



TO: NRC Document Control Desk- CONTROLLED DISTRIBUTION NO. 53

FROM: LACBWR Plant Manager

1/10/2012

SUBJECT: Changes to LACBWR Controlling Documents

I. The following document has been revised:

LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD),
Revision 24

Instructions:

Remove and replace Statement of Quality Assurance Policy.
Remove and replace Table of Contents.
Remove and replace all sections of the QAPD.

(Also included for information is the DPC transmittal letter with description of changes.)

- ☐ The material listed above is transmitted herewith. Please verify receipt of all listed material, destroy superseded material, and sign below to acknowledge receipt.
- ☐ The material listed above has been placed in your binder.
- ☐ Please review listed material, notify your personnel of changes, and sign below to acknowledge your review and notification of personnel. [To be checked for supervisors for department specific procedures and LACBWR Technical Specifications.]
- ☐ The material listed above has been changed. [To be checked for supervisors when materials applicable to other departments are issued to them.]

/S/ _____ DATE _____

Please return this notification to the LACBWR Secretary within ten (10) working days.

Q004
FSME20
FSME



January 9, 2012

In reply, please refer to LAC-14209

DOCKET NO. 50-409

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Dairyland Power Cooperative
La Crosse Boiling Water Reactor (LACBWR)
Possession-Only License No. DPR-45
Quality Assurance Program Description

REFERENCES: (1) 10 CFR 50, Section 50.54(a)(3) and 50.4 (b)(7)
(2) 10 CFR 50.71

In accordance with References (1) and (2), we are submitting Revision 24 of our Quality Assurance Program Description (QAPD).

Page change locations are indicated by a bold bar in the right-hand margin. The changes in this revision are described in the attached Summary of Changes.

The QAPD is being distributed in its entirety.

The above described changes are administrative in nature or are changes internal to the LACBWR Organization and do not constitute a reduction in commitment to quality.

Please contact Don Egge (608-689-4207) of my staff with any questions or comments you may have regarding this submittal.

Sincerely,

William L. Berg, President and CEO

WLB:DGE:jkl



January 9, 2012

Enclosures

cc w/enc: Mark Satorius, Region III Administrator
John Hickman, NRC Project Manager

STATE OF WISCONSIN)

)
COUNTY OF LA CROSSE)

Personally came before me this 10th day of January, 2012, the above-named William L. Berg, to me known to be the person who executed the foregoing instrument and acknowledged the same.

LAURIE A. ENGEN
Notary Public
State of Wisconsin

Laurie A. Engen
Notary Public, La Crosse County

My commission expires 5/25/2014

**LACBWR
QUALITY ASSURANCE PROGRAM DESCRIPTION
(QAPD)**

Revision 24

Impact Evaluation and Summary of Changes

In an effort to more effectively and efficiently manage work activities at the LACBWR site during the upcoming dry cask storage loading campaign, the roles and responsibilities of key members of the management team are being realigned. The temporary position of Assistant Plant Manager has been established to provide assistance to the Plant Manager by assuming the functional direction of the plant staff (operational, maintenance, and administrative staff). This realignment will enable the Plant Manager to concentrate on the management of site's most pressing task of safe movement to dry cask storage of the spent fuel inventory. No quality requirements are being removed or altered as a result of adding the position of Assistant Plant Manager.

A telephonic discussion with LACBWR's NRC Project Manager was held on December 21, 2011, to convey the proposed organizational changes and the reasoning for this important managerial realignment. No adverse response to the proposed changes was received.

10 CFR 50.54(a)(1) states, in part, that each nuclear power plant or fuel reprocessing plant licensee subject to the quality assurance criteria in appendix B of this part shall implement, under § 50.34(b)(6)(ii) or § 52.79 of this chapter, the quality assurance program described or referenced in the safety analysis report, including changes to that report.

The regulation further states in subpart (3) that each licensee described in paragraph (a)(1) of this section may make a change to a previously accepted quality assurance program description included or referenced in the Safety Analysis Report without prior NRC approval, provided the change does not reduce the commitments in the program description as accepted by the NRC. The changes proposed in Revision 24 to the QAPD do not represent a reduction in commitment because no quality requirements are removed. The addition of the Assistant Plant Manager merely shifts select responsibilities to this position while the Plant Manager maintains overall responsibility for the safe storage of the spent fuel inventory. The below listed changes are proposed to the currently approved LACBWR QAPD with an accompanying explanation which illustrates that these changes do not represent a reduction in written commitments contained in the previous revision of the QAPD.

The following changes are proposed for the LACBWR QAPD in Revision 24:

Section I, Organization, Part A, "Organization"

Item 3: Responsibilities of the Plant Manager for activities pertaining to the operations, maintenance, and administrative staff have been assigned to the new position of Assistant Plant Manager. The Plant Manager shall retain overall responsibility for safety of the facility and the Independent Spent Fuel Storage Installation (ISFSI) as stated in the LACBWR Decommissioning Plan (FSAR).

Item 4: The position of Assistant Plant Manager (APM) has been added reporting directly to the Plant Manager having responsibilities for the functional direction of the plant staff, (operations, maintenance, and administrative staff). The Plant Manager retains overall responsibility for implementation of quality requirements and responsibilities for reportability.

Note added after Item 4: "Note: The Assistant Plant Manager will have signature responsibility on procedures and instructions required to implement the requirements of this Plan for plant-related activities. Plans, procedures and instructions need not be revised to note this title change." This note provides clarification for implementation of this enhanced organizational change; however, the Plant Manager retains ultimate responsibility.

Item 5: The term "Regulatory Matters" with respect to Manager, Quality Assurance (MQA) reporting has been more correctly changed to "quality assurance matters."

Item 9: The Operations, Training/Relief Supervisor will report directly to the APM; however, the Plant Manager retains ultimate responsibility for plant operations and training.

Item 12: The Fire Protection Supervisor will report directly to the APM; however, the Plant Manager retains ultimate responsibility for fire protection.

Item 13: The Health and Safety/Maintenance Supervisor will report directly to the APM; however, the Plant Manager retains ultimate responsibility for plant radiation protection, safety, and maintenance.

Item 20: The position of Utility Worker has been included with the Mechanical Personnel as that position is assigned to that group of workers.

Item 22: The Technical Support Staff provide both plant and project support services and, therefore, are responsible to both the Plant Manager and APM.

Item 23: The Administrative Staff will report directly to the APM.

Item 24 and 24.a: It was added that the ORC advisory role is to the APM on operations and nuclear safety as these areas functionally report to the APM.

Item 24.b: Chairman of the ORC was changed from Plant Manager to APM; however, the Plant Manager retains ultimate responsibility for plant operations. The Members of the ORC changed from Engineering Staff to Engineering staff as there is not a organizational position of Engineering Staff.

Item 24.g.1): The determination of the need for changes to procedures was changed from Plant Manager to APM as the APM has daily responsibilities for plant procedures; however, the Plant Manager retains ultimate responsibility for plant operations.

Item 24.h.1): It was added that the APM is to receive notification of recommendations for approval or disapproval of programs and procedures as the APM has daily responsibilities for plant programs and procedures.

Item 24.h.3): Changed Plant Manager to APM in discussion of disagreements between ORC members and ORC Chairman due to assignment of the APM to the role of Chairman of ORC. Plant Manager is still responsible to resolve disagreements, thus maintaining the original QAPD commitment.

Item 25.b: Added APM as a member of the SRC to ensure daily operations issues are monitored and routinely presented to the SRC membership. The Plant Manager remains the senior plant representative on the SRC.

Section III, Design Control and Review, Part B, "Responsibilities"

Item 1: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff." This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 2: Changed responsibility from QA Department to Technical Support Staff as responsible for the review of design drawings, specifications, calculations, and procurement documents to assure that quality standards are included or referenced. This is a correction since QA Department performs oversight of the process, thus assuring independence of the process.

Item 4: Changed submittal of ORC changes and recommendations from the Plant Manager to the APM since he is the chairman of the ORC and has functional responsibility of plant changes; this does not reduce effectiveness since the Plant Manager retains ultimate responsibility for plant operations.

Item 5: Changed review of ORC recommendations from the Plant Manager to the APM since the APM is the chairman of the ORC and has functional responsibility of plant changes; however, the Plant Manager retains ultimate responsibility for plant operations.

Section IV, Procurement Document Control, Part B, "Responsibilities"

Items 1, 2 and 4: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff." This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 6: Added Item 6 stating, "The Quality Assurance Department is responsible for review of all procurement documents to ensure inclusion of appropriate quality requirements." This specific item was incorrectly included under Section III, Item 2.

Section IV, Procurement Document Control, Part C, "Requirements"

Item 5: Removed "and engineering specifications" as well as "technical and" from Item 5 that states, "Purchase requisitions and engineering specifications shall be reviewed by

the Quality Assurance Department to assure that all necessary technical and quality requirements are included or referenced.” These activities are more appropriately performed by the Technical Support Staff as established in Section III and enable the Quality Assurance Department to maintain its independence.

Item 7: Removed Item 7 that stated, “The Plant Manager’s approval is required prior to any changes being implemented to previously approved quality control orders.” The Plant Manager’s approval of the initial document was not required in this section.

Section V, Instructions, Procedures, and Drawings, Part B, “Responsibilities”

Item 1: Changed the responsibility title from “LACBWR Staff” to “LACBWR staff.” This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 4: Changed to state, “The Assistant Plant Manager is responsible for approval of plant related procedures.” since the APM is the chairman of the ORC.

Section V, Instructions, Procedures, and Drawings, Part C, “Requirements”

Item 5: Changed approval of ORC reviewed changes to plant procedures from the Plant Manager to the APM since the APM is the ORC Chairman and has functional responsibility of plant procedure changes; however, the Plant Manager retains ultimate responsibility for plant safety.

Section VI, Document Control Part B, “Responsibilities”

Item 1: Changed the responsibility title from “LACBWR Staff” to “LACBWR staff.” This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 3: Changed to state, “The Plant Manager is responsible for preparation of a standard procedure for controlling the issuance of project related drawings and specifications. The Assistant Plant Manager has responsibility for corresponding plant activities.” This change clarifies the division of responsibilities between the Plant Manager and APM; however, the Plant Manager retains ultimate responsibility for plant operations.

Section VII, Control of Purchased Material, Equipment, and Services, Part B, “Responsibilities”

Item 2: The term Engineering Staff is changed to Technical Support Staff as there is no organizational position of Engineering Staff.

Item 3: Changed the responsibility title from “LACBWR Staff” to “LACBWR staff.” This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Section VIII, Identification of Material, Parts, and Components, Part B, "Responsibilities"

Item 1: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff." This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 2: Changed to state, "The Plant Manager shall approve and ensure implementation of procedures for the identification and control of materials, parts, and components utilized on projects. The Assistant Plant Manager has responsibility for corresponding plant activities." This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Section IX, Control of Special Processes, Part B, "Responsibilities"

Item 2: Changed to add review of procedures by QA and changed Plant Manager's responsibility to project activities and APM's responsibility for plant activities by stating:

"The Quality Assurance Department is responsible for preparing/reviewing of procedures for welding, heat treating, cleaning, non-destructive examination, and filler metal control. The Plant Manager is responsible for assuring the qualification of personnel in special processes and maintaining records of qualified personnel and procedures performing project activities. The Assistant Plant Manager has responsibility for corresponding plant activities." This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Section X, Inspection, Part B, "Responsibilities"

Item 3: Changed to state, "The Plant Manager shall be responsible for approving project related inspection procedures. The Assistant Plant Manager has responsibility for corresponding plant activities." This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Item 4: Changed to state, "The Plant Manager shall ensure sufficient inspections are performed to provide adequate confidence that project activities meet predetermined requirements. The Assistant Plant Manager has responsibility for corresponding plant activities." This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Section XI, Test Control, Part B, "Responsibilities"

Item 1: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff." This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 2: Changed the phrase, “Engineers and/or Management Staff,” to “The Technical Support Staff,” as there is no organizational position of Engineers and/or Management Staff. These personnel are part of the Technical Support Staff.

Item 3: Changed to state, “The Plant Manager is responsible for the approval of project related test procedures. The Assistant Plant Manager is responsible for the conduct of all testing associated with the LACBWR plant.” This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Item 4: Changed the phrase, “Engineering or Management Staff,” to “The Technical Support Staff,” as there is no organizational position of Engineering or Management Staff. These personnel are part of the Technical Support Staff.

Section XII, Control of Measuring and Test Equipment, Part B, “Responsibilities”

Item 1: Changed the responsibility title from “LACBWR Staff” to “LACBWR staff.” This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 2: Changed to state, “Personnel using Measuring and Test Equipment are responsible for ensuring tools, gauges, instruments, and other measuring and test equipment are calibrated to assure compliance with the implementing procedures.” This change clarifies individual responsibility to ensure properly calibrated measurement and test equipment is used.

Item 3: Changed to state, “The Plant Manager is responsible for ensuring implementation of the requirements of this section of the manual for project related activities. He is also responsible for approving project related procedures. The Assistant Plant Manager has responsibility for corresponding plant activities.” This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Section XIII, Handling, Storage, and Shipping, Part B, “Responsibilities”

Item 1: Changed the responsibility title from “LACBWR Staff” to “LACBWR staff.” This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 2: Changed to state, “The Plant Manager is responsible for ensuring implementation of the requirements of this section of the Quality Assurance Program Description and approval of all implementing procedures related to projects. The Assistant Plant Manager has responsibility for corresponding plant activities.” This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Section XIV, Inspection, Test, and Operating Status, Part B, "Responsibilities"

Item 1: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff". This change is made since there is no Organizational position titled as Staff; instead it refers to all staff personnel.

Section XV, Nonconforming Materials, Parts, or Components, Part B, "Responsibilities"

Items 1 and 2: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff." This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Section XV, Nonconforming Materials, Parts, or Components, Part C, "Requirements"

Item 3: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff." This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 3: Changed approval from Plant Manager to Assistant Plant Manager for use of items with a known deficiency as the APM has responsibility for the Corrective Action Program. This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Section XVI, Corrective Action, Part B, "Responsibilities"

Item 1: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff." This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 3: The phrase, "LACBWR Staff" is replaced appropriately by "Technical Support Staff" to properly reflect organizational positions and responsibilities.

Section XVI, Corrective Action, Part C, "Requirements"

Item 2: Conditions adverse to quality which involve design deficiencies, or recommended corrective actions that involve a design change, shall be reviewed by the Technical Support Staff.

Section XVII, Quality Assurance Records, Part B, "Responsibilities"

Item 1: Changed the responsibility title from "LACBWR Staff" to "LACBWR staff". This change is made since there is no organizational position titled as Staff; instead it refers to all staff personnel.

Item 2: The Assistant Plant Manager is responsible for approving and ensuring implementation of procedures for this section. The APM is responsible for administrative activities; however, the Plant Manager retains ultimate responsibility for plant records.

Section XVIII, Audits, Part C, "Requirements"

Item 8: Changed statement to read "Deficiencies or non-conformances identified during an audit shall be documented and brought to the attention of the Plant Manager for project related issues and the Assistant Plant manager for plant related issues." This change clarifies the division of responsibilities between the Plant Manager and Assistant Plant Manager; however, the Plant Manager retains ultimate responsibility for plant operations.

Table 1, QAPD, Implementing Procedures, and Regulatory Cross Reference Matrix has been updated to include new and changed procedures.

Figure 1, Facility Organization has been revised to reflect addition of the position of Assistant Plant Manager, and added relationship of Technical Support Staff to the Assistant Plant Manager.

DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR

STATEMENT OF QUALITY ASSURANCE POLICY

The Quality Assurance Program described herein has been developed by Dairyland Power Cooperative (DPC) to assure safe and reliable operation of the La Crosse Boiling Water Reactor (LACBWR) in a SAFSTOR condition and transition to an Independent Spent Fuel Storage Installation (ISFSI). This program is designed to meet the requirements of Title 10 of the Code of Federal Regulations, Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," as it would apply to a possession-only condition and Title 10 of the Code of Regulations, Part 72, Licensing Requirements for the Independent Storage of Spent Nuclear Fuel, High-Level Radioactive Waste, and Reactor-Related Greater Than Class C Waste, Subpart G, "Quality Assurance".

The Quality Assurance Program applies to all activities affecting the functions of the structures, systems, and components that are associated with a possession-only license using a graded approach. These activities include design, installation, operations, maintenance, repair, fuel handling and storage, testing and modifications. Design and fabrication of shipping casks used for shipment of radioactive material will not be conducted under this Quality Assurance Program.

The DPC Manager, Quality Assurance, is responsible for the establishment and implementation of a Quality Assurance Program which meets the requirements of 10 CFR 50, Appendix B, and 10 CFR 72, Subpart G.

William L. Berg
(President & CEO)

Jan 10, 2012
(Date)

QUALITY ASSURANCE PROGRAM DESCRIPTION

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B. Terms and Definitions

The terms and definitions listed below are used frequently throughout this document.

COMPANY - Dairyland Power Cooperative (DPC)

LACBWR - La Crosse Boiling Water Reactor.

QUALITY ASSURANCE (QA) - All those planned and systematic actions necessary to provide adequate confidence that structures, systems, or components (SSCs) will perform satisfactorily in service.

QUALITY CONTROL (QC) - Those quality actions which provide a means to control and measure the characteristics of an item, process or facility to established requirements.

ORC - Operations Review Committee.

FACILITY - Encompasses the site and plant systems which support a possession-only license (SAFSTOR) condition and the ISFSI site, but excludes electric power transmission apparatus located beyond the site switchyard.

PLANT - Encompasses the SSCs which support a possession-only license (SAFSTOR) condition.

PLANT PROCEDURE - A document describing the manner of conducting an action or process.

ADMINISTRATIVE CONTROL PROCEDURE (ACP) - A document which establishes the guidelines and requirements governing functional activities (i.e., Administration, Material Request, Control Room Log, etc.).

QUALITY ASSURANCE INSTRUCTION (QAI) - A document which establishes the guidelines and requirements governing quality assurance activities.

QA MANUAL - Manual comprised of the QA Program Description and supplemental Quality Assurance Project Plan.

QUALITY ASSURANCE PROJECT PLAN (QAPP) - A documented plan that defines the Quality Assurance program requirements applicable to the Dry Cask Storage (DCS) project including licensing, siting, site design, procurement, vendor selection, fabrication, shipping, receiving, storing, cleaning, erecting, site installation, inspecting, testing, cask loading, cask sealing, cask handling, preparation for ISFSI operation, and associated plant modification activities. This Plan may also be utilized for other site activities as designated by the Plant Manager.

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SRC - Safety Review Committee.

SCHEDULE INTERVAL - A time frame within which a scheduled activity shall be performed with a maximum allowable extension not to exceed 25 percent of the schedule interval.

IMPORTANT TO SAFETY (ITS) – A classification given to SSCs that provide nuclear safety functions.

10 CFR 50 nuclear safety functions of LACBWR Plant ITS SSCs are:

- Maintain the conditions required to store spent fuel safely,
- Prevent damage to the spent fuel container during handling and storage, and
- Provide reasonable assurance that spent fuel can be handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.

10 CFR 71 and 10 CFR 72 nuclear safety functions of Independent Spent Fuel Storage Installation (ISFSI) ITS SSCs are:

- Maintain sub-criticality,
- Maintain confinement,
- Ensure that radiation dose rates and dose to workers and the public do not exceed acceptable levels (and remain ALARA),
- Maintain retrievability, and
- Maintain heat removal capability (as necessary to meet the above criteria).

LACBWR Plant or ISFSI SSCs, tasks, and hardware determined to be ITS are further categorized into one of three quality assurance classification categories: ITS-A, ITS-B, or ITS-C.

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4. Assistant Plant Manager (APM) reports directly to the Plant Manager and has responsibility for the functional direction of the plant staff (operational, maintenance and administrative staff). All activities pertaining to the LACBWR plant are coordinated through the Assistant Plant Manager.

Note: The Assistant Plant Manager will have signature responsibility on procedures and instructions required to implement the requirements of this Plan for plant related activities. Plans, procedures, and instructions need not be revised to note this title change.

5. Manager, Quality Assurance (QA) reports directly to the Director, Generation Support Services, with direct access to the DPC President & CEO, if necessary, for quality assurance matters. He has responsibility for establishing a quality assurance program and performing audits of the program to determine its effectiveness. The Manager, QA, has the authority to stop fabrication, installation, or testing of structures, systems, or components that do not conform to specifications or approved procedures.
6. Project Manager (PM), when required, reports directly to the Plant Manager on all DCS project activities and is responsible for the implementation of the QAPP for the duration of the DCS project and other site activities as designated by the Plant Manager. He has full authority and accountability for successful project planning and execution including effective implementation of the QAPP. The PM is responsible for contract management and development of contract deliverables in accordance with quality requirements defined in the QAPP. The PM is responsible for ensuring that applicable project quality and technical requirements are transmitted to, addressed by, and acceptably implemented by the project's subcontractors.
7. Quality Assurance Department Personnel report directly to the Manager, QA, and are responsible for assuring that the activities required by the QA Program are implemented.
8. Director, Generation Support Services, reports directly to the VP, Generation Division, and has corporate oversight of the QA Department.
9. Operations, Training/Relief Supervisor reports directly to the Assistant Plant Manager and has responsibility for safe operation of the facility as well as establishing and implementing a training and requalification program for all facility personnel in accordance with applicable regulations. He ensures that regular inspections of the facility are performed, and he is responsible for the review of all log sheets,

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malfunction reports, and surveillance records. He is concerned with the detailed operation and maintenance of the facility. He enforces all facility operating and safety procedures and ensures that approved operating and maintenance procedures are followed.

10. Shift Supervisors report directly to the Operations, Training/Relief Supervisor and are responsible for the safe operation of the facility when on shift and for maintaining complete control of all activities performed on shift and ensuring that all operations are conducted safely and according to approved procedures and specifications.
11. Fuel Handlers report directly to the Shift Supervisor and are responsible for safe operation of LACBWR plant components and systems to support safe storage of spent fuel.
12. Fire Protection Supervisor reports directly to the Assistant Plant Manager and is responsible for the administration and implementation of LACBWR's fire protection program.
13. Health and Safety/Maintenance Supervisor reports directly to the Assistant Plant Manager and is responsible for the administration, maintenance, and implementation of the Radioactive Waste Program, Plant Chemistry Program, Radiation Protection Program, and Environmental Monitoring Program. Directly supervises and coordinates all activities relating to maintenance of the facility and is responsible for maintenance records and ensures that approved maintenance procedures are followed.
14. Health and Safety Foreman reports directly to the Health and Safety/Maintenance Supervisor and is responsible for assisting in the administration, maintenance, and implementation of the Radioactive Waste Program, Plant Chemistry Program, Radiation Protection Program and Environmental Monitoring Program.
15. Health Physics Personnel report directly to the Health and Safety/Maintenance Supervisor and are responsible to adhere to the requirements of the Radioactive Waste Program, Plant Chemistry Program, Radiation Protection Program, and Environmental Monitoring Program.
16. Instrument Foreman reports directly to the Health and Safety/Maintenance Supervisor and is responsible for coordinating the calibration, testing, maintenance, and modifications of LACBWR's plant instrument systems and components.

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17. Mechanical Foreman reports directly to the Health and Safety/Maintenance Supervisor and is responsible for the maintenance and modification of LACBWR's plant mechanical systems and components.
18. Electrical Foreman reports directly to the Health and Safety/Maintenance Supervisor and is responsible for the testing, maintenance and modification of LACBWR's plant electrical systems and components.
19. Instrument Personnel report directly to the Health and Safety/Maintenance Supervisor and are responsible for the calibration, testing, maintenance, and modifications of LACBWR's plant instrument systems and components.
20. Mechanical and Utility Worker Personnel report directly to the Health and Safety/Maintenance Supervisor and are responsible for the maintenance and modification of LACBWR's plant mechanical systems and components.
21. Electrical Personnel report directly to the Health and Safety/Maintenance Supervisor and are responsible for the testing, maintenance and modification of LACBWR's plant electrical systems and components.
22. Technical Support Staff consists of on-site engineers (Technical Support and Reactor/Radiation Protection) and off-site engineers, covering various disciplines, and/or contractors whose services are deemed necessary and are all responsible to either the Plant Manager or the Assistant Plant Manager. They provide technical services in areas of licensing, analyzing test results, design changes, projects, and may, as requested, perform audits to provide assurance that facility activities are being performed consistent with approved procedures and licensing provisions.
23. Administrative Staff reports directly to the Assistant Plant Manager and is responsible for maintenance of LACBWR's QA records, procedures, and indexes.
24. The Operations Review Committee (ORC) is an advisory committee to the Plant Manager and Assistant Plant Manager. They review facility operations and verify implementation of site quality assurance practices. Minutes of ORC meetings are distributed to the Safety Review Committee (SRC).

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- a. The Operations Review Committee shall function to advise the Plant Manager and Assistant Plant Manager on all matters related to nuclear safety.
- b. The Operations Review Committee shall be composed of the following:

Chairman: Assistant Plant Manager
Members: LACBWR Management and Engineering staff
- c. ORC members shall meet minimum qualifications as specified in Technical Specification 6.3.
- d. All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.
- e. The ORC shall meet at least once per calendar quarter and as convened by the ORC Chairman or his designated alternate.
- f. The minimum quorum of the ORC necessary for the performance of the ORC responsibility and authority provisions shall consist of the Chairman, or his designated alternate, and three (3) members, including alternates.
- g. The ORC shall be responsible for:
 - 1) Review of [1] all procedures required by Section V of this Program and changes thereto, [2] any other proposed procedures or changes thereto as determined by the Assistant Plant Manager to affect nuclear safety.
 - 2) Review of all proposed tests and experiments that affect nuclear safety.
 - 3) Review of all proposed changes to the Appendix "A" Technical Specifications.
 - 4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
 - 5) Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the President & CEO and to the Safety Review Committee (SRC).

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- 6) Review of all Reportable Events.
 - 7) Review of plant operations to detect potential nuclear safety hazards.
 - 8) Performance of special reviews, investigations or analyses and reports thereon as requested by the Plant Manager or SRC
 - 9) Review of the Contingency Plan, the Security Plan, the Training Qualification Plan, and the Unescorted Access Authorization, Fitness for Duty and Behavior Observation Programs.
 - 10) Review of the Emergency Plan and implementing procedures.
 - 11) Review of the Process Control Program (PCP).
 - 12) Review of the Decommissioning Plan.
 - 13) Review of the Offsite Dose Calculation Manual (ODCM).
 - 14) Review of the Fire Protection Program and implementing procedures.
 - 15) Review of significant conditions adverse to quality and for recommending corrective actions.
- h. The ORC shall:
- 1) Recommend in writing to the Plant Manager and the Assistant Plant Manager approval or disapproval of items considered under g (1) through (15) above.
 - 2) Render determinations in writing with regard to whether or not each item considered under g (1) through (4) above requires a license amendment.
 - 3) Provide written notification within 24 hours to the President & CEO and the SRC of disagreement between the ORC and the Assistant Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements.
- i. The ORC shall maintain written minutes of each ORC meeting that, at a minimum, document the results of all ORC activities performed under the responsibility and authority provisions. Copies shall be provided to the President & CEO, and the SRC.

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25. The Safety Review Committee (SRC) is an advisory committee responsible to the President & CEO for independent reviews and audits to verify that the facility is being maintained consistent with company safety, administrative, and licensing provisions.
- a. The SRC shall function to provide independent review and audit of aspects of plant nuclear safety.
 - b. The SRC shall be composed of a Chairman and a minimum of three members who are appointed by the DPC President & CEO or the VP, Generation. The Chairman shall be appointed by the President & CEO. In addition, the Plant Manager and Assistant Plant Manager are members of the SRC. SRC members appointed by the President & CEO or VP, Generation, shall not be members of the plant staff.
 - c. All SRC alternate members shall be appointed in writing by the DPC President & CEO or VP, Generation, to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SRC activities at any one time.
 - d. Membership to the SRC requires that an individual meet one or more of the academic and/or experience requirements listed below. The majority of the SRC members shall meet the requirements of No. (1).
 - 1) Bachelor Degree in Engineering or the physical sciences, plus five years' total experience in one or more of the below listed disciplines.
 - 2) Nine years' combined total experience in one or more of the below listed disciplines.
 - Nuclear Power Plant Technology
 - Facility Operations
 - Power Plant Design
 - Engineering/Nuclear Engineering
 - Radiation Safety
 - Safety Analysis
 - Instrumentation and Control
 - Quality Assurance

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- e. Consultants shall be utilized, as determined by the SRC Chairman, to provide expert advice to the SRC.
- f. The SRC shall meet at least once per year, and as deemed necessary by the SRC Chairman or the Plant Manager.
- g. The minimum quorum of the SRC necessary for the performance of the SRC review and audit functions shall consist of the Chairman, or his designated alternate, and at least three SRC members, including alternates. No more than a minority of the quorum shall have line responsibility for the facility.
- h. The SRC shall review:
 - 1) Evaluations performed by plant staff, pursuant to 10 CFR 50.59, where a determination has been that a license amendment is not required.
 - 2) Proposed license amendments prior to submittal to the NRC.
 - 3) Proposed changes to Appendix "A" Technical Specifications.
 - 4) Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
 - 5) Significant deviations from normal and expected performance of facility equipment that affects nuclear safety.
 - 6) All Reportable Events.
 - 7) All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
 - 8) Reports and meeting minutes of the ORC.
 - 9) Changes to the Contingency Plan and Plant Security Plan.
 - 10) Changes to the Emergency Plan.
 - 11) Changes to the Decommissioning Plan.
 - 12) Changes to the Offsite Dose Calculation Manual.

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13) Changes to the Process Control Program.

14) Changes to the Quality Assurance Program Description.

- i. Evaluations of plant activities performed by the Quality Assurance Department or a qualified off-site entity under the cognizance of the SRC. Refer to Section 18.C.6 for scheduled audit activities.
- j. The SRC shall report to and advise the President & CEO on those areas of responsibility listed in paragraphs 24.h and 24.i.
- k. Records of SRC activities shall be prepared, approved and distributed as indicated below:
 - 1) Minutes of each SRC meeting shall be prepared, approved and forwarded to the President & CEO within 20 days following each meeting.
 - 2) Audit reports encompassed by paragraph 21.i above, shall be forwarded to the President & CEO and to the management positions responsible for the areas audited within 30 days after completion of the audit.

B. Facility Organization Requirements

- 1. The facility organization includes one or more individuals trained in the various disciplines as noted in Figure 1.
- 2. Job descriptions have been provided for all personnel of the LACBWR staff. The job descriptions identify the authority and responsibility that are associated with the position.

C. Dairyland Power Cooperative Organization

Figure 2 shows the organization structure for Dairyland Power Cooperative. The LACBWR facility is a responsibility of the President & CEO. The Procurement Department has responsibility for all purchases as they apply to all generating stations, including LACBWR, and responsibility for control, identification, and issuance of all materials, parts, and components. Procurement is the responsibility of the Vice President and Chief Financial Officer.

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B. Applicability

The LACBWR QA Program is based on the requirements of 10 CFR 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," and Regulatory Guide 1.33 which addresses the applicable requirements of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," as they apply to a possession-only license and 10 CFR 72, Subpart G, as they apply to construction and operation of an ISFSI. Table 1 provides a matrix cross reference between the QAPD and 10 CFR 50, Appendix B, and Regulatory Guide 1.33.

The LACBWR QA program utilizes the Important To Safety classification process to apply and enforce a graded approach to quality in tasks related to Plant SSCs and DCS SSCs.

C. Implementation

Individuals assigned responsibilities, as discussed under "ORGANIZATION," shall prepare administrative and quality assurance procedures as necessary to implement the requirements of this program. Procedures shall include appropriate quantitative and qualitative acceptance criteria necessary to determine that the activity is being properly performed. Audit reports are distributed to DPC management for their review and assessment of the QA Program, as to effectiveness, scope, adequacy, and implementation. Indoctrination in the QA Program requirements shall be provided to all facility personnel and contractors performing activities which could affect the quality of components, systems, or structures.

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5. The Assistant Plant Manager is responsible for reviewing the recommendations for plant related activities from the Operations Review Committee and taking appropriate action. If prior approval is needed, he shall refer any License Amendment Request to the Safety Review Committee.
6. The Safety Review Committee is responsible for providing an independent review of changes to the facility. They shall provide assurance that the modification meets the design bases, regulatory requirements, and applicable codes and standards.

C. Requirements

1. A Work Order shall be initiated for all modifications to ITS SSCs and systems maintained operational during SAFSTOR and ISFSI activities. Work Orders may be initiated by any knowledgeable person.
2. A control procedure or process shall be used for all modifications to systems determined no longer necessary for SAFSTOR.
3. Design bases, regulatory requirements, and applicable codes and standards shall be delineated and specify appropriate quality standards and requirements for all proposed plant modifications to ITS SSCs and systems maintained operational during SAFSTOR and ISFSI activities. These conditions shall be incorporated into drawings, specifications, procurement documents, and procedures.
4. The Owner's Acceptance Review procedure and Work Control procedure shall describe and control design changes to ITS SSCs and ISFSI activities.
5. All proposed modifications shall be reviewed to determine whether they require prior NRC approval.

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	PROCUREMENT DOCUMENT CONTROL	
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C. Requirements

1. Purchase requisitions for new material, equipment, and services and for spare or replacement parts shall be initiated by any department personnel. The purchase requisition shall contain the information such as quantity, item description, and technical and quality requirements necessary for procurement of the item.
2. Purchase orders shall include specifications that contain all the information necessary to assure material, equipment, and services are of adequate quality. This shall include material selection, design data, equipment description, source inspection and testing requirements, cleaning and packaging requirements, and required documentation as deemed necessary.
3. Documentation required to provide evidence that materials, equipment, and services are of adequate quality shall be clearly delineated in purchase orders. This shall include a listing of each item of documentation to be submitted, when it is to be submitted, what requires approval prior to manufacture, and to whom it shall be submitted.
4. To the extent necessary, procurement documents shall require suppliers of material, equipment, and services to have a quality assurance program complying with the pertinent provisions of 10 CFR 50, Appendix B and 10 CFR 72, Subpart G. Suppliers shall be required to provide DPC access to their facilities and records for inspection and audit, as required, to determine compliance with provisions of the purchase order. These requirements shall extend to lower tier procurements, as determined by DPC management.
5. Purchase requisitions shall be reviewed by the Quality Assurance Department to assure that all necessary quality requirements are included or referenced.
6. Formal purchase orders that have been prepared from the purchase requisition shall be reviewed to assure all required information is correctly incorporated.
7. Changes in technical content in procurement documents shall be initiated and reviewed in accordance with the same procedures utilized in preparation of the original document.

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C. Requirements

1. Detailed instruction for possession-only operation of the plant and ISFSI activities shall be contained in procedures and checklists covering the following activities:
 - a. administrative control,
 - b. general system operation,
 - c. startup, operation, and shutdown of systems,
 - d. correction of abnormal, off-normal, or alarm conditions,
 - e. control of emergencies and other significant events,
 - f. radioactivity control,
 - g. chemical and radiochemical control,
 - h. Security Plan implementation,
 - i. quality assurance,
 - j. fuel handling,
 - k. surveillance and test activities of equipment,
 - l. Emergency Plan implementation,
 - m. Fire Protection Program implementation,
 - n. Process Control Program implementation,
 - o. Offsite Dose Calculation Manual implementation, or
 - p. any other procedures required by Regulatory Guide 1.33, Revision 2, for a possession-only condition.
2. For activities other than those within normal craft expertise, instructions for maintenance and repair shall be contained in procedures. These procedures shall contain instructions for preparation, performance, testing, and return to service. The procedures may reference manufacturer's instruction manuals, drawings, and other sources, as applicable.

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3. Instructions, procedures, or drawings shall delineate methods and sequences when an activity is to be performed. These documents shall include appropriate quantitative or qualitative acceptance criteria for determining that the activity has been satisfactorily performed.
4. The department responsible for an activity shall be required to provide the necessary internal review and approval of instructions, procedures, or drawings prior to performing the activity.
5. Changes to or deviations from established instructions, procedures, or drawings will require the same review and approval as the original document. However, temporary changes to procedures that do not change the intent of the original procedure may be made in ink, dated, and approved by two people of the management staff. Such changes shall be documented and reviewed by the ORC and approved by the Assistant Plant Manager as applicable within 30 days of implementation.
6. Applicable sections of the appropriate procedures shall be followed in the review, processing of changes or deviations, filing, and distribution of procedures, drawings, and specifications.
7. Procedures will be reviewed periodically as set forth in administrative procedures.

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	DOCUMENT CONTROL	
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3. Drawings, specifications, and procedures, including revisions, shall be reviewed for adequacy and approved for release by authorized personnel. The required reviews and approvals shall be specified in a document control procedure.
4. The Administrative Staff shall assure that current documents are distributed to and used at the location where the prescribed activity is performed. Documents and revisions shall be distributed as specified in a document control procedure. Preliminary and superseded documents shall be clearly identified and closely controlled to preclude their misuse.
5. An index of each type of document shall be established and maintained to provide the current status of documents.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION VII	REV. NO. 24
	CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES	
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D. Source Inspection

1. When appropriate, suppliers shall be requested to furnish DPC with sufficient information concerning their manufacturing and inspection plan to permit DPC or their designated agent to plan and implement a source inspection plan.
2. When appropriate, inspection plans shall include witness and hold points for inspection of items, witnessing of processes or tests, audit of required quality documentation, and verification that vendors have complied with the specification requirements and have documented any deviation from the specifications.

E. Receiving Inspection

1. Items shall be examined by Materials Management or appropriately trained project staff upon receipt for shipping damage, correctness of identification, and specified quality documentation, in accordance with approved instructions.
2. Documentary evidence attesting that items conform to purchase order requirements shall be available at the plant prior to installation or use of the item.
3. Documentary evidence shall be sufficient to identify that specific requirements such as codes, standards, and specifications are met by the purchased item. This requirement shall be satisfied by having available at the plant, copies of the purchase order and appropriate documents referenced therein.
4. All QC ordered materials, parts, and components will be segregated upon receipt and will be placed in a receiving inspection hold area separate from storage facilities. After acceptance, the material will be stamped as acceptable and placed in specified spare parts storage.
5. During receiving inspection, if a nonconformance or discrepancy exists, the material shall be placed on hold and will remain in a hold status until final disposition is determined. A Corrective Action Report (CAR) shall be initiated.
6. Items dispositioned as unacceptable for use shall be rejected and removed from the controlled receiving inspection area.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION VIII	REV. NO. 24
	IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS	
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3. Specifications shall require that materials, parts, and components are identified in accordance with purchase order numbers and shall require that documentation have identification providing traceability to the item.
4. Physical identification by purchase order number shall be used to the maximum extent possible for relating an item at any time to applicable documentation. Identification shall be either on the item or records traceable to the item. Where physical identification is impractical, physical separation, procedural control, or other appropriate means shall be employed.

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with the requirements of applicable codes and standards.

2. Welders and welding procedures shall be qualified, as appropriate, in accordance with Section IX of the ASME Boiler and Pressure Vessel Code and/or AWS D1.1 American Welding Society Structural Welding Code. Records of the test results obtained in welding procedures and welder performance qualifications and a listing of qualified personnel and procedures shall be maintained.
3. Non-destructive examination personnel shall be qualified in accordance with the American Society for Non-destructive Testing Standard SNT-TC-1A. Records of training, test results, and a listing of qualified personnel shall be maintained.
4. Plant procedures shall be established to describe the requirements for qualification of personnel and procedures.
5. Procedures shall be established to describe the method used to control the receipt, storage, baking, drying, and disbursal of welding filler metals.
6. Equipment used for accomplishing special processes shall be calibrated, maintained, stored, handled, and issued in accordance with applicable procedures.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION X	REV. NO. 24
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appropriate procedures or specifications. The inspection shall be documented to indicate approval and release prior to continuation of the activity.

3. Inspection requirements shall apply to all activities whether performed by company personnel or contractor personnel, and shall require that inspection procedures and instructions, along with necessary drawings, are provided prior to commencing inspection activities
4. Inspection requirements governing modifications, repairs, and replacement shall be in accordance with the original design and inspection requirements or as amended by approved changes to the original design.

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6. The Safety Review Committee is responsible for reviewing 50.59 evaluations to verify that such tests did not require a license amendment, and for reviewing proposed test activities that involve a License Amendment Request, prior to submittal to the NRC.

C. Requirements

1. A program shall be established to assure all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and documented.
2. Testing shall be performed in accordance with approved test procedures that incorporate or reference the requirements and acceptance criteria contained in applicable design documents and Technical Specifications.
3. Test procedures shall incorporate, but not be limited to, requirements for such items as: hold points, witness points, caution notes, emergency requirements, and test jumper logs.
4. Test procedures shall include, as a minimum, provisions for assuring that:
 - a. Prerequisites have been completed that include, as a minimum:
 - 1) Control of systems status as necessary.
 - 2) Availability of calibrated instrumentation and special equipment.
 - b. Test objectives and applicable acceptance limits are stated.
 - c. Test results are documented.
 - d. Detailed instructions for performing the test are included.
 - e. Test results are reviewed and approved.
5. Test reports shall include identification of the inspector, individual conducting the test, the data recorder, the type of observation made, the equipment used, the test results, the acceptability of the test results, and approved disposition for any deviations.

Test results which fail to meet the requirements and acceptance criteria shall be properly noted and appropriate corrective action taken.

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	CONTROL OF MEASURING AND TEST EQUIPMENT	
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2. To assure equipment accuracy, inspection, measuring, and test equipment shall be controlled, calibrated, adjusted, and maintained periodically, or prior to use. Calibrations are performed against certified measurement standards that are traceable to nationally recognized standards. Where national standards do not exist, provisions will be established to document the basis for calibration. Control measures and procedures shall prevent the use of calibrated tools, gauges, instruments, and other measuring and test equipment by unauthorized personnel. Special calibration and control measures are not required for devices when normal commercial practices provide adequate accuracy.
3. When an item of measuring and test equipment is found to be out of calibration, an investigation will be conducted and documented to determine the validity of previous inspections, tests, or calibrations which were performed with the use of that item.
4. Records or logs of the calibration history of measuring and test equipment shall be maintained.
5. Measuring and test equipment shall be controlled by a permanently affixed serial number. Calibration decals, tags or stickers shall be displayed prominently on each device and shall reflect the date of calibration, due date of the next calibration (for recurring calibration) and identity of person performing the calibration.

DAIRYLAND POWER COOPERATIVE LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION	SECTION XIII	REV. NO. 24
	HANDLING, STORAGE AND SHIPPING	
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5. Special handling tools and equipment will be inspected and tested in accordance with approved procedures, at specified intervals, to verify that tools and equipment are adequately maintained.
6. Materials and equipment will normally be handled by materials handling personnel. Fuel and other special shipments which require special equipment and handling will be handled by others knowledgeable and/or specially trained personnel. The proper use of fuel handling equipment will be described in fuel handling procedures.
7. Storage of material and equipment will be in areas free from fumes, vapors, and dust. Storage will be in areas protected from the weather, as appropriate, and in which chemical storage is excluded, except as may be specifically authorized in writing. Storage will be in areas which satisfy the handling and storage requirements specified for the item.

<p>DAIRYLAND POWER COOPERATIVE</p> <p>LACBWR</p> <p>QUALITY ASSURANCE PROGRAM DESCRIPTION</p>	<p>SECTION XIV REV. NO. 24</p> <p>INSPECTION, TEST, AND OPERATING STATUS</p> <p>DATE 12/28/11 PAGE 1 OF 2</p>
<p>REV'D: <u><i>[Signature]</i></u> <u>1/6/12</u> Manager, QA Date</p> <p>REV'D: <u><i>[Signature]</i></u> <u>1/6/12</u> Plant Manager Date</p>	<p>APPROVED:</p> <p><u><i>William L Berg</i></u> <u>Jan 10, 2012</u> President & CEO Date</p>

XIV. INSPECTION, TEST, AND OPERATING STATUS

A. General

This section of the manual describes the system for indicating the inspection, test, and operating status of components and systems.

B. Responsibilities

1. The LACBWR staff is responsible for ensuring that the status of operating equipment or systems to be removed from service for maintenance, test, inspection, repair, or modification is in accordance with the approved LACBWR procedures. The LACBWR staff is also responsible for the control of facility status during modifications to the plant.
2. The QA Department shall monitor the status of activities for compliance with approved procedures and shall ensure inspection results are properly logged. They shall establish the procedures for implementing the work inspection or status sheets during maintenance, repair, and modifications and shall ensure inspection results are properly logged.

C. Requirements

1. Equipment or systems not ready for normal service shall be clearly identified by use of tags, an equipment status board, and the Control Room Log Book to indicate their status.
2. Equipment or system inspection and test status shall be indicated by use of a yellow "Special Information" Tag or Control Room Log Book.
3. Structures, systems, and components that are found to be unacceptable during or after testing shall be clearly identified in the Shift Supervisor's Log Book or on the Test Data Sheets.

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4. Operations involving handling of fuel assemblies or other radioactive sources shall be identified and controlled by the use of tags, control log sheets, or other suitable means.
5. Maintenance, repair, or modification of plant components, systems, or structures will utilize a test sheet or Shift Supervisor log entry to indicate its acceptance or rejection for a particular component, system, or structure.
6. Maintenance Requests and/or Work Orders shall be used to originate, approve, authorize, and document all non-routine maintenance or repair work performed at the plant.

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	NONCONFORMING MATERIALS, PARTS, OR COMPONENTS	
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3. Deficiencies which cannot be corrected by the vendor shall be reviewed by the LACBWR staff. The LACBWR staff will recommend repair, rework, accept, or reject. Items shall be repaired or reworked only in accordance with approved procedures and shall be re-inspected after repair by the QA Department. LACBWR staff shall ensure that documented and approved procedures are available prior to repair or rework. The QA Department shall re-inspect all repaired or reworked items.

Items which are accepted for use with a known deficiency shall be fully documented with the specification requirement, justification for acceptance, and effect of such use. All such items shall be approved by the Assistant Plant Manager prior to use.

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3. Nonconforming materials, parts, or components shall be identified by a CAR which shall be initiated and processed whenever the actual condition is not in accordance with drawings or specifications. Corrective action is an integral part of the nonconforming control system.
4. The Maintenance Request process can create documented CARs.
5. Quality Assurance Department shall audit corrective actions to assure that the cause of the condition has been determined and that corrective action has been taken in accordance with recommendations.

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2. An approved document listing will be reviewed on a regular basis to verify that the record file contains the latest revisions of all required documents.
3. A system will be established to control the issuance and return of all records.

E. Record Retention

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

1. The following records shall be retained for at least five years:
 - a. Records and logs of facility operation.
 - b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.
 - c. All REPORTABLE EVENTS submitted to the Commission.
 - d. Records of surveillance activities, inspections, and calibrations required by the QAPD.
 - e. Records of changes made to the procedures required by Section V of the QAPD.
 - f. Records of radioactive shipments.
 - g. Records of sealed source and fission detector leak tests and results.
 - h. Records of annual physical inventory of all sealed source material of record.
 - i. QA Audits.
2. The following records shall be retained for the duration of the LACBWR License:
 - a. Facility design modification packages and work order packages.
 - b. Records of new and irradiated fuel inventory, fuel transfers and assembly burn-up histories.

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- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs, and records of analyses required by the Radiological Environmental Monitoring Program.
- e. Records of reactor tests and experiments.
- f. Records of training and qualification for current members of the facility staff.
- g. Records of in-service inspections performed pursuant to Technical Specifications.
- h. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59 and 10 CFR 72.48.
- i. Records of meetings of the ORC and the SRC.
- j. Records of decommissioning and/or dismantlement of the facility.

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4. Audit results shall be documented and reported to the supervision having responsibility in the area audited.
5. Quality Assurance Auditors shall assess the following:
 - a. evaluation of quality assurance practices, procedures, and instructions;
 - b. effectiveness of implementation; and
 - c. conformance with approved procedures.
6. A system of planned and scheduled audits shall be generated. All planned and scheduled audits shall be performed within their schedule interval and shall include, at a minimum, the following areas:
 - a. The conformance of facility operation to provisions contained within the Appendix "A" Technical Specifications and applicable license conditions at least once per 24 months.
 - b. The performance, training and qualifications of the entire facility staff at least once per 24 months.
 - c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 12 months.
 - d. The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
 - e. The Emergency Plan and implementing procedures at least once per 12 months.
 - f. The Contingency Plan, the Security Plan and implementing procedures, at least once per 12 months.
 - g. The Fire Protection Program and implementing procedures at least once per 24 months.
 - h. A fire protection and loss prevention inspection and audit shall be performed at least once per 24 months.
 - i. The ODCM and Radiological Environmental Monitoring Program and results at least once per 12 months.

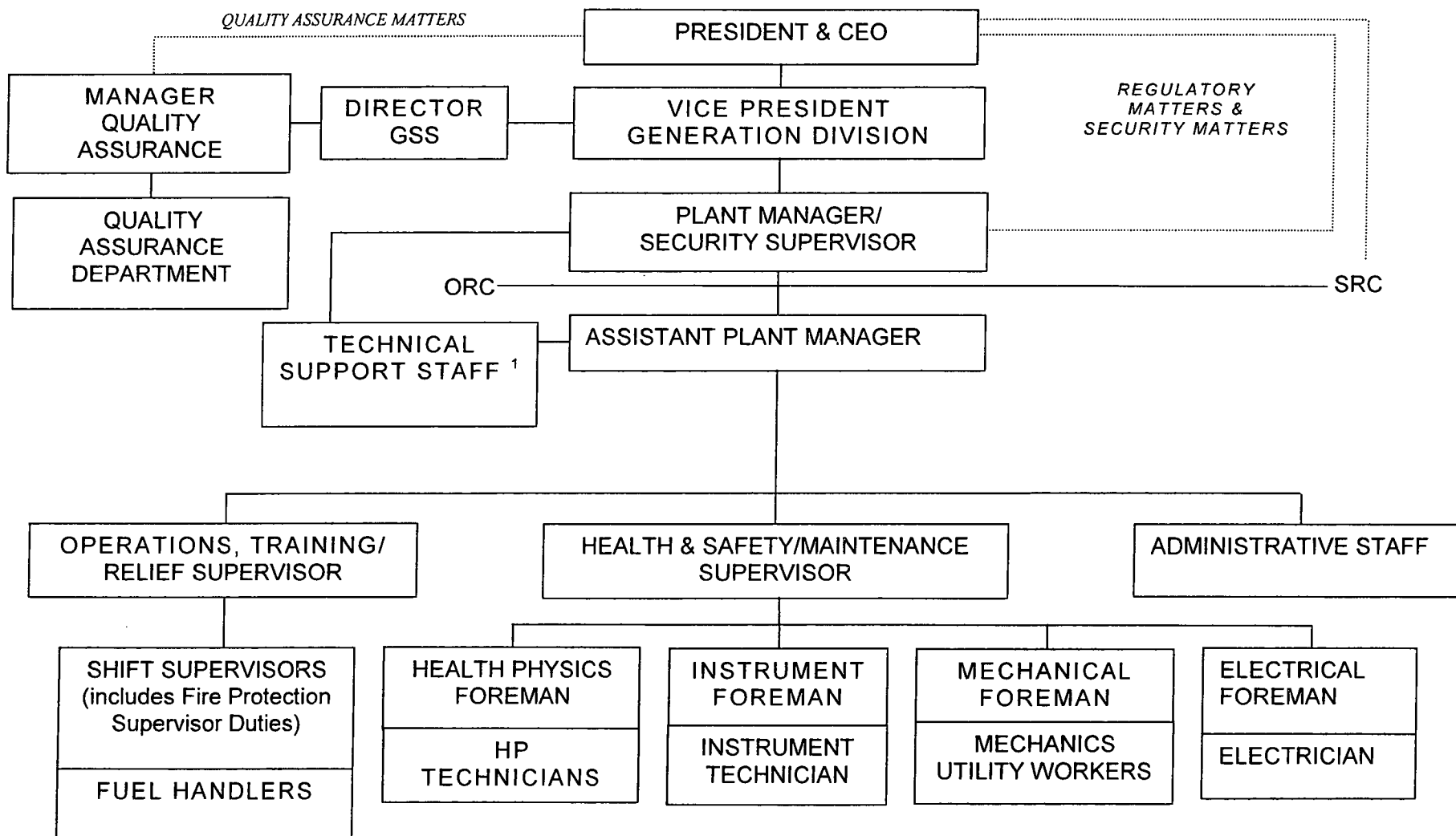
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- j. The Radiation Protection Program and the Process Control Program, and implementing procedures, at least once per 12 months.
 - k. Any other area of facility operation considered appropriate by the SRC or the President & CEO.
7. In addition, audits shall be conducted on an unscheduled basis, when one or more of the following conditions exist:
- a. When significant changes are made in functional areas of the Quality Assurance Program, including significant reorganizations and procedural revisions.
 - b. When it is suspected that safety, performance, or reliability of an item is questionable due to deficiencies or nonconformances in the Quality Assurance Program.
 - c. When a systematic, independent assessment of program effectiveness or item quality, or both, is considered necessary.
 - d. When it is considered necessary to verify the implementation of required corrective actions.
8. Deficiencies or nonconformances identified during an audit shall be documented and brought to the attention of the Plant Manager for project related issues and the Assistant Plant manager for plant related issues. Follow-up shall be performed to verify that corrective actions have been taken to correct the deficiencies or nonconformances.
9. Audit reports are sent to DPC management for their review and assessment of the QA Program.
10. Audit reports shall be forwarded to the President & CEO, and to the management positions responsible for the areas audited, within 30 days after completion of the audit.

TABLE 1

LACBWR QUALITY ASSURANCE PROGRAM (SECTION)	REGULATORY GUIDE 1.33		
	IMPLEMENTING PROCEDURES	ANSI 18.7 (SECTION)	10 CFR 50 APPENDIX B (SECTION)
0.0 INTRODUCTION			
I. ORGANIZATION	ACP-02.01, ACP-03.01	1, 3.1, 3.2, 3.4.2	I
II. QUALITY ASSURANCE PROGRAM	ACP-03.01, QAI-1	3.1, 3.2, 3.3, 3.4.2, 5.1, 5.2	II
III. DESIGN CONTROL AND REVIEW	ACP-03.03, ACP-04.1, , ACP-04.03, ACP-07.03	5.2.7.2	III
IV. PROCUREMENT DOCUMENT CONTROL	ACP-05.01	5.2.13.1	IV, V, VI
V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS	LACBWR OPERATING MANUAL, ACP-06.01, ACP-06.02, ACP-06.06, ECP-02	5.2.7, 5.3	V
VI. DOCUMENT CONTROL	ACP-06.01, 06.03, 07.01, 07.03, 07.07, ECP-2, QAI-2,	5.2.15	VI
VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES	ACP-05.0, ACP-11.01	5.2.13.2	VII, VIII
VIII. IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, & COMPONENTS	ACP-09.01, ACP-30.01	5.2.13.3	VIII
IX. CONTROL OF SPECIAL PROCESSES	ACP-10.01, ACP-10.03	5.2.12, 5.2.18	IX
X. INSPECTION	ACP-11.01	5.2.17	X
XI. TEST CONTROL	ACP-12.01	5.2.19	XI
XII. CONTROL OF MEASURING AND TEST EQUIPMENT	ACP-13.01	5.2.16	XII
XIII. HANDLING, STORAGE, & SHIPPING	ACP-30.01, IQI-2	5.2.13.4	XIII
XIV. INSPECTION, TEST AND OPERATING STATUS	ACP-02.03, ACP-11.01, ACP-12.01, ACP-15.01, ACP-15.02	5.2.6, 5.2.14	XIV
XV. NONCONFORMING MATERIALS, PARTS, OR COMPONENTS	ACP-16.0	5.2.14	XV
XVI. CORRECTIVE ACTION	ACP-16.0, ACP-17.01, 17.02, 17.03, 17.04	5.2.11	XVI
XVII. QUALITY ASSURANCE RECORDS	ACP-18.01	5.2.12	XVII
XVIII. AUDITS	ACP-03.01	4.5	XVIII

Figure 1



¹ Off-Site Engineering, Technical Support Engineer(s), Reactor Engineer/Radiation Protection Engineer *, Project Manager
(*Duties to be performed with assistance of qualified consultants when necessary.)

FIGURE 2

DAIRYLAND POWER COOPERATIVE
MANAGEMENT ORGANIZATION

