Northeast
Utilities System

Memo

NO-00-0237

July 6, 2000

TO: Northeast Utilities Quality Assurance Program Topical Report Controlled Copyholders

FROM: D. S. Bruce

SUBJECT: NUQAP Topical Report Revision 22
(Document No. MP-02-OST-BAP01)

Enclosed is Northeast Utilities Quality Assurance Program Topical Report (NUQAP), Revision 22, which was submitted to the Nuclear Regulatory Commission (NRC) on June 30, 2000, in accordance with 10CFR50.54(a)(3). No changes have been made to the content of the NUQAP since the issue of Revision 21, Change 14, on June 26, 2000, however, the entire NUQAP has been revised to Revision 22, and will serve as the basis for future changes.

Please replace the entire contents of the existing Quality Assurance Program Topical Report.

Revision 22 includes all the changes that have been made in the Change 21. There are no revision bars, as there are no changes to NUQAP content since the most recent NUQAP release of Revision 21, Change 14. To meet the requirements for the NRC submittal, **all** changes since Revision 21 (August 23, 1999) are ***bolded and italicized***. Future changes will reflect only changes made to Revision 22. Please note that the footers of all sections have been revised to reflect the current Revision.

Please remove the contents of NUQAP, Revision 21, including the Table of Contents, and replace with Revision 22. Please note the effective date of Revision 22 is **July 6, 2000**.

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

Attachments:

1. Summary of changes incorporated as part of Revision 22 (since Revision 21, original issue)

Enclosure:

Northeast Utilities Quality Assurance Program Topical Report Revision 22.

Q004

Revision 22
Summary of Changes from Rev. 21

Section	Summary Description of Changes
Abstract	• Modified to reflect the separation of Millstone Unit 1 into a separate Quality Assurance Program (QAP), by removing references to Unit 1 from this Northeast Utilities Quality Assurance Program (NUQAP). Where applicable, this document was revised to only reference Millstone Units 2 and 3.
Policy Statement	• Modified to reflect the separation of Millstone Unit 1 into a separate QAP, by removing references to Unit 1 from this NUQAP. Where applicable, this document was revised to only reference Millstone Units 2 and 3.
Introduction	• Modified to reflect the separation of Millstone Unit 1 into a separate QAP, by removing references to Unit 1 from this NUQAP. Where applicable, this document was revised to only reference Millstone Units 2 and 3.
QAP 1.0	General • QAP 1.0 has been completely revised to reflect changes made to reflect the "Strategic Realignment" of the Millstone Organization, and consolidate all organization information into the NUQAP that was previously in Final Safety Analysis Reports (FSARs), Emergency Plan, and other Licensing Basis Documents. • Inserted note to reflect new organization on a "station" basis instead of a "Unit" basis. • Modified to reflect the separation of Millstone Unit 1 into a separate QAP, by removing references to Unit 1 from this NUQAP. Where applicable, this document was revised to only reference Millstone Units 2 and 3. • Revised titles and direct reports as applicable to reflect new organization, and match corporate organizational titles. "Vice President (VP)-Engineering Services" was replaced with "VP-Nuclear Technical Services;" "Vice President - Site Services" with "Vice President - Nuclear Work Services;" and "Vice President -Human Services" with "Vice President -Human Services - Nuclear."
	Section 1.2 • Replaced Section 1.2, General, with revised Section 1.2, Organization. • Revised statements to refer to Northeast Nuclear Energy Company (NNECO) titles for officers. Deleted list of direct reports to President and Chief Executive Officer (CEO) because all quality related functions now report to the Senior Vice President and Chief Nuclear Officer (SVP & CNO). • Revised corporate officer titles based on elimination of the title of Chairman, NNECO to match corporate officer's correct (current) title. • Moved discussion of Management Quality Assurance Review to Section 1.5.
	Section 1.3. • Replaced Section 1.3, Responsibilities, and Section 1.4, Participating Groups - Millstone Power Station, with revised Section 1.3, Key Management Responsibilities and Authority, reflecting a functional organization. • Updated the scope and direct reports of SVP & CNO to reflect revised organization. Reference to the Nuclear Safety Assessment Board (NSAB) was deleted because the NSAB responsibilities are described in Appendix F. • Clarified that "licensing basis positions" only were included in the NUQAP, and eliminated positions from the NUQAP that were below the level of detail required. • Replaced "Vice President - Nuclear Oversight & Regulatory Affairs (VP-NORA)" with "Director - Nuclear Oversight & Regulatory Affairs (Director-NORA)." • Replaced individual Unit 2 and 3 Directors with Station Director to reflect current organization. • Provided sections for Design Engineering, Nuclear Engineering, Plant Engineering, Site Services and updated the sections for Nuclear Materials and Document Management.

Revision 22
Summary of Changes from Rev. 21

Section	Summary Description of Changes
	Section 1.4 • Relocated and revised section 1.4 from text in previous sections 1.3.2 through 1.3.5.
	Section 1.5 • Relocated and revised section 1.5 text from previous section 1.2.1.2. Responsibility for review changed from President and CEO to SVP & CNO.
	Section 1.6 • Relocated section 1.6 from previous section 1.2.1.3 and reassigned responsibility from President and CEO to SVP & CNO.
	Section 1.7 • Added section number 1.7 to replace text removed from Unit 3 FSAR.
	• Replaced all organization charts. New charts reflect strategic realignment of Millstone Station and provide reduced level of detail to reduce need for future changes while meeting requirements. Non-quality functions were deleted. Operations organizations shown in sufficient detail to meet requirements of Regulatory Guide (RG) 1.70, Revision 3, for details removed from Unit 3 FSAR. Revised Figures 1.0 through 1.7 to reflect changes made to Section QAP 1.0.
QAP 2.0	Section 2.0 • Separated Unit 1 Quality Assurance Program into a separate document and removed references to Unit 1 from the Units 2 and 3 (current) NUQAP. Where applicable, the NUQAP was revised to only reference Millstone Units 2 and 3. • Changed the responsible officer from President and CEO to SVP & CNO. • Deleted reference to Recovery Officer and changed responsibility from Recovery Officer - Nuclear Oversight to Director - Nuclear Oversight. • Standardized the term "Management Quality Assurance Review."
QAP 3.0	General • Relocated the Unit 1 Quality Assurance Program into a separate document. References to Unit 1 were removed from the Units 2 and 3 NUQAP. Where applicable, the NUQAP was revised to only reference Millstone Units 2 and 3.
	• "Engineering Services" was replaced with "Nuclear Technical Services" throughout Section 3.0 to reflect current organizational titles.
	Section 3.2.2 • Revised the text to refer to "on-site review committee(s)" instead of Plant Operations Review Committee/Site Operations Review Committee (PORC/SORC).
QAP 4.0	• No changes from Rev. 21.
QAP 5.0	Section 5.2.1 • Clarified the vendor review expectation to ensure compliance with NUQAP.
QAP 6.0	• No changes from Rev. 21.
QAP 7.0	Section 7.2.1 • Clarified that the American Society of Mechanical Engineers Certificate of Accreditation for Authorized Inspection Agencies is an acceptable means of evaluating the qualifications of a potential vendor (inserted paragraph "e"). • Revised sub-paragraphs (a) and (f) to use generic (functional) terms instead of specific group titles.
QAP 8.0	• No changes from Rev. 21.

Revision 22
Summary of Changes from Rev. 21

Section	Summary Description of Changes
QAP 9.0	• No changes from Rev. 21.
QAP 10.0	• No changes from Rev. 21.
QAP 11.0	• No changes from Rev. 21.
QAP 12.0	Section 12.2 • Replaced "PORC/SORC" with generic term "appropriate on-site review committee."
QAP 13.0	• No changes from Rev. 21.
QAP 14.0	• No changes from Rev. 21.
QAP 15.0	Section 15.2.2 • Corrected group title to reflect current organization.
QAP 16.0	Section 16.2 • Deleted reference to Recovery Officers. • Changed responsible officer from President and CEO to SVP & CNO.
QAP 17.0	• No changes from Rev. 21.
QAP 18.0	Section 18.2 • Changed responsible officer from President and CEO to SVP & CNO.
Appendix A	• Removed references to Unit 1 from the Units 2 and 3 (current) NUQAP. • Clarified the relationship between Master Equipment Parts List and quality software.
Appendix B	• Expanded the scope of the appendix to encompass American National Standards Institute (ANSI) standard commitments formerly in Unit 3 FSAR. Headings and explanatory text added. • Deleted the position of Recovery Officer Nuclear Oversight. • Added table B-1 and associated notes to replace corresponding information formerly in Unit 3 FSAR. Position titles updated to reflect Strategic Realignment, for Units 2 and 3 only. Note: Only positions previously listed in FSAR, or corresponding to those previously listed, are included.
Appendix C	• Removed references to Unit 1 from the Units 2 and 3 NUQAP. • Rephrased the commitment to clarify application of RG 1.70 to Unit 2 FSAR; and corrected typographical errors.
Appendix D	• Added the definition for "group." • Added the word "have" to the second line of the definition of "Significant Condition Adverse to Quality" (to correct an error that occurred in a previous NUQAP change). • Corrected typographical changes.
Appendix E	• Deleted an exception no longer applicable due to current procedure/process for NSAB-meets ANSI N18.7-1976 requirements. • Deleted an exception no longer applicable, because of change in Unit 1 Technical Specifications that eliminated the need for Senior Reactor Operator (SRO) licenses in the Unit's defueled state. Unit 1 has their own QAP. • 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." The change was a reduction in commitment submitted to the NRC for approval (Reference letter B17940), and approved by the NRC on May 8, 2000.

Revision 22
Summary of Changes from Rev. 21

Section	Summary Description of Changes
Appendix F	• Separated Unit 1 Quality Assurance Program into a separate document and removed references to Director - Unit 1, Vice President - Nuclear Operations. This NUQAP was revised to only reference Millstone Units 2 and 3. • Replaced the title "Vice President - Nuclear Oversight and Regulatory Affairs (NORA)" with the title of "Director - Nuclear Oversight and Regulatory Affairs (NORA)," with no change in responsibilities. • Reference to Unit 1 PORC was removed from this NUQAP (Units 2 and 3). • Changed title from Unit Director to Station Director, to reflect Strategic Realignment, throughout the section on Unit 2 PORC. • Deleted reference to Millstone Unit 2 Recovery Officer. • Changed the SORC composition to reflect new title for Director - Unit 1 Operations; provide the NOTE for filling positions of Unit 2 Designated Manager and Unit 3 Designated Manager, and references to the note; substitute the Manager, Radiation Protection and Waste Services in place of the position of Designated Manager, Nuclear Services; update the title of Director - Site Services; and adjust the "senior designated unit manager" definition to fit other changes. • Combined the Unit 2 and 3 PORCs and their related roles and responsibilities into one PORC. The combined PORC is called the "Unit 2/3 PORC." • Provided clarification where required, based on the combination of the Units 2 and 3 PORC. • Revised the senior officer responsible for NSAB from President and CEO to SVP & CNO; several references throughout the text. • Made required editorial changes to clarify various statements and eliminate [bracketed] references to Technical Specification sections that were deleted under License Amendments 239 (Unit 2) and 173 (Unit 3), NUQAP Change 16.
Appendix G	• Added Section to cross reference Technical Specification positions.

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

Northeast Utilities (NU) has developed, and is implementing, a comprehensive Quality Assurance Program for the Millstone Power Station to assure conformance with established regulatory requirements set forth by the Nuclear Regulatory Commission (NRC) and accepted Industry standards. The participants in this Quality Assurance Program assure that the design, fabrication, procurement, construction, testing, operation, refueling, maintenance, repair and modification of ***Millstone Units 2 and 3*** are performed in a safe and effective manner.

This Quality Assurance Program (NUQAP) Topical Report complies with the requirements set forth in Appendix B of 10 CFR 50, along with applicable sections of the Safety Analysis Report (SAR) for each license application, and is responsive to the United States NRC Regulatory Guide 1.70, which describes the information required to be presented in the Quality Assurance section of the SAR's for nuclear power plants.

This NUQAP applies to Millstone Units 2 and 3, and to associated support services. This NUQAP is also established, maintained, and executed with regard to radioactive material transport packages as allowed by 10 CFR 71.101(f). Quality Assurance provisions for Fire Protection activities are detailed in the Northeast Utilities Fire Protection Program. ***Quality Assurance provisions for Millstone Unit 1 are governed by a separate program.***

This NUQAP applies in its entirety to all activities affecting the safety-related functions of structures, systems, and components ***in Millstone Units 2 and 3***. Safety-Related structures, systems, and components are functionally identified in Appendix A of this NUQAP and are designated Category I by Northeast Utilities. Applicability of Appendix A to each FSAR is addressed by existing nuclear unit specific design bases and licensing commitments, and also as specifically identified in each FSAR addressing Section 3.2.1 of Regulatory Guide 1.70. This NUQAP is also applicable in its entirety to materials, equipment, parts, consumables, and services designated as Category I. This NUQAP is applicable to other quality programs including Anticipated Transient Without Scram (ATWS) Quality Assurance, which is applicable to MP-2 only (MP-3 commits to Generic Letter 85-06) and *to* Electrical Equipment Qualification (EEQ), as defined by NU commitments. Portions of this NUQAP are also applicable to Fire Protection Quality Assurance (FPQA), Station Blackout Quality Assurance (SBOQA) and Radwaste Quality Assurance (RWQA), which are delineated in applicable program manuals and procedures. Quality Assurance provisions for primary chemistry laboratory activities are detailed in the Northeast Utilities Nuclear Chemistry Laboratory Quality Assurance Manual.

This NUQAP is committed to utilize the guidance obtained from the regulatory documents and their endorsed standards identified in Appendix C of this NUQAP Topical Report.

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

This Northeast Utilities Quality Assurance Program (NUQAP) Topical Report has been developed to achieve quality assurance in all activities affecting the safe operation of ***Millstone Units 2 and 3.*** The policies, requirements and tasks contained in this program description have been developed to achieve quality assurance during activities that apply to the design, fabrication, procurement, construction, testing, operation, refueling, maintenance, repair, and modification of Millstone Units 2 and 3.

Northeast Utilities procedures which implement this program are described in various manuals.

This NUQAP applies in its entirety to all activities affecting the safety-related functions of structures, systems, and components ***of Millstone Units 2 and 3***. Safety-Related structures, systems and components are functionally identified in Appendix A of this NUQAP and are designated Category I by Northeast Utilities. Applicability of Appendix A to each FSAR is addressed by existing nuclear unit specific design bases and licensing commitments, and also as specifically identified in each FSAR addressing Section 3.2.1 of Regulatory Guide 1.70. This NUQAP is also applicable in its entirety to materials, equipment, parts, consumables, and services designated as Category I. This NUQAP is also applicable to other quality programs including Anticipated Transient Without Scram (ATWS) Quality Assurance, which is applicable to ***MP-2*** only (MP-3 commits to Generic Letter 85-06), and ***to*** Electrical Equipment Qualification (EEQ), as defined by NU commitments. Portions of this NUQAP are also applicable to Fire Protection Quality Assurance (FPQA), Station Blackout Quality Assurance (SBOQA) and Radwaste Quality Assurance (RWQA) which are delineated in applicable program manuals and procedures. Quality Assurance provisions for primary chemistry laboratory activities are detailed in the Northeast Utilities Nuclear Chemistry Laboratory Quality Assurance Manual. ***Quality Assurance provisions for Millstone Unit 1 are governed by a separate program.***

The development and overall responsibility for this program lies with the President and CEO-NNECO, as delegated by the Chairman, President Chief Executive Officer of Northeast Utilities. Corporate authority is delegated to the Director - Nuclear Oversight for the preparation and administration of this NUQAP Topical Report. Individual Vice Presidents are responsible for the implementation of their portion of this program. Audits of this program are the responsibility of the Director - Nuclear Oversight.

Any revisions or additions shall be approved by affected departments prior to the incorporation of such changes into the program. Final approval of revisions or additions to this Policy Statement rests with the President and CEO-NNECO.

B W Kenyon 6/30/00

President and CEO-NNECO

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

This Northeast Utilities Quality Assurance Program (NUQAP) Topical Report contains the quality assurance requirements which are relevant to the safety of Millstone Station ***Units 2 and 3***. This NUQAP Topical Report consists of three parts:

1. Introduction, which defines the purpose of the Topical Program and summarizes its scope and applicability;

2. The NUQAP, which is applicable in its entirety to all activities affecting the safety-related functions of structures, systems, and components ***in Millstone Units 2 and 3***. Safety-Related structures, systems, and components are functionally identified in Appendix A of this NUQAP and are designated Category I by Northeast Utilities. Applicability of Appendix A to each FSAR is addressed by existing nuclear unit specific design bases and licensing commitments, and also as specifically identified in each FSAR addressing Section 3.2.1 of Regulatory Guide 1.70. This NUQAP is also applicable in its entirety to materials, equipment, parts, consumables, and services designated as Category I. This NUQAP is applicable to other quality programs including Anticipated Transient Without Scram (ATWS) Quality Assurance, which is applicable to MP-2 only (MP-3 commits to Generic Letter 85-06), and to Electrical Equipment Qualification (EEQ), as defined by NU commitments. Portions of this NUQAP are also applicable to Fire Protection Quality Assurance (FPQA), Station Blackout Quality Assurance (SBOQA) and Radwaste Quality Assurance (RWQA) which are delineated in applicable program manuals and procedures.

3. Appendices, which provide supporting statements and tabulations.

This NUQAP Topical Report has been prepared to document that a quality assurance program has been established and implemented to assure that adequate quality requirements are being complied with to safeguard NU employees, contracted personnel and the public during the life of the operating Millstone Station nuclear power plants. ***Quality Assurance provisions for Millstone Unit 1 are governed by a separate program.*** In addition, there are other programs to safeguard NU employees, contracted personnel, and the public.

The controls which implement the actions identified in this NUQAP are procedures and instructions which delineate actions and steps necessary to accomplish quality requirements. Procedures and instructions are written by groups, divisions, departments, branches, or sections which have the responsibility for implementing actions as assigned by this NUQAP. Quality procedures and revisions thereto are reviewed by and concurred with by Nuclear Oversight in accordance with QAP 2.0, "Quality Assurance Program" and QAP 5.0, "Procedures, Instructions, and Drawings".

This NUQAP is responsive to applicable codes, Nuclear Regulatory Commission regulatory requirements, accepted industrial standards and revisions thereto. Provisions are established to update this NUQAP Topical Report in accordance with revisions to codes, standards and regulatory requirements, and to inform cognizant personnel to implement appropriate action to assure the highest standard of quality is achieved for structures, systems, components, and services for the Millstone Station nuclear power plants.

Michael F. Ahern 6/30/00
M.F. Ahern

Director - Nuclear Oversight

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 opinior, 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:

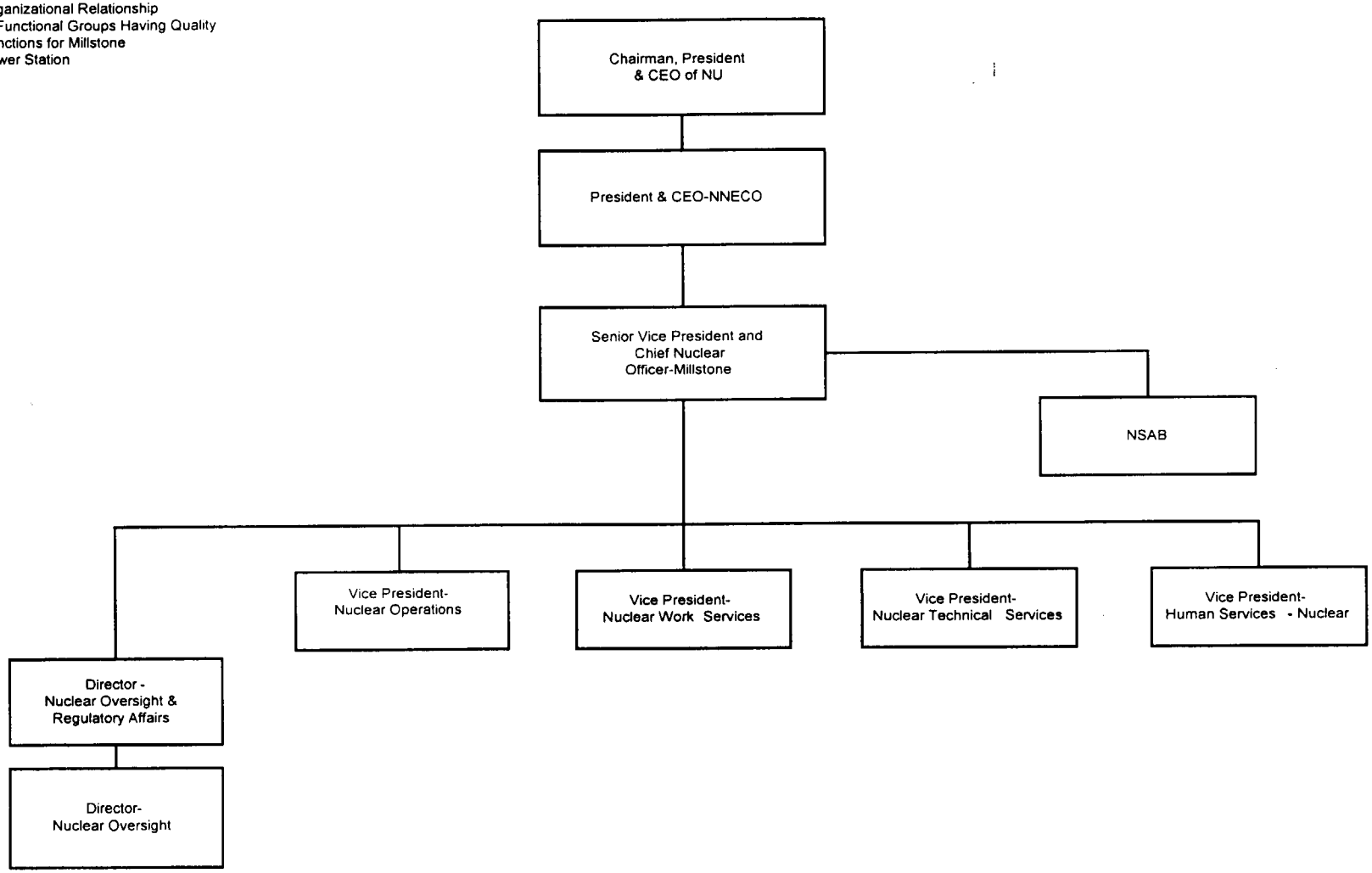
- *Vice President-Nuclear Operations*
- *Station Director*
- *Licensed Manager-Nuclear Operations or Licensed Assistant Manager-Operations designated by Vice President-Nuclear Operations*
- *Shift Manager (SRO)*
- *Licensed Unit Supervisor (SRO)*

1.8 ORGANIZATION CHARTS

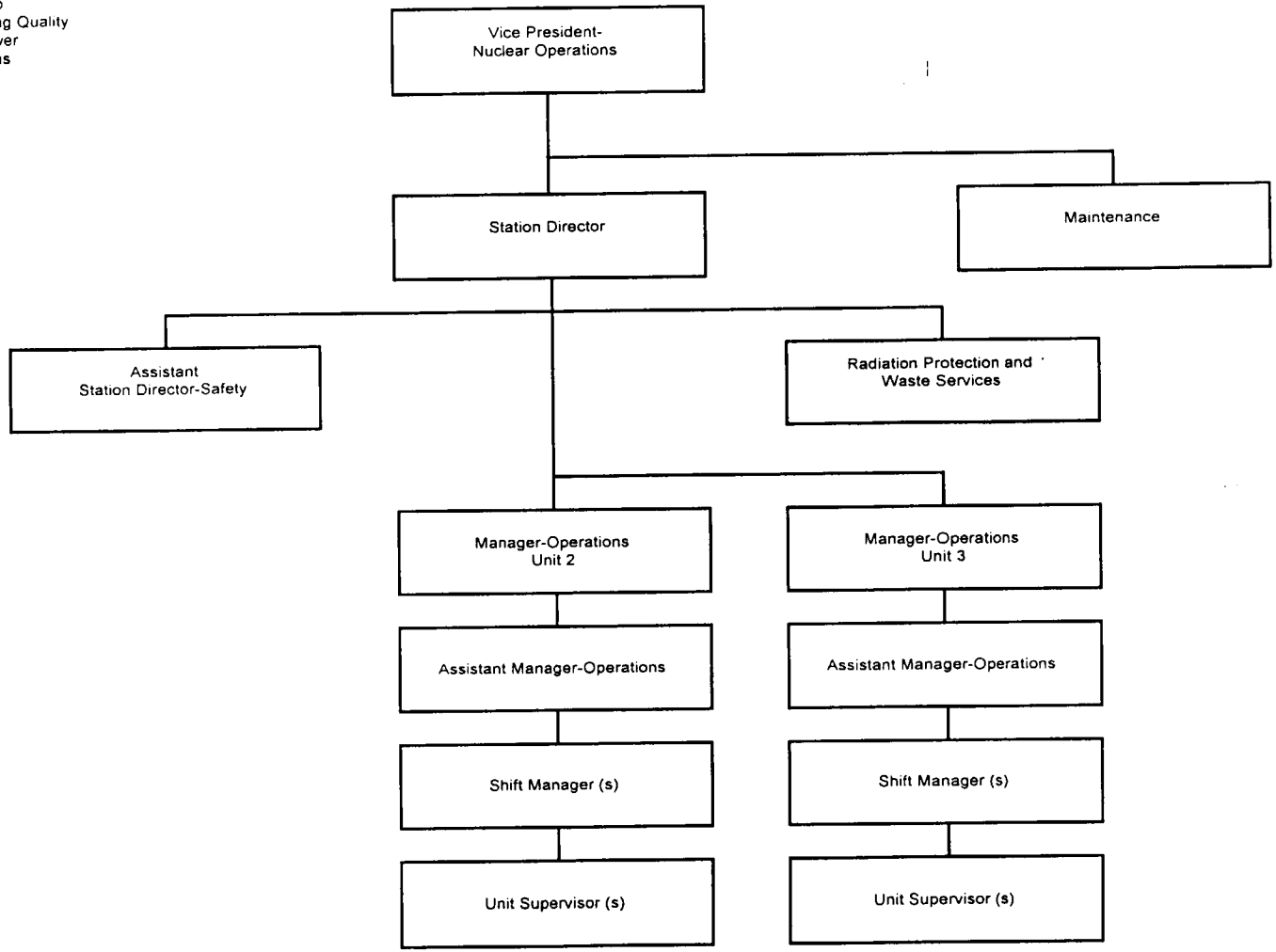
NOTE

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).

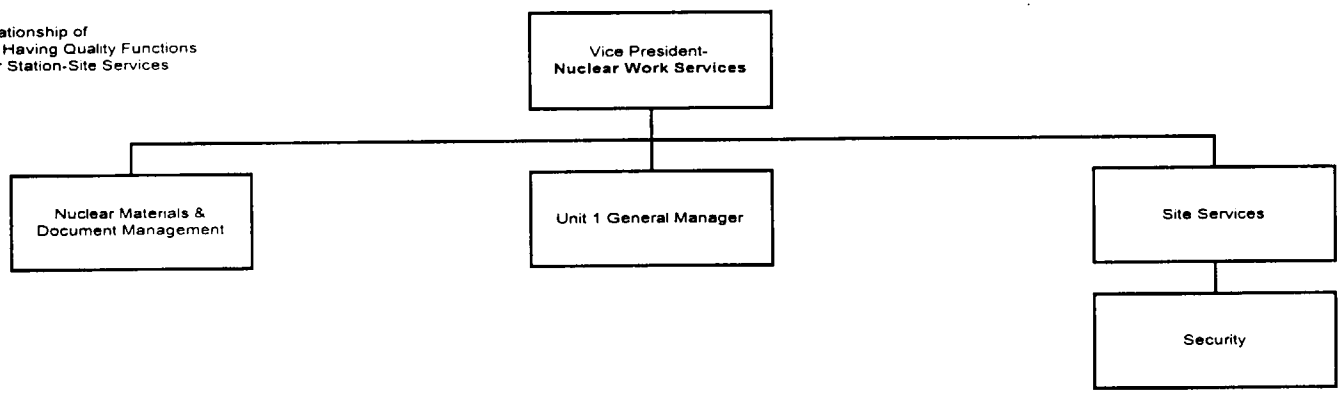
Organizational Relationship
of Functional Groups Having Quality
Functions for Millstone
Power Station



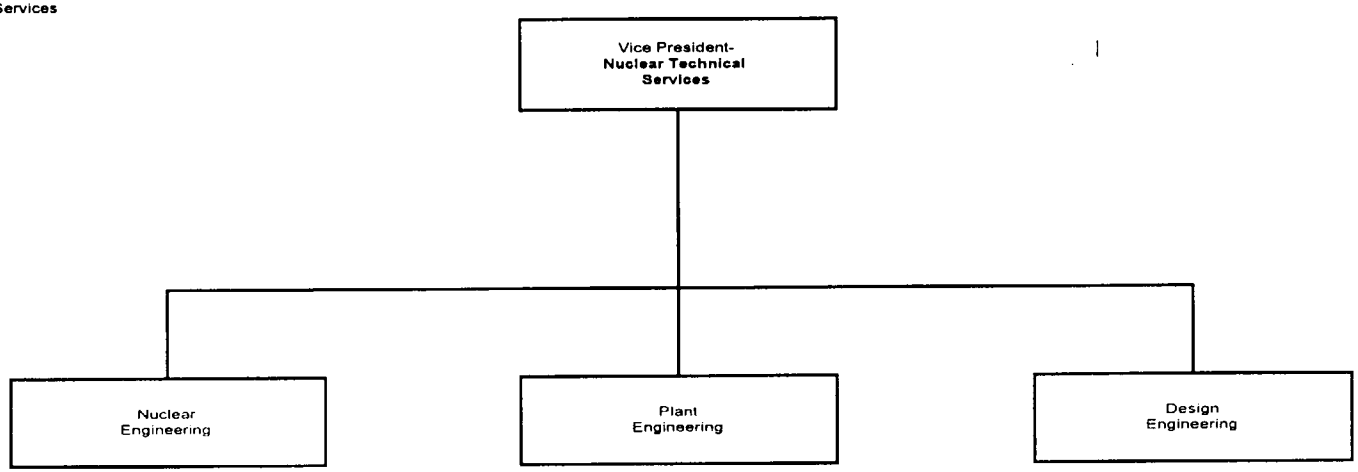
Organizational Relationship
of Functional Groups Having Quality
Functions for Millstone Power
Station - Nuclear Operations



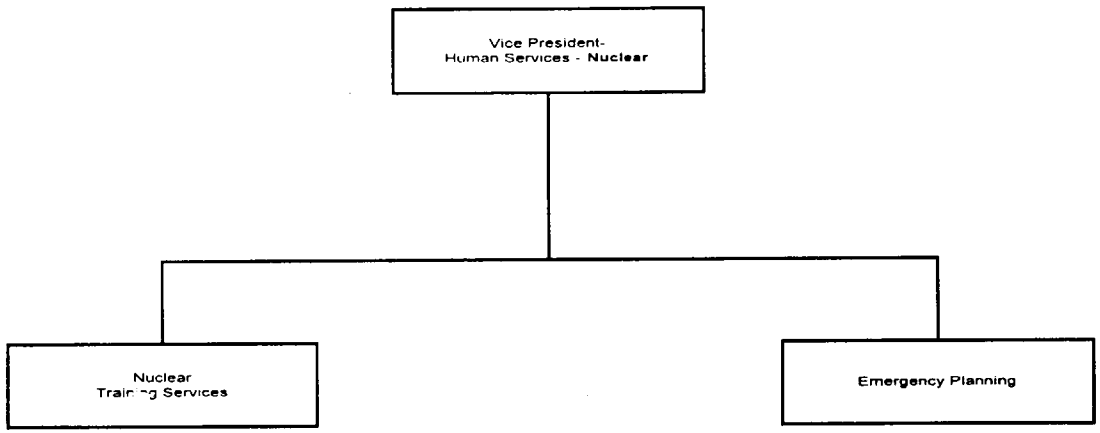
Organizational Relationship of
Functional Groups Having Quality Functions
for Millstone Power Station-Site Services



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



2.0 QUALITY ASSURANCE PROGRAM

2.1 GENERAL REQUIREMENTS

Northeast Utilities (NU) has established a Quality Assurance Program (NUQAP) for the Millstone Power Station which complies with the criteria of 10CFR50, Appendix B, and follows the regulatory documents and their endorsed ANSI/IEEE standards identified in Appendix C with exceptions as identified in Appendix E. The quality assurance requirements set forth in the attached Policy Statement, supplemented by quality assurance procedures, provide the primary basis of this program and the NU policy with regard to quality assurance for the Millstone Station nuclear power plants. This NUQAP Topical Report is established to accomplish the required level of quality in activities carried out throughout the life of the Station's operating nuclear power plants.

This NUQAP applies in its entirety to all activities affecting the safety-related functions of structures, systems and components of Millstone Units 2 and 3. Safety-Related structures, systems and components are functionally identified in Appendix A of this NUQAP and are designated Category I by Northeast Utilities. Applicability of Appendix A to each FSAR is addressed by existing Nuclear Unit specific Design Bases and Licensing commitments, and also as specifically identified in each FSAR addressing Section 3.2.1 of Regulatory Guide 1.70. This NUQAP is also applicable in its entirety to materials, equipment, parts, consumables and services designated Category I.

This NUQAP applies to other quality programs including Anticipated Transient Without Scram (ATWS) Quality Assurance, which is applicable to MP-2 only (MP-3 commits to Generic Letter 85-06), and to Electrical Equipment Qualification (EEQ), as defined by NU commitments. Portions of this NUQAP are also applicable to Fire Protection Quality Assurance (FPQA), Station Blackout Quality Assurance (SBOQA) and Radwaste Quality Assurance (RWQA) which are delineated in applicable procedures. ***Quality Assurance provisions for Millstone Unit 1 are governed by a separate program.***

The Materials, Equipment, and Parts List (MEPL) Program provides instructions to identify structures, systems, components, materials, equipment, parts, consumables, quality software and activities that need to be identified as safety-related or augmented quality. ***For quality software, the Software Quality Assurance (SQA) Program provides instructions to classify software and describe the appropriate level of documentation that is warranted for software used to support those functions of structures, systems, and components that are affected by the NUQAP.***

The requirements of this NUQAP are implemented by Northeast Utilities Service Company (NUSCO), the Northeast Nuclear Energy Company (NNECO) which operates Millstone Power Station, and their vendors performing activities affecting quality structures, systems, and components of the Station's nuclear power plants.

Procedures define the required indoctrination and training of personnel performing activities affecting quality, as necessary, to assure that suitable proficiency is achieved and maintained.

Training sessions are documented. The content of the training sessions is described, attendees and attendance date indicated, and the results (e.g., examination results) of the training sessions recorded, as applicable.

Periodic program review of the status and adequacy of this NUQAP is accomplished by Nuclear Oversight audits, surveillances and inspections, by Nuclear Safety Assessment Board (NSAB) reviews, and by the independent review team which performs the annual ***Management Quality Assurance Review*** described herein and in QAP 1.0, "Organization", ***Section 1.5***. Organizations outside NU are required to review the status and adequacy of that part of this NUQAP for which they have been delegated responsibility.

2.2 IMPLEMENTATION

2.2.1 GOALS AND OBJECTIVES

The goals of this NUQAP are to maintain quality levels in an effective and efficient manner and to assure a high degree of functional integrity and reliability of Station nuclear power plant quality structures, systems, and components. To meet these goals, the following objectives of this NUQAP have been defined:

a. Define, through procedures, the quality activities that apply to design, fabrication, procurement, construction, testing, operation, refueling, repair, maintenance and modification of the Station nuclear power plants;

b. Establish, assign, and document the responsibilities for the conduct of those activities affecting quality structures, systems, and components;

c. Establish confidence that (a) quality activities for the Station nuclear power plants are performed consistent with NU policies and (b) quality activities are performed by qualified personnel, and are verified through a system of audits, surveillances, and inspections of those organizations with quality responsibilities;

d. Apprise the ***Senior Vice President and Chief Nuclear Officer - Millstone (SVP & CNO)*** of unresolved problems and trends which could have a significant effect on nuclear power plant safety.

2.2.2 PROGRAM DOCUMENTATION

This NUQAP defines the NU nuclear policies, goals, and objectives, and is used as guidance for the development of the various division, department, branch, or section procedures. Revisions to this NUQAP

shall be made as needed to reflect current requirements and descriptions of activities prior to implementation. These revisions shall be made in accordance with a NNECO Procedure.

Revisions to this NUQAP, which reduce commitments previously accepted by the NRC, are submitted to the NRC for review and approval prior to implementation.

Revisions which do not reduce previously accepted commitments are periodically submitted to the NRC as required by 10 CFR 50.54 (a)(3) and 10 CFR 50.55 (f)(3).

Quality procedures are developed by the departments performing quality activities. These procedures are reviewed for concurrence by the departments which are responsible for implementing portions of these procedures and are approved by the initiating department. The Nuclear Oversight Department reviews other department quality procedures for compliance with this NUQAP and concurs with such procedures as described in QAP 5.0, "Procedures, Instructions and Drawings". Changes to procedures are subjected to the same degree of control as that utilized in the preparation of the original document.

Each Vice President and Director is responsible for implementation of this NUQAP within their organization which includes individual departmental procedure requirements applicable only to their respective activities. In addition, they are responsible for the preparation, approval, and distribution of those instructions, operating procedures, testing procedures, or other instructions where further guidance is necessary.

2.2.3 STRUCTURES, SYSTEMS AND COMPONENTS

This NUQAP applies to all activities affecting the safety-related functions of the structures, systems and components as addressed in the Safety Analysis Reports (SARs). Safety-Related structures, systems, and components are functionally identified in Appendix A and also as specifically identified in each FSAR addressing Section 3.2.1 of NRC Regulatory Guide 1.70.

For structures, systems and components covered by the ASME Code, NUSCO/NNECO procedures describe the measures taken to assure that the quality assurance requirements contained in the code are supplemented by the specific guidance of the applicable regulatory guides and endorsed ANSI standards listed in Appendix C.

For structures, systems and components, regulatory commitments and NUSCO/NNECO procedures describe the measures taken to assure that the quality assurance requirements are met.

The degree of control over activities affecting quality structures, systems, and components is consistent with their importance to safety. Such controls include use of appropriate equipment, establishment of suitable environmental conditions, and assurance that all prerequisites for a given activity have been satisfied. This NUQAP provides controls over special processes and skills necessary to attain the required quality, and the need for verification of quality by inspection and test.

The Nuclear Oversight Department and applicable NUSCO/NNECO technical organizations jointly determine and identify the extent quality assurance controls are applied to quality structures, systems, and components. The quality assurance controls are in conformance with this NUQAP, which complies with the 18 criteria set forth in Appendix B to 10 CFR 50.

2.2.4 PARTICIPATING ORGANIZATIONS

The organization for Millstone Power Station activities affecting the quality of structures, systems, and components is identified in QAP 1.0, "Organization", which also briefly describes assigned responsibilities.

The Nuclear Oversight Department is responsible for: a) the development, coordination, and administrative control of this NUQAP including coordination of Nuclear Oversight Department procedure review and approval; b) assuring issuance of this NUQAP Topical Report as a controlled document (as described in QAP 6.0, "'Document Control", and; c) the review and concurrence with quality procedures and revisions written by other departments. Procedure reviews shall be performed in accordance with QAP 5.0, "Procedures, Instructions, and Drawings".

Northeast Utilities (NU) requires that its approved vendors performing quality activities invoke upon their subvendors, via purchase orders/contracts, requirements for a quality assurance program to meet the applicable criteria of Appendix B to 10 CFR 50, including the applicable elements of the regulatory guides and their endorsed ANSI/IEEE standards identified in Appendix C. However, NU retains overall responsibility for the Millstone Power Station Quality Assurance Program. The specific quality activities performed by these organizations are specified in the procurement documents. Nuclear Materials and Document Management is responsible for the review and approval of these vendors' quality assurance programs prior to initiation of contracted activities.

The object of the review is to verify that these vendors have an adequate quality assurance program to meet applicable requirements of 10 CFR 50, Appendix B.

In addition to the initial review, Nuclear Materials and Document Management is responsible for the subsequent performance, as appropriate, of audits, surveillances, and inspections of approved vendor's quality assurance programs to assure continued implementation of quality requirements. Nuclear Materials and Document Management assures that the quality assurance programs of vendors that perform quality activities are periodically reviewed to assure that the vendors are implementing adequate programs. Evaluation, review, and monitoring of vendor quality programs is conducted in accordance with section QAP 7.0, "Control of Purchased Material, Equipment and Services".

Vendors may be delegated the execution of quality assurance functions by Contract. These Contracts are reviewed and approved in accordance with this NUQAP. These vendors may be contracted to perform quality activities under their approved quality assurance program or directly under the requirements of this NUQAP.

2.2.5 INDOCTRINATION AND TRAINING

A program is established and maintained for quality assurance indoctrination and training which provides confidence that the required level of personnel competence and skill is achieved and maintained in the performance of quality activities. Quality procedures delineate the requirements for an indoctrination program to assure that personnel responsible for performing quality activities are instructed in the purpose, scope, and implementation of quality procedures and that compliance to these documents is mandatory. Each NUSCO/NNECO Department is responsible for assuring assigned personnel who perform quality activities have been appropriately indoctrinated and trained.

Nuclear training programs shall be developed and implemented to provide training for all individuals attached to or associated with the Station nuclear power plants. Additional guidance is established in NUSCO/NNECO procedures.

Procedures describe the nuclear training program requirements which assure that:

a. Documentation of formal training and qualification programs includes the objective, content of the program, attendees, date of attendance; and results (e.g., examination results), as applicable.

b. Proficiency of personnel performing and verifying activities affecting quality is established and maintained. Personnel proficiency is established and maintained by training, examination/testing, and/or certification based upon the requirements of the activity. Acceptance

criteria are developed to determine if individuals are properly trained and qualified;

c. Certificates or other documentation of qualification clearly delineate the specific functions personnel are qualified to perform and the criteria used to qualify personnel in each function.

This program also requires the head of each department to be responsible for a training plan which assures that personnel performing quality activities are trained in the principles and techniques of the activity being performed.

2.2.6 MANAGEMENT PARTICIPATION

Millstone Power Station Vice Presidents and Directors are responsible for implementing this NUQAP within their organization. The ***Director - Nuclear Oversight*** will assist in development, coordination, and review of the program.

The ***SVP & CNO*** assures that a management review of this NUQAP is conducted on an annual basis by an independent team to assess the scope, status, implementation, and effectiveness, and to assure compliance with NRC licensing commitments. ***The SVP & CNO has delegated the responsibility for the management review to the Director NORA.***

Actions considered by the ***Management Quality Assurance Review*** may include, but are not limited to:

a. Review of selected procedures and documents;

b. Verification of the implementation of selected procedural requirements;

c. Review of past audit results and other inspection/review results such as those from previous ***Management Quality Assurance Reviews,*** the NRC or other departments.

The Management ***Quality Assurance*** Review's findings of deficiencies and recommendations for program improvement are forwarded to the ***SVP & CNO*** who shall assure appropriate corrective action is taken.

3.0 DESIGN CONTROL

3.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure that the applicable design requirements, such as design bases, regulatory requirements, codes, technical standards and quality standards, are identified in design documents which are reviewed, approved and controlled in accordance with procedures. Such measures include review for suitability of application of materials, equipment, parts and processes that are essential to the functions of quality structures, systems, and components. Changes to, and deviations from specified requirements are identified, documented and controlled.

Nuclear Technical Services is responsible for controlling design work, administering design control activities (including design interface) and design modifications for quality structures, systems, and components.

The responsibility for administration of the design control program for the Millstone Station nuclear power plants rests with ***Nuclear Technical Services***. The division of responsibilities and jurisdictional boundaries for design control program implementation are set forth in NUSCO/NNECO procedures. Although other organizations may be delegated the task of establishing and executing the design control program or any part thereof, ***Nuclear Technical Services*** shall retain overall responsibility for the program. The applicable requirements of this NUQAP shall be imposed on other organizations delegated the task of establishing or executing the design control program in accordance with QAP 4.0, "Procurement Document Control" and QAP 7.0, "Control of Purchased Material, Equipment and Services".

The interface controls, both internal and external, for organizations performing design work for quality structures, systems, and components are identified and implemented in accordance with procedures. This identification includes those organizations providing criteria, designs, specifications and technical direction.

Measures are applied to verify the adequacy of design. The extent of design verification is specified and documented by the responsible organization. The individuals performing design verification should not (1) have immediate supervisory responsibility for the individual performing the design, (2) have specified a singular design approach, (3) have ruled out certain design considerations, or (4) have established the design inputs for the particular design aspect being verified. The independent design verification should not dilute or replace the responsibility of the supervisors for the quality of work performed under their supervision. Where changes to previously verified designs have been made, design verifications are required for the change, including evaluation of the effects of those changes on the overall design. Design verification may be accomplished by testing. Tests to demonstrate adequacy under adverse design conditions shall comply with the requirements of QAP 11.0, "Test Control." Design errors and

deficiencies which adversely affect quality structures, systems, and components in the design process are documented and appropriate corrective action is taken. These design errors and deficiencies are documented in accordance with design change procedures or as defined in QAP 15.0, "Nonconforming Material, Parts, Components, or Services" and/or QAP 16.0, "Corrective Action".

3.2 IMPLEMENTATION

Nuclear Technical Services is responsible for the design, design review, engineering approval of design changes, design evaluation and design control for the units. ***Although some portion of the design process may be delegated to other organizations, Nuclear Technical Services has the responsibility for overall design and final engineering decisions and design control of quality structures, systems, and components.***

Nuclear Oversight performs audits, surveillances, and inspections, as appropriate, to verify that NUSCO/NNECO departments are effectively complying with this NUQAP and procedural requirements for design control. Additionally, audits, surveillances and inspections are performed, as appropriate, to verify that vendors are effectively complying with their quality assurance program requirements for design control.

3.2.1 DESIGN PROCESS

Design control measures are applied to design analyses, such as, reactor physics, stress, thermal, hydraulic, nuclear radiation, accident and seismic analyses; compatibility of materials; accessibility for in-service inspection, maintenance, and repair; and delineation of acceptance criteria for inspections and test. Measures established to control design documents are described in QAP 6.0, "Document Control".

Program procedures and instructions define the method of implementing design control measures. These measures require that applicable design requirements, such as, design bases, regulatory requirements, codes and standards, are translated into specifications, drawings, procedures or instructions. Procedures and instructions further require that appropriate quality standards are specified and included in design documents. Materials, equipment, parts and processes, including standard "off the shelf" commercial or previously approved items essential to quality functions are selected and reviewed for suitability of application. The basis for selection may include industry standards, material and prototype hardware testing programs, and design review.

Procedures assure that a documented check is performed to verify the accuracy and completeness of design drawings and specifications before release for procurement, fabrication or construction. Design drawings receive a documented check to verify dimensional accuracy.

Design drawings and specifications issued for design changes are reviewed for completeness and accuracy before release to operations, in accordance with design control procedures.

Procedures describe the provisions to assure that design drawings and specifications are prepared, reviewed and approved in accordance with NUSCO/NNECO requirements and that the documents contain the necessary quality assurance requirements, such as inspections and test requirements, acceptance requirements, and the extent of documenting inspection and test results.

3.2.2 DESIGN CHANGE CONTROL

Procedures and instructions governing design change control during modifications to the Station nuclear plants, the control of discrepant or deficient design conditions, and the reporting of unsatisfactory performance provide for the identification of the need for design changes and a documented method to control these changes. Design and specification changes are subject to design control measures commensurate with those applied during the original design as amended by applicable design or licensing basis changes.

An independent review and approval of design changes is performed by the organization that conducted the original design reviews, unless such review is performed by NNECO or another qualified organization delegated by NNECO to perform this function.

Proposed design change modifications are submitted to the appropriate ***Nuclear Technical Services*** management for processing and review. This review includes the ***appropriate on-site review committee(s) as required by applicable procedures. If the change involves a quality structure, system or component, the change shall be reviewed by qualified engineering personnel for technical adequacy.*** Reviews of the safety evaluations associated with proposed design changes are performed by the Nuclear Safety Assessment Board (NSAB). The sequence of the NSAB review depends upon the determination of whether an unreviewed safety question is involved (i.e., in accordance with ANSI N18.7, if a proposed change in the facility involves an unreviewed safety question then the NSAB review is conducted prior to submittal of the proposed change to the NRC for review and the issuance of a license amendment for its implementation).

The combination of these independent reviews by the ***on-site review committee(s)*** and NSAB is performed to assure that:

a. the adequacy of the proposed change is substantiated;

b. unreviewed safety questions are properly identified and handled per 10 CFR 50.59;

c. nuclear safety requirements have been addressed.

Errors and deficiencies in design, including the design process, that could adversely affect quality structures, systems, and components are documented and corrective action is taken in accordance with QAP 15.0, "Nonconforming Materials, Parts, Components, or Services" and/or QAP 16.0, "Corrective Action".

Notification of design changes are transmitted to responsible plant personnel prior to implementation and as part of the design change package close out. Procedures describe this notification which assures that personnel are made aware of design change modifications which may affect the performance of their duties.

3.2.3 DESIGN INTERFACE CONTROL

Procedures and instructions identify design interface controls and the resolution of design interface questions during modifications to the station nuclear power plants.

3.2.4 INDEPENDENT DESIGN VERIFICATION

Original designs and design modifications are reviewed for adequacy and the sign-off performed by a person other than the originator of the design. The originator's supervisor may perform this independent review only if the supervisor: (1) did not specify a singular design approach, (2) did not establish the design inputs or rule out certain design considerations, (3) 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. Design verification is documented in accordance with procedures or instructions. Simplified calculations or computer programs may be utilized as alternate means of design verification. When design verification is performed by testing, the tests are performed using procedures, which specify the authority and responsibility of design verification personnel. Responsibility for design adequacy and evaluation is retained by ***Nuclear Technical Services***.

Design verification (if other than by qualification testing) is normally completed prior to release for procurement, fabrication, and construction, or release to another organization for use in other design activities. For those cases where design verification cannot be completed prior to release for procurement, fabrication, and construction, procedures assure

that design verification is completed prior to the point when the installation is declared operational.

Procedures describe the requirements which assure the following when testing is considered as an alternate method of design verification:

a. Specifications or procedures provide criteria that specify when verification should be by test.

b. Prototype, component or feature testing is performed as early as possible prior to installation of plant equipment, or prior to the point when the installation is declared operational.

c. Verification by test performed under conditions that simulate the most adverse conditions as determined by analysis.

Particular emphasis is placed on assuring that designs are in conformance with applicable codes, and on selecting the proper design verification or checking method. Procedures and instructions provide the requirements and necessary controls for design verification. These controls include a review to assure that design characteristics can be controlled, verification that there is adequate accessibility for inspection or test, and that inspection and test acceptance criteria are incorporated. Documentation of reviews is provided.

Procedures include requirements which identify the responsibility of design verifiers, the areas and features to be verified, and the extent of the documentation.

Procedures assure that procedural control is established for design documents that reflect the commitments of the nuclear unit FSAR. These procedural controls vary for design documents which receive formal design verification by several disciplines or organizations, and those which can be reviewed by a single individual. The specific design documents and specialized reviews are determined and used as required by the design changes and modifications.

Procedures are established to assure that verified computer programs are certified for a specific use.

NNECO is responsible for assuring that the design documents generated by vendors for the Station nuclear power plants are technically correct, approved, and maintained.

4.0 PROCUREMENT DOCUMENT CONTROL

4.1 GENERAL REQUIREMENTS

This NUQAP provides measures to control the procurement of materials, equipment, parts and services for quality structures, systems, and components for the Millstone Station nuclear power plants to assure compliance with applicable regulatory requirements, procedures, quality assurance standards, and regulations affecting procurement documents. Changes to procurement documents are subject to the same degree of control as utilized in the preparation of the original documents.

4.2 IMPLEMENTATION

4.2.1 PROGRAM

A responsible engineer is selected for each modification to a Station nuclear power plant. The responsible engineer coordinates the preparation, review and approval of procurement documents for quality materials, equipment, parts and services, and assures the technical adequacy and inclusion of quality assurance requirements.

Requests for materials, equipment, parts and services are reviewed for technical adequacy and verification of the quality designation. The appropriate responsible engineer/nuclear unit management reviews and approves such requests in accordance with applicable procedures. Nuclear Materials and Document Management personnel then perform a procurement engineering evaluation to assure the inclusion and adequacy of quality assurance requirements prior to the issuance of the purchase order. Materials, equipment, and parts for which technical and quality assurance requirements have been previously established within the Material Information Management System are purchased without additional procurement engineering evaluations.

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible to implement measures for control of associated procurement documents to assure applicable requirements including quality assurance requirements are specified.

Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for the control of procurement documents.

Changes to procurement documents, whether initiated by NNECO or its representative, are subjected to the same degree of control as that utilized in the preparation of the original document. The procurement of spare or replacement parts for quality structures, systems, or components is subject to the controls of this NUQAP and applicable procedure requirements. The spare or replacement parts are subject to controls equivalent to original or subsequent codes and standards. The use of subsequent codes and standards are controlled in accordance with QAP 3.0, "Design Control".

Procurement engineering evaluations of requests for quality materials, equipment, parts, and services requests are performed by Nuclear Materials and Document Management personnel to assure that:

a. Adequate technical requirements are specified;

b. The quality assurance requirements are correctly stated, auditable and controllable;

c. There are adequate acceptance and rejection criteria.

4.2.2 PROCUREMENT DOCUMENT PROVISIONS

Procurement documents are prepared, reviewed and approved in accordance with applicable procedures of the issuing organization or department and are available for verification. These procedures require that procurement documents consist of the following, as necessary:

a. The scope of work to be performed;

b. Technical requirements (specified or referenced) including the applicable components and materials Identification requirements, drawings, specifications, procedures, instructions, codes and regulations, and the identification of applicable test, inspection and acceptance requirements, or special process instructions;

c. Quality assurance program requirements to be imposed on vendors which include the applicable requirements of 10 CFR 50, Appendix B, and the NRC regulatory position contained in the regulatory guides and their endorsed ANSI/IEEE standards listed in Appendix C.

d. Right of access which provides, as appropriate, for access to vendor facilities and records for inspection or audit by NNECO or its designated representative; and provides access for events such as those requiring notification of hold points;

e. The documentation required to be prepared, maintained, and/or submitted to NNECO or its representative for review, approval or historical record. The time of submittal of this documentation and the retention and disposition of quality assurance records which are not submitted to NNECO is prescribed, as applicable, for nuclear grade procurements.

4.2.3 SELECTION OF PROCUREMENT SOURCES

The vendor is specified during the procurement process based upon the vendor approval status, qualifications and capabilities to provide the product or service, performance history, and NNECO's ability to verify the quality of the product or service being purchased. NNECO maintains an approved vendors list based upon the technical and quality capability as determined by a direct evaluation of the vendor's facilities and personnel and the implementation of the vendor's quality assurance program.

Procurement documents may be issued to vendors with unapproved quality assurance programs. These procurement documents to unapproved vendor contain detailed supplementary quality assurance requirements and/or witness/hold points to meet NNECO requirements.

Procurement documents are reviewed by Nuclear Materials and Document Management to assure appropriate quality assurance requirements are specified. The requirements include, as necessary, audits, surveillances, or inspections at the vendor's facilities with scheduled witness/hold points during the fabrication process and/or prior to shipment of the procured items. Acceptance inspections and tests determined by NNECO shall be performed after receipt at Millstone Power Station but prior to installation in the plant or prior to the point when the installation is declared operational.

5.0 PROCEDURES, INSTRUCTIONS AND DRAWINGS

5.1 GENERAL REQUIREMENTS

This NUQAP provides measures for the preparation, review, approval, control and distribution of procedures, instructions and drawings for activities affecting quality structures, systems, and components of the Millstone Station nuclear power plants. The documents include appropriate quantitative and qualitative acceptance criteria which specify the activity to be performed, the methods of fabrication, construction, and testing to be employed; the materials, equipment or parts to be used; a sequence of operation, and the required documentation.

5.2 IMPLEMENTATION

Quality procedures provide direction for personnel performing quality activities. The Nuclear Oversight Department reviews and concurs with other department quality procedures which implement this NUQAP as described in Section 5.2.1 below. Comments concerning compliance with this NUQAP and regulatory requirements are resolved prior to issuance of the procedure. Any vendors utilized to perform quality activities for the Station nuclear power plants may be delegated responsibility for preparing, maintaining, issuing and verifying the implementation of appropriate program documents which are selectively reviewed/approved by the appropriate Director or Responsible Engineer. Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for compliance with procedures and instructions. Vendor quality assurance programs are required to clearly delineate the actions to be accomplished in the preparation, review and control of procedures, instructions and drawings and the methods for complying with 10 CFR 50, Appendix B.

5.2.1 PROCEDURES AND INSTRUCTIONS

Procedures and instructions for activities affecting quality are prepared, reviewed, and approved in accordance with written procedures and instructions.

The cognizant Director or responsible engineer assures that any vendors utilized to perform quality activities for the Station nuclear power plants implement quality assurance programs which contain written instructions for preparation, review and approval of procedures and instructions affecting quality. In addition, vendor quality procedures and quality control inspection procedures which are to be used for onsite activities are reviewed for concurrence by Nuclear Oversight ***to assure compliance with the Northeast Utilities Quality Assurance Program (this NUQAP).***

NNECO is responsible for the preparation, review and approval of station and plant quality procedures. The procedures include test procedures and overall site administrative procedures which implement the requirements of this NUQAP. Each NUSCO/NNECO organization is also responsible for the preparation, review and approval of procedures covering quality activities in accordance with individual license requirements. The Nuclear Oversight Department reviews and concurs with quality procedures and special process procedures. The criteria for documents requiring Nuclear Oversight review and concurrence and their identification are defined in quality procedures to assure:

a. Administrative procedures and manuals comply with this NUQAP and applicable Appendix C regulatory guides and endorsed ANSI/IEEE standards.

b. Work procedures and work documents used to perform quality activities have the necessary quality assurance controls as described in QAP 10.0, "Inspection".

5.2.2 DRAWINGS

The design control and verification measures described in QAP 3.0, "Design Control", are applicable for the review and approval of drawings. Review and approval of new drawings or modifications to existing drawings are described in NUSCO/NNECO procedures. The originating organization may delegate to other organizations or departments the work of design and review activities, or any part thereof, but retains responsibility for this work.

The measures taken to assure the preparation of as-built drawings and related documentation in a timely manner to accurately reflect the actual plant are described in NUSCO/NNECO procedures. Drawings critical to operation are updated prior to system turnover to operation and are available to the operating personnel.

5.2.3 ACCEPTANCE CRITERIA

Cognizant Department Heads review and approve departmental procedures, instructions and drawings to assure the inclusion of adequate quantitative and qualitative acceptance criteria, as appropriate, for determining satisfactory work performance and quality compliance for applicable quality activities.

6.0 DOCUMENT CONTROL

6.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure controlled distribution of documents pertinent to quality activities performed for the Millstone Station nuclear power plants in accordance with quality procedures.

Documents such as procedures, instructions, drawings, specifications and reports are prepared, reviewed for appropriate qualitative and quantitative acceptance criteria, and approved by authorized personnel in the affected organization. Approved controlled documents are distributed to affected locations in accordance with controlled distribution lists. Changes to controlled documents are reviewed and approved by the same organization which performed the original review and approval, unless otherwise specified in the applicable procedures. Measures are provided for controlling documents to preclude the possibility of use of outdated documents.

6.2 IMPLEMENTATION

6.2.1 RESPONSIBILITY

NUSCO/NNECO procedures and instructions delineate the measures for controlling documents including direction for the review for adequacy, approval by authorized personnel, distribution of controlled documents and verification that changes are promptly incorporated and implemented. These control measures apply to documents affecting quality structures, systems and components during the performance of quality activities for the Station nuclear power plants and include documents such as:

a. Design Specifications;

b. Design, Manufacturing, Construction and Installation Drawings;

c. As-Built Documents;

d. Quality Assurance Program Manuals, Procedures and Instructions;

e. Manufacturing, Inspection and Testing Instructions;

f. Test Procedures;

g. Calculations;

h. Engineering Record Correspondence;

i. Design Basis Documentation Summaries (DBDS)

j. Final Safety Analysis Reports;

k. Procurement Documents;

l. Design Change Records;

m. Topical Report;

n. Nonconformance Reports;

o. Computer Codes.

NUSCO/NNECO procedures describe the measures taken by the Nuclear Oversight Department or individuals other than the person who generated the document but qualified in quality assurance for the control of documents to assure review and concurrence, as necessary, for such documents listed above with regards to quality assurance aspects.

The requirements for control of procurement documents are contained in QAP 4.0, "Procurement Document Control". It is the responsibility of each organization issuing controlled documents to employ document control procedures. The issuing organization is additionally responsible for distribution of the documents to appropriate locations. There shall be provisions to assure that approved changes are included in instructions, procedures, drawings and other documents prior to implementation of the changes.

Any vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing measures for review, approval, control and distribution of controlled documents to assure they are effectively complying with the requirements for document control. Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for document control.

6.2.2 DISTRIBUTION OF CONTROLLED DOCUMENTS

NUSCO/NNECO procedures specify in what manner controlled documents, and revisions thereof, are distributed to appropriate locations prior to commencing the work.

6.2.3 DRAWING CONTROL

Station Nuclear Document Services is responsible to implement a program, through applicable procedures, for the retention and retrieval of

drawings and records submitted by cognizant NUSCO/NNECO personnel. Station Nuclear Document Services maintains a drawing status file which includes drawings newly issued or revised with the latest revision and current status.

Vendors utilized to perform quality activities for the Station nuclear power plants may be delegated the function of drawing control and must furnish periodic status reports listing the revisions of applicable drawings which they issue.

Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for control of drawings.

6.2.4 PROCEDURE AND INSTRUCTION CONTROL

Nuclear Oversight performs audits, surveillances, and inspections, as appropriate, to verify that NUSCO/NNECO Departments are effectively complying with this NUQAP and procedural requirements, for control of procedures and instructions. Audits, surveillances, and inspections are performed, as appropriate, to verify vendors utilized to perform quality activities are effectively complying with their quality assurance program requirements for control of procedures and instructions.

The originating department is responsible for establishing adequate control over quality procedures and instructions issued by them. The responsible organization also issues status reports or revised indices listing the latest revision of applicable controlled documents issued by them.

7.0 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

7.1 GENERAL REQUIREMENTS

This NUQAP provides measures for the control of purchased material, equipment, parts and services utilized in quality activities for the Millstone Station nuclear power plants to assure conformance to procurement documents. These measures include provisions for source evaluation and selection, submission of objective evidence by the vendor or subvendors, inspection at the vendor facility, and acceptance inspection and testing of the product upon delivery. Control of quality by vendors and their subvendors is assessed for effectiveness at intervals consistent with the importance, complexity and quantity of the product or service.

7.2 IMPLEMENTATION

The evaluation and selection of vendors is performed in accordance with procedures, which specify that procurement source evaluation and selection measures are performed to determine vendor capability and delineate responsibilities of qualified personnel involved in the evaluation and selection process.

7.2.1 VENDOR QUALIFICATIONS

Nuclear Materials and Document Management utilizes one or more of the following methods in evaluating the qualifications of a potential vendor:

a. Audits performed by Nuclear Oversight or Nuclear Materials and Document Management and/or coordinated review of potential vendor utilizing one or more departments (i.e., engineering, site services, operations, procurement);

b. Other utility vendor audits and evaluations;

c. Nuclear Procurement Issues Committee (NUPIC) audits;

d. ASME N, NA, NPT, NV, or MM/ MS Certificate of Authorization;

e. ***ASME Certificate of Accreditation for Authorized Inspection Agencies;***

f. Commercial grade surveys and/or coordinated review of a potential vendor utilizing one or more departments, (i.e., engineering, site services, operations, procurement);

g. Source inspection/surveillance.

Evaluations assure that vendors providing quality material, equipment, parts and services employ a quality assurance program that conforms to applicable portions of this NUQAP.

Nuclear Materials and Document Management is responsible for assuring that documented evidence of the evaluation and acceptance of the vendor's quality assurance program is maintained. The determination of vendor approval is based on such factors as prior performance, quality performance data, audits, commercial grade surveys, surveillances and evaluations of the vendor's quality assurance program.

Vendor Certificates of Conformance are periodically evaluated by audits, commercial grade surveys, surveillances, independent inspections and tests, to assure they are valid. This verification of Certificates of Conformance is documented.

7.2.2 SOURCE INSPECTION

Nuclear Materials and Document Management is responsible for the performance of source inspections at vendor facilities to assure that the requirements of a purchase order/contract have been met.

Source inspections are performed in accordance with procedures which provide for the method of inspection, the extent of documentation required and those responsible for implementing those instructions.

Inspection of items occurs either when verifications of procurement requirements cannot be determined upon receipt or the vendor quality assurance program has not been accepted by Nuclear Materials and Document Management.

7.2.3 RECEIPT INSPECTION

Receipt inspection for procured items is performed by Nuclear Materials and Document Management in accordance with quality procedures which delineate requirements and responsibilities necessary to perform inspection functions. The exception to this is Reactor Engineering performing receipt inspection for new fuel assemblies in accordance with quality procedures. Contractual obligation fulfillment and specified requirements are verified during receipt inspections.

Receipt inspection of vendor-furnished material, equipment, and parts is performed to assure that these items and acceptance records are examined in accordance with predetermined inspection instructions prior to acceptance, installation and operation. Receipt inspections include, as appropriate:

a. Measures for verifying that the shipment is complete, properly identified, undamaged and corresponds with the required documentation;

b. Measures for inspection of the item's critical characteristics and review of supporting documentation (e.g., mill test reports, NDE reports) as required by the procurement documents;

c. Measures for inspection and acceptance of items in accordance with predetermined methods;

d. Measures for identifying and controlling acceptable items including identification of inspection status prior to release from the receiving inspection area;

e. Measures for identifying, segregating and handling nonconforming items;

f. Measures to ascertain that inspection records or Certificates of Conformance are acceptable prior to release for installation;

g. In cases involving purchased services, the responsible engineer or Department Head shall designate the means by which services may be accepted, and is given the authority to accept services in accordance with methods defined in NUSCO/NNECO procedures.

7.2.4 VENDOR FURNISHED RECORDS

Records required to be furnished by the vendor are specified in the procurement documents. Certifications or documentation provided by the vendor which attests to conformance, identifies that all the specific procurement requirements have been met (either by reference to the purchase order or by delineation).

The vendor must furnish the following records as a minimum for nuclear grade purchases:

a. Documentation that identifies the purchased material, equipment, or parts and the specific procurement requirements (e.g., codes, standards and specifications) which have been met by the items;

b. Documentation that identifies any procurement requirements which have not been met, together with a description of those Nonconformances dispositioned "accept as is" or "repair."

The responsible Nuclear Materials and Document Management and/or engineering and other appropriate department personnel shall review for acceptability those documents which pertain to the requirements in the procurement document, in accordance with this NUQAP and applicable procedures.

The department that is contracting onsite quality assurance services shall be responsible for the review and acceptability of vendor personnel/equipment certifications prior to the start of work. The Nuclear Oversight department shall provide oversight of these activities via surveillance, or inspection, as appropriate, to verify compliance with this requirement.

7.2.5 COMMERCIAL DEDICATION

NNECO procedures address the measures taken to assure that for commercial grade items, where specific quality assurance controls for nuclear applications cannot be imposed in a practicable manner, that special dedication requirements are established and implemented.

These measures follow the guidance in Regulatory Guide 1.144, paragraph C. 3. b (1) and Regulatory Guide 1.123 and applicable paragraphs of Section 10 of ANSI N45.2.13.

These measures include appropriate requirements for special categorization and identification within the procurement document, receiving inspection, and additional controls during the installation and testing process to be performed by Nuclear Materials and Document Management, other NUSCO/NNECO Departments, or other appropriate groups.

8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS

8.1 GENERAL REQUIREMENTS

This NUQAP provides measures for the identification and control of materials, parts and components, including partially fabricated assemblies utilized in quality activities for the Millstone Power Station. To assure that each item can be traced to associated documentation, the identification of the item is maintained by heat number, lot number, part number, serial number, or other appropriate methods, and is physically marked on the item and/or on records traceable to the item. Documentation associated with materials, parts, and components delineate that these items have been designed, fabricated, manufactured, tested and/or inspected in accordance with the specified requirements. The object of these controls is to prevent the use of incorrect or defective materials, parts and components.

These measures also require NNECO assure that the identification of inspections, tests, and operation status of structures, systems, and components is known to affected organizations.

8.2 IMPLEMENTATION

NNECO procedures establish the responsibilities and requirements for the identification and control of materials, parts and components. The procedures assure that identification and control are maintained throughout fabrication, receipt, handling, storage and installation of items. Provisions include:

a. Requirements for traceability to appropriate documentation such as: purchase orders, contracts, manufacturing documents, drawings, specifications, certifications, inspection and test records, and nonconformance reports;

b. Controls to assure that the correct identification of an item is verified and documented prior to release for fabrication, assembly, shipping or installation;

c. Requirements which assure that the method or location of markings do not affect the function or quality of an item;

d. Establishment of identification requirements in purchase orders, contracts, specifications, drawings, procedures or instructions.

During the performance of quality activities for the Station nuclear power plants, NNECO may delegate any portion of the implementation of the identification and control program to a vendor. If delegated, contracts require that the vendor establish an identification and control program which meets this NUQAP requirements. Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for identification and control of materials, parts and components.

Receipt inspections are performed to verify that materials, parts and components are properly identified in accordance with procurement requirements. Nuclear Materials and Document Management is responsible for assigning and applying necessary identification to the items in accordance with applicable procedures to assure proper identification and traceabiltiy.

In the event that materials, parts or components are nonconforming or the identification becomes lost or illegible, the items are considered nonconforming and are identified and controlled in accordance with QAP 15.0, "Nonconforming Materials, Parts, Components, or Services".

9.0 CONTROL OF SPECIAL PROCESSES

9.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure the control of special processes associated with quality structures, systems, and components of the Millstone Station nuclear power plants by the use of qualified procedures, equipment and personnel.

Special processes are performed under controlled conditions in accordance with special requirements and may include, but are not limited to: welding, cleaning, heat treating, and nondestructive examination and/or testing.

9.2 IMPLEMENTATION

During quality activities performed for the Station's nuclear power plants, the responsible engineer assures that special process data and documentation is reviewed, and that vendor special process procedures utilized for the Station nuclear power plants are qualified and approved, and that personnel and equipment utilizing special processes are properly qualified prior to start of work. Audits, surveillances, and inspections are performed, as appropriate to verify that these vendors are effectively complying with their quality assurance program requirements for control of special processes.

NUSCO/NNECO special process procedures utilized during quality activities for the Station nuclear power plants are prepared, reviewed and approved in accordance with procedures as specified in QAP 5.0, "Procedures, Instructions, and Drawings".

9.2.1 PROCEDURE QUALIFICATION AND CONTROL

NUSCO/NNECO procedures specify that written process control documents are utilized and qualified, as required, in accordance with the applicable specification, codes or standards.

9.2.2 PERSONNEL QUALIFICATION AND CERTIFICATION

Codes, standards and NUSCO/NNECO procedures specify personnel qualification/certification requirements. Personnel responsible for the performance and verification of special processes are trained, tested, and certified as required by applicable specifications, codes and standards. Requirements for the period of certification, examinations, and certification renewal of personnel are also specified. Vendors qualify personnel and maintain records of qualified personnel in accordance with applicable codes, standards, specifications, and vendor purchase order/contract requirements.

The department that is contracting services is responsible for the review of records of qualified personnel, equipment and procedures associated with special processes. Nuclear Materials and Document Management or Nuclear

Oversight shall provide an oversight function via audits, surveillances, or inspections, as appropriate.

The Nuclear Oversight Department is responsible for assuring the training, testing, and certification of all the Millstone Power Station NU NDE personnel is in accordance with the requirements of Regulatory Guide 1.58 (Rev. 1, 9/80) and ASNT Recommended Practice No. SNT-TC-1A.

9.2.3 SPECIAL PROCESS RECORDS

Records provide objective evidence that special processes were performed in accordance with applicable procedures, by qualified personnel, and that when required by procedures, specifications and codes, such performance was verified. Results of nondestructive examinations are recorded in accordance with applicable specifications, codes and standards. These records are retained by the vendor or supplied to NNECO as required by contract or purchase order. If records are to be retained by the vendor, the contract or purchase order specifies the retention period and instruction for final disposition of records.

Special process documentation such as special process procedures, qualifying data, and personnel and equipment qualification records associated with the performance of special processes at Station nuclear power plants, are kept current and maintained in appropriate NNECO files, with final disposition to the Station Nuclear Document Services Facility.

10.0 INSPECTION

10.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure that inspections of Millstone Station nuclear power plants quality structures, systems, and components to verify conformance with documented procedures, instructions and drawings are executed in accordance with procedures by qualified personnel independent from the individual or group performing the activity being inspected. If inspection is impossible or disadvantageous, indirect controls by monitoring processing methods, equipment and personnel are provided. Inspection notification and hold points are identified, as required, in the applicable documents.

10.2 IMPLEMENTATION

10.2.1 INSPECTION RESPONSIBILITIES

During the performance of quality activities for the Station nuclear power plants, procedures shall define the need for inspection (e.g., receipt inspection, installation, and product acceptance) to assure quality requirements are met.

Nuclear Oversight shall perform, as appropriate, audits and surveillances as defined in Nuclear Oversight procedures to verify that procedural requirements are met.

The Nuclear Oversight Department shall perform inspections of modification and maintenance activities for quality structures, systems, and components. The criteria used to determine when Nuclear Oversight inspection shall be required for these activities and for the preparation of inspection plans shall be identified in Nuclear Oversight procedures. The Nuclear Oversight inspection function includes:

a. Identification of inspection personnel;

b. Review of work procedures and work documents for adequacy of inspection and mandatory hold points;

c. Preparation and approval of inspection plans ensuring that the necessary inspection requirements, methods, and acceptance criteria have been identified;

d. Documentation of inspection results.

Audits, surveillances, and inspections, are performed as appropriate, to verify that any vendor utilized to perform quality activities for the Station nuclear power plants are effectively complying with their quality assurance program requirements for inspection and for the performance or witnessing of inspections at hold or notification points identified in procurement documents.

Nuclear Oversight performs audits, surveillances, and inspections, as appropriate, of onsite vendor activities in this area. All audit, surveillance, and inspection activities are performed under requirements specified in quality procedures.

10.2.2 INSPECTION PLANS

Documented inspection plans may be either a separate document or an integral part of work instruction documents. The plans are based on design specifications, procurement documents, drawings, other specifications, or previous experience, as appropriate.

During the performance of quality activities, procedures provide criteria for the determination of accuracy requirements of inspection equipment and when inspections are required. These procedures describe requirements for the preparation of inspection plans by the Nuclear Oversight Department. Audits and surveillances are performed by the Nuclear Oversight Department, as appropriate, to verify the implementation of the inspection plans.

The inspection criteria, including the use of inspection equipment and their accuracy requirements, are specified in the work procedures, work documents, or inspection plans.

10.2.3 INSPECTION PERSONNEL AND INSPECTION DOCUMENT ACCESS

Inspections are performed by individuals other than those who performed or directly supervised the activity being inspected. Inspection personnel are qualified and/or certified in accordance with appropriate codes, standards, and/or NU training programs;

Inspections are performed by Nuclear Oversight Department personnel, qualified contracted personnel, and NUSCO/NNECO personnel who are independent from undue pressure such as cost, or schedule considerations. Nuclear Oversight shall assure the certification of its contracted inspection personnel is acceptable prior to the performance of inspection activities. When other departments are contracting for onsite quality assurance inspection services, these departments shall be responsible for the review and acceptability of personnel/equipment certification prior to the start of inspection activities. Nuclear Oversight shall perform audits and surveillances, as appropriate, to verify other department compliance with these requirements.

When vendors are contracted to perform onsite inspection services, their quality control inspection plans/procedures are reviewed and concurred with by Nuclear Oversight in accordance with QAP 5.0, "Procedures, Instructions, and Drawings".

Access to drawings, procedures, specifications or other documented criteria necessary for the performance of inspections is provided prior to performing the inspection activity.

10.2.4 INSPECTION PROCEDURES

Required inspection or surveillance activities are performed and documented according to procedures and/or checklists. Inspection procedures, plans or checklists contain the following:

a. Identification of characteristics to be inspected;

b. Identification of the individual or groups responsible for performing the inspections;

c. Requirements for the necessary measuring and test equipment and the required accuracy of this equipment;

d. Acceptance criteria;

e. A description of the method of inspection when other than direct visual examination using the unaided eye;

f. A record of the results of the inspection;

g. Record of inspector or data recorder.

Procedures specify surveillance of processing methods or testing and operation of equipment when inspection is impossible, inaccessible or not applicable.

Modification, repair, replacement, or rework items are inspected in accordance with original inspection requirements or approved alternatives.

10.2.5 MANDATORY HOLD AND NOTIFICATION POINTS

Mandatory hold points are utilized when an inspection or operation must be performed or witnessed and signed off by the responsible personnel before work can proceed. Mandatory hold points are identified to assure attributes critical to achieving quality requirements at work completion have been verified. Mandatory notification points are used to identify the operations or completed processes that NNECO or its representatives may elect to witness and/or inspect during the fabrication, construction and installation process. Mandatory hold points and notification points, as required, are identified in procurement documents and onsite work procedures/work documents. Procurement documents and onsite work procedures/work documents are subject to the review and concurrence for adequacy of inspection, notification and/or mandatory hold controls by Nuclear Materials and Document Management and Nuclear Oversight, respectively.

10.2.6 INSPECTION RESULTS EVALUATION

Inspection results are evaluated for acceptability in accordance with applicable procedures which identify the responsible organization.

The evaluations are performed by the personnel who are qualified in accordance with the appropriate regulatory guide and endorsed ANSI standard listed in Appendix C.

Nuclear Oversight performs audits and surveillances, as appropriate, to verify that inspections are performed in accordance with the requirements of applicable procedures.

11.0 TEST CONTROL

11.1 GENERAL REQUIREMENTS

This NUQAP requires a documented test control program for Millstone Station nuclear power plants quality structures, systems, and components be established to assure that they will perform satisfactorily in service and that test results are documented in accordance with applicable regulatory and technical requirements.

The test control program identifies the quality structures, systems, and components to be tested, method of conducting tests, evaluation of tests and documentation of tests by qualified personnel to assure requirements have been satisfied.

The test control program is systematic and includes proof tests prior to installation, construction tests, operational tests, surveillance tests, and tests following repairs, reworks, replacements, preventive maintenance or modifications as required to verify performance will be satisfactory during operation.

11.2 IMPLEMENTATION

11.2.1 TEST PROGRAM

Test requirements to determine or to verify the capability of an item to meet specified requirements in accordance with design documents, Safety Analysis Reports (SAR), Technical Specifications, procedures or procurement documents, as appropriate, are accomplished by subjecting the item to a set of physical, chemical, environmental or operating conditions. Tests following repair, rework, replacement, preventive maintenance or modification is performed, as required, in accordance with the original design requirements of the item or acceptable alternatives, as applicable. A Test may be repeated when original test results are invalidated.

NUSCO/NNECO procedures delineate the methods and responsibilities for controlling, accomplishing and documenting testing of the Station nuclear power plants quality structures, systems, and components.

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing measures for the control of tests to assure that materials, equipment and parts used in quality structures, systems, and components will perform satisfactorily. Audits, surveillances, and inspections, are performed as appropriate, to verify the performance of selected proof tests when hold points have been identified in purchase order/contracts and to verify these vendors are complying with their quality assurance program requirements for test control. Nuclear Oversight performs audits, surveillances, and inspections, as appropriate, of onsite vendor activities in this area. Nuclear Materials and Document Management and Nuclear Oversight are responsible for assuring documentation associated with these verification activities are maintained in the appropriate files until forwarded to the Station Nuclear Records Facility in accordance with applicable procedures.

Proof tests, product acceptance tests, post maintenance or modification tests, and periodic surveillance tests are conducted by qualified personnel in accordance with applicable procedures. Personnel performing tests assure that calibrated equipment and instrumentation utilized are within the calibration interval specified. Documentation including test procedures and approved data sheets are maintained in appropriate files until forwarded to the Station Nuclear Records Facility in accordance with applicable procedures.

11.2.2 TEST PROCEDURE PREPARATION AND TEST PERFORMANCE

Testing is accomplished in accordance with approved test procedures which incorporate or reference the requirements and acceptance criteria in the applicable design and procurement documents. The test procedure or test program documents include the following as a minimum:

a. Instructions for the testing method used;

b. Required test equipment and instrumentation;

c. Test requirements, such as acceptance criteria;

d. Hold, notification, inspection points, if required, and data collection points;

e. Test prerequisites such as: calibrated instrumentation; trained, qualified, and licensed or certified personnel; preparation, condition and completeness of item to be tested; suitable and controlled environmental conditions;

f. Methods for documenting or recording test data and results;

g. Provisions for data collection and storage.

11.2.3 TEST EQUIPMENT

NUSCO/NNECO procedures provide the criteria for determining when a test is required and the accuracy requirements of test equipment. The following steps are taken for the control of test equipment:

a. To assure accuracy, test equipment is checked and calibrated in accordance with NUSCO/NNECO procedures;

b. Plant instrumentation used in testing is calibrated. It is maintained in calibration at regular intervals in accordance with established surveillance and/or preventative maintenance procedures;

c. Where special instrumentation is required for testing, the requirements are stated in the procedures. Instrument characteristics, including accuracy requirements, are equivalent to or better than those specified by the vendor.

11.2.4 EVALUATION OF TEST RESULTS

The documented test results are evaluated against the predetermined acceptance criteria by an individual or group having appropriate qualifications. The acceptance status of the test is documented. Deficiencies noted during the evaluation are documented and dispositioned in accordance with procedures.

The evaluation of test results may also be delegated to vendors. When delegated, the vendor is required to assure the use of qualified personnel, evaluate the data against predetermined criteria and document the results of the evaluation and acceptance status of the test. Audits, surveillances, and inspections, are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for test control. Nuclear Oversight performs audits, surveillances, and inspections, as appropriate, of onsite vendor activities in this area.

12.0 CONTROL OF MEASURING AND TESTING EQUIPMENT

12.1 GENERAL REQUIREMENTS

This NUQAP provides measures for the control of measuring and testing equipment (M&TE) used as the basis for acceptance during inspection, testing, and measurement of materials, equipment, and parts affecting quality structures, systems, and components. Periodic calibration and adjustment of M&TE is performed and controlled to assure accuracy is maintained within limits necessary to verify that design and operating condition requirements have been met. Documentation is retained such that all items of M&TE are traceable to their calibration records.

12.2 IMPLEMENTATION

12.2.1 CALIBRATION PROGRAM

Procedures delineate the methods and responsibilities for the control, maintenance and calibration of M&TE including portable and temporarily installed instruments, tools, gages, fixtures, reference and transfer standards, and nondestructive test equipment.

Documentation associated with the calibration of all M&TE is maintained in appropriate files and retained as quality records in accordance with the NU Nuclear Records Program. When the information for the control, use, and calibration of M&TE is in electronic form, this information is controlled and protected in accordance with applicable procedures.

The calibration program is implemented in accordance with the requirements defined in NUSCO/NNECO procedures which describe the measures utilized to maintain the calibration of the M&TE. Functional groups are responsible for implementing these procedures which comply with the requirements contained in specifications and drawings. Procedures related to the M&TE calibration program are reviewed and approved by the ***appropriate on-site review committee***or the Station Qualified Reviewer Program, as defined in applicable procedures. Nuclear Materials and Document Management or the appropriate M&TE custodian, as delineated by the purchase order, is responsible for verifying that receipt of calibrated equipment is in conformance with the requirements of procurement documents. Nuclear Materials and Document Management and Nuclear Oversight are responsible for control of calibrated M&TE used during their inspections.

Department Heads/Job Supervisors are responsible to assure that M&TE is calibrated, issued, and controlled in accordance with the requirements of applicable procedures.
The Nuclear Oversight Department performs audits, surveillances, and inspections, as appropriate, to verify implementation of the calibration program.
Vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing measures for the control of M&TE to assure the M&TE are properly calibrated, adjusted and maintained at specified intervals in order to maintain accuracy within required limits. Audits, surveillances, and inspections, are

performed, as appropriate, to verify these vendors are effectively complying with their quality assurance program requirements for control of M&TE.

12.2.2 CALIBRATION STANDARDS

Measuring and test equipment is calibrated at specified intervals based on the required accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurement. Measuring and test equipment shall be permanently marked or tagged with a unique Identification number and the date calibrated and next calibration date indicated on the M&TE.

Procedures describe the measures taken to assure that reference and transfer standards are traceable to nationally recognized standards and that, where national standards do not exist, provisions are established to document the basis for calibration.

Calibration of this equipment should be against standards that have an accuracy of at least four times the required accuracy of the equipment being calibrated. When this is not possible, the standards shall have an accuracy that assures the equipment being calibrated shall be within required tolerance and the basis of acceptance is documented and authorized by the ***appropriate on-site review committee.*** In addition, the calibrating standards shall have greater accuracy than secondary standards being calibrated. Calibrating standards with the same accuracy may be used if they can be shown to be adequate for the requirements and the basis of acceptance is documented.

12.2.3 "OUT OF TOLERANCE" CONTROL

M&TE and reference standards when found out of tolerance are so identified and removed from service. A timely review is conducted to determine the validity of previous inspection or test results gained through use of the instrument, and of the acceptability of items previously measured or tested. Where it is determined that use of out of tolerance measuring and test equipment may have resulted in a condition adverse to quality, the condition is promptly identified and corrective action is implemented in accordance with QAP 15, "Nonconforming Materials, Parts, Components or Services" and QAP 16, "Corrective Action" respectively as appropriate.

13.0 HANDLING, STORAGE AND SHIPPING

13.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure proper handling, storage, shipping, cleaning and preservation of materials, equipment and parts used for Millstone Station nuclear power plant quality structures, systems, and components in order to preclude damage, loss or deterioration.

13.2 IMPLEMENTATION

13.2.1 GENERAL

Procedures, instructions and procurement documents define the requirements and responsibilities for the handling, storage, shipping, cleaning and preservation of materials, equipment, and parts required for implementation of established design and specification requirements.

Handling, storage, shipping, cleaning and preservation of materials, equipment and parts is conducted in accordance with applicable procedures and procurement documents. Vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing measures for handling, storage, shipping, cleaning and preservation of materials, equipment and parts to preclude damage, loss or deterioration. Audits, surveillances, and inspections, are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for handling, storage, shipping, cleaning and preservation of materials, equipment and parts.

13.2.2 ESTABLISHMENT OF SPECIAL HANDLING, STORAGE, SHIPPING, CLEANING AND PRESERVATION REQUIREMENTS

Special or additional handling, storage, shipping, cleaning and preservation requirements are to be identified and implemented as specified in procurement documents and applicable procedures. These established requirements are consistent with the regulatory positions of the NRC regulatory guides and their endorsed ANSI standards listed in Appendix C, or specifications and/or vendor technical manuals, and shall be consistent with accepted industry standards.

NUSCO/NNECO procedures describe the measures taken for the storage of chemicals, reagents (including control of shelf life), lubricants, and other consumable materials.

14.0 INSPECTION, TEST AND OPERATING STATUS

14.1 GENERAL REQUIREMENTS

This NUQAP provides measures for indication, by the use of marking such as stamps, tags, labels or other suitable means, the status of tests and inspections of materials, equipment and parts to preclude the inadvertent bypassing of inspection and test requirements during quality activities performed for the Millstone Station nuclear power plants. These measures provide for the identification of items which have satisfactorily passed required inspections and tests. Measures are also established for indicating the operating status of quality structures, systems, and components to prevent inadvertent operation.

14.2 IMPLEMENTATION

14.2.1 GENERAL

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing approved measures for the identification of inspection and test status of quality material, equipment and parts to preclude the bypassing of requirements. Audits, surveillances, and inspections, are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for identification of inspection and test status. Elements of this system require that vendors have a controlled fabrication and test operation in order to preclude the inadvertent bypassing of process inspections or tests, and to provide a positive identification of component status throughout all phases of fabrication, testing, and inspection by means of tagging, routing cards, stamping, manufacturing or test reports, labeling or other appropriate methods.

When receipt inspections are performed at the Station, Nuclear Materials and Document Management assures that traceability is maintained for acceptable quality materials, equipment and parts to indicate conformance to purchase order/contract requirements with the exception of nuclear fuel assemblies, for which traceability is maintained by Reactor Engineering and Nuclear Engineering. Nonconforming materials, equipment and parts are identified in accordance with QAP 15.0, " Nonconforming Materials, Parts, Components, or Services."

During tests and inspections of the Station nuclear power plants, a status tagging system is implemented by procedure to prevent inadvertent operations of quality structures, systems, and components.

NUSCO/NNECO procedures describe the measures taken to control the altering of the sequence of required tests, inspections and other operations. The review and approval for these actions is subject to the same control as taken during the original review and approval of tests, inspections and other operations.

14.2.2 STATUS IDENTIFICATION AND CONTROL

Procedures and instructions describe control of the application and removal of markings such as stamps, tags, labels, and other suitable means to indicate the status of quality structures, systems, and components to prevent inadvertent operation, and to preclude omission of inspections, tests or other critical operations. These procedures and instructions delineate the requirements, methods and responsibilities for indicating the status of the affected items. The status of all items requiring calibration is recorded and maintained in accordance with applicable procedures.

Records associated with status identification are maintained in accordance with applicable procedures.

15.0 NONCONFORMING MATERIALS, PARTS, COMPONENTS OR SERVICES

15.1 GENERAL REQUIREMENTS

This NUQAP requires the documentation and control of nonconforming materials, parts, components, or services be performed in accordance with procedures to prevent inadvertent use or installation in Millstone Station nuclear power plant quality structures, systems, or components. These procedures include requirements for identification, documentation, segregation and disposition of nonconforming items; and notification to affected organizations.

15.2 IMPLEMENTATION

15.2.1 PROGRAM

Procedures define personnel responsibilities and establish various measures for identification, documentation, segregation, review and disposition of nonconforming item reports. The means for reporting nonconforming items are available to all NU and vendor personnel assigned at the Millstone Power Station and other personnel involved with Station quality activities.

15.2.2 DOCUMENTATION

Documentation of nonconforming items requires identification of the items, description of the nonconformance, disposition of the nonconformance, inspection requirements and signature approval of the disposition.

Tagging systems are utilized to physically identify nonconforming items prior to installation. Nuclear Materials and Document ***Management*** utilizes tags for received materials, parts and components.

15.2.3 EVALUATION AND DISPOSITION

Evaluations are performed to determine the disposition of nonconforming items and services. The evaluation determines whether an item or service is to be used as is, returned to vendor, repaired, reworked, scrapped or salvaged. An engineering evaluation is performed, if necessary, prior to the resolution of nonconforming conditions. In addition, nonconformances are evaluated for impact on quality structure, system and component operability in accordance with applicable procedures. These evaluations assure that the final condition does not adversely affect safety, operation or maintenance of the item or service. Nonconforming item reports involving deviation from design bases such as "use as is" or "repair" are forwarded to the appropriate engineering organization for review, and disposition. Applicable information is accumulated and records are maintained.

The need to release/use nonconforming materials, parts or components shall be based on such considerations as:

a. Impact on plant safety;

b. Safety of personnel;

c. Suitability of items in the "as is" condition, i.e., probability of eventual satisfactory resolution of the nonconforming condition without repair, rework or replacement.

d. Accessibility of items after release;

e. Cost of removal and repair or replacement should items eventually have to be removed, repaired, or replaced;

f. Effect on the orderly progress of work.

Items repaired are verified by inspecting the items as originally inspected or by a documented method which is equivalent to the original inspection method. Items reworked may require inspection to verify conformance to requirements as defined in applicable procedures.

Nuclear Oversight performs audits and surveillances, as appropriate, to verify that dispositions for reports documenting nonconforming conditions are adequate.

15.2.4 RECURRENCE CONTROL

A trend analysis of nonconforming conditions documenting program/procedural problems is performed in accordance with procedures. The trend analysis results are periodically reported to upper management, including the senior onsite and offsite nuclear officers and the senior manager responsible for measuring the effectiveness of the quality assurance program, for review and assessment as part of the Station Corrective Action Program reporting as described in QAP 16.0, Corrective Action.

16.0 CORRECTIVE ACTION

16.1 GENERAL REQUIREMENTS

This NUQAP requires that an effective corrective action program be established to assure that conditions adverse to quality at the Millstone Power Station are promptly identified, corrected, and documented in accordance with procedures. These procedures include measures for reporting to appropriate levels of management and determining the root cause and corrective action to preclude recurrence for conditions evaluated as significant conditions adverse to quality.

16.2 IMPLEMENTATION

16.2.1 PROGRAM

Procedures define personnel responsibilities and establish various measures for identification, documentation, review, engineering evaluation, disposition and correction of conditions adverse to quality. The means to identify conditions adverse to quality are available to all NU and vendor personnel assigned to the Millstone Power Station and other personnel involved with Station quality activities.

16.2.2 CORRECTIVE ACTION AND FOLLOW-UP

Procedures describe the measures taken to evaluate if conditions adverse to quality exist and to determine the need for immediate corrective action or disposition. Vice Presidents are responsible for assuring their assigned personnel and their vendors working onsite comply with the corrective action program and for assuring that corrective action is adequate and properly implemented in a timely manner within their organization. The Nuclear Oversight Department performs audits and surveillances, as appropriate, to verify that NUSCO/NNECO departments are effectively complying with this NUQAP and procedural requirements for the corrective action program and that corrective action is adequate and properly implemented in a timely manner. Audits, surveillances, and inspections, are performed, as appropriate to assure that vendors comply with their corrective action program and that corrective action is adequate.

The ***Senior Vice President and Chief Nuclear Officer - Millstone*** has the final authority in the event that agreement on the action to be taken is not reached at lower levels of the nuclear organization.

16.2.3 RECURRENCE CONTROL

Procedures identify responsibility and provide direction for determining appropriate significance level based on actual or potential consequences for conditions adverse to quality.

The significance level determines the need for a root cause determination and for establishing the necessary action to prevent recurrence. In cases of significant conditions adverse to quality, the immediate corrective action, the cause, and recurrence control actions must be documented. Procedures establish the responsibilities and measures taken to accomplish these actions.

An analysis of adverse conditions is performed and trends which identify program/procedure problems are periodically reported to upper management, including the senior onsite and offsite nuclear officers and the senior manager responsible for measuring the effectiveness of the quality assurance program for review. Adverse trends concerning specific vendor performance shall be reported to the affected vendor for resolution and recurrence control, as appropriate.

17.0 QUALITY ASSURANCE RECORDS

17.1 GENERAL REQUIREMENTS

This NUQAP requires the maintenance, identification, retention and retrieval of records to furnish evidence of quality activities performed for the Millstone Station nuclear power plants be implemented in accordance with procedures. These records include but are not limited to: operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance and material analyses. These records also include closely related data such as qualifications of personnel, procedures and equipment. Inspection and test records contain, as a minimum but are not limited to: identification of inspector or data recorder and the acceptability and the action taken in connection with any deficiencies and reportable occurrences noted. Procedures establish requirements concerning record retention such as duration, location and assigned responsibility.

17.2 IMPLEMENTATION

NUSCO/NNECO procedures establish the responsibilities and requirements for the maintenance, identification, retention (e.g., duration, location) and retrievability of records pertaining to materials, equipment, parts, processes or operations relating to quality structures, systems, and components which when founded on observations, measurements or tests can be fully verified, and documented by cognizant personnel.

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible to implement measures for identification, maintenance, retention, retrieval and turnover to NNECO of documented and approved records which contain objective evidence of quality as specified in purchase orders/contracts. Audits, surveillances, and inspections, are performed, as appropriate, to verify that these vendors are effectively complying with their program for quality assurance records.

NUSCO/NNECO quality assurance records are identified, controlled and maintained in appropriate files and are identifiable to specific structures, systems, and components within the Station nuclear power plants. When identification to a specific structure, system, or component is not practical, records are filed by category (e.g., specification, nonconformance reports, audits, etc.).

17.3 RETENTION

NUSCO/NNECO quality assurance records are classified as life records or non-life records as delineated by Nuclear Document Services. Non-life records are those documents that are maintained for a specific period of time other than the lifetime of a Station nuclear power plant or the particular component or part. Life records are those documents that are maintained for the lifetime of the in-service nuclear power plant or for the life of the particular component or part. In instances where more than one licensing basis document specifies a record retention requirement and they are different (e.g. QA Program commitment versus Unit Technical Specifications) the more restrictive requirement shall apply. Life records are those which would be of significant value in meeting one or more of the following criteria:

a. Demonstrating capability for safe operations;

b. Maintaining, reworking, repairing, replacing or modifying the item;

c. Determining the cause of an accident or malfunction of an item;

d. Providing required base line data for in-service inspection.

Quality assurance records are reviewed and approved by the cognizant qualified NUSCO/NNECO personnel and vendors, as appropriate, and are transmitted to the Station Nuclear Document Records Facility. The responsibility of the Nuclear Document Services Facility upon receipt of records is to maintain and provide controlled retrievability of records affecting the Station nuclear power plants, in such a manner as to prevent destruction of records by fire, flood, theft, and environmental conditions, such as temperature or humidity, as delineated in applicable procedures.

18.0 AUDITS

18.1 GENERAL REQUIREMENTS

This NUQAP requires that a comprehensive system of planned and periodic audits shall be carried out to verify that quality activities for Millstone Station nuclear power plants are performed in compliance with this NUQAP and to determine the effectiveness of the program.

Audits are conducted in accordance with written procedures or checklists by appropriately trained personnel not having direct responsibilities in the areas being audited.

Audit results are documented and reviewed by management having responsibility in the area audited and the responsible management takes the necessary action to address any audit findings revealed by the audit.

18.2 IMPLEMENTATION

18.2.1 PROGRAM

The audit program requires audits of Corporate and Station nuclear power plant quality activities under the oversight of the Nuclear Safety Assessment Board. Audits are performed on activities where the requirements of 10 CFR 50, Appendix B and respective nuclear unit Technical Specifications are being implemented. In addition to those activities, audits are performed on areas associated with indoctrination and training programs, interface control among NNECO and vendors, vendor quality programs and the Nuclear Materials and Document Management procurement function. Audits are regularly scheduled on the basis of the status and safety importance of the activities being performed. Regularly scheduled audits are supplemented by audits for one or more of the following conditions:

a. When significant changes are made in functional areas of the quality assurance program, such as significant reorganization or procedure revisions;

b. When it is suspected that the quality of the item is in jeopardy due to deficiencies in the quality assurance program;

c. When a systematic, independent assessment of program effectiveness is considered necessary;

d. When necessary to verify implementation of required corrective action.

Schedules for the audit of Corporate, and Station, quality activities are originated and maintained by the Nuclear Oversight Department. Schedules for vendor quality assurance activities are maintained by the Nuclear Materials and Document Management and Nuclear Oversight Department, as appropriate.

Audits are performed as specified in procedures by qualified personnel, using an audit plan prepared by the auditing organization. Audits may include evaluation of the work areas, activities, processes, items, and review of documents and records to determine the effectiveness of implementation and conformance to this NUQAP.

Approved vendors utilized to perform quality activities for the Station nuclear power plants are responsible for developing and implementing a system of planned and periodic audits to verify compliance with and to determine the effectiveness of all aspects of their quality assurance program. Nuclear Materials and Document Management is responsible for verifying the acceptability of vendor audit programs. Audits, are performed as appropriate, to verify that these vendors are effectively complying with their quality assurance requirements.

In addition to the audits, other methods, such as surveillances and inspections are used to assure that quality activities are in compliance with this NUQAP.

18.2.2 REPORTING OF AUDIT RESULTS

Audit results are reviewed, approved, and reported in accordance with Nuclear Oversight Department and Nuclear Materials and Document Management procedures, as applicable. The audit reports are issued to the appropriate management of the area audited to assure appropriate and/or timely corrective action is taken to address conditions adverse to quality identified by the audit findings. In addition, audit data and reports are accumulated as part of the review for quality trends and assessed to assure the effectiveness of this NUQAP.

18.2.3 REVIEW, ACTION, AND FOLLOW-UP OF AUDIT FINDINGS

Audit findings that involve conditions adverse to quality are reviewed and investigated by the management having the responsibility for the area audited. The responsible management is required to take the necessary action to address any conditions adverse to quality identified by the audit and: report the results of such reviews and investigations, take the necessary actions to correct problems reported, and report the completion of corrective action within specified time frames.

Follow-up of audit findings involving conditions adverse to quality is performed by the auditing organization as necessary to verify appropriate actions have been taken to resolve audit findings. Items which cannot be resolved by affected management are submitted for resolution to the ***Senior Vice President and Chief Nuclear Officer - Millstone***.

18.2.4 RECORDS/REPORTS OF AUDITS

Audit records, reports, and associated documentation are retained in the Station Nuclear Document Services Facility, as specified in applicable procedures.