DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR (LACBWR) • ROUTE 1, BOX 275
GENOA, WISCONSIN 54632-9738 • (608) 689-2331

NRC Docket No. 50-409

TO: NRC Wash. CONTROLLED DISTRIBUTION NO. 53

FROM: LACBWR Plant Manager April 15, 1997

SUBJECT: Changes to LACBWR Controlling Documents

I. The following documents have been revised or issued new.

LACBWR QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD),
Revision 11

Including also: NRC Letter to DPC, dated April 11, 1997, accepting changes to the QAPD as submitted.

Instructions:
Remove NRC cover letter and replace with new NRC letter dated April 11, 1997.
Insert NRC Safety Evaluation of QAPD change.
Remove and replace Statement of Quality Assurance Policy.
Remove and replace Table of Contents.
Remove and replace all pages of QAPD (pages 1 thru 51).

☒ The material listed above is transmitted herewith. Please verify receipt of all listed material, destroy superseded material, and sign below to acknowledge receipt.

☐ The material listed above has been placed in your binder.

☐ Please review listed material, notify your personnel of changes, and sign below to acknowledge your review and notification of personnel. [To be checked for supervisors for department specific procedures and LACBWR Technical Specifications.]

☐ The material listed above has been changed. [To be checked for supervisors when materials applicable to other departments are issued to them.]

/S/ 250066 DATE _____

Please return this notification to the LACBWR Secretary within ten (10) working days.

Q004 1/1

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 11, 1997

Mr. W. L. Berg
General Manager
Dairyland Power Cooperative
3200 East Avenue S.
P. O. Box 817
LaCrosse, WI 54602-0817

SUBJECT: LA CROSSE BOILING WATER REACTOR - QUALITY ASSURANCE PROGRAM CHANGE (TAC NO. M95503)

Dear Mr. Berg:

By separate letters dated April 10, 1996, Dairyland Power Cooperative (DPC) requested changes to the Quality Assurance Program Description (QAPD) and to the Technical Specifications (TSs) for the La Crosse Boiling Water Reactor. Additional correspondence from DPC, dated July 30, 1996, and November 5, 1996, was submitted to support the requested QAPD changes. These changes were needed to reflect the permanently shutdown and defueled status of the facility. DPC proposed relocating the functional requirements associated with the review and audit, procedures, and record retention sections of the TS to the QAPD. Concurrently, DPC requested TS changes to implement the proposed relocations. The staff has approved both the changes to the QAPD and The TS. Both changes are to be implemented within 30-days of issuance of License Amendment No. 69. The License Amendment approved the TS changes. This letter and enclosed Safety Evaluation serves to approve the changes to the QAPD.

Sincerely,

Morton B. Fairtile

Morton B. Fairtile, Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 50-409

Enclosure: Safety Evaluation

cc w/enclosure:
See next page

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE

DAIRYLAND POWER COOPERATIVE

LA CROSSE BOILING WATER REACTOR

DOCKET NOS. 50-409

1.0 INTRODUCTION

By letter dated April 10, 1996, and as supplemented by letters dated July 30, 1996, and November 5, 1996, Dairyland Power Cooperative (DPC) requested changes to the facility Quality Assurance Program Description (QAPD) and relocation of Technical Specification (TS) Sections, 6.5 "Review and Audit", 6.6 "Procedures", and 6.9 "Record Retention" to the QAPD. These proposed changes reflect the permanently shutdown and defueled status of the facility. Concurrently, DPC requested TS changes to implement the proposed relocations. The new proposed QAPD and the acceptability of the proposed relocations from the TS to the QAPD are evaluated herein. The TS changes are evaluated in License Amendment No. 69 . Both this approval of the changes to the QAPD and the license amendment will be issued on the same date and implemented within 30 days of issuance.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include TS as part of the license. The Commission's regulatory requirements related to the content of TSs are set forth in 10 CFR 50.36. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TSs.

Section 50.36 provides, with respect to limiting conditions for operations (LCO), four criteria to be used in determining whether particular safety functions are required to be included in the TSs. While the four criteria specifically apply to LCOs, in adopting the revision to the rule the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TSs, (60 FR 36958). Addressing administrative controls, 10 CFR 50.36 states that they "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure safe operation of the facility in a safe manner." The specific content of the administrative controls section of the TSs is therefore that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff

has determined that requirements that are not specifically required under §50.36(c)(5) and that are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety can be removed from administrative controls. Existing TSs requirements therefore, may be relocated to more appropriate documents (e.g. Security Plan, Quality Assurance (QA) Plan, and Emergency Plan) and controlled by the applicable regulatory requirement. Similarly, while the required content of TSs administrative controls is specified in 10 CFR 50.36(c)(5), particular details of administrative controls may be relocated to licensee-controlled documents where §50.54, §50.59, or other regulations provide adequate regulatory control.

3.0 EVALUATION

3.1 Technical Specification Changes

By letter dated December 12, 1995, the staff issued NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." AL 95-06 provided information regarding recent experience involving the relocation of TSs administrative controls related to quality assurance. In AL 95-06, the staff compared the content of typical TSs administrative controls related to quality assurance requirements, for those plants that have not converted to the Improved Standard Technical Specifications (ISTS), with established staff positions and recent amendment requests. On the basis of this review, the staff provided several observations in order to assist those licensees considering an amendment request related to quality assurance requirements.

The licensee's April 10, 1996, letter to the NRC, as supplemented on July 30, 1996, and November 4, 1996, proposed to relocate the administrative controls related to TSs 6.5 "Review and audit", 6.6 "Procedures", and 6.9 "Record Retention", to the QAPD.

This change is in accordance with the guidance contained in AL 95-06, which stated that TSs requirements related to review and audit requirements may be relocated to the quality assurance plan. The quality assurance program is a logical candidate for such relocations due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of NRC-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a).

The staff has reviewed the proposed TSs changes and their relocation to the QAPD and has concluded that the current TSs described above are not required by 10 CFR 50.36, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, they do not fall within any of the four criteria set forth in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (Final Policy Statement), 58 Federal Register 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies

Section 182a of the Atomic Energy Act. Accordingly the functions related to review and audit, procedures, and record retention do not need to be controlled by the TSs because an equivalent level of control can be achieved by the QAPD while providing for a more appropriate change control process. Specifically, change control for the relocated TSs provisions, proposed by the licensee from the current TSs to the QA Program, will be provided by 10 CFR 50.54(a). The level of safety of plant operation is unaffected by this change. The change is therefore, acceptable. The following discussions detail the NRC staff's conclusions regarding the relocation of selected Administrative Controls from TSs Sections 6.5, 6.6, and 6.9.

a. TSs 6.5-Review and Audit

DPC proposed to delete TS Section 6.5 "Review and Audit" and to relocate the associated review and audit requirements, with changes, to the QAPD. The proposed changes include replacing the designated review activities contained in TS Section 6.5.2.1, with the general requirement that the Safety Review Committee (SRC) provide independent review and audit of all aspects of plant nuclear safety. DPC also proposed changing the minimum meeting frequency requirements specified in TS Section 6.5.2.5, from "at least once per six months" to "at least once per year" for the SRC. DPC further proposed to redefine SRC member qualification criteria and to allow the selection of SRC members based on that criterion instead of identifying the specific members by position title, as currently specified in TS Section 6.5.2.2. Similarly, DPC proposed replacing the existing TS Section 6.5.1.2 membership requirements associated with the Operations Review Committee (ORC) with less prescriptive functional membership criteria.

Subsequent to the staff's interactions with DPC, the utility submitted clarifications to Revision 11 of their QAPD by letters dated July 30, 1996, and November 5, 1996. The staff has reviewed these clarifications related to the qualifications of the ORC and SRC which define the experience and educational requirements for the members as well as the SRC meeting frequency controls. Based on these reviews the staff has determined that the proposed changes to the QAPD which require that (1) ORC members shall meet the minimum qualifications specified in TS Section 6.3; (2) a majority of the SRC members (i.e., three out of the five individuals) conform to the minimum education and experience requirements specified in Section 4.6 of ANSI N18.1-1971; and (3) that the SRC shall meet at least once per year and as deemed necessary by the SRC chairman or plant manager are acceptable given the current defueled status of the facility.

b. TSs 6.6-Procedures

DPC proposed to relocate selected portions of TS Section 6.6, concerning procedures, to the QAPD. These relocation efforts involve TS Sections 6.6.1, functional areas requiring procedural controls; 6.6.2, review and approval of procedural changes; and 6.6.3, which describes temporary procedure change controls. Based on the staff's review within this area

it was determined that the information previously contained in the identified TS sections was appropriately transferred to the QAPD. The future maintenance of these requirements under the provisions of 10 CFR 50.54(a)(3) will provide controls equivalent to those previously contained in the TS.

c. TSs 6.9-Record Retention

DPC also proposed the relocation of TS Section 6.9 "Record Retention" to the QAPD. As a result of the staff's examination of the relocated section, including the associated subsections, it was determined that the records retention requirements previously contained in the TS were appropriately transferred to the QAPD.

The NRC staff has reviewed the changes to the relocated TSs sections and determined that the incorporation of the changes into the QAPD are acceptable in that the QAPD continues to satisfy the applicable criteria of Appendix B to 10 CFR Part 50. Based on the considerations discussed above and the fact that any subsequent changes to the relocated TSs provisions will be controlled in accordance with 10 CFR 50.54(a), the staff concludes that the revisions to the QAPD, as proposed by letters dated April 10, 1996, as supplemented on July 30, 1996, November 5, 1996, are acceptable.

Given that the requirements in the QAPD implement the Commission's regulations pertaining to the review and audit functions, inclusion of these particular provisions in TSs is not necessary to assure safe operation of the facility. The review and audit functions define an administrative framework to confirm that plant activities have been properly conducted in a safe manner. The reviews and audits serve also to provide a cohesive program that provides senior level utility management with assessments of facility operation and recommends actions to improve nuclear safety and reliability. However, the staff has determined that the review and audit functions are adequately addressed by existing regulations and the related QAPD commitments. Based upon the relocation of the review and audit provisions to the QAPD, it is not necessary to include redundant or additional requirements in the TS administrative controls.

The licensee will continue to implement the QAPD in accordance with the requirements of 10 CFR Part 50, Appendix B, and commitments to ANSI N18.7, which provides appropriate controls for the approval of changes to the functions related to review and audit, procedures, and record retention. Changes to the QAPD are controlled in accordance with 10 CFR 50.54(a) and include requirements for prior NRC review and approval if a change constitutes a reduction in a QAPD commitment. The staff concludes that this regulatory requirement provides sufficient control for the functions related to review and audit, procedures, and record retention, so that removing these requirements from the TSs is acceptable.

4. CONCLUSION

The staff ascertained that the changes to the QAPD are in accordance with the review criteria contained in Section 17.2 of NUREG-0800, the Standard Review Plan (SRP). The staff also concluded that although the licensee's proposed controls for the qualification criteria related to SRC members did not explicitly conform to the acceptance criteria delineated in SRP 13.4 "Operational Review", an equivalent level of independent oversight is provided by the alternative criteria. In conclusion, it is noted that the QAPD changes described in DPC's April 10, 1996, letter and supplemented by correspondence dated July 30, 1996, and November 5, 1996, should be implemented simultaneously with the TS changes authorized by License Amendment No. 69.

Principal Contributor: Robert M. Latta

Date: April 11, 1997

DAIRYLAND POWER COOPERATIVE

LA CROSSE BOILING WATER REACTOR

STATEMENT OF QUALITY ASSURANCE POLICY

The Quality Assurance Program described herein has been developed by Dairyland Power Cooperative (DPC) to assure safe and reliable operation of the La Crosse Boiling Water Reactor (LACBWR) in a SAFSTOR condition. This program is designed to meet the requirements of Title 10 of the Code of Federal Regulations, Part 50, Appendix B, "Quality Assurance Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," as it would apply to a possession-only condition.

The Quality Assurance Program applies to all activities affecting the functions of the structures, systems, and components that are associated with a possession-only license. These activities include design, operations, maintenance, repair, fuel handling, testing and modifications. Design and fabrication of shipping casks used for shipment of radioactive material will not be conducted under this Quality Assurance Program.

The DPC QA Director is responsible for the establishment of a Quality Assurance Program which meets the requirements of 10 CFR 50, Appendix B, and implementation of the program.

William L Berg

(General Manager)

April 16, 1996

(Date)

QUALITY ASSURANCE PROGRAM DESCRIPTION

TABLE OF CONTENTS

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION 0.0 REV. NO. 9 INTRODUCTION DATE 04/12/94 PAGE 1 OF 2
REV'D: [signature] 4-9-96 QA Director Date REV'D: [signature] 4/11/96 Plant Manager Date	APPROVED: [signature] 4/18/96 General Manager Date

0.0 INTRODUCTION

A. General

The La Crosse Boiling Water Reactor (LACBWR) Quality Assurance Program is designed to meet the requirements of 10 CFR 50, Appendix B, and reflects the direction of applicable regulatory guides and industry standards, as they apply to a possession-only condition, thereby assuring that the health and safety of the public is not caused undue risk.

The program described herein is applied by Dairyland Power Cooperative (DPC) to assure safe operation of the LACBWR facility. It applies to those identified structures, systems, and components associated with a safe storage condition. It shall be applied to activities such as design, procurement, modifications, fabrication, installation, maintenance, testing, and fuel handling at the LACBWR plant by DPC or its subcontractors.

Design and fabrication of shipping casks used for shipment of radioactive material will not be conducted under this Quality Assurance Program.

Quality Assurance (QA) as defined herein encompasses all those planned and systematic actions necessary to provide adequate confidence that a component, structure, or system will perform satisfactorily in service. It is recognized as an interdisciplinary function and not the sole responsibility of the Quality Assurance Department.

It is DPC's policy that the group performing and directly responsible for the work, such as engineering, design, procurement, maintenance, and testing is responsible for the quality of work. This includes quality control and verification that their work is performed in accordance with approved documents. The QA Department has responsibility for auditing the other groups and assuring DPC management that the QA Program is being fully implemented.

B. Terms and Definitions

The definitions listed below are used frequently throughout this document.

COMPANY - Dairyland Power Cooperative (DPC)

LACBWR - La Crosse Boiling Water Reactor.

QUALITY ASSURANCE (QA) - All those planned and systematic actions necessary to provide adequate confidence that a structure, system, or component will perform satisfactorily in service.

QUALITY CONTROL (QC) - Those Quality Assurance actions which provide a means to control and measure the characteristics of an item, process or facility to established requirements.

ORC - Operations Review Committee.

FACILITY - Encompasses the site and facility systems which support a possession-only license condition, but excludes electric power transmission apparatus located beyond the site switchyard.

PLANT PROCEDURE - A document describing the manner of conducting an action or process.

ADMINISTRATIVE CONTROL PROCEDURE (ACP) - A document which establishes the guidelines and requirements governing functional activities (i.e., Administration, Material Request, Control Room Log, etc.).

QUALITY ASSURANCE INSTRUCTION (QAI) - A document which establishes the guidelines and requirements governing quality assurance and control activities.

QA MANUAL - Manual comprised of the QA Program Description.

SRC - Safety Review Committee.

QUALITY ASSURANCE PROCEDURE (QUA) - A document which establishes the guidelines and requirements governing the Generation Division quality-related activities.

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION I REV. NO. 11 ORGANIZATION DATE 02/20/96 PAGE 1 OF 8
REV'D: [signature] 4-9-96 QA Director Date REV'D: [signature] 4/11/96 Plant Manager Date	APPROVED: [signature] 4/18/96 General Manager Date

I. ORGANIZATION

A. General Requirements

Figure I shows the organizational structure for the LACBWR facility and establishes the functional lines of authority and responsibility of various groups and individuals participating in the LACBWR QA Program. The authority and duties of persons or groups responsible for the direction, implementation, and auditing of this program are as follows:

1. DPC General Manager has corporate responsibility for all quality assurance matters relating to design, construction, installation, maintenance, and testing of the LACBWR facility. He has delegated the authority and responsibility for administration of quality assurance for LACBWR to the DPC QA Director.

2. LACBWR Plant Manager, who reports directly to the Assistant General Manager, Generation, has on-site responsibility for the possession-only condition of the facility within the limits set forth in the Decommissioning Plan and Technical Specifications. He has responsibility for implementing the quality assurance requirements at the plant, through administrative control procedures and procedures required to fulfill the requirements of this program. All activities pertaining to the LACBWR plant are coordinated through the Plant Manager. Activities performed by outside individuals or groups, including SRC, outside consultants, and representatives of NRC activities with regard to the LACBWR plant are performed under the authority and responsibility of the Plant Manager. The Plant Manager has complete overall technical and administrative control over the groups designated in the organizational chart for the facility.

The Plant Manager directly supervises and coordinates all activities related to possession-only operation and maintenance of the facility through the Shift Supervisors and coordinates the activities of the maintenance departments. The Plant Manager ensures that regular inspections of the facility are performed, and he is responsible for the review of all log sheets, malfunction reports, surveillance, and maintenance records. The Plant Manager is concerned with the detailed operation and maintenance of the facility. The Plant Manager enforces all facility operating and safety procedures and ensures that approved operating and maintenance procedures are followed.

3. A LACBWR Management Representative has responsibility for establishing and implementing a training and requalification program for operators in accordance with applicable regulations.

4. Quality Assurance Director has responsibility for establishing a quality assurance program and performing audits of the program to determine its effectiveness. The Quality Assurance Director has the authority to stop fabrication, installation, or testing of structures, systems, or components which do not conform to specifications or approved procedures.

5. Technical Support Staff consists of on-site and off-site engineers, covering various disciplines, responsible to the Plant Manager. They provide technical services to the Plant Manager in areas of licensing, analyzing test results, design changes, and may, as requested, perform audits to provide assurance that facility activities are being performed consistent with approved procedures and licensing provisions.

6. The Operations Review Committee is an advisory committee to the Plant Manager. They review facility operations and verify implementation of site quality assurance practices. The minutes of the ORC are distributed to the Safety Review Committee.

   a. The Operations Review Committee shall function to advise the Plant Manager on all matters related to nuclear safety.

   b. The Operations Review Committee shall be composed of the following:
   Chairman: Plant Manager
   Members: LACBWR Management Staff and Engineers

c. ORC members shall meet minimum qualifications as specified in Technical Specification 6.3.

d. All alternate members shall be appointed in writing by the ORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in ORC activities at any one time.

e. The ORC shall meet at least once per calendar quarter and as convened by the ORC Chairman or his designated alternate.

f. The minimum quorum of the ORC necessary for the performance of the ORC responsibility and authority provisions shall consist of the Chairman, or his designated alternate, and 3 members, including alternates.

g. The Operations Review Committee shall be responsible for:

(1) Review of [1] all procedures required by Section V of this QAPD and changes thereto, [2] any other proposed procedures or changes thereto as determined by the Plant Manager to affect nuclear safety.

(2) Review of all proposed tests and experiments that affect nuclear safety.

(3) Review of all proposed changes to the Appendix "A" Technical Specifications.

(4) Review of all proposed changes or modifications to facility systems or equipment that affect nuclear safety.

(5) Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the General Manager and to the Safety Review Committee (SRC).

(6) Review of all REPORTABLE EVENTS.

(7) Review of facility operations to detect potential nuclear safety hazards.

(8) Performance of special reviews, investigations or analyses and reports thereon as requested by the Plant Manager or SRC.

(9) Review of the Contingency Plan, the Plant Security Plan, and implementing procedures.

(10) Review of the Emergency Plan and implementing procedures.

(11) Review the waste management process control program, which includes the transportation packaging program.

(12) Review of the Decommissioning Plan.

h. The Operations Review Committee shall:

(1) Recommend in writing to the Plant Manager approval or disapproval of items considered under f (1) through (4) above.

(2) Render determinations in writing with regard to whether or not each item considered under f (1) through (5) above constitutes an unreviewed safety question.

(3) Provide written notification within 24 hours to the General Manager and the SRC of disagreement between the ORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

i. The Operations Review Committee shall maintain written minutes of each ORC meeting that, at a minimum, document the results of all ORC activities performed under the responsibility and authority provisions. Copies shall be provided to the General Manager and the SRC.

7. The Safety Review Committee is an advisory committee responsible to the General Manager for independent reviews and audits to verify that the facility is being maintained consistent with company safety, administrative, and licensing provisions.

a. The Safety Review Committee shall function to provide independent review and audit of all aspects of plant nuclear safety.

b. The SRC shall be composed of a Chairman and a minimum of three members who are appointed by either the Dairyland Power Cooperative (DPC) General Manager or the Assistant General

Manager, Generation. The Chairman shall be appointed by the General Manager. In addition, the Plant Manager is also a member of the SRC. SRC members appointed by the General Manager or Assistant General Manager, Generation, shall not be members of the plant staff.

c. All SRC alternate members shall be appointed in writing by the DPC General Manager or Assistant General Manager, Generation, to serve on a temporary basis; however, no more than two alternates shall participate as voting members in SRC activities at any one time.

d. Membership to the SRC requires that an individual meet one or more of the academic and/or experience requirements listed below. The majority of the SRC members shall meet the requirements of 7.d.(1).

(1) Bachelor Degree in Engineering or the physical sciences, plus five years' total experience in one or more of the below listed disciplines.

(2) Nine years' combined total experience in one or more of the below listed disciplines.

- Nuclear Power Plant Technology
- Facility Operations
- Power Plant Design
- Engineering/Nuclear Engineering
- Radiation Safety
- Safety Analysis
- Instrumentation and Control
- Quality Assurance

e. Consultants shall be utilized as determined by the SRC Chairman to provide expert advice to the SRC.

f. The SRC shall meet at least once per year, and as deemed necessary by the SRC Chairman or the Plant Manager.

g. The minimum quorum of the SRC necessary for the performance of the SRC review and audit functions shall consist of the Chairman, or his designated alternate, and at least three SRC members, including alternates.

h. The Safety Review Committee shall review:

(1) The safety evaluations for 1) changes to procedures, equipment or systems and 2) tests or experiments completed under the provisions of the NRC order authorizing decommissioning of the LACBWR facility, to verify that such actions did not constitute an unreviewed safety question.

(2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in the NRC order authorizing decommissioning of the LACBWR facility.

(3) Proposed tests or experiments which involve an unreviewed safety question as defined in the NRC order authorizing decommissioning of the LACBWR facility.

(4) Proposed changes to Appendix "A" Technical Specifications of this license.

(5) Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.

(6) Significant deviations from normal and expected performance of facility equipment that affects nuclear safety.

(7) All REPORTABLE EVENTS.

(8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.

(9) Reports and meeting minutes of the Operations Review Committee.

(10) Changes to the Contingency Plan and Plant Security Plan.

(11) Changes to the Emergency Plan.

(12) Changes to the Decommissioning Plan.

(13) Changes to the Offsite Dose Calculation Manual.

(14) Changes to the Process Control Program.

(15) Changes to the Quality Assurance Program Description.

i. The following audits of facility activities shall be performed by the Quality Assurance Department or a qualified off-site entity under the cognizance of the SRC. These audits shall encompass:

(1) The conformance of facility operation to provisions contained within the Appendix "A" Technical Specifications and applicable license conditions at least once per 24 months.

(2) The performance, training and qualifications of the entire facility staff at least once per 24 months.

(3) The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety at least once per 12 months.

(4) The performance of activities required by the Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.

(5) The Emergency Plan and implementing procedures at least once per 12 months.

(6) The Contingency Plan, the Security Plan and implementing procedures, at least once per 12 months.

(7) The Fire Protection Program and implementing procedures at least once per 24 months.

(8) A fire protection and loss prevention program inspection and audit shall be performed at least once per 24 months.

(9) The ODCM and Radiological Environmental Monitoring Program and results at least once per 12 months.

(10) The Radiation Protection Program and the Process Control Program, and implementing procedures, at least once per 12 months.

(11) Any other area of facility operation considered appropriate by the SRC or the General Manager.

j. The SRC shall report to and advise the General Manager on those areas of responsibility listed in paragraphs 7.h and 7.i.

k. Records of SRC activities shall be prepared, approved and distributed as indicated below:

(1) Minutes of each SRC meeting shall be prepared, approved and forwarded to the General Manager within 20 days following each meeting.

(2) Audit reports encompassed by paragraph 7.i above, shall be forwarded to the General Manager and to the management positions responsible for the areas audited within 30 days after completion of the audit.

B. Facility Organization Requirements

1. The facility organization includes one or more individuals trained in the various disciplines as noted in Figure 1.

2. Job descriptions have been provided for all personnel of the LACBWR staff. The job descriptions identify the authority and responsibility that are associated with the position.

C. Dairyland Power Cooperative Organization

Figure 2 shows the organization structure for the Dairyland Power Cooperative. The LACBWR facility is a responsibility of the General Manager. The Procurement Department has responsibility for all purchases as they apply to all generating stations, including LACBWR. The Materials Handling Department has responsibility for control, identification, and issuance of all materials, parts, and components. Procurement and Materials Handling are the responsibility of the Assistant General Manager for Finance and Administration.

II. QUALITY ASSURANCE PROGRAM

A. General

The QA Program described herein sets forth the requirements for the QA organization, personnel responsibilities, controls, and measures established to achieve, maintain, and document quality. These requirements include, but are not limited to, the following:

1. Incorporation of applicable regulatory criteria, codes, standards, and design bases for structures, systems, and components into the test, operating, and maintenance procedures.

2. Performance of all installation, calibration, and testing on all necessary components in accordance with approved procedures.

3. Approved procedures being used in the operation, maintenance, testing, fuel handling, repairing, and modification of the facility in compliance with licensing regulations and consistent with quality practices established by DPC.

4. Maintenance of QA record keeping, including reports, test results, records, and logs.

5. Resolution of items of deficiency as noted by LACBWR QA personnel, Safety Review Committee, and NRC Compliance with appropriate notifications made to DPC Corporate Management.

6. Performance of audits by QA personnel to verify that administrative controls, plant procedures, and procurement documents contain the necessary QA input requirements and appropriate documentation thereof.

B. Applicability

The LACBWR QA Program is based on the requirements of 10 CFR 50, Appendix B, "Quality Assurance Requirements for Nuclear Power Plants," and Regulatory Guide 1.33 which addresses the applicable requirements of ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," as they apply to a possession-only license.

C. Implementation

Individuals assigned responsibilities, as discussed under "ORGANIZATION," shall prepare administrative and quality assurance procedures as necessary to implement the requirements of this program. Procedures shall include appropriate quantitative and qualitative acceptance criteria necessary to determine that the activity is being properly performed. Audit reports are distributed to DPC management for their review and assessment of the QA Program, as to effectiveness, scope, adequacy, and implementation. Indoctrination in the QA Program requirements shall be provided to all facility personnel performing activities which could affect the quality of components, systems, or structures.

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION III REV. NO. 11 DESIGN CONTROL AND REVIEW DATE 02/20/96 PAGE 1 OF 2
REV'D: [signature] 4-9-96 QA Director Date REV'D: Roger E Christian 4/11/96 Plant Manager Date	APPROVED: William L Berg 4/18/96 General Manager Date

III. DESIGN CONTROL AND REVIEW

A. General

This section establishes the requirements to assure that the structures, systems, and components of the LACBWR are added, deleted, changed or modified in accordance with the codes, standards, and regulations that governed the original design, except as amended and approved. Measures shall be established for the review, evaluation, and approval of all design changes governing structures, systems, or components.

Design and fabrication of shipping casks used for shipment of radioactive materials will not be conducted under this section.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing procedures to implement design control. QA shall review design drawings, specifications, calculations, and procurement documents to assure that quality standards are included or referenced.

2. The Job Coordinator assigned by the Plant Manager is responsible for completion of any facility change that becomes necessary for the LACBWR facility.

3. The Job Coordinator is responsible for the incorporation of design bases, regulatory requirements, codes and standards into drawings, specifications, procedures, and instructions.

4. The General Manager has overall responsibility for facility modifications.

5. The Operations Review Committee is responsible for reviewing all proposed facility changes and recommending approval or disapproval to the Plant Manager. The review shall determine whether the proposed modifications involve any unreviewed safety question or a possible change in the Technical Specifications.

6. The Plant Manager is responsible for reviewing the recommendations of the Operations Review Committee and taking appropriate action. He shall refer any unreviewed safety question to the Safety Review Committee.

7. The Safety Review Committee is responsible for providing an independent review of facility changes. They shall provide assurance that the facility modification meets the design bases, regulatory requirements, and applicable codes and standards.

C. Requirements

1. A Facility Change Proposal shall be initiated for all modifications. Facility Change Proposals may be initiated by any knowledgeable personnel.

2. All proposed modifications shall be reviewed to determine whether they involve an unreviewed safety question.

3. Design bases, regulatory requirements, and applicable codes and standards shall be delineated for all proposed plant modifications. These shall be incorporated into drawings, specifications, procurement documents, and procedures by the Job Coordinator. The Quality Assurance Department shall specify appropriate quality standards.

4. A Design Control Procedure shall be prepared to describe and control the design changes from inception through final approval, release, distribution, and implementation of the change. The procedure shall provide for the review of stress, hydraulic, thermal, and accident analyses, compatibility of materials, maintenance, test, and repair as appropriate. The procedures provide for a design review by an engineer or other qualified individual other than the one who performed the design.

IV. PROCUREMENT DOCUMENT CONTROL

A. General

This section establishes the measures to assure that procurement documents (purchase requisitions and orders) covering material, equipment, and services specify appropriate quality requirements. The purchase order specifies or references the applicable requirements, design bases, codes, and standards to assure quality.

B. Responsibilities

1. The Quality Assurance Department is responsible for developing procedures to control the preparation, review, and approval of purchase orders for material, equipment, and services covered by the Quality Assurance Program.

2. LACBWR Staff are responsible for initiation of material requisition worksheets for material, equipment, and services required for maintenance, repair, and minor modifications, as applicable to the needs of their departments.

3. The Engineering Staff is responsible for preparing engineering specifications which detail the technical and quality requirements for material, equipment, and services. Engineering is also responsible for preparing material requisition worksheets for material, equipment, and services required for major facility modifications.

4. Purchasing is responsible for preparing, reviewing, approving, issuing, and controlling purchase orders.

C. Requirements

1. Purchase requisitions for new material, equipment, and services and for spare or replacement parts shall be initiated by any department personnel. The purchase requisition shall contain the information such as quantity, item description, and technical and quality requirements necessary for procurement of the item.

2. Purchase orders shall include specifications which contain all the information necessary to assure that material, equipment, and services are of adequate quality. This shall include material selection, design data, equipment description, source inspection and testing requirements, cleaning, and packaging requirements, and required documentation as deemed necessary.

3. Documentation required to provide evidence that materials, equipment, and services are of adequate quality shall be clearly delineated in purchase orders. This shall include a listing of each item of documentation to be submitted, when it is to be submitted, what requires approval prior to manufacture, and to whom it shall be submitted.

4. To the extent necessary, procurement documents shall require suppliers of material, equipment, and services to have a quality assurance program complying with the pertinent provisions of 10 CFR 50, Appendix B. Suppliers shall be required to provide DPC access to their facilities and records for inspection and audit, as required, to determine compliance with provisions of the purchase order. These requirements shall extend to lower tier procurements, as determined by DPC management.

5. Purchase requisitions and engineering specifications shall be reviewed by the Quality Assurance Department to assure that all necessary technical and quality requirements are included or referenced.

6. Formal purchase orders which have been prepared from the purchase requisition shall be reviewed to assure that all required information is correctly incorporated.

7. Changes in technical content in procurement documents shall be initiated and reviewed in accordance with the same procedures utilized in preparation of the original document. The Plant Manager's approval is required prior to any changes being implemented to previously approved documents which are quality related.

V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS

A. General

This section establishes the measures to assure that activities relating to a possession-only condition are performed in accordance with approved instructions, procedures, and drawings.

B. Responsibilities

1. The Quality Assurance Department is responsible for preparing or reviewing all procedures which are required for implementation of the QAPD.

2. LACBWR Operations Department is responsible for initiating and reviewing changes in routine, abnormal, and emergency procedures.

3. Department Personnel are responsible for initiating their respective maintenance procedures.

4. The Plant Manager is responsible for approval of all new procedures or changes to existing procedures.

5. The Operations Review Committee is responsible for reviewing all initial and revised procedures that affect facility operations and shall determine whether these procedures involve an unreviewed safety question.

6. The Safety Review Committee shall review new procedures or changes to existing procedures, when determined by the Operations Review Committee that they involve an unreviewed safety question.

C. Requirements

1. Detailed instruction for possession-only operation of the plant shall be contained in procedures and checklists covering the following activities:

   a. administrative control,

   b. general system operation,

   c. startup, operation, and shutdown of systems,

   d. correction of abnormal, off-normal, or alarm conditions,

   e. control of emergencies and other significant events,

   f. radioactivity control,

   g. chemical and radiochemical control,

   h. Security Plan implementation

   i. quality assurance

   j. fuel handling,

   k. surveillance and test activities of equipment,

   l. Emergency Plan implementation,

   m. Fire Protection Program implementation,

   n. Process Control Program implementation,

   o. Offsite Dose Calculation Manual implementation, or

   p. any other procedures required by Regulatory Guide 1.33, Revision 2, for a possession-only condition.

2. For activities other than those within normal craft expertise, instructions for maintenance and repair shall be contained in procedures. These procedures shall contain instructions for preparation, performance, checkout and return to service. The procedures may reference manufacturer's instruction manuals, drawings, and other sources, as applicable.

3. Instructions, procedures, or drawings shall delineate the method and sequence by which an activity is to be performed. These documents shall include appropriate quantitative or qualitative acceptance criteria for determining that the activity has been satisfactorily performed.

4. The department responsible for an activity shall be required to provide the necessary internal review and approval of instructions, procedures, or drawings prior to performing the activity.

5. Changes to or deviations from established instructions, procedures, or drawings will require the same review and approval as the original document. However, temporary changes to procedures which do not change the intent of the original procedure may be made in ink, dated, and approved by two people on the facility management staff. Such changes shall be documented and reviewed by the ORC and approved by the Plant Manager within 30 days of implementation.

6. Applicable sections of the appropriate procedures shall be followed in the review, processing of changes or deviations, filing, and distribution of procedures, drawings, and specifications.

7. Procedures will be reviewed periodically as set forth in administrative procedures.

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION VI REV. NO. 11 DOCUMENT CONTROL DATE 02/20/96 PAGE 1 OF 2
REV'D: [signature] 4-9-96 QA Director Date REV'D: [signature] 4/11/96 Plant Manager Date	APPROVED: William L Berg 4/18/96 General Manager Date

VI. DOCUMENT CONTROL

A. GENERAL

This section establishes the requirements for document control as it applies to the LACBWR facility.

B. RESPONSIBILITIES

1. The Quality Assurance Department is responsible for preparing a standard procedure for controlling the issuance of procedures and is also responsible for preparing procedures for controlling the distribution of operating, maintenance, repair, and modification procedures.

2. One Shift Supervisor has been assigned the responsibility of maintaining the LACBWR Operating Manual and any approved changes to the manual. He is further responsible for the assurance that approved drawings, procedures, and other pertinent documents are incorporated in the LACBWR Operating Manual.

3. The DPC Drawing Control Specialist is responsible for preparing a standard procedure for controlling the issuance of drawings and specifications.

C. REQUIREMENTS

1. Procedures shall be established for the issuance of procedures, drawings, and specifications. A document control procedure shall be prepared to provide a uniform system of document identification.

2. All documents shall have an identification number, title, date, and revision number. Documents shall be filed and controlled by use of this identification. Each type of document shall be filed in a central location identified in a document control procedure.

3. Drawings, specifications, and procedures, including revisions, shall be reviewed for adequacy and approved for release by authorized personnel. The required reviews and approvals shall be specified in a document control procedure.

4. The Administrative Supervisor shall assure that current documents are distributed to and used at the location where the prescribed activity is performed. Documents and revisions shall be distributed as specified in a document control procedure. Preliminary and superseded documents shall be clearly identified and closely controlled to preclude their misuse.

5. An index of each type of document shall be established and maintained to provide the current status of documents.

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION VII REV. NO. 9 CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES DATE 04/12/94 PAGE 1 OF 2
REV'D: _____ 4-9-96 QA Director Date REV'D: _____ 4/11/96 Plant Manager Date	APPROVED: _____ 4/18/96 General Manager Date

VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

A. General

This section establishes the requirements to assure that purchased material, equipment, and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents.

B. Responsibilities

1. The Quality Assurance Department is responsible for developing procedures for supplier evaluation and selection. QA shall be responsible for coordinating supplier evaluation, selection, and evaluating supplier Quality Programs.

2. The Engineering Staff shall be responsible for evaluating supplier manufacturing and technical capabilities.

3. The Operations Department shall be responsible for evaluating the performance of material and equipment in service.

4. The Quality Assurance Department is responsible for developing procedures for receiving inspection of material and equipment.

C. Supplier Qualification

1. Qualification of suppliers shall consist of DPC's experience with the supplier, supplier's reputation and experience in the field, and in the nuclear industry, and his Quality Assurance Program and other factors, as appropriate.

D. Source Inspection

1. When appropriate, suppliers shall be requested to furnish DPC with sufficient information concerning their manufacturing and inspection plan to permit DPC or their designated agent to plan and implement a source inspection plan.

2. When appropriate, inspection plans shall include witness and hold points for inspection of items, witnessing of processes or tests, audit of required quality documentation, and verification that vendors have complied with the specification requirements and have documented any deviation from the specifications.

E. Receiving Inspection

1. Items shall be examined by the Storekeeper upon receipt for shipping damage, correctness of identification, and specified quality documentation, in accordance with approved instructions.

2. Documentary evidence that items conform to purchase order requirements shall be available at the plant prior to installation or use of the item.

3. Documentary evidence shall be sufficient to identify the specific requirements such as codes, standards, and specifications met by the purchased item. This requirement shall be satisfied by having available at the plant, copies of the purchase order and appropriate documents referenced therein.

4. All QC ordered materials, parts, and components will be segregated upon receipt and will be placed in a receiving inspection hold area separate from storage facilities. After acceptance, the material will be stamped as acceptable and placed in specified spare parts storage.

5. During receiving inspection, if a nonconformance or discrepancy exists, the material shall be placed on hold and will remain in a hold status until final disposition is determined. A Discrepancy Report shall be initiated.

6. Items dispositioned as unacceptable for use shall be rejected and removed from the controlled receiving inspection area.

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION VIII REV. NO. 11 IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS DATE 02/20/96 PAGE 1 OF 2
REV'D: [signature] 4-9-96 QA Director Date REV'D: [signature] 4/11/96 Plant Manager Date	APPROVED: [signature] 4/18/96 General Manager Date

VIII. IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, AND COMPONENTS

A. General

This section establishes the requirements for identification and control of material, parts, and components from receipt at the plant through installation or use.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing the overall requirements for the identification and control of materials, parts, and components from receipt through installation or use, and/or developing procedures and instructions for the control and issuance of quality related materials, parts, and components.

2. The Plant Manager shall approve and implement procedures for the identification and control of materials, parts, and components.

3. The Materials Handling Department of DPC is responsible for control of, identification, and issuance of all material, parts, and components.

C. Requirements

1. Approved instructions and procedures shall be implemented for the identification and control of materials, parts, and components from receipt through installation or use. An identification system utilizing purchase order numbers shall be implemented for identification of material, parts, and components.

2. Specifications shall require that materials, parts, and components are identified in accordance with purchase order numbers and shall require that documentation have identification providing traceability to the item.

3. Physical identification by purchase order number shall be used to the maximum extent possible for relating an item at any time to applicable documentation. Identification shall be either on the item or records traceable to the item. Where physical identification is impractical, physical separation, procedural control, or other appropriate means shall be employed.

IX. CONTROL OF SPECIAL PROCESSES

A. General

This section establishes the measures to assure that special processes, including welding, heat treating, and non-destructive testing, are controlled and accomplished by qualified personnel using qualified procedures in accordance with applicable codes, standards, specifications, criteria, and other special requirements.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing procedures which describe how personnel and procedures are qualified for special processes.

2. Members of the facility staff are responsible for preparing procedures for welding, heat treating, cleaning, non-destructive examination, and filler metal control. The Plant Manager is responsible for assuring the qualification of personnel in special processes and maintaining records of qualified personnel and procedures.

3. The Quality Assurance Department is responsible for assuring that maintenance, repair, and modification work involving special processes are performed by qualified personnel in accordance with qualified procedures.

C. Requirements

1. Welding, heat treating, cleaning or decontamination of parts, and non-destructive examination shall be accomplished under controlled conditions in accordance with applicable codes, standards, criteria, and other special requirements, using qualified personnel and procedures. Qualification of personnel and procedures shall comply with the requirements of applicable codes and standards.

2. Welders and welding procedures shall be qualified in accordance with Section IX of the ASME Boiler and Pressure Vessel Code. Records of the test results obtained in welding procedures and welder performance qualifications and a listing of qualified personnel and procedures shall be maintained.

3. Non-destructive examination personnel shall be qualified in accordance with the American Society for Non-destructive Testing Standard SNT-TC-1A. Records of training, test results, and a listing of qualified personnel shall be maintained.

4. Plant procedures shall be established to describe the requirements for qualification of personnel and procedures.

5. Procedures shall be established to describe the method used to control the receipt, storage, baking, drying, and disbursal of welding filler metals.

6. Equipment used for accomplishing special processes shall be calibrated, maintained, stored, handled, and issued in accordance with applicable procedures.

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION X REV. NO. 11 INSPECTION DATE 02/20/96 PAGE 1 OF 2
REV'D: [signature] 4-9-96 QA Director Date REV'D: [signature] 4/4/96 Plant Manager Date	APPROVED: William L Berg 4/18/96 General Manager Date

X. INSPECTION

A. General

This section establishes a program for inspection of possession-only activities to verify conformance with approved procedures, drawings, and specifications.

B. Responsibilities

1. The Quality Assurance Department is responsible for assuring that adequate inspection requirements are included in engineering specifications and for reviewing any inspection procedures that implement this section of the manual.

2. The QA Department is responsible for establishing inspection procedures and assuring that adequate inspection requirements are included in procedures. It is also responsible for coordinating the assignments of qualified inspection personnel.

3. The Plant Manager shall be responsible for approving inspection procedures. The Plant Manager shall also assure that sufficient inspections are performed to provide adequate confidence that activities meet predetermined requirements.

C. Requirements

1. Inspections shall only be performed by qualified personnel. In no case shall the acceptance inspection be performed by the individual who performed the activity.

2. Mandatory inspection hold points, which require witnessing or inspecting of an activity before proceeding, shall be indicated in the appropriate procedures or specifications. The inspection shall be documented to indicate approval and release prior to continuation of the activity.

3. Inspection requirements shall apply to all activities whether performed by company personnel or contractor personnel, and shall require that inspection procedures and instructions along with necessary drawings are provided prior to commencing inspection activities.

4. Inspection requirements governing modifications, repairs, and replacement shall be in accordance with the original design and inspection requirements or as amended by approved changes to the original design.

XI. TEST CONTROL

A. General

This section establishes the requirements for a test program to demonstrate that structures, systems, and components will perform satisfactorily in service. The test program shall include, but not be limited to, surveillance testing, special tests, post maintenance testing, and testing following facility modification or significant changes in procedures.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing the requirements to control the test program. The test program shall include, but not be limited to, surveillance testing, special tests, post maintenance testing, and testing following facility modification or significant changes in procedures.

2. Engineers and/or designated Management Staff shall be responsible for preparation and review of test procedures, surveillance during testing, and review and documentation of test results.

3. The Plant Manager is responsible for the approval of test procedures. He is also responsible for the conduct of all testing associated with LACBWR.

4. The Engineering or Management Staff is responsible for establishing specifications, requirements and acceptance criteria for testing following plant modifications. They also shall review and approve test results for testing following plant modifications.

5. The Operations Review Committee is responsible for the review of all proposed test procedures and for review of procedures for special testing and performance testing following facility modification.

6. The Safety Review Committee is responsible for reviewing proposed tests which involve an unreviewed safety question and is responsible for reviewing the safety evaluation for tests completed under the provisions of a safety analysis, to verify that such tests did not constitute an unreviewed safety question.

C. Requirements

1. A program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and documented.

2. Testing shall be performed in accordance with approved test procedures which incorporate or reference the requirements and acceptance criteria contained in applicable design documents and Technical Specifications.

3. Test procedures shall incorporate, but not be limited to, requirements for such items as: hold points, witness points, caution notes, emergency requirements and test jumper logs.

4. Test procedures shall include, as a minimum, provisions for assuring that:

   a. Prerequisites have been completed that include, as a minimum:

      1) Control of systems status as necessary.
      2) Availability of calibrated instrumentation and special equipment.

   b. Test objectives and applicable acceptance limits are stated.

   c. Test results are documented.

   d. Detailed instructions for performing the test are included.

   e. Test results are reviewed and approved.

5. Test reports shall include identification of the inspector, individual conducting the test, the data recorder, the type of observation made, the equipment used, the test results, the acceptability of the test results, and approved disposition for any deviations.

   Test results which fail to meet the requirements and acceptance criteria shall be properly noted and appropriate corrective action taken.

XII. CONTROL OF MEASURING AND TEST EQUIPMENT

A. General

This section establishes the requirements for written procedures for the control, calibration, and periodic adjustment of tools, gauges, instruments, and other measuring and test equipment used to verify conformance to established requirements.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing requirements for a program for the control, calibration, and periodic adjustment of tools, gauges, instruments, and other measuring and test equipment used by facility personnel.

2. Crafts Personnel are responsible for periodic calibration and adjustment of tools, gauges, instruments, and other measuring and test equipment to assure compliance with the implementing procedures.

3. The Plant Manager is responsible for implementing the requirements of this section of the manual. He is also responsible for approving procedures.

C. Requirements

1. Inspection, test, and work procedures shall include provisions to assure that tools, gauges, instruments, and other inspection, measuring, and test equipment and devices used in activities affecting quality are of the proper range, type, and accuracy to verify conformance to established requirements and test parameters.

2. To assure equipment accuracy, inspection, measuring, and test equipment shall be controlled, calibrated, adjusted, and maintained periodically, or prior to use. Calibrations are performed against certified measurement standards that are traceable to nationally recognized standards. Where national standards do not exist, provisions will be established to document the basis for calibration. Control measures and procedures shall prevent the use of calibrated tools, gauges, instruments, and other measuring and test equipment by unauthorized personnel. Special calibration and control measures are not required for devices when normal commercial practices provide adequate accuracy.

3. When an item of measuring and test equipment is found to be out of calibration, an investigation will be conducted and documented to determine the validity of previous inspections, tests, or calibrations which were performed with the use of that item.

4. Records or logs of the calibration history of measuring and test equipment shall be maintained.

5. Measuring and test equipment shall be controlled by a permanently affixed serial number. Calibration decals, tags or stickers shall be displayed prominently on each device and shall reflect the date of calibration, due date of the next calibration (for recurring calibration) and identity of person performing the calibration.

XIII. HANDLING, STORAGE, AND SHIPPING

A. General

This section establishes the requirements for procedures to control the handling, storage, shipping, cleaning, packaging, and preservation of material and equipment to prevent damage, deterioration, or loss through shipment, installation or use.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing requirements for the handling, storage, and shipping of materials, parts, and components covered by the Quality Assurance Program.

2. The Plant Manager is responsible for implementing the requirements of this section of the Quality Assurance Program Description and shall approve all implementing procedures.

C. Requirements

1. The requirements for handling, storage, shipping, cleaning, and preservation of materials, and equipment shall be documented in approved procedures.

2. Procurement documents shall include instructions for the handling, storage, shipping, cleaning, and preservation of the item being supplied as applicable.

3. Procurement documents specify marking requirements, special covering, and protective environments, such as inert gas atmosphere, moisture content levels, and temperature levels, as applicable.

4. Specifications and procedures establish the requirements for special handling tools and equipment to ensure safe and adequate handling of critical, sensitive, or radioactive items.

5. Special handling tools and equipment will be inspected and tested in accordance with approved procedures, at specified intervals, to verify that tools and equipment are adequately maintained.

6. Materials and equipment will normally be handled by stockroom personnel. Fuel and other special shipments which require special equipment and handling will be handled by others knowledgeable and/or specially trained personnel. The proper use of fuel handling equipment will be described in fuel handling procedures.

7. Storage of material and equipment will be in areas free from fumes, vapors, and dust. Storage will be in areas protected from the weather, as appropriate, and in which chemical storage is excluded, except as may be specifically authorized in writing. Storage will be in areas which satisfy the handling and storage requirements specified for the item.

XIV. INSPECTION, TEST, AND OPERATING STATUS

A. General

This section of the manual describes the system for indicating the inspection, test, and operating status of components and systems.

B. Responsibilities

1. The Plant Manager is responsible for ensuring that the status of operating equipment or systems to be removed from service for maintenance, test, inspection, repair, or modification is in accordance with the approved LACBWR procedures. The Plant Manager is also responsible for the control of facility status during equipment or system modifications.

2. The QA Department shall monitor the status of activities for their compliance to approved procedures and shall ensure that inspection results are properly logged. They shall establish the procedures for implementing the work inspection or status sheets during maintenance, repair, and modifications and shall ensure that inspection results are properly logged.

C. Requirements

1. Equipment or systems not ready for normal service shall be clearly identified by the use of tags, an equipment status board and the Control Room Log Book to indicate their status.

2. Equipment or system inspection and test status shall be indicated by use of a yellow "Special Information" Tag or Control Room Log Book.

3. Systems, components, and equipment which are found to be unacceptable during or after testing shall be clearly identified in the Shift Supervisor's Log Book or on the Test Data Sheets.

4. Operations involving handling of fuel assemblies or other radioactive sources shall be identified and controlled by the use of tags, control log sheets, or other suitable means.

5. Facility maintenance, repair, or modification of components, systems, or structures will utilize a test sheet or Shift Supervisor log entry to indicate its acceptance or rejection for a particular component, system, or structure.

6. Maintenance Requests shall be used to originate, approve, authorize, and document all non-routine maintenance or repair work performed at LACBWR.

XV. NONCONFORMING MATERIALS, PARTS, OR COMPONENTS

A. General

This section establishes the measures to control materials, parts, or components which do not conform to requirements in order to prevent their inadvertent use or installation.

B. Responsibilities

1. The Quality Assurance Department shall be responsible for establishing a procedure for the control, evaluation, and disposition of deficient materials, parts, and components.

2. The Engineering Staff is responsible for reviewing nonconforming items which cannot be corrected by vendor action and recommending disposition. The Engineering Staff is also responsible for preparing procedures for repair and rework of nonconforming items.

C. Requirements

1. Materials, parts, or components which do not conform to requirements shall be identified and placed in a hold status. Nonconforming items shall remain in a segregated area until approved disposition has been determined.

2. The vendor shall be notified of all nonconforming items and requested to correct the deficiency. Purchasing is responsible for coordinating the disposition of deficient items with vendors. The Engineering Staff is responsible for inspecting and accepting or rejecting items which have been corrected by vendors.

3. Deficiencies which cannot be corrected by the vendor shall be reviewed by the Engineering Staff. The Engineering Staff will recommend repair, rework, accept, or reject. Items shall be repaired or reworked only in accordance with approved procedures and shall be reinspected after repair by the QA Department. QA shall ensure that documented and approved procedures are available prior to repair or rework and shall reinspect all repaired or reworked items.

   Items which are accepted for use with a known deficiency shall be fully documented with the specification requirement, justification for acceptance, and effect of such use. All such items shall be approved by the Plant Manager prior to use.

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION XVI REV. NO. 11 CORRECTIVE ACTION DATE 02/20/96 PAGE 1 OF 2
REV'D: [signature] 4-10-96 QA Director Date REV'D: [signature] 4/11/96 Plant Manager Date	APPROVED: [signature] 4/18/96 General Manager Date

XVI. CORRECTIVE ACTION

A. General

This section establishes measures to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

B. Responsibilities

1. The Quality Assurance Department is responsible for establishing procedures for the identification, review, and correction of conditions adverse to quality.

2. The Operations Review Committee is responsible for reviewing significant conditions adverse to quality and recommending corrective action.

3. The Engineering Staff is responsible for reviewing conditions adverse to quality which involve design deficiencies to determine the cause of the condition and for recommending corrective action to preclude repetition.

C. Requirements

1. Conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, as specified in ACP-17.1, shall be reported on an Incident Report or Licensee Event Report (LER). The Incident Report shall identify the condition, the cause of the condition, and the corrective action taken.

2. Conditions adverse to quality which involve design deficiencies or recommended corrective actions which involve a design change shall be reviewed by the Engineering Staff.

3. Nonconforming materials, parts, or components shall be identified by a Deficiency Report. A Deficiency Report shall be initiated and processed whenever the actual condition is not in accordance with drawings or specifications. Corrective action is an integral part of the nonconforming control system.

4. Maintenance Requests can be a part of the documented corrective action program.

5. Quality Assurance Department shall audit corrective actions to assure that the cause of the condition has been determined and that corrective action has been taken in accordance with recommendations.

XVII. QUALITY ASSURANCE RECORDS

A. General

This section establishes measures for maintaining records which cover all documents and records associated with the decommissioning, operation, maintenance, repair, and modification of structures, systems, and components covered by the Quality Assurance Program Description.

B. Responsibilities

1. The Quality Assurance Director is responsible for the QA Department establishing the requirements of this section.

2. The Plant Manager is responsible for approving and implementing procedures for this section.

C. Storage Requirements

1. Originals of special process records are stored in a fire-retardant area designed to accommodate such records.

2. On-site storage facility is constructed in such a manner as to safeguard the contents from fire, extreme temperature, and moisture variations.

3. Entry to the record storage areas is controlled and only authorized personnel are permitted access.

4. Storage requirements shall meet ANSI N45.2.9, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records."

D. System Requirements

1. A system shall be established to identify all documents that must be kept permanently (lifetime records). An index of non-permanent records shall be established.

2. An approved document listing will be reviewed on a regular basis to verify that the record file contains the latest revisions of all required documents.

3. A system will be established to control the issuance and return of all records.

4. The Operations Review Committee shall maintain written minutes of each ORC meeting that, at a minimum document the results of all ORC activities. Copies shall be provided to the General Manager and the SRC.

5. Records of SRC activities shall be prepared, approved and distributed as indicated below:

   a. Minutes of each SRC meeting shall be prepared, approved and forwarded to the General Manager within 20 days following each meeting.

   b. Audit reports shall be forwarded to the General Manager and to the management positions responsible for the areas audited within 30 days after completion of the audit.

E. Record Retention

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.

1. The following records shall be retained for at least five years:

   a. Records and logs of facility operation.

   b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

   c. All REPORTABLE EVENTS submitted to the Commission.

   d. Records of surveillance activities, inspections and calibrations required by the QAPD.

   e. Records of changes made to the procedures required by Section V of the QAPD.

   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.

2. The following records shall be retained for the duration of the LACBWR License:

   a. Facility design modification packages.

   b. Records of new and irradiated fuel inventory, fuel transfers and assembly burn-up 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, and records of analyses required by the Radiological Environmental Monitoring Program.

e. Records of reactor tests and experiments.

f. Records of training and qualification for current members of the facility staff.

g. Records of in-service inspections performed pursuant to Technical Specifications.

h. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to the LACBWR Decommissioning Order dated Aug. 7, 1991, as modified Sept. 15, 1994, and 10 CFR 50.59.

i. Records of meetings of the ORC and the SRC.

DAIRYLAND POWER COOPERATIVE LACBWR **QUALITY ASSURANCE PROGRAM DESCRIPTION**	SECTION XVIII REV. NO. 11 AUDITS DATE 02/20/96 PAGE 1 OF 2
REV'D: _____ 4-18-96 QA Director Date REV'D: _____ 4/11/96 Plant Manager Date	APPROVED: _____ 4/18/96 General Manager Date

XVIII. AUDITS

A. General

This section establishes the requirements for a system of planned and documented audits to verify compliance with all aspects of the Quality Assurance Program Description contained in the Quality Assurance Program and to assess the effectiveness of the program. The system provides for the reporting and review of audit results by appropriate levels of supervision and management.

B. Responsibilities

1. The Quality Assurance Department is responsible for implementing this section. They are responsible for developing audit checklists, designating and training audit personnel, and conducting audits.

C. Requirements

1. Audits shall be performed in accordance with written procedures or checklists by appropriately trained personnel having no direct responsibilities in the area audited.

2. Audits may be conducted by Quality Assurance personnel or other qualified personnel, such as technical specialists from other company departments and outside consultants.

3. Audit and surveillance results shall be documented and reviewed with supervision responsible for the area audited who shall take necessary action to correct reported deficiencies.

4. Audit results shall be documented and reported to the supervision having responsibility in the area audited.

5. Quality Assurance Auditors shall assess the following:

   a. evaluation of quality assurance practices, procedures, and instructions;

   b. effectiveness of implementation; and

   c. conformance with approved procedures.

6. A system of planned and scheduled audits shall be generated. In addition, audits shall be conducted on an unscheduled basis, when one or more of the following conditions exist:

   a. When significant changes are made in functional areas of the Quality Assurance Program, including significant reorganizations and procedural revisions.

   b. When it is suspected that safety, performance, or reliability of an item is questionable due to deficiencies or nonconformances in the Quality Assurance Program.

   c. When a systematic, independent assessment of program effectiveness or item quality, or both, is considered necessary.

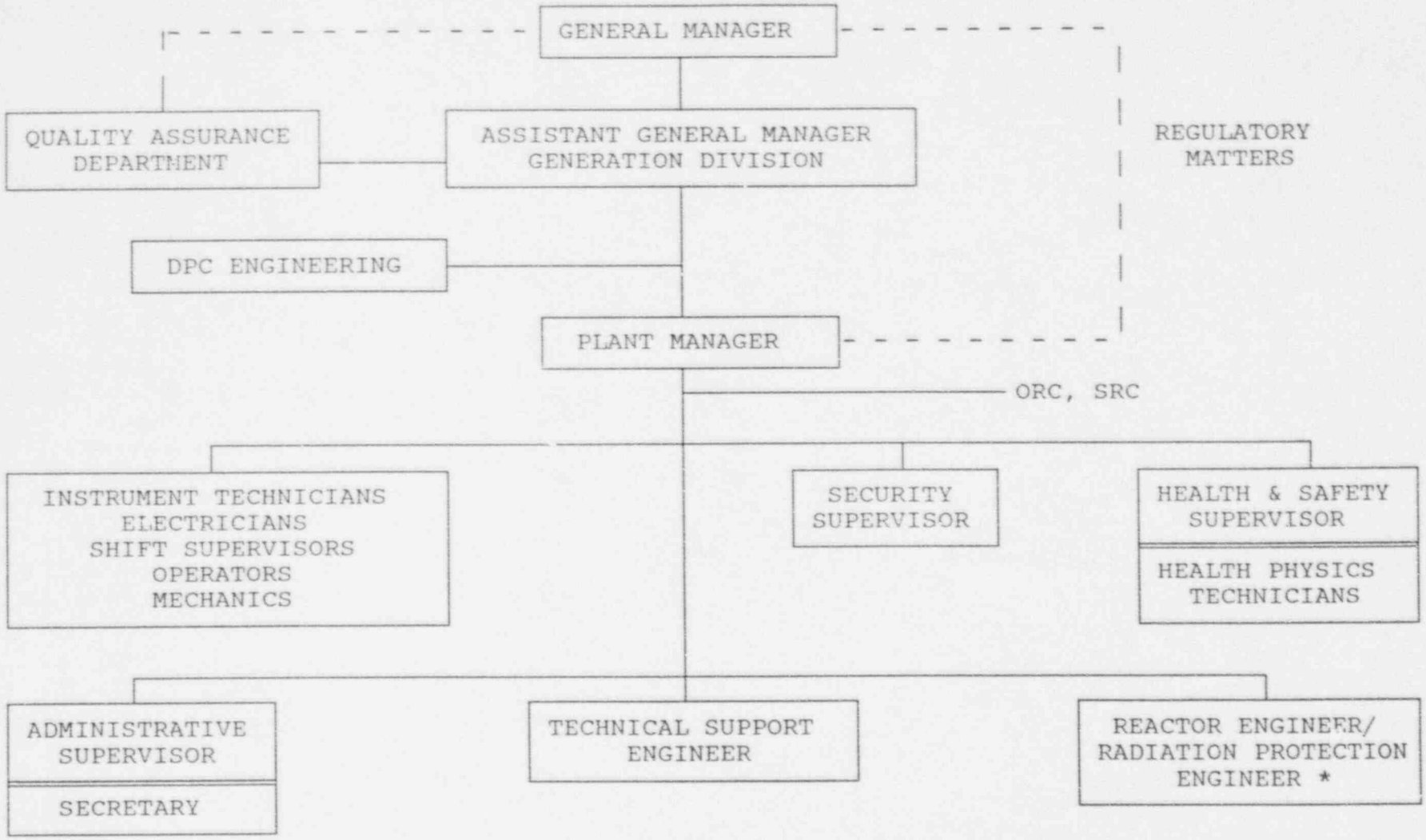
   d. When it is considered necessary to verify the implementation of required corrective actions.

7. Deficiencies or nonconformances identified during an audit shall be documented and brought to the attention of the Plant Manager. Follow-up shall be performed to verify that corrective actions have been taken to correct the deficiencies or non-conformances.

8. Audit reports are sent to DPC management for their review and assessment of the QA Program.

LACBWR QUALITY ASSURANCE PROGRAM (SECTION)		REGULATORY GUIDE 1.33		
		IMPLEMENTING PROCEDURES	ANSI 18.7 (SECTION)	10 CFR 50 APPENDIX B (SECTION)
0.0	INTRODUCTION			
I.	ORGANIZATION	ACP-02.1, ACP-03.1	1, 3.1, 3.2, 3.4.2	I
II.	QUALITY ASSURANCE PROGRAM	ACP-03.1, QAI-1	3.1, 3.2, 3.3, 3.4.2, 5.1, 5.2	II
III.	DESIGN CONTROL AND REVIEW	ACP-04.1, ACP-03.3, ACP-04.3	5.2.7.2	III
IV.	PROCUREMENT DOCUMENT CONTROL	ACP-05.1	5.2.13.1	IV, V, VI
V.	INSTRUCTIONS, PROCEDURES, AND DRAWINGS	LACBWR OPERATING MANUAL ACP-06.1, ACP-06.2	5.2.7, 5.3	V
VI.	DOCUMENT CONTROL	ACP-06.1, 06.3, 07.1, 07.3, ECP-2, QAI-2, QAI-3	5.2.15	VI
VII.	CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES	ACP-08.2, ACP-08.4 QUA-006, 007	5.2.13.2	VII, VIII
VIII.	IDENTIFICATION AND CONTROL OF MATERIALS, PARTS, & COMPONENTS	ACP-09.1, ACP-30.1	5.2.13.3	VIII
IX.	CONTROL OF SPECIAL PROCESSES	ACP-10.1, ACP-10.3	5.2.12, 5.2.18	IX
X.	INSPECTION	ACP-11.1, QUA-002, 003, 004, 005, 006, 008, 009, 010, 011	5.2.17	X
XI.	TEST CONTROL	ACP-12.1	5.2.19	XI
XII.	CONTROL OF MEASURING AND TEST EQUIPMENT	ACP-13.1	5.2.16	XII
XIII.	HANDING, STORAGE, & SHIPPING	ACP-14.0, ACP-30.1, IQI-2	5.2.13.4	XIII
XIV.	INSPECTION, TEST AND OPERATING STATUS	ACP-2.3, ACP-11.1, ACP-12.1, ACP-15.1, ACP-15.2	5.2.6, 5.2.14	XIV
XV.	NONCONFORMING MATERIALS, PARTS, OR COMPONENTS	ACP-16.0, QAI-7	5.2.14	XV
XVI.	CORRECTIVE ACTION	ACP-17.1, 17.2, 17.3, 17.4	5.2.11	XVI
XVII.	QUALITY ASSURANCE RECORDS	ACP-18.1	5.2.12	XVII
XVIII.	AUDITS	QAI-5, QAI-6, ACP-19.0	4.5	XVIII

FIGURE 1



* Duties to be performed with assistance of qualified consultants when necessary.

DAIRYLAND Power COOPERATIVE – LA CROSSE, WISCONSIN

MANAGEMENT ORGANIZATION

JANUARY 1996

BOARD OF DIRECTORS

GENERAL MANAGER
William L. Berg

LEGAL COUNSEL
Wheeler, Van Sickle & Anderson

EXTERNAL RELATIONS
Thomas A. Steele, Director

ADMINISTRATION
Mary Sexton
Executive Secretary & Administrative Assistant to the General Manager

INFORMATION TECHNOLOGY
Richard J. Boettcher, Director

- Cooperative Systems
- Customer & Technical Services
- Dairyland Systems
- Information Center

HUMAN RESOURCES
Mary L. Lund, Director

- Benefits & HRIS
- Compensation
- Employment & Labor Relations
- Safety & Security
- Training

GENERATION
Assistant General Manager
John P. Leifer

* Environmental Affairs
  - Air Quality
  - Analytical Laboratory
  - Environmental Impact
  - Solid Waste
  - Water Quality
* Generation Support Services
  - Flambeau Hydroelectric Station
  - Generation Engineering
  - Generation Maintenance
  - Nuclear & Special Projects
  - Performance Administration
* LACBWR
* System Operations
  - Operations Computers
  - Operations Planning
  - System Operations Center
* Plant Operations
  - Alma Site
  - Genoa Site
* Quality Assurance

TRANSMISSION
Assistant General Manager
Charles V. Sans Crainte

* Transmission Construction & Maintenance
  - Electrical Maintenance
  - Field Operations
  - Substation Construction
  - Transmission Construction
  - Transmission Maintenance
  - Vehicle Maintenance
* Transmission Engineering
  - Real Estate/Right-of-Way/Related Services
  - Siting Regulation
  - Staff Attorney
  - Survey
  - Transmission Design
  - Vegetation Management
* Electrical Engineering
  - Electrical Design
  - Facility Planning
  - Substation Design
  - Telecommunications Engineering
  - Telecommunications Maintenance

CUSTOMER SERVICES & PLANNING
Assistant General Manager
Alison J. Thimis

* Planning Services
  - Corporate Planning
  - Energy Services
  - Forecasting
  - Load Management Support
* Strategic Planning
* Customer Relations and Sales
* Printing Services
* Graphic Services
* Marketing & Development Services
  - Area Development
  - Audio/Visual Services
  - Communications
  - Market Assessment
  - System Marketing & Advertising

FINANCE & ADMINISTRATION
Assistant General Manager
Robert C. Mueller

* Internal Auditor
* Accounting
  - Accounts Payable
  - General Accounting & Financial Systems
  - Payroll
  - Project & Fixed Asset Management
* Office Services
  - Cafeteria
  - Mail Services
  - Records Management
* Procurement
  - Aviation
  - Building Services
  - Fuels
  - Materials Handling
  - Purchasing
* Financial Management
  - Budget
  - Cash Management
  - Financial Analysis
  - Risk Management/REA Liaison