

WOLF CREEK

NUCLEAR OPERATING CORPORATION

Robert C. Hagan
Vice President Technical Services

November 29, 1994

VT 94-0046

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: Docket No. 50-482: Operational Quality Assurance Program
Change Pursuant to 10 CFR 50.54(a)(3)

Gentlemen:

This letter provides a change to Wolf Creek Nuclear Operating Corporation's (WCNOC) Operational Quality Assurance Program for review and approval. The proposed change revises the responsibility for approval of changes to Updated Safety Analysis Report (USAR) Table 3.2-1, "Classifications of Structures, Components, and Systems." Approval of USAR Table 3.2-1 is currently assigned to the Vice President Plant Operations, the Vice President Technical Services formerly Vice President Nuclear Assurance and the Vice President Engineering. This change would assign the responsibility for approval to the responsible Manager and would be accomplished by governing changes through the USAR revision process.

Pursuant to 10 CFR 50.54(a)(3), this change has been evaluated by WCNOC and has been determined to be a reduction in commitments made in the approved Quality Assurance Program. However, based on that evaluation, WCNOC has also determined the change does not reduce the Quality Assurance Program and the Quality Assurance Program continues to satisfy the criteria of Appendix B of 10 CFR Part 50.

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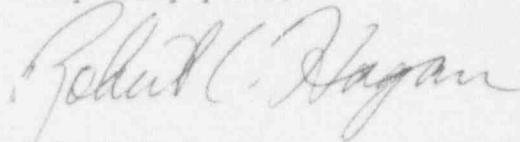
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Pursuant to 10 CFR 50.54(a)(3), a copy of the proposed change to Chapter 17 of the USAR is attached for review (Attachment 1). Attachment 2 is an explanation and justification for the proposed change. If you have any questions concerning this matter, please call me at (316) 364-8831 extension 4553 or Mr. Richard D. Flannigan at extension 4500.

Very truly yours,



Robert C. Hagan

RCH/jra

Attachments

cc: L. J. Callan (NRC), w/a
D. D. Chamberlain (NRC), w/a
J. F. Ringwald (NRC), w/a
J. C. Stone (NRC), w/a

17.2.2.2 Identification of Safety-Related Items

The scope and activity applicability of the Operating Quality Program are described in Section 17.2.0. Safety-related structures, systems, and components are identified in Table 3.2-1. This list includes structures, systems, and components identified as safety-related and may be modified as required, consistent with their importance to nuclear safety. ~~Table 3.2-1 is maintained current by the Vice President Nuclear Assurance with changes to the table being approved by the Vice President Nuclear Assurance, Vice President Engineering, and Vice President Plant Operations.~~ Table 3.2-1 is maintained current through the USAR revision process.

The Operating Quality Program is the governing quality assurance program for safety-related structures, systems, components and consumables. The programs identified under the "Quality Assurance" heading of Table 3.2-1 were those utilized during the design and construction phase. Should safety-related equipment or services be procured from Bechtel, Westinghouse, or others during the operating phase, quality assurance requirements will be determined and imposed in accordance with Sections 17.2.4 and 17.2.7.

Justification for Change to Approval Responsibilities of USAR Table 3.2-1

This change to section 17.2.2.2 of the Operational Quality Assurance Program involves a change to the discussion on maintenance and approval responsibilities for Updated Safety Analysis Report (USAR) Table 3.2-1, "Classification of Structures, Components, and Systems." The responsibility will be transferred from the Vice Presidents to the responsible Manager. Therefore, this change has been determined to be a reduction in commitments made to the approved Operational Quality Assurance Program. The change specifies that the maintenance and control of Table 3.2-1 will be governed by the USAR revision process. The USAR revision process is a procedurally controlled process which requires approval of changes by the responsible Manager.

When the requirements for maintenance and approval of Table 3.2-1 were originally added to the Final Safety Analysis Report, Kansas Gas & Electric Company (KG&E) was responsible for the operation of Wolf Creek Generating Station (WCGS). An architect engineering firm hired by KG&E was responsible for the design of WCGS and for the FSAR revision process. The delegation of responsibility assured KG&E oversight of safety-related equipment. Since that time, Wolf Creek Nuclear Operating Corporation (WCNOC) has been formed and has assumed all responsibilities for the design and operation of WCGS, including the USAR revision process. Therefore, ownership for programs and processes now resides with a single responsible corporation.

Changes made to Table 3.2-1 are generally a result of plant modifications or changes to the list of safety-related, special scope, or non-safety-related plant components (Q-List). Both of these engineering processes have additional review and approval requirements. WCNOC is committed to maintain the Q-List as result of Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events," item 2.1 and item 2.2.1. WCNOC Engineering has the review and approval authority for all changes, additions, and revision to that document. Since Table 3.2-1 was originally the basis for the Q-List and the purpose of the Q-List and Table 3.2-1 are closely related, review requirements should be the same. This change in the approval responsibilities for Table 3.2-1 will be the equivalent to those for the Q-List.

The disparity between the approval process of the Q-List and Table 3.2-1 originated from changes being made to the USAR to reflect organization changes. The approval responsibility was inadvertently moved to upper level management as organization changes were incorporated into the USAR. This change will move the responsibility to the most appropriate management level.

Therefore, this program change continues to meet the criteria of 10 CFR 50 Appendix B, because USAR Table 3.2-1 will be maintained and approved by the appropriate level of management.