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Item	Facility	Type	Sub	Document Number / Title	Sheet	Revision	Doc Date	Copy #	Media	Copies
* 0001	MP	PROC	OST	MP-02-OST-BAP01 QUALITY ASSURANCE PROGRAM TOPIC REPORT		021 13			P	01
* 0002	MP	PROC	OST	MP-02-OST-BAP01 QUALITY ASSURANCE PROGRAM TOPIC REPORT		021 14			P	01

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Northeast
Utilities System

Memo

NO-00-0164

May 15, 2000

TO: Northeast Utilities Quality Assurance Program Topical Report Controlled
Copyholders

FROM: 
D. S. Bruce

SUBJECT: NUQAP Topical Report Revision 21, Change 13
(Document No. MP-02-OST-BAP01)

Enclosed is NUQAP Revision 21, Change 13, which modifies NUQAP, Appendix E, to include an exception to ANSI N18.7-1976, Paragraph 5.2.5, "Review, Approval and Control of Procedures." The NUQAP change will allow Station Procedures group more flexibility in the implementation of administrative and programmatic controls that ensure procedures are maintained current in accordance with 10CFR50, Appendix B.

Please replace the entire contents of the existing Quality Assurance Program, Appendix F, with the enclosed section.

Change 13 changes are in ***bold and italics*** with a revision bar in the right margin. The footer of the affected section includes a reference to Change 13.

Please insert the summary of changes document in the front of your manual. Please note the effective date of the change is **May 15, 2000**.

If you have any questions, contact D. Bruce at X3185.

Attachments:

1. Summary of changes incorporated as part of Revision 21, Change 13.

Enclosure:

Change 13 to the Northeast Utilities Quality Assurance Program Topical Report Revision 21.

2004

Summary of Changes to NUQAP Rev. 21 Incorporated as Change 13

<u>Section</u>	<u>Summary Description of Changes</u>	<u>Reference</u>
Appendix E	<p>Added exception #14 regarding ANSI N18.7-1976, Paragraph 5.2.15, "Review, Approval, and Control of Procedures," which states in part: "Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable." (Note: This change was a reduction in commitment submitted to the NRC for approval in B17940.)</p>	Request 99-024

APPENDIX E

NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP) TOPICAL REPORT - MILLSTONE POWER STATION

PROGRAM EXCEPTIONS

1. ANSI N45.2.9, states in part, "structure, doors, frames, and hardware should be Class A fire-related with a recommended four-hour minimum rating." The three record storage vaults at NNECO have a two-hour rating.

NNECO's vaults are used for storage of documentation that is unsuitable for filming or awaiting filming.

A records organization exists along with written procedures addressing the control of quality assurance records.

2. ANSI N18.7-1976, paragraph 4.3.2.3 "Quorum" states in part: "A quorum for formal meetings of the (Independent Review) Committee held under the provisions of 4.3.2.2 shall consist of not less than a majority of the principals, or duly appointed alternates..."

A quorum of the Nuclear Safety Assessment Board shall consist of the Chairman or Vice Chairman and at least enough members to constitute a majority of the assigned members. No more than a minority of the quorum shall have line responsibility for operation of one of Northeast Utilities' nuclear units. No more than two alternates shall be appointed voting status at any meeting in fulfillment of the quorum requirements.

3. ANSI N45.2.9-1974, paragraph 1.4, definition of "Quality Assurance Records" states in part: "For the purposes of this standard, a document is considered a quality assurance record when the document has been completed."

Northeast Utilities has developed the following alternative definition to provide guidance during the interim period from the time a document is completed until it is transmitted to the Nuclear Document Services Facility:

"A record is considered a working document until it is transmitted to the Nuclear Document Services Facility (NDSF) at which time it is designated as a Quality Assurance Record. The following maximum time limits are established for the transmittal of working documents to the NDSF:

Operations Documents - Documentation generated during plant operations may be maintained, as needed, by operating plant departments, for up to one year.

New Construction or Betterment Documents - Documents which evolve during new construction or betterment projects shall be transmitted to NDSF within 90 days of completion of a new construction project or turnover of a betterment project or plant operations.

Procurement Documents - Inspection/Surveillance/Audit Reports generated during vendor oversight activities which are used to maintain vendor status for current and future procurements may be maintained, as needed, by Nuclear Materials and Document Management for up to three years.

All Other Working Documents - All other working documents shall be transmitted to NDSF within 6 months of their receipt or completion."

The requirements of ANSI N45.2.9-1974 do not apply to these "working documents" based on paragraph 1.1 of the ANSI standard which states:

"It (ANSI N45.2.9) is not intended to cover the preparation of the records nor to include working documents not yet designated as Quality Assurance Records."

4. Regulatory Guide 1.64 - 6/76, the Regulatory position states, in part, "It should not be construed that such verification constitutes the required independent design verification." Northeast Utilities has developed the following alternative to allow for adequate independent design verification:

This review may be performed by the originator's Supervisor, only if the Supervisor:

Did not specify a singular design approach;

Did not establish the design inputs or did not rule out certain Design considerations;

Is the only individual in the organization competent to perform the review.

Where the Supervisor performs the design review, the next level of management shall fulfill the Supervisor's responsibilities.

5. ANSI N45.2.13 - 1976, paragraph 10.3.4, states in part, "Post-Installation Test requirements and acceptance documentation (should) shall be mutually established by the purchaser and supplier." Involvement by the supplier in establishing Post-Installation Test requirements and acceptance documentation is requested only when it is deemed necessary and proper by the responsible engineering organization.

Northeast Utilities no longer has any nuclear plants under construction. As a result, most procurements are made for spare parts from suppliers who are not the original equipment manufacturer. In these cases, the supplier may have little or no understanding or knowledge of either the operation of the system the component is to be installed in, or applicable Post-Installation Test requirements and acceptance documentation. As such, Northeast Utilities assumes responsibility for establishing Post Installation Test requirements and acceptance documentation.

6. ANSI N45.2.2-1972, paragraph 1.2, states in part that, "The requirements of this standard apply to the work of any individual or organization that participates in the packaging, shipping, receiving, storage, and handling of items to be incorporated into nuclear power plants."

Since a portion of Northeast Utilities procurement activities involve commercial suppliers which do not fully comply with the requirements of ANSI N45.2.2, the Northeast Nuclear Energy Company Nuclear Materials and Document Management organization verifies through source inspections, receipt inspection, and/or survey activities that the quality of the materials, items, components or equipment is preserved by those suppliers to the extent that packaging, shipping, storage and handling methods are employed which are commensurate with the nature of the product.

7. ANSI N18.1-1971, paragraph 4.2.2, states in part "The Operations Manager shall hold a Senior Reactor Operator's license". NU has developed an alternative to this requirement which has been accepted by the NRC via amendment 132 for the Millstone Power Station Unit No. 3 license which allows that:

If the Operations Manager does not hold a Senior Reactor Operator license for Millstone Unit No. 3, then the Operations Manager shall have held a Senior Reactor Operator license at a pressurized water reactor, and the Assistant Operations Manager shall hold a Senior Reactor Operator license for Millstone Unit No. 3.

8. ANSI N18.1-1971, paragraph 4.2.2, states in part "The Operations Manager shall hold a Senior Reactor Operator's license". NU has developed an alternative to this requirement which has been accepted by the NRC via amendment 190 for the Millstone Power Station Unit No. 2 license which allows that:

If the Operations Manager does not hold a Senior Reactor Operator license for Millstone Unit No. 2, then the Operations Manager shall have held a Senior Reactor Operator license at a pressurized water reactor, and an individual serving in the capacity of the Assistant Operations Manager shall hold a Senior Reactor Operator license for Millstone Unit No. 2.

9. Regulatory Guide 1.33 - 2/78, regarding audits, states in part:

- (a) "The results of actions taken to correct deficiencies...at least once per 6 months."
- (b) "...technical specifications and applicable license conditions - at least once per 12 months."
- (c) "The performance, training, and qualifications of the facility staff - at least once per 12 months."

NU has developed an alternative which modifies these Audit frequencies to at least once per 24 months. This alternative has previously been accepted by the NRC via license amendments 79, 184, and 104 for MP1, MP2, and MP3, respectively.

10. Deleted

11. ANSI N45.2.13-1976, paragraph 10.3.5., states in part, "in certain cases involving procurement of services only, such as third party inspection; engineering and consulting services, and installation, repair, overhaul or maintenance work; the Purchaser may accept the service by any or all of the following methods:

- (a) Technical verification of the data produced
- (b) Surveillance and/or audit of the activity
- (c) Review of the objective evidence for conformance to the procurement document requirements such as certifications, stress reports, etc."

In order to maintain the independence requirement of the NRC's August 14, 1996 Order, NNECO will not perform an acceptance review of the work produced by the vendors contracted to conduct the Independent Corrective Action Verification Program. This work will be performed in accordance with the vendor's own approved, 10 CFR 50 Appendix B Quality Assurance Program.

12. Deleted.

13. Regulatory Guide 1.70 Revision 3, November 1978 Section 17.1.2.4 states in part: "The PSAR should include a listing of QA program procedures or instructions that will be used to implement the QA program for each major activity such as design, procurement, construction, etc. The procedure list should identify which criteria of Appendix B to 10 CFR 50 are implemented by each procedure".

NU has developed an alternative to this requirement where procedure indices are maintained which identify the procedures that implement the Quality Assurance Program for Millstone Power Station and which, by title and originating organization, indicate the Appendix B to 10 CFR 50 criterion being implemented.

14. ***ANSI N18.7-1976, Paragraph 5.2.15, "Review, Approval, and Control of Procedures," states in part: "Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable."***

NU implements administrative and programmatic controls that ensure procedures are maintained current in accordance with 10CFR50, Appendix B, thus meeting the intent of the biennial review.

NU implements administrative controls to perform biennial reviews of non-routine procedures such as EOP's, AOP's, E-Plan, Security and other procedures that may be dictated by an event.

Programmatic controls specify conditions when the mandatory review of plant procedures apply, and include a requirement to review applicable procedures following an accident or transient and following any modification to a system.

NU utilizes a pre-job briefing practice to ensure that personnel are aware of what is to be accomplished and what procedures will be used prior to beginning a job. In addition, the Procedure Compliance Policy requires that the job be stopped and the procedure be revised or the situation resolved prior to work continuing if procedures cannot be implemented as written.

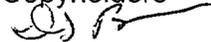
Additionally, NU Quality Assurance Program requires the review of a representative sample of plant procedures as part of routine audits and surveillances to ensure that existing administrative controls for procedure verification, review and revision are effective in maintaining the quality of plant procedures. Significant procedural deficiencies are identified and corrected through the Station Corrective Action Program. The Station Self-Assessment Program also periodically reviews selected procedures and identifies deficiencies and improvements through the Corrective Action Program.



Memo

NO-00-0219

June 26, 2000

TO: Northeast Utilities Quality Assurance Program Topical Report Controlled
Copyholders

FROM: D. S. Bruce
SUBJECT: NUQAP Topical Report Revision 21, Change 14
(Document No. MP-02-OST-BAP01)

Enclosed is NUQAP Revision 21, Change 14, which modifies NUQAP, QAP 1.0 to reflect recent organizational changes in Nuclear Technical Services. Design Engineering, as described in NUQAP Section 1.3.10, absorbs the responsibilities of configuration management, including design and configuration control and engineering assurance, previously assigned to Nuclear Engineering in Section 1.3.11. Nuclear Engineering, as described in NUQAP Section 1.3.11, absorbs the responsibilities of Reactor Engineering, previously assigned to Plant Engineering in Section 1.3.12. Change 14 also modifies Appendix E, to delete an exception to regarding NSAB quorum, that is no longer applicable due to NSAB currently meeting all required regulatory standards.

Please replace the entire contents of the existing Quality Assurance Program, OAP 1 and Appendix E, with the enclosed sections.

Change 14 changes are in ***bold and italics*** with a revision bar in the right margin. The footer of the affected section includes a reference to Change 14.

Please insert the summary of changes document in the front of your manual. Please note the effective date of the change is **June 26, 2000**.

If you have any questions, contact D. Bruce at X3185.

Attachments:

1. Summary of changes incorporated as part of Revision 21, Change 14.

Enclosure:

Change 14 to the Northeast Utilities Quality Assurance Program Topical Report Revision 21.

Summary of Changes to NUQAP Rev. 21 Incorporated as Change 14

<u>Section</u>	<u>Summary Description of Changes</u>	<u>Reference</u>
QAP 1.0	Reflects recent organizational changes in Nuclear Technical Services. Design Engineering, as described in NUQAP Section 1.3.10, absorbs the responsibilities of configuration management, including design and configuration control and engineering assurance, previously assigned to Nuclear Engineering in Section 1.3.11. Nuclear Engineering, as described in NUQAP Section 1.3.11, absorbs the responsibilities of Reactor Engineering, previously assigned to Plant Engineering in Section 1.3.12.	Request 00-09 and Request 00-10
Appendix E	modifies Appendix E, to delete an exception to regarding NSAB quorum, that is no longer applicable due to NSAB currently meeting all required regulatory standards	Request 00-08

APPENDIX E

NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP) TOPICAL REPORT - MILLSTONE POWER STATION

PROGRAM EXCEPTIONS

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A records organization exists along with written procedures addressing the control of quality assurance records.

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The requirements of ANSI N45.2.9-1974 do not apply to these "working documents" based on paragraph 1.1 of the ANSI standard which states:

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Since a portion of Northeast Utilities procurement activities involve commercial suppliers which do not fully comply with the requirements of ANSI N45.2.2, the Northeast Nuclear Energy Company Nuclear Materials and Document Management organization verifies

through source inspections, receipt inspection, and/or survey activities that the quality of the materials, items, components or equipment is preserved by those suppliers to the extent that packaging, shipping, storage and handling methods are employed which are commensurate with the nature of the product.

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- (c) "The performance, training, and qualifications of the facility staff - at least once per 12 months."

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- (a) Technical verification of the data produced
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- (c) Review of the objective evidence for conformance to the procurement document requirements such as certifications, stress reports, etc.”

In order to maintain the independence requirement of the NRC's August 14, 1996 Order, NNECO will not perform an acceptance review of the work produced by the vendors contracted to conduct the Independent Corrective Action Verification Program. This work will be performed in accordance with the vendor's own approved, 10 CFR 50 Appendix B Quality Assurance Program.

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13. Regulatory Guide 1.70 Revision 3, November 1978 Section 17.1.2.4 states in part: “The PSAR should include a listing of QA program procedures or instructions that will be used to implement the QA program for each major activity such as design, procurement, construction, etc. The procedure list should identify which criteria of Appendix B to 10 CFR 50 are implemented by each procedure”.

NU has developed an alternative to this requirement where procedure indices are maintained which identify the procedures that implement the Quality Assurance Program for Millstone Power Station and which, by title and originating organization, indicate the Appendix B to 10 CFR 50 criterion being implemented.

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NU implements administrative controls to perform biennial reviews of non-routine procedures such as EOP's, AOP's, E-Plan, Security and other procedures that may be dictated by an event.

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Additionally, NU Quality Assurance Program requires the review of a representative sample of plant procedures as part of routine audits and surveillances to ensure that existing administrative controls for procedure verification, review and revision are effective in maintaining the quality of plant procedures. Significant procedural deficiencies are identified and corrected through the Station Corrective Action Program. The Station Self-Assessment Program also periodically reviews selected procedures and identifies deficiencies and improvements through the Corrective Action Program.

1.0 ORGANIZATION

1.1 INTRODUCTION

This section describes the organizations involved in the operation and technical support of Units 2 and 3 at Millstone Nuclear Power Station (MNPS). In addition, this section describes the responsibilities governed by the Northeast Utilities (NU) Quality Assurance Program (NUQAP). Qualifications for key personnel are found in the unit Technical Specifications and Appendix B, "Qualification and Experience Requirements."

NOTE

In the remainder of QAP 1.0, the text describes station - wide functions that support Millstone Units 2 and 3. Units 2 and 3 organizations may supply services to, or use services from, the Unit 1 organization, with appropriate controls. Unit 1 is defueled and in a decommissioning mode.

Additional information on organizations supporting Unit 1, and on the quality assurance program for Millstone Unit 1, is provided in the Millstone Unit 1 Northeast Quality Assurance (NUQAP) Topical Report.

1.2 ORGANIZATION

The Chairman, President and Chief Executive Officer (CEO) of NU has ultimate responsibility and overall authority for the NU nuclear program, and has delegated the necessary responsibility and authority for all nuclear operations to the President and CEO-NNECO. In addition, Northeast Utilities Service Company (NUSCO) provides certain support services to NNECO. The President and CEO-NNECO is also the President-Generation Group of NUSCO..

1.3 KEY MANAGEMENT RESPONSIBILITIES AND AUTHORITY

1.3.1 Senior Vice President and CNO-Millstone (SVP & CNO)

The SVP & CNO has been delegated by the President and CEO-NNECO the necessary responsibility and authority for the management and direction of all activities related to the operation of MNPS. The SVP & CNO has overall responsibility for engineering, construction, operation, maintenance, modification and quality assurance including this NUQAP, at MNPS. The following licensing basis positions report directly to the SVP & CNO:

- Vice President (VP)-Nuclear Operations
- VP-Nuclear Technical Services

- VP-Nuclear Work Services
- VP-Human Services - Nuclear
- Director -Nuclear Oversight and Regulatory Affairs (NORA)

1.3.2 VP-Nuclear Operations

VP-Nuclear Operations is responsible for establishing common policies and standards pertaining to the operating units, the safe operation and maintenance of the units, and implementation of this NUQAP. The VP-Nuclear Operations is responsible for maintaining compliance with requirements of the Operating License and Technical Specifications as well as applicable federal, state and local laws, regulations and codes. The following report directly to the VP-Nuclear Operations:

- Station Director
- Maintenance

1.3.3 VP-Nuclear Technical Services

VP-Nuclear Technical Services is responsible for providing engineering services and implementation of this NUQAP. The following report directly to the VP-Nuclear Technical Services:

- Design Engineering
- Nuclear Engineering
- Plant Engineering

1.3.4 VP-Nuclear Work Services

VP-Nuclear Work Services is responsible for site services in support of the station, and implementation of this NUQAP. The following report directly to the VP-Nuclear Work Services:

- Site Services
- Nuclear Materials and Document Management
- Unit 1 General Manager

1.3.5 VP-Human Services - Nuclear

The VP-Human Services - Nuclear is responsible for human services, emergency planning, nuclear training, and the Employee Concerns Program, and implementation of this NUQAP. The following licensing basis positions report directly to the VP-Human Services - Nuclear:

- Nuclear Training Services
- Emergency Planning

1.3.6 Director-Nuclear Oversight and Regulatory Affairs (NORA)

Director-NORA is responsible for the effective performance of Nuclear Oversight and Regulatory Affairs functions. The Director-NORA acts as advisor to the SVP & CNO and President and CEO-NNECO on items related to nuclear quality and safety at the station. Overall responsibility for the NUQAP has been delegated to the Director-NORA by the SVP & CNO. These responsibilities include:

- Direction of the quality assurance program
- Development and implementation of policies, plans, requirements, procedures, and audits
- Verification to assure compliance with 10CFR50 Appendix B and other regulatory requirements
- Verification of the implementation of the NUQAP Topical Report requirements

The following report directly to the Director-NORA:

- Director-Nuclear Oversight

1.3.7 Director-Nuclear Oversight

The Director-NORA has delegated to the Director-Nuclear Oversight the necessary authority and responsibility for the following:

- Preparation and issuance of the NUQAP Topical Report
- Verification of the implementation of NUQAP requirements and of compliance with 10CFR50 Appendix B and other regulatory requirements
- Identification of quality problems
- Recommendations or solutions to quality problems and verification of the implementation of the solutions
- Independent Safety Engineering and Operating Experience programs

Verification is performed through a planned program of audits, surveillances and inspections by Nuclear Oversight. The Director-Nuclear Oversight provides objective evidence to management of the performance of quality activities independent of the individual or group directly responsible for performing the specific activity.

The Director-Nuclear Oversight has the authority and organizational freedom to verify activities affecting quality. This is performed independent of undue influences and responsibilities for schedules and costs.

In order to implement these responsibilities, the Director-Nuclear Oversight is provided "Stop Work" authority whereby he/she can suspend unsatisfactory work and control further processing or installation of non-

conforming materials. The authority to stop work is assigned to Nuclear Oversight personnel and delineated in an approved procedure.

1.3.8 Station Director

The Station Director is responsible for operations, nuclear safety, chemistry, and radiation protection activities. The Station Director is responsible for the safe and efficient operation of the units. During accident situations, if currently holding an active SRO license on the unit, the Station Director may relieve the Shift Manager of the responsibility of directing the licensed Control Room operators. The following report to the Station Director:

- Assistant Station Director-Safety
- Unit Operations
- Radiation Protection and Waste Services

1.3.9 Maintenance

The Maintenance group is responsible for on-line maintenance, cost and scheduling, outage activities, installation, maintenance, alterations, adjustment and calibration, replacement and repair of plant electrical and mechanical equipment, and instruments and controls. Responsibilities include scheduling of surveillances required by Technical Specifications, establishing standards and frequency of calibration for instrumentation and ensuring instrumentation and related testing equipment are properly used, inspected and maintained.

1.3.10 Design Engineering

The Design Engineering group is responsible for design engineering functions, supporting activities, engineering programs, and **configuration management including design and configuration control and engineering assurance**. The Unit 1 organization will share responsibility for certain systems shared between Unit 1 and Units 2 or 3.

1.3.11 Nuclear Engineering

The Nuclear Engineering group is responsible for engineering activities in safety analysis, and nuclear fuel. These activities include probabilistic risk assessment, **reactor**, radiological and radwaste engineering.

1.3.12 Plant Engineering

The Plant Engineering group is responsible for engineering technical support and systems engineering, including material engineering.

1.3.13 Site Services

The Site Services group is responsible for services in support of the station, including security and fire protection.

1.3.14 Nuclear Materials and Document Management

The Nuclear Materials and Document Management group is responsible for nuclear records management and procurement. Responsibilities include approval and oversight of vendors that provide quality-related material and services including source and receipt inspection.

1.3.15 Nuclear Training Services

The Nuclear Training Services group is responsible for operator and technical training. The operator training group reports directly to the Director-Nuclear Training Services to provide sufficient organizational freedom and independence from operating pressures as required by the unit Technical Specifications.

1.3.16 Emergency Planning

The Emergency Planning group is responsible for development and maintenance of the on-site radiological emergency plan and the development and coordination of required off-site radiological emergency response plans.

1.3.17 Assistant Station Director-Safety

The Assistant Station Director-Safety is responsible for the corrective actions program, procedures, and the shift technical advisors.

1.3.18 Unit Operations

The Unit Operations groups report to the Station Director. Each group includes the following key supervisory positions:

- Manager-Operations
- Assistant Manager-Operations
- Shift Manager(s)
- Unit Supervisor(s)

1.3.18.1 Manager-Operations and Assistant Manager-Operations

The Manager-Operations provides general supervision for the operation of the respective unit, and coordinates unit operations with maintenance, work management, and other groups. As stipulated in Technical Specifications or in Appendix B, the

Manager-Operations or the Assistant Manager - Operations holds an appropriate license on the Unit (SRO on Units 2 and 3). The Manager-Operations assures the safe and efficient operation of the assigned unit in accordance with applicable licenses, operating instructions and procedures, emergency procedures and safety rules and regulations. During accident situations, if currently holding an active SRO license on the unit, the Manager-Operations may relieve the Shift Manager of the responsibility of directing the licensed Control Room operators. The Manager-Operations delegates the necessary authority and responsibility for various duties to the Assistant Manager-Operations.

1.3.18.2 Shift Manager

The Shift Managers report to the Assistant Manager-Operations and are responsible for the Control Room command function. The Shift Manager holds an appropriate license on the unit (SRO on Units 2 and 3). The Shift Manager directs and supervises the operation of the unit. Administrative functions that detract from or are subordinate to the management responsibility for assuring the safe operation of the plant are delegated to other operational personnel not on duty in the Control Room.

During accident situations, unless properly relieved, the Shift Manager remains in the Control Room and directs the activities of the licensed operators. The Shift Manager has direct authority to shut down the respective unit if, in the Shift Manager's opinion, serious abnormal conditions exist. A Unit 3 Shift Manager fulfills the facility staff requirements of the Shift Supervisor for the Unit 3 Technical Specifications.

1.3.18.3 Unit Supervisor

The Unit Supervisor holds an appropriate license on the unit (SRO on Units 2 and 3) and supervises the operators in the Control Room. The Unit Supervisor directs activities of the licensed Control Room operators, and may operate the controls of equipment and piping systems from the Control Room or alternate station control location.

1.3.18.4 Control Operators

Control Operators hold a Reactor Operator or Senior Reactor Operator license on the unit. The Control Operators are responsible to perform the following duties:

- Start up, operate, and shut down nuclear plant equipment including, but not limited to, reactor, reactor auxiliaries, turbine generator unit and its auxiliaries as necessary to satisfy system requirements or station conditions
- Test, as scheduled, control room instruments and controls
- Maintain required logs and calculations, observe these logs for indications of faulty operation, and notify the on-duty Unit Supervisor or the Shift Manager of abnormal plant conditions

1.3.18.5 Plant Equipment Operators

Plant Equipment Operators are responsible to perform the following duties:

- Start up, operate, inspect, adjust, and shut down all auxiliary and other various plant equipment
- Perform or assist with scheduled operational tests
- Make minor repairs

1.3.19 Radiation Protection and Waste Services

Radiation Protection and Waste Services group carries out health physics functions and reports to the Station Director to provide sufficient organizational freedom and independence from operating pressures as required by the unit Technical Specifications. The Manager-Radiation Protection and Waste Services fulfills the "Health Physics Manager" position qualifications required by the unit Technical Specifications. Radiation protection services include the following:

- scheduling and conducting radiation surveys including contamination sample collection
- determining contamination levels and assigning work restrictions through radiation work permits
- maintaining records and reports on radioactive contamination levels
- administering the personnel monitoring program and maintaining required records in accordance with federal and state codes

Radiation Protection and Waste Services is also responsible for radioactive waste services.

1.4 QUALITY-RELATED RESPONSIBILITIES COMMON TO ALL DEPARTMENT HEADS

The head of each department performing quality activities is responsible for:

- Administering those activities within their organization which are required by this NUQAP;
- Ensuring implementation of the Quality Assurance Program;
- Establishing and clearly defining the duties and responsibilities of personnel within their organization who perform quality activities;
- Planning, selecting, and training personnel to meet the requirements of the NUQAP Topical Report; and
- Performing and coordinating quality activities within their department and interfacing with the Nuclear Oversight department.

Each individual performing or verifying activities affecting quality is responsible to conduct those activities in accordance with the requirements of this NUQAP and implementing procedures. These individuals shall have direct access to such levels of management as may be necessary to perform this function.

The responsibility, authority, and organizational relationship for performing quality activities within each organization is established and delineated in the NUSCO/NNECO organizational charts, policy statements, and written job or functional descriptions.

Vendors may be delegated the execution of quality assurance functions; however, NU shall retain responsibility for this Quality Assurance Program.

1.5 ANNUAL MANAGEMENT QUALITY ASSURANCE REVIEW

The SVP & CNO is responsible for the assessment of the scope, status, implementation, and effectiveness of the NUQAP. To meet this responsibility, a team of qualified individuals is appointed to perform an annual Management Quality Assurance Review. The team is made up of individuals knowledgeable in quality assurance, quality activities, auditing, management responsibilities, and the NUQAP Topical Report. This review is:

- A systematic evaluation;
- pre-planned toward the objective of determining the adequacy of the NUQAP and its compliance with Appendix B to 10 CFR 50 and other regulatory requirements; and
- capable of identifying, communicating, and tracking any required corrective action.

The SVP & CNO has delegated the responsibility for the Management Quality Assurance Review to the Director-NORA.

1.6 SPECIFIC NUQAP RESPONSIBILITIES

The SVP & CNO resolves all disputes related to the implementation of the NUQAP for which resolution is not achieved at lower levels within the organization.

1.7 SUCCESSION OF RESPONSIBILITY FOR OVERALL PLANT OPERATION

The succession to responsibility for overall plant instructions or special orders, in the event of absences, incapacitation of personnel or other emergencies, is as follows:

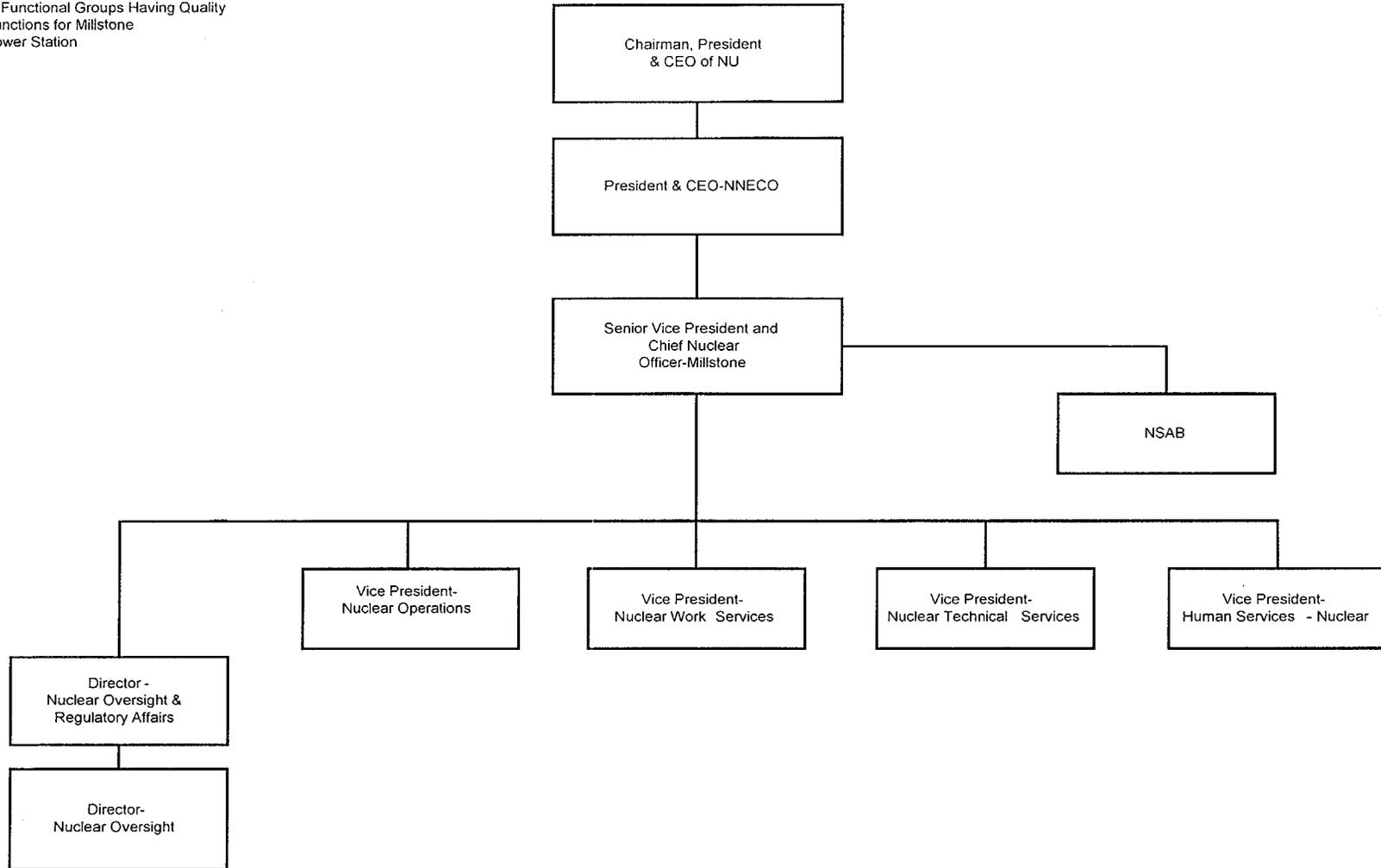
- Vice President-Nuclear Operations
- Station Director
- Licensed Manager-Nuclear Operations or Licensed Assistant Manager-Operations designated by Vice President-Nuclear Operations
- Shift Manager (SRO)
- Licensed Unit Supervisor (SRO)

1.8 ORGANIZATION CHARTS

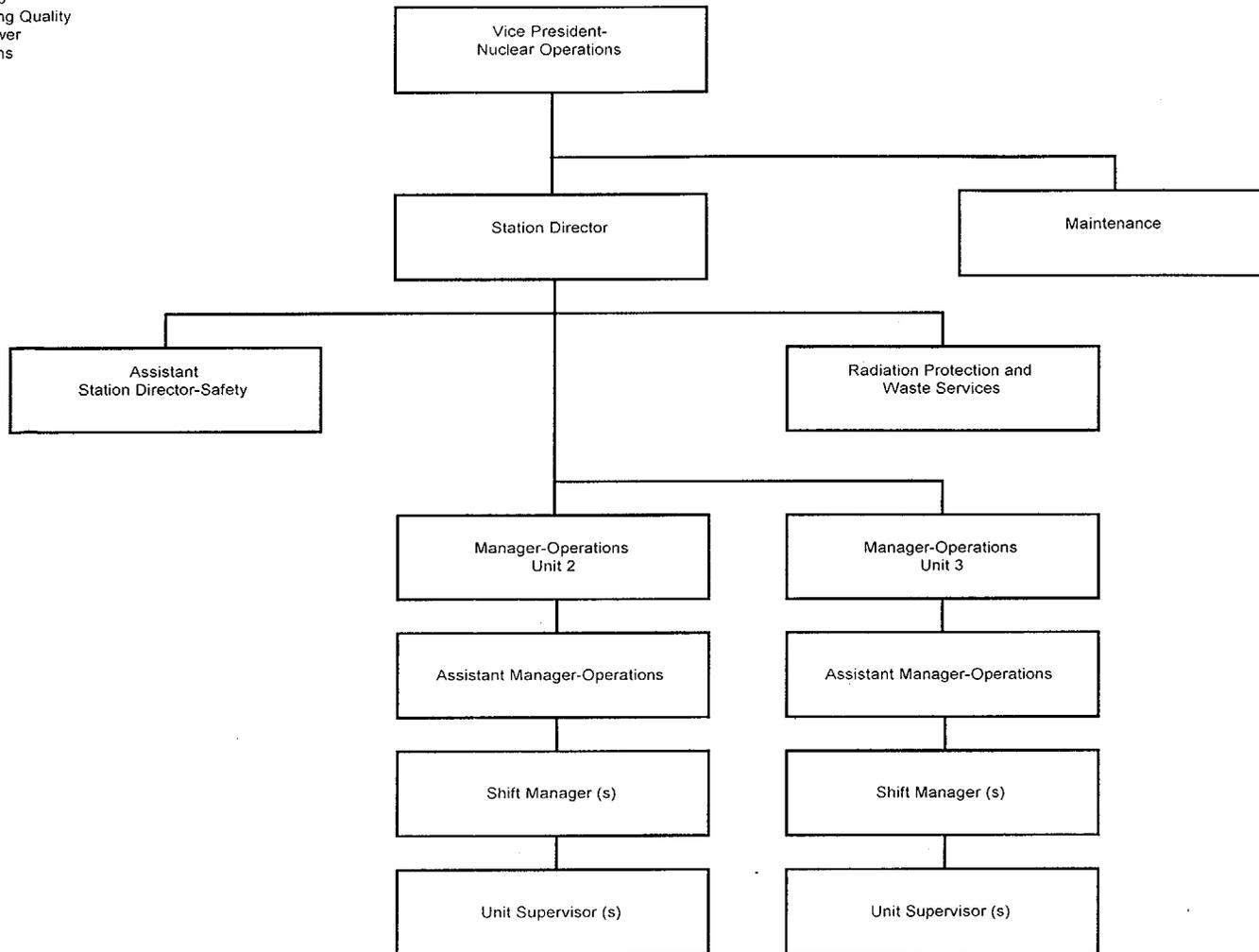
NOTE

The following organization charts are incorporated by reference in the Millstone Station Emergency Plan. Changes to these organization charts require an effectiveness review in accordance with 10 CFR 50.54 (q).

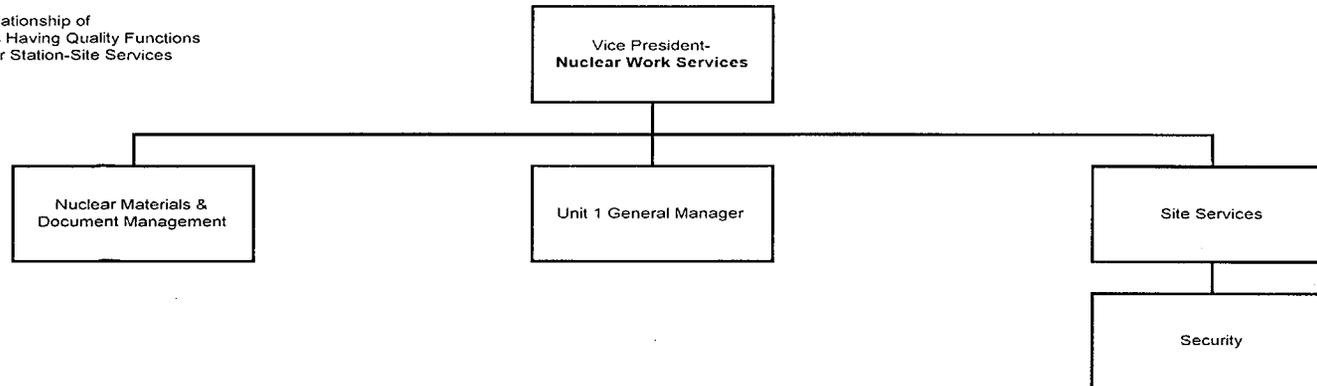
Organizational Relationship
of Functional Groups Having Quality
Functions for Millstone
Power Station



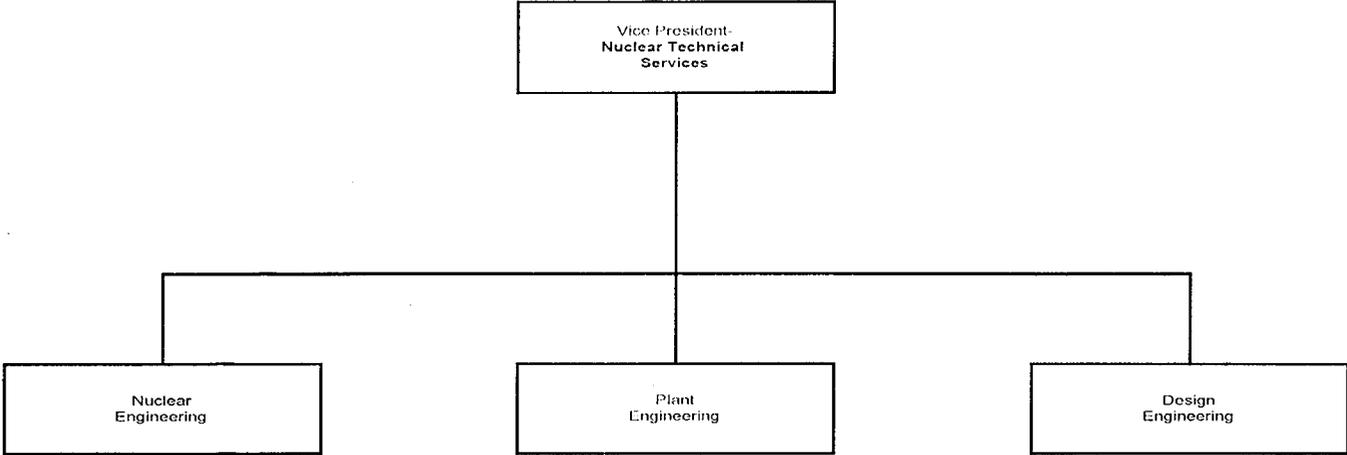
Organizational Relationship
of Functional Groups Having Quality
Functions for Millstone Power
Station - Nuclear Operations



Organizational Relationship of
Functional Groups Having Quality Functions
for Millstone Power Station-Site Services



Organizational Relationship of Functional Groups Having
Quality Functions for Millstone Power Station -
Engineering Services



Organizational Relationship of Functional Groups
Having Quality Functions for Millstone Power Station -
Human Services

