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**SUBJECT:** Provides supplemental info & clarification of proposed Rev 29 to operational QA program description.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

December 9, 1998  
GO2-98-207

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 29 TO THE OPERATIONAL QUALITY  
ASSURANCE PROGRAM DESCRIPTION (WPPSS-QA-004) -  
SUPPLEMENTAL INFORMATION**

Reference: Letter GO2-98-181, dated October 23, 1998, DW Coleman (SS) to the NRC,  
"Revision 28 and Proposed Revision 29 to the Operational Quality Assurance  
Program Description (OQAPD) (WPPSS-QA-004)"

The purpose of this letter is to provide supplemental information and clarification of the proposed Revision 29 to the OQAPD submitted in the reference letter. As a result of discussions between NRR staff and the Supply System on November 19 and 23, 1998, Section 15.2.4 and Appendix II.12.4 were revised. Also, as you requested, additional information describing the changes made to Section 4.2.6 and Appendix III.2.1.1 is included in Attachment 1 to this letter. The changes made to Section 15.2.4 and Appendix II.12.4 are provided as Attachment 2 and should replace respective pages provided in the original submittal dated October 23, 1998.

It is our understanding that you have no further questions concerning Revision 29 to the OQAPD. Accordingly, WNP-2 will be implementing Revision 29 as submitted on October 23, 1998 and modified by this letter, as allowed by 10 CFR 50.54(a)(3).

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PROGRAM DESCRIPTION (WPPSS-QA-004) - SUPPLEMENTAL INFORMATION

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

Respectfully,

*D.W. Coleman*

DW Coleman  
Manager, Regulatory Affairs  
Mail Drop PE20

Attachments

cc: EW Merschoff - NRC RIV  
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## **OPERATIONAL QUALITY ASSURANCE PROGRAM DESCRIPTION PROPOSED REVISION 29 - ADDITIONAL INFORMATION**

### **Attachment 1**

#### **Section 4 - Procurement Document Control**

Section 4.2.6 was revised to clarify how Quality Department personnel review procurement documents. The responsibilities of Quality personnel as related to Procurement Document Control are stated in Section 1.3.3.1.3. The review of procurement documents by Quality Department personnel will be on a sampling basis (not a 100% review). This change removes the Quality Department from in-line review so as to maintain independence. Procurement documents will continue to be reviewed by independent Procurement personnel to assure quality requirements are correctly stated, that products or services be inspected and controlled, and that the vendor is on the current Supply System Evaluated Supplier List. Procurement personnel are trained for this review as stated in Section 2.2.5. Procurement personnel, through the use of the Corrective Action Program, have an avenue to report problems to the Manager, Quality.

#### **Section 15 - Nonconforming Materials, Parts, or Components**

Section 15.2.4 was revised to clarify that Quality Department personnel review nonconformances on a sampling basis (not a 100% review). The purpose to this change is to remove Quality from in-line review so as to maintain independence. An additional clarification was added to state, "The organization responsible for the Corrective Action Program reviews nonconformance reports to assure dispositions have been evaluated and approved."

#### **Appendix II - Position Statements**

Appendix II.12.4 was added to clarify how "Inprocess" Quality Assurance records may be maintained in temporary storage until transferred to the permanent plant file.

#### **Appendix III - Additional Quality Program Requirements**

Appendix III.2.1.1, was revised to eliminate the Planning/Scheduling/Outage (PSO) representation on the Plant Operations Committee (POC). This position (PSO Manager) has been combined into the Maintenance Organization by a recent reorganization. This change is consistent with the WNP-2 Technical Specification Section 6.5.1.2 (prior to relocation of POC requirements from Technical Specifications to the OQAPD).



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- 15.2.4 Nonconforming items shall be reviewed and accepted for use-as-is, rejected, repaired, or reworked in accordance with documented procedures/instructions. The Supply System Quality organization shall review nonconformances on a sampling basis, during audits or surveillances or other reviews to assure that dispositions have been evaluated and approved. The organization responsible for the Corrective Action Program reviews nonconformance reports to assure dispositions have been evaluated and approved.
- 15.2.5 Acceptability of repaired, reworked and replaced item shall be verified and documented by inspecting and/or testing the item in accordance with original inspection and/or test requirements or approved alternatives.
- 15.2.6 Where feasible, nonconforming items shall be segregated from other acceptable items and/or uniquely identified as nonconforming until properly dispositioned for use.
- 15.2.7 Reports of nonconformances shall be periodically analyzed by the Supply System Quality organization to identify quality trends. Significant results shall be referred to appropriate management for review and assessment.



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4. Section 5.2 of ANSI N45.2.9 - 1974 is revised by adding a new second paragraph as follows:

In process Quality Assurance records may be maintained in temporary storage with the originating organization until transfer to the permanent plant file. Written storage procedures shall be prepared and a custodian designated with the responsibility to enforce the procedures. Storage procedures shall, at a minimum, address the following:

- a. Identification of the records that may be maintained in temporary storage, the type of storage (single or dual) and the record storage location.
- b. Use of lockable temporary storage containers with a minimum one hour fire rating and an Underwriters' Laboratory (UL) label (or equivalent). If the container does not have a fire rating label, the container should be certified by an individual competent in the field of fire protection.
- c. Use of "out" cards or other similar methods to track records removed from the file.
- d. Designation of a custodian with the authority to enforce the storage procedures.
- e. Provisions shall be made in the storage arrangement to prevent damage from condensation.
- f. Records shall not be stored loosely. Records shall be firmly attached in binders or placed in folders or envelopes for storage on shelving in containers. Steel file cabinets are preferred.
- g. 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 shall be delineated in procedures and/or instructions which will incorporate, or take into consideration, available manufacturers' recommendations.



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