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SUBJECT: Requests NRC approval of rev to operational QA program description for supply sys WNP-2.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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October 21, 1994
GO2-94-243

Docket No. 50-397

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

Gentlemen:

Subject: **REVISION TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM
DESCRIPTION (WPPSS-QA-004), RELATED TO ANSI N18.7-1976**

The Washington Public Power Supply System requests NRC approval, in accordance with 10CFR50.54(a)(3), of the attached revision to the Operational Quality Assurance Program Description (OQAPD) for the Supply System's Washington Nuclear Project 2 (WNP-2). The OQAPD is referenced in Chapter 17 of the Final Safety Analysis Report and was submitted under separate cover to the NRC as Topical Report WPPSS-QA-004. The proposed revision modifies a commitment to ANSIN18.7-1976/ANS-3.2, Section 5.2.15, concerning the frequency of procedure reviews. The Supply System proposes to perform the biennial review requirement by utilizing the existing dynamic review process, and adopting a plant procedure review process previously approved by the NRC for similar QA Program revisions at other plants, (i.e.: Diablo Canyon, Fort Calhoun). This revision constitutes a reduction to a previous OQAPD commitment and, therefore, NRC approval is required prior to implementation. The provisions of 10CFR50 Appendix B will continue to be met by incorporation of this revision.

A description and justification for the subject revision to the OQAPD are provided under Attachment I of this proposal. Attachment II includes marked-up changes to the affected OQAPD Appendices.

Pursuant to the requirements of 10CFR50.54(a)(3)(iv), should no comments be received from the NRC within sixty days after submittal of this proposed change, the Supply System will consider the revision accepted by the Commission and it will be implemented accordingly.

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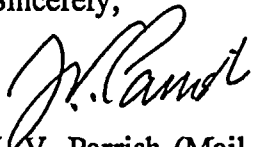
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**REVISION TO THE OPERATIONAL QUALITY ASSURANCE PROGRAM
DESCRIPTION (WPPSS-QA-004), RELATED TO ANSI N18.7-1976**

Should you have any questions or desire additional information regarding this matter, please call me or Mr. D. A. Swank at (509) 377-4563.

Sincerely,



J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations

DAK/ml
Attachments

cc: LJ Callan - NRC RIV
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ATTACHMENT I

DESCRIPTION OF CHANGE

The Supply System has committed through the WNP-2 Operational Quality Assurance Program Description to ANSI N18.7-1976/ANS-3.2 and endorses the regulatory position as contained in USNRC Regulatory Guide 1.33, Revision 2 (February 1978). Section 5.2.15 of the ANSI Standard requires plant procedures be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable. A revision of a procedure constitutes a procedure review.

The Supply System proposes to revise the commitment to Section 5.2.15 of ANSI 18.7 by replacing the biennial review requirement with an alternative which provides for periodic plant procedure reviews as follows:

Non-routine plant procedures, which may include emergency operating procedures, emergency support procedures, abnormal operating procedures (including annunciator response procedures), and emergency plan implementing procedures, shall be reviewed at least every two years and revised as appropriate.

Plant procedures which are used at least once every two years may be reviewed as described below in lieu of a biennial review. The review can be accomplished in several ways, including (but not necessarily limited to): complete use of the procedure, or detailed scrutiny of the procedure as part of a documented training program, drill, simulator exercise, or other such activity.

Plant procedures that are considered routine but have not been used for two years, shall be reviewed before use to determine if changes are necessary.

This alternative to the existing biennial procedure review requirement shall be supported by a Quality Assurance audit of a representative sample of routine plant procedures that are used more frequently than every two years. The audit shall be conducted at least every two years to ensure the acceptability of the procedures, and to verify the procedure review and revision program is being implemented effectively.

By implementing this alternative review process, the Supply System will better allocate resources and focus manpower while providing a more efficient procedure review process. The savings in man-hours from duplicative efforts of the current biennial review, along with the associated expenditures, could then be reapportioned to strengthen other areas of plant operation.

JUSTIFICATION FOR CHANGE

The current procedure review and revision process at WNP-2 is a dynamic review process based on the internal identification and/or external receipt of new or revised source material. The need for procedure changes may be identified through a number of sources and at various intervals throughout the operational life of the plant. Evaluation and implementation of proposed changes to plant procedures should occur upon identification of the need for such changes, rather than at a set review period. Programs were developed by the Supply System and are in-place at WNP-2 that determine if procedure revisions are required and when such changes are to be implemented. These programs serve to facilitate the timely review of station procedures while ensuring both their accuracy and up-to-date status. Some examples of this dynamic review process used by the Supply System to identify the need for revisions to plant procedures include:

- Use of Controlled Plant Procedures

It is management's expectations that plant personnel strictly adhere to procedures. Should a procedure be incorrect or if plant conditions do not support its use, supervision is alerted, the work activity stopped if necessary, and changes implemented as necessary. Such changes receive 10CFR50.59 reviews and/or safety evaluations, as necessary, along with cross discipline review and review from organizations impacted by the revision. Processing deviations and revisions to procedures includes SRO, Plant Operations Committee and Plant Manager review, as appropriate. It may also include verification and validation. [Functional Manual for Nuclear Operation, NOS-9, "Procedures/Instructions Control", and Plant Procedures Manual Nos. 1.2.3, "Use of Controlled Plant Procedures", and 1.2.4, "Plant Procedure Approval, Revision and Distribution".]

- Technical Specification Surveillance Testing

Surveillance testing results found to be outside those designated in the procedure or abnormal circumstances preventing completion of the procedure are reported for evaluation, and the potential for procedure changes evaluated. [Plant Procedures Manual 1.5.1, "Technical Specification Surveillance Testing Program".]

- Plant Modifications

Quality related plant modifications have Plant Operations Committee (members appointed from WNP-2 Senior Managerial/Technical Staff), and other appropriate multidisciplined reviews performed. Based on these reviews a Plant Procedure Revision list is generated identifying each affected procedure and whether revisions are required prior to operability. Procedures impacted by the modification are revised prior to declaring operability or in conjunction with closeout of the modification. [Functional Manual for Nuclear Operation, NOS-23, "Plant Modification Control", and Plant Procedures Manual 1.4.1, "Plant Modifications".]

- Control of Nonconformances and Corrective Action

This program provides for the determination and correction of items adverse to quality. The process includes review and revision of plant procedures related to Problem Evaluation Requests, Root Cause Analysis, Human Performance Enhancement System Program, Incident Review Board and other mechanisms that serve to identify and/or investigate plant problems. This program ensures a review of affected procedures following an unusual incident, such as an accident, an unexpected transient, significant personnel error or equipment malfunction. [Functional Manual for Nuclear Operation, NOS-30, "Control of Nonconformances and Corrective Action", and Plant Procedures Manual Nos. 1.1.8, "Incident Review Board", 1.3.12A, "Processing of Problem Evaluation Requests (PER)", 1.3.45, "Human Performance Enhancement System Program", 1.3.48, "Root Cause Analysis".]

- External Operational Experience Review

This program ensures that industry-wide events are reviewed and where applicable, used to improve WNP-2 practices, procedures and equipment. Information assessed may include INPO Significant Operating Experience Reports and Significant Event Reports; NRC Bulletins and Information Notices; NSSS (GE) Information Letters; Letters from the Architect Engineers, Contractors, Equipment Manufacturers, or Vendors affecting station equipment, parts, services, training or analyses performed, and notification of 10CFR Part 21 or potential 10CFR Part 21 defects; and BWROG and NUMARC recommendations for operation, maintenance, or modifications that are related to nuclear safety or plant reliability. [Functional Manual for Nuclear Operation, NOS-14, "Operating Experience Review", and Plant Procedures Manual 1.10.4, "External Operational Experience Review".]

- Vendors' Operating and Maintenance Manuals

WNP-2 has established a vendor submittal program for receipt, distribution, review and approval of vendor supplied information (i.e., Operations and Maintenance Manuals, procedures, drawings, calculations, test reports, etc.). This information is evaluated for applicability and potential affect on plant systems and equipment, per the recommendations of Generic Letters 83-28 and 90-03. [Functional Manual for Nuclear Operation, NOS-32, "Configuration Management", and Plant Procedures Manual Nos. 1.6.3, "Vendors Operating and Maintenance Manuals", and 1.6.8, "WNP-2 Vendor Submittals".]

- Technical Specification, FSAR, ODCM Change Control Process

The process for preparing, submitting and receiving proposed changes to the WNP-2 Operating License, including the Technical Specifications, provides for the identification of revisions to procedures, training and equipment required to implement the license

change. [Functional Manual for Nuclear Operation, NOS-11, "Conduct of Licensing Activities", and Plant Procedures Manual 1.4.5, "Tech Spec FSAR and ODCM Change Control Process".]

- Revision of Master Data Sheets and Setpoints

The process for preparation, review and approval of setpoint changes or other general Master Data Sheet changes at WNP-2 requires identification and evaluation of affected procedures such as Surveillance, Annunciator and/or other instrumentation procedures. [Functional Manual for Nuclear Operation, NOS-23, "Plant Modification Control", and Plant Procedures Manual 1.4.3, "Revision of Master Data Sheets and Setpoints".]

- Conduct of Infrequently Performed Tests or Evolutions

The program established at WNP-2 for infrequently performed tests or evolutions provides for increased procedure scrutiny as to level of detail, review, predicted abnormal and expected plant response, lessons learned, necessary communication, planning, and management expectations and oversight during performance of the procedure. These measures ensure adequate control and implementation of procedures used for infrequently performed tests or evolutions and provide the potential to revise procedures prior to, during and after performance of such evolutions. [INPO SOER 91-01, "Conduct of Infrequently Performed Tests or Evolutions", and Plant Procedures Manual 1.16.6C, "Conduct of Infrequently Performed Test or Evolutions".]

- Conduct of Licensing Activities

This program ensures commitments in the form of corrective actions to regulatory agency findings are identified, tracked and followed to closure. Supply System responses to NRC Generic Letters, Bulletins, Inspection Reports, Notices of Deviation/Violation, etc., which affect plant procedures are identified as to the disposition required and monitored to completion. [Functional Manual for Nuclear Operation, NOS-11, "Conduct of Licensing Activities", and Plant Procedures Manual Nos. 1.3.32, "Plant Tracking Log", 1.10.1, "Reportable Events and Occurrences Required by Regulatory Agencies", 1.10.4, "External Operational Experience Review", 1.10.7, "Industry Notification of Internal Operating Experience"]

- Review Committees

Review Committees (Corporate Nuclear Safety Review Board, Plant Operating Committee) have been established at WNP-2 for the timely, independent and continuing review of operating activities to detect and report potential unsafe conditions. Additionally, an Incident Review Board has been implemented to immediately investigate WNP-2 Plant events where human performance is suspected to be a main contributor in events that have significant impact on the Supply System. Together with the Root Cause

Analysis and Problem Evaluation Request processes, this program provides for affected procedures review and revision as necessary following an unusual incident at WNP-2. [Functional Manual for Nuclear Operation, NOS-6, and Plant Procedures Manual Nos. 1.1.8, "Incident Review Board", 1.3.12, "Problem Evaluation Request (PER)", and 1.3.48, "Root Cause Analysis".]

Additionally, the Supply System has implemented a verification and validation process for station procedures to confirm and document technical adequacy, correct wording and proper guidance to the user. This procedure upgrade program has been an ongoing effort which began in September of 1990, to ensure the proper operation and maintenance of plant equipment. The verification and validation review process will continue on an as needed basis for plant procedures.

CONCLUSION

The Supply System has developed and implemented the aforementioned processes which provide a dynamic review process for meeting the need for a systematic review of procedures as contained in ANSI N18.7-1976/ANS-3.2. The added provisions of the new procedure review process for timely reviews of routine and non-routine plant procedures along with periodic Quality Assurance audits of routine plant procedures as described above, further support this proposed alternative to the biennial review commitment. The Supply System has concluded this revision to the Operational Quality Assurance Program Description meets the requirements of ANSI N18.7-1976 and 10CFR Part 50, Appendix B, through the application of the proposed procedure review process. Continuance of the existing commitment for a separate biennial procedure review is redundant and adds no appreciable benefit beyond that of the proposed alternative. Upon NRC acceptance of this revision to the OQAPD, the existing commitment for biennial review of all plant procedures at WNP-2 will no longer be implemented. However, periodic procedural reviews will continue through the use of the various methods described above.

ATTACHMENT II

II.5. REGULATORY GUIDE 1.33, REV. 2 (February 1978) - "Quality Assurance Program Requirements (Operation)"

The Supply System will implement the Regulatory Position of Regulatory Guide 1.33, Rev. 2 (February 1978), subject to the following:

1. Regulatory Position C.2 of Regulatory Guide 1.33, Rev. 2 (February 1978) implies that the provisions contained in the latest revisions of the Regulatory Guides, listed therein, will be followed. The Supply System will follow its position statements on applicable Regulatory Guides as described throughout this Appendix.
2. Section 5.2.13.4 of ANSI N18.7-1976/ANS-3.2: The third paragraph of this section is revised to read, "Special handling tools and equipment shall be inspected and/or tested, as necessary, in accordance with written procedures and at specific times to verify that the tools and equipment are adequately maintained."
3. Section 5.2.15 of ANSI N18.7-1976/ANS-3.2: The fourth paragraph of this section is replaced with the following (the remaining text of this section is unchanged):

Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure as follows:

- Non-routine plant procedures, which may include emergency operating procedures, emergency support procedures, abnormal operating procedures (including annunciator response procedures), and emergency plan implementing procedures, shall be reviewed at least every two years and revised as appropriate.

- Plant procedures which are used at least once every two years may be reviewed as described below in lieu of a biennial review. The review can be accomplished in several ways, including (but not necessarily limited to): complete use of the procedure, or detailed scrutiny of the procedure as part of a documented training program, drill, simulator exercise; or other such activity.
 - Routine plant procedures that have not been used for two years shall be reviewed before use to determine if changes are necessary.
 - A revision of a procedure constitutes a procedure review.
4. Section 5.2.17 of ANSI N18.7-1976/ANS-3.2 states that inspection of operating activities may be conducted by second-line supervisory personnel or by other qualified personnel not assigned first-line supervisory responsibility for conduct of the work. The Supply System position is to allow the plant operations' first line supervisors to perform inspections of surveillance tests, provided that an after-the-fact review of surveillance documentation is performed by the second-line supervisor or by other personnel not assigned first-line responsibility for the conduct of the work.
5. Sections 5.2.19.1 and 5.2.19.2 of ANSI N18.7-1976/ANS-3.2 describe rules of practice for preoperational and startup test program. The Supply System intends to comply with the provisions of these sections. In cases where conflicts exist between these sections and Regulatory Guide 1.68, the Supply System will comply with the implementation of Regulatory Guide 1.68 as described in Chapter 14 "Initial Test Program" of the Final Safety Analysis Report.