Washington Public Power Supply System

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February 26, 1988

G93-88-063

Docket No. 50-508

U.S. Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

Subject:

NUCLEAR PROJECT 3

CHANGES TO THE QUALITY ASSURANCE

PROGRAM DESCRIPTION

References:

- a) Supply System Letter (GO3-87-301), G. C. Sorensen to U.S. NRC Document Control Desk, subject "Changes to the Quality Assurance Program Description", dated September 30, 1987
- b) Supply System Letter (GO3-88-039), G. C. Sorensen to U.S. NRC Document Control Desk, subject "Amendment 7 to the Final Safety Analysis Report (FSAR)", dated February 16, 1988.

Reference a) transmitted the addition to the FSAR of Section 17.3, "Quality Assurance During Long-term Preservation". Since the above notification, there have been changes and corrections made to the Quality Assurance Program Description. Both Section 17.3 and the enclosed changes have been incorporated into Amendment No. 7 of the FSAR (Reference b).

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If you have any questions please contact Mr. D. W. Coleman, WNP-3 Project Licensing Manager, phone (206) 482-4428, Ext. 5336.

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DWC/tn

Attachments

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17.3 QUALITY ASSURANCE DURING LONG-TERM PRESERVATION

In the Summer of 1987 the Supply System and Ebasco site organizations, including the Quality Assurance organization, merged. The Supply System and Ebasco Corporate office functions and responsibilities, including AE functions and responsibilities maintain their individual autonment and remain un— Gutonoma changed. This section describes the Project Quality Assurance Program as it pertains to Corporate and the WNP-3 site activities during the extended construction delay. The Project Quality Assurance Program meets or exceeds 10CFR50, Appendix 8, and ANSI N45.2, 1971 requirements. The Quality Assurance Program is established by the Supply System Design and Construction Quality Assurance Manual WMC-015, and is in accordance with the Ebasco WNP-3 QA Manual ETR 1001 and the Combustion Engineering (NSSS Vendor) Quality Assurance Program detailed in CESSAR-F, Chapter 17. The Quality Program responsibilities described in FSAR Chapter 17.1 and Chapter 17.2 are suspended until the restart of construction.

17.3.1 ORGANIZATION

Section 17.3.1.1 describes the organizational relationships within the Supply System and assigns the authorities and responsibilities for the administration and implementation of the Quality Assurance Program. Assigned authorities and responsibilities demonstrate the organizational freedom of Quality Assurance. This organizational freedom is accomplished through Corporate and Project structures which provide independence from Supply System organizations responsible for construction. Section 17.3.1.2 describes the site organization and responsibilities.

At the Corporate Level, the Director and staff of Licensing and Assurance, and at the Project (jobsite) Level, the Project QA Manager and staff, are completely free from the responsibility of cost and scheduling during "construction." The Director, Licensing and Assurance, and the Project QA Manager have the freedom and authority to identify quality-related problems, initiate corrective actions (including stop work) and recommend or provide solutions and to verify the implementation of corrective actions.

The WNP-3 project is adminstered by a Site Manager. The Site Manager is directly accountable to the Manager of Construction Projects and is responsible for the safe long-term preservation of the project.

The integrated organizations of the Supply System/Ebasco are presented on Figures 17.3-1, 17.3-2, and 17.3-3. The functional responsibilities for the implementation of the Quality Assurance Program are assigned as follows:

17.3.1.1 Supply System Corporate

17.3.1.1.1 Managing Director

The Managing Director of the Supply System has the ultimate responsibility for the Quality Assurance Program. The Managing Director shall assure that the program is implemented and maintained by assigning the appropriate authority and responsibility to the Director of Licensing and Assurance.

17.3.1.1.2 Deputy Managing Director

The Deputy Managing Director has delegated authority to implement policies of the Managing Director. The Deputy Managing Director reports to the Managing Director and is responsible for:

- Coordinating and integrating the activities of Supply System organizations.
- Supporting and advising the Managing Director on the performance of Supply System functions and evaluations of such.
- Acting for the Managing Director, as required.

17.3.1.1.3 Chief Financial Officer

The Chief Financial Officer reports to the Managing Director, and is responsible for the development of Corporate material management and procurement policy and the procurement and control of Corporate multiple project and specialized materials and related services required to support the design and construction of Supply System nuclear power plants.

17.3.1.1.4 Director, Engineering

The Director, Engineering, reports to the Managing Director and is responsible for:

- a) Providing technical and engineering support to the project.
- Assisting the Project Engineering organization in providing technical direction to the Architect Engineer.
- Assisting the project in performing technical overview of Supply System activities.
- d) ASME Code consultation to the project, including interfacing with ASME, as the Owner.
- Performing and managing selected technical programs, having applicability to several projects.

- f) Providing independent technical evaluations when requested by the Managing Director.
- g) Overall Supply System engineering records management policy. Implementation of the policy with regards to functions described in this manual is the responsibility of all Directorates, as applicable.

17.3.1.1.5 Assistant Managing Director, Operations

The Assistant Managing Director, Operations reports to the Managing Director and is responsible for the safe and efficient operation of all Supply System operating power plants.

17.3.1.1.6 Manager of Construction Projects

The Manager of Construction Projects reports to the Director, Engineering and is responsible for development and implementation of policies and programs supporting the long-term preservation phase.

the Manager of Construction Projects carries out his responsibilities through the Site Managers and Engineering Managers at WNP-1 and WNP-3.

17.3.1.1.7 Manager, Support Services

The Manager, Support Services, reports to the Assistant Managing Director, Operations, and is responsible for the development and implementation of policies and programs which support design, construction and operation of Supply System plants. Areas in which the Manager of Support Services provides support for the projects include industrial safety and fire protection, administration, security and radiological programs. He is also responsible for ensuring that Supply System Standards Laboratory calibration of measuring and test equipment is performed in accordance with approved procedures which establish calibration frequencies, procedures used, recall methods, identification requirements, tolerances and records required to establish equipment history and calibration data.

17.3.1.1.8 Director, Licensing and Assurance

The Director, Licensing and Assurance reports to the Managing Director and is responsible for the overall development, implementation and verification of the Supply System Quality Assurance and Nuclear Safety and Regulatory Programs to ensure compliance with regulations, codes and standards. These responsibilities include:

Interpretation of ASME Section III, Owners Responsibilities and Section XI Code Quality Assurance requirements and Quality Assurance manual requirements. Section III consultation with the N Certificate Holder on other ASME Code requirements.

- Definition, approval, revision and controlled distribution of Supply System Quality Assurance manuals to ensure that the manuals adequately describe requirements.
- Approval of all corporate and project quality affecting implementing procedures and instructions and Project Quality Assurance Instructions.
- d) Determining the adequacy and effectiveness of program implementation.
- Apprising the Managing Director of the effectiveness of the Quality Assurance and Nuclear Safety and Regulatory Programs by periodic reporting of activities, trends and problems, through established corrective action systems.
- Exercising the authority vested in the Quality Assurance organization to cause the acceptance or rejection of materials and components based on conformance verification to engineering requirements and the requirements of the ASME Code, Section III Owners responsibilities and Section XI.
- Ensuring that Quality Assurance and Nuclear Safety and Regulatory policies and programs provide Project Quality Assurance and Licensing Managers the freedom to inform the Director of Licensing and Assurance of significant conditions affecting quality.
- h) Maintaining cognizance of changing regulatory requirements and providing controlled interface between the Supply System and Regulatory agencies so as to assure that commitment documents receive the necessary degree and depth of review prior to transmittal.
- Exercising authority to stop nonconforming work of any Supply System Contractor or Supplier organization; and notification of the Authorized Nuclear Inspector (ANI) of the work stoppage for ASME activities.
- Quality Assurance and Nuclear Safety and Regulatory oriented communications and commitments directed to Supply System direct contracts and the Authorized Inspection Agency, for Owners Section III, Section VIII, and Section XI activities.
- Ensuring that significant conditions affecting quality or Nuclear Safety and Regulatory Programs, which are identified by Project Quality Assurance and which are addressed to the Licensing and Assurance Directorate for resolution, are adequately investigated and/or corrected.
- Providing licensing support functions in such areas as acquisition and maintenance of nuclear power plant construction permits and operating licenses.

m) Administrating Supply System Corporate and Project Quality Assurance and Nuclear Safety and Regulatory Program activities.

The Director, Licensing and Assurance has effective communication channels with all Supply System senior management positions and has no duties or responsibilities unrelated to quality/safety assurance and licensing. To accomplish the above defined role, the Director, Licensing and Assurance operates through the Manager, Programs and Audits; the Manager, Regulatory Programs, and Manager, and Operational Assurance Programs.

17.3.1.1.8.1 Manager, Programs and Audits

The Manager, Programs and Audits reports to the Director, Licensing and Assurance and is responsible for the development and implementation of the Quality Assurance program at WNP-3 during the long-term preservation phase. He is also responsible for Procurement QA; QA functions associated with plant modifications; qualification and certification of Supply System nondestructive examination and inspection personnel and other personnel requiring certification; surveillance of nondestructive examination and inspection activities; has the lead role for acquiring and maintaining ASME Certificates of Authorization, and maintains an organization of qualified auditors responsible for verifying implementation of the Quality Assurance Program.

- a) Ensuring that ASME Code requirements are properly interpreted and included in the Quality Assurance program requirements.
- Interfacing with the Authorized Nuclear Inspector (ANI), Authorized Inspection Agency for Owners Section III, VIII, and XI responsibilities and the Enforcement Authority.
- Ensuring that a written agreement with an Authorized Inspection Agency is obtained to provide for ANI Services; and that the ANI is provided free access for Owners Section III, VIII, and XI responsibilities.
- d) Ensuring that all nondestructive examination personnel involved in examination activities are certified in accordance with ASNT and/or the ASME Code.
- e) Acquisition and maintenance of ASME Certificates of Authorization and/or Owners Certificates.
- Providing for certification of Supply System personnel who perform quality affecting activities.
- g) Developing and maintaining the Supply System Design & Construction and ASME Quality Assurance Program Manual.
- h) Reviewing and approving Project Quality Assurance Instructions.

- Reviewing and concurring with offsite design documents (such as drawing and contract specification review and approval) to assure conformance to the QA Program requirements.
- j) Reviewing proposed changes to the Quality Assurance Program, defined in SAR documents, for the Director, Licensing and Assurance approval.
- k) Providing technical services to other Licensing and Assurance departments, as requested.
- Assuring Initial Quality Assurance Indoctrination and Training for Supply System personnel is accomplished.
- m) Quality Assurance functions associated with plant modifications that are comparable to activities occurring during the initial construction phase.
- n) Vendor qualification, review and concurrence with vendor furnished programs and procedures, source verification (e.g., surveillances, inspections and audits at Vendor's Facilities) and receiving inspection of vendor furnished items received at the Corporate warehouses through the Manager, Procurement Quality Assurance.
- o) Performing Quality Assurance audits of internal Supply System organizations and external organizations (e.g., AE/CM); except for Management Audits.
- Developing audit schedules and selecting qualified personnel to perform the activities of this function.
- q) Certification of Audit Team Leaders.
- r) Training of audit personnel.
- s) Participating in audits and providing overview of AE activities.
- Periodic review of Corporate and Project audit reports to identify any quality trends which may constitute a need for a corrective action.
- u) Maintenance of audit records.

17.3.1.1.8.2 Manager, Regulatory Programs

The Manager, Regulatory Programs, reports to the Director, Licensing and Assurance, and is responsible for the development and implementation of policies and programs which support design, construction and operation of Supply System plants in the area of Nuclear Licensing. Areas in which the Manager of Regulatory Programs provides support for the projects include

environmental compliance and licensing. The Manager of Regulatory Programs is responsible for establishment and maintenance of Supply System/regulatory interfaces and assuring that nuclear licensing transmittals receive an adequate, competent and timely review prior to making commitments.

17.3.1.2 WNP-3 Site, Supply System/Ebasco Organization

The WNP-3 organization, managed by the Site Manager and Deputy Site Manager, is comprised of a Support Manager, Technical Manager, Plant Preservation Manager and Preservation Engineering Manager, who report directly to the Site Manager/Deputy Site Manager. Quality Assurance, Engineering, and Safety are matrixed to the Site Manager/Deputy Site Manager but report administratively to other Directorates. For matrixed functions, the Site Manager/Deputy Site Manager establish functional priorities and manage their contribution to the achievement of the Project plan.

The combined Supply System and Ebasco site project organization is shown in Figure 17.3-3. Functional responsibilities for the Project which includes implementation of the Quality Assurance Program are assigned as follows:

17.3.1.2.1 WNP-3 Site Manager

The WNP-3 Site Manager is directly accountable to the Manager of Construction Projects and is responsible for the following:

- Plant Preservation during the extended construction delay and completing the construction, startup, testing and completion of project exception items of WNP-3 in conformance with all quality, safety, and regulatory requirements.
- Authority for Supply System site business administration, financial and personnel matters. Provides, designates and manages Supply System overview/management for functions performed by Ebasco.

17.3.1.2.2 Deputy WNP-3 Site Manager

- The Deputy WNP-3 Site Manager is accountable to the WNP-3 Site Manager and is responsible for the following:
 - 1) Provides management and staff support to the WNP-3 Site Manager.
 - During the absence of the WNP-3 Site Manager is responsible for accomplishment of those tasks defined in Paragraph 17.3.1.1 a) with exception of those that may only be delegated to Supply System employees.

- The Deputy WNP-3 Site Manager is the Ebasco Project General Manager, the Senior Ebasco Site representative, and is accountable to the Ebasco Senior Vice President and General Manager Corporate Sponsor and responsible for the following:
 - Construction Engineer responsibilities.
 - ASME Boiler and Pressure Vessel Code Section III requirements for N-Certificate holder responsibilities.
 - Authority for Ebasco contractual and financial matters.
 - 4) Manage and administer the matrixed Ebasco Engineering Design functions.

17.3.1.2.3 Industrial Safety and Fire Protection

The Industrial Safety and Fire Protection Specialist is accountable to the Corporate Safety and Fire Protection Manager and provides support to the Project through the WNP-3 Site Manager. The Industrial Safety and Fire Protection Specialist is responsible for the following:

Assists in the development, implementation and maintenance of the Site Industrial Safety and Fire Protection Programs, Health, Fitness for Duty, and Hazard Communication. Performs periodic audits and reports on the adequacy of the site industrial safety and fire protection programs.

17.3.1.2.4 Quality Assurance

The Project maintains a site Quality Assurance organization independent from organizations responsible for engineering, procurement and construction. Personnel performing quality functions will not be responsible for or associated with others who are performing the work which they are inspecting nor will they be responsible for performing the work over which they are providing surveillance.

The Quality Assurance Manager is accountable to the Supply System Manager, Programs and Audits and provides assistance to the WNP-3 Site Manager/Deputy WNP-3 Site Manager, as part of the project management team, in implementing the quality assurance concepts into project work activities. This Manager has direct access to the Ebasco Director of Quality Assurance, to provide Ebasco Management with the appropriate level of assurance that the requirements of their Quality Assurance Program (ETR1001) are being implemented. He is responsible for conducting Project QA/QC activities in accordance with the applicable requirements of 10CFR50, Appendix B, and ANSI N45.2-1971. The Quality Assurance Manager is reponsible for the following:

- Verifies implementation of the Project Quality Assurance requirements.
- Verifies, by inspections, surveillances, and reviews that the Project organizations are implementing all applicable quality requirements.
- Reviews and approves quality affecting Project programs and control procedures.
- 4) Provides interface with NRC for inspections, notifications, and enforcement actions.
- 5) Stop work authority.
- Reporting to the WNP-3 Site Manager, the Director, Licensing and Assurance and the Ebasco Director, Quality Assurance, significant conditions adverse to quality.
- Identification and reporting of nonconformances.
- Reporting QA problems and trends to the Manager, Programs and Audits and the Ebasco Director, Quality Assurance for use in developing standards for management systems to preclude repetition of QA problems.
- Provide surveillance over material storage, handling and control activities.
- 10) Provide receiving inspection of purchased items.
- 11) Assure necessary QA documentation has been provided, reviewed and approved by appropriate personnel.
- 12) Establish and maintain controlled Quality Assurance files of quality records generated by Site QA or turned over to Site QA by others.
- 13) Assures adequate staffing and training of personnel.
- The Ebasco Assistant Quality Assurance Manager for ASME, Section III activities is accountable to the WNP-3 Quality Assurance Manager. He is also accountable to the Ebasco Director of Quality Assurance and is responsible for assuring the implementation of the Ebasco ASME, Section III Program as the representative of the N Certificate Holder. In addition, the following ASME Code, Section III duties reserved to Ebasco, may only be performed by him:

- Review and approval of the Quality Assurance Program and site quality affecting procedures.
- Provide overview of the implementation of the Ebasco approved WNP-3 ASME Code, Section III Program functions to assure compliance.
- 3) Review and approval of ASME Code Data Reports.
- 4) Assure all QA/QC personnel are appropriately qualified, trained, and certified.
- 5) Control and application of appropriate ASME N Stamp symbol.
- 6) Interface with New York for ASME Code, Section III requirements.

17.3.1.2.5 Preservation Engineering

Preservation Engineering is comprised of Ebasco Site Support Engineering (ESSE), Ebasco Resident Engineers-Discipline and Supply System Engineers. The Ebasco Home Office Engineering authority residing at Site has not been integrated but resides with Ebasco Resident Engineering and ESSE personnel assigned to Preservation Engineering. This authority is delegated in accordance with ETR-1001 and the Ebasco Engineering Procedures. The Preservation Engineering Manager, who is the ESSE Project Engineer, is responsible for administering these Ebasco Home Office engineering functions delegated to site. The Preservation Engineering Manager also implements the requirements of the applicable Project policies and procedures. The following are Preservation Engineering functions:

- a) Process and approve design changes in accordance with Ebasco Engineering Procedures and Project quality assurance requirements.
- b) Disposition and evaluate Site Nonconformance Reports.
- Monitor the Plant Preservation Program, initiate/approve changes to WMC-051 Preservation Program as required to assure adequate preservation of assets.
- d) Review Maintenance Work Requests (MWR).
- e) Prepare Work Packages for permanent plant and for significant temporary construction activities to be performed.
- f) Prepare reponses for 10CFR50.55(e) and 10CFR21 reports and other responses to the NRC.

- Provide technical support for licensing activities and assure conformance of Preservation Engineering activities to SAR or EFSEC commitments.
- h) Assure technical adequacy of Field Purchase Requisitions and performs technical evaulation of bid response packages for permanent plant materials and equipment.
- Administer the site Welding Program and assure that all permanent plant welding activities and the control of all WNP-3 filler material are in accordance with the approved Site Welding Program and quality assurance requirements.
- j) Provide engineering support for state (EFSEC) and federal environmental licensing matters.
- Assure training of assigned personnel.

17.3.1.2.6 Project Technical

provides support to the Project through a direct interface with the Site Manager with responsibilities

Project Technical is comprised of a Supply System Project Technical Manager, Engineering Manager and a Licensing Manager. The Project Technical Manager is accountable to the WNP-3 Site Manager/Deputy WNP-3 Site Manager, and is responsible for the following:

of Construction Projects

- a) Overviews AE design activities and implements the technical policies and objectives of the Supply System.
- b) Obtains necessary licenses and permits.
- c) Provides site direction to the Engineering Manager and Licensing Manager.
- d) Assures training of assigned personnel.
- e) Manages the Owners responsibility for the design of the Project and ensures its technical adequacy.

17.3.1.2.6.1 Engineering

The Supply System Engineering Manager is accountable to the Manager of Construction Projects and provides Project Support through the Project Technical Manager with responsibilities for the following:

- a) Monitors AE and NSSS Supplier engineering for technical adequacy.
- Approves the use and release of design criteria, technical specifications and other design documents.

- Approves technical content and scope of equipment and construction contracts (including approval of contract closeouts to signify that all technical requirements have been acceptably met) and major design changes. Approves the technical aspects of contract bid evaluations.
- Reviews and concurs with the techical content of licensing documents and assures conformance of engineering activities to SAR or EFSEC commitments and other engineering documents for technical adequacy.
- e) Assures training of assigned personnel.
- f) As a member of the Nonconformance Review Board, approves and/or evaluates NCR dispositions for compliance to established requirements.
- g) Plans and implements WNP-3 ASME Section XI programs.

17.3.1.2.6.2 Licensing

The Supply System Licensing Manager is accountable to the Corporate Regulatory Programs Manager and provides support to the Project through a direct interface with the Project Technical Manager with responsibilities for the following:

- Coordination of preparation and review of licensing submittals among Project, headquarters staff, consultants, the NSSS supplier, and the AE/CM.
- Maintains and controls interface with NRC licensing. This includes review of submittals to the NRC for consistency with prior commitments as well as with Supply System policies and procedures.
- Assures timely licenses are obtained from the NRC in support of plant schedules.
- Monitors the performance of NSSS supplier and the AE/CM licensing activities.
- e) Assures the training of assigned personnel.
- f) Coordinates evaluation of operational experience of other nuclear power plants.

17.3.1.2.6.3 Plant Preservation

Plant Preservation's function is to preserve, operate and maintain the plant and the construction site during the extended delay period. Plant Preservation is comprised of a Manager, an Operations Supervisor and a Maintenance Manager. The operations and maintenance groups are matrixed to the Project from the Manager, Hanford Generating Plant/Packwood Generating Plant.

The Plant Preservation Manager provides support to the project and reports directly to the WNP-3 Site Manager/Deputy WNP-3 Site Manager. The Plant Preservation Manager is responsible for the operation and maintenance of construction and permanent systems and the preservation of plant and construction equipment, materials and facilities. The following are Plant Preservation functions:

- a) Preserve and protect the plant during the extended construction delay. Maintain and operate plant and site support systems.
- Assure adequate training of assigned site personnel engaged in plant operational, maintenance and support activities.
- Develop and maintain approved program and procedures which provide administrative and technical controls for the operation and maintenance of the plant and control of plant records, reports and files.
- d) Provide a continuing review and resolution of plant operating problems and safety related matters to assure safe plant operation.
- e) Operate and maintain plant components efficiently and effectively during provisional acceptance and following final acceptance.

17.3.1.28 Project Support

Project Support is comprised of a Project Support Manager, Support Services Manager, and an Administration Manager and matrixed Business and Security operations.

The Project Support Manager is accountable to the WMP-3 Site Manager/Deputy WMP-3 Site Manager and is responsible for the following:

- a) Providing management and staff support to the WNP-3 Site Manager.
- Providing Administrative, Business, Support Services, and Security support during preservation of WNP-3.
- c) Assures training of assigned personnel.

17.3.1.2 7.1 Support Services

Support Services is responsible to ensure that any responsibilities in the areas of procurement, warehousing, materials and document control are performed in accordance with approved procedures and in full compliance with the Applicable Codes and Standards.

The Support Services Manager reports to the Project Support Manager. He is responsible for Records Management, Finance and Controls, Warehouse/Material Control and Data Processing.

- Records Management is responsible for implementation of the WNP-3 Records Program, and establishing a record retention schedule.
- b) Finance and Controls is accountable to the Corporate Controller and provides support to the Project through the Project Support Manager.
- Warehouse/Material Control is responsible for the material control and warehousing functions and assists the Quality Assurance Manager/
 Designee with all receiving data required to review all documentation and perform physical material inspections and acceptance.

17.3.1.2.0.2 Security

Security is accountable to the Supply System Corporate Security Programs Manager and provides security support to the Project through a direct interface with WNP-3 Support Manager.

17.3.1 2.0.3 Administration

The Administration Manager is accountable to the Project Support Manager and is responsible for Administrative support for the Project organization, providing material management support by preparing/processing purchases requisitions, purchase orders and coordinating revisions and updates of Plant Procedures.

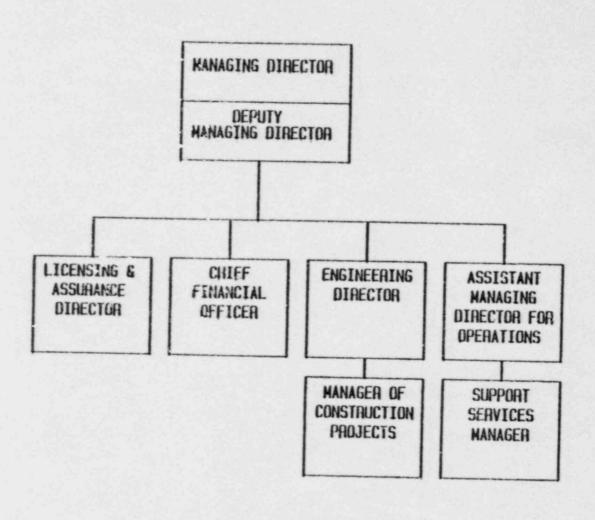
17.3.1.2.D.4 Business

The Business Manager is accountable to the Supply System Manager, Corporate Contracts and Materials Management and supports the Projects through the Project Support Management by providing contract administration support.

17.3.2 QUALITY ASSURANCE PROGRAM

Refer to FSAR Sections 17.1.1.4 through 17.1.4.3.

WASHINGTON PUBLIC POWER SUPPLY SYSTEM CORPORATE ORGANIZATION



EFFECTIVE 09/01/87

MASHINGTON FUBLIC POWER SUPPLY SYSTEM LICENSING & ASSURANCE DIRECTORATE

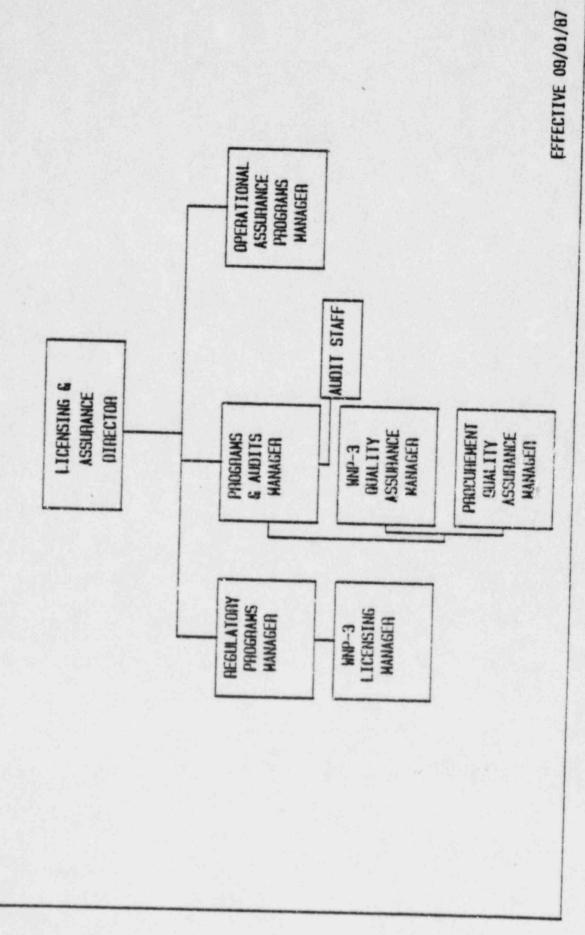
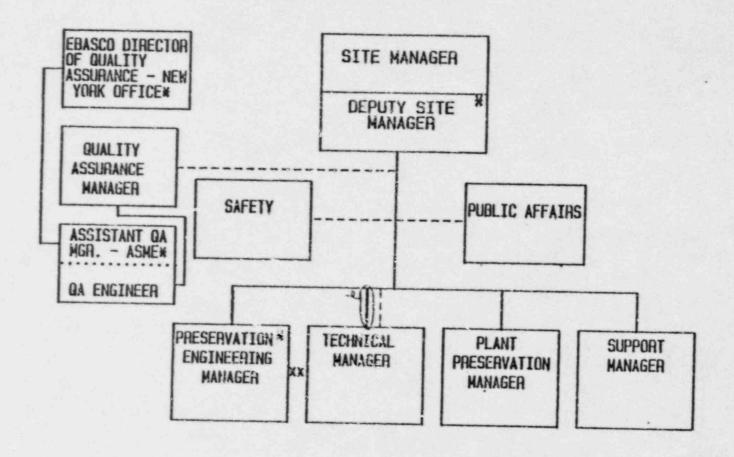


FIGURE 17 3-9

WASHINGTON PUBLIC POWER SUPPLY SYSTEM WNP-3 PROJECT INTEGRATED ORGANIZATION



* " EBASCO SERVICES INC.

XX = TECHNICAL MANAGER OVERVIEWS PRESERVATION ENGINEERING AND AE FUNCTIONS PERFORMED IN NEW YORK.

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