

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

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WASHINGTON PUBLIC POWER  
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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 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.
- h. Establishing, managing, and administering the implementation and effectiveness of the Nuclear Safety Issues Program (NSIP).

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. Administering the WNP-2 industry and in-plant operating experience programs.
- m. 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.
- n. 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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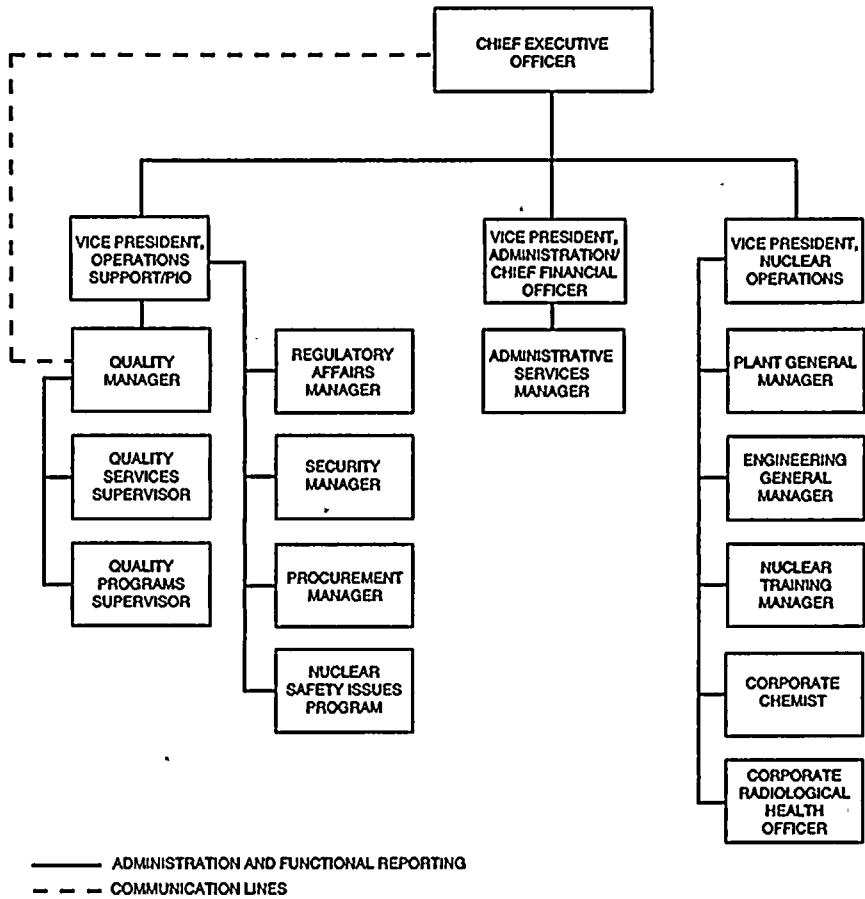
- c. Providing training, administrative, and technical support to the Plant General Manager in the area of plant security.

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:

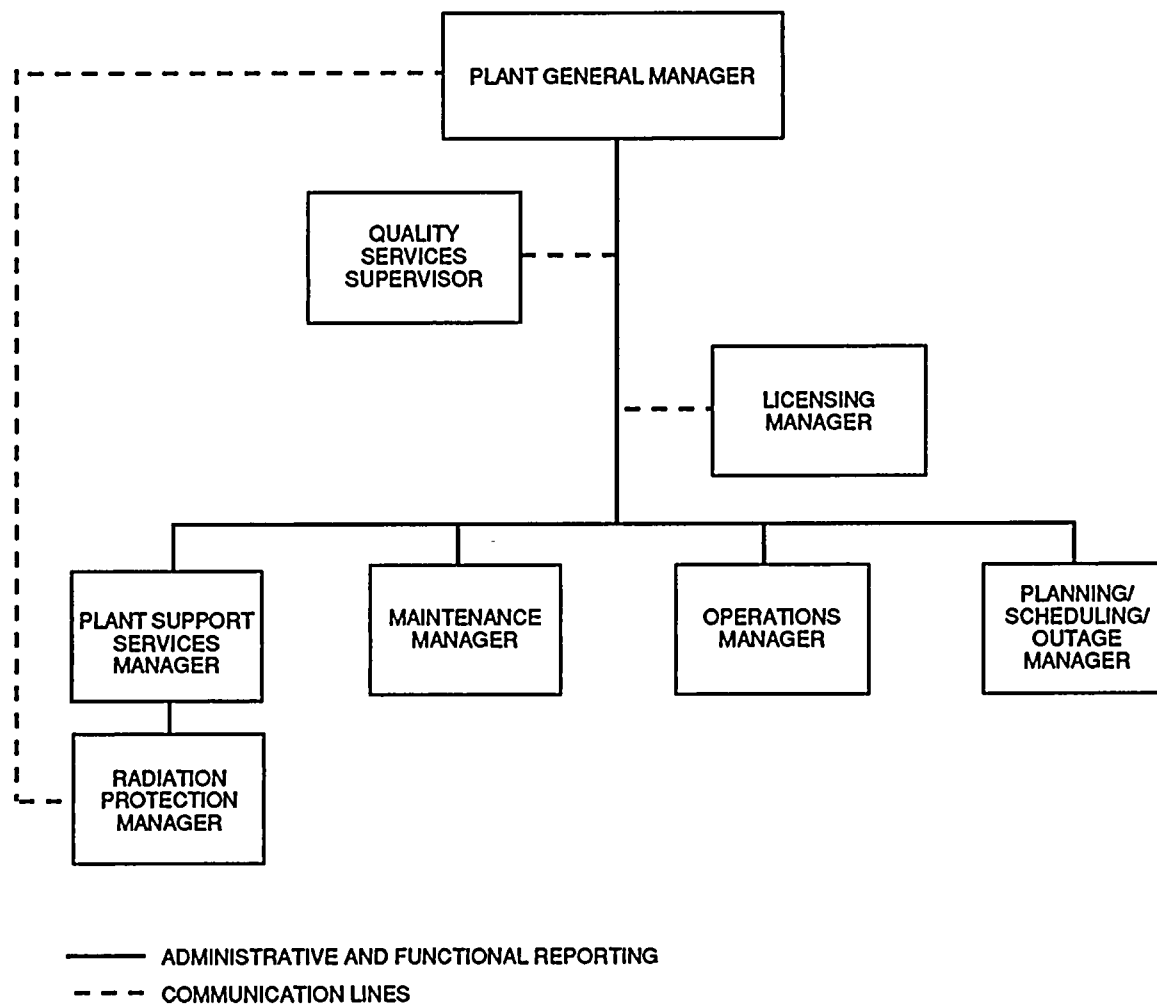
- a. Developing and implementation of administrative controls for plant procedures, processes and systems to maintain nuclear plant design, construction, and operating records.
- b. Providing program definition and policy development for Supply System records management activities, which includes processing,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

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 and the additional Quality Program requirements as identified in Appendix III. 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	
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			
NOS-37	Rad. Environmental Mon. Program	X														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 (Page 1 of 1)**

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													
SWP-PUR-01	Procurement of Services	X			X		X	X						X					
SWP-PUR-05	Emergency Purchasing				X			X											
SWP-MMP-02	Warehousing							X						X					



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## 17 - QUALITY ASSURANCE RECORDS

### 17.1 PURPOSE

This section sets forth requirements for generation, transmittal, retention, and maintenance of quality assurance records for Supply System's nuclear power plants.

### 17.2 GENERAL

17.2.1 Sufficient records shall be maintained to furnish evidence of the quality of safety-related plant items and activities. As a minimum these records shall include the following:

- a. Operating logs
- b. Results of design reviews, inspections, tests, audits, and material analysis
- c. Monitoring of work performance
- d. Qualifications of personnel, procedures, and equipment.
- e. Drawings, specifications, procedures, and procurement documents.
- f. Nonconformance and corrective action reports
- g. Records as required by Appendix III, Section 4.0.


17.2.2 Inspection and test records shall identify the following where applicable:

- a. Inspector and/or data recorder
- b. The type of observation
- c. The date and results of inspection or test.
- d. Acceptability of results.
- e. The action taken to resolve any deficiencies noted.



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- 17.2.3      Quality assurance records shall be generated (prepared, reviewed, and approved), accumulated, transmitted for incorporation into the records retention system, retained, maintained, and controlled in accordance with documented procedures and/or instructions.
- 17.2.4      The quality assurance records shall be organized and filed so that each document is identifiable and retrievable.
- 17.2.5      The quality assurance records shall be filed and maintained in facilities that provide protection from possible deterioration or damage and shall be controlled to prevent loss.

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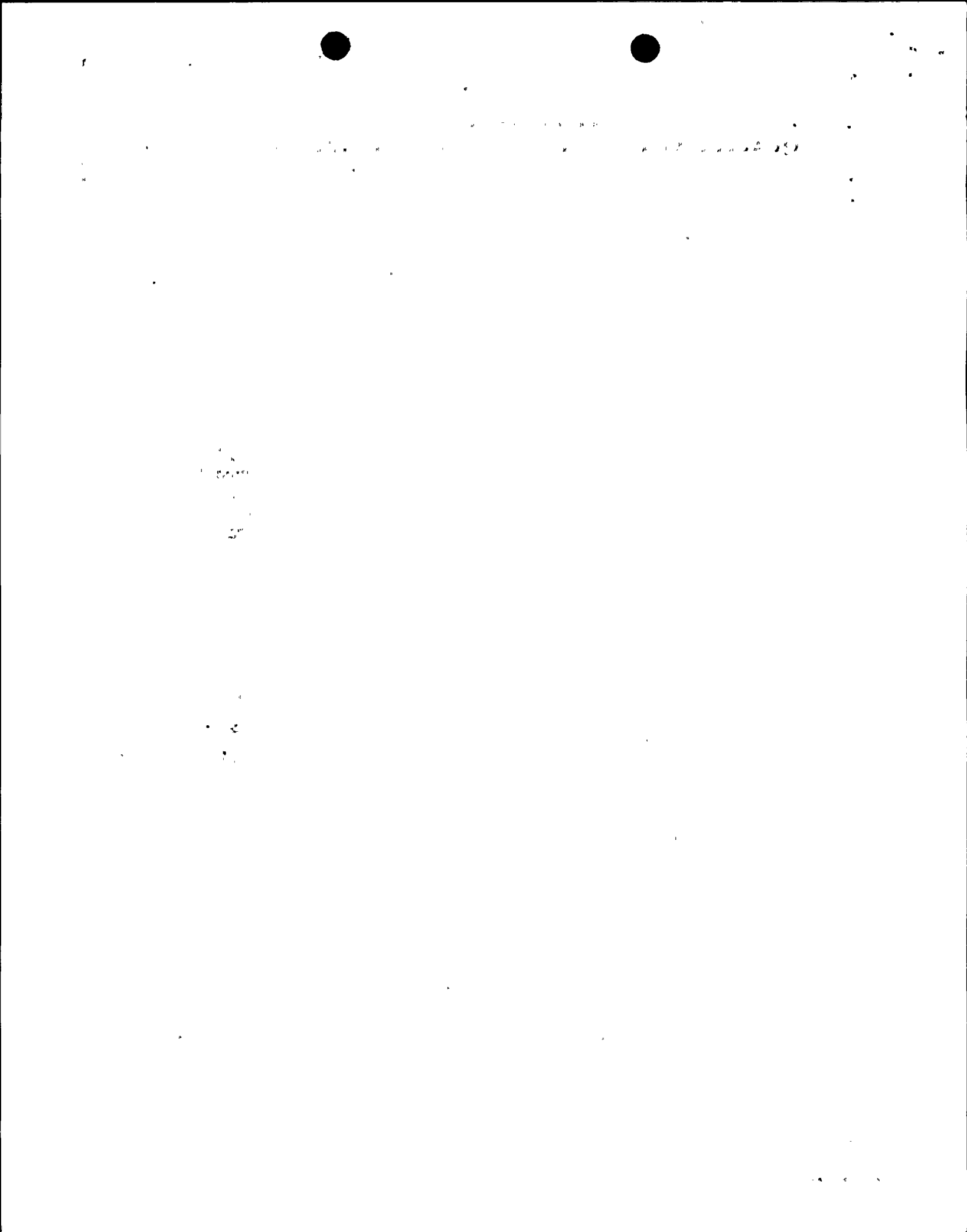
### APPENDIX III


#### "ADDITIONAL QUALITY PROGRAM REQUIREMENTS"

This Appendix identifies additional quality program requirements that were formally located in the WNP-2 Technical Specification, Section 6.0, Administrative Controls. To implement the Improved Technical Specification Program, several requirements from Section 6.0 were required to be relocated into the Operational Quality Assurance Program Description. The following requirements have been incorporated by Supply System organizations into their procedures and/or instructions. This Appendix will be revised, as and when necessary, by the Supply System Quality Department, in accordance with the provisions of Section 2 of the QA Program.

#### 1.0 NUCLEAR SAFETY ASSURANCE DIVISION (NSAD)

- 1.1 The NSAD shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The NSAD shall make detailed recommendations for revised procedures, equipment and modifications, maintenance activities, operations activities, or other means of improving unit safety to the Quality Manager.
  - 1.1.1 The NSAD shall be composed of at least five, dedicated, full-time engineers, with a minimum of three located on site. Each shall have a bachelor's degree in engineering or related science or qualifications meeting ANS.3.1 Draft Revision dated March 13, 1981, Section 4.2 or 4.4, or equivalent, as described in Section 4.1 and at least 2 years professional level experience in his field, at least 1 year of which experience shall be in the nuclear field.
  - 1.1.2 The NSAD shall be responsible for maintaining surveillance of unit activities to provide independent verification (not responsible for sign-off function) that these activities are performed correctly and that human errors are reduced as much as practical.
  - 1.1.3 Records of activities performed by the NSAD shall be prepared, maintained, and forwarded each calendar month to the Quality Manager.



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## 2.0 REVIEW AND AUDIT

### 2.1 PLANT OPERATIONS COMMITTEE (POC)

The POC shall function to advise the Plant General Manager on all matters related to nuclear safety.

#### 2.1.1 The POC shall be composed of the:

Chairman	Plant General Manager
Vice Chairman	As designated from the POC Members by the Plant General Manager and documented in the POC minutes.
Member	Operations Manager
Member	Health Physics Operations General Supervisor/RPM
Member	System Engineering/Technical Services Division Manager
Member	Maintenance Manager
Member	Administrative Manager
Member	Quality Services Supervisor
Member	Engineering Programs Manager

2.1.2 All POC alternate members shall be appointed in writing by the POC Chairman or Vice Chairman to serve on a temporary basis.

2.1.3 The Plant Operations Committee shall meet at least once per calendar month and as convened by the POC Chairman or his designated alternate.

2.1.4 The quorum of the POC necessary for the performance of the POC responsibility and authority provisions of these requirements shall consist of the Chairman or Vice Chairman and four members including alternates. No more than two alternates shall make up the quorum.

#### 2.1.5 The POC shall be responsible for:

- a. Review of (1) all proposed procedures or proposed programs required by Technical Specification 5.4 and changes thereto, and (2) any other proposed procedures or changes thereto as determined by the Plant General Manager to affect nuclear safety;
- b. Review of all proposed tests and experiments that affect nuclear safety;



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- c. Review of all proposed changes to the Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit system or equipment that affect nuclear safety;
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board;
- f. Review of all REPORTABLE EVENTS;
- g. Review of unit operations to detect potential hazards to nuclear safety;
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant General Manager or the Corporate Nuclear Safety Review Board;
- i. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- k. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Chief Nuclear Officer and to the Corporate Nuclear Safety Review Board; and
- l. Review of changes to the PROCESS CONTROL PROGRAM and the OFFSITE DOSE CALCULATION MANUAL.

**2.1.6 The POC shall:**

- a. Recommend in writing to the Plant General Manager approval or disapproval of items considered under Appendix III, 2.1.5a. through d. prior to their implementation.

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- b. Render determinations in writing with regard to whether or not each item considered under Appendix III, 2.1.5a. through e. constitutes an unreviewed safety question as defined in 10 CFR 50.59.
- c. Provide written notification within 24 hours to the Chief Nuclear Officer and the Corporate Nuclear Safety Review Board of disagreement between the POC and the Plant General Manager; however, the Plant General Manager shall have responsibility for resolution of such disagreements pursuant to Technical Specification 5.1.1.

2.1.7 The POC shall maintain written minutes of each POC meeting that, at a minimum, document the results of all POC activities performed under the responsibility provisions of these Specifications. Copies shall be provided to the Chief Nuclear Officer and the Corporate Nuclear Safety Review Board.

## 2.2 CORPORATE NUCLEAR SAFETY REVIEW BOARD (CNSRB)

2.2.1 The CNSRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering, and
- h. Quality Assurance practices.

The CNSRB shall report to and advise the Chief Nuclear Officer on those areas of responsibility in Appendix III, 2.2.7 and 2.2.8.





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- 2.2.2 The CNSRB shall be composed of nine members appointed in writing by the Chief Nuclear Officer from his senior technical staff and/or from outside the Supply System. He shall designate from the members a Chairman and an Alternate Chairman. The qualifications of all members shall meet the minimum requirements of Section 4.7 of ANSI/ANS 3.1-1981 and have, cumulatively, expertise in the areas listed in Appendix III, 2.2.1, as a minimum.
- 2.2.3 All alternate members shall be appointed in writing by the CNSRB Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in CNSRB activities at any one time.
- 2.2.4 Consultants shall be utilized as determined by the CNSRB Committee to provide expert advice to the CNSRB.
- 2.2.5 The CNSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.
- 2.2.6 The quorum of the CNSRB necessary for the performance of the CNSRB review and audit functions of these specifications shall consist of the Chairman or the alternate Chairman and at least four CNSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.
- 2.2.7 The CNSRB shall review:
- a. The safety evaluations for (1) changes to procedures, equipment or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
  - b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
  - c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
  - d. Proposed changes to Technical Specifications or the Operating License;



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- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instruction having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the POC.
- j. Audit reports and summary reports of audits.

**2.2.8 Audits of unit activities shall be performed under the cognizance of the CNSRB. These audits shall encompass:**

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months;
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, at least once per 6 months;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, at least once per 24 months;
- e. The fire protection programmatic controls including the implementing procedures at least once per 24 months by qualified licenses QA personnel;
- f. The Emergency Plan and implementing procedures at least once per 12 months per 10 CFR 50.54(t).



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- g. The Security Plan and implementing procedures at least once per 12 months.
- h. The fire protection equipment and program implementation, at least once per 12 months utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least once every third year; and
- i. Any other area of unit operation considered appropriate by the CNSRB or the Chief Nuclear Officer.
- j. The radiological environmental monitoring program and the results thereof at least once per 12 months.
- k. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures at least once per 24 months.
- l. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes at least once per 24 months.
- m. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring at least once per 12 months.

**2.2.9 Records of CNSRB activities shall be prepared, approved, and distributed as indicated below:**

- a. Minutes of each CNSRB meeting shall be prepared, approved, and forwarded to the Chief Nuclear Officer 14 days following each meeting.
- b. Reports of reviews encompassed by Appendix III, 2.2.7 above, shall be prepared, approved, and forwarded to the Chief Executive Officer within 14 days following completion of the review.
- c. Audit reports encompassed by Appendix III, 2.2.8 shall be forwarded to the Chief Nuclear Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit.



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### 3.0 PROCEDURES AND PROGRAMS

- 3.1 Each procedure of Technical Specification 5.4.1, and changes thereto, shall be reviewed by the POC and shall be approved by the Plant General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.
- 3.2 Temporary changes to procedures of Technical Specification 5.4.1a. through e. may be made provided:
  - a. The intent of the original procedure is not altered;
  - b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on the unit affected; and
  - c. The change is documented, reviewed by the POC, and approved by the Plant General Manager within 14 days of implementation.

### 4.0 RECORD RETENTION

A Records Disposition Program was established to manage the identification, retention, retirement and disposal of Supply System records and documents. Refer to the Records Disposition Program to insure compliance with various Federal and Washington State record retention requirements.

- 4.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.
- 4.2 The following records shall be retained for at least 5 years:
  - a. Records and logs of unit operation covering time interval at each power level.
  - b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.
  - c. ALL REPORTABLE OCCURRENCES submitted to the Commission.
  - d. Records of surveillance activities, inspections, and calibrations required by the Plant Technical Specifications.

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- e. Records of changes made to the procedures required by Technical Specification 5.4.1.
- f. Records of radioactive shipments.
- g. Records of sealed source and fission detector leak tests and results.
- h. Records of annual physical inventory of all sealed source material of record.

4.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report (FSAR).
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of radiation exposure for all individuals entering radiation control areas.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Technical Specification 5.5.5.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to the Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual not listed in Appendix III, 4.2.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the POC and the CNSRB.

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- l. Records of the service lives of all hydraulic and mechanical snubbers required by WNP-2 Snubber Program including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analysis required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- n. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

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