UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

In the Matter of

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Washington Public Power Supply System Docket No. 50-513

(WPPSS Nuclear Project No. 4)

AFFIDAVIT OF DUANE L. RENBERGER PEGARDING MANAGEMENT ORGANIZATION AND QUALITY ASSURANCE

In an effort to assure that the evidentiary record in this proceeding is complete and reflects the most current information, the Washington Public Power Supply System ("Applicant") herein provides a summary of a recent change in management organization. This change was prompted by the perceived needs of the various nuclear projects being constructed by the Applicant for a broader top management organization.

In Chapter 13 and 17 of the Preliminary Safety Analysis Report (PSAR) for WPPSS Nuclear Projects Nos. 1 and 4, the management organization set forth includes several Division Managers (<u>e.g.</u>, Finance, Operations, Technical and Projects Divisions), all of whom reported to the Deputy Managing Director in the office of the Managing Director.

This organization was established at a time when Applicant was engaged in constructing a single nuclear project (WPPSS Nuclear Project No. 2). The Applicant is now in the process of constructing five nuclear projects, which are at various stages of construction. In these circumstances, it was determined that a revision in top management organization was appropriate to provide top management guidance and control for all nuclear projects.

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Accordingly, the Applicant has revised the structure of its top management organization. Attached hereto are organization charts which reflect these organization changes. Under the revised organization, the duties of the Deputy Managing Director have been assigned to three Assistant Directors who have responsibility for certain organizational divisions. The Assistant Director for Projects now has responsibility for each of the Projects Divisions and for construction activities. The Assistant Director for Generation and Technology has responsibility for Technical, Engineering, Plant Operations, and Generation Services Divisions. The Assistant Director for Finance and Administration has responsibility for Finance, Administration, and Materials Management Divisions (Figure 1).

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Significantly, the reorganization was effected in a manner which assures the continued separation of cost and schedule responsibility from technical and quality assurance responsibility. As is noted on the attached organization charts, the WPPSS QA Department Manager reports to the Manager, Technical Division, and has direct access to the Assistant Director, Generation and Technology, and other Assistant Directors and the Managing Director. The Manager of QA is responsible for developing and administering the WPPSS QA Program which he performs through the Quality Services Supervisor, Project QA Managers for each project and the Operational QA Manager as shown on Figure 2. Development of the program and auditing of its implementation is the function of Quality Services. The Project QA sections, each headed by a Project QA Manager, are responsible for administering the implementation of the program at the project level including interfacing with the AE/CM and the NSSS Contractor. Operational QA has no designconstruction phase responsibilities.

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The Project Manager does not exercise control over the activities of the Project Quality Assurance staff. The Project Manager provides coordination of QA activities with project activities (Figure 3). Administrative and technical direction regarding specific implementation of the QA Program come from the Manager, Quality Assurance. The project management and project QA organizations are both audited by the Quality Services Section for the effectiveness of their implementation of the QA Program.

In accordance with the "Management Statement" (Attachment 1), which is included in the preface to each WPPSS QA Program Manual, the Quality Assurance staff has complete authority, including stop work authority, to assure that design and construction activities conform with quality requirements.

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In the case of conflicts between the Project QA Organization and the Project Management Organization, the Project QA Manager has direct access to the Manager, Quality Assurance, and thence to successively higher levels of WPPSS Management until the problem is resolved.

The NRC staff has reviewed the above described management reorganization in the context of the WNP-3/5 PSAR Review (Amendment 40). The staff reported favorably on the reorganization as it relates to the Applicant's technical qualifications in an affidavit submitted by Mr. Frederick R. Allenspach (Staff Exhibit 20, WNP-3/5). The staff reported favorably on reorganization as it relates to the Applicant's Quality Assurance Program in an affidavit submitted by Mr. John R. Costello (Staff Exhibit 19, WNP-3/5).

Effective December 1, 1977, the Engineering Division was reorganized as shown on Figure 4. This new organization basically represents a realignment of the Central Engineering, Engineering Programs, and Safety and Analysis Departments from the prior organization. This realignment is

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intended to strengthen the design engineering support for all WPPSS projects.

The Applicant commits, as a post construction permit item, to amend the PSAR to reflect the above described changes in Management Organization and Quality Assurance.

D. L. Renberger

Assistant Director Generation and Technology

Subscribed and sworn before me this 2nd day of Successful, 1977

Notary Public in and for the State of Washington

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

MANAGEMENT STATEMENT

Washington Public Power Supply System (WPPSS) is committed to the WPPSS Quality Assurance Program to assure that WPPSS Nuclear Projects are designed, constructed and operated safely, reliably and efficiently. Adherence to the WPPSS Quality Assurance Program as defined in the (Design and Construction) Quality Assurance Program Manual, the Operational Quality Assurance Program Description and implementing procedures and instructions by all WPPSS personnel is mandatory.

The guidance and criteria presented in the Quality Assurance Program Manuals are official WPPSS policies: as indicated by approval signatures of the Assistant Director, Generation and Technology, the Manager, Technical Division and the Manager, Quality Assurance. The scope of activities controlled by the WFPSS Quality Assurance Program includes engineering, design, procurement, fabrication, manufacture, installation, erection, construction, maintenance modification, testing, and operation of applicable structures, systems and components of WPPSS Nuclear Projects.

In addition, WPPSS personnel shall assure that specifications and contracts include requirements for implementation by consultants, vendors, fabricators, constructors and subcontractors of all applicable requirements of the WPPSS Quality Assurance Program. Items required by design specification to meet ASME Code, Section III, Divisions 1 and/or 2, shall be designed, manufactured and assembled by organizations holding the applicable ASME Certificate of Authorization. These items and systems shall be stamped and the required data reports issued in accordance with ASME Code, Section III requirements.

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The Manager, Quality Assurance, assisted by members of the Quality Assurance Department, is responsible for developing, administering and assuring implementation of the WPPSS Quality Assurance Program. The WPPSS Quality Assurance Department has the responsibility and authority, including Stop Work Authority to perform the actions necessary to accomplish their mandate as delineated in the Quality Assurance Program Manuals.

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N. O. Strand Managing Director

FIGURE 1

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