

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

APPROVED: \_\_\_\_\_  
*Manager, Quality* *Date Effective*

REVISION NO. 26

ORIGINAL ISSUE: May 10, 1978



WASHINGTON PUBLIC POWER  
SUPPLY SYSTEM

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## OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION

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 Operations Committee (see Appendix III) 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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**2 - QUALITY ASSURANCE (QA) PROGRAM**

- 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:
- 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).
  - 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.
  - 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.





# **OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION**

**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				
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 (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-03	Restricted Use Equipment List (RUEL)				X			X											
SWP-PUR-05	Emergency Purchasing				X			X											
SWP-MMP-01	Control of Ageable Items													X					
SWP-MMP-02	Warehousing							X						X					
SWP-MMP-03	Packaging and Shipping of Material and Equipment							X						X					
SWP-ASU-01	Evaluations of Programs, Processes and Suppliers	X														X	X		X
SWP-FPP-01	Nuclear Fire Protection Program	X	X	X	X	X		X			X	X			X	X	X	X	X
SWP-IRP-02	Corporate Nuclear Safety Review Board	X																	X





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APPENDIX I

QUALIFICATION REQUIREMENTS

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 specified below.


- I.1 The Manager, Quality or the Supervisor, Quality Services fulfills the position described in ANSI/ANS-3.1-1978, Section 4.4.5, Quality Assurance. The qualifications for this position are:
- a. Education: Bachelors Degree or equivalent\* in Engineering or related science.
  - b. Six (6) years experience in the field of quality assurance, or equivalent number of years of nuclear industry experience in a supervisory/management position or a combination of the two. At least two (2) years of these six years experience shall be nuclear power plant experience in the overall implementation of the quality assurance program. (This experience shall be obtained within the quality assurance organization.)
- I.2 Quality Programs Supervisor
- 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.

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\*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 Department, 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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### II.4 REGULATORY GUIDE 1.30, (Safety Guide 30, August 11, 1972) - "Quality Assurance Requirements for the Installation, Inspection and Testing of Instrumentation and Electric Equipment"

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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## **II.6 REGULATORY GUIDE 1.37, (March 16, 1973) - "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants"**

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 cleanliness 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 cleanliness requirements, will be developed on case by case basis for maintenance and modification work to be performed.



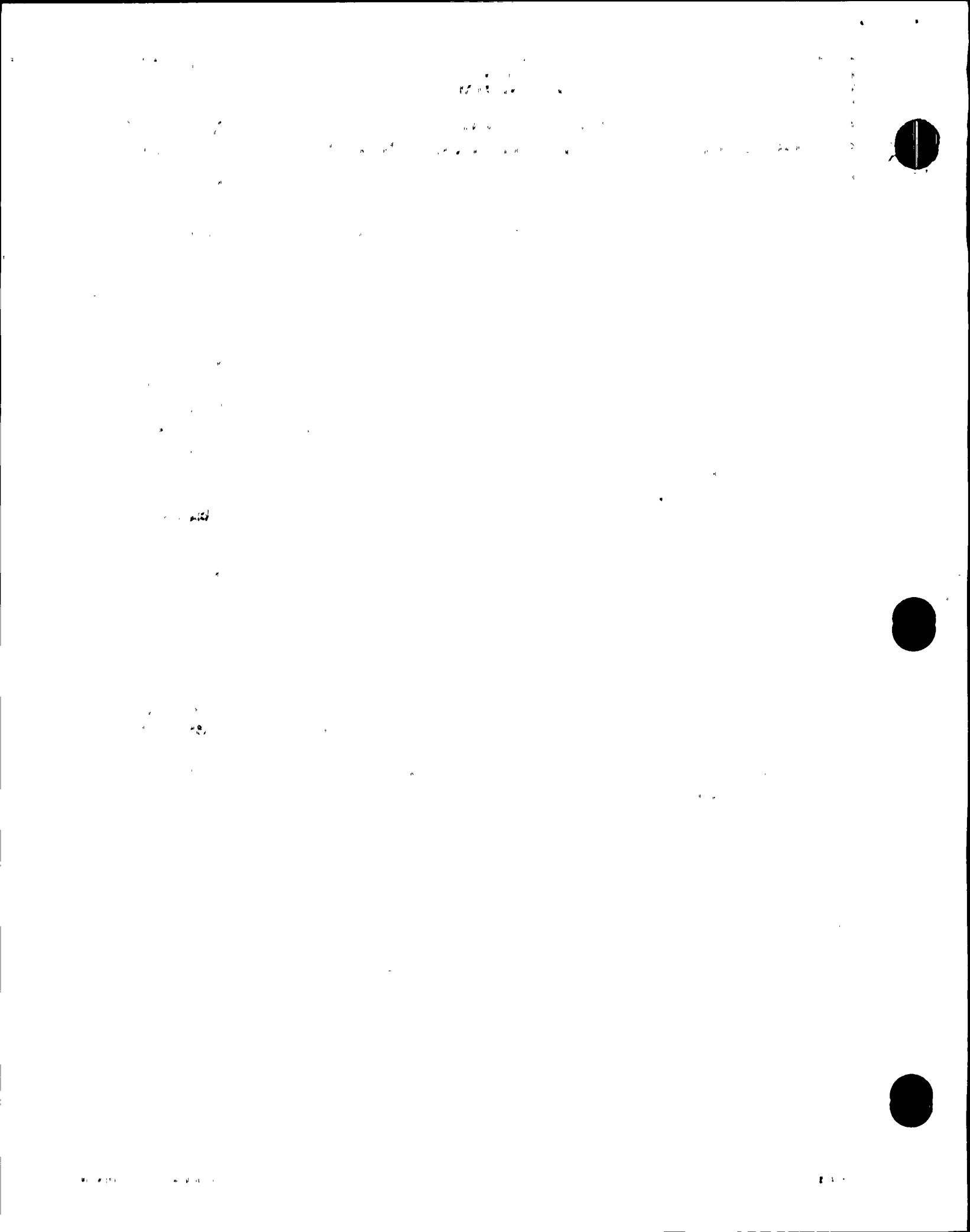
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The Supply System will implement the Regulatory Position of Regulatory Guide 1.58, Rev. 1 (September 1980), subject to the following:

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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II.11 REGULATORY GUIDE 1.74 (February 1974) - "Quality Assurance Terms and Definitions"

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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II.13 REGULATORY GUIDE 1.94, REV. 1 (April 1976) - "Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Steel During the Construction Phase of Nuclear Power Plants"

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.







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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.



**OPERATIONAL  
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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 individuals experienced in one of the following functional areas:

Operations	Administrative Services
Maintenance	Radiation Protection
Engineering	Technical Services
Quality	Chemistry
Planning/Scheduling/Outage	

2.1.2 The Plant General Manager, the POC Chairman, shall appoint, in writing, the POC Vice Chairman, and individual members. The qualifications of all members shall meet the requirements of ANSI/ANS-3.1-1981, Section 4.7, and have, cumulatively, expertise in the areas listed in 2.1.1, as a minimum.

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

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

2.1.5 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.

2.1.6 The POC shall be responsible for:

- a. Review of 10CFR50.59 Safety Evaluations associated with procedures and programs required by Technical Specification 5.4 and changes thereto.
- 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 submittal of recommended changes to the Corporate Nuclear Safety Review Board;
- j. Review of the Emergency Plan 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.

### 2.1.7 The POC shall:

- a. Recommend in writing to the Plant General Manager approval or disapproval of items considered under Appendix III, 2.1.6a. 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, 2.1.6a. 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.

2.1.8 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 at least nine and no more than twelve 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. The quorum shall consist of not less than the majority of the members, or duly appointed 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;

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- d. Proposed changes to Technical Specifications or the Operating License;
- 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;

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- f. The Emergency Plan and implementing procedures at least once per 12 months per 10 CFR 50.54(t).
- 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 within 15 working 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 15 working days following completion of the review.

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- 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.

**3.0 PROCEDURES AND PROGRAMS**

- 3.1 Each procedure of Technical Specification 5.4.1, and changes thereto, shall be reviewed and approved as specified by Appendix III, 4.0, 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 these individuals shall be the supervisor in charge of the shift and holds a Senior Operator license on the unit affected; and
  - c. The change is documented and reviewed by the appropriate member(s) of Plant management, within 14 days of implementation.

**4.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES**

- 4.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).
- 4.2 Each program and procedure required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two technical reviewers; i.e., the procedure sponsor and a Qualified Procedure Reviewer who are knowledgeable in the affected functional area. The Qualified Procedure Reviewer, or procedure sponsor shall determine the need for cross disciplinary reviews. All required cross-disciplinary reviews of new procedures, procedure revisions or changes thereto shall be completed prior to approval.



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- 4.3 Qualified Procedure Reviewer(s) shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for applicable positions, with the exclusion of the positions identified in Section 4.3.2 and 4.5. Individuals whose positions are described in Section 4.3.2 and 4.5 may qualify as qualified procedure reviewers provided they meet the qualification described in other portions of Section 4.
- 4.4 Each program and procedure required by Technical Specification 5.4 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed to determine if a 10 CFR 50.59 Safety Evaluation is required. Safety evaluations, when required, shall be reviewed by POC per OQAPD, Appendix III, 2.1.6.a.
- 4.5 Nuclear safety related procedures and procedure changes shall be reviewed and approved, prior to implementation, by the appropriate member(s) of management, as determined by the Plant General Manager.
- 4.6 All changes to the Process Control Program (PCP) and the Offsite Dose Calculation Manual (ODCM) shall be reviewed by POC and accepted by the Plant General Manager prior to implementation.

**5.0 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.

- 5.1 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.
- 5.2 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.





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- d. Records of surveillance activities, inspections, and calibrations required by the Plant Technical Specifications.
- 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.

### 5.3 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, 5.2.



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- 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.
- 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.

