

OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004)

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1 - ORGANIZATION

1.1 PURPOSE

This section provides a description of the authorities and responsibilities assigned to Supply System organizational units and individuals involved in establishing, implementing, verifying implementation, and measuring the overall effectiveness of the administrative controls and quality assurance program during the initial testing (pre-operational and startup testing) and subsequent operations phases of Supply System nuclear power plants.

1.2 SUPPLY SYSTEM ORGANIZATION

The Supply System organization responsible for establishing, implementing, verifying implementation, and measuring the overall effectiveness of the administrative controls and quality assurance program for its nuclear power plants is as depicted in Figures 1-1 and 1-2. Portions of these activities may be delegated to external organizations qualified to the requirements of this Operational QA Program, hereafter referred to as QA Program; however, the responsibility shall remain with the Supply System.

1.3 MANAGEMENT RESPONSIBILITIES

1.3.1 The Managing Director is responsible for the establishment of policies and for overall management of Supply System operations. The Managing Director has issued a Management Statement which commits the Supply System to design, construct, and operate its nuclear power plants without jeopardy to the health and safety of the public. The Managing Director is the ultimate Supply System



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authority on matters involving quality. The Managing Director operates through the Assistant Managing Director, Operations; Director, Projects; Director, Information; and the Chief Financial Officer to provide for engineering, construction, procurement, quality assurance/quality control, and operations activities for all Supply System nuclear power plants.

1.3.2 The Assistant Managing Director, Operations reports to the Managing Director and is responsible for:

- a. Safe and efficient operation of all Supply System nuclear power plants.
- b. Safe and successful completion of initial testing activities for WNP-2 (through the WNP-2 Plant Manager).
- c. Establishing and monitoring maintenance systems common to all nuclear power plants.
- d. Training of nuclear plant staff and support personnel.
- e. Development of programs and procedures to ensure uniform application at all nuclear power plants.
- f. Radiological protection, fire protection, plant security, emergency preparedness, and radioactive waste management.

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- g. Maintaining cognizance of changing regulatory requirements and providing controlled interface between the Supply System and regulatory agencies to assure that commitment documents receive the necessary degree and depth of reviews prior to transmittal.
- h. Providing licensing support functions in such areas as acquisition and maintenance of nuclear power plant construction permits and operating licenses.
- i. Quality Assurance program definition, implementation and effectiveness.
- j. Reviewing in-house and external events for determination of cause and necessary corrective action to minimize potential for recurrence at Supply System nuclear facilities.
- k. Engineering design and analysis support for WNP-2.

To accomplish this role, the Assistant Managing Director, Operations operates through the Plant Manager; Director, Engineering; Director, Quality Assurance; Nuclear Training Manager; Support Services Manager; WNP-2 Projects Manager; Planning and Controls Manager; Corporate Chemist; Corporate Radiological Health Officer; and Regulatory Programs Manager.

- 1.3.2.1 The Director, Quality Assurance reports to the Assistant Managing Director, Operations and is directly responsible for the definition, direction, and effectiveness of the overall Quality Assurance Program during design, construction, and operation phases of all Supply System nuclear power plants. Major functions of the Quality Assurance organization are:



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- a. Establishing and maintaining assurance programs, Nuclear Operation Standards, and directorate procedures which incorporate nuclear safety considerations and comply with the Quality Assurance (QA) criteria delineated in Appendix B to 10CFR 50.
- b. Assuring through reviews, surveillances, assessments, inspections, and audits that Supply System and its suppliers' activities are being performed in a safe and legal manner in accordance with written and approved documents which comply with applicable requirements defined by the assurance programs and Nuclear Operation Standards.
- c. Assessing the overall effectiveness of assurance programs' implementation, including evaluation of plant performance and reporting conclusions to the Managing Director.
- d. Stopping unsatisfactory work and controlling further processing, delivery, or installation of nonconforming material.
- e. Establishing and maintaining adequate and qualified assurance staffing levels based on workload analysis.
- f. Providing trending of deficiencies to identify areas where corrective actions have not minimized recurrence.
- g. Establishing, maintaining, and controlling the Operational QA Program Description (WPPSS-QA-004) and the Supply System Functional Manual for Nuclear Operation.

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- h. Certifying Supply System examination personnel for non-destructive examinations (NDE).
- i. Qualifying and certifying Supply System QC inspection and test personnel.
- j. Acquiring and maintaining ASME Certificates of Authorization and/or Owners Certificates.
- k. Ensuring that a written agreement with an Authorized Inspection Agency is obtained to provide for Authorized Nuclear In-Service Inspection Services.
- l. Establishing, managing, and administering the implementation and effectiveness of the Nuclear Safety Issues Program (NSIP).
- m. Supporting the Corporate Nuclear Safety Review Board (CNSRB) in its activities as defined by the Technical Specifications.

The Director, Quality Assurance has effective communication channels with all Supply System senior management positions and has no duties or responsibilities unrelated to quality/safety assurance. To accomplish the above defined role, the Director, Quality Assurance operates through the Manager, Quality Assessments and the Manager, Quality Support.

The qualification requirements for this position are as described in Appendix I, Qualification Requirements.



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- 1.3.2.1.1 The Manager, Quality Assessments reports to the Director, Quality Assurance and is responsible for directing the performance of quality assurance and quality control functions that are necessary to assure that the programs for initial testing and subsequent operation of Supply System nuclear power plants are adequate and are being implemented.

The Manager, Quality Assessments is a member of the Plant Operating Committee (see Chapter 13 of the FSAR) and has sufficient authority and organizational freedom to identify problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions. The Manager, Quality Assessments has no duties or responsibilities unrelated to quality assurance matters and has effective communication channels with all plant supervisory and management personnel.

Qualification requirements for this position are described in Appendix I, Qualification Requirements. The Manager, Quality Assessments is specifically responsible for:

- a. Assuring through reviews, surveillances, assessments, inspections, and audits that Supply System activities are being performed in a safe and legal manner in accordance with written and approved documents which comply with applicable requirements defined by the assurance programs and Nuclear Operation Standards.
- b. Providing in-plant QC functions necessary to verify that all needed examinations of material, equipment, and workmanship are made and evaluated to assure appropriate quality standards are met.

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- c. Stopping unsatisfactory work and controlling further processing, delivery, or installation of nonconforming material.
- d. Certifying Supply System examination personnel for nondestructive examination (NDE).
- e. Qualifying and certifying Supply System QC inspection and test personnel.
- f. Ensuring that documentation and equipment of WNP-1 and WNP-3 are preserved such that the quality standards can be demonstrated on restart.

The Manager, Quality Assessments accomplishes this role through the Manager, Plant Assessments; the Manager, Plant Support Assessments; the Manager, Plant Quality Control; and the Manager, WNP-1 and WNP-3 Quality Assurance.

13.2.1.1.1 The Manager, Plant Assessments and the Manager, Plant Support Assessments are directly responsible for performing internal Supply System quality assurance functions that are necessary to verify that the QA Program is being effectively implemented. This includes maintaining a sufficient number of qualified auditors to perform QA audits, as required.

Each Manager has the authority and responsibility to stop unsatisfactory work and control further processing, delivery, or installation of nonconforming material. When the unit is operating, either Manager may recommend that the unit be shut down; the Plant Manager, however, has the final responsibility for the overall evaluation of all aspects and implications of shutting down the operating unit.

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- Qualification requirements for these two positions are described in Appendix I, Qualification Requirements. The Manager, Plant Assessments and Plant Support Assessments, are specifically responsible for:
- a. Reviewing and concurring with documents affecting safety, including changes thereto, to assure that applicable quality assurance requirements have been identified and specified therein. Documents subject to review and concurrence by Quality Assurance reviewers include, but are not limited to the following: (i) procedures which address: administrative controls, operations, maintenance, technical specifications, in-service inspection and testing, modifications, calibration, testing, and fuel handling; and nonconformance and corrective action reports.
 - b. Reviewing and concurring with programs, procedures, and/or instructions (including changes thereto) of off-site Supply System organizations to assure that they are clear, address applicable quality assurance requirements, and are technically acceptable prior to approval for release.
 - c. Verifying internal Supply System activities to assure that they are being conducted in a safe and legal manner in accordance with approved programs, plans, procedures, or instructions. Such verifications will be in the form of audits, technical assessments, or quality assurance surveillances. Included in the scope of these verifications are: (i) control room operations; post modification/major maintenance testing and operational tests; maintenance, modification, repair, and calibration; personnel training; and refueling activities; (ii) activities associated with satisfying technical specifications and in-service inspection and testing; (iii) activities associated with the implementation of security, fire protection, and radiological protection

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programs; and (iv) activities including engineering, maintenance, modifications, operational problem resolution, technical support activities, and operational analysis that affect plant nuclear safety and reliability.

- d. Performing independent design, functional, and safety evaluations.
- e. Performing quality assurance audits, surveillances, technical assessments, and inspections of Supply System organizations and on-site external organizations (e.g., the engineering and maintenance support contractors).
- f. Developing evaluation schedules and selecting qualified personnel to perform the activities of this function.
- g. Certifying Audit Team Leaders.
- h. Training Quality Assurance personnel.
- i. Forwarding evaluation reports to the management positions responsible for the areas assessed and the Chairman of the Corporate Nuclear Safety Review Board for review, assessment, and/or correction of identified deficiencies.
- j. Maintaining QA verification records.
- k. Supply System initiated SSFI reviews and other similar plant safety system operability reviews.

Each Manager will be responsible for performance of the above activities within certain functional areas.



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13.2.1.1.2. The Manager, Plant Quality Control (QC) reports to the Manager, Quality Assessments and is directly responsible for performance of in-plant QC functions. In accomplishing this role, the Manager, Plant QC is responsible for:

- a. Evaluating procedures and instructions for accomplishing QC activities.
- b. Determining and establishing hold points for inspections, examinations, and/or measurements to be accomplished during maintenance, modification, repair, and testing.
- c. Performing and evaluating the inspections, examinations, and/or measurements established.
- d. Assuring that proper staffing is available to meet plant workloads.

Qualification requirements for this position are described in Appendix I, Qualification Requirements.

13.2.1.1.3 The Manager, WNP-1 and WNP-3 QA reports to the Manager, Quality Assessments and is primarily concerned with assuring that the records and equipment of the projects are maintained such that they may be shown to meet quality standards on restart.

1.3.2.1.2 The Manager, Quality Support reports to the Director, Quality Assurance and is responsible for quality evaluations of technical and operational activities, procurement quality assurance, receiving inspection, assisting in event analysis, ensuring industry operating experience is screened and reviewed, and the nonconforming condition and corrective action processes. These activities are

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necessary to assure that such activities meet or exceed regulatory requirements and are being implemented in a manner to improve the safety and performance of WNP-2.

Qualification requirements for this position are described in Appendix I, Qualification Requirements. The Manager, Quality Support is specifically responsible for:

- a. Vendor qualification, review, and concurrence with vendor furnished programs and procedures; and source verifications (e.g., surveillances, inspections, and audits at vendor facilities).
- b. Performing receipt inspection of materials and equipment received by the Supply System.
- c. Administer the WNP-2 industry and in-plant operating experience programs.
- d. Assist in the evaluation and determination of the root cause for plant-related events, including human performance factors.
- e. Perform trending of deficiencies to ensure corrective actions have been effective in minimizing recurrence.
- f. Assessing programs, processes and activities of various functional areas and operations that affect plant nuclear safety and reliability.
- g. Administering the nonconforming condition and corrective action processes.

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The Manager, Quality Support accomplishes this role through the Manager, Procurement Quality Assurance; the Manager, Operating Events Analysis and Resolutions; and the Manager, Nuclear Safety Assurance Division.

13.2.1.2.1 The Manager, Procurement Quality Assurance reports to the Manager, Quality Support and is primarily responsible for the definition and implementation of the source surveillance/audit program for verification of activities performed by Supply System vendors (including the Nuclear Steam Supply System vendors). He is further responsible for assuring that items received for WNP-2 meet the required quality standards. In addition, he provides evaluations of internal Supply System activities related to procurement storage and issuance of parts, materials, and services to assure implementation of QA Program and management requirements. The Manager, Procurement Quality Assurance is specifically responsible for:

- a. Reviewing and concurring with procurement procedures and documents for items and services.
- b. Establishing vendor witness points for inspection and release of material/equipment for shipment.
- c. QC receipt inspection of materials and equipment received by the Supply System.
- d. Establishing and maintaining evaluated vendors list.
- e. Planning, coordinating, and performing source surveillances, source inspections, and external audits to verify implementation of vendors' QA/QC programs.



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- f. Reviewing and approving vendor furnished QA/QC procedures and programs.
- g. Performing internal audits and surveillances of Materials Management organization.
- h. Reviewing for acceptance other utility audits furnished through the Nuclear Procurement Issues Committee (NUPIC).
- i. Periodic verification (using audits, technical assessments, or surveillances) of the adequacy and implementation of the QA Program and management requirements applicable to procurement; storage; and issuance of parts, materials, and services.

13.2.1.2.2 The Manager, Operating Events Analysis and Resolutions reports to the Manager, Quality Support and is responsible for:

- a. Administering the nonconforming condition and corrective action processes.
- b. Assist the cognizant organization in evaluation and determination of the root cause for plant-related events, including human performance.
- c. Tracking the implementation of plant approved corrective actions associated with a. and b. above.

13.2.1.2.3 The Manager, Nuclear Safety Assurance Division reports to the Manager, Quality Support and is responsible for providing the Independent Safety Engineering Group (ISEG) functions involving:

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- a. Assessing programs, processes and activities including engineering, maintenance, modifications, operational problems, technical support activities and operational analysis that affect plant nuclear safety and reliability.
- b. Assessing plant operations and performance regarding conformance to regulatory requirements.
- c. Evaluating industry operating experience, including recommendations for improvements in overall plant performance involving plant practices, procedures and equipment.
- d. Providing certain key operating experience information to operators and other plant personnel.

1.3.2.2 The Plant Manager for each of the Supply System nuclear power plants reports to the Assistant Managing Director, Operations and is directly responsible for safe and efficient operation of the plant in accordance with the requirements of the Operating License, the Plant Technical Specifications, and the Plant Procedures Manual. Some of the specific responsibilities of the Plant Manager are:

- a. Planning, coordinating, and directing all test, operation, modification, inspection, maintenance, and refueling activities subsequent to the issuance of an Operating License.
- b. Authorizing all plant modifications subsequent to the issuance of an Operating License.
- c. Qualifying and training plant staff.

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- d. Initiating and approving purchase requisitions.
- e. Controlling purchased equipment and materials intended for plant use.
- f. Ensuring calibrated measuring and test equipment (including installed instruments covered by the Plant Technical Specifications) is utilized at WNP-2.
- g. Dispositioning of nonconforming items.
- h. Implementing the in-service inspection program.
- i. Develop, maintain and implement a fire protection program.
- j. Off-Site Dose Calculation Manual (ODCM).

The Plant Manager operates through the Operations Division Manager, Maintenance Division Manager, Technical Services Division Manager, and Radiation Protection Manager. The plant organization and functional responsibilities of key plant personnel are described in Chapter 13 of the Final Safety Analysis Report for the applicable nuclear power plant.

- 1.3.2.3 The Manager, Nuclear Training reports to the Assistant Managing Director, Operations and is responsible for nuclear training policy and implementation, fire prevention and protection training, and training records management for nuclear plant operations.

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- 1.3.2.4 The Manager, Support Services reports to the Assistant Managing Director, Operations and is responsible for the development and implementation of policies and programs which support operation of Supply System nuclear power plants in the areas of safeguards and physical security, fitness for duty, emergency preparedness, and administration and records management. To accomplish this role, the Manager, Support Services operates through the Manager, Security Programs; Manager, Emergency Preparedness; and Manager, Administration and Records Management.
- 1.3.2.4.1 The Manager, Security Programs reports to the Manager, Support Services and is responsible for overall Supply System security activities. The Manager, Security Programs is specifically responsible for:
- a. Administering a security program which includes preemployment screening, physical security surveys and investigations, loss prevention, and fitness for duty.
 - b. Managing the security force by assuring that physical security is consistent with needs and is maintained within individual plant safeguards security plans.
 - c. Providing training, administrative, and technical support to the Plant Manager in the area of plant security.
- 1.3.2.4.2 The Manager, Emergency Preparedness reports to the Manager, Support Services and is responsible for developing and maintaining an emergency response program that includes plans, implementing procedures, training, and drills and exercises.

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1.3.2.4.3 . The Manager, Administration and Records Management reports to the Manager, Support Services and is responsible for:

- a. Developing and implementation of administrative controls for plant procedures, processes and systems to maintain nuclear plant design, construction, and operating records.
- b. Providing program definition and policy development for Supply System records management activities, which includes processing, retrieval, storage and dispositioning of records.
- c. Providing administrative support functions necessary for the maintenance of manuals and procedures.
- d. Managing an administrative process by which engineering-related activities and commitments are assigned, scheduled, tracked, and dispositioned.

1.3.2.5 The Manager, WNP-2 Projects reports to the Assistant Managing Director, Operations and is responsible for the management of major plant modifications, maintenance tasks, and contractor support. In addition, the Manager, WNP-2 Projects provides integrated planning, estimating, scheduling, and monitoring for WNP-2 projects and programs; and provides project management of focused technical studies on operational improvement and/or uprating of operational power plants.

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- 1.3.2.6 The Corporate Chemist reports to the Assistant Managing Director, Operations and is responsible for policy development, oversight, and integration of matters pertaining to chemistry at WNP-2. In addition, the Corporate Chemist provides the environmental sciences function which performs nonradiological monitoring and Fitness For Duty chemical analysis:
- 1.3.2.7 The Corporate Radiological Health Officer reports to the Assistant Managing Director, Operations and is responsible for the development and oversight of radiation protection policies and programs which support operation of WNP-2. The Corporate Radiological Health Officer provides support to WNP-2 through the radiological environmental monitoring program, bioassay program, and audits and evaluation of the Radiation Protection Program.
- 1.3.2.8 The Manager, Regulatory Programs reports to the Assistant Managing Director, Operations and is responsible for:
- a. Acquiring and maintaining operating licenses of Supply System nuclear power plants.
 - b. Establishing and maintaining interfaces between the Supply System and the Nuclear Regulatory Commission.
 - c. Defining and implementing programs which assure that licensing submittals receive an adequate technical review from cognizant Supply System, NSSS, or AE personnel prior to transmittal.
 - d. Tracking licensing commitments and taking action necessary to assure that they are being met in a timely manner.

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- e. Maintaining awareness of changing licensing requirements.
- f. Providing coordinated development of responses and comments to new laws, regulations, regulatory guides, and other regulatory issuances.

1.3.2.9 The Director, Engineering reports to the Assistant Managing Director, Operations and is responsible for providing project engineering and design control, reactor safety evaluation, nuclear analysis, nuclear fuel supply, and maintenance/surveillance engineering support as required for WNP-2. The Director, Engineering is specifically responsible for:

- a. Providing design and engineering support for operating plant design changes and modifications.
- b. Implementing programs for pre-service inspection, in-service inspection, and nondestructive examinations.
- c. Providing engineering support for technical resolution of nuclear safety, licensing, and geological issues.
- d. Reload fuel supply, design, and licensing.
- e. Maintaining a current engineering data base for WNP-2.
- f. Implementing configuration control by establishing site-specific policy, procedures, and methods that allow control and accountability.

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The Director, Engineering operates through the Manager, Design Engineering; Manager, Engineering Services; and Manager, Engineering Programs.

1.3.2.9.1 The Manager, Design Engineering reports to the Director, Engineering and is directly responsible for:

- a. Developing and implementing design control programs and processes by which design and design document content is defined, controlled, and verified.
- b. Managing the direct engineering and design for plant operation through retention of expert technical knowledge of plant systems, structures, and components.
- c. Managing engineering subcontractors for engineering design and other consulting services.
- d. Structural design, stress analysis, and specialized ASME Code expertise for plant pressure retaining systems and their supporting structures.
- e. Geological studies programs to determine the acceptability of plant sites and seismic design bases.

1.3.2.9.2 The Manager, Engineering Programs reports to the Director, Engineering and is directly responsible for:

- a. Performing in-service inspection and testing program plans and related code and regulatory interface.

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- b. Nondestructive examination and testing services.
- c. Materials and welding engineering and program development.
- d. Codes and standards interpretation and guidance.
- e. Equipment qualification programs.
- f. Corporate technical positions and standards, as well as operating experience reviews, related to the above topical areas.
- g. Procurement technical reviews.
- h. Engineering criteria for Class 1 and commercial grade dedicated spare parts procurement.
- i. Managing Master Equipment List (MEL), Safety Related Material (SRM), Class 1 Electrical (C1E), Restricted Use Equipment List (RUEL) data base, and other engineering data bases.

1.3.2.9.3 The Manager, Engineering Services reports to the Director, Engineering and is directly responsible for:

- a. The supply, engineering, and efficient in-core management of nuclear fuel.
- b. Transient analysis and licensing issue resolution to support technical specification changes and reload fuel licensing.



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- c. Reliability and availability analyses to improve plant performance, safety, and maintainability.
- d. Engineering support for plant computer system's software configuration control.
- e. Managing engineering support for plant operation through retention of expert technical knowledge of plant-specific analysis and requirements for continued plant operation.
- f. Managing responses to and resolution of emergent plant operation issues, safety analyses, and regulatory concerns.

1.3.3 The Director, Projects reports to the Managing Director and is responsible for providing project management support for each Supply System nuclear plant. The Director, Projects is specifically responsible for:

- a. Providing project management and engineering for power projects under construction and preservation management and engineering for mothballed power projects.
- b. Providing project management for disposition of assets from terminated power projects and disposition of major assets surplus to operating power projects.
- c. Providing for site restoration for power project sites which are to be abandoned.

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- d. Providing specialized project management for major construction projects which results in off-line completion of major additions to operating plants and support facilities.
- e. Providing specialized project management for major procurement acquisitions for operating power plants.

The Director, Projects operates through the Manager, WNP-1/3 Project; Manager, Simulator Projects; Manager, Special Projects; and Managers, WNP-1 and 3 Engineering.

1.3.3.1 The WNP-1/3 Project Manager reports to the Director, Projects and is directly responsible for:

- a. WNP-1, WNP-3, and HGP site preservation, including preservation of licenses, permits, agreements, and overall assets in a state of readiness for resumed construction.
- b. Project management in preparation for resumption of active construction projects.
- c. Approval of all construction phase-related license and permit commitments and assuring conformance to these commitments in equipment and design contracts.
- d. Sale and final disposition of assets from canceled projects WNP-4/5.

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1.3.3.2 . The Manager, Simulator Projects reports to the Director, Projects and is directly responsible for:

- a. Technical maintenance of the current simulator to support operator testing.
- b. Overall project and technical management for the procurement of the replacement simulator.
- c. Certification of the replacement simulator to applicable federal standards.

1.3.3.3 The Manager, Special Projects reports to the Director, Projects and is directly responsible for:

- a. Major construction, procurement and technical project management supporting operating power plants and facilities.
- b. Technical and project management for focused activities which are intended to improve operating plant output and reliability.

1.3.3.4 The Managers, WNP-1 and 3 Engineering report to the Director, Projects and are directly responsible for:

- a. Preservation of WNP-1 and WNP-3 design assets in a state of readiness for resumed construction.
- b. Project engineering in preparation for resumption of active construction projects.

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- c. Developing technical criteria, requirements, and specifications.
- d. Managing Architect Engineer (A/E) activities relative to development of design, implementation of licensing commitments, and testing.
- e. Approving all design phase related license and permit commitments and assuring conformance to these commitments in equipment and design contracts.
- f. Discharging the site-specific technical duties and responsibilities required of an ASME N-Certificate holder and for the Owner's Certificate of Authorizations.
- g. Technical support of plant startup and certification of plant systems readiness for operation.
- h. Preparing pre-service and in-service inspection programs for WNP-1/3.

1.3.4 The Chief Financial Officer reports to the Managing Director and is responsible for providing procurement and storage control services that are required to support operation and maintenance of Supply System nuclear power plants. To accomplish this role, the Chief Financial Officer operates through the Manager, Procurement and Materials Management.

1.3.4.1 The Manager, Procurement and Materials Management reports to the Chief Financial Officer and is responsible for:

- a. Development of Supply System procurement policies and procedures.



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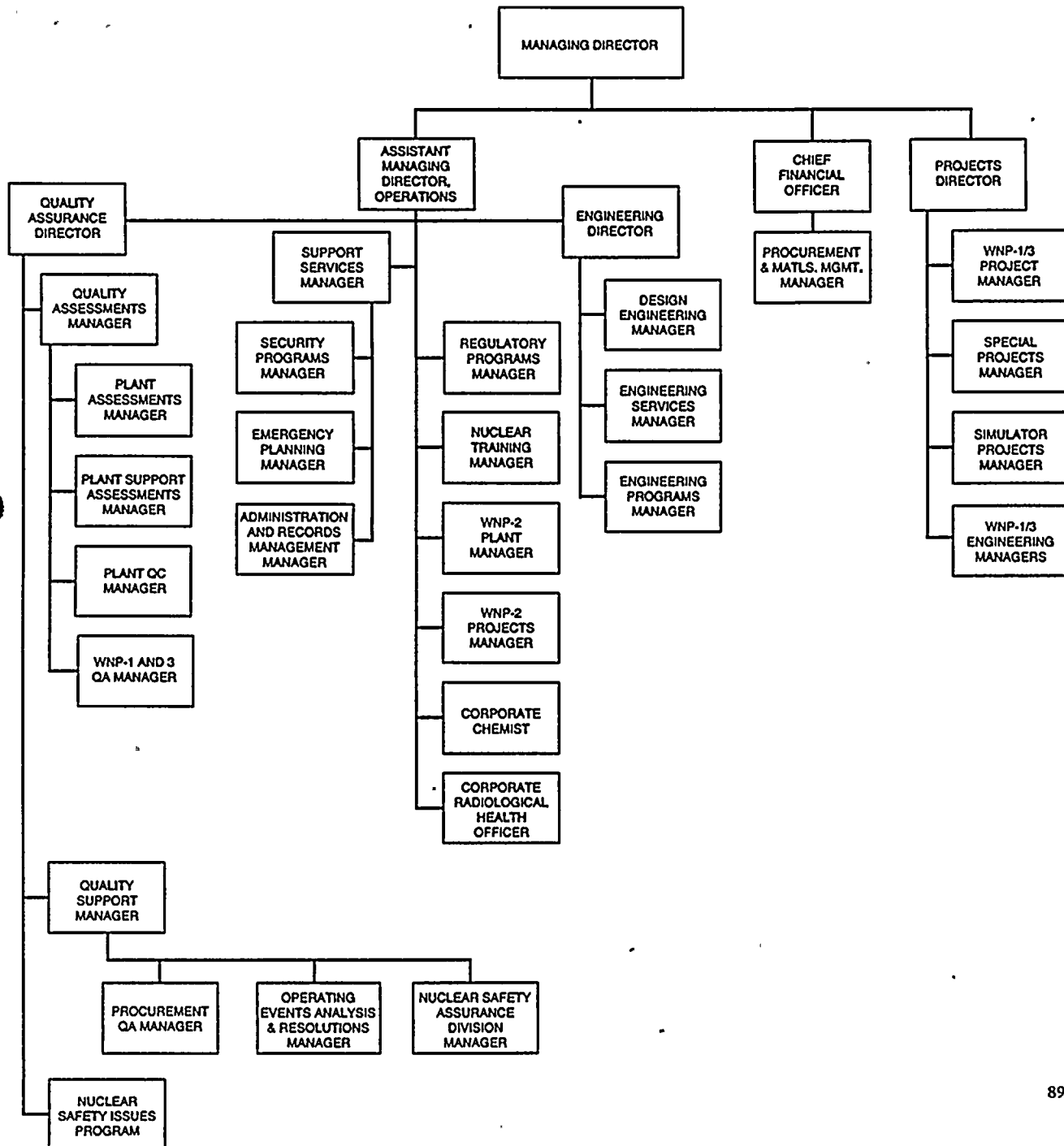
- b. Procurement of items and services in response to approved purchase requisitions.
- c. Coding, cataloguing, handling, storage, shipping, and disposal of procured items.

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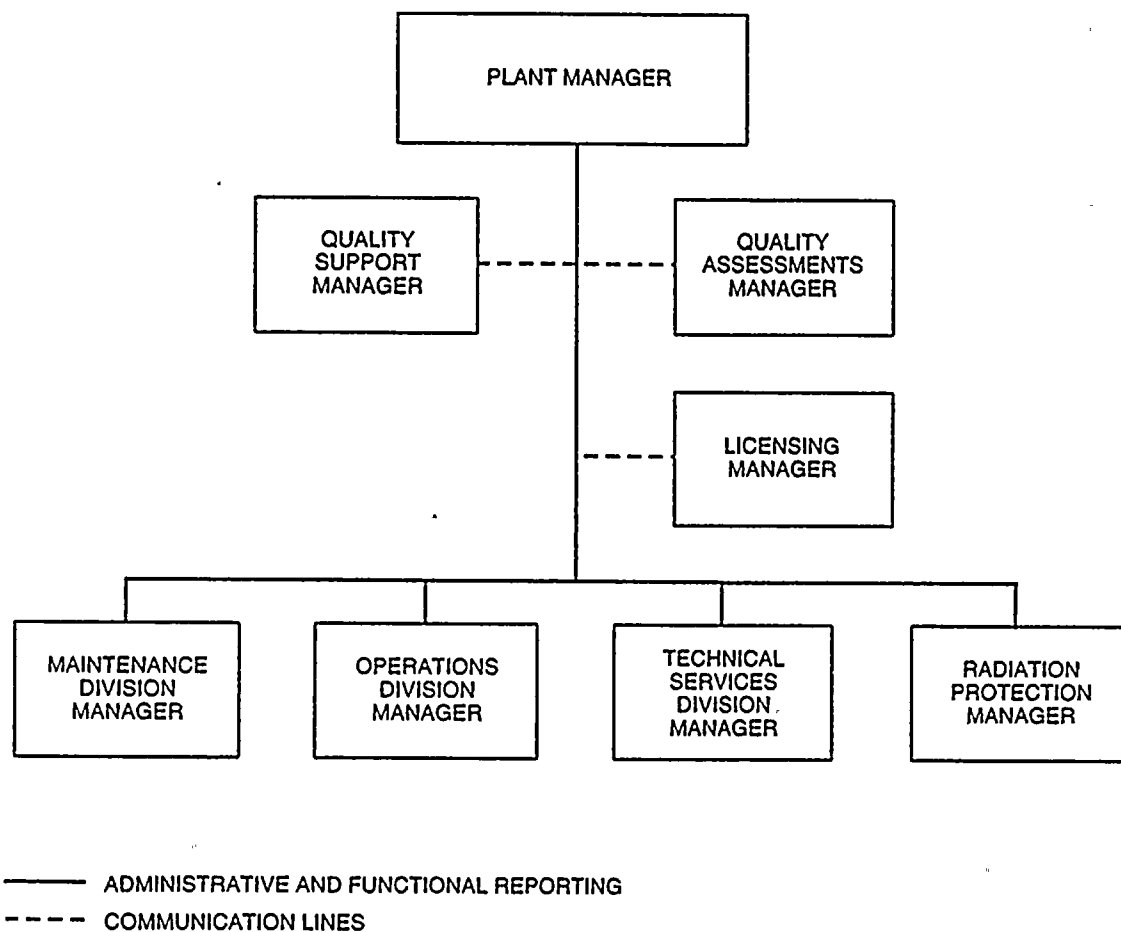
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FIGURE 1-1



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FIGURE 1-2



**Supply System Organization
Relative To Operational QA**