



Washington Public Power Supply System
A JOINT OPERATING AGENCY

P. O. Box 966 3000 GEO. WASHINGTON WAY RICHLAND, WASHINGTON 99352 PHONE (509) 375-5000

September 10, 1979

Mr. W. P. Haass, Chief
Quality Assurance Branch
Division of Project Management
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: OPERATIONAL QUALITY ASSURANCE PROGRAM
DESCRIPTION (WPPSS-QA-004)

Reference: WP Haass, letter to DL Renberger, dated
5/1/79, same subject.

Dear Mr. Haass:

Attached for your information are 10 copies of our response
to the Regulatory Staff Positions which were enclosed with
your letter of May 1, 1979.

Our Operational Quality Assurance Program Description (WPPSS-QA-004)
is presently being reviewed as part of an annual update program. The
attached responses will be incorporated in a general amendment, scheduled
for completion by the end of December 1979. Twenty-five (25) copies of
the amendment will be submitted at that time.

Very truly yours,

D. L. RENBERGER
Assistant Director-Technology

DLR:FJ:ds

Attachments

cc: MD Lynch-U.S. NRC

343115

Q002
S/1
ADD
LPR 11

7909140 330

Q. 421.50 (3)

The responsibilities of the verifier, the areas and features to be verified, the pertinent considerations to be verified, and the extent of documentation should be identified in procedures. Please modify Section 3.3.3 to address this position.

Response:

The responsibilities of the verifier and the extent of design documents and characteristics to be verified will be covered by the cognizant division/department procedures. Section 3 of the Operational Quality Assurance Program Description will be revised to incorporate this position.

Q. 421.51 (3)

The following provisions should be included if the verification method is only by test:

- a. Procedures provide criteria that specify when verification should be by test.
- b. Prototype, component, or feature testing is performed as early as possible prior to installation of plant equipment, or prior to the point when the installation would become irreversible.

Please modify Section 3.3.3 to address this position.

Response:

The test program, if used, to verify the adequacy of a specific design feature, shall be controlled in accordance with the applicable provisions of Section 11 of the Operational Quality Assurance Program Description. Such testing will be performed in accordance with established criteria and prior to relying upon the component, system or structure to perform its safety function. Section 3 will be revised to incorporate this position.

Q. 421.52 (3)

Procedures should be established to assure that verified computer codes are certified and specified for a particular use. Please modify Section 3.3.5 to address this position.

Response:

To assure the design adequacy, the design documents shall be internally reviewed by the organization initiating the design. During this review process, particular attention shall be given to assure that qualifying information for computer codes is provided. Section 3 of the Operational Quality Assurance Program Description will be revised to incorporate this position.

Q. 421.53 (3)

Delete Section 3.3.6 as the requirements of 10 CFR 50.59 are covered in Section 6, "Administrative Controls" of the Standard Technical Specifications.

Response:

Section 3.3.6 will be deleted from the Operational Quality Assurance Program Description.

Q. 421.54 (7)

Procurement of spare or replacement parts for structures, systems, and components important to safety should be subject to present QA program controls, to codes and standards, and to technical requirements equal to or better than the original technical requirements, or as required to preclude repetition of defects. Please modify Section 7.5.4 to address this position.

Response:

Spare/replacement parts, other than commercial grade/off-the-shelf parts, for safety-related structures, systems, and components, shall be subject to the quality assurance program controls and to technical requirements at least equal to the original technical requirements or to revised controls that have been properly reviewed and approved so as to preclude repetition of defects. Section 7 of the Operational Quality Assurance Program Description will be revised to incorporate this position.

Q. 421.55 (9)

In Section 9, describe the criteria for determining those processes that are controlled as special processes.

Response:

Special processes are those operations that require interim inprocess controls such as controlled conditions, utilization of qualified procedures, personnel, and equipment, in addition to final inspections. Section 9 of the Operational Quality Assurance Program Description will be revised to incorporate this definition of Special Processes.

Q. 421.56 (12)

Organizational responsibilities should be described for establishing, implementing, and assuring effectiveness of the calibration program. Please modify Section 12 to address this position.

Response:

The organizational responsibilities for establishing and implementing the calibration program are described in Section 12.2.4. Compliance with the calibration program will be verified through performance of audits/surveillances by the Quality Assurance staff as described in Sections 10 and 18 of the Operational Quality Assurance Program Description.