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10 CFR 50.54

March 26, 1991

U. S. NUCLEAR REGULATORY COMMISSION  
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Washington, D.C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
SUBMITTAL OF QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGES  
FINAL SAFETY ANALYSIS REPORT (FSAR), SECTION 1.8  
POINT BEACH NUCLEAR PLANT - UNITS 1 AND 2

In accordance with the requirements of 10CFR50.54 (a)(3), Wisconsin Electric Power Company is submitting the latest revisions to Section 1.8 of the Final Safety Analysis Report (FSAR) for Point Beach Nuclear Plant (PBNP). Section 1.8 of the FSAR describes the present Quality Assurance Program implemented for PBNP. This section was last submitted to the NRC on June 19, 1990 and subsequently accepted in NRC letter dated August 10, 1990. Changes to the program description since that time are highlighted in the attachment and address issues discussed in our letter dated March 7, 1991 regarding a Notice of Deviation.

None of the changes are considered to be reductions in quality assurance program commitments as previously approved by the NRC. These changes are listed and summarized in Attachment A to this letter.

To avoid misunderstanding, please note that the enclosed Section 1.8 pages do not include a revision number even though changes are highlighted in the text. The revision numbers will be incorporated into the planned upcoming reissuance of the entire FSAR. Since we intend to include these Section 1.8 changes in the FSAR update to be printed this June, your timely review of this information would be appreciated.

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A subsidiary of Wisconsin Energy Corporation

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March 26, 1991  
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If you have any questions regarding the above discussion or the attached information, please contact Mr. G. M. Krieser at (414) 221-2810.

Very truly yours,



C. W. Fay  
Vice President  
Nuclear Power

Attachments

Copies to NRC Resident Inspector  
NRC Regional Inspector, Region III

ATTACHMENT A

FSAR 1.2 CHANGES - 1991 UPDATE

1. Page 1.8-1, 2nd paragraph - Second sentence was split with clarification added.
2. Page 1.8.3, Organization, 1st paragraph - Editorial change for clarity.
3. Page 1.8-4, Paragraph 2 - "Manager - Point Beach Nuclear Plant" was changed to "Manager - Nuclear Operations", to reflect current organization and new titles. Any further references to this position throughout Section 1.8 have also been changed.
4. Page 1.8-4, Paragraph under Manager - Nuclear Operations - Deleted references to QA Coordinator (QAC) and QA Representatives. These changes result from an evolution in quality assurance organizational functions. In April 1989, a Site Quality Assurance Group was established. At that time, some of the functions previously performed by the QAC and QA Representatives were transferred to the Site QA (SQA) group. Since that time, other functional changes have occurred and currently all quality assurance functions previously performed by the QAC and QA Representatives are now performed by SQA. We have, therefore, found it unnecessary to maintain the QAC and QA Representative assignments.
5. Page 1.8-4 - Deleted sections on responsibilities and duties of the QA Coordinator and QA Representatives. See Item #4 above for explanation. Also, Figure 1.8-2 has been updated to reflect this change.
6. Page 1.8-4, Paragraph under Manager - Quality Assurance - Paragraph revised to reflect changes in organization and titles.
7. Page 1.8-4, Site QA, Item 2 - "Plant" changed to "all NPD" for clarity.
8. Page 1.8-4 through 1.8-6 - Changes made to reflect organizational title changes and to update functions performed by each group.
9. Page 1.8-6, OSRC - 3rd sentence was changed to coincide with the wording in the OSRC section of the PBNP Technical Specifications and to correct the associated paragraph reference.

10. Page 1.8-6 - 1st paragraph of 1.8.2 - Paragraph changed to identify procedures manuals to be used in conjunction with the new NPD organization. The "NE" Administration Manual will be revised to the "Nuclear Services (NS)" Administration Manual. Also added reference to the "QA Section Instructions" manual.
11. Page 1.8-6, Item 1 - Editorial change
12. Page 1.8-7, Item 2 - Item changed to reflect a streamlined approval process for Quality Procedures.
13. Page 1.8-7, Item 3 - Editorial change.
14. Page 1.8-7 - Item 4 - This item was added to address approval and control practices for section-specific procedures/instructions.
15. Page 1.8-7, Last paragraph - Changes in this paragraph are for clarification purposes. Various sources are available and used for QA-scoping and classification.
16. Page 1.8-9, 2nd Paragraph - Editorial change.
17. Page 1.8-9, 3rd Paragraph - Balance of paragraph changed to reflect current practice. Housekeeping inspections are an ongoing activity and a function of all plant management, not just the Manager - Nuclear Operations (previously stated as Manager - PBNP).
18. Page 1.8-10, Procurement Document Control - 1st paragraph - Sentence revised for clarification.
19. Page 1.8-10 - The word "Council" was changed to "Committee" to reflect a name change in the joint utility (NUPIC) group.
20. Page 1.8-11, 2nd paragraph - Editorial change.
21. Page 1.8-11, 2nd last paragraph "Reactor Engineering" was changed to read "Technical Services" to reflect current organizational title.
22. Page 1.8-11, Last sentence - Editorial change.
23. Page 1.8-12, 2nd paragraph - Deleted "These provisions are also used as a basis for auditing the document control system" since auditing of document control is clearly covered by the internal audit program and is not intended to be detailed in the program description.

24. Page 1.8-13, 2nd paragraph - Last sentence of paragraph changed to correct a clerical error.
25. Page 1.8-15, 1st paragraph - Deleted: "Quality control inspections may be performed by a workman's first line supervisor, however, quality assurance acceptance is not performed by the first line supervisor or anyone reporting to him". This was considered to be contradictory and less restrictive than commitment in paragraph 3 on Page 1.8-16. It is intended that QC be performed by someone independent of the work being performed.
26. Page 1.8-15, Bottom of page - Clarification to better reflect actual practice.
27. Page 1.8-19, Section 1.8.17, 3rd paragraph - Sentence revised for clarification.
28. Page 1.8-20 - Reflects change from "Energy Information Center" to "Point Beach Energy Center" throughout Section 1.8.17.
29. Page 1.8-20, 3rd paragraph - Changed to more accurately describe the records storage facility door and conduit penetrations into the room.
30. Page 1.8-20, last paragraph - "PBNP" added for clarification.
31. Page 1.8-21, 1st Paragraph - Added new paragraph to further describe the current QA audit program, particularly implementation of performance-based techniques.
32. Page 1.8-21, Last paragraph - Paragraph revised to reflect current practice. The scope of audits performed by the Quality Assurance Section has been increased considerably. Techniques such as performance based approaches and inclusion of technical inputs have replaced the need for "technical" audits as previously defined. Surveillances are typically performed to supplement the audit process.
33. Table 1.8-1 - Editorial changes were made throughout the table to change "Point Beach" to "Wisconsin Electric" to encompass the commitments to the company as a whole versus only PBNP.
34. Table 1.8-3 - Footnote changed to reflect new section title.
35. Figure 1.8.1 - This figure revised to reflect recent changes in the Company (WE) organization. No major structural changes.



36. Figure 1.8.2 - Effective February 1, 1991, the Nuclear Power Department (NPD) was reorganized. At that time, the Senior Manager - Nuclear Engineering was promoted to Director - NPD. Reporting to him is the Nuclear Operations Section and three Nuclear Services (NS) Sections, specifically Nuclear Engineering, Nuclear Technical Services, and Nuclear Planning and Support. The Quality Assurance Section continues to report directly to the Vice President, NPD providing independence from the other functional sections. This reorganization provides for improved consolidation of functions performed in the department and places added emphasis on functions such as planning, modification engineering, and other engineering support.
37. Figure 1.8.3 - Effective February 1, 1991, the Quality Assurance Section (QAS) was also reorganized. This reorganization resulted in a streamlining of the organization and more efficient consolidation of functions performed by the various groups. One particularly noteworthy aspect of the new structure is that the Site QA group now reports directly to the Manager-QAS.