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COLEMAN,D.W. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Informs that util intends to implement rev 26 to operational QA program description,including clarifications requested by NRC to App III.Proposed clarification to QA plan does not represent unreviewed safety question.

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P.O. Box 968 • Richland, Washington 99352-0968

November 24, 1997
GO2-97-211

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21**
PROPOSED REVISION 26 TO OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004)

The Supply System forwarded to the NRC our proposed revision 26 to the Operational Quality Assurance Program Description (OQAPD) by letter GO2-97-124 of June 18, 1997. On August 16, 1997, the Supply System received a facsimile transmission from Mr. T. G. Colburn (NRC) requesting a clarification on the proposed revision. During discussions with the NRC on August 24 and October 8, 1997, agreement was reached on the 10 questions listed in the facsimile. This letter forwards the Supply System's clarifications to three paragraphs in revision 26 to the OQAPD, Appendix III.

A description for each of the clarifications and paragraphs that were modified in accordance with our agreement is provided in Attachment 1 of this submittal. This includes both the clarifications and the original wording to Appendix III.

The proposed clarification has been evaluated in accordance with 10 CFR 50.59 and the Supply System has concluded that the proposed clarification to the OQAPD does not represent an unreviewed safety question.

The Supply System intends to implement the OQAPD revision 26, including the clarifications requested by the NRC to Appendix III. Since no comments were received about Appendix I, it also will be implemented.

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Should you have any questions or desire additional information regarding this matter, please call me or D.K. Atkinson at (509) 377-4302.

Respectfully,

D. W. Coleman

D. W. Coleman
Acting Manager, Regulatory Affairs
Mail Drop PE20

Attachment

cc. EW Merschoff - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
TG Colburn - NRR
NRC. Sr. Resident Inspector - 927N
DL Williams - BPA / 399
PD Robinson - Winston & Strawn

OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION PROPOSED REVISION 26, DESCRIPTION OF CHANGES AND JUSTIFICATION

The following clarifications were added to the OQAPD, Appendix III.

1. Paragraph 2.2.9.a. was added. It states, "Items identified at each CNSRB meeting that require actions shall be identified and tracked. These actions shall be resolved in a time frame commensurate with their importance to safety."

2. Paragraph 4.2 was clarified by adding a sentence, "The Qualified Procedure Reviewer shall not be the individual who prepared the procedure or procedure change."

3. Paragraph 4.4 was clarified by adding two sentences, "This review shall be accomplished by two individuals who are knowledgeable in the affected functional area. These individuals shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for the applicable positions."

The following information is provided to address the changes proposed in revision 26.

The time frame for issuing CNSRB meeting minutes and reports is being changed from 14 calendar days to 15 working days. With the new paragraph 2.2.9.a. we have included a requirement to identify, track and take action on those items that need resolution. These items will be resolved in a time frame commensurate with their importance to safety. This assures that the "Important" items are acted on in an expedient fashion. The meeting minutes and reports of reviews by CNSRB document their reviews.

Currently, the requirements for Licensing Basis Impact Determination (LBID) reviewer are included in a procedure that is approved by the Plant General Manager and Plant Operations Committee (POC). The procedure establishes the requirements and describes the processes for 1) evaluating the impact on the WNP-2 licensing basis from various activities associated with the design and operation of the plant, 2) determining whether proper NRC approval is required before implementing activities which will result in changes to the facility, its procedures or licensing basis documents, or before conducting tests and experiments, and 3) determining whether the proposed change will result in an Unreviewed Environmental Question (UEQ) or an Unreviewed Safety Question (USQ). Individuals who perform this review are required to attend a training class, and after satisfactory completion, are certified by their manager/supervisor as a qualified LBID Preparer/Reviewer.

The controls that the Supply System will implement for those situations in which the Plant General Manager elects to delegate his signature authority for the approval of procedure changes will be placed in a Site Wide Procedure. Site Wide Procedures are approved by the

Chief Nuclear Officer and the Plant General Manager. See OQAPD Section 2 - Quality Assurance Program for a description of the Site Wide Procedures. The Site Wide Procedure will include:

- The approving authority for procedures.

- Responsibilities for the procedure approving authority.

Qualification of the approving authority will be based on the position the individual holds, i.e. Maintenance Manager, Operations Manager, Technical Manager, Radiation Protection Manager, Chemistry Manager, etc.

The clarifications noted in this letter are additions to proposed revision 26 to the OQAPD. These clarifications are still bounded by the original proposed revision. These clarification are not new reductions in commitments. All reductions in commitments have been identified in Supply System letter of June 18, 1997.

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.

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;

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.

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.

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;

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;

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. Items identified at each CNSRB meeting that require actions shall be identified and tracked. These actions shall be resolved in a time frame commensurate with their importance to safety.

b. Minutes of each CNSRB meeting shall be prepared, approved, and forwarded to the Chief Nuclear Officer within 15 working days following each meeting.

c. 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.

d. 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 shall not be the individual who prepared the procedure or procedure change. 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.

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 4.3.1 and 4.5. Individuals whose positions are described in Section 4.3.1 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. This review shall be accomplished by two individuals, who are knowledgeable in the affected functional area. These individuals shall meet or exceed the qualifications described in Section 4 of ANSI N18.1-1971 for the appplicable positions. 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 and as specified in Administrative Control Procedures.

4.6 All changes to the Process Control Program (PCP) and the Offsite Dose Calculation Manual (ODCM) shall be reviewed by POC and approved 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.

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.

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.