

# WOLF CREEK

NUCLEAR OPERATING CORPORATION

Chief Operating Officer  
Clay C. Warren

September 12, 1997

WO 97-0062

U. S. Nuclear Regulatory Commission  
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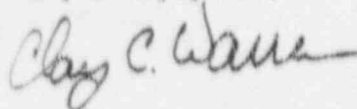
Subject: Docket No.50-482: Deletion of Quality Evaluations In-line  
Review of Administrative Procedures

Gentlemen:

In accordance with the requirements of 10 CFR 50.54(a)(3), Wolf Creek Nuclear Operating Corporation (WCNOC) is submitting a proposed change to the Operational Quality Assurance program for review and approval. Pursuant to 10 CFR 50.54(a)(3), this change has been evaluated by WCNOC and has been determined a reduction in commitments made in the approved Quality Assurance Program.

Attachment I provides an evaluation and discussion of the proposed changes. Attachment II provides a mark-up of the affected Updated Safety Analysis Report pages. In accordance with 10 CFR 50.54(a)(3)(iv), WCNOC plans to implement these changes following receipt of an NRC letter indicating acceptance, or 60 days after the date of the submittal, whichever occurs first. If you have any questions concerning this matter, please contact me at (316) 364-8831, extension 4485, or Mr. Richard Flannigan, at extension 4500.

Very truly yours,



Clay C. Warren

CCW/jad

Attachments

cc: W. D. Johnson (NRC), w/a  
E. W. Merschoff (NRC), w/a  
J. F. Ringwald (NRC), w/a  
J. C. Stone (NRC), w/a

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## **Background**

Wolf Creek Nuclear Operating Corporation (WCNOC) is committed, in the Updated Safety Analysis Report (USAR), to performance of an in-line review of administrative procedures by the Performance Improvement and Assessment organization. WCNOC believes this commitment requires a redundant effort and unnecessary allocation of resources. WCNOC proposes to revise the Operating Quality Assurance Program to eliminate the in-line review of administrative procedures by the Quality Evaluations (QA) group.

The review of procedures which apply to maintenance, modifications, inspections, and special processes will continue to be performed by Quality Control. This review assures that the needed inspections are identified and identifies who is responsible for performing these inspections. In addition, this review identifies the method of inspection and acceptance criteria, as well as providing assurance of inspection documentation.

## **Discussion**

By NRC letter to N. S. Carns, dated April 28, 1994, the NRC issued Amendment No. 73 to Facility Operating License NPF-42. Amendment No. 73 revised Technical Specification 6.5.1, "Plant Safety Review Committee (PSRC)," and Technical Specification 6.8, "Procedures and Programs," in order to allow implementation of the Qualified Reviewer Program for the review and approval of new procedures and procedure changes. Under this process, each new procedure or procedure change is reviewed by a Qualified Reviewer. A Qualified Reviewer is required to meet the applicable qualifications of ANSI/ANS 3.1-1978, "Standard for Selection and Training of Personnel for Nuclear Power Plants," and is certified only after a review of the individual's qualifications by the PSRC and approved by the PSRC Chairman. Cross disciplinary reviews are conducted, as determined by the Qualified Reviewer, prior to approval by the responsible manager. The PSRC continues to review Administrative Control procedures and revisions as well as any procedures or procedure revisions that require a 10 CFR 50.59 evaluation.

Wolf Creek Generating Station complies with Regulatory Guide 1.33, Revision 2, "Quality Assurance Program Requirements (Operations)," as documented in the Updated Safety Analysis Report (USAR). Appendix 3A of the USAR requires that Quality Evaluations include a review of procedures during their evaluation (audit, surveillance or plant evaluation) process.

## **Alternative**

In lieu of performing the Quality Evaluation in-line review of administrative procedures, WCNOC proposes to utilize existing programs (e. g., Qualified Review Program). Quality Control will continue to perform a review of procedures which apply to maintenance, modifications, inspections, and special processes. As part of existing audit activities, a selection of WCNOC procedures that implement the quality program are reviewed to ensure procedures are being maintained.

## Evaluation

Numerous programmatic controls have been established by WCNOG that accomplish the intent of the Quality Evaluations in-line review. These controls ensure that procedures are appropriately reviewed and revised to incorporate information based on plant operations, design changes, vendor recommendations, regulatory requirements, corrective actions, industry experience, and other conditions that may impact plant procedures. The controls are sufficiently comprehensive to ensure required procedure changes are timely and accurate. Performing Quality Evaluation in-line reviews in addition to these controls is redundant and requires plant resources to perform. The following discussion identifies specific WCNOG programmatic controls, already in place, which require an assessment of procedure impact.

### Procedure Requirements and Review

The emphasis of procedure controls is that WCNOG personnel are responsible to ensure procedures used in performance of their assigned activities are technically correct, useable, and include the necessary requirements to accomplish the activity in a safe manner.

- Procedure AP 15C-002, "Procedure Use and Adherence," contains the following instructions which assure all personnel provide input to keep procedures current and relevant:
  - 1) provide feedback to appropriate supervisors on procedure problems and assist as necessary in resolving them.
  - 2) evaluate procedure problems and ensure appropriate corrective measures are taken prior to and during performance of these documents.
  - 3) evaluate procedures to determine if there are better or more efficient ways to performing the activities controlled by these documents and take action to implement these changes.
- Procedure AP 15C-004, "Preparation, Review, and Approval of Documents," requires an individual trained and qualified as a Qualified Reviewer to review the procedure, to ensure technical adequacy, and inclusion of program requirements. AP 15C-004 requires all Qualified Reviewers to meet or exceed the qualification levels described in ANSI/ANS 3.1-1978. The Qualified Reviewer process includes a cross-disciplinary review which may include individuals outside the Responsible Manager's organization. The cross-disciplinary review assists in the assurance of the technical adequacy and usability of the procedure.

Procedure AP 15C-004 requires procedures, which were being implemented at the time of a significant plant event, to be reviewed, following an unusual incident, unexpected transient, significant operator error, or equipment malfunction. This review is performed to determine what impact the procedure had in relation to the cause of the event. Problems are documented through the corrective action program.

The Quality Evaluation program is structured such that a random sampling of some of the plant procedures is audited every two years to determine the effectiveness of all the plant procedures. Procedure effectiveness, as well as procedure usage, is evaluated during the performance of scheduled audits and surveillances. The Quality Evaluation Audits and Surveillances ensure that the procedure review program and the Qualified Reviewer process continues to be effectively implemented.

### Design Change Process

- Procedure AP 05-001, "Change Package Planning and Implementation," requires personnel reviewing the modification change package to identify programs, procedures, and training lesson plans which require revision as a result of the change package and to ensure the necessary changes are incorporated. This ensures the procedures are current with the plant configuration as a result of modifications.

### Corrective Action

- Procedure AP 28A-001, "Performance Improvement Request," provides the methodology for performing corrective action and is used to evaluate and correct non-hardware problems. Through the provisions of this procedure, Performance Improvement Requests (PIRs) are generated to document problems, evaluate the problems, and to implement corrective actions. Performance Improvement Requests are trended and adverse trends are analyzed and reported to management. Effectiveness Followup Reviews are performed for significant PIRs to ensure the corrective actions are effective in preventing recurrence of the problems. The corrective action program necessitates procedure reviews in resolution of many non-hardware problems identified through the Performance Improvement Request process.
- The procedure AP 20E-001, "Industry Technical Information Program" provides for the review and analysis of technical information to ensure industry lessons learned are translated into actions to improve the safety and reliability of Wolf Creek Generating Station. This program requires a Performance Improvement Request to be generated for all incoming Industry Technical Information Program documents.

### Self-Assessment Program

- Procedure AP 28D-001, "Self Assessment Process," provides requirements and guidelines for the performance of self assessments in order to evaluate the effectiveness of organizational processes and/or program performance. The self assessment is an evaluation to determine the effectiveness of a program, process, procedure, or activity. Self assessments are performed with an approved self assessment plan which identifies purpose, scope, methodology, and schedule. Copies of the self assessment plan are provided to management. Performance of the self assessment includes observations, document reviews, and interviews as the main methods of gathering information. Self assessment focus is both performance based and compliance based. The final self assessment report is approved by the appropriate manager and distributed to the appropriate management personnel. The self assessment process involves the review of procedures associated with the area that is being assessed. The Performance Improvement Request is used to document identified problems and to track the resolution to completion.

Quality Evaluations (QE) developed a database to track the number of procedures reviewed and the number of those procedures that had mandatory comments as a result of the QE review. This information was used to provide a performance indicator for the qualified review process, since January 1, 1997. Since this time, there was only one week where the performance indicator identified that greater than 30% of the procedures received by QE had mandatory comments. All other weeks, through August 13, 1997, the performance indicator identified that less than 30% of the procedures reviewed by QE had mandatory comments. In addition to the performance indicator, a review of the mandatory comments made by QE on the procedures reviewed since January 1, 1997, was performed. All but one comment related to the failure of procedures to satisfy WCNOC's

administrative guidelines for procedure revisions. Examples of these types of comments are commitment identification within the procedures, revision bars not utilized as required, appropriate forms not complete for the document revision submittal, forms not completed properly, and sections of the procedure not complete. While these issues are important and expected to be included correctly and properly verified by the qualified reviewer, they do not have a significant technical impact on the acceptability of the procedure. In only one case, the reviewed procedure and other higher tier documents were in conflict with each other. However, this type of situation can be identified by QE during the audit process.

Currently, comments are made by QE during the review process and corrected without the benefit of those ancillary elements that the corrective action program will invoke when identified. The benefit of QE procedure reviews during the audit process is, when issues are identified to be contradictory to the plant requirements, the issues will be identified and corrected within the WCNOG corrective action program. The corrective action process will provide for trending of these conditions and the consistent distribution of expectations, which will be a benefit to the entire WCNOG organization.

#### **Conclusion**

This change does not constitute a reduction with regard to the quality program satisfying 10 CFR 50 Appendix B requirements, but it is considered a reduction to the NRC approved Quality Assurance Program at WCNOG as currently written in the Updated Safety Analysis Report Chapter 17.2. Therefore, NRC approval is required prior to implementation.

Based on the above evaluation, adequate controls are already in place to ensure the timely and accurate review of Wolf Creek Generating Station procedures. Modifying the requirements for the Quality Evaluations in-line review of administrative procedures will not affect the ability of WCNOG to protect the health and safety of the public.

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### 17.2.5.3 Contractor Controls

Procurement documents require outside organizations to have appropriate instructions, procedures, specifications, and drawings to meet the requirements of the Operating Quality Program.

### 17.2.5.4 Operations Documents

The WCGS staff and other responsible departments provide written procedures and drawings as required for the operating phase. These procedures prescribe the Operating Agent's activities which affect the function of safety-related structures, systems, and components.

### 17.2.5.5 Review and Approval

The approval, issue, and control of the various implementing procedures, manuals, and policies are as described in Sections 17.2.2 and 17.2.6. Plant procedures affecting the function of safety-related structures, systems, and components are reviewed by Qualified Reviewers in accordance with the approved WCGS administrative procedures.

Administrative Control Procedures are reviewed and recommended for approval by PSRC. Administrative Control Procedures are forwarded to the Plant Manager for final approval.

Proposed procedure revisions which involve a change in the Technical Specifications or an unreviewed safety question are referred to the Nuclear Safety Review Committee by the PSRC following its review. Temporary changes to procedures are controlled as described in the Technical Specifications.

Table 17.2-2 lists those types of activities under the control of the plant and other Operating Agent procedures. Procedures prepared for the procedures manual and administrative and inspection procedures for the WCGS Procedures Manual are reviewed by Performance procedures are processed through the qualified review process, as dictated in plant improvement and Assessment procedures, ensuring compliance with Operating Quality Program requirements. Additionally, inspection procedures are reviewed by Quality Control personnel for compliance with Operating Quality Program requirements.

## 17.2.6 DOCUMENT CONTROL

### 17.2.6.1 Scope

Documents and their revisions which control activities affecting safety-related structures, systems, and components are prepared, reviewed by knowledgeable individuals, and approved by authorized personnel prior to release or issuing in accordance with written approved procedures.

Departments and organizations responsible for program implementing documents are required to provide and assure the necessary review and approval for instructions, procedures, specification, and drawings. Reviews and approvals assure that issued documents include proper quality and technical requirements, and are correct for intended use. Individuals or groups responsible for preparing, reviewing, and approving documents and revisions thereto are identified in written procedures.

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Control of documents is defined by a method consistent with the importance of the document. Documents are identified and distribution lists identify document holders. Acknowledgment of receipt of selected documents, incorporation of revisions, and control of obsolete documents are required of the document receiver or provided by the distributor. In addition, the distributors of these documents maintain a master list of the documents showing the effective revision date of each.

##### 17.2.6.3 Change Control

Changes to documents are reviewed and approved where practical by the same department, group, or organization that performed the original review and approval; however, the Operating Agent may assume or delegate this responsibility. Organizations which review and approve documents have access to pertinent information and knowledge of the intent of the original document.

##### 17.2.6.4 Distribution Control

Document Services is responsible for the WCNOG distribution system for controlled documents. Document Services is responsible for assuring the distribution and control of the USAR, WCNOG Corporate Policy Manual, General Procedures and all other department and division procedures including the Plant Operating Procedures and Manuals.

##### 17.2.6.5 Processing and Retention Controls

Administrative procedures specify the requirements for the processing and maintenance of records. Procedures also are established to control the distribution of instructions, procedures, and drawings governed by the Operating Quality

Program. WCGS staff and other organizations of the Operating Agent assure that current documents are distributed to and used at the location where the prescribed activity is performed. Clearly identified controlled copies of documents are used to perform an activity.

##### 17.2.6.6 Procedure Review

The review by ~~Performance Improvement and Assessment~~ **Quality Control** of procedures which apply to maintenance, modifications and inspections verify that needed inspections, the responsibility for performing the inspections, and documentation of the inspection results are provided for. The review by ~~Performance Improvement and Assessment~~ **Quality Control** also verifies that written procedures/instructions establish the inspection requirements, methods of inspection and acceptance criteria. Safety-related administrative procedures are reviewed by ~~processed through the qualified review process~~ **ensuring Performance Improvement and Assessment for compliance with Operating Quality Program requirements. Additionally, Quality Evaluations will ensure that procedure effectiveness, the procedure review program and the Qualified Reviewer process is effectively implemented during the performance of evaluation activities (audit, surveillance, plant evaluation) as outlined in the USAR Chapter 3, Appendix 3A, compliance to Regulatory Guide 1.33, Revision 2.**

#### 17.2.7.4 Bidder Exceptions to Purchase Requirements

Exceptions to procurement document requirements requested by bidders are evaluated by the responsible organization(s). Unacceptable conditions identified in bid evaluations are resolved, or if the bidder cannot or will not resolve the unacceptable condition, the bidder is rejected and another bidder selected.

#### 17.2.7.5 Preaward Meetings

Purchasing & Material Services and the originating organization take steps to establish an understanding of the procurement document requirements with the supplier. Meetings or other forms of communication may be held to establish the intent of the Operating Agent in monitoring and evaluating supplier performance. The depth and necessity of these activities is a function of the uniqueness, complexity, frequency of transactions with the same supplier, and past supplier performance. The Operating Agent's hold and witness points are documented at this time if not already specified in procurement documents.

#### 17.2.7.6 Verification Planning

Planning of verification activities to be employed for item or service acceptance begins during the purchase requisition or contract preparation and review stage. The extent of the acceptance methods and associated verification activities will vary and be a function of the relative safety significance and complexity of the purchased item or service and the supplier's past performance. Planning includes a review of the established acceptance criteria and identified documentation. Verification methods which may be employed include certifications (Certificates of Conformance and material certificates or test reports), supplier surveillance, receiving inspection, postreceipt testing and postinstallation tests established by The Operating Agent.

#### 17.2.7.7 Monitoring of Suppliers

Acceptance by supplier surveillance may be considered when the item or service is vital to plant safety; or the quality characteristics are difficult to verify after receipt; or the item or service is complex in design, manufacture, inspection, or test. Surveillance in this sense involves a physical presence to monitor, by observation, designated activities for the purpose of evaluating supplier performance and product acceptance.

Organizations participating in the procurement process have prepared procedures. These documented procedures assure conformance to the procurement document requirements. Procedures also identify organizational responsibilities; provide guidance on the characteristics or processes to be witnessed, inspected or verified, and accepted; the method of surveillance; and the documentation required. These procedures are reviewed and approved by ~~Performance Improvement and Assessment~~ through the qualified reviewer process. These procedures include provisions for the following, as applicable:

1. Identifying supplier planning techniques;
2. Controlling documents generated or processed during activities fulfilling procurement requirements;



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Special processes include such activities as welding, heat treating, nondestructive examination, application of coatings, and chemical cleaning and are accomplished under controlled conditions by qualified personnel in accordance with the technical requirements of applicable codes, standards, specifications, or other special requirements. Procedures detailing special processes are qualified in accordance with applicable codes and standards or, where no appropriate standards exist, to the Operating Agent's requirements. The qualification of processes and personnel is documented and maintained.

##### 17.2.9.2 Procedural Control

Plant procedures prescribe the requirements for the qualification of the Operating Agent's procedures, personnel, and equipment. The involvement of ~~Performance Improvement and Assessment~~ **Quality Control** in the control of special processes includes the review of plant procedures for the adequate inclusion of quality requirements. Quality Control directly performs NDE, or performs surveillances on the work of others who provide NDE services. They also inspect other special process activities conducted by the plant maintenance staff and contractors. Special process equipment that may require periodic adjustment and whose performance cannot be verified through direct monitoring of appropriate parameters is subject to the controls described in Section 17.2.12. Qualification records are maintained current. The Chief Operating Officer is responsible for assuring that personnel performing special processes, excluding NDE, are qualified and are employing qualified procedures. Procedures are also established for recording evidence of acceptable accomplishments of special processes using qualified procedures, equipment, and personnel.

Plant and other responsible Operating Agent organization procedures are also established, as appropriate, to prescribe measures for the preparation, review, and approval of procedures for the control of special processes. Plant procedures address nondestructive examination (NDE) personnel, special process procedures, and inspection personnel qualification requirements. Procedures detailing special processes prepared by the Operating Agent's engineering organizations receive an independent review to assure that quality requirements and acceptance criteria have been incorporated and recorded.

##### 17.2.9.3 Control of Outside Contractors

Qualified outside organizations may be employed to perform special processes and are required to conform to the requirements described herein. Special process procedures submitted by an outside organization(s) in accordance with procurement document requirements receive a technical review by the responsible engineering organization and a quality review by ~~Performance Improvement and Assessment~~ **Quality Control**.

##### 17.2.9.4 Records Control

Qualification records of plant procedures detailing special processes and plant equipment, as appropriate, are maintained by the applicable plant organization. Qualification records of plant personnel performing special processes are maintained under the direction of the Plant Manager.

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17.2.9.5 Qualification of NDE Personnel

Nondestructive examination personnel are qualified in accordance with procedures established per the requirements of the American Society for Nondestructive Testing Standard (ASNT) SNT-TC-1A.

17.2.10 INSPECTION

17.2.10.1 Scope

A program for the inspection of safety-related activities at the WCGS has been established and executed to verify conformance with applicable documented instructions, procedures, drawings, and specifications. Inspections and process monitoring which serve an inspection function are performed by personnel qualified to perform assigned inspection tasks and who are other than the individuals who performed the activity.

17.2.10.2 Procedural Control

The inspection program is conducted in accordance with written approved procedures which specify inspection scope; personnel qualification requirements; inspection method description, including any mandatory holdpoints; acceptance criteria; data collection requirements; and documentation approval requirements. Inspection requirements may be obtained from drawings, instructions, specifications, codes, standards, or regulatory requirements.

Inspecting and the monitoring processes are performed by qualified personnel in accordance with instructions or procedures. Inspection procedures are employed to direct detailed inspection activities. Procedures which specify inspection activities are reviewed by ~~Performance Improvement and Assessment~~ **Quality Control** to verify the inclusion of independent inspection or process monitoring when required and to assure the identification of inspection personnel and the documentation of inspection results. The Operating Agent's inspection procedures are reviewed **through the qualified review process** by ~~Performance Improvement and Assessment~~.

Instructions, procedures, and supporting documents are provided to inspection personnel as applicable for use prior to performing inspection activities. Inspection results are documented. Procedures prescribe the review and approval authority for inspection results.

Inspection procedures, instructions, or checklists provide, as required, for the following:

1. Identifying characteristics and activities to be inspected
2. Describing the method of inspection
3. Identifying the individuals or groups responsible for performing the inspection operation

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##### 17.2.10.5 Acceptance

The acceptance of an item is documented by authorized personnel. Modification, repair, or replacement of items performed subsequent to final inspection requires reinspection or retest, as appropriate, to verify acceptability.

##### 17.2.10.6 Qualification of Inspection Personnel

The Operating Agent's personnel or personnel from outside organizations perform acceptance inspection activities and are qualified within their respective areas of responsibility. The assignment of plant acceptance inspection personnel is under the direction and control of the Manager Performance Improvement and Assessment. The assignment of receipt inspection personnel is under the direction of the Supervisor Supplier/Material Quality. Qualification of the Operating Agent inspection personnel (Exclusive of NDE) is not limited by company position and is defined in levels of capability. The number of levels established for each type of inspector is at least one but no more than three. Inspection assignments are consistent with the certification of an individual. Inspections associated with normal operations of the plant (such as routine maintenance, surveillance, and tests) are performed by individuals other than those who performed or directly supervised the work and may be within the same group, if the following controls are met:

1. The quality of the work is demonstrated through a functional test when the activity involves breaching a pressure retaining item.
2. Inspection procedures, and qualifications of inspection personnel are reviewed and found acceptable by Performance Improvement and Assessment prior to initiating the inspection.

##### 17.2.10.7 Qualification of NDE Personnel

Nondestructive examination functions are accomplished by plant personnel or outside organizations. Personnel involved in the performance, evaluation, or supervision of nondestructive examinations meet the qualification requirements specified ASNT SNT-TC-1A.

The certification of nondestructive testing personnel is to one of three basic levels of qualification.

##### 17.2.10.8 Qualification Program Responsibilities

Plant procedures and procurement documents prescribe the qualification requirements of inspection personnel. The Manager Performance Improvement and Assessment is responsible for assuring that inspection personnel have received appropriate technical and quality training prior to their certification. Performance Improvement and Assessment maintains documented evidence of qualifications of the Operating Agent's personnel performing plant acceptance inspection functions. Performance Improvement and Assessment audits the personnel qualifications and verifies the independence of all personnel performing inspections of safety-related or special scope equipment or services at or in support of the WCGS.

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TABLE 17.2-1

CONTROLLED PROCEDURE MANUALS

<u>Identification</u>	<u>Description</u>	<u>Approval</u>
Wolf Creek Nuclear Operating Corporation(WCNOC) Corporate Policy Manual	A manual consisting of policies, which have applicability to all department personnel.	All sections of this manual are reviewed and commented upon by the Department/Division Heads as assigned by the President and CEO.  Authorization and issuance of this manual and changes thereto is by the WCNOC President and Chief Executive Officer (P/CEO).
WCNOC General Procedures Manual	Administrative controls that are established and imposed when management expects uniform compliance with a process by all organizations, or where management establishes programmatic oversight in assigning responsibilities and defining organizational interfaces.	Impacted division managers for review and comment and Department Heads approve content. Authorization and issuance is by the WCNOC President and Chief Executive Officer. The procedure review process is as described in 17.2.5.

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TABLE 17.2-1 (Sheet 2)

CONTROLLED PROCEDURE MANUALS

<u>Identification</u>	<u>Description</u>	<u>Approval</u>
Wolf Creek Generating Station Procedure Manuals implementing procedures)*	A multi-volume set of procedures prepared by the plant staff. The Station Manuals are controlled, issued and approved in accordance with the applicable procedural controls under the direction of the Plant Manager. These procedures implement the applicable commitments established by the higher tier documents for WCGS operating activities.	All safety-related procedures and procedures implementing code required QA programs and Special Scope programs and all revisions thereto are reviewed by Qualified Reviewers and the Responsible Manager for the affected procedure as described in 17.2.5. Final approval of all procedures and revisions to the procedures are made at the appropriate management level as outlined in the administrative procedures. Approval, issuance, and revision of this Manual is by the Plant Manager.
WCNOC Procedures Manuals (implementing procedures)*	A manual consisting of a set of procedures prepared by various responsible Operating Agent divisions and departments. These procedures are approved by the various division/department heads and serve to implement the requirements specified in upper tier requirements and commitments regarding off-site and on-site activities of the divisions/departments which support the operation of the WCGS.	All safety-related procedures and procedures implementing Code required QA programs and special scope quality programs within this manual and all revisions thereto are prepared by the responsible division/department or function and receive review as described in 17.2.5. Final signature approval of all safety-related procedures and procedures implementing Code required QA programs and special scope quality programs.

\*NOTE: The Operating Agent has begun a conversion process to combine and renumber all implementing procedures. During this time frame, new procedures will follow the approval process of the procedure they void or supersede in accordance with approved procedures.