

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

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Manager, Quality Date Effective


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WASHINGTON PUBLIC POWER  
SUPPLY SYSTEM

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### MANAGEMENT STATEMENT

It is the policy of Washington Public Power Supply System (hereinafter called the "Supply System") to design, construct and operate its nuclear power plants without jeopardy to the health and safety of the public. In support of this policy, the Supply System has established a Quality Assurance Program that is described in the following two documents:

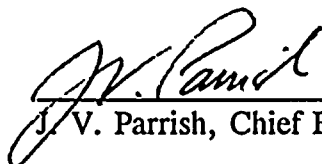
1. Quality Assurance Program for Design and Construction
2. Operational Quality Assurance Program Description (Operations Phase)

These two documents contain the official Supply System Quality Assurance policies. All Supply System employees shall adhere to these policies.

The Operational Quality Assurance Program Description meets the applicable requirements of 10CFR 50, Appendix B.

The Quality Department is mandated the responsibility and authority for establishing, administering, and assuring implementation of the Supply System Quality Assurance Program. The Manager, Quality has the responsibility and authority, including stop work authority, to perform actions necessary to accomplish this mandate as delineated in the Corporate Quality Assurance Program manuals and documents.

The Quality Department has my delegated approval authority for the Operational Quality Assurance Program Description and any necessary modifications.

  
J. V. Parrish, Chief Executive Officer/Date 6/13/96



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**OPERATIONAL  
QUALITY ASSURANCE PROGRAM DESCRIPTION****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 Chief Executive Officer is responsible for the establishment of policies and for overall management of Supply System operations. The Chief Executive Officer 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 Chief Executive Officer has the responsibilities as the Chief Nuclear Officer, is the ultimate Supply System authority on matters involving Plant Nuclear Safety and Quality, and appoints the members of the Corporate Nuclear Safety Review Board (CNSRB), including the Chairman and Alternate Chairman. The Chief Nuclear Officer operates through the Vice President, Nuclear Operations; Vice President, Operations Support/Public Information Officer; and Vice President, Administration/Chief Financial Officer, to provide for engineering, construction, procurement, quality assurance/quality control, and operations activities for Supply System nuclear power plants.





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1.3.2 The Vice President, Nuclear Operations reports to the Chief Executive Officer and is responsible for:

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

To accomplish this role, the Vice President, Nuclear Operations operates through the Plant General Manager; Engineering General Manager; Manager, Nuclear Training; Corporate Chemist; and Corporate Radiological Health Officer.

1.3.2.1 The Engineering General Manager reports to the Vice President, Nuclear Operations and is responsible for providing project engineering and design control, nuclear fuel supply, and maintenance/operation engineering support as required for WNP-2. The Engineering General Manager is specifically responsible for:

- a. Developing, maintaining, and implementing design control programs and processes by which plant design, and design changes, and modifications are defined, controlled, and verified.
- b. Developing and maintaining programs for in-service inspection, and materials and welding engineering.
- c. Providing engineering support for technical resolution of nuclear safety and licensing issues.
- d. Maintaining a current engineering data base for WNP-2.



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- e. Implementing configuration control by establishing site-specific policy, procedures, and methods that allow control and accountability.
- f. Management of major plant modifications, major maintenance tasks, and contractor support.
- g. The supply, engineering, and efficient in-core management of nuclear fuel.
- h. Transient analysis and licensing issue resolution to support technical specification changes and reload fuel licensing.
- i. Reliability and availability analysis to improve plant performance, safety, and maintainability.
- j. Developing and maintaining fire protection programs.
- k. Training and qualification of engineering and technical support staff.

The Engineering General Manager operates through the Manager, Design/Projects Engineering; Manager, Engineering Programs; Manager, Technical Services/Systems Engineering; and Manager, Reactor/Fuels Engineering. The Engineering organization and functional responsibilities of key personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2.

1.3.2.2 The Plant General Manager for WNP-2 reports to the Vice President, Nuclear 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 General 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.
- d. Ensuring calibrated measuring and test equipment (including installed instruments covered by the Plant Technical Specifications) is utilized at WNP-2.



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- e. Dispositioning of nonconforming items.
- f. Implementing the in-service testing program.
- g. Implementing a fire protection program.
- h. Off-Site Dose Calculation Manual (ODCM).
- i. The Radiological Environmental Monitoring Program and Bioassay Program.
- j. Environmental sciences function which performs nonradiological monitoring and fitness for duty chemical analysis.

The Plant General Manager operates through the Operations Manager, Maintenance Manager, Plant Support Services Manager, and Planning/Scheduling/Outage Manager. The plant organization and functional responsibilities of key plant personnel are described in Chapter 13 of the Final Safety Analysis Report for WNP-2.

- 1.3.2.3 The Manager, Nuclear Training reports to the Vice President, Nuclear Operations and is responsible for nuclear training policy and implementation, fire prevention and protection training, technical maintenance of the simulator to support operator training and testing, and training records management for nuclear plant operations.
- 1.3.2.4 The Corporate Chemist reports to the Vice President, Nuclear Operations and is responsible for policy development, oversight, and integration of matters pertaining to chemistry at WNP-2.
- 1.3.2.5 The Corporate Radiological Health Officer reports to the Vice President, Nuclear 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 coordination of radiation protection projects and long range planning, program oversight, audits and evaluation of the Radiation Protection Program.
- 1.3.3 The Vice President, Operations Support/Public Information Officer reports to the Chief Executive Officer 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:
  - a. Quality Assurance program definition, implementation and effectiveness.

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- b. 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.
- c. Providing licensing support functions in such areas as acquisition and maintenance of nuclear power plant construction permits and operating licenses.
- d. Safeguards, physical plant security and fitness for duty.
- e. Emergency preparedness, safety and health.
- f. Procurement, inventory, spare parts engineering, vendor quality, and warehousing.
- g. Reviewing in-house and external events for determination of cause and necessary corrective action to minimize potential for recurrence at Supply System nuclear facilities.

To accomplish this role, the Vice President operates through the Manager, Quality; Manager, Regulatory Affairs; Manager, Security; and Manager, Procurement.

**1.3.3.1**

The Manager, Quality reports to the Vice President, Operations Support/PIO 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 organization are:

- 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, nondestructive examinations, 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.



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- c. Assessing the overall effectiveness of assurance programs' implementation, including evaluation of plant performance and reporting conclusions to the Chief Executive Officer.
- d. Stopping unsatisfactory work and controlling further processing, delivery, or installation of nonconforming material.
- e. Establishing and maintaining adequate and qualified assurance staffing levels.
- 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.
- h. Certifying Supply System examination personnel for non-destructive examinations (NDE).
- i. Qualifying and certifying Supply System Audit Team Leaders, 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. Administering the WNP-2 industry and in-plant operating experience programs.
- n. Providing the Independent Safety Engineering Group (ISEG) functions for assessing programs, processes and activities of various areas and operations that affect plant nuclear safety and reliability.
- o. Administering the nonconforming condition and corrective action processing including assisting the cognizant organization in evaluation and determination of the root cause for plant-related events.





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The Manager, Quality has effective communication channels with all Supply System senior management positions and has no duties or responsibilities unrelated to quality assurance that would prevent his full attention to Quality Assurance Program matters. To accomplish the above defined role, the Manager, Quality operates through the Supervisor, Quality Services; and Supervisor, Quality Programs.

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

A management representative from the Quality Organization is a member of the Plant Operating Committee (see WNP-2 Technical Specification) and has sufficient authority and organizational freedom to identify problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions. The representative has no duties or responsibilities unrelated to quality assurance matters and has effective communication channels with all plant supervisory and management personnel.

1.3.3.1.1 The Supervisor, Quality Services reports to the Manager, Quality and is 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.

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

Qualification requirements for this position is described in Appendix I, Qualification Requirements. The Supervisor, Quality Services is specifically responsible for:

- a. Reviewing and concurring with programs, procedures, and/or instructions affecting safety, including changes thereto, to assure that applicable quality assurance requirements have been identified and specified therein.



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- b. 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 programs; (iv) activities including engineering, maintenance, modifications, operational problem resolution, technical support activities, and operational analysis that affect plant nuclear safety and reliability; and (v) activities related to procurement, storage and issuance of parts, materials, and services to assure implementation of QA Program and management requirements.
- c. Providing the Independent Safety Engineering Group (ISEG) functions involving:
  - (i) Assessing programs, processes and activities including engineering, maintenance, modifications, operational problems, technical support activities and operational analysis that affect plant nuclear safety and reliability.
  - (ii) Assessing plant operations and performance regarding conformance to regulatory requirements.
  - (iii) Evaluating industry operating experience, including recommendations for improvements in overall plant performance involving plant practices, procedures and equipment.
  - (iv) Providing certain key operating experience information to operators and other plant personnel.

1.3.3.1.2 The Supervisor, Quality Programs reports to the Manager, Quality and is directly responsible for:

- a. Administration of the nonconforming condition and corrective action program.
- b. In-plant QC functions and nondestructive examinations.

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- c. Certifying Supply System nondestructive examination, QC, and test personnel.
- d. Maintaining Quality Program documents.

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

1.3.3.2 The Manager, Regulatory Affairs reports to the Vice President, Operations Support/PIO and is responsible for:

- a. Acquiring and maintaining operating licenses of Supply System nuclear power plants.
- b. 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.
- c. Tracking licensing commitments and taking action necessary to assure that they are being met in a timely manner.
- d. Providing coordinated development of responses and comments to new laws, regulations, regulatory guides, and other regulatory issuances.
- e. Developing and maintaining an emergency response program that includes plans, implementing procedures, training, and drills and exercises.

1.3.3.3 The Manager, Procurement reports to the Vice President, Operations Support/PIO and is responsible for contracting, procurement and storage control services that support operation and maintenance of Supply System nuclear power plants, the sale and demolition of Projects WNP-3, WNP-4 and WNP-5, and 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. These responsibilities include:

- a. Development of Supply System procurement policies and procedures.
- b. Procurement of items and services in response to approved purchase requisitions.



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- c. Coding, cataloging, handling, storage, shipping, and disposal of procured items.
- d. Providing project management for disposition of assets from terminated power projects and disposition of major assets surplus to operating power projects.
- e. Maintaining the Restricted Use Equipment List (RUEL).
- f. Providing criteria for Class 1 and commercial grade dedicated spare parts procurement.
- g. Establishing vendor witness points for inspection and release of material/equipment for shipment.
- h. QC receipt inspection of materials and equipment received by the Supply System.
- i. Establishing and maintaining evaluated vendors list.
- j. Planning, coordinating, and performing source surveillances, source inspections, and external audits to verify implementation of vendors' QA/QC programs.
- k. Reviewing and approving vendor furnished QA/QC procedures and programs.
- l. Reviewing for acceptance other utility audits furnished through the Nuclear Procurement Issues Committee (NUPIC) or Nuclear Energy Institute (NEI).

1.3.3.4 The Manager, Security Programs reports to the Vice President, Operations Support/PIO 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.





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- c. Providing training, administrative, and technical support to the Plant General Manager in the area of plant security.

1.3.3.5 The Vice President Administration/Chief Financial Officer reports to the Chief Executive Officer and is responsible for providing Administrative Services that are required to Support Operation and Maintenance of WNP-2. To accomplish this role, the Vice President operates through the Manager, Administrative Services.

1.3.3.6 The Manager, Administrative Services reports to the Vice President, Administrative/Chief Financial Officer and is responsible for:

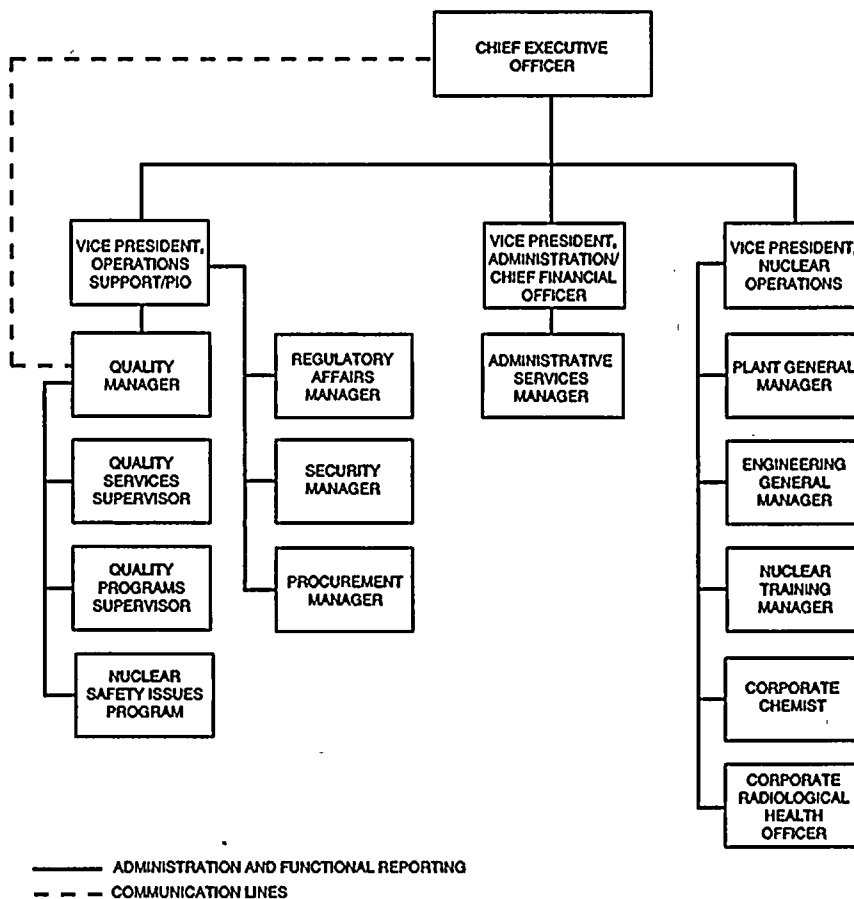
- a. Developing and implementation of administrative controls for plant procedures, processes and systems to maintain nuclear plant design, construction, and operating records.
- b. Providing program definition and policy development for Supply System records management activities, which includes processing, 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.





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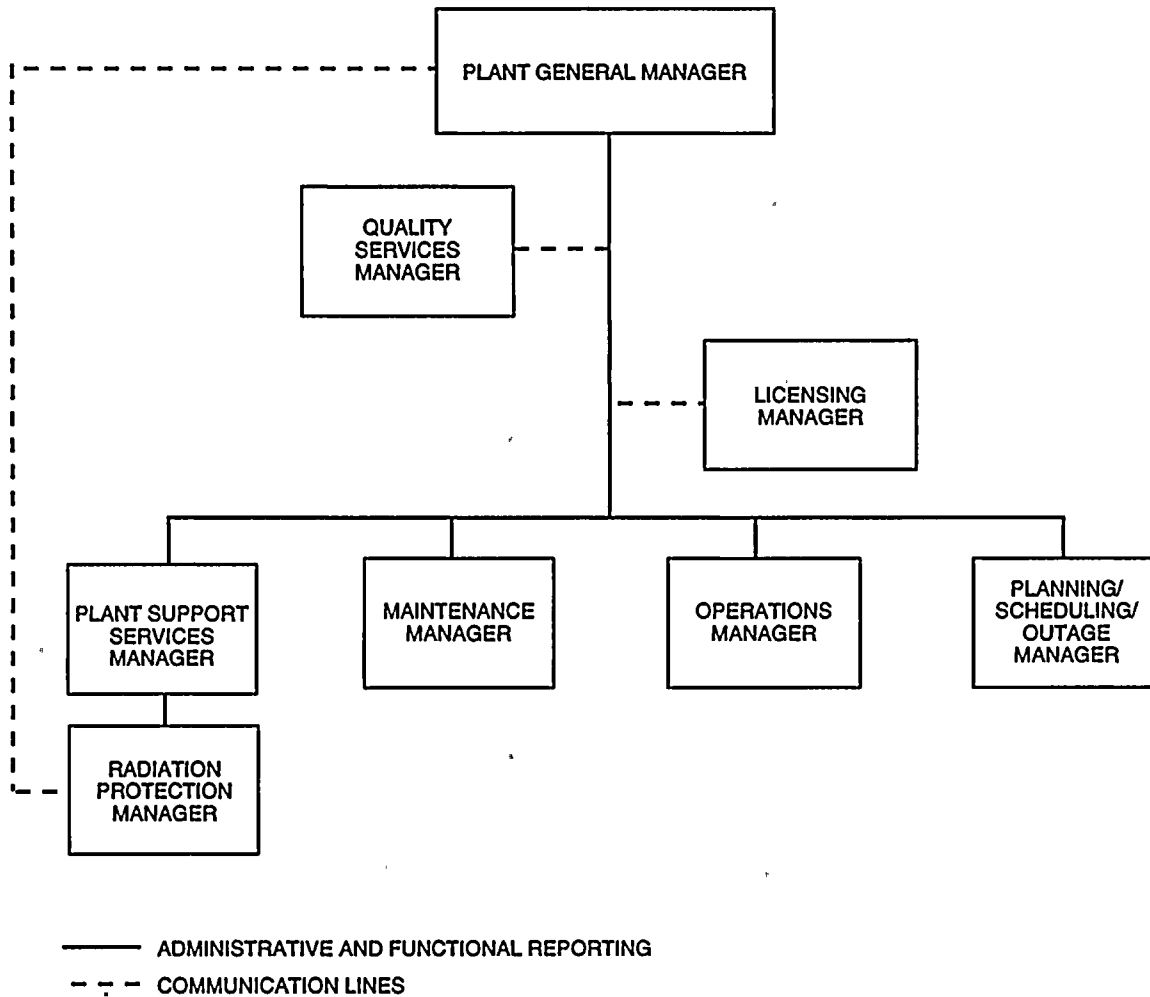
FIGURE 1-1



890853.1



FIGURE 1-2



**Supply System Organization  
Relative To Operational QA**

890853.2

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- 2.1 This section provides an overall description of the QA Program that will be applied to initial testing and subsequent operation and maintenance activities throughout the life of Supply System nuclear power plants.
- 2.2 **GENERAL**
- 2.2.1 The QA Program will be implemented through a series of Nuclear Operation Standards (NOSs) contained in the Supply System Functional Manual for Nuclear Operation. In turn, these NOSs will be implemented by Supply System organizational procedures, programs, or plans which prescribe detailed methods for functional accomplishment. The NOSs will address the applicable requirements of Appendix B to 10CFR 50 and Sections 1 through 18 of the QA Program. A matrix of Nuclear Operation Standards cross referenced against each criteria of Appendix B to 10CFR 50 is included in Table 2-1. The NOSs and implementing procedures, programs, or plans will collectively comply with the regulatory positions of QA-related Regulatory Guides as identified and modified in Appendix II, Position Statements. The NOSs are being replaced by Site Wide Procedures (SWPs). These procedures contain the same information currently in the NOSs, and implement the QA Program. Table 2-2 lists the SWPs and are cross referenced to the criteria of 10CFR50, Appendix B.
- 2.2.2 A list of safety-related items that will be subject to the applicable controls of the QA Program is included in the Final Safety Analysis Report (FSAR) for the applicable Supply System nuclear power plant. Changes to this listing shall be controlled by the Engineering, General Manager and approved by the Plant General Manager.
- 2.2.3 Applicable provisions of the QA Program shall be implemented by the earliest of the following and shall remain in effect for the life of Supply System nuclear power plants:
- a. Prior to inception of the activity.
  - b. At the time of temporary/permanent transfer of system/component custody to Test and Startup organization.
  - c. Ninety (90) days prior to initial fuel loading.



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- 2.2.4 Revisions to the QA Program will be made by the Quality organization as follows:
- a. Proposed changes to the QA Program will be evaluated to determine whether or not they would result in a reduction of commitments previously accepted by the Nuclear Regulatory Commission (NRC).
  - b. Changes that do not reduce the commitments may be implemented prior to forwarding such changes to the NRC. However, all such changes shall be forwarded to the NRC at least annually.
  - c. Changes that reduce commitments will be forwarded to the NRC for their review and acceptance prior to implementation. Such changes shall be regarded as accepted by the NRC upon receipt of a letter from the NRC to this effect or sixty (60) days after submittal to the NRC, whichever occurs first.
- 2.2.5 Managers of Supply System organizations responsible for implementing the applicable provisions of the QA Program shall assure that activities that affect safety-related functions of plant items are performed by personnel who have been indoctrinated and trained. The scope, objective, and method of implementing the indoctrination and training program shall be documented. Proficiency of personnel performing activities that affect safety-related functions of plant items shall be maintained by retraining, re-examination, and/or recertifying, as applicable. Methods shall be provided for documenting training.
- 2.2.6 The scope, implementation, and effectiveness of the QA Program is routinely audited by the Quality organization. Copies of audit reports are presented to Supply System management to provide for assessment of the effectiveness of the QA Program. Additionally, at least once per two (2) years, the Supply System management arranges for an independent evaluation of the adequacy of the scope, implementation, and effectiveness of the QA Program. This is accomplished by knowledgeable personnel outside of the Quality organization to assure achievement of an objective program assessment. Results of these independent evaluations are reported to the Chief Executive Officer, Vice President, Nuclear Operations, and Vice President, Operations Support/PIO.



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**TABLE 2-1**

## OPERATIONAL QA PROGRAM DESCRIPTION IMPLEMENTING NUCLEAR OPERATION STANDARDS (Page 1 of 1)

Nuclear Operation Standards		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
NOS-1	Organizational Responsibilities/Changes	X																	
NOS-2	Control of the Functional Manual for Nuclear Operation	X				X	X												
NOS-3	Operational QA Program Description Control	X					X												
NOS-4	Plant Operations and Maintenance Control	X		X			X		X	X			X	X	X				
NOS-5	Personnel Training, Qualification and Certification	X	X								X								
NOS-6	Review Committees (CNSRB & POC)	X																	
NOS-8	Nuclear Safety Assurance Assessment Program	X																	
NOS-9	Procedures/Instructions Control	X		X		X	X												
NOS-11	Conduct of Licensing Activities	X					X												
NOS-13	Reporting of Incidents	X		X															
NOS-14	Operating Experience Review	X																	
NOS-19	Plant QC Inspection Program	X								X	X								
NOS-20	Quality Assurance Evaluations	X														X	X		X
NOS-21	ASME Pressure Boundary Work	X		X			X	X	X	X	X	X		X	X				
NOS-22	Q-List Control	X		X															
NOS-23	Plant Modification Control	X		X			X					X							
NOS-24	Control of Records	X																X	
NOS-26	Computer Software QA	X		X			X												
NOS-27	Procurement and Storage Control	X			X		X	X						X					
NOS-30	Control of Nonconformances and Corrective Action	X		X			X								X	X	X		
NOS-32	Configuration Management Program	X		X			X												
NOS-33	Inservice Inspections	X					X			X	X	X							
NOS-34	Inservice Testing of Pumps and Valves	X					X					X							
NOS-35	Nuclear Materials Control	X													X				
NOS-36	Chemistry	X													X	X			
NOS-37	Rad. Environmental Mon. Program	X																	
NOS-39	Fire Protection Program	X													X				
NOS-41	QA Program for Radioactive Materials Shipping Packages	X																	
NOS-45	Simulator Certification	X	X	X			X					X			X				



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TABLE 2-2

**OPERATIONAL QA PROGRAM DESCRIPTION  
IMPLEMENTING SITE WIDE PROCEDURES  
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Site Wide Procedures		10CFR50 Appendix B Criterion																	
Number	Title	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
SWP-PRO-01	Procedure/Instruction Use	X		X		X	X												
SWP-PRO-02	Prep./Review/Approval of Procedures	X		X		X	X												
SWP-PRO-03	Procedure Writer's Manual					X													



**OPERATIONAL  
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This section sets forth requirements for the control of new designs, changes thereto, and plant modifications that affect safety-related functions of structures, systems, and components.

**3.2 GENERAL**

3.2.1 Organizations (both internal and external) participating in the preparation, review, approval, and verification of design documents (drawings, design input and criteria, specifications, design analysis, computer programs, system descriptions, procedures, and instructions) associated with new designs, changes thereto, and plant modifications shall develop and implement procedures that clearly delineate actions to be accomplished. These procedures shall contain provisions to assure that:

- a. Applicable regulatory requirements and design bases specified in the Final Safety Analysis Report are correctly translated into design documents.
- b. Appropriate quality standards are specified and included in design documents and that changes from such standards are documented, approved, and controlled.
- c. Design analysis (reactor physics, stress, thermal, hydraulic, accident, etc.) is performed, where applicable.
- d. Items such as compatibility of materials, parts, components, and processes selected; accessibility for inservice inspection, maintenance, and repair; and delineation of acceptance criteria for inspections and tests are considered, where applicable, during the design development and review phases.
- e. Errors and deficiencies discovered in approved design documents that could adversely affect safety-related structures, systems, and components are documented and that appropriate corrective action is taken.
- f. Development, maintenance, and use of computer code programs is controlled. Where the use of a particular computer code for performing design calculations is specified, such computer code is verified and certified for use.



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- 3.2.2 Where two or more design organizations are involved in the performance of design, necessary interface controls (both internal and external) shall be documented and controlled between the participating organizations, particularly in the area of review, approval, release, distribution and revision of interface documents.
- 3.2.3 Design verification, to provide assurance that the design meets the specified design inputs, shall be performed by utilizing methods such as design reviews, alternate calculations, or qualification testing.
- 3.2.4 Design verification procedures shall be established and implemented. These procedures shall:
- a. Provide for the determination of the method for design verification that will be utilized.
  - b. Provide assurance that the design verification is performed and documented by personnel other than those who performed the original design but who may be from the same organization.
  - c. Identify the responsibilities of the verifier; areas, features, and pertinent considerations to be verified; and the documentation to be generated.
  - d. Require that where verification method is only by test, the prototype, component, or feature testing is performed at the earliest practicable stage and under the most adverse design conditions.
  - e. Require the accomplishment of design verification, in all cases, prior to relying upon the item to perform its safety function.
- 3.2.5 Design documents shall be reviewed for adequacy by the originating organization unless delegated to another qualified organization. Such reviews shall be documented and maintained on file.
- 3.2.6 Changes to approved design documents shall be subjected to design control measures comparable with those that were applied to the original design and shall be approved by the same organization that approved the original design, unless delegated to another qualified organization, as applicable.
- 3.2.7 Measures shall be established to assure that plant personnel and other affected organizations are made aware of design changes/modifications that affect the performance of their duties.

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The minimum qualification requirements for key Quality Assurance personnel that will be met at the time of initial core loading or appointment to the active positions are as follows:

I.1 Manager, Quality

- a. Education: Bachelor Degree or equivalent\* in Engineering or a related science.
- b. Experience: Ten (10) years experience in the field of quality assurance, or equivalent number of years of nuclear industry experience in a management position or a combination of the two. The requirement that the manager have at least two years of experience in the administration of and adherence to the Quality Assurance Program in a significant management role directly involving nuclear power plants is being deleted.

Because the manager's duties encompass a much broader range of responsibilities than administration of the QA Program, it is not considered desirable, nor appropriate, to limit the choice of candidates to only those who have had detailed involvement in the administration of the QA Program.

I.2 Quality Services and Quality Programs Supervisors


- a. Education: Bachelor Degree or equivalent\* in Engineering or a related science.
- b. Experience: Four (4) years experience in the field of quality assurance, or equivalent number of years of nuclear plant experience in a supervisory position, preferably at an operating nuclear plant, or a combination of the two. At least one (1) of these four (4) years of experience shall be nuclear power plant experience in the implementation of the quality assurance program.

\*Equivalency will be determined based upon an evaluation of the following factors:

- 1. High school diploma or GED.
- 2. Sixty (60) semester hours of related technical education taught at the college level (900 classroom or instructor conducted hours).
- 3. Qualified as an NRC senior operator at the assigned plant.
- 4. Four (4) years of additional experience in his area of responsibility.
- 5. Four (4) years of supervisory or management experience.
- 6. Demonstrated ability to communicate clearly (verbally and in writing).
- 7. Certification of academic ability and knowledge by corporate management.
- 8. Successful completion of the Engineer-In-Training examination.
- 9. Professional Engineer License.
- 10. Associated degree in Engineering or a related science.





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## APPENDIX II

### "POSITION STATEMENTS"

This Appendix identifies those quality-related Regulatory Guides which the Supply System intends to follow during operations phase of its nuclear power plants. However, where the Regulatory Positions stated in these Regulatory Guides could lead to misunderstanding, or where alternate methods and/or solutions are implemented for accomplishment of Regulatory Positions, they are also described in this Appendix. The Supply System commitments to comply with applicable Regulatory Guides not addressed in this Appendix are or will be documented in the applicable Final Safety Analysis Report. The Supply System Positions, described in this Appendix, will be incorporated by Supply System organizations in their procedures and/or instructions for applicable activities. This Appendix will be revised, as and when necessary, by the Supply System Quality Assurance Director, in accordance with the provisions of Section 2 of the QA Program.

**II.1     REGULATORY GUIDE 1.8, REV. 1-R (May 1977) - "Personnel Selection and Training"**

The Supply System will implement the Regulatory Position of Regulatory Guide 1.8, Rev. 1-R (May 1977). For details, see Chapter 13 of the Final Safety Analysis Report for the applicable nuclear power plant.

**II.2     REGULATORY GUIDE 1.26, REV. 3 (February 1976) - "Quality Group Classifications and Standards for Water-, Steam-, and Radioactive- Waste-Containing Components of Nuclear Power Plants"**

The Supply System will implement the Regulatory Position of Regulatory Guide 1.26, Rev. 3 (February 1976).

**II.3     REGULATORY GUIDE 1.29, REV. 3 (September 1978) - "Seismic Design Classification"**

The Supply System will implement the Regulatory Position of Regulatory Guide 1.29, Rev. 3 (September 1978).




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The Supply System will implement the Regulatory Position of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972), subject to the following:

1. Regulatory Position C.1 of Regulatory Guide 1.30 (Safety Guide 30, August 11, 1972) states that ANSI N45.2.4-1972 should be used in conjunction with ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants." It is the Supply System position that ANSI N45.2-1971 is not applicable for operational phase activities of nuclear power plants. Instead the Supply System will comply with its Position Statement on Regulatory Guide 1.33.
2. Section 1.1 of ANSI N45.2.4-1972: This standard will be applied to the installation, inspection, and testing of Class 1E instrumentation, electrical systems and/or components for plant modifications comparable in nature and extent to the activities normally occurring during the initial plant design and construction phase.
3. Section 3(3) of ANSI N45.2.4-1972: Checking of records is normally accomplished during periodic surveillances and audits of the storage facility. The checking of storage records for each individual item prior to installation is not planned.
4. Section 5.1.2 of ANSI N45.2.4-1972: Inspections to verify housekeeping will be done as stated in the Supply System position statement on Regulatory Guide 1.39.
5. Section 5.2.1 of ANSI N45.2.4-1972: Tests will include those listed as appropriate. The manufacturers' recommendations shall be considered. The test procedure will specify the actual test to be performed.
6. Section 9 of ANSI N45.2.4-1972: The Supply System position, stated herein, does not address the codes and standards listed and/or referenced in this paragraph. Such position will be developed in the future, if the need arises.
7. Appendix A "Supplementary Provisions for Multi-Unit Stations" to ANSI N45.2.4-1972 is not considered applicable to Supply System nuclear power plants.



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8. Appendix B "Additional Codes, Standards and Guides" to ANSI N45.2.4-1972: Refer to Supply System Position on Section 9 of ANSI N45.2.4-1972.

## 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 procedures as follows: 1) Nonroutine plant procedures, such as emergency operating procedures, emergency support procedures, abnormal operating procedures (including annunciator response procedures), and emergency plan implementing procedures, and other procedures whose usage may be dictated by an event, shall be reviewed at least every two years and revised as appropriate, 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 credit as a biennial review. Evidence of complete procedure use and/or training records shall serve as adequate documentation for performance of the biennial review, 3) Routine plant procedures that have not been used for two years shall be reviewed before use to determine if changes are necessary, and 4) A revision of a procedure includes and constitutes a comprehensive procedure review."

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This alternate to the 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.

The procedure review and revision process is a dynamic process based on the internal identification and/or external receipt of new or revised source material. Evaluation and implementation of proposed changes to procedures occur upon identification of the need for such changes, rather than at a set review period. Programs are in place that determine if procedure revisions are required and when such changes are to be implemented. These programs serve to facilitate the timely review of procedures while ensuring both their accuracy and up-to-date status. Some examples of this dynamic review process used to identify the need for revisions to procedures include: Use of Controlled Plant Procedures; Technical Specification Surveillance Testing; Plant Modifications; Control of Nonconformances and Corrective Action; External Operational Experience Review; Vendors' Operating and Maintenance Manuals; Technical Specification, FSAR, ODCM Change Control Process; Revision of Master Data Sheets and Setpoints; Conduct of Infrequently Performed Tests or Evolutions; Conduct of Licensing Activities; and Review Committees.

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.





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The Supply System will implement the Regulatory Position of Regulatory Guide 1.37, (March 16, 1973), subject to the following:

1. Regulatory Position C.4 of Regulatory Guide 1.37 (March 16, 1973) states, in part, "Chemical compounds that could contribute to intergranular cracking or stress-corrosion cracking should not be used with austenitic stainless steel and nickel-base alloys." In clarification, the Supply System will either follow the chemical composition limits established by its Nuclear Steam Supply System vendor or establish such limits based upon a documented engineering evaluation.
2. Regulatory Position C.5 of Regulatory Guide 1.37 (March 16, 1973) states, in part, "Specifically, tools which contain materials that could contribute to intergranular cracking or which, because of previous usage, may have become contaminated with such materials should not be used on surfaces of corrosion-resistant alloys." In clarification, the Supply System will either follow the chemical composition limits established by its Nuclear Steam Supply System (NSSS) vendor, or establish such limits based upon a documented engineering evaluation.
3. Section 2.1 of ANSI N45.2.1-1973 states, in part, "Planning for cleaning activities shall include a review of the system and component design specifications and drawings. In clarification of this requirement, a review of system and component design specifications and drawings will be required for only those modifications which change the design of a fluid system.
4. Section 2.3 of ANSI N45.2.1-1973, last sentence, is revised to read, "Test reports shall include an evaluation of the acceptability of inspection and test results and provide for identifying the individual who performed the evaluation."
5. Section 3.1.2.1 of ANSI N45.2.1-1973 states, in part, "Scattered areas of rust are permissible provided the aggregate area of rust does not exceed two square inches in any one square foot area." The Supply System considers this two square inch limit as a guide only. Adequate discretion by experienced personnel will be used in all cases.



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6. Section 3.1.2.5 of ANSI N45.2.1-1973 states, in part, "There shall be no evidence of organic contamination in the effluent water or on the filter." The Supply System intends to comply with this requirement. The presence of organic contamination will be determined visually or by feel.
7. Section 4 of ANSI N45.2.1-1973, second sentence, is revised to read, "Inspections, examinations, or tests for cleanliness shall be performed if it is suspected that cleanliness has been affected by transportation to, or storage at the installation site."
8. Section 7.4 of ANSI N45.2.1-1973 requires checking of cleaning solutions for effectiveness of inhibitors (if used). In clarification of this requirement, the effectiveness of inhibitors (if used) will be determined by documentation in technical literature or manufacturer's or vendor's recommendations.

11.7 REGULATORY GUIDE 1.38, REV. 2 (May 1977) - "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water-Cooled Nuclear Power Plants"

The Supply System will implement the Regulatory Position of Regulatory Guide 1.38, Rev. 2 (May 1977), subject to the following:

1. Section 3.2.1 (1) of ANSI N45.2.2-1972: Temperature and humidity control considerations for packaging of Level A items are not considered applicable to nuclear fuel assemblies unless recommended otherwise by the nuclear fuel manufacturer. The Supply System will abide by the manufacturer's recommendation.
2. Section 3.5.2 of ANSI N45.2.2-1972, last sentence, is revised to read as, "Tapes used for identification rather than sealing which are not near a welding operation may remain indefinitely (see also Appendix Section 3.5.2 for additional requirements)."
3. Section 3.7.1 (1) of ANSI N45.2.2-1972: The Supply System may use cleated, sheathed boxes for loads up to 1,000 pounds rather than 500 pounds limit imposed here. This type of box has been tested by the WNP-2 Nuclear Steam Supply System vendor and found safe for loads up to 1,000 pounds. Other national standards allow the 1,000 pound designation (see Federal Specification PPP-B-601).



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4. Section 6.1.2 (1) of ANSI N45.2.2-1972: Temperature and humidity controls required for storage of Level A items are not considered applicable for nuclear fuel assemblies unless recommended otherwise by the nuclear fuel manufacturer. The Supply System will abide by the manufacturer's recommendation.
5. Section 6.4.2 of ANSI N45.2.2 gives detailed requirements for care of items in storage. In clarification, the Supply System will either follow manufacturer's recommendation or follow its own requirements, established based upon a documented engineering evaluation, concerning maintenance of protective covers, seals, and caps; maintenance of preservatives and inert atmosphere; energization of instrument racks and space heaters; insulation resistance testing; and rotation of shafts for rotating equipment.
6. Appendix Sections A3.4.1 (4) and A3.4.1 (5) of ANSI N45.2.2-1972: During printing of the standard, a transposition occurred between the last sentences of these sections. The Supply System will comply with the correct wording which reads as follows:

A3.4.1 (4), last sentence: However, preservatives for inaccessible inside surfaces of pumps, valves and pipe for systems containing reactor coolant water shall be the water flushable type.

A3.4.1 (5): The name of the preservative used shall be indicated to facilitate touch up.

**II.8 REGULATORY GUIDE 1.39, REV. 2 (September 1977) - "Housekeeping Requirements for Water-Cooled Nuclear Power Plants"**

The Supply System will implement the Regulatory Position of Regulatory Guide 1.39, Rev. 2 (September 1977), subject to the following:

Section 2.1 of ANSI N45.2.3-1973 requires the establishment of cleanness requirements for housekeeping activities on the basis of zone designations. The Supply System considers these zone designations and the requirements associated with each zone as impractical for implementation during the operations phase. Procedures or instructions for housekeeping activities, which include the applicable requirements outlined in Section 2.1 of ANSI N45.2.3-1973 and which take into account the radiation control considerations, security considerations and cleanness requirements, will be developed on case by case basis for maintenance and modification work to be performed.



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The Supply System will implement the Regulatory Position of Regulatory Guide 1.58, Rev. 1 (September 1980), subject to the following:

1. Regulatory Position C.5 of Regulatory Guide 1.58, Rev. 1 (September 1980) implies that individuals who review and approve inspection, examination, and testing procedures and those who evaluate the adequacy of such procedures to accomplish the inspection, examination, and test objectives, should meet the Level III capability requirements delineated in Table I of ANSI/ASME N45.2.6-1978. Not all Supply System personnel performing the types of cited functions will meet the Level III capability requirements of Table 1 of ANSI/ASME N45.2.6-1978. However, personnel performing the cited functions will be determined by Supply System management (through evaluation of their education, training, and experience) to be fully qualified and competent. The basis for the determination will be documented.
2. Section 1.2 of ANSI/ASME N45.2.6-1978, fourth paragraph, states that the requirements of this Standard apply to personnel of the owners and their suppliers. In clarification, the extent of application of the requirements of ANSI/ASME N45.2.6-1978 to Supply System suppliers will depend upon the nature and extent of materials or services furnished, and as further described in Supply System positions on Section 2.4 and 3 of ANSI/ASME N45.2.6-1978.
3. Section 2.1.2 of ANSI/ASME N45.2.6-1978 implies that personnel performing non-NDE type of inspections, examinations, and testing will be formally certified. The Supply System does not plan this formal certification. Instead, the Supply System will select such personnel to predetermined qualification requirements for the specific task based on their education, experience, and training. Formal training records, when used as the basis for qualification, will be maintained on file.
4. Section 2.4 of ANSI/ASME N45.2.6-1978 requires issuance of formal certification to individuals and specifies the details of the information to be included in the certificate. The Supply System does not plan to issue formal certificates to individuals within the scope of ANSI/ASME N45.2.6-1978 and Regulatory Guide 1.8. However, information similar to that described in this section of the Standard will be available in documented form attesting that the individual is capable of performing the assigned task(s). The Supply System will use a similar approach in evaluating supplier compliance with this section of the Standard.





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5. Section 3 of ANSI/ASME N45.2.6-1978 divides the capability requirements of inspection, examination, and testing personnel into three levels, namely Level I, Level II, and Level III. The Supply System will not assign these levels to its personnel performing inspection, examination, and testing activities. However, the selection of personnel for particular tasks will be such as to match the capabilities to the types of tasks and maintain the intent of the three levels. The judgement to determine that a person's qualifications and capabilities meet the intent of a certain level of inspection, examination, and testing function is made through the normal management process by using established administrative and personnel procedures. Documentation for such justification will be maintained on file. A similar approach will be used to evaluate the qualifications of non-NDE personnel of Supply System suppliers.

### II.10 REGULATORY GUIDE 1.64, REV. 2 (June 1976) - "Quality Assurance Requirements for the Design of Nuclear Power Plants"

The Supply System will implement the Regulatory Position of Regulatory Guide 1.64, Rev. 2 (June 1976), subject to the following:

Regulatory Position C.2 of Regulatory Guide 1.64, Rev. 2 (June 1976) states that individuals performing design verification should not have immediate supervisory responsibility for the individual performing the design. It further states that while design verification by the immediate supervisor is encouraged, it should not be construed that such verification constitutes the required independent design verification. It is the Supply System position that if the designer's immediate supervisor is the most technically qualified individual available in the organization to perform a design verification by design review, this review may be conducted by the supervisor, providing that:

- a. The justification is individually documented and approved in advance by the supervisor's management and
- b. Quality Assurance audits cover the frequency and effectiveness of use of supervisors as design verifiers to guard against abuse.



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The Supply System will implement the Regulatory Position of Regulatory Guide 1.74 (February 1974), subject to the following:

1. Regulatory Position "C" of Regulatory Guide 1.74 (February 1974) specifies certain documents recommended be included in the definition of "procurement documents", defined in ANSI N45.2.10-1973. The Supply System will use the following definition:

Procurement Documents - Purchase requisitions, purchase orders and contracts with attachments necessary to specify/verify requirements.

2. Section 2 of ANSI N45.2.10-1973: The definition of "specification" is revised to read as follows:

Specification - A statement of a set of requirements to be satisfied by a product, a material, a service or process indicating, whenever appropriate, the procedure by means of which it may be determined whether the requirements given are satisfied.

**II.12 REGULATORY GUIDE 1.88, REV. 2 (October 1976) - "Collection, Storage, and Maintenance of Nuclear Power Plant Quality Assurance Records"**

The Supply System will implement the Regulatory Position of Regulatory Guide 1.88, Rev. 2 (October 1976), subject to the following:

1. Regulatory Position C.2 of Regulatory Guide 1.88, Rev. 2 (October 1976) endorses the 4-hour fire rating requirements for a single records storage facility as described in Section 5.6 of ANSI N45.2.9-1974. The Supply System modifies this 4-hour rating requirement of ANSI N45.2.9-1974 to 2-hour fire rating requirement. Accordingly, the Supply System will comply with a substitute to the third, fourth, and fifth paragraphs of Section 5.6 of ANSI N45.2.9-1974 which reads, "Where a single record storage is maintained, the QA records shall be maintained in any one of the following four (4):



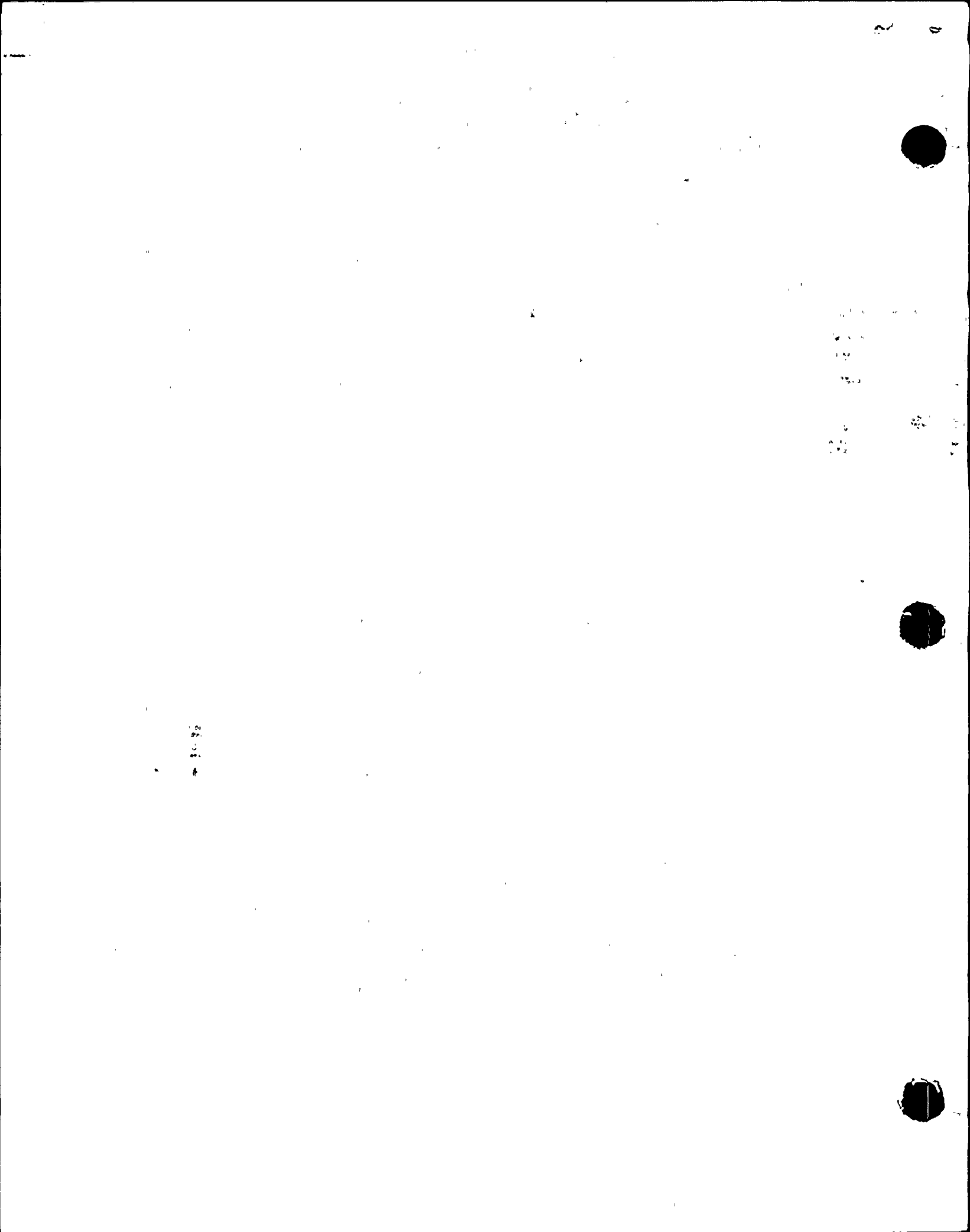
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- a. A 2-hour vault meeting NFPA (National Fire Protection Association) No. 232-1975 without additional provisions.
- b. 2-hour rated file containers meeting NFPA No. 232-1975 (Class B) without additional NFPA provisions.
- c. 2-hour rated fire resistant file room meeting NFPA No. 232-1975 with the following additional provisions:
  - (1) Early warning fire detection and automatic fire suppression shall be provided, with electronic supervision at a constantly attended central station.
  - (2) Records shall be stored in fully enclosed metal cabinets. Records shall not be permitted on open steel shelving. No storage of records shall be permitted on the floor of the facility. Adequate access and aisle ways shall be maintained at all times throughout the facility.
  - (3) Work not directly associated with records storage or retrieval shall be prohibited within the records storage facility. Examples of such prohibited activities include but are not limited to: records reproduction, film developing, and fabrication of microfiche cards.
  - (4) Smoking and eating/drinking shall be prohibited throughout the records storage facility.
  - (5) Ventilation, temperature, and humidity control equipment shall be protected inside with standard fire-door dampers where they penetrate fire barriers bounding the facility.
- d. A 2-hour fire rated facility meeting the following criteria and provisions:
  - (1) Reinforced concrete, concrete block, masonry, or equal construction.
  - (2) Floor and roof with drainage control. If floor drain is provided, a check valve (or equal) shall be included.
  - (3) Doors, structure and frames, and hardware shall be designed to comply with the requirements of a minimum 2-hour fire rating.



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- (4) Sealant applied over walls as a moisture or condensation barrier.
  - (5) Surface sealant on floor providing a hard wear surface to minimize concrete dusting.
  - (6) Foundation sealant and provisions for drainage.
  - (7) Forced air circulation with filter system.
  - (8) Fire Protection System.
  - (9) Only those penetrations used exclusively for fire protection, communication, lighting, or temperature/humidity control are allowed; all such penetrations shall be sealed or dampered to comply with the minimum 2-hour fire protection rating.
  - (10) The construction details shall be reviewed for adequacy of protection of contents by a person who is competent in the technical field of fire protection and fire extinguishing.
  - (11) If the facility is located within a building or structure, the environment and construction of that building can provide a portion or all of the criteria (1) through (9).
2. Section 3.2.2 of ANSI N45.2.9-1974 is revised to read, "Index - The quality assurance records shall be indexed. The indexing system(s) shall include, as a minimum, record retention times and the location of the records within the record system. The indexing system(s) shall provide sufficient information which can be used to identify item(s) or activity(ies)."
  3. Section 5.4.3 of ANSI N45.2.9-1974 is revised to read, "Special Processed Records - Provisions shall be made for special processed records (such as radiographs, photographs, negatives, and microfilm) to prevent damage from excessive light, stacking, electromagnetic fields, and temperature. These provisions will be delineated in procedures and/or instructions which will incorporate, or take into consideration, available manufacturers' recommendations."





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Regulatory Guide 1.94, Rev. 1 (April 1976) is not considered applicable to operations phase activities. However, the Regulatory Position of Regulatory Guide 1.94, Rev. 1 (April 1976), where appropriate, will be implemented for those applicable operational phase activities that are comparable to construction phase activities.

**II.14     REGULATORY GUIDE 1.116, REV. 0-R (May 1977) - "Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems"**

The Supply System will implement the Regulatory Position of Regulatory Guide 1.116, Rev. 0-R, (May 1977), subject to the following:

1. Regulatory Position C.3 of Regulatory Guide 1.116, Rev. 0-R (May 1977) recommends that the requirements of Section 5 of ANSI N45.2.8-1975 pertaining to preoperational tests, cold functional tests, and hot functional tests should be used in conjunction with 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.
2. Section 2.3 of ANSI N45.2.8-1975, last sentence is revised to read, "Test reports shall include an evaluation of the acceptability of inspection and test results, and provide for identifying the individual who performed the evaluation."
3. Section 2.8.2 of ANSI N45.2.8-1975 states, "Records of calibration shall be included in inspection and test results." The Supply System does not intend to include calibration records in inspection and test results. Instead, the calibration records will be maintained in a separate file.
4. Section 2.9.e(6) of ANSI.2.8.1975 states, "Evidence that engineering or design changes are documented and approved prior to installation." The Supply System may permit installation of an item prior to approval of the related engineering or design change provided procedural controls, requiring evidence of engineering or design change approval prior to placing the affected item into service, are instituted.





II.15 REGULATORY GUIDE 1.123, REV. 1 (July 1977) - "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants"

The Supply System will implement the Regulatory Position of Regulatory Guide 1.123, Rev. 1 (July 1977), subject to the following:

Section 1.3 of ANSI N45.2.13-1976: The Supply System will comply with the definition of "procurement documents" as stated in its position statement on Regulatory Guide 1.74 (February 1974).

II.16 REGULATORY GUIDE 1.144, REV. 1 (September 1980) - "Auditing of Quality Assurance Programs for Nuclear Power Plants"

The Supply System will implement the Regulatory Position of Regulatory Guide 1.144, Rev. 1 (September 1980), subject to the following:

Section 4.4.4 of ANSI N45.2.12-1977 requires the audit report to include an evaluation statement regarding the effectiveness of the quality assurance program elements that were audited. Since the audit by its very nature is an evaluation of the quality assurance program effectiveness, the audit report itself is considered to be an evaluation of the quality assurance program effectiveness. Therefore, this section of the Standard is revised to read "A Summary of Audit Results."

II.17 REGULATORY GUIDE 1.146, (August 1980) - Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"

The Supply System will implement the Regulatory Position of Regulatory Guide 1.146 (August 1980) to ANSI N45.2.23-1978.

