



IMA performed for a specific or general issue of concern at any time, separate from the required 24-month periodic assessments.

### **1.3 Additional PGE Senior Management Oversight**

The ISFSI Manager and QA Manager report to the Corporate Executive Responsible for Trojan. However, one or more temporary or permanent senior management positions may be appointed between the ISFSI Manager and/or the QA Manager and the Corporate Executive Responsible for Trojan to provide additional management oversight as circumstances demand. In this case, the Corporate Executive Responsible for Trojan retains the responsibility as the highest-level PGE responsible manager for the implementation of this QA Program.

### **1.4 ISFSI Organization**

#### **1.4.1 ISFSI Manager**

The ISFSI Manager reports to the Corporate Executive Responsible for Trojan and is responsible for the day-to-day implementation of the QA Program. Reporting to the ISFSI Manager are the ISFSI Staff line organizations that implement the tasks required to operate the ISFSI in a safe, secure, and efficient manner.

#### **1.4.2 ISFSI Staff**

The ISFSI Staff reports to the ISFSI Manager. Responsibilities, qualifications, and training required for ISFSI staff personnel performing ITS activities are detailed in the Trojan ISFSI FSAR and associated implementing procedures. ISFSI Staff personnel shall not be used to perform audits of ISFSI ITS activities as provided for under this program. Appendix A provides the Trojan ISFSI functional organization chart depicting the groups that comprise the ISFSI staff.

#### **1.4.3 QA Manager**

The QA Manager reports to the Corporate Executive Responsible for Trojan and is responsible for independent oversight of the implementation of the Trojan ISFSI QA Program. The QA Manager also has an indirect reporting responsibility to the ISFSI Manager for ensuring efficient day-to-day implementation of the QA Program by the line organization. If disagreements are identified that cannot be resolved between the QA Manager and the ISFSI Manager, then these are referred to the Corporate Executive Responsible for Trojan for resolution.

Although the QA Manager reports indirectly to the ISFSI Manager in the context of day-to-day ISFSI operations, the QA Manager does not execute line organization work. Rather, the QA Manager acts in an advisory capacity to others in the line organization to ensure compliance with this QA Program. In the oversight role, the QA Manager is responsible for implementing independent QA functions including, but not limited to, quality control (QC) inspections, surveillances, audits, and advising the Corporate Executive Responsible for Trojan on the scope of IMA assessments. In the oversight role, the QA Manager has the authority, direct access to responsible levels of management, organizational freedom, and access to work to perform these



duties, including independence from cost and schedule considerations when opposed to safety function considerations.

*The position of the QA Manager shall meet the following minimum qualification requirements:*

- a. *Graduate of a four-year accredited college or university, a working knowledge gained through training and work experience of regulatory requirements, codes, standards and guidance documents that typically form the basis for a nuclear quality assurance program and its implementation plus five (5) or more years in positions of leadership, such as lead engineer, project engineer, quality engineer, audit team leader, etc.*

*AND*

- b. *At least two years of leadership experience should be associated with nuclear quality assurance activities, and at least one year of this experience shall be in a quality assurance organization. An additional two years of quality assurance program implementation may be substituted for the one-year experience within a quality assurance organization.*

## **1.5 Corporate Executives Responsible for Support Organizations**

Corporate executives with responsibility for nuclear support activities shall assure that their assigned managers implement the QA Program, as applicable. Managers of nuclear support organizations that implement elements of the QA Program, such as records management and procurement services, are responsible for ensuring that procedures that implement the applicable portions of the QA Program are established, implemented, and maintained.

At least biennially, the PGE corporate managers of nuclear support organizations shall review and document the status and adequacy of the parts of the QA Program they are executing and submit it to the ISFSI Manager, QA Manager, and Corporate Executive Responsible for Trojan.

## **1.6 Delegation of Work**

PGE retains and exercises the responsibility for the scope and implementation of this QA Program. Positions identified in this QA Program may delegate all or part of the activities of planning, establishing, and implementing the program for which they are responsible to others, but retain the responsibility for compliance with program requirements. Decisions affecting safety are made at the level appropriate based upon their nature and effect, with technical advice or review as appropriate.

The responsibility for implementing certain elements of the QA Program may be delegated to other organizations duly qualified to perform such activities. However, the ultimate responsibility for compliance with, and effective implementation of the requirements of this QA Program in those areas remains with PGE via the acceptance process for procured items and services.