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SUBJECT: Forwards Rev 22 to TR WPPSS-QA-004, "Operational QA Program Description." Rev reflect mgt & organizational changes & modifies reporting requirements as listed.

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July 18, 1995
GO2-95-136

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 22 TO OPERATIONAL QUALITY ASSURANCE PROGRAM
DESCRIPTION (WPPSS-QA-004)**

The Supply System, in accordance with 10 CFR 50.54 (a)(3), has made changes to the U.S. Nuclear Regulatory Commission (NRC) approved topical report, "Operational Quality Assurance Program Description (WPPSS-QA-004)."

Revision 22 to the OQAPD was necessary to reflect management and organizational changes. This revision modifies the reporting responsibilities as listed below:

REVISION 22

- Changed Senior Staff level positions.
- Changed position titles.
- Deleted one level of management in most organizations.
- Independent Safety Engineering Group (ISEG); administering the nonconforming condition and corrective action process (PER); root cause determination and evaluation of industry operating experiences have been reassigned to Director, Regulatory and Industry Affairs.
- Radiological Environmental Monitoring Program and Bioassay Program responsibilities have been reassigned to the Plant General Manager.
- Environmental Sciences responsibilities have been reassigned to the Plant General Manager.
- The supply, engineering, and efficient in-core management of nuclear fuel and transient analysis responsibilities have been reassigned to the Plant General Manager.
- The responsibility for technical maintenance of the simulator to support operator training and testing was reassigned to the Director, Nuclear Training.

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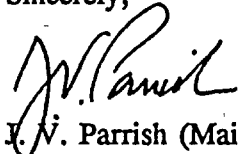
**REVISION 22 TO OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION
(WPPSS-QA-004)**

- The position and responsibilities for the Manager, WNP-2 Projects are now listed under the Director, Engineering.
- Reliability and availability analysis to improve plant performance, safety and maintainability function has been reassigned to the Director, Regulatory and Industry Affairs.

Vertical lines have been placed in the right-hand margin to identify text changes, additions and deletions.

Should you have any questions or desire additional information regarding this matter, please call me or G. O. Smith at (509) 377-6042.

Sincerely,



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

DAK/ml

Enclosures: 1) Description of OQAPD, Rev. 22 changes
2) OQAPD Revision 22

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QQAPD Rev. 22

Implementing Activity Description. The Supply System Organization is being flattened by removing one level of management for most organizations. The Training, Support Services and Regulatory Programs Divisions have been upgraded to the Director level and now report to the Vice President, Nuclear Operations. This revision included reassignment of job functions, changes in organizational responsibilities and position titles.

1. Senior Staff level positions and new titles.
 - a. The position Assistant Managing Director, Operations has a new title of Vice President, Nuclear Operations.
 - b. The position WNP-2 Plant Manager has a new title of Plant General Manager.
 - c. The position Director, Quality Assurance has a new title of Director, Quality.
 - d. The position Manager, Nuclear Training has a new title of Director, Nuclear Training.
 - e. The position Manager, Support Services has a new title of Director, Support Services.
 - f. The position Manager, Regulatory Programs has a new title of Director, Regulatory and Industry Affairs.
2. To flatten the organization, the following positions which were described in Rev. 21 have been deleted from Rev. 22:
 - a. Manager, Quality Assessments, Paragraph 1.3.2.1.1
 - b. Manager, WNP-1 and WNP-3 QA, Paragraph 1.3.2.1.1.3
 - c. Manager, Quality Support, Paragraph 1.3.2.1.2
 - d. Manager, Design Engineering, Paragraph 1.3.2.9.1
 - e. Manager, Engineering Programs, Paragraph 1.3.2.9.2
 - f. Manager, Engineering Services, Paragraph 1.3.2.9.3
3. The key changes within the Quality Assurance Directorate are:

The positions Manager, Quality Assessment; Manager, Quality Support; and Manager, WNP-1 and WNP-3 were deleted. Managers previously reporting to these positions report directly to the Director, Quality. The Manager, Plant Assessment title was changed to Manager, Quality Services. The Manager, Plant Support Assessment title was changed to Manager, Quality Support Services. The Manager, Procurement Quality

Assurance title was changed to Manager, Supplier Quality. The functions performed by the Manager, Operating Events Analysis and Resolutions and Manager, Nuclear Safety Assurance Division were combined and transferred to Director, Regulatory and Industry Affairs.

- i. Responsibilities listed in Paragraph 1.3.2.1.1 Rev. 21 for the Manager, Quality Assessment have been reassigned to the Director, Quality or other managers within the Quality Assurance organization.
 - ii. Responsibilities listed in Rev. 22 for the Manager, Quality Services and Manager, Quality Support Services as shown in Paragraph 1.3.2.1.1 have been clarified to remove duplicate/redundant statements.
 - iii. Responsibilities listed in Paragraph 1.3.2.1.2 Rev. 21 for the Manager, Quality Support that applied to vendor qualification, inspection, receiving inspection, or audits of vendor facilities have been reassigned to Manager, Supplier Quality. All other responsibilities have been reassigned to the Director, Regulatory and Industry Affairs.
 - iv. The functions listed in Paragraph 1.3.2.1.2.2 and 1.3.2.1.2.3, Rev. 21: Independent Safety Engineering Group (ISEG); administering the nonconforming condition and corrective action process (PER); root cause determination and evaluating industry operating experiences have been reassigned to the Director, Regulatory and Industry Affairs.
4. The following revisions have been made to Section 1 - Organization, for the Plant General Manager, Paragraph 1.3.2.2 Rev. 22.
 - a. Revised Paragraph 1.3.2.2 to reflect new position titles.
 - b. Radiological Environmental Monitoring Program and Bioassay Program responsibilities previously assigned to Corporate Radiological Health Officer Paragraph 1.3.2.7 Rev. 21 have been transferred to Plant General Manager.
 - c. Environmental sciences responsibilities previously assigned to the Corporate Chemist Paragraph 1.3.2.6 Rev. 21 have been transferred to Plant General Manager.
 - d. The supply, engineering, and efficient in-core management of nuclear fuel and Transient analysis responsibilities assigned to Director, Engineering Paragraph 1.3.2.9 and Manager, Engineering Services Paragraph 1.3.2.9.3 Rev. 21 have been transferred to Plant General Manager.

5. The following changes have been made to Section 1 - Organization, Rev. 22 for the Director, Nuclear Training Paragraph 1.3.2.3.
 - a. Revised to reflect new position titles.
 - b. Responsibility for technical maintenance of the simulator to support operator training and testing was added. This function was assigned to the Manager, Simulator Project Paragraph 1.3.3.3 Rev. 21. That position has been deleted.
6. The following changes have been made to Section 1 - Organization, Rev. 22 for the Director, Support Services.
 - a. Paragraph 1.3.2.4, 1.3.2.4.1, 1.3.2.4.2, and 1.3.2.4.3 were revised to reflect new position titles.
7. The position and responsibilities for The Manager, WNP-2 Projects Paragraph 1.3.2.5 Rev. 21 are listed in Rev. 22 under Director, Engineering.
8. The following changes have been made to Section 1 - Organization, Paragraph 1.3.2.5 Rev. 22 for the Corporate Chemist. The responsibilities listed in Rev. 21 for environmental sciences function which performs nonradiological monitoring and Fitness For Duty chemical analysis has been reassigned to the Plant General Manager .
9. The following changes have been made to Section 1 - Organization, Paragraph 1.3.2.6 Rev. 22 for the Corporate Radiological Health Officer. The responsibilities listed in Rev. 21 for radiological environmental monitoring program and bioassay program have been reassigned to the Plant General Manager.
10. The following changes have been made to Section 1 - Organization, Paragraph 1.3.2.7 Rev. 22 for the Director, Regulatory and Industry Affairs. Changes include; position title change for the Director, editorial clarification on responsibilities, and added four (4) managers reporting to the Director. New responsibilities include:
 - a. Administering the WNP-2 industry and in-plant operating experience programs; providing the Independent Safety Engineering Group (ISEG) functions; and administering the nonconforming condition and corrective action processing including assisting the cognizant organization in evaluation and assisting in determination of the root cause for plant-related events. These function were listed in Rev. 21 as responsibilities under the Director, Quality Assurance.
 - b. Reliability and availability analysis to improve plant performance, safety and maintainability. These function were listed in Rev. 21 as responsibilities under the Director, Engineering and Manager Engineering Services.

11. The following changes have been made to Section 1 - Organization, Paragraph 1.3.2.8 Rev. 22 for the Director, Engineering.
 - a. The position and responsibilities for Manager, WNP-2 Projects listed in Paragraph 1.3.2.5 Rev. 21 have been reassigned to Engineering.
 - b. The responsibilities for Fuels Engineering, Safety Analysis (Transient Analysis Function) and Plant Support Engineering listed in Rev. 21 have been transferred to the Plant General Manager.
 - c. The responsibilities for Safety Analysis (PSA Function) listed in Rev. 21 have been transferred to the Director, Regulatory and Industry Affairs.
 - d. Position titles for the various managers within the Engineering organization have been revised.
 - e. The responsibilities for the managers reporting to the Director, Engineering have been removed from the OQAPD and will be described in Chapter 13 of the WNP-2 FSAR.
 - f. The responsibilities for the Director, Engineering were clarified.
12. Title changes were made in Paragraph 1.3.3 Rev. 22 for the Director, Projects and responsibilities for Projects WNP-3, WNP-4, and WNP-5 were transferred to The Chief Financial Officer. Responsibilities for the managers reporting to the Director, Projects were removed from the OQAPD.
13. Paragraph 1.3.4 Rev. 22 for the Chief Financial Officer was changed to add the responsibilities for sale and demolition of Projects WNP-3, WNP-4, and WNP-5.
14. Figures 1-1 and 1-2 Rev. 22 have been revised to show the revised organizational structure and position titles.
15. Section 2 - Quality Assurance Program, Rev. 15 includes new position titles in paragraphs 2.2.2 and 2.2.6. Table 2-1 was changed to delete reference to NOS-38, Radiation Protection Program, and NOS-48, Application of 10CFR50.59.

The Radiation Protection Program NOS-38, is not governed by the requirements of 10CFR50, Appendix B. The Radiation Protection Program is governed by 10CFR20. NOS-38 was removed from the program, but the requirements for performing a 10CFR50.59 review remain. All of the requirements for performing 10CFR50.59 reviews are located in PPM 1.3.43, which is the implementing procedure. Having both a NOS and a PPM was not necessary.

16. Section 7 Rev. 7 - Control of Purchased Material, Equipment, and Services has been modified to the correct organization title in paragraph 7.2.2.b.
17. Appendix I Rev. 10 - Qualification Requirements has been modified to show revised position titles in paragraph I.1 and I.2.