7. Identification of Change

Page 17.2-53

Reason for Change

This updated page clarifies the fact that a Corrective Action Report is not required for conditions identified that are reportable to the NRC under the rules of 10CFR50.55(e), 10CFR21, or other regulations.

Basis for Concluding that the Revised Program Satisfies 10CFR50 Appendix B

Several mechanisms are available for meeting the requirements of Criteria XVI, "Corrective Action," of Appendix B. These include the KG&E Corrective Action Report system as well as NRC reportability regulations such as 10CFR50.55(e) and 10CFR21.

## 17.2.16 CORRECTIVE ACTION

### 17.2.16.1 Scope

Corrective action control measures shall be established to assure that conditions adverse to quality are promptly identified, reported, and corrected to preclude recurrence. Corrective action is necessary to correct omissions and problems in the OQAP. Corrective actions associated with the resolution of NCRs, audit, and surveillance findings are processed in accordance with Sections 17.2.15 and 17.2.18, respectively.

Significant conditions adverse to quality which impede the implementation or reduce the effectiveness of the program shall be controlled by the measures described herein. These conditions shall be reported to appropriate management, evaluated, and corrected. Significant adverse conditions may include an isolated gross noncompliance with procedural requirements, a recurring condition for which past corrective action has been ineffective, significant adverse nonconformance trends, or significant OQAP deficiencies.

### 17.2.16.2 Corrective Action Report (CAR)

Procedures shall provide instructions for identifying, reporting, and initiating corrective action to preclude recurrence of significant adverse conditions. A Corrective Action Report (CAR) shall be employed to document significant adverse conditions and to initiate the corrective actions for these conditions except in those instances when 10CFR21 reports, 10CFR-50.55(e) reports or similar regulation required reports are prepared. 7. 7.

CARs shall be initiated by the Quality Assurance Division. CARs are transmitted to the responsible KG&E manager. The manager shall identify the cause(s) of the deficiency, specify the action(s) necessary to correct the condition(s) and prevent recurrence, and provide or initiate the corrective action.

Nuclear Plant Engineering, Nuclear Services or the WCGS staff, as appropriate, shall review all significant conditions adverse to quality which involve design deficiencies or recommended corrective actions which require design change. In such cases the appropriate engineering organization shall be responsible for cause identification and recommending corrective action.

8. Identification of Change

Table 17.2-1

Reason for Change

The table was revised to provide a better definition of the review and approval cycle for the various types of procedures contained in the Wolf Creek Generating Station Procedure Manuals.

Basis for Concluding that the Revised Program Satisfies 10CFR50 Appendix B

Appendix B requirements for establishing and executing a review/authorization cycle for procedures have not been changed. This cycle varies depending on the type of procedure.

TABLE 17.2-1

CONTROLLED PROCEDURE MANUALS

| Identification | Description | Approval |
|---|---|---|
| Wolf Creek Project Policy Manual | A manual consisting of policies and general procedures which have applicability to all project personnel. These documents establish specific responsibilities and authority of the individuals and organizations involved with the project, and establish common methods for activities performed by the nuclear divisions which must be uniform. | All sections of this manual will be reviewed and commented upon by the Division Heads.<br><br>Approval and issuance of this manual and changes thereto will be by the Vice President-Nuclear. |
| Wolf Creek Generating Station Procedure Manuals | A multi-volume set of procedures prepared by the plant staff with the aid of the other SNUPPS utility, the Lead A/E, and the NSSS supplier. These procedures are divided into two areas, Operations and Startup. The Operations section of the Station Manual are controlled, issued and approved in accordance with the applicable procedural controls under the direction of the Plant Superintendent. The Startup section of the Station Manual is controlled, issued and approved in accordance with the applicable procedural controls under the direction of the Startup Manager. These procedures implement the requirement specified in the QAM, where required, regarding WCGS internal and external interfacing of operating quality activities. These manuals include administrative controls for the conduct of an | For the Operations Organization, all safety-related procedures and all revisions thereto shall be reviewed by the WCGS Plant Safety Review Committee (PSRC) or a subcommittee thereof. Final approval of all procedures and revisions to the Operating Organization procedures are made at the appropriate management level as outlined in the administrative procedures. For the Startup Organization, all procedures and changes thereto are approved by the Joint Test Group (JTG) and the appropriate management level in accordance with the applicable administrative procedures.<br><br>QA personnel will review the administrative and inspection procedures contained in this manual and any revisions or changes thereto. |

TABLE 17.2-1

CONTROLLED PROCEDURE MANUALS

| Identification | Description | Approval |
|---|---|---|
| Wolf Creek Project Policy Manual | A manual consisting of policies and general procedures which have applicability to all project personnel. These documents establish specific responsibilities and authority of the individuals and organizations involved with the project, and establish common methods for activities performed by the nuclear divisions which must be uniform. | All sections of this manual will be reviewed and commented upon by the Division Heads.<br><br>Approval and issuance of this manual and changes thereto will be by the Vice President-Nuclear. |
| Wolf Creek Generating Station Procedure Manuals | A multi-volume set of procedures prepared by the plant staff with the aid of the other SNUPPS utility, the Lead A/E, and the NSSS supplier. These procedures are divided into two areas, Operations and Startup. The Operations section of the Station Manual are controlled, issued and approved in accordance with the applicable procedural controls under the direction of the Plant Superintendent. The Startup section of the Station Manual is controlled, issued and approved in accordance with the applicable procedural controls under the direction of the Startup Manager. These procedures implement the requirement specified in the QQAM, where required, regarding WCGS internal and external interfacing of operating quality activities. These manuals include administrative controls for the conduct of an | For the Operations Organization, all safety-related procedures and all revisions thereto shall be reviewed by the WCGS Plant Safety Review Committee (PSRC) or a subcommittee thereof. Final approval of all procedures and revisions to the Operating Organization procedures are made at the appropriate management level as outlined in the administrative procedures. For the Startup Organization, all preoperational test procedures, administrative procedures, and changes thereto are approved by the Joint Test Group (JTG) and the appropriate management level in accordance with the applicable administrative procedures.<br><br>QA personnel will review the administrative and inspection procedures contained in this manual and any revisions or changes thereto. |

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