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SUBJECT: Forwards addl info to suppl 930510 application for amend to
 License NPF-21,changing TS Section 6.0, "Administrative
 Controls," to clarify commitments re FSAR & NUREG-0737
 covering proposed realignment of QA organization.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

May 21, 1993
GO2-93-118

Docket No. 50-397

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

Gentlemen:

Subject: WNP-2 OPERATING LICENSE NPF-21 SUPPLEMENTAL INFORMATION,
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 6.0,
ADMINISTRATIVE CONTROLS, SUPPLEMENTAL INFORMATION

Reference: Letter GO2-93-107 dated May 10, 1993, J. V. Parrish (Supply System) to NRC,
Same Subject

As requested by Mr. J. W. Clifford on May 11, 1993, additional details are provided to supplement information presented in the referenced letter. The additional information clarifies how the commitments, relative to the ISEG, in the WNP-2 Final Safety Analysis Report (FSAR) and NUREG-0737 are satisfied in the proposed realignment of the Quality Assurance organization.

The attachment contains NUREG-0737 guidance and reference to specific commitments within Appendix B of the WNP-2 FSAR. Companion provisions within the WNP-2 Technical Specifications, and specific information on how our commitments are satisfied, are then presented.

We trust this additional information provides the details needed to complete your review.

Sincerely,

J. V. Parrish

Assistant Managing Director, Operations (Mail Drop 1023)

Attachment

cc: W Bishop, EFSEC (T-146)
JW Clifford, NRC
NS Reynolds, Winston & Strawn

JB Martin, NRC RV
NRC Site Inspector (901A)
DL Williams, BPA (399)

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ATTACHMENT

"The principal function of the ISEG is to examine plant operating characteristics, NRC issuances, Licensing Information Service advisories, and other appropriate sources of plant design and operating experience information that may indicate areas for improving plant safety." (FSAR I.B.1.2 and NUREG-0737, I, B.1.2 position).

"The NSAD shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety." (T.S. 6.2.3.1)

Currently, these functions are performed by the Operating Experience Review (OER) function which is a portion of the Nuclear Safety Engineering organization within the Nuclear Safety Assurance Division (NSAD). Four technical staff perform this function. Under the proposed realignment, these functions will continue to be performed by the same staff. They will report directly to the Quality Support division manager. The only change is that this function will report to a higher management level under the proposed realignment.

"Where useful improvements can be achieved, it is expected that this group will develop and present detailed recommendations to corporate management for such things as revised procedures or equipment modifications." (FSAR I.B.1.2 and NUREG-0737, I.B.1.2, position)

"The NSAD shall make detailed recommendations for revised procedures, equipment, and modifications, maintenance activities, operations activities, or other means of improving unit safety to the Director of Quality Assurance." (T.S. 6.2.3.1)

The OER staff reviews industry events and other information for applicability to WNP-2 operation and develops recommendations involving revised procedures, equipment modifications, etc to improve WNP-2 nuclear safety. Management commitment to the recommendations is obtained and actions are tracked to completion. This function will continue to be performed in the same manner in the proposed realignment.

"The ISEG is to perform independent review and audits of plant activities including maintenance activities, modifications, operational problems, and operational analysis, and aid in the establishment of programmatic requirements for plant activities." (FSAR I.B.1.2 and NUREG-0737, I.B.1.2 position)

"Another function of the ISEG is to maintain surveillance of plant operations and maintenance activities to provide independent verification that these activities are performed correctly and that human errors are reduced as far as practicable. ISEG will then be in a position to advise utility management on the overall quality and safety of operations." (FSAR I.B.1.2 and NUREG-0737, I.B.1.2 position)

"The NSAD shall be responsible for maintaining surveillance of unit activities to provide independent verification that these activities are performed correctly and human errors are reduced as much as practical." (T.S. 6.2.3.3)

These requirements are currently being performed by five technical staff within the NSAD who perform and lead technical assessments for the Nuclear Safety Engineering (NSE) organization. However, this function is also a responsibility of technical staff within the current Plant Quality Assurance organization (QA surveillances) and technical staff within the Programs and Audits organization (QA audits). The technical assessments performed by NSAD staff are performance-based. The surveillance and audit functions have become increasingly more performance-based over the past several years with increased technical capabilities of the staff and a performance-based focus within these QA organizations. To properly perform these functions in a cost effective, complete manner, it has become necessary to coordinate the activities of the three groups. Currently, they operate to a joint quarterly schedule. Activities covered in depth by NSE are credited by the QA organization and duplicate review is minimized. NSE reviews QA activities and likewise plans their reviews to avoid duplication. Personnel in all three groups are tasked with the responsibility to provide independent verification that activities are performed correctly and human errors are reduced. A key expectation for personnel in all three groups is to advise management on the overall quality and safety of operations of WNP-2.

The above requirement will continue to be satisfied under the proposed organizational realignment. This will be completed by three departments within the Quality Assessments division. Functional area engineers (FAEs) within these departments will be responsible for performing audits, surveillances or technical assessments within their assigned functional area. Fourteen functional areas have been established which include operations, maintenance, engineering, fuels, testing, training/qualifications, radiological programs, licensing and support programs and others. Nine staff positions are in NSE now. The proposed realignment will move the five staff members responsible for assessments into the Quality Assessment division. The combined staff positions responsible for assessments does not change in this realignment (five NSE, plus five QA Programs and Audits, plus nine Plant QA = 19 QA Assessment engineer staff positions).

OER personnel, along with industry peers or plant personnel, have often been involved in performing technical assessments. This practice will continue. Additionally, the OER reviews have often sent issues to the Quality organization for assessment, and this will continue.

"Rather, it is an additional independent group of a minimum of five dedicated, full-time engineers, located on site, but reporting offsite to a corporate official who holds a high level, technically-oriented position that is not in the management chain for power production. The ISEG will increase the available technical expertise located on site and will provide continuing, systematic, and independent assessment of plant activities." FSAR I.B.1.2 and NUREG-0737, I.B.1.2 clarification)

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"The NSAD shall be composed of at least five, dedicated, full-time engineers, with a minimum of three located on site. Each shall have a bachelor's degree in engineering or related science or qualifications meeting ANS 3.1 Draft Revision dated March 13, 1981, Section 4.2 or 4.4 or equivalent, as described in Section 4.1 and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field." (T.S. 6.2.3.2)

As stated above, the OER staff currently consists of four dedicated technical staff. All four currently report to the Nuclear Safety Engineering organization within the Nuclear Safety Assurance division. This same staff of four will report directly to the Quality Support division manager. The 19 technical staff within the Quality Assessments division will be performing assessments within the various functional areas described above. Individuals who perform ISEG assessment functions within the Quality Assessment technical staff will meet the Technical Specification qualification requirements. These assessments will be the same or better quality as that currently being performed by the Nuclear Safety Engineering organization. Performance-based surveillances and audits will also be performed by the Quality Assessments organization. The Quality Assessments division will satisfy the role of the utility independent review and audit group. All Quality Assessments division personnel are located on-site. They will report through a Quality Assessments manager who reports to the Director of Quality Assurance. The Director, Quality Assurance, is a corporate official that holds a high level, technically oriented position that is not in the management chain for power production. While he is located on-site, this is considered appropriate for a single operating nuclear unit organization.

Quarterly planning sessions are currently performed to determine specific areas for independent assessment of plant activities. This will be continued under the proposed organizational alignment. The quarterly assessment plan, produced as a result of these activities, will contain information that clearly indicates specific staff who will be performing the ISEG type of independent assessment activities. The four OER staff members are dedicated full-time to ISEG activities. Administrative controls within the Quality Assurance directorate will ensure there is at least an equivalent of one additional full-time staff member performing the ISEG activities meeting the above qualifications.

"It is expected that the ISEG may interface with the quality assurance (QA) organization, but preferably should not be an integral part of the QA organization." (FSAR I.B.1.2 and NUREG-0737, I.B.1.2 clarification)

Since the time NUREG-0737 was written, the Quality Assurance organization has improved its assessment approach to become more performance based. Personnel have become more technically competent and specialists are utilized as needed. The Quality Assurance organization's scope of review encompasses all the areas an ISEG is expected to assess. Both groups are responsible for verification, as well as recommending actions for improvement of safety and operational performance.

The Nuclear Safety Engineering organization performing the ISEG functions is currently contained within the Quality Assurance directorate. This will continue with the proposed realignment of the Quality Assurance organization. It has been, and continues to be, the position of the Supply System that performance of ISEG functions within the Quality Assurance directorate does not lessen the effectiveness of these functions from those contemplated by NUREG-0737. Our position is that the ISEG type of functions are effectively performed under the current organization and that these functions will be performed even more effectively within the new organization. The distinction between ISEG and QA Assessment activities is no longer needed. Maintaining separate organizational units with essentially the same function (assessment) can lead to duplicate work and unnecessary costs.

"The functions of the ISEG (NSAD) require daily contact with the operating personnel and continued access to plant facilities and records." (FSAR I.B.1.2 and NUREG-0737, I.B.1.2 clarification)

Staff performing the ISEG and Quality Assurance functions are currently located at the WNP-2 site. They have ready access to the operating personnel, including all plant facilities and records. This will continue with the proposed realignment as the Quality Assessment division.

"Records of activities performed by the NSAD shall be prepared, maintained, and forwarded each calendar month to the Director of Quality Assurance." (T.S. 6.2.3.4).

Current reporting of ISEG activities will continue with the proposed realignment. Audit, surveillance and technical assessment reports will be prepared by the Quality Assessment organizations. Industry event evaluation reports, including corrective action recommendations, will be prepared by the OER staff. Monthly reports presenting a summary record of these activities will be developed for transmittal to the Director, Quality Assurance.

The above assessment reports will also be distributed to a number of senior and middle management for their review. In addition, the audit, surveillance and technical assessment reports will be transmitted to the CNSRB for their review.

Also, the Quality Assurance directorate currently develops an Annual Report which is presented to Supply System senior management. This report provides a summary performance assessment based on the results of internal quality verification and safety assessment efforts, analysis of plant and industry events, evaluation of performance indicators, trend data and reviews by external groups. The data for this summary performance assessment comes from both NSAD (ISEG) and QA organizations. Its main purpose is to identify areas for management attention that will lead to improved future performance and have not been identified or resolved previously. This report is also presented to the Corporate Nuclear Safety Review Board (CNSRB) and the NRC for their review. Issuance of this report will continue following implementation of the proposed realignment.