Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

June 28, 1984

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301
SUBMITTAL OF QUALITY ASSURANCE PROGRAM DESCRIPTION
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10CFR50.54(a)(2), we are submitting the latest revision of Section 1.8 of our Final Safety Analysis Report which describes the Quality Assurance Program being implemented at Point Beach Nuclear Plant.

The QA Program description was last submitted to you on June 10, 1983. Subsequent to that submittal a request for additional information was made in a letter to Mr. S. Burstein from Mr. C. E. Norelius dated April 27, 1984 and the specific items of concern were discussed with your staff on June 7, 1984. The purpose of this letter is to respond to those items as discussed in the June 7, 1984 meeting and to also discuss changes in the QA Program that have occurred since the June 10, 1983 submittal. We continue to believe that none of the changes discussed below reflect a reduction in our QA Program commitments as previously approved by the NRC.

I. Changes of June 1983

The following provides a response and/or basis for the questioned changes as submitted on June 10, 1983:

1. Page 1.8-4, paragraph 3 (Revision 1 of June 1983)

On April 1, 1979, the Nuclear Power Department (NPD) was established. The Director of Quality Assurance and Technical Services was named as the Director of the NPD responsible for nuclear activities within the Company including quality assurance. On 1/1/82 the Director-NPD was made an Assistant-Vice President and subsequently on 1/1/83 became Vice President-NPD. During this period the Executive Vice President retained ultimate responsibility for the QA Program at PBNP although authority for day-to-day establishment of quality assurance policies, goals and objectives was delegated to the Vice President-NPD. The Vice

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President - NPD and the General Superintendent of QA (formerly the Superintendent of QA) have always had direct access to the Executive Vice President in matters related to quality through periodic, scheduled formal briefings or informally as the need arose. While the organization was changing there was essentially no change in the importance placed on QA matters, the independence and authority of the QA organization, or in regard to the QA organization's access to top management.

2. Page 1.8-5, Paragraph 2 (Revision 1 of June 1983)

As stated in Item I.1 above, the Director of Quality Assurance and Technical Services (QATS) has become the Vice President-NPD and, also, due to the recent reorganization, the QA Committee is now responsible to the President. The concept of rotating the chairmanship from member to member was established to allow flexibility in administration of the QA Committee and to relieve some of the burden from the then, Director of QATS. The Chairman was selected by the Executive Vice President and was afforded direct access to the Executive Vice President in matters relating to the QA Committee. (Effective May 9, 1984, the chairman is selected by, and reports to, the President.) In this respect, changing the chairperson has no affect on the authority, responsibility or visibility of the QA Committee. It is also our intent that the QA Committee meet on a quarterly basis. We do not consider that this commitment has been changed, although we have attempted to incorporate provisions for those few instances where a meeting cannot be held in a specific calendar quarter due to member unavailability or other uncontrollable circumstances.

As indicated in the above paragraph another recent change has occurred regarding the QA Committee. In addition to the committee reporting to the President, the committee structure has also been changed. The committee membership is now composed of company officers and with this change we believe will go increased upper management involvement and high level assessment of the QA Program. These changes are reflected as part of revision 2 (Page 1.8-5, Paragraph 2).

3 Page 1.8-6, Paragraph 1, Item 3 (Revision 1 of June 1983)

This change reflects a significant increase in the scope of onsite auditing activity under the cognizance of the QA Coordinator. Previously the QA Coordinator performed a generic monthly audit which was limited in scope and depth. The present audit program conducted by the QA Coordinator is more detailed and comprehensive and has resulted in a major increase in scope of coverage. Audits conducted under the congnizance of the QA Coordinator are generally technical in nature and are performed by personnel having requisite technical competence. Qualification of personnel performing technical audits is addressed in our response to Generic Letter 81-01.

This item is an example of improvements which are being made in our QA Program to enhance its overall effectiveness.

4. Page 1.8-7, Paragraph 2, Item 1 (Revision 1 of June 1983)

The method of distribution and maintenance of the Administrative Control, Policies and Procedures Manual (QA Volume I), and revisions thereto, is described in lower tier procedures. The wording in Section 1.8 was revised to remove some of the detail which is contained in these lower tier documents.

Positive controls continue to be implemented to assure current revisions are distributed and used. Various methods of control such as return-receipt documents may be implemented. However we presently perform selected surveillance of controlled manuals to verify their currency. Based on our experience at Point Beach we believe this method is more effective than using return-receipt documents.

5. Page 1.8-7, Paragraph 2, Item 2 (Revision 1 of June 1983)

The method of distribution and maintenance of the Quality Assurance and Reliability Manual for Materials, Repairs and Modifications (QA Volume II), and revisions thereto, has not changed. Wording was revised in Section 1.8 to remove some of the details which are contained in other lower tier procedures or instructions.

Also as stated in Item I.1 above, authority for establishment of quality assurance policies, goals and objectives has been delegated to the Vice President-NPD although the President retains ultimate responsibility for the program.

6. Page 1.8-8, Paragraphs 1&2 (Revision 1 of June 1983)

Table H.2-2 which was previously included in Appendix H to the PBNP FFDSAR was deleted from Section 1.8 since it was detail which is contained in implementing documents. (In this case, QA Volume II.) The control of the list has not changed and reference to the controlling document is made in Section 1.8. Changes to the list are controlled and the content of the list reflects increases in quality assurance scope systems and equipment. Revision 2 of Section 1.8 clearly establishes the scope and basis for the referenced list.

7. Page 1.8-9, Paragraph 5 (Revision 1 of June 1983)

This revision to Section 1.8 was made to more clearly describe the housekeeping controls at Point Beach and reflect the actual intent of our commitments (additional clarification has also been made in revision 2). In a literal sense the commitment to "daily" housekeeping inspections by the plant manager was not possible. He continues to give personal attention to housekeeping as well as receiving considerable assistance from on-site and off-site management personnel. In addition to routine inspections such as those for fire protection or radioactive contamination, management provides almost continuous attention and inspections of housekeeping. We believe the present format exceeds the intent of our original commitments to housekeeping.

8. Page 1.8-13, Paragraph 2 (Revision 1 of June 1983)

The provisions of paragraph 6.2.2 and 6.3 of Appendix H were inadvertently omitted when revision 0 of Section 1.8 was established in July, 1982. This omission in Revision 1 was a carry-over from revision 0 and has been reincorporated as part of revision 2 (Page 1.8-13, Paragraph 2).

9. Page 1.8-14, Paragraph 2 (Revision 1 of June 1983)

The controlling mechanism for incoming quality assurance materials and equipment continues to be the Quality Assurance Release (QAR) system. Typically all requirements of the purchase order, including documentary evidence, are satisfied and a QAR number is assigned prior to the items release from the storeroom. Occasionally, however, due to unique or exceptional circumstances it is necessary to install, or even place into service, an item prior to completion of all the purchase order requirements. While these occurrences are quite rare we have had occasion to do so. Positive control of these items is accomplished procedurally to provide justification for their use and to assure their identification (conditional release). These controls also assure subsequent fulfillment of purchase order requirements and issuance of the QAR number. These program changes have been more clearly addressed as part of revision 2 (page 1.8-14, paragraph 3).

10. Page 1.8-16, Paragraph 4 (Revision 1 of June 1983)

The words in this paragraph, which address qualification of inspection and test personnel working for contractors, were revised as part of revision 0 in July 1982. There was no intent at that time to change our commitment although we acknowledge that the words in Section 1.8, revision 1, convey a different perspective than those which were originally contained in Appendix H. Accordingly, the wording has been changed as part of revision 2 to more accurately reflect the previous commitments.

11. Page 1.8-17, Paragraph 1 (Revision 1 of June 1983)

As discussed in item I.7 above, due to constraints in the Manager - PBNP's availability, it is not possible for him to personally interview all plant personnel prior to employment, although whenever possible this is done. When conflicts occur plant policy is to require interviews with other senior onsite managers. In any case, the final determination of acceptability is based on the judgement of the Manager - PBNP whether through his personal interview or those of other senior managers. In addition to this employment process, the Manager - PBNP reviews individual experience and qualifications prior to that individual assuming a position of authority under the WE QA program. Clarification has been provided in revision 2 (Page 1.8-17, Paragraph 2).

12. Page 1.8-18, Paragraph 2 (Revision 1 of June 1983)

The change in this section was the deletion of a reference to call-up cards as a method to control Measuring and Test Equipment (M&TE). As in previous responses, this was done to delete some of

the detail which is contained in lower tier documents. At present, we continue the call-up card process, however, this method of control may be changed at a later date if a better method becomes available (such as a computer-based system). We have made a change, as part of revision 2 (Page 1.8-18, Paragraph 3), to explicitly refer to "positive" control of M&TE.

13. Page 1.8-19, Paragraph 3 (Revision 1 of June 1983)

In this paragraph the word immediate was removed in favor of timely to better describe our practice. A literal reading of immediate return could require the return of nonconforming material as soon as it is delivered. In fact, the process of receipt and verification of the QA documentation requires some verification period. This verification is accomplished on an expeditious basis and nonconforming materials are returned when necessary. Our commitment to return nonconforming materials has not changed.

We have also made changes to this paragraph (and paragraph 4), as part of revision 2, to reflect the evolution of the QA Program, and specifically, our implementation of formal provisions to control the identification and disposition of non-conforming or discrepant items.

14. Page 1.8-21, Paragraph 5 (Revision 1 of June 1983)

The remote fire alarm for the records storage facility is audible and visible from a continuously manned guard station. Since this is the case we consider the alarm to be continuously monitored. A change has been made to this paragraph, as part of revision 2, to explicitly describe this monitoring action.

15. Page 1.8-22, Paragraph 3 (Revision 1 of June 1983)

The periodicity of audits conducted by the QA Coordinator or his designee was changed from monthly to quarterly to provide greater flexibility and quality in the audit process. When audits were conducted monthly, they were not as broad in scope as are the audits conducted currently. Every attempt is made to perform audits on a monthly schedule; however, flexibility must be maintained to allow for schedular difficulties. Our commitment to QA audits has not been reduced, and in fact, as stated in item I.3 above, we believe a significant improvement in our on-site audit program has been made.

The performance of Technical Specification audits under the cognizance of the Off-Site Review Committee has also been addressed as part of revision 2 (Page 1.8-22, Paragraph 3).

II. Changes of June 1984

The following provides an explanation and/or basis for changes made as revision 2 of June 1984:

1. General - On two occasions since our last submittal, changes have been made in the Company and Nuclear Power Department organizations as depicted in Figures 1.8-1 through 1.8-4:

   a. On January 1, 1984 the Nuclear Engineering Section was split into two sections: Nuclear Systems Engineering and Analysis Section and Nuclear Plant Engineering & Regulation Section. Each section is headed by a General Superintendent. Also at this time the Superintendent of QA became the General Superintendent of the QA Section (Figures 1.8-2 and 1.8-4).

   b. Effective May 9, 1984, the Vice President - Nuclear Power Department now reports to the President (Figure 1.8-1).

   The organizational and title changes are reflected throughout Section 1.8 as part of this revision. None of these changes effect our quality assurance commitments since the authority and independence of the Vice President-NPD and the Quality Assurance organization is not reduced.

2. Page 1.8-1, Paragraph 1 - 10CFR71, Appendix E, was changed to 10CFR71, Subpart H, reflecting recent changes in regulation nomenclature.

3. Page 1.8-1, Paragraph 1 - "Appendix B" was added for clarity.

4. Page 1.8-4, Paragraph 2 - The second sentence in this paragraph was relocated from page 1.8-5, Paragraph 4. Also slight wording changes were made to clarify the commitment.

5. Page 1.8-4, Paragraph 3 - See items I.1 and II.1 above for explanation of description changes.

6. Page 1.8-5, Paragraph 1 - Reflects changes in position title.

7. Page 1.8-5, Paragraph 2 - See item I.2 above for explanation of changes in the Quality Assurance Committee.

8. Page 1.8-6, Paragraph 3 - Reflects changes in organizational title. Also words were added to relate the verification of received items to purchase document requirements.

9. Page 1.8-7, Paragraph 1 - Scope of this paragraph was expanded to reflect other Quality Assurance Section responsibilities, namely, auditing of off-site vendors and contractors.

10. Page 1.8-7, Paragraph 2 - Same explanation as item II.2 above.

11. Page 1.8-7, Paragraph 2, Items 1&2 - See items I.4 and I.5 above for the explanation of description changes. Also reflects position title changes.

12. Page 1.8-7, Paragraph 3 - Reflects changes in organization as discussed in Item II.1 above. (i.e. The President is now ultimately responsible for the QA Program and he receives regular title.

briefings on quality assurance matters)

13. Page 1.8-8, Paragraph 1 - See item I.6 above for explanation of description changes.

14. Page 1.8-8, Paragraph 3, Item 3 - Words added to highlight the maintenance of training records.

15. Page 1.8-9, Paragraph 4 - Streamlined wording in first sentence by deleting extraneous words (i.e. deleted "more properly" preceding the word "controlled".)

16. Page 1.8-9, Paragraph 6 - See item I.7 above for explanation of description changes in regard to housekeeping.

17. Page 1.8-11, Paragraphs 2&3 - Reflects changes in organizational title.

18. Page 1.8-11, Paragraph 5 - Expanded scope of the second sentence to include "control" of procedures, instructions or drawings as well as their preparation and revision.

19. Page 1.8-13, Paragraph 2 - See item I.8 above for explanation of description changes regarding document control.

20. Page 1.8-13, Paragraph 4 - Reflects changes in organizational title.

21. Page 1.8-14, Paragraph 3 - See item I.9 above for explanation of description changes regarding control of purchased items.

22. Page 1.8-16, Paragraph 3 - Reflects changes in organizational title.

23. Page 1.8-17, Paragraph 1 - See item I.10 above for explanation of description changes regarding qualification of contractor inspection and test personnel.

24. Page 1.8-17, Paragraph 2 - Changes "jobs" to "positions" to be consistent with remainder of paragraph. Also see item I.11 above for explanation of description changes regarding employment of plant personnel.

25. Page 1.8-17, Paragraph 3 - Reflects changes in organizational title.

26. Page 1.8-18, Paragraph 1 - Added word "activity" for clarity.

27. Page 1.8-18, Paragraph 3 - Added words "positively controlled" for clarity. Also see item I.12 above for additional explanation.

28. Page 1.8-19, Paragraphs 3&4 - See item I.13 above for explanation of changes regarding nonconformance control.

29. Page 1.8-20, Paragraph 1 - Reflects changes in organizational

30. Page 1.8-21, Paragraph 5 - See item I.14 above for explanation of description changes.

31. Page 1.8-22, Paragraph 3 - See item I.15 above for explanation of changes. Also reflects changes in organizational title.

32. Page 1.8-22, Paragraph 4 - Changed word "data" to "results" for clarity.

33. Table 1.8-3 - Same explanation as item II.2 above.

If you have any questions in regard to the above discussion or the attached information, please let us know.

Very truly yours,

C. W. Fay

Vice President - Nuclear Power

Attachment

Copies to: NRC Resident Inspector
NRC Document Control Desk
Washington D.C. (original)

1.8 QUALITY ASSURANCE PROGRAM

In accordance with Paragraph 50.34 of 10 CFR 50 and 71.24 of 10 CFR 71, a Nuclear Quality Assurance Program Description is herein provided by Wisconsin Electric Power Company (WE). This Program is to assure that the required manpower, procedures, and management of Point Beach Nuclear Plant are directed toward satisfying the Company quality objectives of providing safe and reliable structures, systems, and components; and complying with the provisions of 10 CFR 50, Appendix B "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants"; 10 CFR 71, Subpart H "Quality Assurance Criteria for Shipping Packages for Radioactive Material"; and the applicable Sections of the ASME Boiler and Pressure Vessel Code. The program described is structured in accordance with the outline of the 18 Criteria of Appendix B.

The following describes the quality assurance program established and imposed by the Company for application to the functional aspects of structures, systems, and components, including the design, purchasing, construction, and fabrication, handling, storage, shipping, cleaning, installation, erection, inspection, testing, operation, maintaining, refueling, repair, and modification of equipment considered significant to safety by the Company. These structures, systems, and components may be classified as safety-related in that they prevent or mitigate the consequences of postulated accidents, or as in the case of radioactive material packaging and fire protection, they may contribute to causing undue risk to the health and safety of the public or loss of services should they fail or malfunction. Structures, systems, and components not classified as safety-related items are controlled in accordance with the quality programs and applicable codes which are necessary to provide assurance of quality commensurate with the importance of the overall function(s) to be performed.

The principal objectives of the quality assurance program and the key functions and elements which it contains are not expected to change. However, circumstances may make advisable changes in the organization or in the implementing detail necessary, and such changes will be made in accordance with established procedures. Changes in the quality assurance program description will also be submitted to the NRC as required by 10 CFR 50.54.

The Point Beach Nuclear Plant Quality Assurance Program commits to the guidance provided in ANSI N18.7-1976, except as hereinafter specifically noted. Where exceptions are noted in the text of this section, the PBNP alternative system is discussed. Commitment to ANS N18.7-1976 includes either complete or partial commitment to the following additional standards:

ANSI N18.1-1971	Selection and Training of Nuclear Power Plant Personnel
ANSI N18.17-1973	Industrial Security for Nuclear Power Plants
ANSI N45.2.1-1973	Cleaning of Fluid Systems and Associated Components for Nuclear Power Plants.
ANSI N45.2.2-1972	Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (During the Construction Phase)
ANSI N45.2.3-1973	Housekeeping During the Construction Phase of Nuclear Power Plants
ANSI N45.2.4-1972	Installation, Inspection, and Testing Requirements for Instrumentation and Electric Equipment During the Construction of Nuclear Power Generating Stations
ANSI N45.2.5-1974	Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants
ANSI N45.2.6-1973	Qualification of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants

ANSI N45.2.8-1975	Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants
ANSI N45.2.9-1974	Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants
ANSI N45.2.10-1973	Quality Assurance Terms and Definitions
ANSI N45.2.11-1974	Quality Assurance Requirements for the Design of Nuclear Power Plants
ANSI N45.2.12, Draft 4, Rev.2	Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants
ANSI N45.2.13-1976	Quality Assurance Requirements for Control of Procurement Items and Services for Nuclear Power Plants
ANSI N101.4-1972	Quality Assurance for Protective Coatings Applied to Nuclear Facilities

To the extent required by ANSI N18.7-1976 as hereinafter specifically noted, PBNP hereby commits to the above standards. Table 1.8-1 provides further information regarding commitments to regulatory guides and related standards.

1.8.1 ORGANIZATION

The authorities and responsibilities of persons and organizations performing quality related activites are established, assigned, and documented in a formal system. All quality assurance and quality control functions are performed by the Company QA organization (including both on-site and off-site personnel) except when the scope of specific projects indicate need to engage contractors to perform specific services.

Those persons and organizations assigned such functions are given appropriate and sufficient authority and organizational freedom to identify quality problems; verify implementation of the solutions; and prevent further processing, delivery, installation, or use of nonconforming items until proper dispositioning has occurred.

The organizational structure and functional responsibility assignments are such that: (1) attainment of quality objectives is accomplished by individuals assigned responsibility for specifying quality or performing work to specifications, (2) audits verifying conformance to established quality requirements are accomplished by those who do not have direct responsibility for performing the work being verified, and (3) personnel in key quality assurance functions have direct access to responsible management. The education and experience required of individuals assigned to QA positions is documented and approved by management.

The operating organization is reflected in Figure 15.6.2-2 of the Technical Specifications. The organization for quality assurance is reflected in Figures 1.8-1, 1.8-2, 1.8-3, and 1.8-4. The Vice President-Nuclear Power Department reports to the President. The Vice President-Nuclear Power Department has been delegated the authority to establish quality assurance policies, goals, and objectives as applicable to the Point Beach Nuclear Plant and the Nuclear Power Department. The President retains ultimate responsibility. The Vice President - Nuclear Power Department has direct access to the President in this regard.

Manager - Point Beach Nuclear Plant

The Manager-Point Beach Nuclear Plant is the senior company representative at the plant facility and, as such, is in direct day-to-day control of all normal plant administrative, technical operations and quality assurance. The Quality Assurance Coordinator reports to the Manager-Point Beach Nuclear Plant on quality-related matters. Quality Assurance Representatives report to the Quality Assurance Coordinator as members of the Quality, Standards & Records Organization as shown in Figure 1.8-3. The QA Coordinator and the QA Representatives (including participation on the Quality Standards, & Records Organization) are concurrent assignments.

General Superintendent of Quality Assurance

The General Superintendent of Qualtity Assurance reports to the Vice President-Nuclear Power Department. He is responsible for integrating the various quality assurance programs within the company including providing off-site quality assurance support for Point Beach.

Quality Assurance Committee

The Wisconsin Electric Quality Assurance Committee consists of Company officers and an outside consultant each designated by the President. The Quality Assurance committee assesses the adequacy and effectiveness of the Quality Assurance Program by reviewing quality assurance policies, procedures, and practices and through periodic initiation of audits. The Chairman of the Committee is appointed by the President. The Committee meets on a periodic basis, normally quarterly, but no less than three times per year to review the status of quality-related activites.

Off-Site Review Committee

The Off-site Review Committee (OSRC) is established in accordance with Technical Specifications, Section 15.6.5.3. The OSRC selectively reviews designated activities involving the operation of Point Beach Nuclear Plant including Technical Specification Compliance. Specific duties and responsibilities are described in the plant Technical Specifications, Section 15.6.5.3.

General Responsibilities

The responsibilities of individuals or groups performing QA functions are documented and approved by management. General responsibilities are as follows:

QA Coordinator

1. Assist plant groups on matters dealing with quality, codes and standards interpretation, interpretation and applica-

tion of the in-plant quality assurance manuals, regulatory record keeping and regulatory inspection activities.

2. Administer the quality assurance and control aspects of ordering, storing, use, and documenting of quality assurance spare parts and equipment in the plant.
3. Perform technical audits of plant groups with respect to the adequacy and implementation of quality assurance procedures and instructions and the adequacy of documentation (Section 1.8.18).

QA Representative

1. Report to the QA Coordinator observed documentation or physical infractions of quality assurance procedures and instructions or suspected violations of Technical Specification, State and Federal codes or standards, and commitments to Regulatory Guide positions.
2. Assist their respective group in conforming with the Operating Point Beach Nuclear Plant Administrative Control Policies & Procedures Manual.
3. Maintain and help coordinate the required storage of quality assurance records pertaining to their respective groups.

Quality Assurance Section

1. Review QA scope purchase documents to assure adequate quality requirements (Section 1.8.4) are established.
2. Verify conformance of received items to purchase document requirements through various activities including source verification, as appropriate, and review documentary evidence of quality for procured items prior to release of the items (Section 1.8.7).
3. Perform quality assurance evaluations of off-site vendors and contractors commensurate with the importance, complexity, and quantity of the product or services and assure vendor compliance with established requirements through audit and surveillance activities (Section 1.8.7).

4. Perform audits of the quality assurance program as implemented on-site by Plant personnel and contractors (Section 1.8.18). Also audit off-site company organizations performing quality-related activities for Point Beach.

1.8.2 QUALITY ASSURANCE PROGRAM

A quality assurance program is established and implemented in accordance with written policies, procedures, and instructions which comply with the requirements of 10 CFR 50 Appendix B and 10 CFR 71, Subpart H. The program is also applied to activities such as fire protection to a degree commensurate with Wisconsin Electric commitments. Specific QA Program applicability to fire protection and radioactive material packaging is addressed in Tables 1.8-2 and 1.8-3, respectively. The Point Beach Nuclear Plant Quality Assurance Program is set forth in the Administrative Control Policies and Procedures Manual (QA Volume I) and the Quality Assurance & Reliability Manual for Materials, Repairs and Modifications (QA Volume II). Control of the above manuals is as follows:

1. Distribution and maintenance of the Administrative Control Policies & Procedures Manual (QA Volume I) and revisions thereto is controlled by Point Beach Nuclear Plant. The manual is reviewed and approved on-site by the plant organization.

2. Distribution and maintenance of the Quality Assurance and Reliability Manual for Materials, Repairs and Modifications (QA Volume II) and revisions thereto is controlled by the General Superintendent of Quality Assurance. The Manual is reviewed and approved by the General Superintendent of Quality Assurance and the Vice President-Nuclear Power Department.

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

The quality assurance program applies to structures, systems and components (including expendable and consumable items which are used therein) which are considered important to safety from the standpoint of safety-related functions to be performed. The structures, systems and components considered important to safety are identified in the Quality Assurance & Reliability Manual for Materials, Repairs, and Modifications (QA Volume II). This list is consistant with requirements of the regulations as described in this FSAR, and also includes non safety-related systems and components requiring quality assurance coverage such as fire protection and radioactive material packaging. Positive controls are implemented to assure updating of the list as necessary.

The classification of a system or component as important to safety does not imply that the complete system, or all the components or component parts within that system, are important to safety. Those specific items within a system considered important to safety are also identified in QA Volume II.

The program provides for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained. The indoctrination and training program is structured to assure that:

1. Personnel performing quality activities are instructed as to the purpose, scope and implementation of the quality-related manuals, procedures and instructions; and it is emphasized that these are mandatory requirements which must be implemented and enforced.

2. Personnel performing quality-related activities are trained and qualified in the principles and techniques of the activity being performed.

3. Appropriate training procedures are established and that records of training are maintained.

Section 5.2.10 of ANSI N18.7-1976 states that the provisions of ANSI N45.2.3-1973 shall be applied to those activities which are comparable in nature and extent to related activities occurring during construction.

Point Beach Nuclear Plant practices good housekeeping and cleanliness involving activities performed by plant and contractor personnel to maintain the necessary standard of cleanliness.

Scheduled and documented daily-to-weekly surveys of potentially contaminated or radioactive areas are conducted by health physics personnel, followed by decontamination or radioactive cleanup as necessary, ensure cleanliness checks of even the least traveled areas. An additional program provides that Operations shifts are assigned specific plant areas to patrol and clean up as a housekeeping duty. Plant policy endorses and enforces the concept that each person is responsible for cleanliness and good housekeeping in their own immediate work area. Final inspections of work areas following completion of work, including final internal inspections of pressure vessels, tanks, etc., are routinely completed by supervisory personnel. Such inspections are formally documented only in special cases when considered necessary; these normally being final inspections by plant supervisory personnel following work by outside contractors.

Storage of items, combustible or otherwise, are controlled to defined quality assurance or fire protection requirements. Access to safety-related equipment or radiation controlled areas is more properly controlled by security regulations or defined health physics rules.

PBNP complies with OSHA regulations in the physical safety and environmental condition of work places.

Significant attention to housekeeping is provided by plant management including frequent housekeeping inspections of portions of the plant by the Manager-Point Beach Nuclear Plant. This constitutes a complete and in-depth inspection of essentially the total plant on a weekly basis.

1.8.3 DESIGN CONTROL

Procedures and practices are established and documented to assure that applicable regulatory requirements and design bases are correctly translated into design documents, such as specification and drawings, for work involving changes or additions to the original design of safety-related structures, systems, and components. These measures include provisions to assure that appropriate quality standards are specified and included in the design documents and that deviations from such standards are controlled. The measures also include provisions to control selection and review for the suitability of application of materials, parts, equipment, and processes that are essential to the safety-related function.

Procedures and practices are established and documented for the identification and control of design interfaces and for coordination among design organizations. These include procedures among participating design organizations for the review, approval, release, distribution, and revision of design documents. The design control measures provide for verifying or checking the adequacy of design by design reviews, by alternate or simplified calculational methods, or by suitable testing programs performed by individuals or groups other than the originator.

Where a test program is used to verify the adequacy of a specific design feature, provisions include suitable qualification testing of a prototype unit under the most adverse design conditions. Design control measures consider, as appropriate, reactor physics; stress, thermal, hydraulic, and accident analyses; compatibility of materials; accessibility for inservice inspection, maintenance and repair; and delineation of acceptance criteria for inspections and tests.

Further changes to designs are subjected to commensurate design control measures. When a contemplated change is considered by appropriate management to be of sufficient scope as to be beyond the expertise of in-house personnel, these changes are reviewed by the organization that performed the original design, or other design organizations determined to be equally qualified. Section 5.2.7.2 of ANSI N18.7-1976 requires that

design activities associated with modifications of safety-related structures, systems and components be performed in accordance with the provisions of ANSI N45.2.11-1974. Design activities associated with modifications are accomplished in accordance with the provisions of Section 8 of ANSI N45.2.11-1974.

1.8.4 PROCUREMENT DOCUMENT CONTROL

Procedures and practices are established and documented to provide assurance that applicable regulatory requirements, design bases, and other requirements which are necessary to assure adequate quality are included or referenced in the documents for procurement of materials, products, or services. These measures are applied to spare and replacement parts and equipment, new material, and equipment and contracting of services. Procedures require that procurement documents be prepared, reviewed, and approved in accordance with QA program requirements. The Quality Assurance Section reviews procurement documents to ensure the inclusion of adequate quality criteria. Records of the review are maintained to provide auditable documentation.

Procurement documents require suppliers, contractors, or subcontractors to implement quality assurance programs to the extent necessary. The programs are reviewed by the QA Section, qualified contractors, or industry organizations such as the Coordinating Agency for Supplier Evaluation (CASE). Concurrence with the adequacy of supplier programs is documented.

Further details of the system for control of procurement documents is contained in Section 1.8.7.

1.8.5 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Activities affecting quality are prescribed by documented instructions, procedures or drawings appropriate to the work at hand with the work accomplished in accordance with these documents. Measures have been established for the preparation, revision, and control of procedures, instructions, or drawings.

Instructions, procedures, and drawings are required to include appropriate quantitative or qualitative acceptance criteria to ensure work has been satisfactorily accomplished. Supervisors may direct that data be taken without the data taker being cognizant of the acceptance criteria when it is considered that forehand knowledge of the acceptance criteria may prejudice results. The Supervisor is then reponsible to verify conformance. To the extent applicable, as-built drawings and original equipment and system specifications establish acceptance criteria, subject to improvements based upon operational experience. When required, these instructions, procedures, and drawings provide methods for complying with appropriate regulations.

Section 5.2.2 of ANSI N18.7-1976 requires that temporary major procedure changes which do not change the intent of an approved procedure be approved by two members of the plant staff knowledgeable in the areas affected by the procedure. One of these individuals is to be the Duty-Shift Supervisor who holds a senior operators license. As described in Section 15.6 of the Technical Specifications, Point Beach follows the above guidance for operating procedures. For Maintenance, Instrumentation and Control, Reactor Engineering, and Chemistry and Health Physics procedures, approval is not required from the supervisor in charge of the shift for temporary changes. For a further description of the system for temporary changes, refer to Section 15.6.8 of the Technical Specifications.

Section 5.3.2 of ANSI N18.7-1976, which discusses the content of procedures, states in part, "...procedures shall include, as appropriate...(8) Acceptance Criteria." PBNP has determined through considerable experience that the incorporation of acceptance criteria is not always advantageous, as discussed herein.

1.8.6 DOCUMENT CONTROL

Procedures and practices are established and documented to control the issuance of documents; such as maintenance and modification procedures; design specifications; design, manufacturing, construction, and installation drawings; procurement documents; manufacturing, inspection, and

testing instructions; test and operating procedures; and QA manuals, safety analysis reports, and related design criteria documents; including all changes thereto. These include indentification of the group responsible for review, approval, and issuance of the documents. For quality related documents, the review includes the adequacy of incorporation of quality requirements.

The procedures provide assurance that documents, including changes, are reviewed for adequacy and approved for use by authorized personnel and are distributed to and used at the location where the prescribed activity is performed prior to commencement of the activity. These include prompt issuance of changes and control of the obsolete or superseded documents to prevent inadvertent use. Controls, such as maintenance and distribution of indices, are also implemented to identify the current revision of a document required to be used. These provisions are also used as a basis for auditing the document control system. Document control procedures include provisions for determining the appropriate group for reviewing changes to documents.

Documents classified as QA records are subjected to the additional requirements described in Section 1.8.17.

1.8.7 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

Procedures and practices are established and documented to assure that purchased material, equipment and services conform to the procurement documents. These measures include review of all plant initiated purchase requisitions by the QA Coordinator or his designee and subsequently, QA scope requisitions are reviewed by the QA Section to verify incorporation of appropriate quality requirements. Additionally, all requisitions initiated by Nuclear Engineering are reviewed by the QA Section.

The bases for selection of suppliers include previous experience, meeting the required qualifications of the contractor who erected the Plant on a "Turnkey" basis, or a pre-award evaluation of the proposed supplier's capabilities and qualifications. Industry programs, such as those applied by the American Society of Mechanical Engineers (ASME) and the Coordinating

Agency for Supplier Evaluation (CASE), are used as input or the basis for supplier qualification whenever appropriate.

Control of purchased items includes provisions, as appropriate, for source evaluation and selection, objective evidence of quality furnished by the contractor or subcontractor, inspection at the source, and examination of products at receipt. These controls also include provisions for monitoring contractors providing services through performance of audits and surveillances, as necessary, to verify conformance with procurement requirements. These are performed by appropriately trained personnel in accordance with written procedures and instructions.

Normal procedures require assignment of a Quality Assurance Release (QAR) identification number prior to placing purchased items into service. These procedures require that all documentory evidence required by the purchase order be available and satisfactory prior to issuance of the QAR. For those few exceptions where items are placed in service prior to issuance of the QAR number, procedural controls in the form of a "conditional release" system are in place to assure these items are appropriately controlled. Measures are provided for monitoring the effectiveness of contractor control of quality consistent with the importance, complexity, and quantity of the product or services.

The requirements of ANSI N45.2.13-1976 are met for the procurement of components within the scope of Section 5.2.13 of ANSI N18.7-1976.

1.8.8 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

Procedures and practices are established and documented requiring identification of materials, parts, and components, including partially fabricated assemblies, to prevent use of incorrect or defective items. Identification requirements are based on as-built drawings and specifications. Identification requirements for other than identical replacement items are determined during planning for the modification or addition. Identification methods and locations are selected so as not to affect the function or quality of the item.

These measures assure that identification is maintained by stock number, system identification, part number, or other appropriate means, either on the item or on records traceable to the item, as required during installation and use. These measures apply to plant personnel and on-site contractors.

Procurement documents invoke appropriate requirements for identification and control of material during manufacture, including provisions for in-process audits of the manufacturer's program which allow the licensee the option of auditing the vendor.

1.8.9 CONTROL OF SPECIAL PROCESSES

Procedures and practices are established and documented to assure that special processes, such as welding, heat treating, and nondestructive examinations are controlled and accomplished by qualified personnel using qualified procedures or process sheets in accordance with applicable codes and standards. Verification of conformance is documented. These measures require copies of qualifications to be on site during process performance whether by WE personnel or contractors. Procurement documents specify appropriate control requirements for processes performed off-site.

1.8.10 INSPECTION

Procedures and practices are established and documented providing for appropriate inspection of activities affecting quality and to verify conformance with the documented instructions, procedures, drawings, or specifications for accomplishing the activity. Inspection procedures, instructions, and checklists include the following, as applicable:

1. Identification of characteristics to be inspected.
2. Identification of the individuals or groups responsible for performing the inspection operation.
3. Acceptance and rejection criteria.
4. The method of the inspection.
5. Verification of completion and documentation of the inspection.

Maintenance, replacement, or rework items are inspected in accordance with original inspection requirements or improved requirements based on operating experience. Modified items are inspected by methods at least equivalent to the original inspection methods.

These measures provide for verification of conformance to be performed by appropriately qualified individuals other than those who performed the activity. Quality control inspections may be performed by a workman's first line supervisor; however, quality assurance acceptance is not performed by the first line supervisor or anyone reporting to him. Qualification of these individuals in accordance with appropriate requirements is documented. Provisions for Code Authorized Inspection are included when required.

Examinations, measurements, or tests are performed for work operations where necessary. Procurement documents for materials or products specify examinations, measurements, or tests to be performed for each work operations where necessary to assure quality. Storeroom personnel perform receiving inspection on procured materials as appropriate per the procurement documents, specifications, procedures, and instructions. Storeroom personnel are knowledgeable of the requirements of the quality assurance program. Questions regarding quality assurance are referred to the QA Coordinator or QA Section. Procurement documents for materials or products, for which direct inspection is impossible or disadvantageous, specify provisions for indirect control by monitoring processing methods, equipment, and personnel. When control is inadequate without both inspection and process monitoring, provisions for both are included. Mandatory hold points are specified and used where required.

Section 3.4.2. of ANSI N18.7-1976 states that personnel performing inspection, examination, and testing activities shall be qualified to ANSI N18.1-1971, or shall meet the requirements of ANSI N45.2.6-1973. With few exceptions, Point Beach personnel meet or exceed the qualification requirements of ANSI N18.1-1971, and are therefore qualified to perform plant inspection, examination, and testing activities. Those few

exceptions are in job functions not discussed in ANSI N18.1-1971 and certain inspection and test personnel who work for contractors as discussed below.

All positions at Point Beach have been evaluated to determine the minimum qualification requirements. The areas considered during the evaluation included regulation, code and standard requirements, education and training, work experience, and physical condition. Applicants for positions at Point Beach who do not meet the minimum requirements, or who do not pass a battery of preemployment aptitude tests are not considered for the position. Additionally, prior to employment, all plant personnel are interviewed by senior plant management and in most cases are interviewed by the Manager-Point Beach Nuclear Plant who makes the final determination of acceptability. There is only one level of qualification at Point Beach, not three levels as indicated in ANSI N45.2.6-1973.

When the extent of the maintenance or modification is such that it must be performed by contract, the potential contractor's QA program is evaluated by the QA Section to determine its acceptability. Included in the evaluation is consideration of the qualifications of inspection and test personnel. In cases where it is determined that a contractor's organization is suitably qualified in all other respects, including qualified personnel, a qualification and certification program which meets all the requirements of ANSI N45.2.6-1973 is not insisted upon. Implementation of the audit program assures qualification of such personnel.

All nondestructive examination personnel are required to be qualified in accordance with the appropriate sections of SNT-TC-1A.

Section 3.2 of ANSI N18.7-1976 requires that verification of conformance be performed by individuals other than those who performed or directly supervised the work. It can be demonstrated that verification of conformance is conducted in this manner at Point Beach.

Section 5.2.17 of ANSI N18.7-1976 requires inspections for modifications

and non-routine maintenance be performed in a manner similar to that associated with construction phase activities. Modifications and non-routine maintenance for which outside contractors are utilized are performed in this manner. Modifications and non-routine maintenance items within the capablities of the onsite operating organization are performed as a routine maintenance activity.

1.8.11 TEST CONTROL

Procedures and practices are established and documented to provide a program of periodic testing and continuing surveillance to demonstrate that structures, systems, and components continue to perform satisfactorily in service. The measures require tests to be performed in accordance with written test procedures which incorporate the requirements and acceptance limits (except as noted in Section 1.8.5) from applicable design documents by appropriately trained and qualified personnel. Test procedures include provisions for assuring that all prerequisites for the test have been met, that adequate test instrumentation is available and used, and the test is performed under suitable environmental conditions. Test results are documented and evaluated to assure test requirements have been satisfied. These measures require replacement or modified structures, systems and components to be subjected to sufficient proof, preoperational, and operational testing to demonstrate that they will perform satisfactorily in service.

1.8.12 CONTROL OF MEASURING AND TEST EQUIPMENT

Positively controlled procedures and practices are established and documented to assure that tools, gauges, instruments, and other measuring and testing devices used in activities affecting quality are properly indentified, controlled, calibrated, and adjusted at specific periods to maintain accuracy within necessary limits. Calibration procedures specify standards to be used for performing the calibration; procedure preparation assures that standards used have greater accuracy than the item being calibrated. These measures provide for identification of the equipment and associated records and appropriate corrective action when out-of-calibration conditions are noted.

1.8.13 HANDLING, STORAGE, AND SHIPPING

Procedures and practices are established and documented to control the handling, storage, shipping, cleaning, and preservation of material and equipment in accordance with work and inspection instructions by qualified individuals to prevent damage or deterioration and preclude loss of identification. The measures include specification and use, when necessary, of special protective environments, such as inert gas atmosphere, specific moisture content, and temperature levels.

1.8.14 INSPECTION, TEST, AND OPERATING STATUS

Procedures and practices are established and documented to indicate by suitable means, the status of inspections and tests to be performed upon individual items. These measures include provisions for the identification of items which have satisfactorily passed required inspections and tests when necessary to preclude inadvertent bypassing of such inspections and tests. Procedural controls to perform operations out of sequence are included in QA Volume I. These measures also include provisions for indicating nonconforming, inoperative, or malfunctioning components within a system to prevent inadvertent operation.

1.8.15 NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

Procedures and practices are established and documented to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation. For purchased material, parts, or components, these measures may include timely return of nonconforming materials, parts, or components to the vendor for replacement with satisfactory items. Formal nonconformance control systems are in place to assure control and disposition of nonconforming items including adherence to 10CFR21 as necessary.

Maintenance request forms provide identification and control of nonconforming items requiring repair or rework to be returned to satisfactory condition. Where a safety-related component is required to be temporarily or permanently changed, such that it no longer complies with the original and approved design, such changes, with required approvals, are made via the approved modification request procedure.

The QA Section has established provisions for documenting and dispositioning nonconforming items or conditions, which are identified during inspection, surveillance or auditing activities.

1.8.16 CORRECTIVE ACTION

Procedures and practices are established and documented to assure that conditions adverse to quality; such as failures, malfunctions, deficiencies, deviations, defective material, and equipment and nonconformances; are promptly identified and corrected. In the case of significant conditions adverse to quality, these measures include assurance that the cause of the condition is determined and corrective action taken to preclude repetition. These include provisions for identification of the significant condition adverse to quality, the cause of the condition and the corrective action taken to be documented and reported to appropriate levels of management. Provisions are included for followup reviews to verify proper implementation of corrective actions and to close out the corrective action documentation.

1.8.17 QUALITY ASSURANCE RECORDS

Procedures and practices are established and documented to assure that sufficient records are generated and maintained to furnish evidence of activities affecting quality. Where practicable the guidelines of ANSI N45.2.9-1974 apply. The records consist of at least operating logs and the results of reviews, inspections, tests, monitoring, work performance, and materials analyses. Also included are closely related data such as qualifications of personnel, procedures and equipment. Inspection and test records include, as a minimum, identity of the inspector or data recorder, the type of observation, the results and the acceptability, or action taken in connection with any deficiencies noted. Records are required to be identifiable and retrievable.

Requirements concerning records retention; such as duration, location, and assigned responsibility; are established to be consistent with applicable regulatory requirements. A record storage facility is used with controlled access to prevent destruction of records by fire, flooding,

theft, and deterioration by environmental conditions, such as temperature or humidity.

In 1971, Point Beach recognized the need to improve its records management program in the area of preservation of records. In the absence of any guidance in the form of regulatory guides or national standards, it was decided to generally follow the requirements of NFPA 232-1970.

The requirements of NFPA 232-1970 were reviewed in light of importance of the records being stored and the risk of destruction of the records. It was determined that the records being stored required positive protection as many were irreplaceable. Possible locations for records storage facility were studied, and it was determined that the lower level of the Energy Information Center located on the plant grounds, offered an ideal location for a records storage facility.

This location was chosen as it was an area of minimum weight of combustibles and the building itself was fire resistant. It was determined, based on the above factors, that a separate room would be constructed in the lower level of the Energy Information Center to provide further protection.

The room was built to meet Wisconsin Administrative Code requirements for four-hour construction, and was treated to minimize the risk of water infiltration. In addition, the room was equipped with an inert gas fire suppression system which is automatically triggered by smoke or heat. Triggering of the fire suppression system also activates an alarm signal and a visible alarm which can be observed from a continuously manned guard station.

Based on the analysis of the fire hazard present in the Energy Information Center alarm system, and the sophisticated fire suppression system, it was decided that the requirement for a four-hour vault door was unnecessary. The entrance to the room is closed with a Class A 250°F labeled fire door. In addition, the fire suppression system required an electrical supply, which led to the waiving of the requirement that walls could not be penetrated by electrical conduit. The electrical supply for the

room is brought into the room via a conduit through one of the walls which has been installed to minimize the risk of fire passing through the wall via this penetration.

1.8.18 AUDITS

Procedures and practices have been established and documented to provide a comprehensive system of planned and periodic audits to verify compliance with all aspects of the quality assurance program and to determine the effectiveness of the program.

Audits are performed in accordance with written procedures or checklists by appropriately trained personnel not having direct responsibilities in the areas being audited. The in-plant QA program is audited periodically, normally quarterly, by the QA Coordinator or his designee and quarterly by the QA Section. The QA Section also performs audits under the cognizance of the Off-Site Review Committee as required by Technical Specification 15.6. On-site and off-site contractor audits are timed as appropriate for the work scheduled.

Audit results are documented and reviewed by management personnel having responsibility in the area audited. Audit reports are routed to managementment responsible for correcting any unsatisfactory items noted. Follow-up action, including reaudit of deficient areas, is taken when indicated. When follow-up audits reveal repetitive occurrences which reflect possible trends adverse to the effectiveness of the QA program, these results shall be reported to the appropriate management level to effect corrective action.

In a footnote to Section 4.5 of ANSI N18.7-1976, it is stated that the provisions of proposed ANSI N45.2.12, Draft 4, Revision 2, dated January 1, 1976, shall be used for audits performed to meet the requirements of Section 4.5. Section 3.2 of ANSI N18.7-1976 recognizes that quality assurance is an interdisciplinary function and that advantages may accrue from having reviews of certain plant functions performed by technically qualified personnel, in lieu of quality assurance personnel, because of special technical competence which may be required to perform the review. WE strongly endorses this position and has assigned certain review and

audit functions within the plant to technically qualified personnel in lieu of quality assurance personnel.

Sufficient audits are performed in accordance with the provisions of ANSI N45.2.12 to meet the requirements therein; however, the technical audits are not performed under ANSI N45.2.12 requirements.

TABLE 1.8-1

COMMITMENT TO REGULATORY GUIDES AND ANSI STANDARDS

1. Regulatory Guide 1.8 (Safety Guide 8) dated March 10, 1971

   Full commitment except that Point Beach commits to ANSI N18.1-1971 in lieu of the proposed ANSI N18.1 dated June 22, 1970.

2. Regulatory Guide 1.28 (Safety Guide 28) dated June 7, 1972

   ANSI N18.7-1976 states in part, "This standard fully and completely describes the general requirements and guidelines of ANSI N45.2-1971 as those requirements, and guidelines apply during the operational phase of plant life." As such, commitment to ANSI N18.7-1976 for Point Beach obviates the need to commit to Regulatory Guide 1.28 which endorses ANSI N45.2-1971.

   Point Beach does, however, commit to the position of Regulatory Guide 1.28 to the extent of requiring its vendors to have quality assurance programs which meet the appropriate requirements of ANSI N45.2-1971 as mentioned in Section 5.2.13.1 of ANSI N18.7-1976.

3. Regulatory Guide 1.30 (Safety Guide 30) dated August 11, 1972

   Commitment to follow the position of Regulatory Gude 1.30, which endorses and supplements ANSI N45.2.4-1972, for activities occuring during the operational phase that are comparable in nature and extent to related activities during construction.

4. Regulatory Guide 1.37 dated March 16, 1973

   Commitment to follow the position of Regulatory Guide 1.37, which endorses and supplements ANSI N45.2.1-1973, for activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction.

TABLE 1.8-1 (Continued)

5. Regulatory Guide 1.38, Revision 1, dated October 1976

   Commitment to follow the position of Regulatory Guide 1.38, which endorses and supplements ANSI N45.2.2-1972, for activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction.

6. Regulatory Guide 1.39, Revision 1, dated October 1976

   Commitment to follow the position of Regulatory Guide 1.39, which endorses and supplements ANSI N45.2.3-1973, for activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction except that Point Beach does not commit to the documentation requirements of ANSI N45.2.3-1973 and provides an alternative to the housekeeping zone requirements therein. Description of these differences are provided in Section 1.8.2.4.

7. Regulatory Guide 1.54 dated June 1973

   Commitment to follow the position of Regulatory Guide 1.54, which endorses and supplements ANSI N101.4-1972, for activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction.

8. Regulatory Guide 1.58 dated August 1973

   Commitment to follow the position of Regulatory Guide 1.58, which endorses and supplements ANSI N45.2.6-1973, for activities occurring in the operational phase that are comparable in nature and extent to related activities during construction, except that Point Beach does not commit to the levels of qualification nor separate certification requirements of ANSI N45.2.6-1973. Description of these differences are provided in Section 1.8.10.6.

9. Regulatory Guide 1.64 dated October 1973

Commitment to follow the position of Regulatory Guide 1.64, except that Point Beach commits to ANSI N45.2.11-1974 in lieu of Draft 3 Rev. 1 dated July 1973, for design activities associated with modification of safety-related structures, systems and components.

10. Regulatory Guide 1.74 dated February 1974

Full commitment.

11. Regulatory Guide 1.88, Revision 1, dated December 1975

Commitment to follow the position of Regulatory Guide 1.88, which endorses and supplements ANSI N45.2.9-1974 and NFPA 232-1970. Point Beach has determined that the existing records storage facility provides a level of protection to the vital records at the plant which is equivalent to the requirements of Regulatory Guide 1.88. Description of the differences are provided in Section 1.8.17.5.

12. Regulatory Guide 1.94 dated April 1976

Commitment to follow the position of Regulatory Guide 1.94, which endorses and supplements ANSI N45.2.5-1974, for activities occurring during the operational phase that are comparable in nature and extent to related activities occurring during construction.

13. Regulatory Guide 1.146 dated August 1980.

Commitment to follow the position of Regulatory Guide 1.146, which endorses ANSI N45.2.23, for audits of in-plant activities which are performed on Point Beach Nuclear Plant organizations.

14. ANSI 18.7-1976
Refer to Section 1.8.0 for details of the Point Beach commitment.

TABLE 1.8-2

SUBSECTIONS OF SECTION 1.8
APPLICABLE TO THE FIRE
PROTECTION PROGRAM

Subject	Subsection
Administrative and Organizational	1.8.1, 1.8.2
Design and Procurement Document Controls	1.8.3, 1.8.4
Instructions, Procedures and Drawings	1.8.5
Control of Purchased Materials, Equipment and Services	1.8.7, 1.8.10
Inspection	1.8.10
Test and Test Control	1.8.11
Inspection, Test and Operating Status	1.8.14
Nonconforming Items	1.8.15
Corrective Action	1.8.16
Records	1.8.17
Audits	1.8.1, 1.8.18

TABLE 1.8-3

SUBSECTIONS OF SECTION 1.8 APPLICABLE TO SHIPPING PACKAGES FOR RADIOACTIVE MATERIALS (10 CFR 71, SUBPART H)

Subject	Subsection
Organization	1.8.1
Quality Assurance Program	1.8.2
Design Control	*not applicable
Procurement Document Control	1.8.4
Instructions, Procedures and Drawings	1.8.5
Document Control	1.8.6
Control of Purchased Material, Equipment and Services	1.8.7
Identification and Control of Materials, Parts and Components	1.8.8
Control of Special Processes	1.8.9
Inspection	1.8.10
Test Control	*not applicable
Control of Measuring and Test Equipment	1.8.12
Handling, Storage and Shipping	1.8.13
Inspection, Test and Operating Status	1.8.14
Nonconforming Materials, Parts or Components	1.8.15
Corrective Action	1.8.16
Quality Assurance Records	1.8.17
Audits	1.8.18

* Design and testing control are activities which are not normally performed by Point Beach Nuclear Plant personnel. However, these activities are imposed on suppliers providing radioactive material packaging or associated services, as appropriate.

June, 1984

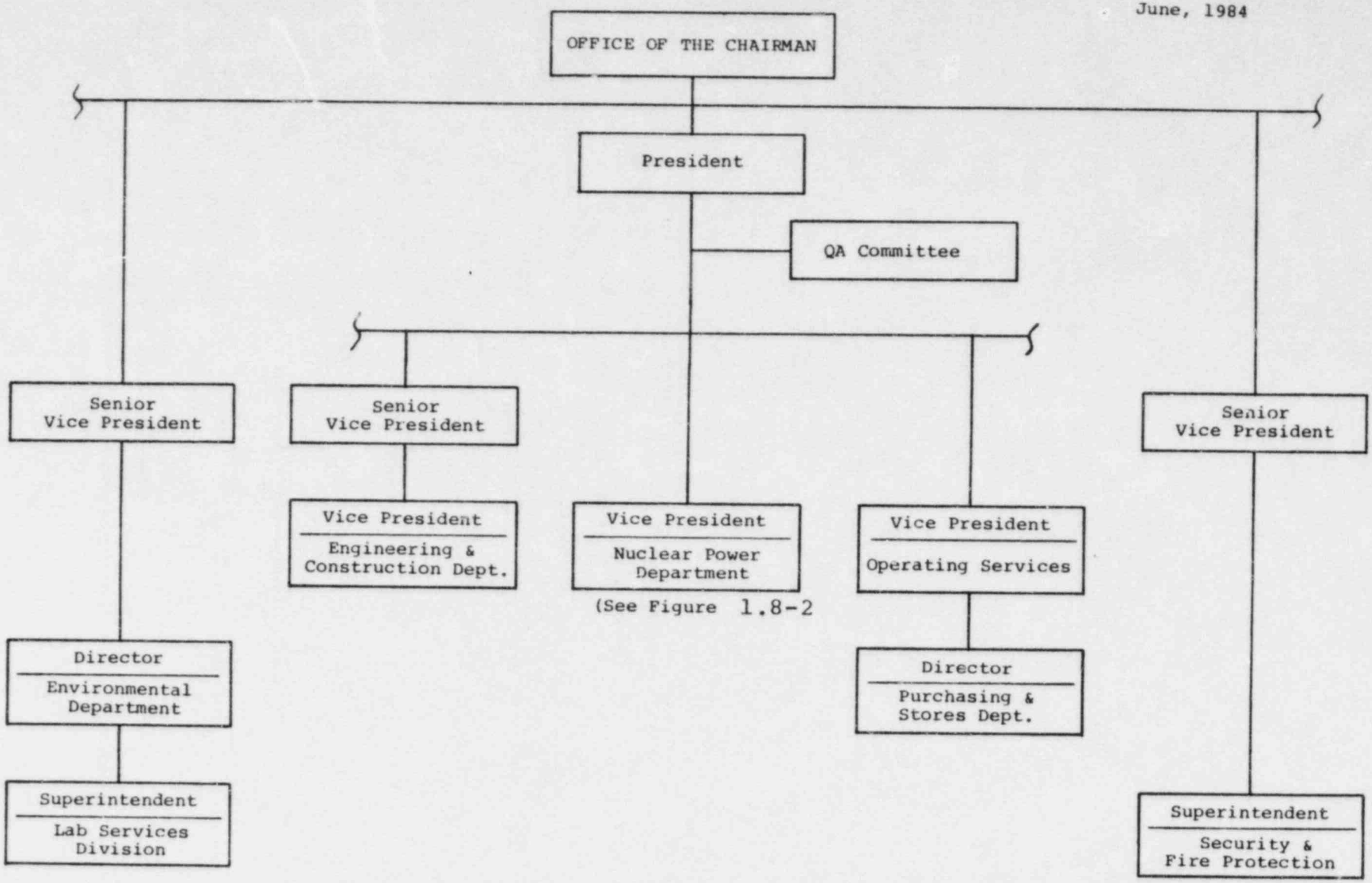

Figure 1.8-1 WISCONSIN ELECTRIC POWER COMPANY ORGANIZATION
WITH QUALITY ASSURANCE INTERFACE TO POINT BEACH NUCLEAR PLANT

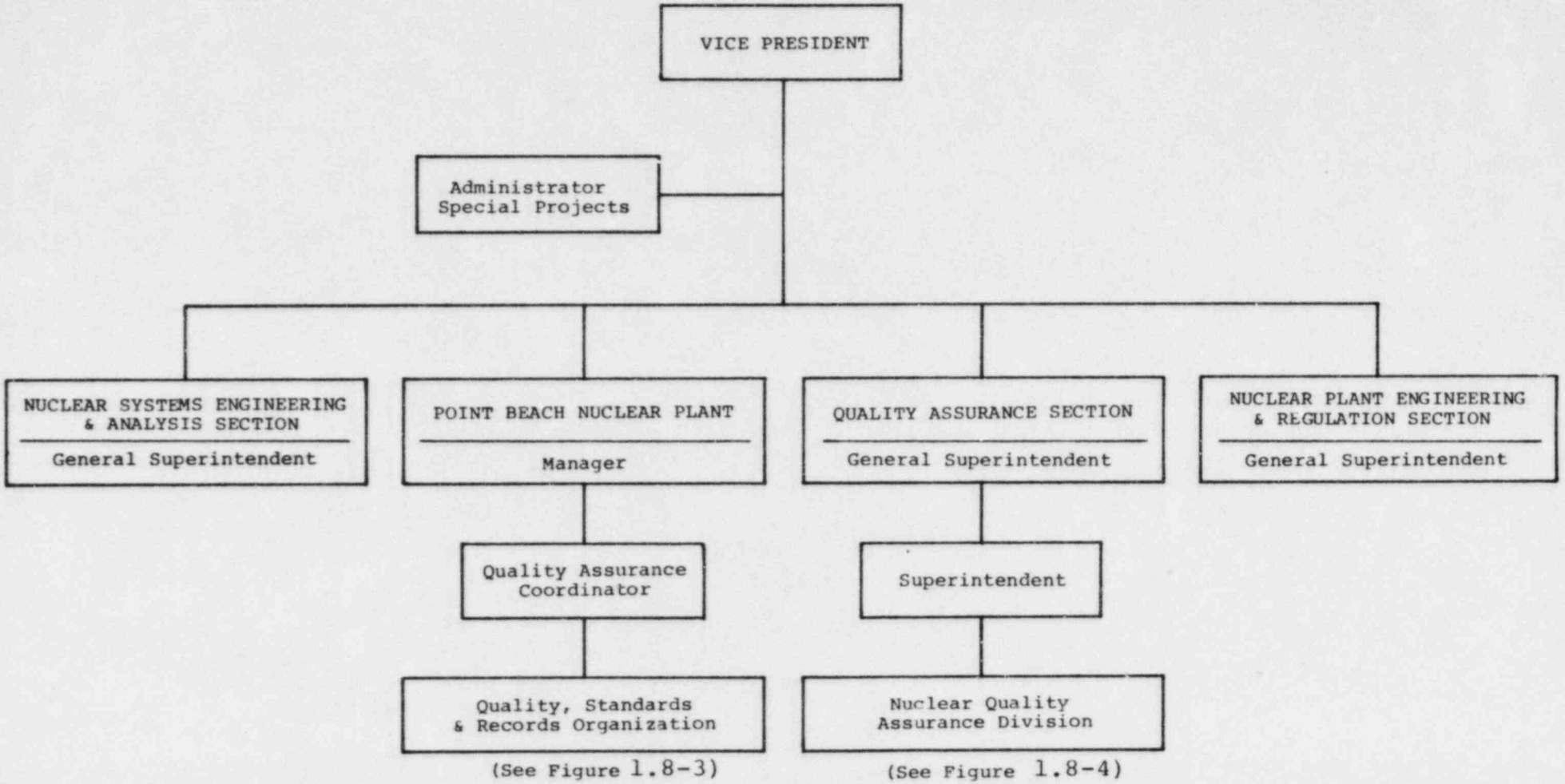

Figure 1.8-2 NUCLEAR POWER DEPARTMENT ORGANIZATION

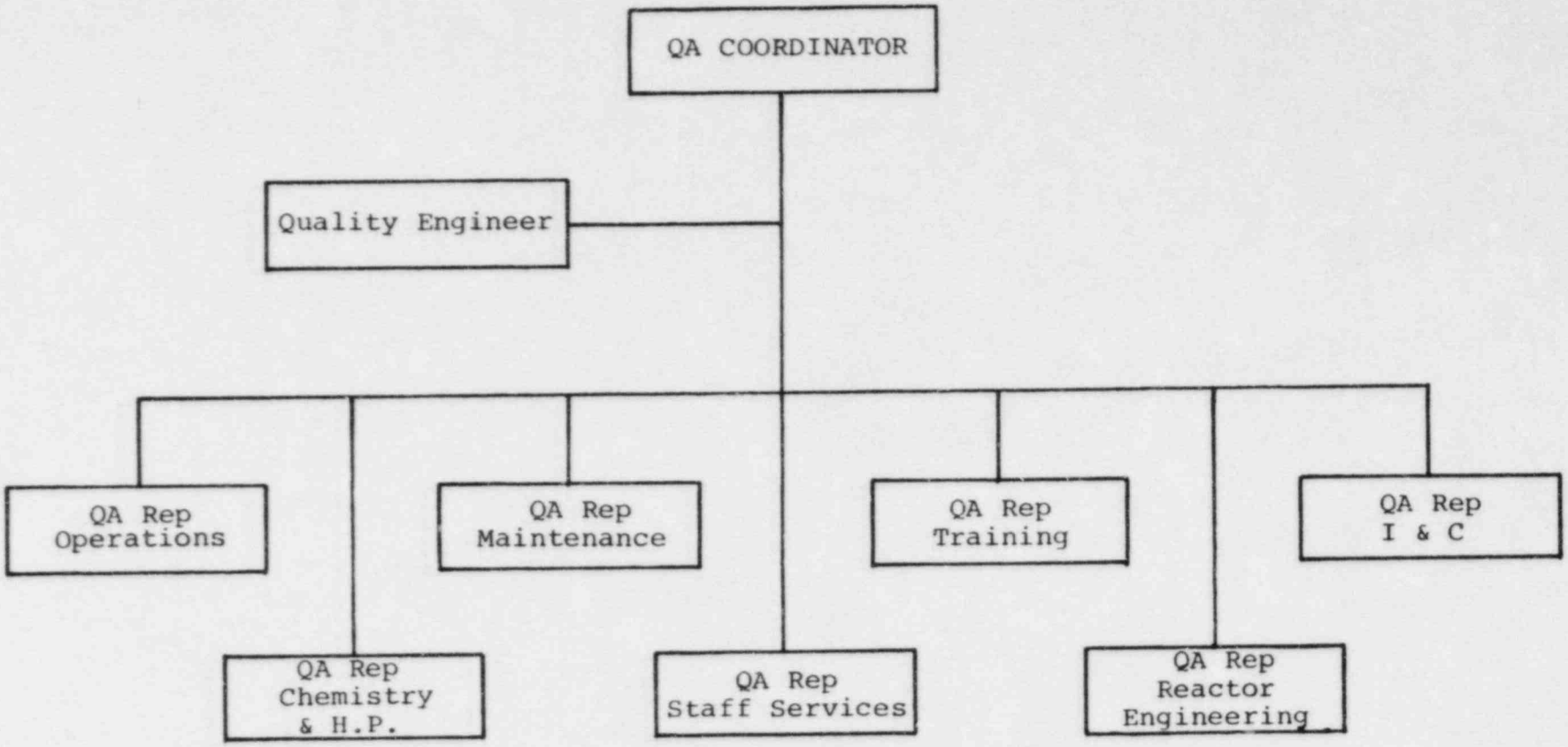

Figure 1.8-3 PBNP QUALITY, STANDARDS & RECORDS ORGANIZATION

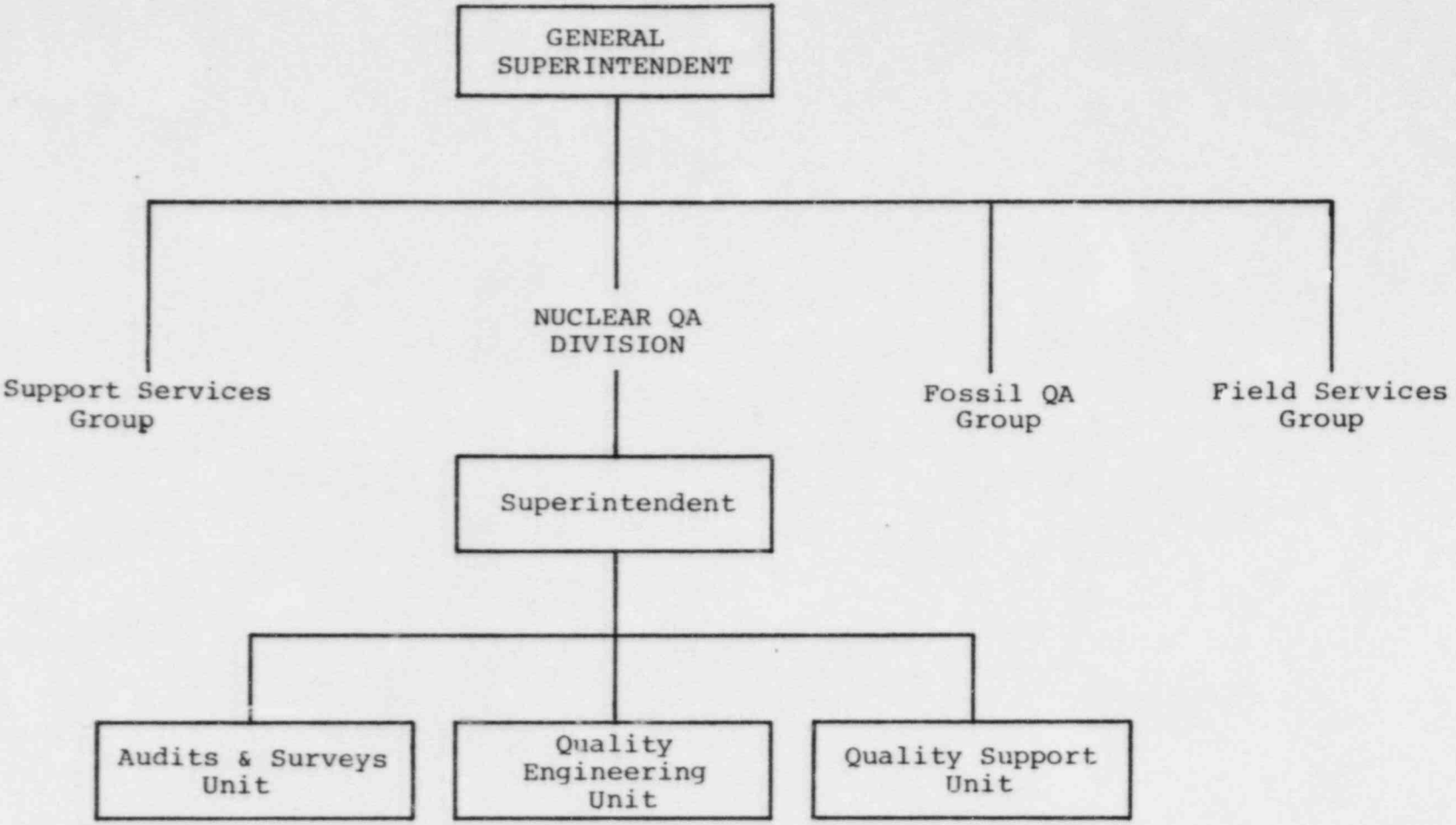

Figure 1.8-4 QUALITY ASSURANCE SECTION ORGANIZATION