WOLF CREEK
NUCLEAR OPERATING CORPORATION

Forrest T. Rhodes
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ET 92-0013

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

Subject: Docket No. 50-482: Operational Quality Assurance Program Changes Pursuant to 10 CFR 50.54(a)(3)

Gentlemen:

The purpose of this letter is to provide, for review and approval, a change to the Wolf Creek Nuclear Operating Corporation's (WCNOC) Operational Quality Assurance Program. The proposed change provides for the development of Configuration Change Packages (CCP). CCPs will be used to control and simplify a portion of the drawing change process. Pursuant to 10 CFR 50.54(a)(3), this change has been evaluated by WCNOC and determined to reduce commitments made in the approved Quality Assurance Program. However, the evaluation also determined the change does not reduce the Quality Assurance Program and the Quality Assurance Program continues to satisfy the criteria of Appendix B of 10 CFR Part 50.

Pursuant to 10 CFR 50.54(a)(3), a copy of the proposed change to Chapter 17 of the Updated Safety Analysis Report is attached for review (Attachment 1). Attachment 2 is an explanation and justification for the proposed change. If you have any questions concerning this matter, please contact me or Mr. S. G. Wideman of my staff.

Very truly yours,

Forrest T. Rhodes
Vice President
Engineering & Technical Services

FTR/aem

cc: A. T. Howell (NRC), w/a
R. D. Martin (NRC), w/a
G. A. Pick (NRC), w/a
W. D. Reckley (NRC), w/a

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Procedures identify the responsibilities of the verifier, the features to be verified the pertinent considerations to be verified, and the documentation required.

Special reviews are performed when uniqueness or special design considerations warrant.

Design analyses are sufficiently detailed as to purpose, method, assumptions, design requirements, references and units to permit an independent review by a technically qualified person. Computer codes are verified to be certified for use, and it is verified that their intended purpose is specified.

Additionally, the Operating Agent performs reviews of selected design documents for sub-contracted design to become familiar with design features.

Actions are initiated to resolve errors found in the design process and to assure that changes are controlled. Such actions are documented.

17.2.3.7 Design/Configuration Changes

Changes to plant design may be necessary to correct operational deficiencies, incorporate improvements, or to comply with new regulatory requirements. [~~Design changes are defined to mean 1) planned changes in the basic plant design which modify the plant response, general design criteria, and specification requirements; 2) the substitution of equivalent hardware or the substitution of nonsafety-related parts or components into safety-related components or systems; and 3) any noneditorial change to a design document. Changes in the WCGS basic design are aimed at improving safety, performance, maintainability, reliability, or inspectability. An engineering evaluation assures that these changes are consistent with the performance requirements specified in existing design documents. Design changes are reviewed by cognizant organizations through the Plant Modification Request process.~~]

Design changes are defined as changes to the design bases or the design function of a component or system. (Example: 1. Planned changes in the basic plant design which modify the plant response and general design criteria. 2. The substitution of non-safety related parts or components into safety related components or systems except those parts or components that have been downgraded by parts classification program.) Design changes are reviewed by cognizant organizations through the Plant Modification Request process. Configuration changes are defined as changes to design documentation that do not affect the design bases nor the design function of a component or system. (Examples: 1. The substitution of equivalent hardware into safety related components or systems; 2. Any change to design documentation [editorial or non-editorial] or hardware that does not modify plant response, general design criteria nor specification requirements.) Configuration changes are reviewed by cognizant organizations through the Configuration Change Package process. An engineering evaluation assures that these changes are consistent with the performance requirements specified in existing design documents.

Procedures specify requirements for the review and approval of design/**configuration** changes by the organizations that performed the original design, if appropriate. Design activities may be delegated to others provided they have access to background and technical information. Design/**configuration** changes are communicated to appropriate plant personnel when such changes may affect the performance of their duties.

Temporary Modifications, interim and short-term changes to the approved station design, are controlled in accordance with approved procedures.

17.2.3.8 Design Review Committees

Independent of the responsibilities of the design organization, the requirements of the Plant Safety Review Committee (PSRC) and the Nuclear Safety Review Committee (NSRC) are satisfied. [~~Design changes which involve a modification or a creation of basic design criteria require a safety evaluation and review, and concurrence by the PSRC. Design changes which involve the substitution of hardware require a safety evaluation by the PSRC and approval by the Plant Manager; however, those changes which involve an unreviewed safety question or change in Technical Specifications also require a review and concurrence by the NSRC.~~]**Proposed design/configuration changes are screened to determine if safety evauations are required. Design/configuration changes which could involve an unreviewed safety question require a safety evaluation, and review and concurrence by the PSRC. Those changes which involve an unreviewed safety question or change in Technical Specifications also require a review and concurrence by the NSRC.** When design is performed by an outside organization, Engineering and Technical Services performs or coordinates a review for operability, maintainability, inspectability, SAR commitment compatability, and design requirements imposed by plant equipment. In addition, Engineering and Technical Services identifies and controls design interfaces and coordinates the design process between internal divisions and the outside organization(s).

When required, safety analyses which consider the effect of the design as described in the design documents may be performed by the Operating Agent. These analyses provide the basis for the PSRC safety evaluations which are performed to determine that design changes do not involve an unreviewed safety question. Approved safety analyses or names of outside organizations performing the analyses are submitted to the PSRC. The safety analyses for design changes involving the substitution of hardware assure that the changes are consistent with and do not alter the performance requirements specified in existing design documents. The engineering approval of design documents and safety analyses prepared by outside organizations is by the outside organization unless otherwise specified.

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The PSRC performs safety evaluations and reviews design changes to determine whether or not they involve a change in Technical Specifications. The PSRC reviews design documents as necessary to recommend final approval of design criteria, identify unreviewed safety questions, or identify needed changes to Technical Specifications. Proposed changes to Technical Specifications are forwarded to the NSRC for review and approval **prior to submittal to the NRC** pursuant to 10 CFR 50. The NSRC reviews appropriate material to verify that proposed modifications do not in fact involve an unreviewed safety question.

Design changes and test procedures are reviewed by the PSRC prior to implementation. Records are maintained which reflect current design, including safety analyses, safety evaluations, design change installation procedures, material identification documents, procurement documents, special process documents, equipment and installation specifications, and as-built drawings.

procedural requirements which impact the quality of an item. Nonconforming activities which have not resulted in hardware nonconformances (i.e., programatic or procedural deficiencies which do not impact the quality of an item), are corrected in accordance with Chapter 17.2.16, Corrective Action.

17.2.15.2 Nonconformance Controls

Nonconformances identified under the Operating Agent's Operating Quality Program are identified, documented, controlled, dispositioned and corrected in accordance with approved procedures. These measures provide for the notification of affected parties and controls to prevent the inadvertent use of nonconforming items.

Nonconformances are controlled by report documentation, tagging, marking, logging, or physical segregation. Nonconformances are documented on records which identify the nonconforming condition, record the disposition, and register the signature of an appropriate approval authority. Nonconformances are reworked, rejected, repaired, or accepted. Repaired and reworked items are reinspected/tested in accordance with applicable procedures to ensure that critical attributes possibly affected by the nonconforming condition remain acceptable. These procedures are based on original inspection and test requirements or approved alternatives. Reinspection results and operational data, gathered subsequent to repair or rework, are documented or referenced on nonconformance, test or inspection documentation.

Configuration Change Packages (CCPs) and Plant Modification Requests (PMRs) are used in the Nonconformance Program to carry out dispositions of "use-as-is" or "repair." **[~~The PMR process~~]These two processes** ensures that all aspects of plant operation are considered in light of the fact that the dispositioned item is now not exactly per original design. These considerations include revision of applicable drawings, possible revisions to operation, test, maintenance and inspection procedures; training of affected personnel, changes to spare parts inventory; unreviewed safety questions; and review of licensing documents.

Measures have been established to control the conditional release of nonconformances for which correction is pending and a technical evaluation indicates that installation and/or testing will not adversely affect nor preclude identification and correction of the nonconformance. A conditional release to proceed installation and/or with testing of a system or subsystem with outstanding nonconformances considers the nature of the nonconformance, its effect on installation and/or testing and the need for supplemental tests or inspections after correction of the nonconformance. Conditional release evaluations are documented. Safety-related and special scope conditional releases are

reviewed and approved by the Operating Agent's Quality Department prior to implementation.

Nonconforming items required for Technical Specification Operability are only released for use through the completion of a **Configuration Change Package (CCP) or** a Plant Modification Request (PMR) and, thus, cannot be conditionally released for operations.

17.2.15.3 Reporting Methods

Nonconformance Reports, Work Requests, and Deficient Document Notices are employed to document nonconformances.

Nonconformance Reports are used to document nonconforming materials, parts, or components under warehouse control.

Work Requests may be used to document nonconforming conditions identified after issue from the warehouse.

Nonconformance Reports and Work Requests requiring "Use-As-Is" or "Repair" dispositions are reviewed and dispositioned by the responsible design authority.

Deficient Document Notices are used to document minor documentation-related nonconformances which are identified at time of receipt inspection.

Documentation discrepancies identified after receipt inspection that render the quality of hardware indeterminate are documented using an NCR.

17.2.15.4 Disposition

Procedures prescribe the individuals or groups assigned the responsibility and authority to approve the disposition of nonconformances. Nonconformance disposition categories are:

1. "Reject" - the process by which a nonconforming item is rejected for use and either scrapped, returned to vendor, or downgraded to allow for use in a Non-Q System.

2. "Rework" - the process by which a nonconforming item is made to conform to a prior specified requirement by completion, remachining, reassembling or other corrective means.

Justification For Proposed Change

The change involves the development of Configuration Change Packages (CCP) and their inclusion into the design change process. This program change will be implemented to make the drawing change process more efficient by simplifying the review process. CCPs will be a form of design change. They will not be used to change design basis or design functions. They will however, be used to change design information such as equivalent hardware substitution or editorial and non-editorial changes that do not modify plant response, general design criteria or specification requirements. Configuration changes will be reviewed by cognizant organizations. They will not receive the same level of review as design changes. This modification of review responsibilities has been determined to be a decrease in commitments made to WCNOC's approved Quality Program.

This program change continues to meet the criteria of 10 CFR 50 Appendix B, III, "Design Control", because the cognizant organization will review the change prior to issuance to ensure the design bases/function of the system or component is maintained. If this review determines that the design/function has been affected, the change will be processed as a Plant Modification Request, revised so as not to affect the design/function, or cancelled. The Plant Modification Request Program is part of the approved Quality Assurance Program.