Nebraska Public Power District
Always there when you need us

50.54(a)

NLS2003100

September 29, 2003

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

Subject: Cooper Nuclear Station Quality Assurance Program Changes
NRC Docket No. 50-298, DPR-46

The purpose of this submittal, in accordance with the requirements of 10 CFR 50.54(a)(3), is for the Nebraska Public Power District to provide notification of the changes to the Quality Assurance (QA) Program that were implemented without prior approval of the Nuclear Regulatory Commission (NRC). The enclosure provides a current List of Effective Pages for the QA Program for Operation Policy Document and copies of pages that have been changed during the report period. None of the changes are considered a reduction in commitment. This report period includes June 22, 2002, to August 15, 2003, inclusive.

Prior to the effective date (November 1, 2002) of the complete QA Program rewrite, submitted to the NRC in letter NLS2002025, the QA program was subject to changes that were not reductions in commitment and have not yet been reported to the NRC pursuant to 10 CFR 54(a)(3). Accordingly, these pages have been provided. The changes added Section 2.1.10, Independent Qualified Reviewer/Independent Qualified Approver, and the position of Senior Manager of Finance, Strategy, and Planning. The Senior Manager of Finance, Strategy, and Planning position has subsequently been rolled into the Senior Level Managers position of section 2.1.5.2. These changes were made effective as part of the rewrite implemented on November 1, 2002.

If you have any questions regarding this submittal, please contact Mr. Paul Fleming at 402-825-2774.

Cloy C. Warren
Vice President - Nuclear and
Chief Nuclear Officer

/nr

Q004

COOPER NUCLEAR STATION
P.O. Box 98 / Brownville, NE 68321-0098
***Telephone:** (402) 825-3811 / **Fax:** (402) 825-5211*
www.nppd.com

Enclosure - List of Effective Pages and Revised Pages for the Nebraska Public Power District Cooper Nuclear Station Quality Assurance Program for Operation Policy Document

cc: Regional Administrator, w/enclosure
USNRC - Region IV

Senior Project Manager, w/enclosure
USNRC - NRR Project Directorate IV-1

Senior Resident Inspector, w/enclosure
USNRC

NPG Distribution, w/o enclosure

Records, w/enclosure

Affidavit

STATE OF NEBRASKA)
)
NEMAHA COUNTY)

Clay C. Warren, being first duly sworn, deposes and says that he is an authorized representative of the Nebraska Public Power District, a public corporation and political subdivision of the State of Nebraska; that he is duly authorized to submit this correspondence on behalf of Nebraska Public Power District; and that the statements contained herein are true to the best of his knowledge and belief.

Clay C. Warren

Clay C. Warren

Subscribed in my presence and sworn to before me this 29th day of September, 2003.

LuAnn Bray

NOTARY PUBLIC

GENERAL NOTARY - State of Nebraska
LUANN BRAY
My Comm. Exp. May 11, 2006

Correspondence Number: NLS2003100

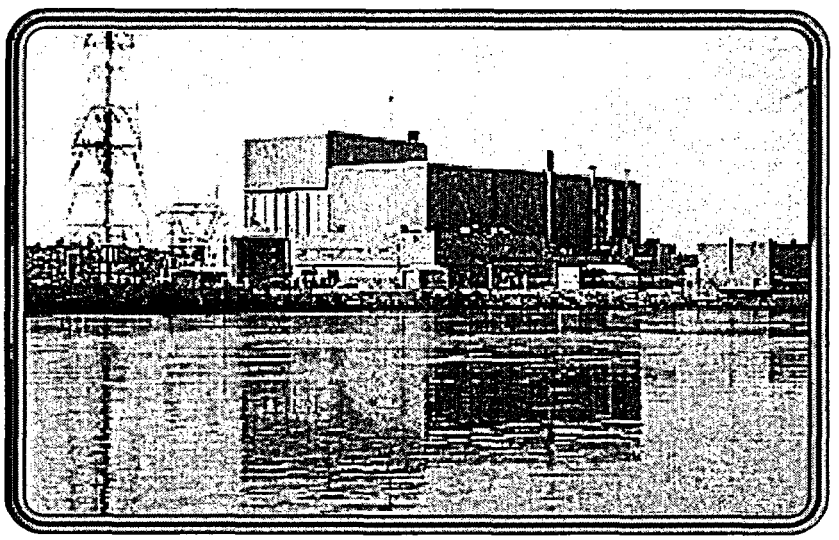
The following table identifies those actions committed to by Nebraska Public Power District (NPPD) in this document. Any other actions discussed in the submittal represent intended or planned actions by NPPD. They are described for information only and are not regulatory commitments. Please notify the Licensing & Regulatory Affairs Manager at Cooper Nuclear Station of any questions regarding this document or any associated regulatory commitments.

COMMITMENT	COMMITTED DATE OR OUTAGE
None	

NEBRASKA PUBLIC POWER DISTRICT

COOPER NUCLEAR STATION

QUALITY ASSURANCE PROGRAM FOR OPERATION POLICY DOCUMENT



Nebraska Public Power District

Nebraska's Energy Leader

CNS QA PROGRAM FOR OPERATION POLICY DOCUMENT
LIST OF EFFECTIVE PAGES

NEBRASKA PUBLIC POWER DISTRICT
COOPER NUCLEAR STATION
QUALITY ASSURANCE PROGRAM FOR OPERATION POLICY DOCUMENT

TABLE OF CONTENTS

CORPORATE POLICY STATEMENT

This document establishes and describes the policies and practices of the Quality Assurance Program applicable to the operation of the Cooper Nuclear Station and the support activities of all Nebraska Public Power District (NPPD) Nuclear Divisions. NPPD's policy with respect to nuclear safety and quality assurance is detailed in this document.

Each Nuclear Division is responsible for the development of policies and procedures which implement this Quality Assurance Program. Other divisions and departments at NPPD may also have responsibilities under this program and shall comply as described in appropriate implementing procedures.

The Safety Review and Audit Board, Station Operations Review Committee, and the Quality Assurance Division shall monitor NPPD's nuclear program and provide management with evaluations and assessments regarding the effectiveness of implementation of the program. When evaluations and assessments identify a concern, management shall take expeditious action to correct any undesirable condition(s) including, when appropriate, action to preclude repetition of such condition(s).

NPPD personnel shall have the organizational freedom to identify concerns and propose corrective and preventive action necessary to enhance NPPD's nuclear program.

The assurance of safe and reliable operation of Cooper Nuclear Station is everyone's duty. Quality shall be everyone's responsibility.

APPROVED:

7/15/03
President & CEO

Vice President - Nuclear

K A Dahlberg
General Manager of Nuclear Performance Analysis

1.3.16 Lower Tier Procurement

Procurement by a supplier from a sub-supplier of items or services.

1.3.17 Maintenance Procedures

Written instructions which define a preplanned maintenance program and prescribe the methods, materials, and processes to be used to assure continuing quality and continuing operation of equipment within required performance characteristics.

1.3.18 Management

The Cooper Nuclear Station management comprised of the Vice President - Nuclear (VP - Nuclear), Vice President Plant Support (VP Plant Support), the Site Vice President (Site VP), all Senior Level Managers, the General Manager of Nuclear Performance Analysis, and all other Managers and Supervisors at Cooper Nuclear Station.

1.3.19 Maintenance, Repair, or Modification

Those maintenance, repair, or modification activities performed on nuclear safety-related structures, systems, or components which involve:

(a) Special craft or procedure qualifications to meet Code, Standard, or Regulatory requirements;

(b) Alterations which affect overall structural integrity, essential performance characteristics, or margins of safety in design for nuclear safety-related structures, systems, or components;

(c) Any permanent change to the facility that requires a Technical Specification change or NRC approval pursuant to 10CFR50.59(c)(2).

1.3.20 Minor Maintenance, Repair, or Modification

Those maintenance or repair activities which are within a journeyman craftsman's capability, and which:

(a) Are prescribed in the equipment manufacturer's instruction books as necessary or desirable for most effective operation;

(b) Are prescribed as part of a preplanned and approved routine or preventative maintenance program;

(c) Any permanent change to the facility judged significant enough to warrant documentation that does not require a change in Technical Specification or require NRC approval pursuant to 10CFR50.59(c)(2).

(c) Appropriate documentation is maintained to show compliance with (a) and (b) above.

1.3.28 Quality Assurance Management

The Quality Assurance Division Management at CNS comprised of the VP - Nuclear, the General Manager of Nuclear Performance Analysis, the QA Managers and all supervisors within the QA Division.

1.3.29 Quality Assurance Plans (QAPs)

QAPs provide guidance for QA oversight through the audit function by describing specific requirements associated with the scope and frequency of audits. QAPs define the specific work which is to be subjected to QA review, surveillance, and audit, and the manner in which such review, surveillance, and audit is to be implemented.

1.3.30 QA Program Procedures

Those documents inclusive of the QA Program Policy Document, QA Program Procedure, NQPs, QAPs, and station procedures (and associated data sheets), logs, etc., prepared and approved in accordance with the applicable regulatory requirements, including 10CFR50 Appendix B. These documents provide detailed requirements for a given functional area through application of the 18 criteria of 10CFR50 Appendix B except for QAPs which apply only to the audit function requirements and scope.

1.3.31 Quality Assurance Records

Those records which have been completed and furnish documentary evidence of the quality of items and/or activities affecting quality. (Refer to ANSI N45.2.9 - 1974, Appendix A) Control provisions shall be established for in-process records at the point at which they attest to completion of quality related activities.

1.3.32 Quality Commercial Grade

Procurement classification of a Commercial Grade Item (CGI) which meets the 10CFR21 definition of CGI and is intended for safety-related use, is procured from a QA approved source and is dedicated in accordance with approved station procedures.

1.3.33 Quality Control

Those activities which deal directly with the measurement, observation, or verification of physical characteristics of materials, components, or systems which provide a basis for controlling quality to within predetermined limits, or requirements, including adequate quantitative and/or qualitative acceptance criteria.

2.1.2 Vice President - Nuclear (VP - Nuclear)

The VP - Nuclear, reporting to the President/CEO, is the responsible executive officer for all CNS QA related activities. Responsibility includes the implementation of QA activities governing those SSCs that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public. The VP - Nuclear reserves the authority to conduct, or order the auditing or monitoring of any operations activity, at any time, to ascertain the effectiveness of the overall QA Program and to determine compliance with all aspects of the QA Program.

2.1.3 Site Vice President (Site VP)

The Site VP and his staff, reporting to the VP - Nuclear, shall be responsible and have the authority for assuring compliance with QA activities as defined by the QA Program and other approved QA Program documents. Some of these responsibilities are delegated to CNS management personnel and include QC and Inspection functions as defined in Table 2. The actual functions to be performed shall be defined in lower tier documents such as NQPs, QAPs, station procedures, etc. Directly reporting to the Site VP are Senior Level Managers including the Plant Manager.

2.1.3a Vice President - Plant Support (VP Plant Support)

The VP Plant Support and his staff, reporting to the VP - Nuclear, shall be responsible and have the authority for assuring compliance with QA activities as defined by the QA Program and other approved QA Program documents. Some of these responsibilities are delegated to CNS management personnel and include QC and inspection functions as defined in Table 2. The actual functions to be performed shall be defined in lower tier documents such as NQPs, QAPs, station procedures, etc. Directly reporting to the VP Plant Support are Senior Level Managers.

2.1.4 QA Division

The QA Division, reporting to the VP - Nuclear, shall have complete organizational and functional independence to perform all QA oversight functions.

The QA Division shall periodically, randomly, and situationally review and comment on the CNS Operations Manual procedures to assure that necessary quality requirements are included. Differences of opinion on QA comments shall be resolved as indicated in Section 2.1.4.2 of this QA Program.

Written reports of all QA activities shall be appropriately included in the station records storage facility. Corrective action on deficiencies shall include resolution of the specific deficiency and verification that corrective action has been implemented to prevent occurrence of similar deficiencies in the future. A report of QA activities shall annually be submitted by the General Manager of Nuclear Performance Analysis to the VP - Nuclear.

2.1.4.1 General Manager of Nuclear Performance Analysis

The General Manager of Nuclear Performance Analysis (General Manager of NPA), reporting to the VP-Nuclear, shall have the responsibility and authority for administrating and maintaining the QA Program in accordance with 10CFR50, Appendix B. Inherent in this responsibility is the authority to accept or reject any or all work, materials, or equipment associated with CNS. The General Manager of NPA shall direct the preparation of plans and procedures for defining the QA functions associated with CNS to ensure that such functions are conducted in accordance with the CNS Operating License, including the Technical Specifications. The General Manager of NPA shall also approve all plans and procedures for defining and auditing the safety-related activities at CNS and NPPD's General Office. The actual audit functions to be performed are defined more completely by the body of NQPs and QAPs described in Section 4.0 of this Policy Document. The General Manager of NPA shall also have administrative responsibility for the ongoing development and implementation of the supplier evaluation program, which includes the appropriate reviews of procurement documents and audit/surveillance evaluations of suppliers of nuclear safety-related equipment, materials, spare parts and services.

The General Manager of NPA and QA staff shall have the requisite organizational freedom and access within the NPPD organizations that support and operate CNS, in order to institute the necessary QA requirements, identify problems, and pursue timely corrective action.

The General Manager of NPA is responsible for oversight of CNS QA activities to the extent necessary for assuring compliance with the QA Program. The effectiveness of the QA Program shall be reviewed periodically with the VP - Nuclear. The General Manager of NPA is also afforded a direct line of communication with the President/CEO. The General Manager of NPA shall serve as a member of the SRAB and provide additional QA personnel to participate in SRAB activities when requested.

As described in Table 2, the General Manager of NPA shall have responsibility for accomplishment of third level QA audits and surveillances and shall seek assistance or expertise when necessary to effectively complete such audits.

The QA Manager shall function as the General Manager of NPA during his absence, unless provided otherwise in writing.

2.1.4.2 Quality Assurance Management

QA Management, under the direction of the General Manager of NPA, shall have the responsibility and authority for implementing and maintaining the QA Program, as described herein. They shall routinely monitor open QA issues.

They shall have the responsibility and authority to perform, direct, implement, or coordinate Audit and Surveillance Functions for activities and programs within NPPD's nuclear power organizations. QA review of the nuclear design and engineering functions, including configuration management, shall be included in such programs. These activities

and programs shall determine if conformance with the CNS QA Program, and applicable federal regulations defined therein, are being maintained.

QA Management shall advise and assist Senior Level Management and their staff in all matters which affect QA and Quality Control (QC) at CNS.

QA Management shall ensure that training programs are provided for QA Division personnel to enable them to effectively execute and monitor the QA Program.

A member of QA Management, or designee, shall serve as a non-voting member of the Station Operations Review Committee (SORC).

QA Management and staff will observe operations, maintenance, in-service inspection, special processes, repair, or modifications, and other safety-related activities covered by the QA Program, and recommend that work stop when such activities, in their opinion, do not comply with approved controlling documents. The appropriate VP, or designee, is responsible to act on that recommendation and actually stop work unless it is determined such stoppage would result in a violation of Technical Specifications or other approved documents governing station operation, or in cases of overriding considerations regarding personnel or nuclear safety.

QA Management will provide for a coordination function for QC activities at CNS. This includes development and maintenance of program procedures, reviews of inspector certifications and performance, review and acceptance of control methods, and the establishment of a training program. The function will also provide the communication path for the resolution of QC Inspector concerns.

QA Management has authority for establishing, implementing and maintaining the program for evaluating suppliers for safety-related equipment, materials, spare parts, and services, and for auditing the QA/QC activities of such suppliers.

QA Management shall have the responsibility and authority for the control, administration, distribution, maintenance, and coordination of revisions to the QA Program, including implementing documents.

(a) Resolution of Disagreements

Disagreements or differences of opinion on QA matters are expected to be documented and jointly resolved by QA and line personnel. Where such resolution is not achieved within a reasonable period of time, unresolved differences shall be promptly reported to the appropriate level of QA Management for joint resolution with line management, including the General Manager of NPA and Senior Level Management personnel, as appropriate.

2.1.4.3 QA Division Staff

QA personnel, as well as personnel from other divisions who may be requested to assist in performing QA activities under the direction of the General Manager of NPA, shall have sufficient authority and organizational freedom to:

(a) Identify quality problems;

(b) Initiate and recommend solutions for conditions adverse to quality;

(c) Verify implementation of solutions.

The QA Division, under the direction of the General Manager of NPA, shall have the responsibility and authority for implementation and ongoing development of the QA Program. It shall also be the responsibility of the QA Division to monitor the interface between the various NPPD and CNS Divisions in order to evaluate the effectiveness of management in implementing inter-divisional activities affecting quality.

2.1.5 Management

CNS Management is responsible for assessment of the effectiveness of implementation of program elements within their assigned areas, and for timely and effective resolution of conditions adverse to quality. Management shall assure that activities under their control are conducted in accordance with the CNS QA Program. This includes, but is not limited to, timely response to QA Division Audit and Surveillance findings and implementation of appropriate corrective or preventive actions. For those aspects of fuel management covered by the QA Program, Management responsible for the fuel and reactor engineering function shall be responsible to furnish technical assistance as required to the Plant Manager and the QA Division Staff. Such assistance shall not replace or supersede formal audits. NPPD Management shall be responsible to maintain focus on nuclear safety.

2.1.5.1 Plant Manager

The Plant Manager, who reports to the Site VP, is assigned responsibility for plant operations, maintenance, radiological, and chemistry department functions.

2.1.5.2 Senior Level Managers

Senior Level Managers provide management oversight through assignment to various functions and key areas of support to plant operations. Senior Level Managers report to either the Site VP or the VP Plant Support. Functions assigned to Senior Level Managers include engineering (and plant modification activities), fuels and reactor engineering, risk management, security, emergency preparedness, training, work control, outage, materials management, information services, and administrative support. Senior Level Managers shall regularly review the areas for which they are responsible, keeping abreast of significant quality activities.

Business services, corrective action program, and Licensing and Regulatory Affairs functions are assigned to Senior Level Management oversight reporting directly to the VP - Nuclear.

3.2.13 Senior Manager of Finance, Strategy, and Planning

The Senior Manager of Finance, Strategy, and Planning reports directly to the Vice President - Nuclear and has responsibility for materials management and business services functions.

3.3 Cooper Nuclear Station Personnel

The operational duties and responsibilities of the Cooper Nuclear Station personnel are described in the CNS Procedures Manual, Reference 7.5. In addition, the Cooper Nuclear Station personnel are assigned Quality Control inspection functions. Station personnel, under the direction of the Site Vice President and his staff, are responsible for assuring that the station is tested, operated, maintained, and modified in accordance with approved plans and procedures.

3.4 Safety Review and Audit Board

The Safety Review and Audit Board (SRAB) has been established to provide independent review and audit of designated activities.

1. Membership:
    a. Chairman
    b. Vice-Chairman
    c. Five Members
    d. Consultants (as required)

The Board members shall collectively have the capability required to review problems in the following areas: nuclear power plant operations, nuclear engineering, chemistry and radiochemistry, metallurgy, instrumentation and control, radiological safety, mechanical and electrical engineering, quality assurance practices, and other appropriate fields associated with

2.1.5.3 Supply Chain Manager

The NPPD Supply Chain Manager, reporting to the Vice President - Corporate Support Services (who reports to the President and CEO), has responsibility and authority for administrating and maintaining procurement functions and activities.

2.1.6 CNS Personnel

The operational duties and responsibilities of CNS personnel, under the direction of either the Site VP or the VP Plant Support, are described in the CNS Operations Manual. Sufficient numbers of licensed and senior licensed operating personnel will be available to assure proper operation of the station. Station personnel are responsible for assuring that the station is tested, operated, maintained, and modified in accordance with approved plans and procedures. In addition, station personnel are assigned QC inspection functions.

Occasionally, assistance in performing QA Division functions will be required from trained technical, engineering, or other station personnel who are not members of the QA Division. During the time personnel are performing QA Division functions, they shall be responsible to the QA Division to maintain the organizational independence required by the QA Program.

2.1.7 Safety Review and Audit Board (SRAB)

The SRAB has been established to provide independent review and audit of designated activities. The responsibility and authority over the SRAB has been delegated to the VP - Nuclear.

2.1.7.1 SRAB Membership

Membership is seven (7), to include:

(a) Chairman

(b) Vice-Chairman

(c) Five Members

(d) Consultants (as required)

The Board members shall have the collective capability required to review problems in the following areas:

(a) nuclear power plant operations,

(b) nuclear engineering,

(c) chemistry and radiochemistry,

(d) metallurgy,

(e) instrumentation and control,

(f) radiological safety,

(g) mechanical and electrical engineering,

(h) quality assurance practices,

(i) and other appropriate fields associated with the unique characteristics of the nuclear power plant involved.

When the nature of a particular problem dictates, special consultants will be utilized.

Alternate members shall be appointed in writing by the Chairman to serve on a temporary basis. No more than two alternates shall serve on the Board at any one time.

Meeting frequency is semiannual, and as required on call of the Chairman.

Quorum is five (5), including Chairman or Vice Chairman, plus four members, including alternates. No more than a minority of the quorum shall be from groups holding line responsibility for the operation of the plant.

The General Manager of NPA shall serve as a member of the SRAB.

2.1.7.2 SRAB Responsibilities

The following subjects shall be reported to, and reviewed by, the SRAB.

(a) The evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provisions of 10CFR50.59, to verify that such actions did not require NRC approval pursuant to 10CFR50.59(c)(2).

(b) Proposed changes to procedures, equipment or systems which require NRC approval pursuant to 10CFR50.59(c)(2).

(c) Proposed tests or experiments which require NRC approval pursuant to 10CFR50.59(c)(2).

(d) The evaluations performed in accordance with GL 86-10 for changes to the fire protection program and implementing procedures to verify that such actions did not require NRC approval.

(e) Proposed changes to Technical Specifications or the CNS Operating License.

(f) Violations of applicable codes, regulations, orders, Technical Specifications, license requirements, or internal procedures or instructions having nuclear safety significance.

(g) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that could affect nuclear safety.

(h) All reportable events specified in 10CFR50.73.

(i) Any indication of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.

(j) Minutes of meetings of the SORC.

(k) Disagreement between the recommendations of the SORC and the SORC Chairman.

(l) Review of events covered under e, f, g, and h above shall include reporting the results of investigations to appropriate members of management and recommendations to prevent or reduce the probability of recurrence.

The SRAB shall attempt to detect trends that may not be apparent to a day-to-day observer.

The SRAB shall report and be advisory to the VP - Nuclear on the subjects of review specified previously, audit results, and on audit responsibilities specified in Section 2.18 of this Policy Document.

Minutes shall be recorded for all meetings of the SRAB and shall identify all documentary material reviewed. Copies of the minutes shall be forwarded within one month of the meeting to the VP - Nuclear, Site VP, the Plant Manager, and such others as the Chairman may designate.

2.1.8 Station Operations Review Committee (SORC)

The SORC has been established to advise the Plant Manager in all matters regarding operational safety.

2.1.8.1 SORC Membership

The SORC shall have a minimum of eight (8) voting members, to include:

Chairman: Plant Manager or alternate

Seven (7) members from the following disciplines:

(a) Operations

(b) Radiological (Chemistry/Health Physics)

(c) Maintenance

(d) Engineering

(e) Reactor Engineering

(f) Instrumentation and Control

The members, according to individual job title, shall meet the requirements as described in Sections 4.2, 4.3.1, or 4.4 of ANSI N-18.1 1971, "Selection and Training of Nuclear Power Plant Personnel," or Regulatory Guide 1.8, revision 2, "Qualification and Training

of Personnel for Nuclear Power Plants", as stipulated in Section 2.2 of this Policy Document.

Non-voting members may also serve on SORC to broaden its expertise in other areas (e.g., Licensing.)

Alternate members shall be appointed in writing by the SORC Chairman to serve on a temporary basis. No more than two (2) alternates shall participate as voting members in SORC at any one time.

Meeting frequency is monthly, and as required on call of the Chairman.

Quorum is the SORC Chairman plus four (4) voting members.

2.1.8.2 SORC Responsibilities

SORC review responsibilities include:

(a) Review of 10CFR50.59 Evaluations associated with procedures and programs required by Technical Specification 5.4.1, and changes thereto.

(b) Review of proposed changes in procedures, SSCs or facilities, or tests or experiments involving a change in the Technical Specifications or any other changes to the Technical Specifications or Operating License.

(c) Review of proposed tests and experiments and their results, where:

- a written evaluation pursuant to 10CFR50.59(d)(1) is performed, or
- where nuclear safety could be adversely affected.

The SORC shall submit tests or experiments which may require NRC approval pursuant to 10CFR50.59(c)(2) to the SRAB for review.

(d) Review of proposed changes or modifications to SSCs or facilities:

- as discussed in the USAR, or
- where a written evaluation pursuant to 10CFR50.59(d)(1) is performed, or
- where nuclear safety could be adversely affected, or
- which require NRC approval pursuant to 10CFR50.59(c)(2).

The SORC shall submit changes to equipment, systems, or facilities having safety significance to the SRAB for review.

(e) Review of station operation to detect potential nuclear safety hazards.

(f) Investigation of violations of Technical Specifications. This includes reporting evaluations and recommendations to prevent recurrence to the VP - Nuclear and the Chairman of the SRAB.

(g) Performance of special reviews and investigations and rendering reports thereon as requested by the Chairman of the SRAB.

(h) Review of reportable events specified in 10CFR50.73 and submission of the results of this review to the VP - Nuclear and the Chairman of the SRAB.

(i) Review of drills on emergency procedures (including plant evacuation) and adequacy of communication with off site groups.

(j) Review of proposed changes to the Offsite Dose Assessment Manual.

(k) Review of proposed changes to the Process Control Program.

(l) Review additions, deletions, or modifications to the Emergency Plan.

SORC may also review procedures and programs, and changes thereto, in lieu of the Independent Qualified Reviewer and Independent Qualified Approver, as specified in Section 2.1.10.

The SORC shall be advisory to the Plant Manager.

The SORC shall recommend to the SORC Chairman approval or disapproval of proposals under the review responsibilities. In case of disagreement between the recommendations of the SORC and the Chairman, the course determined by the Chairman to be more conservative will be followed. A written summary of the disagreement will be sent to the VP - Nuclear, Site VP, and the Chairman of the SRAB.

The SORC shall report to the Chairman of the SRAB on all reviews and investigations listed under review responsibilities.

The SORC shall make determinations regarding whether or not proposals considered by the Committee require NRC approval pursuant to 10CFR50.59(c)(2). This determination shall be subject to review by the SRAB.

Minutes for all meetings of the SORC shall be recorded and shall include identification of all documentary material reviewed. Copies of the minutes shall be forwarded to the VP - Nuclear and the Chairman of the SRAB within one month of the meeting.

Written procedures for Committee operation shall be prepared and maintained describing the method of submission and content of presentations to the committee, provisions for use of subcommittees, review and approval by members of written Committee evaluations and recommendations, dissemination of minutes, and such other matters as may be appropriate.

2.1.9 Outside Contractors

It may occasionally be necessary to obtain assistance from outside suppliers, contractors, subcontractors and consultants (hereafter referred to as "contractors"). At all times these contractors will work under the direction of the NPPD organization having primary responsibility for the particular work being performed. In those instances in which personnel are merely furnished to augment the normal CNS staff for particular activities, such contractors shall be required to perform their work in accordance with the CNS QA Program and other appropriate station procedures and instructions. In those instances in which contractors are assigned primary responsibility for a particular activity, such contractors shall be required to maintain a QA and QC Program and organization appropriate to the work to be performed.

All contractors performing work classified as essential shall be maintained on the appropriate section of the CNS Approved Suppliers List. Selection of contractors shall require the active participation of the QA Division for evaluation and approval of the contractor's QA Program.

In every instance in which contractors have responsibility for work at CNS on safety-related nuclear systems, such contractors shall be contractually required to work to procedures approved by CNS Independent Qualified Reviewers/Independent Qualified Approvers and/or SORC, as specified in Section 2.1.10 of this Policy Document. Recognized standards or existing proprietary procedures may be used, however, they must be specifically invoked in writing and clearly identified as to their applicability to the CNS work. Any contractor performing work at CNS under its own QA program shall be contractually required to prepare, prior to performing the work, a Project QA Plan specific to the work to be performed at CNS.

Prior to performing work at CNS which affects safety-related equipment, contractors and appropriate representatives from NPPD shall jointly develop and enforce written agreements and/or procedures which clearly define the limits of the work, interface between contractor and station personnel, status and custody tagging procedures, contractor personnel dosimetry, and any other aspects which bear on station or personnel security and safety. Such agreements shall be reviewed by the QA Division to ensure compliance with applicable QA Program requirements.

Contractors performing safety-related work under the CNS QA Program shall be contractually required to perform the work under NPPD supervision and in accordance with the CNS QA Program. NPPD personnel responsible for such work shall assure that contractor personnel are qualified to do the work and have been provided formal instruction in QA. Any calibrated tools and equipment provided by the contractor shall be recalibrated at CNS or by an NPPD-approved source prior to use.

If any portion of work on safety-related nuclear systems is to be subcontracted, the prime contractor shall impose the appropriate QA requirements on the subcontractor. CNS QA Division personnel shall have direct access, to and communication with, the contractor's personnel at all levels, both at their home office and in the field.

At all times, when contractors are obtained to assist in the execution of this QA Program, the responsibility for effectiveness of these support organization's activities will remain with NPPD.

2.1.10 Independent Qualified Reviewer/Independent Qualified Approver

2.1.10.1 Procedures and programs required by Technical Specifications 5.4.1 and changes thereto utilize an Independent Qualified Reviewer and Independent Qualified Approver process which shall be controlled and implemented by administrative procedure(s).

2.1.10.2 Each program and procedure required by Technical Specifications 5.4.1 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two technical reviewers; i.e., an Independent Qualified Reviewer and Independent Qualified Approver who are knowledgeable in the affected functional area. The Independent Qualified Reviewer and Independent Qualified Approver shall determine the need for cross-discipline reviews. All required cross-discipline reviews of new procedures, procedure revisions, or changes thereto shall be completed prior to approval. Independent Qualified Reviewers and Independent Qualified Approvers shall not be the individual who prepared the program or procedure, or change thereto.

2.1.10.3 Proposed normal, abnormal, maintenance, and emergency operating procedures specified below, and changes thereto, and any other proposed procedures or changes thereto determined to affect nuclear safety, shall be reviewed by an Independent Qualified Reviewer and approved by an Independent Qualified Approver.

1) The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978;

2) The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;

3) The procedures that implement the quality assurance program for radioactive effluent and radiological environmental monitoring;

4) Implementing procedures of the Safety Plan and Emergency Plan;

5) Administrative procedures for shift overtime; and

6) The procedures that implement all programs specified in Technical Specification 5.5.

2.1.10.4 Each program and procedure required by Technical Specifications 5.4.1 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a certified preparer and reviewer to determine if a 10CFR50.59 or Generic Letter 86-10 Evaluation is required. Evaluations performed pursuant to 10CFR50.59(c) or Generic Letter 86-10, when required, shall be reviewed by the SORC per Section 2.1.8 of this Policy Document.

2.1.10.5 Nuclear safety related procedures and procedure changes shall be reviewed and approved, prior to implementation, by Independent Qualified Approvers.

2.1.10.6 Temporary changes to procedures that have been approved by two members of the operating staff holding SRO licenses (one of whom is a supervisor in charge of the shift), in accordance with Section 2.5 of this Policy Document, shall be reviewed by an Independent Qualified Reviewer and Independent Qualified Approver. The Independent Qualified Approver shall verify that the intent of the previously approved program or procedure was not changed.

2.1.10.7 The SORC may be utilized, in lieu of the Independent Qualified Reviewer and Independent Qualified Approver, to fulfill the functions described in Sections 2.1.10.1 through 2.1.10.6 above.

2.1.10.8 All changes to the Process Control Program (PCP) and Offsite Dose Assessment Manual (ODAM) shall be reviewed and accepted by the SORC and approved by the Plant Manager prior to implementation.

2.1.10.9 Independent Qualified Reviewers shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971, with the exclusion of the positions identified in Section 4.3.2 and 4.5. Individuals whose positions are described in Section 4.3.2 and 4.5 may qualify as Independent Qualified Reviewers provided they meet the qualification described in other portions of Section 4 of the ANSI standard.

2.1.10.10 The following administrative controls shall be established to govern the process:

1) The Plant Manager shall appoint Independent Qualified Approvers to approve procedures and programs, and changes thereto.

2) The Independent Qualified Approver should be knowledgeable in the technical and functional area of the procedure change.

3) The Independent Qualified Approver should not be the preparer of the procedure change.

4) The Plant Manager should be kept fully informed regarding the safety implications of the procedure changes to be authorized prior to their implementation, to assure that plant safety is not compromised.

5) Independent Qualified Approvers shall meet or exceed the qualifications equivalent to the Plant Manager, as specified in ANSI/ANS-3.1-1978, Section 4.2.1, as demonstrated by appropriate certification.

2.1.10.11 The Plant Manager's delegation of approval authority to Independent Qualified Approvers shall be implemented through administrative procedure.

1) The procedure shall, at a minimum, address the criteria in Step 2.1.10.10 of this Policy Document.

2) The procedure shall be approved by the Plant Manager and VP-Nuclear.

2.2 10CFR50, Appendix B, Criterion II: Quality Assurance Program

The QA Program applies to all activities which affect nuclear safety. This Policy Document identifies the industry Standards and Regulatory Guidance documents which are applicable to the implementation of the QA Program for CNS. Specific exceptions to criteria contained within the referenced Standards are herein described in following sections, as applicable. Specific implementing criteria for the QA Program are contained in lower level implementing procedures.

Specific to the related ANSI Standards for this criterion, the following commitments apply:

1. ANSI N18.1-1971 "Selection and Training of Nuclear Power Plant Personnel," shall provide direction for selecting and training of personnel, with the following clarification:

   (a) Regarding the qualifications of the specific positions of shift manager, senior operator, licensed operator, shift technical advisor, and radiation protection manager, CNS shall comply with the provisions of Regulatory Guide 1.8, Revision 2, "Qualification and Training of Personnel for Nuclear Power Plants."

2. ANSI N18.7-1972 "American National Standard for Administrative Controls for Nuclear Power Plants," and the associated Regulatory Guide 1.33 (November 1972) apply to the CNS QA Program with the same exceptions as those taken in other sections of this Policy Document to ANSI N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants." Specific to the performance of audits, Section 4.5 of ANSI N18.7-1976 applies (see Section 2.18 of this QA Program). Audit frequencies shall be in accordance with Regulatory Guide 1.33, Revision 2. Additionally, to meet the standard of performing audits of all safety-related functions within a period of two (2) years, the QA Division will perform an audit, surveillance, or field observation.

3. ANSI N45.2-1977 "Quality Assurance Program Requirements for Nuclear Facilities," and associated Regulatory Guides 1.28 (June 1972) and 1.33 (November 1972), shall apply to the CNS QA Program, with the following exception:

   (a) Where Section 11, "Inspection," identifies the reporting relationship between the inspector and the "immediate supervisors who are responsible for the work being inspected," the CNS QC Program only requires that the individual performing the verification function shall not perform or directly supervise the work being inspected.

The program shall provide for indoctrination and training of personnel performing activities affecting quality as necessary to assure that suitable proficiency is achieved and maintained.

All NPPD personnel, as well as non-NPPD personnel, who work independently under this QA Program, shall receive formal instruction in Quality Assurance, including:

(a) Basic principles of quality assurance,

(b) 10CFR50 Appendix B,

(c) The contents of this Policy Document

(d) QA documents, as applicable.

Table 1 identifies the structures, systems, and major components associated with CNS covered by this program. Table 1 is not intended to be all inclusive. The Operations, Support and Engineering Divisions, with the assistance of the QA Division, will identify essential SSCs to be included within the scope of the QA Program. The QA Program is designed to provide control over all activities affecting quality of essential items to a degree consistent with their safety-related importance. These activities will be governed by approved plans and instructions and these documents shall be followed under controlled conditions.

In addition to essential SSCs, applicable portions of the QA Program shall be applied to selected nonessential SSCs important to station reliability and performance. Specific application will be identified in station procedures.

2.14 10CFR50, Appendix B, Criterion XIV: Inspection, Test, and Operating Status

A "tagout" system shall be appropriately utilized to prevent unauthorized operation or adjustment which could endanger the safety of personnel, damage equipment, or invalidate the results of tests already performed. These tags shall indicate abnormal equipment test and inspection status and reference special instructions for equipment located throughout the CNS.

Tagout procedures, where necessary, shall require that equipment be tagged and that the associated power supplies, starters, switches and controls on the main control panel are tagged as well, to warn against operation. In some cases, power supplies will be disconnected and tagged to prevent inadvertent operation. Tagout will be controlled in accordance with station tagout procedures by a licensed Senior Reactor Operator. Records will be maintained to enable operators and Shift Managers to determine the status of the equipment tagged. The Nuclear Power Group will periodically verify the status of equipment tagged by performing an audit or surveillance.

A configuration change control program will be maintained to provide a method for recording the installation and removal of jumpers, fuses, or wire terminal disconnections. This record will include the location, reason, name of person authorizing action, and name of person performing the installation.

2.16 10CFR50, Appendix B, Criterion XVI: Corrective Action

The CAP for CNS shall provide measures to assure that conditions adverse to quality such as failures, malfunctions, deficiencies, deviations, defective materials and equipment, and nonconformances, are promptly identified and corrected. Measures taken to disposition significant conditions adverse to quality shall include: immediate actions taken, the cause of the condition, corrective actions, and actions taken to preclude recurrence. The identification of significant conditions adverse to quality shall be documented and reported to the appropriate levels of management. A monthly report of open CAP items shall be prepared and distributed to Senior Level Management and Department Management personnel, including the Site VP.

The CAP shall be utilized by all personnel performing operation, maintenance, modification, or other quality-related functions or activities at CNS, to document and report such deficiencies or discrepancies as:

(a) Deviations from approved procedures.

(b) Nonconforming materials, parts, or components received from outside suppliers via essential end use procurement documents.

(c) Nonconforming materials, parts, or components within the plant.

(d) Nonconforming materials brought on site without following established receiving and inspection procedures.

(e) Orders or recommendations to stop work.

(f) Reportable occurrences.

(g) Any other deficiency which violates the intent of the QA Program and which could have a significant adverse effect on quality.

(h) Deviations which could be reportable under 10CFR21.

(i) Violations of regulations or code requirements.

Failures, malfunctions, deficiencies, unusual operating experiences, and deviations which require formal reporting to the NRC will be reviewed and evaluated by the SORC and, where appropriate, by the SRAB. It will be the responsibility of CNS personnel to identify and promptly correct all such deficiencies or malfunctions either by improved maintenance, repairs, replacements, or modification. In all cases, the objective and the corrective action will not only be to correct the existing defect or deficiency, but also to include measures to determine cause and prevent recurrence of similar failures. QA activities will verify that corrective action is performed in accordance with approved written procedures and that the details of the corrective action are properly documented for the permanent station records.

4.0 QUALITY ASSURANCE DOCUMENTS

The CNS QA Program is defined by written policies, procedures, and plans which shall be implemented throughout the operating life of the station. Station procedure 0-QA-01, "CNS Quality Assurance Program," further describes the requirements of and implements the QA Program at CNS.

4.1 Station Procedures

The CNS Operations Manual contains station procedures and is based on the requirements of the QA Program. Preparation and maintenance of basic work procedures is separate from the QA Division procedures. The applicable criteria of 10CFR50 Appendix B shall be incorporated into the basic work procedures as they are initiated and implemented. Such initiation and use by the line organization shall be consistent with responsibilities as described by the Three Level QA Program (Table 2). The QA Division shall provide independent oversight of work procedures randomly, periodically, and situationally, at any stage of procedure generation, implementation, or closeout.

Quality Assurance Procedures will be maintained and revised in accordance with station procedures.

4.2 Nuclear Quality Procedures (NQPs)

The QA Division staff shall prepare NQPs approved by the General Manager of NPA and the VP - Nuclear. As described in Section 1.3 of this Policy Document, NQPs define QA activities and responsibilities which cross divisional boundaries. When approved, NQPs become a part of the CNS QA Program.

4.3 Quality Assurance Plans (QAPs)

QAPs shall define the scope of the QA Program. QAPs shall be prepared by the QA Division and shall be reviewed and approved by the General Manager of NPA. As described in Section 1.3 of this Policy Document, QAPs outline specific QA activities and shall become a part of the CNS QA Program. The QAPs shall define the specific work which is to be subjected to QA review, surveillance, and audit, and the manner in which such review, surveillance, and audit is to be implemented. Checklists shall be prepared per the guidance provided in NQPs, defining the scope of QA Surveillance or QA Audit activities. Distribution of these Plans will be to those individuals who are responsible for that particular activity.

5.0 REFERENCES

The following documents were used in the preparation of the CNS QA Program. It is intended that these documents be used on a continuing basis in the performance of QA activities for station operation since they offer measurement criteria against which the QA Program can be evaluated.

5.1. 10CFR50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants."

5.2. 10CFR50.54, "Conditions of Licenses."

5.3. 10CFR73, "Physical Protection of Plants and Materials."

| 5.4. NRC Generic Letter 86-10, "Implementation of Fire Protection Requirements," dated
| April 24, 1986

| 5.5. NRC Generic Letter 88-12, "Removal of Fire Protection Requirements from Technical
| Specifications," dated August 2, 1988.

| 5.6. NRC Generic Letter 82-21, October 6, 1982, "Technical Specifications for Fire Protection Audits."

| 5.7. NRC Generic Letter 88-18, October 20, 1988, "Plant Record Storage on Optical Discs."

| 5.8. ANSI 18.7 - 1972, "American National Standard for Administrative Controls for Nuclear Power Plants."

| 5.9. ANSI N45.2-1977, "Quality Assurance Requirements for Nuclear Power Plants."

| 5.10. ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants."

| 5.11. ANSI N45.2.6-1978, "Qualifications of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants."

| 5.12. ANSI N45.2.10-1973, "Quality Assurance Terms and Definitions."

| 5.13. ANSI N45.2.11-1974, "Quality Assurance Requirements for the Design of Nuclear Power Plants."

| 5.14. ANSI N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants."

| 5.15. ANSI N45.2.13-1976, "Supplementary Quality Assurance Requirements for Control of Procurement of Equipment, Materials, and Services for Nuclear Power Plants."

| 5.16. ANSI N45.2.23-1978, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants."

| 5.17. Selected NRC Safety and/or Regulatory Guides for Water-Cooled Nuclear Power Plants, as appropriate.

| 5.18. ASME Section III, 1965 Edition, paragraph N-415.2.

| 5.19. ASME Section III, 1968 Edition, Summer Addenda, paragraphs N-412(t)(3), and N-417.10(f).

| 5.20. NIRMA TG11-1998, "Authentication of Records and Media," Section 4.

| 5.21. NUMARC 93-01, Revision 2, "Nuclear Energy Institute Industry Guideline for Monitoring The Effectiveness of Maintenance at Nuclear Power Plants April 1996."

| 5.22. CNS Technical Specifications.

| 5.23. CNS Environmental Report--Operating License Stage (NRC Docket 50-298).

| 5.24. CNS USAR (NRC Docket 50-298).

| 5.25. CNS Technical Requirements Manual (TRM).

| 5.26. CNS Offsite Dose Assessment Manual (ODAM).

| 5.27. CNS Operations Manual (station procedures).

| 5.28. Letter QAC93416 from G.E. Smith (NPPD QA) to G.R. Horn (NPPD SRAB Chair), dated September 8, 1993, "Clarification of NPPDs QA Audit Frequency Requirements."

| 5.29. Letter NSD940132 from G.R. Horn (NPPD) to U.S. NRC, dated March 1, 1994, "Annual Operating Report" (contains information regarding changes to audit frequency commitments from Letter QAC93416).

| 5.30. NPPD Safety Rules.

| 5.31. Utilities Service Alliance (USA) 10CFR50.59 Resource Manual, Revision 0.

TABLE 1:
SYSTEMS AND COMPONENTS WITHIN THE SCOPE OF THE QUALITY ASSURANCE PROGRAM[1,2]

I. NUCLEAR STEAM SUPPLY SYSTEM

- A. Reactor Pressure Vessel
- B. Reactor Pressure Vessel Supports
- C. Control Rods and Drive System Equipment Necessary for Scram Operation
- D. Control Rod Drive Housing
- E. Fuel Assemblies
- F. Core Shroud
- G. Steam Dryer
- H. Steam Separator

II. REACTOR COOLANT SYSTEMS

- A. ADS - Automatic Depressurization System
- B. HPCI - High Pressure Coolant Injection System
- C. LPCI - Low Pressure Coolant Injection System
- D. CS - Core Spray System
- E. RCIC - Reactor Core Isolation Cooling

III. REACTOR PROTECTION AND ENGINEERED SAFEGUARD SYSTEMS

- A. Reactor Protection System
- B. Standby Liquid Control
- C. Standby Gas Treatment
- D. Emergency Diesel Generators
- E. Electrical Auxiliary Power
  1. Critical 4160 V Equipment
  2. Critical 480 V Equipment
- F. Neutron Monitoring Systems
  1. APRM - Average Power Range Monitor
  2. IRM - Intermediate Range Monitor
  3. LPRM - Local Power Range Monitor