September 3, 1997

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, CHANGES TO OPERATIONAL QUALITY ASSURANCE PROGRAM, WOLF CREEK GENERATING STATION, (TAC NO. M99084)

Dear Mr. Maynard:

The staff is currently reviewing your request for changes (Change 10) to the Operational Quality Assurance Program (OQAP) currenily in place at the Wolf Creek Generating Station. Additional information is required in order for the staff to complete its review of your request. The additional information that is needed is in the enclosure. In order for the staff to maintain their review schedule, your response is requested within 45 days of the date of this letter.

Sincerely,

Original Signed By

James C. Stone, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosure: Request for Additional Information

cc w/encl: See next page

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WOLF CREEK NUCLEAR OPERATING CORPORATION

WOLF CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-482

REQUEST FOR ADDITIONAL INFORMATION

Specific Comments

1. The proposed additional text (regarding the dispositioning of supplier nonconformances) to Item 5 on page 17.2-13 contains the text from the fourth paragraph from Section 17.2.15.3 (Note: Section 17.2.15.3 is being deleted in its entirety). With this deletion and relocated text, it is unclear as to what type of reports will now be used to document nonconforming materials, parts or components under warehouse control and to document minor documentation related nonconformances at the time of receipt and after receipt inspection. Further, what is the document to be used to document and accept nonconformances identified by the supplier of an item before it is shipped to Wolf Creek? If the document is the Performance Improvement Requests (PIRs) or some other nonconformance document, the document and its controls need to be described in the Operational Quality Assurance Program (OQAP). Additional OQAP text appears to be needed to describe the controls for the various types of nonconformances.

   Replacing the proposed deleted Section 17.2.15.3 with the proposed text on page 17.2-13 does not appear to adequately describe the nonconformance controls for items that are identified by the suppliers as nonconforming.

   Further, where has the other deleted text from existing Section 17.2.15.3 been captured in the OQAP text? For example, is the Commodity Discrepancy Report (CDR) used or has it been replaced by the PIR? Are nonconformance reports and CDRs no longer used and have they been replaced by the PIR? The OQAP needs to describe (on a high level as it does now) the nonconformance controls for these activities and not just refer to implementing procedures.

2. Section 7c on page 17.2-13 identifies a disposition of "redesign." Neither the third paragraph of proposed Section 17.2.15.2 nor any other paragraph in this section addresses the "redesign" disposition. Is this an oversight? Also, the disposition of "redesign" is not addressed in existing Section 17.2.12.4 (proposed Section 17.2.12.3). Again, is this an oversight?

3. The proposed fourth paragraph of Section 17.2.15.2 deletes the OQAP description for the review and approval process for conditional releases prior to implementation by the Performance Improvement and Assessment division. Has this review and approval process changed? The basis for this deletion is not clear. Please discuss the controls for review and approval of conditional releases and describe these controls in the OQAP.

4. The last sentence, Prior to implementation, dispositions are independently reviewed by Performance Improvement and Assessment for NCRs and Supplier/Material for CDRs. The existing Section 17.2.15.4 on page 17.2-41 is being deleted. What group is now responsible for performing these activities? Where is this now described in the OQAP? The justification provided for this deletion includes a lot of discussion, however none of the discussion is described in the OQAP. Also, the justification provided does not discuss the controls associated with non-hardware related nonconformances (e.g., a design package was prepared and the independent design verification was not performed or an operator was performing activities for which he had not received training).

5. Existing Section 17.2.15.5, "Procurement Controls," is being deleted. This section describes among other things the control of nonconformances identified by outside organizations and requires that Supplier/Material Quality staff is responsible for auditing and processing of these supplier recommended nonconformance dispositions. Where is this now described in the OQAP and who now performs this activity? Note: in the justification provided by WCNOC, it is stated that "Section 17.2.15.5 (Procurement Controls) has been revised to eliminate redundant wording and clarify the process, and moved to Section 17.2.4.5.5." Section 17.2.15.5 has been deleted in its entirety. Proposed Section 17.2.4.5.5 does not appear to have incorporated any of the discussion from Section 17.2.15.5, but now refers to procedures that are not discussed or described in the OQAP. Please provide the sections of the proposed revision to the OQAP that describe and clarify the process that was described in existing Section 17.2.15.5.

6. Existing Section 17.2.15.7 (Proposed Section 17.2.15.5) Trend Analysis.

   The first paragraph has been deleted. It is unclear as how the Maintenance Rule trending data will capture and trend the data that is presently being trended by Performance and Improvement and Assessment and the Supplier/Material Quality groups. Further, the proposed revision does not appear to have considered the processing and trending of non-hardware related nonconformances.

   As discussed in the statements of consideration for the Maintenance Rule, where failures are likely to cause loss of an intended function, monitoring should be predictive in nature, providing early warning of degradation. Monitoring activities for specific systems structures, and components (SSCs) can be performance oriented, condition oriented

(parameter trending), or both. The results of monitoring are required to be evaluated against the licensee established goals. Goals should be established commensurate with a SSCs safety significance.

Further, where failures are likely to cause loss of an intended function, monitoring under Maintenance Rule should be predictive, giving early warning of degradation. Maintence Rule trend data is normally associated with identifying maintenance preventable failures. Does the Maintenance Rule Trend Data at WCNOC include trending areas, items, and issues (other than predictive warnings of degraded SSCs) such as the following?

a. Design deficiencies
b. Procurement deficiencies
c. Vendor performance
d. Receiving inspection results (documentation and hardware)
e. Personnel training deficiencies (operations, engineering)
f. QA Program implementation trends

Please identify areas that are presently within the scope of WCNOC trend program that would not continue to be trended when using the WCNOC Maintenance Rule trending data and provide discussion and justification for the elimination of any area that will no longer be trended. Also, it is unclear how the Maintenance Rule data will be incorporated into the trending system that is presently being used.

Please provide discussion on why the trending addressed in the proposed revision to Section 17.2.15.5 has a statement that implies that the Maintenance Rule trend data is limited and "provides for trending safety significant SSCs."

The staff's initial thoughts are that Maintenance Rule trending is a subset of the plant's traditional trending program and as such the Maintenance Rule trend data would only provide a limited scope of trend data for the activities and areas presently being trended at WCNOC.

The use of the Maintenance Rule trend data in lieu of traditional trend data, as described in the proposed revision to existing Section 17.2.15.7, appears to be a significant reduction in commitment. Additional discussion is needed in order to understand this proposed change.

7. Section 17.2.16.1 Scope [CORRECTIVE ACTION].

Describe the processing (review, approval, followup, closeout, etc.) of a PIR categorized as a significant condition adverse to quality. The proposed deletion of Section 17.2.16.3 has eliminated several of the essential elements described in the QQAP concerning the process of escalating or categorizing a PIR to a significant condition adverse to quality.

Further, existing OQAP Section 17.2.16.3, "CARs", is being deleted. This section describes how the requirements of Appendix B will be satisfied when a significant condition adverse to quality exists and it describes the processing of such conditions. Again, with its deletion, it is unclear how the PIR process will control this activity. Perhaps it was an oversight, but the details deleted need to be described in the proposed revision to Section 17.2.16.2.

8. Existing Section 17.2.16.5 (new 17.2.16.4) has not been revised. However, the proposed revisions to existing Section 17.2.15.7 (new Section 17.2.15.5) appears to have deleted the provisions contained in existing Section 17.2.16.4 by deleting trending activities by the QA organization and substituting the Maintenance Rule for trending. It is unclear as to what is the purpose of each of these two sections (as used in the proposed change) and how they are related (if at all).

General Comment on Staff Guidance used for Review of Changes to Quality Assurance Program Changes

1. In the Wolf Creek Nuclear Operating Corporation (WCNOC) (justification for the proposed OQAP change), reference is made to Criterion XVI, "Corrective Action," of Appendix B to 10 CFR Part 50. An additional regulatory requirement applicable for the staff's review of the proposed OQAP change is contained in 50.34(b)(6)(ii) which requires that the OQAP (WCNOC's FSAR Chapter 17.2) shall include a discussion of how the applicable requirements of Appendix B to 10 CFR Part 50 will be satisfied.

2. Section 17.2, "Quality Assurance During the Operating Phase," of NUREG-0800 "Standard Review Plan," provides the review guidance for the NRC staff to use during its review of changes to licensee quality assurance programs.