

PRIORITY 1

ACCELERATED RIDS PROCESSING

. REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9502020342 DOC. DATE: 95/01/26 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH. NAME AUTHOR AFFILIATION
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Discusses clarifications of NRC approval of proposed changes to OQA program description.

DISTRIBUTION CODE: Q004D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: QA Topical Report, Change, Amendment, or Correspondence (Docket/Utili

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

January 26, 1995
GO2-95-017

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

- Reference: 1) Letter, GI2-95-007, dated January 4, 1995, T.P. Gwynn (NRC) to JV Parrish (SS), "Operational Quality Assurance Program Description (WPPSS-QA-004), Related to ANSI N18.7-1976"
- 2) Letter, GO2-94-243, dated October 21, 1994, JV Parrish (SS) to NRC, "Revision To The Operational Quality Assurance Program Description (WPPSS-QA-004), Related to ANSI N18.7-1976"

Reference 1 provided approval of the Supply System's proposed changes to the OQAPD as described in Reference 2. The NRC approval of the proposed changes included several clarifications as documented in Enclosure 2 of Reference 1. The Supply System sought additional explanation from NRC Walnut Creek Field Office (WCFO) staff regarding one of these clarifications. Reference 1 was developed in the WCFO.

The particular clarification discussed with the WCFO staff was for the last sentence of item two on Enclosure 2. Based on this discussion, it is the Supply System's understanding that the intent of this sentence is to require that complete reviews, not partial reviews of procedures, be required to be creditable as biennial reviews for routine procedures. Partial reviews, such as procedure deviations at WNP-2, where the entire procedure is not looked at and approved as would occur for a procedure revision, are not acceptable for crediting as a biennial review.

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

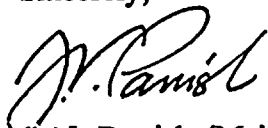
The Supply System OQAPD will include restrictions to ensure that only a comprehensive procedure review, and not a procedure deviation, be acceptable for crediting as a biennial review. Other forms of biennial reviews identified in Reference 2, such as complete use of the procedure, detailed scrutiny of the procedure as part of a documented training program, drill, simulator exercise, or other such activity shall be acceptable as stated in Reference 2. Completed procedures and/or training records shall serve as adequate documentation of performance of the biennial review. The last sentence of item 2 of Enclosure 2 was not intended to apply to these other methods.

Based on our understanding gained from clarification provided by the WCFO staff, the OQAPD will be revised to state the following for the last sentence of item two of Enclosure 2:

Routine plant procedures may be reviewed in several ways, in lieu of once every 2 years: complete use of the procedure; detailed scrutiny of the procedure as part of a documented training program, drill, simulator exercise; or other such activity. A procedure deviation is not acceptable for crediting as a biennial review. Evidence of complete procedure use and/or training records shall serve as adequate documentation for performance of the biennial review.

Please notify the Supply System should our understanding of this issue as documented above require additional discussion. Should you have any questions or desire additional information regarding this matter, please call me or D.A. Swank at (509) 377-4563.

Sincerely,



J. V. Farrish (Mail Drop 1023)
Vice-President, Nuclear Operations

DAS/ml

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
W Ang - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

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DESCRIPTION (WPPSS-QA-004), RELATED TO ANSI N18.7-1976**

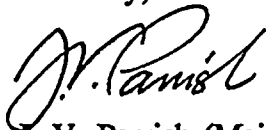
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J. V. Parrish (Mail Drop 1023)
Vice-President, Nuclear Operations

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W Ang - NRC RIV, Walnut Creek Field Office
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