



Entergy Nuclear Generation Company  
Pilgrim Nuclear Power Station  
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ENGCLtr. 2.00.055

10CFR(54)(a)(3)

U.S. Nuclear Regulatory Commission  
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License DPR-35  
Docket 50-293

Subject: Annual Submittal of Changes to the Entergy Nuclear Generation Company  
Quality Assurance Program Description for Pilgrim Nuclear Power Station

As required by 10CFR50.54(a)(3), Entergy Nuclear Generation Company submits the annual report of changes made to the Entergy Nuclear Generation Company (ENGCL) Quality Assurance Program Description as described in the Pilgrim Quality Assurance Manual (PQAM). This report [Enclosure (A)] covers the period from July 1999 through June 2000.

During the reporting period, three sections of the PQAM were revised under separate PQAM Change Requests. These changes are part of an ongoing effort to revise the entire manual to reflect the sale of Pilgrim Station to Entergy Nuclear Generation Company. The intent of this revision effort is to make the required changes and, at the same time, increase corporate QA program flexibility by presenting discussion in a manner consistent with the format (SRP 17.3) and level of detail prescribed in the Entergy Operations, Inc. (EOI) QA Manual applicable to other nuclear stations operating within state regulated markets.

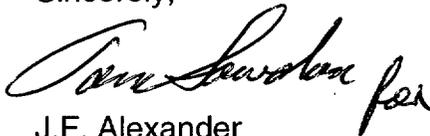
These PQAM revisions involve two changes that have been classified as reductions in commitment to the QA Program Description within the Pilgrim Updated Final Safety Analysis Report (UFSAR) previously approved by the NRC. These reductions in commitment have been evaluated as not requiring prior NRC approval based on 10CFR50.54(a) as clarified by NRC Direct Final Rule 64FR9029. The reductions in commitment represent program areas that have been previously addressed to the NRC by other licensees and approved under documented NRC Safety Evaluation Reports (SERs). Entergy has evaluated the previously issued SERs, as well as the basis of NRC approval, and determined the basis to be acceptable for application at Pilgrim Station.

Q004

ENGC Ltr. 2.00.055

Enclosure (A) consists of the Annual Report, a copy of the revised PQAM sections, and the documentation generated during the preparation and issuance of these revisions. This documentation clearly identifies the changes made, the reasons for change, and the basis of continued 10CFR50 Appendix B compliance. As appropriate, the results of reviews under Direct Final Rule 64 FR9029 are also included.

Sincerely,



J.F. Alexander

RJS/RLC/sjs

Enclosure: (A) Annual Report of Pilgrim Quality Assurance Manual Changes  
(July 1999 through June 2000)

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**ANNUAL REPORT  
OF  
PILGRIM QUALITY ASSURANCE MANUAL CHANGES  
[July 1999 through June 2000]**

- Attachments:   A   PQAM Section 1 Change Documentation—PQAM Change Request No. 00-01  
                  B   PQAM Section 4 Change Documentation—PQAM Change Request No. 00-02  
                  C   PQAM Section 7 Change Documentation—PQAM Change Request No. 00-03

**SUMMARY OF CHANGES**

In order to reflect the new ownership, the revised organizational structure, and the realignment of responsibilities in effect after the transfer of the Station's operating license to Entergy Nuclear Generation Company (ENGC), an effort to rewrite the Pilgrim Quality Assurance Program completely has been undertaken. The intent of this effort is to make the required changes and, at the same time, increase corporate QA program flexibility by presenting discussion in a manner consistent with the format and level of detail prescribed in the Entergy Operations, Inc. (EOI) QA Manual. The EOI QA Manual for the state-regulated plants is the product of an effort that combined the quality systems employed at each plant under a common QA Program document. In doing this, EOI used the format of NRC Standard Review Plan 17.3.

During the reporting period, three PQAM Change Requests were processed involving Sections 1, 4, and 7 of the program document, which resulted in a complete rewrite of each section. These revisions are the first in a series of changes that will rewrite the entire program under an SRP 17.3 format. The completed document will yield a common quality assurance philosophy, methodology, and commitment within Entergy Corporation.

The detailed evaluations of the changes made are documented in Attachments A, B and C. The vast majority of changes has been classified as General Program Changes that were made to reflect the sale of PNPS to ENGC, the revised organizational structure, and the realigned functional responsibilities under a format consistent with NRC SRP 17.3. The four remaining changes have been classified as Specific Program Changes, two of which involve a reduction in QA Program commitments.

All of the changes have been evaluated as being acceptable in that they have no adverse program effect relative to the applicable criteria of 10CFR50 Appendix B. Additionally, none of the changes, including the two reductions in QA Program commitment, required prior NRC approval based on guidance within NRC Direct Final Rule 64FR9029. The reductions in commitment represent changes previously addressed to the NRC by other licensees and approved as documented under NRC Safety Evaluation Reports.

The basis of the NRC approval for these reductions in commitment has been evaluated and found acceptable for application at PNPS.

## **PQAM CHANGE DESCRIPTIONS**

### **PQAM CHANGE NO. 00-01**

#### **Section 1, "Organization"**

**Revision 0, 4/14/00**

#### **CHANGE IDENTIFICATION**

As indicated in Attachment A, Section 1 was completely rewritten to address the sale of Pilgrim Station to Entergy Nuclear Generation Company. In general, the previous wording of Section 1 that addresses the Pilgrim organization by identifying the roles and responsibilities of key positions, departments, and groups has been replaced with text that describes the organization from a functional area perspective.

Within Attachment A, PQAM Change Request 00-01 Attachment 1 provides a verbatim copy of the previous revision in a matrix form that identifies the disposition of text as compared to the new revision. This attachment identifies two Specific Program Changes, with the balance of changes classified as General Program Changes. The General Program Changes involve the description of the new organization and revised functional responsibilities under an SRP 17.3 format. The two Specific Program Changes pertain to the deletion of the PNPS Organization Chart and the modified reporting chain for the manager responsible for quality assurance.

#### **REASON FOR CHANGES**

This revision to Section 1 was necessary in order to describe effectively the revised organizational structure and the realignment of functional responsibilities under an SRP 17.3 format. The change from a format consistent with SPR 17.1 to a format consistent with SRP 17.3 was made to achieve consistency with the Entergy Operations, Inc. (EOI) QA Manual applied to nuclear plants operating under state regulated markets.

#### **BASIS OF CONTINUED 10CFR50 APPENDIX B COMPLIANCE**

The General Program Changes have been evaluated as having no adverse program effect in that the revised text effectively addresses the applicable criteria of 10CFR50 Appendix B and continues to support compliance with this regulation.

The two Specific Program Changes pertain to the deletion of the PNPS Organization Chart and the modified reporting chain for the manager responsible for quality assurance. Neither of these changes was determined to be a reduction in QA Program commitment. Accordingly, these changes also have no adverse program effect and continue to address the applicable criteria of 10CFR50 Appendix B effectively (see PQAM Change Request 00-01 for details).

The evaluation under PQAM Change Request 00-01 concludes that the new method of describing the Station organization, the deletion of the PNPS Organization Chart, and the modified reporting chain relative to the manager responsible for quality assurance satisfy 10CFR50 Appendix B. Further, the changes made are addressed in 10CFR50.54 and Direct Final Rule 64FR9029 as being acceptable without prior NRC approval.

**PQAM CHANGE NO. 00-02**

**Section 4, "Procurement Document Control"**

**Revision 0, 4/14/00**

**CHANGE IDENTIFICATION**

As indicated in Attachment B, Section 4 was completely rewritten. In general, the previous wording of Section 4 that addressed procurement document control measures and the roles and responsibilities of key positions, departments, and groups has been replaced with text that describes this program element from a functional area perspective.

Within Attachment B, PQAM Change Request 00-02 Attachment 1 provides a verbatim copy of the previous revision in a matrix form that identifies the disposition of text as compared to the new revision. The evaluation of this revision has identified two Specific Program Changes, with the balance of changes classified as General Program Changes.

The General Program Changes involve the significant reduction of descriptive text that resulted in the change from a format consistent with SPR 17.1 to a format consistent with SRP 17.3.

The two Specific Program Changes involve the transfer of QA procurement document review responsibility to the SCM organization, as well as changing to an ongoing supplier performance evaluation process in lieu of the annual evaluations previously performed.

**REASON FOR CHANGES**

This revision to Section 4 was necessary to convert to an SRP 17.3 format and to address procurement document control measures under the new organization after the sale of Pilgrim Station to Entergy Nuclear Generation Company.

The delegation of the Entergy Material Requirements (EMR) group (Jackson, MS) to perform the supplier QA control function has also resulted in the utilization of an ongoing supplier performance evaluation process in lieu of the annual evaluation process previously employed.

**BASIS OF CONTINUED 10CFR50 APPENDIX B COMPLIANCE**

The General Program Changes have been evaluated as having no adverse program effect in that the revised text effectively addresses the applicable criteria of 10CFR50 Appendix B. The significant reduction in descriptive text is also in line

with the format of SRP 17.3. Where text has been deleted, it was verified that the content was redundant to text already contained in ANSI Standards committed to within the PQAM and/or more appropriately addressed in implementing procedures. Text no longer relevant under the new ownership has also been appropriately deleted.

The two Specific Program Changes were determined to be reductions in QA Program commitments that do not adversely impact QA Program compliance to 10CFR50 Appendix B. Further, these changes were determined to be acceptable based on the evaluated application of a previous and similar program change made by other licensees that have been approved by the NRC and documented in a Safety Evaluation Report. Under the guidance of 10CFR50.54(a) and Direct Final Rule 64FR9029, these reductions in commitment do not require NRC approval prior to issuance.

Refer to PQAM Change Request 00-02 for evaluation details relative to both types of changes made in the revised Section 4.

### **PQAM CHANGE NO. 00-03**

#### **Section 7, "Control of Purchased Material, Equipment, and Services"**

**Revision 0, 4/14/00**

#### **CHANGE IDENTIFICATION**

As indicated in Attachment C, Section 7 was completely rewritten. In general, the previous wording of Section 7 that addressed measures to control purchased items and services and describes the roles and responsibilities of key positions, departments, and groups has been replaced with text that describes this program element from a functional area perspective.

Within Attachment C, PQAM Change Request 00-03 Attachment 1 provides a verbatim copy of the previous revision in a matrix form that identifies the disposition of text as compared to the new revision. The evaluation of this revision has identified one Specific Program Change, with the balance of changes classified as General Program Changes.

The General Program Changes involve the significant reduction of descriptive text through abbreviation or deletion of text in line with an SRP 17.3 format.

The Specific Program Change relative to the supplier performance evaluation process, which is discussed in PQAM Change Request 00-02, also applies to the PQAM Section 7 revision. The results of item and service acceptance activities at PNPS, including in-service data relative to the performance and reliability of these items and services, are used in the supplier performance evaluation process.

## **REASON FOR CHANGES**

The revision to Section 7 was necessary to convert to an SRP 17.3 format and to address measures to control purchased items and services under the new organization after the sale of Pilgrim Station to Entergy Nuclear Generation Company.

The delegation of the Entergy Material Requirements group (Jackson, MS) to perform the supplier QA control function has also resulted in the utilization of an ongoing supplier performance evaluation process in lieu of the annual evaluation process previously employed.

## **BASIS OF CONTINUED 10CFR50 APPENDIX B COMPLIANCE**

The General Program Changes have been evaluated as having no adverse program effect in that the revised text effectively addresses the applicable criteria of 10CFR50 Appendix B using an SRP 17.3 format. The significant reduction in descriptive text is also in line with the format of SRP 17.3. Additionally, where text has been deleted, it was verified that the content was either redundant to text already contained in ANSI Standards committed to within the PQAM and/or more appropriately contained in implementing procedures. Text no longer relevant under the new ownership has also been appropriately deleted.

As discussed under PQAM Change Request 00-02, the Specific Program Change was determined to be a reduction in commitment that does not adversely impact QA Program compliance to 10CFR50 Appendix B.

Refer to Attachment C for evaluation details relative to both types of changes made in the revised Section 7.

ATTACHMENT A

Annual Report of PQAM Changes



**Entergy**

*Entergy Nuclear Generation Company*

RTYPE: H8.46

*Pilgrim Nuclear Power Station*

**PILGRIM QUALITY ASSURANCE MANUAL (PQAM)  
SECTION 1**

**ORGANIZATION**

Rev. 0  
Effective Date: 04/14/00

# ***ORGANIZATION***

## **1.1 PURPOSE**

This Section of the Pilgrim Quality Assurance Manual (PQAM) describes the organizational structure of Entergy Nuclear Generation Company (ENGCO) and defines the QA Program authorities, responsibilities, and interfaces of key executives, managers, and groups participating in the operation of the Pilgrim Nuclear Power Station (PNPS).

## **1.2 ORGANIZATION**

The organizational structure responsible for the implementation of the Pilgrim Quality Assurance Program is described below in Section 1.3. The specific organization titles for the quality functions described are identified in lower tier procedures. The authority to accomplish the quality assurance functions described is delegated as necessary to fulfill the identified responsibility. The Nuclear Regulatory Commission (NRC) is notified of organizational changes as required by Technical Specifications (Tech Specs) and 10CFR50.54(a).

On-site and off-site safety review committees have been established that independently review activities to provide additional assurance that the Station is operated and maintained in accordance with the operating license and applicable regulations that address nuclear safety.

## **1.3 KEY EXECUTIVE AND MANAGERIAL POSITIONS**

### **1.3.1 Executives**

The Chief Executive Officer (CEO) of Entergy Nuclear, Inc. (ENI) is responsible for providing top level direction of all activities associated with the safe and reliable operation of Entergy's nuclear sites. The CEO provides guidance with regard to Company quality assurance policy.

The Chief Executive Officer has designated the Vice President Operations Pilgrim to serve as the chief Station officer responsible for the implementation of all activities associated with the safe and reliable operation of the Station. He is responsible for establishing policies, goals, and objectives; directing the functions of the safety review committees; and the adequacy of the QA Program, including its effective implementation. He is the officer to whom defects and noncompliances relating to nuclear safety hazards are to be reported and is designated as the officer responsible for notifying the NRC of defects and noncompliances when required by 10 CFR Part 21.

Executive Directors report to the Vice President Operations Pilgrim with the following divisions of responsibility:

- Station operations, which include plant production, operations, facility services, and training.
- General services, which include supply chain management, document control, records administration, and computer applications.
- Nuclear engineering and assessment, which include design and system engineering, quality assurance, regulatory relations, corrective action, and emergency preparedness.

### 1.3.2 Managers

Station Directors serving as managers report to the Executive Directors identified above. These individuals may report through an additional layer of management, but shall maintain sufficient authority and organizational freedom to implement the assigned responsibilities. One Director has been assigned responsibility for each of the manager functions described below. A Director may have responsibility for more than one function. Within the scope of each Director's responsibility, support management staff has been assigned to ensure the effective control.

- The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the adequacy and implementation of the Quality Assurance Program as described in this Pilgrim Quality Assurance Manual (PQAM). This responsibility also includes the ASME XI In-service Inspection (ISI) Program, the evaluation and approval of suppliers, and the verification and acceptance of purchased items. The manager responsible for quality assurance has the authority, responsibility, and organizational freedom to escalate matters directly to the Vice President Operations Pilgrim.

In order to implement these responsibilities, the manager responsible for quality assurance is provided with "stop work" authority whereby he can suspend any quality-related activity or process that may, in his opinion, adversely affect the safe operation of Pilgrim Nuclear Power Station.

Personnel performing quality assurance functions have sufficient authority and organizational freedom to identify quality problems; initiate, recommend, or provide solutions through designated channels; and verify implementation of solutions.

- The manager responsible for operations assures the safe, reliable, and efficient operation of the plant within the constraints of applicable regulatory requirements and the operating license. The functional responsibilities include:

- operations;
  - operation production controls;
  - operations support inclusive of reactor engineering and fuel procurement; and
  - chemistry.
- The manager responsible for plant production assures the effective maintenance and modification of the plant. The functional responsibilities include:
    - maintenance;
    - modification implementation;
    - outage and project management;
    - integrated scheduling and risk management; and
    - maintenance programs.
  - The manager responsible for asset management administers engineering services. Functional responsibility includes design engineering, system engineering, safety analyses and evaluations, and the In-service Testing (IST) Program.
  - The manager responsible for nuclear services administers radiological protection and waste processing.
  - The manager responsible for supply chain management administers materials and component engineering and the purchasing of items and services that support Station operations and comply with Quality Assurance Program requirements.
  - The manager responsible for training provides for the training and certification of operating personnel as well as the technical training of plant support personnel.
  - The manager responsible for records administration and procedures provides direction, control, and overall supervision of the records management and document control systems.
  - The manager responsible for the Corrective Action Program provides direction, control, and overall supervision of the corrective action process.
  - The manager responsible for emergency preparedness provides direction, control, and overall supervision of the PNPS Emergency Plan.
  - The manager responsible for regulatory relations provides for the effective administration of the plant license, Technical Specifications, and the Updated Final Safety Analysis Report (UFSAR), as well as the coordination of the Station organization's response to industry and regulatory issues.

#### **1.4 AUTHORITY AND RESPONSIBILITY**

ENG C personnel have responsibility for the scope and implementation of an effective Quality Assurance Program. ENG C personnel may delegate all or part of the activities of planning, establishing, and implementing the Quality Assurance Program to others, but responsibility for the Program's effectiveness is retained by ENG C.

ENG C personnel ensure the applicable portions of the Program are documented and approved and that personnel are trained with resources available before an activity within the scope of the Pilgrim QA Program is undertaken. The manager responsible for the applicable quality function approves procedures that implement the Program. These procedures are to reflect the Program and work is to be accomplished in accordance with the procedures.

Individual managers are to ensure that personnel working under their cognizance are provided the necessary training and resources to accomplish their assigned tasks. These managers coordinate activities and problem resolution through appropriate interface with affected groups and institute remedial action to correct and preclude unsatisfactory conditions.



PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)

CHANGE REQUEST NO. 00-01

SECTION 1 REV. NO. 0 PARAGRAPH NO. All PAGE NO. All

REVISION (exact wording)

This section has been rewritten in its entirety; therefore, no mark-up of Revision 31 is provided and no revision bars are included in Revision 0. See Attachment 1 for information relative to the existing text, the disposition of this text, and the revised wording.

PURPOSE OF REVISION

To reflect the new ownership of Pilgrim Nuclear Power Station, the revised organizational structure, and the realignment of responsibilities in effect after the transfer of the Station's operating license to Entergy Nuclear Generation Company (ENGC).

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Richard J. Mummell 1/28/00  
ORIGINATOR Date

4/14/00  
EFFECTIVE DATE

APPROVAL SIGNATURES

M. Bellon 3/16/00  
VICE PRESIDENT, OPERATIONS PILGRIM Date

[Signature] 2/24/00  
VICE PRESIDENT, STATION DIRECTOR Date

A. J. Oberin 2/22/00  
DIRECTOR, DESIGN ENGINEERING Date

[Signature] 2/7/00  
DIRECTOR, NUCLEAR ASSESSMENT Date

# QA PROGRAM CHANGE EVALUATION

PQAM Change Request No. 00-01

Section No. 1

Rev. 0

## EVALUATION

Does the above change to the QA Program reduce the commitments concerning:

Yes No

- 10CFR50, Appendix B
- Program coverage documentation (policies, procedures, or inspections)
- Policy, procedure, or instruction compliance
- Identification of structure systems, and components
- Identification of major participating organizations and their designated functions
- Providing control over activities affecting the quality of the identified structures, systems, and components
- Controlling conditions under which activities affecting quality are to be accomplished (e.g., equipment, environmental conditions, prerequisites)
- Attaining required quality (e.g., special controls, processes, test equipment, tools, or skills)
- Verification of quality by inspection and test
- Providing indoctrination and training of personnel performing activities affecting quality
- Regularly reviewing the status and adequacy of the QA Program
- Periodic review for status and adequacy by participating organization Managers of the part of the QA Program which they are executing
- Other (explain) -- none --

10307 1031

## QA PROGRAM CHANGE EVALUATION (cont.)

PQAM Change Request No. 00-01

### CONCLUSION

Section 1 of the Pilgrim Quality Assurance Program, as revised, continues to satisfy 10CFR50, Appendix B. The changes made within this section meet the criteria within 10CFR50.54(a) as clarified by Direct Final Rule 64FR9029 relative to QA program changes that can be made without prior NRC approval.

### CHANGE EVALUATION

In order to reflect the new ownership, the revised organizational structure, and the realignment of responsibilities in effect after the transfer of the Station's operating license to Entergy Nuclear Generation Company (ENGCO), a complete rewrite of Section 1 to the Pilgrim Quality Assurance Manual (PQAM) has been prepared. The intent of the revision is to make the required changes and, at the same time, increase corporate QA program flexibility by presenting discussion in a manner consistent with the format and level of detail prescribed in the Entergy Corporation (Entergy) QA Program applicable to the other nuclear stations operating under regulated markets. The Entergy QA Program for the regulated plants is the product of an effort that combined the quality systems employed at each regulated plant under a common QA Program document. In doing so, Entergy used the format of NRC Standard Review Plan 17.3. This common QA Program contained reductions in commitments and, as required by 10CFR50.54(a), was reviewed and approved by the NRC prior to issuance.

This revision to Section 1 is the first in a series of program changes which will rewrite the entire program under an SRP 17.3 format that describes the QA Program in a manner consistent with the level of detail prescribed in the Entergy QA Program applied to the regulated plants. The completed document will serve as a model for other nuclear plant acquisitions by ENGCO, which will yield a common quality assurance philosophy, methodology, and commitment within the corporation and maximize potential for shared resource applications among the Entergy family of operating nuclear units.

It is important to note that SRP 17.3 is significantly different than SRP 17.1, which is the document used by the NRC to review and accept previous editions of the Pilgrim QA Program. SRP 17.1 provides specific review criteria relative to the need to identify the organization through discussion of the roles and responsibilities of key position titles and names of departments as well as the need for organization charts that reflect lines of reporting and key program interfaces. On the other hand, SRP 17.3 review criteria are less specific, allowing the description of the organization to be provided from a functional area of responsibility perspective.

The previous wording of Section 1 (which addresses the Pilgrim organization by identifying the roles and responsibilities of key positions, departments, and groups) has been replaced with text that describes the organization from a func-

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tional area perspective. The revision satisfies Criterion I of 10CFR50, Appendix B, identifying the levels of Station management (executive directors and managing directors), the realigned divisions of functional area responsibility, and the associated program authority for the functional areas described. With the exception of the title of Vice President Operations Pilgrim (formerly the position of Senior Vice President, Nuclear), all position titles of lower authority and reference to departments or groups by name have been deleted. Accordingly, the PNPS organizational charts depicted in Figures 1-1 and 1-2 have also been deleted in line with SRP 17.3 criteria, with no adverse program effect.

In addition to the revised method of describing the Station organization, the reporting chain for the manager responsible for quality assurance has been modified. The previous Section 1 identifies the manager responsible for quality assurance as reporting directly to the Senior Vice President, Nuclear. Under the new organization, the manager responsible for quality assurance has been assigned other functions governed by the QA Program. Accordingly, the manager responsible for quality assurance now reports to the Vice President Operations Pilgrim through the executive director responsible for nuclear engineering and assessment. While under this organization the manager responsible for quality assurance reports through an additional layer of management, he has been assigned the specific authority and responsibility to escalate matters directly to the Vice President Operations Pilgrim (reference paragraph 1.3.2 of the revision). As such, this authority establishes the organizational freedom and independence of the manager and his assigned staff, providing direct access to an appropriate level of management relative to quality assurance matters.

Attachment 1 to this evaluation provides a verbatim copy of the previous Section 1 in a matrix form that identifies the disposition of the text and the associated wording contained in the new revision. Attachment 2 documents the evaluation of the revised Section 1 relative to the criteria of SRP 17.3. These comparisons confirm continued QA Program adequacy and ensure all program elements have been addressed in the revised text or identified and deferred for action during subsequent PQAM revisions that are part of the overall effort to reformat the entire QA Program.

This evaluation has determined that the revised method of describing the Station organization and the modified reporting chain relative to the manager responsible for quality assurance satisfy 10CFR50, Appendix B. Further, the changes made are addressed in 10CFR50.54 and Direct Final Rule 64FR9029 as being acceptable without prior NRC approval.

Prepared by: Richard J. Munnell 1/28/00  
Cognizant QA Engineer Date

Approved by: R. S. Newton 2/7/00  
Superintendent, Nuclear (QA) Date

W. H. [Signature] 2/4/00  
Manager, Team (QA Assessment) Date

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**PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)**

**ATTACHMENT 1**

**To**

**QA PROGRAM CHANGE EVALUATION**

**CHANGE REQUEST NO. 00-01**

**For**

**SECTION 1  
Revision 0**

1 0 3 0 7 1 0 3 4

## TEXT DISPOSITION CATEGORIES

- Type A = Text revised to reflect the new ownership, the revised organization, or the resultant realignment of responsibilities.
- Type B = Text revised or deleted to provide discussion in a manner consistent with SRP 17.3 and the level of detail provided in the Entergy QA Manual applied at the regulated plants.
- Type C = Text deleted as not relevant under the new ownership.
- Type D = Text revised or deleted reflective of a QA Program requirement and/or commitment change.
- Type E = Text adopted virtually as written.

1 0 3 0 7 1 0 3 5

BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
<p style="text-align: center;"><b>ORGANIZATION</b></p> <p>1.0 <u>PURPOSE</u></p> <p><i>This section describes the Nuclear Division and other Business Units of Boston Edison Company (BECo) involved in the operation of Pilgrim Nuclear Power Station (PNPS). In addition, it describes the responsibilities governed by the Quality Assurance Program.</i></p>	Type A	<p style="text-align: center;"><b>ORGANIZATION</b></p> <p>1.1 <u>PURPOSE</u></p> <p>This Section of the Pilgrim Quality Assurance Manual (PQAM) describes the organizational structure of Entergy Nuclear Generation Company (ENGC) and defines the QA Program authorities, responsibilities, and interfaces of key executives, managers, and groups participating in the operation of the Pilgrim Nuclear Power Station (PNPS).</p>
<p>1.1 <u>Organization</u></p> <p><del>The BECo Nuclear Division is depicted in Figures No. II-1-1 and II-1-2. The organization for Pilgrim Nuclear Power Station is further detailed in the Technical Specifications. Changes in Boston Edison's Nuclear Division are reported to the Nuclear Regulatory Commission in accordance with the Technical Specification requirements. Quality related activities associated with the operational phase of Pilgrim Nuclear Power Station are performed primarily by the Nuclear Division. These operational phase activities are governed by the requirements established in the Boston Edison Quality Assurance Manual (BEQAM) for Operation of Pilgrim Nuclear Power Station. Other Divisions within Boston Edison that are subject to certain requirements of the BEQAM are:</del></p> <ul style="list-style-type: none"> <li><del>— Corporate Services Division:</del></li> <li><del>— Planning and Acquisition Department</del></li> <li><del>— Distribution and Warehouse Department</del></li> <li><del>— Field Engineering Department</del></li> </ul> <p><b>Boston Edison has established the following committees which perform quality related functions:</b></p> <ul style="list-style-type: none"> <li>• Nuclear Safety Review and Audit Committee (NSRAC)</li> <li>• Operations Review Committee (ORC)</li> </ul> <p><b>The makeup, qualifications, and responsibilities of these committees are described in the Technical Specifications for Pilgrim Nuclear Power Station. NSRAC members are appointed by the Senior Vice</b></p>	<p style="text-align: center;"><del>Type D <b><u>Program Change</u></b> <b><u>See Change Evaluation</u></b></del></p> <p style="text-align: center;">Type B</p> <p style="text-align: center;">Type C</p> <p style="text-align: center;">Type C</p> <p style="text-align: center;">Type C</p> <p style="text-align: center;">Type B</p> <p style="text-align: center;">Type B</p>	<p>1.2 <u>ORGANIZATION</u></p> <p>The organizational structure responsible for the implementation of the Pilgrim Quality Assurance Program is described below in Section 1.3. The specific organization titles for the quality functions described are identified in lower tier procedures. The authority to accomplish the quality assurance functions described is delegated as necessary to fulfill the identified responsibility. The Nuclear Regulatory Commission (NRC) is notified of organizational changes as required by Technical Specifications (Tech Specs) or 10CFR50.54(a).</p> <p>On-site and off-site safety review committees have been established that independently review activities to provide additional assurance that the Station is operated and maintained in accordance with the operating license and applicable regulations that address nuclear safety</p>

10307

BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
<p><b>President, Nuclear.</b></p> <p>The corporate organization is more fully described in Boston Edison's Corporate Organization Manual.</p>	Type C	
<p>1.2 <b><u>Key Management Responsibilities and Authority</u></b></p> <p>1.2.1 <b><u>Executive Office</u></b></p> <p><b>The Chief Executive Officer is the President and Chairman of the Boston Edison Company. He is subject to the direction of the Board of Directors, and he supervises the administration of the business and affairs of the corporation.</b></p> <p>The Chairman has such powers and duties as may from time to time be prescribed by the Board of Directors. He is also the Chairman of the Executive Committee of the Board of Directors.</p> <p>The Senior Vice President, Nuclear is a senior corporate officer responsible for the administration and conduct of company business relating to specific areas as assigned within the Executive Office. The Executive Office is further described in Boston Edison Company's Corporate Organization Manual.</p>	<p>Types A and B</p> <p>Type C</p> <p>Type C</p> <p>New Text</p> <p>New Text</p> <p>New Text</p>	<p>1.3 <b><u>KEY EXECUTIVE AND MANAGERIAL POSITIONS</u></b></p> <p>1.3.1 <b><u>Executives</u></b></p> <p>The Chief Executive Officer (CEO) of Entergy Nuclear, Inc. (ENI) is responsible for providing top level direction of all activities associated with the safe and reliable operation of Entergy's nuclear sites. The CEO provides guidance with regard to Company quality assurance policy.</p> <p>The Chief Executive Officer has designated the Vice President Operations Pilgrim to serve as the chief Station officer responsible for the implementation of all activities associated with the safe and reliable operation of the Station. He is responsible for establishing policies, goals, and objectives; directing the functions of the safety review committees; and the adequacy of the QA Program, including its effective implementation. He is the officer to whom defects and noncompliances relating to nuclear safety hazards are to be reported and is designated as the officer responsible for notifying NRC of defects and noncompliances when required by 10 CFR Part 21.</p> <p>Executive Directors report to the Vice President Operations Pilgrim with the following divisions of responsibility:</p> <ul style="list-style-type: none"> <li>• Station operations, which include plant production, operations, maintenance, facility services, and training.</li> </ul>

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BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
	<p>New Text</p> <p>New Text</p>	<ul style="list-style-type: none"> <li>• General services, which include supply chain management, document control, records administration, and computer applications</li> <li>• Nuclear engineering and assessment, which include design and system engineering, quality assurance, regulatory relations, corrective action, and emergency preparedness</li> </ul>
<p>1.2.2 <b><u>Senior Vice President, Nuclear</u></b></p> <p><del>The Board of Directors has designated the Senior Vice President, Nuclear as the corporate officer with responsibility and authority to manage and direct the Nuclear Division. He is responsible for all activities related to the operation of PNPS and reports to the President/Chief Executive Officer. He is responsible to establish overall policies and to assure effective implementation of those policies. Boston Edison has established a Quality Assurance Program to implement the requirements in Appendix B to 10CFR Part 50, and the</del> <b>Senior Vice President, Nuclear is assigned responsibility for assuring that the program is aggressively implemented. He has delegated responsibilities and authorities to accomplish required activities according to his written policies.</b></p> <p><b>The Senior Vice President, Nuclear is designated as the officer to whom defects and noncompliances relating to nuclear safety hazards are to be reported and is designated as the officer responsible for notifying NRC of defects and noncompliances when required by 10CFR Part 21. The assignment of corporate responsibilities for implementation of 10CFR Part 21 is more fully described in Boston Edison Company's Corporate Policy Manual.</b></p> <p><b>The following report directly to the Senior Vice President, Nuclear.</b></p> <ol style="list-style-type: none"> <li><b>1. General Manager, Technical</b></li> <li><b>2. Vice President, Nuclear Operations and Station Director</b></li> <li><del>3. Quality Assurance Group Manager</del></li> <li><del>4. Nuclear Business Management Services</del></li> </ol>	<p>Type C</p> <p>Type A</p> <p>Type C</p> <p>Type A</p> <p>Type A</p> <p>Type A</p> <p>Type D</p> <p>Type C</p>	<p>← ← <b><u>Program Change</u></b></p> <p>← ← <b><u>See Change Evaluation</u></b></p>

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BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
<p>1.2.3 <u><b>Vice President, Nuclear Operations and Station Director</b></u></p> <p><b><i>The Vice President, Nuclear Operations and Station Director is responsible for all activities related to operation and maintenance of PNPS. He is responsible for establishing procedures and controls to assure that requirements of the BEQAM are effectively implemented by Groups within his organization.</i></b></p> <p><del>The Vice President, Nuclear Operations and Station Director is responsible to develop, maintain, and control interdepartmental Nuclear Organization Procedures (NOPs) in accordance with BEQAM Section 5.</del></p> <p><b><i>The following Groups report to the Vice President, Nuclear Operations and Station Director:</i></b></p> <ol style="list-style-type: none"> <li><b><i>1. Plant Group</i></b></li> <li><b><i>2. Nuclear Services Group</i></b></li> <li><b><i>3. Nuclear Training and Management Services Group</i></b></li> </ol>	<p>Type A</p> <p>Types B and C</p> <p>Type A</p>	
<p>1.2.4 <u><b>General Manager, Technical</b></u></p> <p><b><i>The General Manager, Technical is responsible for all activities related to engineering and design for PNPS, Emergency Planning, and regulatory interface. He is responsible for establishing procedures and controls to assure that requirements of the BEQAM are effectively implemented by Groups within his organization.</i></b></p> <p><b><i>The following report directly to the General Manager, Technical:</i></b></p> <ol style="list-style-type: none"> <li><b><i>1. Nuclear Engineering Services Group</i></b></li> <li><b><i>2. Regulatory Relations Group</i></b></li> </ol>	<p>Types A and B</p> <p>Types A and B</p>	
	<p>New Text</p>	<p>1.3.2 <u><b>Managers</b></u></p> <p>Station Directors serving as managers report to the Executive Directors identified above. These individuals may report through an additional layer of management, but shall maintain sufficient authority and organizational freedom to implement the</p>

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BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
<p>1.2.5 <u>Quality Assurance Group Manager</u></p> <p><b>The Senior Vice President, Nuclear has delegated authority and responsibility for directing and administering the Quality Assurance Program to the Quality Assurance Group Manager.</b> Refer to Boston Edison Company's Corporate Policy Manual. <b>Specifically, the Quality Assurance Group (BAG) is accountable for:</b></p> <ul style="list-style-type: none"> <li>• <b>Establishing, maintaining, and assuring the implementation of a Quality Assurance Program which effectively complies with 10CFR50 Appendix B, and the Nuclear Division's policies.</b></li> <li>• <b>Establishing, maintaining, and assuring the implementation of an effective audit program and corrective action and analysis program. This includes providing quarterly reports to senior management identifying adverse quality trends.</b></li> <li>• <b>Establishing, maintaining, and implementing an effective quality control function for the Nuclear Division.</b></li> <li>• <b>Assuring that operational phase activities falling within the scope of the QA Program are prescribed by and implemented according to detailed, approved procedures, and that these procedures provide effective management controls.</b></li> <li>• <b>Preparation, revision, and control of the Boston Edison Quality Assurance Manual (BEQAM), which is the primary quality assurance document.</b></li> </ul> <p>In order to implement these responsibilities, the Quality Assurance Group Manager is provided with "Stop Work" authority whereby he can suspend any quality related activity or</p>	<p>Type A</p> <p>Type C</p> <p>Type A</p> <p>Types A and B</p> <p>Type E</p>	<p>assigned responsibility. One Director has been assigned responsibility for each of the manager functions described below. A Director may have responsibility for more than one function. Within the scope of each Director's responsibility, support management staff has been assigned to ensure the effective control.</p> <ul style="list-style-type: none"> <li>• The manager responsible for quality assurance has overall authority and responsibility for establishing, controlling, and verifying the adequacy and implementation of the Quality Assurance Program as described in this Pilgrim Quality Assurance Manual (PQAM). This responsibility also includes the ASME XI In-service Inspection (ISI) Program, the evaluation and approval of suppliers, and the verification and acceptance of purchased items. The manager responsible for quality assurance has the authority, responsibility, and organizational freedom to escalate matters directly to the Vice President Operations Pilgrim.</li> </ul> <p>In order to implement these responsibilities, the manger responsible for quality assurance is provided with "stop work" authority whereby he can suspend any</p>

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BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
<p>process which may, in his opinion, adversely affect the safe operation of Pilgrim Nuclear Power Station.</p>		<p>quality-related activity or process that may, in his opinion, adversely affect the safe operation of Pilgrim Nuclear Power Station.</p>
<p>QAG personnel have sufficient authority and organizational freedom to identify quality problems; initiate, recommend, or provide solutions through designated channels; and verify implementation of solutions. (cont.)</p>	Type E	<p>Personnel performing quality assurance functions have sufficient authority and organizational freedom to identify quality problems; initiate, recommend, or provide solutions through designated channels; and verify implementation of solutions.</p>
<p><del>The QAG Manager and his subordinates communicate directly with Group Managers and responsible personnel for the identification and resolution of deficiencies.</del></p>	Type B	
<p><b><i>The QAG Manager reports directly to the Senior Vice President, Nuclear.</i></b></p>	Type D	<p>← <b><u>Reporting chain has been modified via direct report to the Executive Director responsible for engineering and assessment with the retained authority and responsibility to escalate matters directly to the Vice President Operations Pilgrim. See Change Evaluation.</u></b></p>
<p><b><i>The QAG is responsible to establish and maintain the Inservice Inspection Program required by ASME Section XI and the PNPS Technical Specifications.</i></b></p>	Type B	
	New Text	<ul style="list-style-type: none"> <li>• The manager responsible for operations assures the safe, reliable, and efficient operation of the plant within the constraints of applicable regulatory requirements and the operating license. The functional responsibilities include:               <ul style="list-style-type: none"> <li>-- operations;</li> <li>-- operation production controls;</li> <li>-- operations support, inclusive of reactor engineering and fuel procurement.</li> <li>-- chemistry</li> </ul> </li> </ul>
	New Text	<ul style="list-style-type: none"> <li>• The manager responsible for plant production assures the effective maintenance and modification of the plant. The functional responsibilities include:               <ul style="list-style-type: none"> <li>-- maintenance;</li> <li>-- modification implementation;</li> <li>-- outage and project management</li> <li>-- integrated scheduling &amp; risk management</li> <li>-- maintenance programs</li> </ul> </li> </ul>
	New Text	<ul style="list-style-type: none"> <li>• The manager responsible for asset management administers engineering services. Functional responsibility includes design engineering, system engineering, safety analyses and evaluations, and the In-service Testing (IST) Program.</li> </ul>

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BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
	<p>New Text</p>	<ul style="list-style-type: none"> <li>• The manager responsible for nuclear services administers radiological protection and waste processing.</li> <li>• The manager responsible for supply chain management administers the materials and component engineering and the purchasing of items and services that support Station operations and comply with Quality Assurance Program requirements.</li> <li>• The manager responsible for training provides for the training and certification of operating personnel as well as the technical training of plant support personnel.</li> <li>• The manager responsible for records administration and procedures provides direction, control, and overall supervision of the records management and document control systems.</li> <li>• The manager responsible for the Corrective Action Program provides direction, control, and overall supervision of the corrective action process.</li> <li>• The manager responsible for emergency preparedness provides direction, control and overall supervision of the PNPS Emergency Plan.</li> <li>• The manager responsible for regulatory relations provides for the effective administration of the plant license, Technical Specifications, and the Updated Final Safety Analysis Report (UFSAR), as well as the coordination of the Station organization's response to industry and regulatory issues.</li> </ul>
<p><b>1.2.6 <u>Quality-related Responsibilities Common to All Group Managers, General Managers, and Vice Presidents</u></b></p> <p><b><i>Each of the Group Managers, General Managers, and Vice Presidents identified have certain quality-related responsibilities in common, as follows:</i></b></p> <ul style="list-style-type: none"> <li>• <b><i>Provide and implement policies and procedures for all quality-related</i></b></li> </ul>	<p>Type B</p> <p>Type B</p>	<p><b>1.4 <u>AUTHORITY AND RESPONSIBILITY</u></b></p> <p>ENGCC personnel have responsibility for the scope and implementation of an effective Quality Assurance Program. ENGCC personnel may delegate all or part of the activities of planning, establishing, and implementing the Quality Assurance Program to others, but responsibility for the Program's</p>

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BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
<p><i>activities which fulfill the requirements of this manual.</i></p> <ul style="list-style-type: none"> <li>• <b>Choose qualified, competent personnel to maintain a staff adequate to perform all quality-related activities. Assure that personnel are indoctrinated in the Boston Edison Quality Assurance Program for PNPS and in other management controls and are adequately trained to perform assigned activities, including proficiency in the use of department procedures. Coordinate training with the Nuclear Training and Management Services Group. Evaluate the performance of personnel and take required actions.</b></li> <li>• <b>Provide the means and conditions (e.g., facilities, tools, supplies, etc.) to allow personnel to carry out quality-related activities within the constraints of corporate budget controls.</b></li> <li>• <b>Ensure coordination of activities across the interfaces with other Groups and organizations.</b></li> <li>• <del>Be cognizant and maintain Group awareness of applicable regulatory requirements, as well as BECo commitments and related industry codes and standards.</del></li> <li>• <del>Recognize, obtain, evaluate, and act upon feedback information, from internal and external sources, to improve management controls and personnel performance. Apprise upper management of activities and potential and actual problems. Communicate and resolve problems with other Groups. Take corrective action when it is warranted, including measures to prevent problem recurrence.</del></li> </ul> <p><b>The functional roles and responsibilities of the Nuclear Division organizational units that implement the QA program are more fully described in the Nuclear Organization Procedures, Group and Department Procedures, or charters approved by appropriate levels of management.</b></p>	<p>Type B</p> <p>Type B</p> <p>Type B</p> <p>Type B</p> <p>Type B</p> <p>Type B</p>	<p>effectiveness is retained by ENGC.</p> <p>ENGC personnel ensure the applicable portions of the Program are documented and approved and that personnel are trained with resources available before an activity within the scope of the Pilgrim QA Program is undertaken. The manager responsible for the applicable quality function approves procedures that implement the Program. These procedures are to reflect the Program and work is to be accomplished in accordance with the procedures.</p> <p>Individual managers are to ensure that personnel working under their cognizance are provided the necessary training and resources to accomplish their assigned tasks. These managers coordinate activities and problem resolution through appropriate interface with affected groups and institute remedial action to correct and preclude unsatisfactory conditions.</p>

BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
<p><b>1.2.9 <u>Nuclear Training and Management Services Group</u></b></p> <p><i>The Nuclear Training and Management Services Group is responsible to establish and coordinate implementation of designated training programs to support the safe and effective operation of the PNPS. The implementation of this responsibility is through the Operations Training and the Technical Training Departments. Training responsibilities assigned to other managers are supported within the framework established by these programs. The Group is also responsible for the Records, Administration, and Procedures Department.</i></p>	Types A and B	
<p><b>1.2.10 <u>Regulatory Relations Group</u></b></p> <p><i>The Regulatory Relations Group is responsible for the management of the development and maintenance of the PNPS Emergency Preparedness programs that ensure the health and safety of Station personnel and the General Public are adequately protected. The implementation of this responsibility is through the Emergency Preparedness Department. The Regulatory Affairs Department is responsible for all regulatory interface activities, including the maintenance and control of the Facility Operating License and the PNPS Final Safety Analysis Report.</i></p>	Types A and B	
<p><b>1.2.11 <u>Nuclear Engineering Services Group</u></b></p> <p><i>The Nuclear Engineering Services Group (NESG) is responsible for engineering and design activities and construction associated with plant design changes and modifications, including safety evaluations required by 10CFR50.59. It is also responsible for all engineering evaluations (e.g., studies, analyses, reviews) to support PNPS operation, maintenance, and refueling. These responsibilities include establishment and maintenance of a system to incorporate approved design changes into engineering documents. The Group is also responsible for nuclear fuel procurement and the activities of materials</i></p>	Types A and B	

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BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
<p><i>and component engineering.</i></p> <p><i>The NESG is responsible for the Inservice Test Program required by ASME Section XI and the PNPS Technical Specifications.</i></p>		
<p><u>1.2.12 Corporate Services Division: Planning and Acquisition Department</u></p> <p>The Corporate Services Division, Planning and Acquisition Department is responsible to coordinate procurement of items and services required for PNPS including approval of commercial conditions associated with procurement activities. The Department is also responsible to coordinate preparation and/or approval of purchase requests for material based on approved preliminary procurement documents.</p> <p>The Department is not authorized to change technical and quality assurance requirements specified by any Nuclear Group requesting procurement action. The Department is responsible to implement procedural controls according to requirements established in the BEQAM.</p>	<p>Type C</p> <p>Type C</p>	
<p><u>1.2.13 Corporate Services Division: Distribution and Warehousing Department</u></p> <p>The Corporate Services Division, Distribution and Warehousing Department is responsible to receive, store, and control purchased material before it is released to PNPS. The Department is also responsible to process claims at receipt.</p> <p>The Distribution and Warehousing Department is not authorized to change technical and quality assurance requirements specified by any Nuclear Group requesting the procurement action. The Department is responsible to implement procedural controls according to requirements established in the BEQAM.</p>	<p>Type C</p> <p>Type C</p>	
<p><u>1.2.14 Corporate Services Division: Field Engineering Department</u></p> <p>The Field Engineering Department is responsible to direct and coordinate the activities within the Department for general</p>	<p>Type C</p>	

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BEQAM Section 1	BEQAM Text Disposition	PQAM Section 1
testing and calibration services and to implement the requirements of the BEQAM related thereto.		

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**PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)**

**ATTACHMENT 2**

**To**

**QA PROGRAM CHANGE EVALUATION**

**CHANGE REQUEST NO. 00-01**

**For**

**SECTION 1**

**Revision 0**

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## STANDARD REVIEW PLAN 17.3 EVALUATION CHECKLIST

SRP Para.	Attribute	PQAM Section 1 Coverage
A.2.a	The program describes the organization in a manner that addresses organizational structure (including off-site and on-site organizational elements) functional responsibilities, levels of authority, and interfaces.	SAT
A.2.b	Independence has been established between persons and organizations executing performance activities and those executing verification and self-assessment activities.	SAT
A.2.c	The most senior level management position is responsible for implementing the QA Policy and Program	SAT
A.2.d	The management position responsible for executing the self-assessment function, including independent review group activities, audits, and other independent assessments: <ul style="list-style-type: none"> <li>• Has sufficient authority and organizational freedom.</li> <li>• Reports to a management level which ensures that cost and schedule considerations do not unduly influence decision-making,</li> <li>• Has effective lines of communication with other senior management positions.</li> <li>• Has no unrelated duties or responsibilities that would preclude full attention to assigned responsibilities</li> </ul>	SAT
A.2.e	Major delegation of work to participants outside the licensee's organization is identified and described.	SAT Deferred to Revision of Sections 4 and 7
A.3.a	Responsibility for the scope and implementation of an effective overall QA Program is retained by the organization.	SAT
A.3.b	The organization retains responsibility for the effectiveness of delegated activities.	SAT
A.3.c	Senior level management assesses the adequacy and effectiveness of the QA Program annually.	SAT Deferred to Revision of Section 2
A.3.d	Applicable portions of the QA Program are properly documented, approved, and implemented (personnel are trained and resources available) before an activity within the scope of the QA Program is implemented.	SAT
A.3.e	Individual managers ensure that personnel working under their cognizance are provided the necessary training and resources to accomplish their assigned task.	SAT
A.3.f	The manager responsible for their implementation approves the procedures, which reflect QA Policy, and work is accomplished in accordance with them.	SAT
A.4.a	The delegation of responsibility for executing the QA Program includes sufficient authority to accomplish the assigned task.	SAT
A.4.b	Responsibility and authority to stop unsatisfactory work is assigned such that cost and schedule considerations do not override safety considerations.	SAT

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ATTACHMENT B

Annual Report of PQAM Changes



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*Pilgrim Nuclear Power Station*

**PILGRIM QUALITY ASSURANCE MANUAL (PQAM)  
SECTION 4**

**PROCUREMENT DOCUMENT CONTROL**

Rev. 0  
Effective Date: 04/14/00

# ***PROCUREMENT DOCUMENT CONTROL***

## **4.1 PURPOSE**

This Section of the Pilgrim Quality Assurance Manual (PQAM) establishes the system to ensure purchased items and services are of acceptable quality through the specification of appropriate technical and quality assurance requirements in procurement documents.

## **4.2 GENERAL REQUIREMENTS**

Procurement controls ensure applicable quality, technical, regulatory, administrative, and reporting requirements (e.g., specifications, codes, standards, tests, inspections, special processes, and 10CFR21) necessary to assure adequate quality are invoked in procurement documents.

The procurement of services and components, including spare and replacement parts, is subject to quality and technical requirements suitable for their intended service.

Controls for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt, and quality evaluation of commercial grade items are imposed to ensure the item will perform satisfactorily in service.

These measures include provisions for the evaluation of prospective sources, the selection of only qualified suppliers, and the assurance that qualified suppliers continue to provide acceptable products and services. The program addresses all phases of procurement and in conjunction with the measures established in PQAM Section 7, includes controls to verify the quality of purchased items and services at intervals and to a depth consistent with the importance to safety, complexity, quantity, and frequency of the procurement.

Additional details concerning procurement control may be found in the Regulatory Guides and associated standards as committed to in PQAM Section 2 (e.g., Regulatory Guides 1.33, 1.123, and 1.144).



**PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)**

**CHANGE REQUEST NO. 00-02**

SECTION 4 REV. NO. 0 PARAGRAPH NO. All PAGE NO. All

REVISION (exact wording)

This section has been rewritten in its entirety; therefore, no mark-up of Revision 24 is provided and no revision bars are included in Revision 0. See Attachment 1 for information relative to the existing text, the disposition of this text, and the revised wording.

PURPOSE OF REVISION

1. To transfer responsibilities for the adequacy of procurement QA requirements specified in specifications, technical evaluations, and purchase orders from Quality Assurance (QA) to the Supply Chain Management (SCM) organization.
2. To address the change from annual supplier evaluations to an ongoing performance evaluation process that has occurred due to the delegation of the supplier QA control function to the Entergy Material Requirements group headquartered in Jackson, Mississippi.
3. Complete rewrite to reformat text and provide a level of discussion consistent with the Entergy QA Manual applied to the regulated side of the Company.

*Richard G. Yarnell* 1/28/00  
 ORIGINATOR Date

4/14/00  
 EFFECTIVE DATE

**APPROVAL SIGNATURES**

*MA Blay* 3/16/00  
 VICE PRESIDENT, OPERATIONS PILGRIM Date

*D. Sullivan* 3/27/00  
 VICE PRESIDENT, STATION DIRECTOR Date

*A. J. O'Brien* 2/22/00  
 DIRECTOR, DESIGN ENGINEERING Date

*[Signature]* 2/2/00  
 DIRECTOR, NUCLEAR ASSESSMENT Date

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# QA PROGRAM CHANGE EVALUATION

PQAM Change Request No. 00-02

Section No. 4

Rev. 0

## EVALUATION

Does the above change to the QA Program reduce the commitments concerning:

Yes No

- 10CFR50, Appendix B
- Program coverage documentation (policies, procedures, or inspections)
- Policy, procedure, or instruction compliance
- Identification of structure systems, and components
- Identification of major participating organizations and their designated functions
- Providing control over activities affecting the quality of the identified structures, systems, and components
- Controlling conditions under which activities affecting quality are to be accomplished (e.g., equipment, environmental conditions, prerequisites)
- Attaining required quality (e.g., special controls, processes, test equipment, tools, or skills)
- Verification of quality by inspection and test
- Providing indoctrination and training of personnel performing activities affecting quality
- Regularly reviewing the status and adequacy of the QA Program
- Periodic review for status and adequacy by participating organization Managers of the part of the QA Program which they are executing
- Other (explain) -- none --

## QA PROGRAM CHANGE EVALUATION (cont.)

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PQAM Change Request No. 00-02

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### CONCLUSION

Section 4 of the Pilgrim Quality Assurance Program, as revised, continues to satisfy 10CFR50, Appendix B. The changes made within this section meet the criteria within 10CFR50.54(a) as clarified by Direct Final Rule 64FR9029 relative to QA program changes that can be made without prior NRC approval.

Under these regulations, the general changes made to rewrite this section using an SRP 17.3 format are allowed to be made without NRC approval. The two specific program changes, which are reductions in commitment, can also be made without prior NRC approval. These changes are acceptable based on the evaluated application of a previous and similar program change made by other utilities that has been approved by the NRC and documented in Safety Evaluation Reports.

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### CHANGE EVALUATION

This revision to Section 4 is the second in a series of program changes which will rewrite the entire program under an SRP 17.3 format that describes the QA Program in a manner consistent with the level of detail prescribed in the Entergy QA Program applied to the regulated plants. The completed document will serve as a model for other nuclear plant acquisitions by ENGCO, which will yield a common quality assurance philosophy, methodology, and commitment within the corporation and maximize potential for shared resource applications among the Entergy family of operating nuclear units.

It is important to note that a QA Program written to an SRP 17.3 format is significantly different than one written under an SRP 17.1 or SRP 17.2 format. SRP 17.3 addresses QA Program review attributes that cumulatively address Criterion 4, "Procurement Document Control," and Criterion 7, "Control of Purchased Material, Equipment, and Services," of 10CFR50, Appendix B. SRP 17.1 and SRP 17.2 address Criteria 4 and 7 individually, requiring a higher level of detail in QA Program descriptions addressing these criteria. SRP 17.1 and SRP 17.2 are the documents used by the NRC to review and accept previous editions of the Pilgrim QA Program.

In order to reflect the new ownership, the revised organizational structure, and the realignment of responsibilities in effect after the transfer of the Station's operating license to Entergy Nuclear Generation Company (ENGCO), a complete rewrite of

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Section 4 to the Pilgrim Quality Assurance Manual (PQAM) has been prepared. The revision involves the general rewriting of text in an SRP 17.3 format, as well as two specific program changes. The evaluation and disposition of these changes are as follows.

### General Change

From a general perspective, this revision describes Pilgrim procurement document control measures with a minimal level of detail that effectively addresses the review criteria of SRP 17.3 and reflects the organizational structure and realignment of functional responsibilities that resulted from the sale of the Station to Entergy. While much of the detailed text in the previous revision has been deleted, the level of detail provided in this revision effectively addresses the requirements of Criterion 4 of 10CFR50, Appendix B.

The detailed evaluations of the changes made are documented in Attachments 1 and 2 to this evaluation. Attachment 1 provides a verbatim copy of the previous Section 4 in a matrix form that identifies the disposition of text as compared to the associated wording contained in the new revision. The disposition of text falls within five categories:

- Type A: Text where a specific change in QA requirements, commitments or processes has occurred. These changes require a more detailed evaluation to ensure their acceptability.
- Type B: Deleted text relative to system implementation that is redundant to text already and more appropriately contained in implementing procedures. The procedures addressing the deleted text are identified.
- Type C: Text relative to Criterion 4 of 10CFR50, Appendix B that has been abbreviated to address the content in a manner consistent with the new format and level of detail in the Entergy QA Program used at the other regulated plants.
- Type D: Deleted text not essential to the area of discussion under the revised format.
- Type E: Text relative to Criterion 4 of 10CFR50, Appendix B adopted as written.

The general changes evaluated are those identified as Types B, C, D, and E. Type A changes are specific changes to PQAM requirements, commitments, and processes requiring a more detailed evaluation.

Attachment 2 documents the evaluation of the revised Section 4 relative to the criteria of SRP 17.3. These comparisons ensure all program elements and attributes within the SRP have either been addressed in the revised text or identified and deferred for action during subsequent revisions to other PQAM sections.

Notwithstanding the two Type A changes identified that are evaluated as specific changes in the following section to this evaluation, the balance of changes (Types B through E) are concluded to be acceptable. These changes have no adverse program effect and provide a level of detail responsive to SRP 17.3 QA Program review criteria as well as the requirements of Criterion 4 to 10CFR50, Appendix B. Additionally, under 10CFR50.54(a) and Direct Final Rule 64FR9029, the general

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changes made to rewrite this section are allowed to be made without NRC approval.

### Specific Changes

This revision involves two specific changes pertaining to changes in QA requirements, commitments, or processes. The transfer of responsibility for the adequacy of quality assurance requirements in procurement documents from the QA organization to the Supply Chain Management (SCM) group and a process change relative to the supplier performance evaluation process. As a result of delegating the supplier QA control function to the Entergy Material Requirements group, PQAM specified annual evaluations of supplier performance will now be performed using an ongoing evaluation process utilized by the Entergy Material Requirements group.

While the change relative to the transfer of responsibility for the adequacy of QA requirements in procurement documents is determined to be within the allowances of 10CFR50 Appendix B and compliant with the Station's existing commitments to Regulatory Guides and associated ANSI Standards, it is considered to be a reduction in QA Program commitments since the level of organizational independence of the personnel performing the function has been reduced. Additionally, while the change in the supplier performance evaluation process is also within the allowances of 10CFR50, Appendix B, it involves a deviation from the Station's commitments to Regulatory Guide 1.144. Consequently, this change is also considered to be a reduction in QA Program commitments.

Under 10CFR50.54(a) as clarified by Direct Final Rule 64 FR9029, changes that reduce QA Program commitments can be made without prior NRC approval provided the following conditions apply:

- The type of change being made has been addressed previously by another licensee, with NRC approval obtained through a Safety Evaluation Report.
- The licensee making the change has evaluated the bases of the prior NRC approval and determined the bases to be acceptable for application toward the change being made.

The two reductions in commitment in this revision to Section 4 represent QA Program changes that have been addressed previously by other utilities and approved by the NRC. The evaluation as to the bases for these changes, the associated NRC approval, and acceptability for application to Pilgrim Station without prior NRC approval follows.

The change relative to the transfer of responsibility for the adequacy of QA requirements in procurement documents from QA to the SCM organization is a reduction in commitment previously addressed by the Washington Public Power Supply System (WPPSS) in 1998. Revision 29 to the WPPSS Operational Quality Assurance Program Description was submitted to the NRC and included the transfer of responsibility for the adequacy of QA requirements in procurement documents from the QA organization to responsible procurement personnel independent of the procurement document that has been prepared. The NRC, as documented in the Safety Evaluation Report (SER) dated December 21, 1998, accepted this change. The revision was accepted on the basis that the program requires:

- The manager of the procurement organization to be responsible to ensure personnel performing this function are appropriately indoctrinated and trained.

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- The review by procurement personnel to include verification that quality requirements are correctly stated, that they can be inspected and controlled, and that the vendor is on the listing of evaluated vendors.
- The procurement personnel performing the review to have an avenue to report problems to the Manager, Quality through the Corrective Action Program.
- The involvement of the QA organization through review of procurement documents on a sampling basis.

The evaluation of the PQAM Section 4 revision has determined that the proposed change in conjunction with control measures established in other PQAM sections consistently address the NRC's approval bases defined in the SER.

- Section 1 of the PQAM requires responsible managers to ensure personnel performing activities controlled by the PQAM are appropriately indoctrinated and trained prior to executing the activity.
- The revision to Section 4 establishes measures to ensure technical and quality requirements appropriate to the application of the item or service are specified in procurement documents. In line with program requirements to have procedures that comply with ANSI N45.2.13, associated SCM procedures are to be revised to address the review of procurement documents. These procedures are to ensure that quality requirements are correctly stated, that they can be inspected and controlled, and that the vendor is on the listing of evaluated vendors.
- Under PQAM Section 16, procurement personnel performing the review have an avenue to report problems using the Problem Report system. The Director of Nuclear Assessment who serves as the manager responsible for QA is also responsible for the Corrective Action Program.
- Under PQAM Section 18, the QA organization performs audits and surveillances that are to include the adequacy and effectiveness of the revised procurement document review process. During these oversight activities, samples of procurement documents will be reviewed to ensure quality requirements are appropriately specified.

Accordingly, it is acceptable to apply this SER toward the acceptability of the PQAM Section 4 change without requiring prior NRC approval.

The change to the supplier performance evaluation process also represents a reduction in commitment via PQAM Section 2 commitments to Regulatory Guide 1.144 without exceptions or alternatives. This Regulatory Guide requires an annual evaluation while the supplier QA control function to be delegated to the Entergy Material Requirements group utilizes an ongoing evaluation process. While the change to an ongoing evaluation process is a suitable alternative, it represents a reduction in previous QA Program commitments.

Entergy previously addressed this change in 1977 for the Grand Gulf Nuclear Power Station. Revision 15 to the Entergy Grand Gulf Nuclear Station QA Manual was submitted to the NRC and approved as documented in the associated Safety Evaluation Report dated November 18, 1997. Under the sale of Pilgrim to Entergy, the Entergy Material Requirements group is to perform the supplier QA control function for Grand Gulf and Pilgrim Station utilizing the same implementing

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procedures. On this basis, it is acceptable to apply this SER toward the acceptability of the PQAM Section 4 change without requiring prior NRC approval.

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Prepared by: Richard Bennett 1/28/00  
Cognizant QA Engineer Date

Approved by: R. S. Sheridan 2/7/00  
Superintendent, Nuclear (QA) Date

W. H. [Signature] 2/4/00  
Manager, Team (QA Assessment) Date

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**PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)**

**ATTACHMENT 1**

**To**

**QA PROGRAM CHANGE EVALUATION**

**CHANGE REQUEST NO. 00-02**

**For**

**SECTION 4**

**Revision 0**

8307 1057

## TEXT DISPOSITION CATEGORIES

Type A = Specific change--text revised or deleted reflective of a QA Program requirement, commitment, or process change.

Type B = Text relative to system implementation which has been deleted as redundant to text already delineated and more appropriately contained in implementing procedures.

Type C = Text revised to reflect the new ownership, the revised organization, or the resultant realignment of responsibilities or abbreviated to address the content in a manner consistent with the level of discussion under the new format.

Type D = Text not essential to area of discussion under the revised format.

Type E = Text adopted virtually as written.

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BEQAM Section 4	BEQAM Text Disposition	PQAM Section 4
<p><b>PROCUREMENT DOCUMENT CONTROL</b></p> <p>4.1 <u>PURPOSE</u></p> <p>This section establishes the requirements for preparation, review, approval and control of procurement documents for Q items and Q services to assure applicable technical requirements and quality assurance requirements are included and that</p> <p><del>spare or replacement parts are subject to controls at least equivalent to those used for the original equipment.</del></p> <p><del>The definition of Q items and Q services is described in the BEQAM, Section 2, Paragraph 2.4.</del></p>	<p>Type C PQAM Section 4.1</p> <p>Types B &amp; C PQAM Section 4.2 4<sup>th</sup> para. and SCM B1-1</p> <p>Type D</p>	<p><b>PROCUREMENT DOCUMENT CONTROL</b></p> <p>4.1 <u>PURPOSE</u></p> <p>This Section of the Pilgrim Quality Assurance Manual (PQAM) establishes the system to ensure purchased items and services are of acceptable quality through the specification of appropriate technical and quality assurance requirements in procurement documents.</p>
<p>4.2 <u>GENERAL REQUIREMENTS</u></p> <p>Procurement documents (i.e., BECo Purchase Orders and accompanying documents) issued to suppliers specify the appropriate technical and quality assurance requirements to be met by the suppliers for the items and services procured.</p> <p><del>The Materials &amp; Component Engineering Division (M&amp;CED) prepares and processes preliminary procurement documents to obtain necessary approvals and includes all the technical and quality assurance requirements explicitly or by reference. The requirements specified for Q items and services are based on approved plant design documents, engineering evaluations, supplier evaluations, and BECo QAD quality assurance activities</del></p> <p><del>The Quality Assurance Department (QAD) is responsible to ensure the appropriate quality assurance requirements have been included.</del></p>	<p>Type C PQAM Sect. 4.2 1<sup>st</sup> para.</p> <p>Type B NE 4.01, 115.1; SCM- B1-1, 115.0 and 6.0; SCM-B2-1, SCM-B4-1, and SCM- C1-1; QA4.09 (NOTE: QA4.09 is scheduled to be retired.)</p> <p>Type A Reduced Commitment; SER; See Evaluation.</p>	<p>4.2 <u>GENERAL REQUIREMENTS</u></p> <p>Procurement controls ensure applicable quality, technical, regulatory, administrative, and reporting requirements (e.g. specifications, codes, standards, tests, inspections, special processes, and 10CFR21) necessary to assure adequate quality are invoked in procurement documents</p> <p>The procurement of services and components, including spare and replacement parts, is subject to quality and technical requirements suitable for their intended service.</p>

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BEQAM Section 4	BEQAM Text Disposition	PQAM Section 4
<p>For Q items which will replace existing items installed in the plant, the technical requirements are the same as specified in approved design documents for the existing item, or different technical requirements are justified by approved engineering evaluations that include review for suitability of application of the new items.</p>	<p>Types B &amp; D SCM B1-1 and NE4.01</p>	
<p>For new items to be installed according to a Plant Design Change (PDC) or a Temporary Modification (TM), the technical requirements are as specified in the approved PDC or TM.</p>	<p>Type B NESG 3.20, PNPS 1.7.2, and SCM- B1-1, B2-1, B4-1, C1-1</p>	
<p>if a Q item is determined to be a commercial grade item, as defined by 10CFR21, the M&amp;CED performs an engineering evaluation to determine which technical requirements are critical performance characteristics of the item.</p> <p>In some cases, such as a new item to be installed via a PDC, NED may perform this evaluation. The evaluation is then used by M&amp;CED to specify the technical and quality assurance requirements</p> <p>and by QAD to identify additional quality assurance activities by BECo.</p>	<p>Types B &amp; C PQAM Sect. 4.2, 3<sup>rd</sup> para.</p> <p>Type B NESG 4.01 and 4.05 SCM-B1-1, B2-1, B4-1, and C1-1</p> <p>Type A Reduced Commitment; SER; See Evaluation.</p>	<p>Controls for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt, and quality evaluation of commercial grade items are imposed to ensure the item will perform satisfactorily in service</p>
<p>For all other Q items, termed nuclear grade, and all Q services, the QAD includes any quality assurance requirements specified in approved design documents.</p> <p>Based on supplier evaluation per Section 7, additional quality assurance requirements are specified and additional BECo QAD quality assurance activities are identified to ensure suppliers meet the applicable requirements of 10CFR50, Appendix B and the BEQAM.</p>	<p>Type A Reduced Commitment SER See Evaluation</p> <p>Type C PQAM Section 4.2, 1<sup>st</sup>, 2<sup>nd</sup>, and 4<sup>th</sup> para.</p>	<p>These measures include provisions for the evaluation of prospective sources, the selection of only qualified suppliers and the assurance that qualified suppliers continue to provide acceptable products and services. The program addresses all phases of procurement and in conjunction with the measures established in PQAM Section 7, includes controls to verify the quality of purchased items and services at intervals and to a depth</p>

BEQAM Section 4	BEQAM Text Disposition	PQAM Section 4
		consistent with the importance to safety, complexity, quantity and frequency of the procurement.
<p><u>4.3 PRELIMINARY PROCUREMENT DOCUMENTS</u></p> <p>4.3.1 Preliminary procurement documents specify when quality category Q applies and identify any other specific or special requirements; in particular, suppliers are required to provide storage level, shelf life, and storage maintenance requirements. Additional information provided includes, as appropriate:</p> <ul style="list-style-type: none"> <li>— a. Applicable specifications and drawings</li> <li>— b. Regulatory requirements</li> <li>— c. Component identification requirements</li> <li>— d. Applicable codes and standards</li> <li>— e. Test and inspection requirements</li> <li>— f. Documentation requirements (see Paragraph 4.3.3)</li> <li>— g. Special packaging, shipping, and handling requirements</li> </ul> <p>Preliminary procurement documents require the supplier to incorporate applicable quality assurance requirements into procurement documents issued to the supplier's sub-tier suppliers.</p>	<p>Type B NESG 4.01, ¶4.0; PNPS 1.7.2; SCM-B1-1, B2-1, B4-1, and C1-1</p>	<p>Procurement controls are prescribed in implementing procedures that are consistent with applicable Regulatory Guides and associated standards as committed to in PQAM Section 2 (e.g., Regulatory Guides 1.33, 1.123, and 1.144).</p>
<p>Preliminary procurement documents provide for BECo access to the supplier's plant facilities and records for inspection or audit by BECo and its authorized representatives. BECo preliminary procurement documents require that the supplier's procurement documents to sub-tier suppliers allow access also to sub-tier suppliers as and when deemed necessary by BECo.</p> <p>Preliminary procurement documents require that nonconformances to procurement requirements or BECo-approved supplier documents, identified by the supplier or by BECo source/surveillance inspection, and consisting of one or more of the following, must be submitted with technical justification to BECo for approval of the supplier's recommended dispositions (as provided for in Section 15):</p>	<p>Type B SCM B2-1, SCM B4-1, and NE4.01</p> <p>Types B and D SCM-B4-1, Quality Clause 04 invokes this requirement in the PO. SCM-B1-1, ¶2.5, SCM-B2-1, and</p>	

BEQAM Section 4	BEQAM Text Disposition	PQAM Section 4
<p><del>1. Technical or material requirements are violated.</del></p> <p><del>2. Supplier documents approved by BECo are violated.</del></p> <p><del>3. Nonconformance cannot be corrected by continuation of the original manufacturing process or by rework.</del></p> <p><del>4. The item does not conform to the original requirements even though it can be restored to a condition in which its capability to function is unimpaired.</del></p> <p><del>BECo must approve the dispositions before the affected item is accepted.</del></p>	<p>SCM-C1-1; NESG 16.01</p>	
<p>1062 7 307 9</p> <p>4.3.2 Certain items, designated commercial grade items (CGIs), may be procured from a supplier and used in "Q" applications at PNPS based on an engineering evaluation and acceptance of the item for the application. The M&amp;CED (or NED) evaluates each candidate item and justifies the conclusion that, based on identification and verification of an item's critical performance characteristics, BECo has reasonable assurance the item will perform its function in use.</p> <p>The M&amp;CED (or NED) identifies the item's application(s) and critical performance characteristics. The M&amp;CED provides test/inspection/survey requirements including acceptance criteria. The methods of acceptance for commercial grade items are: special tests or inspections, commercial grade survey of the supplier, or source verification, or a combination of these.</p> <p>The detailed requirements are reviewed by QAD to assure BECo acceptance method and criteria provide reasonable assurance of verifying the item's critical performance characteristics and to permit planning for QAD participation in accepting the item.</p> <p>In general, the QAD evaluation precedes, and is incorporated by reference in, the preliminary procurement document for the item. It is also permissible to upgrade an item which was procured non-Q, if the item satisfies the criteria as a commercial grade item. In such cases, the evaluation and QAD ac-</p>	<p>Type C PQAM Sect. 4.2, 3<sup>rd</sup> para.</p> <p>Type B SCM-B1-1, Para.6.2, B2-1, B4-1, and C1-1; NESG 4.01, 115.2, and 4.05</p> <p>Type A Reduced Commitment; SER; See Evaluation</p> <p>Type B NESG 4.05 Para. 1.2</p>	

BEQAM Section 4	BEQAM Text Disposition	PQAM Section 4
<p>acceptance of the item is performed before the item is released from the warehouse.</p> <p style="text-align: center;"><b><u>NOTE</u></b></p> <p>It is also acceptable to upgrade a non-Q item via the nonconformance disposition process, per Section 15. The disposition shall be completed before the item is released from the warehouse.</p> <p>Items which have been evaluated are identified in individual Commercial Grade Item (CGI) Evaluations and in Specification M-547, "Lubricants and Diesel Fuel Oil for Safety Related Applications."</p>	<p>Types B &amp; D NESG 4.05 (Note: QA4.10 is scheduled to be retired.)</p> <p>Types B &amp; D</p>	
<p><del>4.3.3 The M&amp;CED identifies any documentation required to be submitted by the supplier, including documentation to be submitted to BECo for review and approval and documentation to be submitted for acceptance of the items or service. Required documentation also includes installation, operating, and maintenance manuals, including preventive maintenance instructions, and documents to be provided to BECo for records retention purposes.</del></p> <p><del>For nuclear grade items and Q services, supplier documentation for acceptance may be a Certificate of Conformance, unless requirements of the applicable codes and standards preclude this option (i.e., more specific documentation is called for). If a Certificate of Conformance is required, the procurement documents also specify that the Certificate of Conformance must meet the requirements given in Exhibit II-4-1.</del></p> <p><del>In addition, the QAD determines if additional documentation is required from the supplier to support the Certificate of Conformance, and identifies any such documentation in the procurement documents.</del></p>	<p>Type B NESG 4.02; SCM-B1-1 and SCM-B4-1</p> <p>Type B NESG 4.02; SCM-B1-1, SCM-B2-1, and SCM-B4-1</p> <p>Type A Reduced Commitment; SER; See Evaluation</p>	
<p>4.3.3.1 If the preliminary procurement document requires the supplier to submit a Certificate of Conformance and BECo QAD does not perform a source inspection (off-site) or a surveillance inspection (on-site), or audit the supplier, then the QAD identifies acceptance inspections and/or tests by which</p>	<p>Type B NESG 4.05, SCM-B1-1, B2-1, B4-1, and C1-1. (Note: Revised</p>	

BEQAM Section 4	BEQAM Text Disposition	PQAM Section 4
<p><del>BECo will verify the validity of the supplier's certificate and the effectiveness of the certification process.</del></p>	<p>NESGs and SCMs shall address when unapproved suppliers are selected and the application of additional QA requirements based on Procurement scenario and supplier approval status.)</p>	
<p>1064 4.3.4 <del>Preliminary procurement documents are reviewed by the QAD to ensure proper identification of items and inclusion of appropriate technical and quality assurance requirements for items and services being procured. This review verifies the quality category and the completeness of the requirements.</del></p>	<p>Type A Reduced Commitment; SER; See Evaluation</p>	
<p>7 4.3.5 <del>The Preliminary procurement documents for spare or replacement parts are subject to controls at least equivalent to those applied for original equipment.</del></p>	<p>Type B NE4.01 and SCM B1-1</p>	
<p>309 4.4 <u>SUPPLIER EVALUATION AND SELECTION</u></p> <p>Supplier evaluation and selection is an integrated action which involves Nuclear Organization Departments, Purchasing, M&amp;CED, and the QAD. This cooperative effort ensures that items and services are purchased from qualified suppliers, i.e., suppliers capable to provide items and services which meet technical, quality assurance, and commercial requirements.</p> <p>The QAD is responsible to determine the capability of the selected supplier to meet the technical requirements and any imposed quality assurance requirements, per Section 7.</p>	<p>Type C PQAM Section 4.2, 3<sup>rd</sup> and 4<sup>th</sup> para.</p> <p>Type B EMR MRPs 7.02 / 7.04 / 7.06 / 18.04 18.09 (Note: QA 4.09, ¶6.0 defines this process and</p>	

BEQAM Section 4	BEQAM Text Disposition	PQAM Section 4
	is to be re-tired.)	
<p><u>4.5 PURCHASE ORDERS/CONTRACTS</u></p> <p>—The Purchasing Department issues procurement documents (Purchase Order and accompanying documents) according to corporate policies and procedures. Purchase Orders contain all the technical and quality assurance requirements specified and approved by the Nuclear Organization. When supplier evaluation per Section 7 is required, Purchase Orders are issued to suppliers approved by the Nuclear Organization for the items and services specified. Any additions, deletions, or changes to the technical and quality assurance requirements of the issued Purchase Order are subject to the same review and approval as the original, preliminary procurement documents; revision to commercial requirements need only be approved by the Purchasing Department and by management as required by corporate policies and procedures.</p> <p>The Purchasing Department may transmit procurement requirements to a supplier in advance of the procurement documents only after all required approvals of the preliminary procurement documents are obtained.</p>	<p>Type B NESG 4.01; SCM-B1-1, ¶5, SCM-B2-1, SCM B4-1, and SCM-C1-1</p> <p>Type B NESG 4.01; SCM-B1-1, ¶5, SCM-B2-1, SCM B4-1, and SCM-C1-1</p>	
<p><u>4.6 DEVIATION REQUESTS FROM BECo PURCHASE ORDER/CONTRACT REQUIREMENTS</u></p> <p>—When a supplier reports a deviation* from the technical or quality assurance requirements of the BECo Purchase Order, the Purchasing Department or other recipient transmits this information to the M&amp;CED for resolution. Upon resolution, M&amp;CED initiates revised preliminary procurement documents, subject to the same review and approvals as the original documents, which result in a revised Purchase Order issued by the Purchasing Department.</p> <p>*A "deviation" may be:</p> <p>—1. An exception to or modification of BECo's requirements proposed by the supplier at the bid stage;</p>	<p>Types B &amp; D NESG 4.01; SCM-B1-1, page 3, ¶3.5, and QA15.01</p> <p>Types B &amp; D NESG 4.01; SCM-B1-1, page 3, ¶3.5, and QA15.01</p>	

BEQAM Section 4	BEQAM Text Disposition	PQAM Section 4
<p><del>2. An exception to or modification of BECo's requirements taken by the supplier either as a condition of accepting BECo's Purchase Order or subsequent to accepting it.</del></p> <p><del>A nonconformance reported by the supplier, whether or not reported in response to BECo's requirement (paragraph 4.3.1, above).</del></p>		
<p style="text-align: center;">EXHIBIT II-4-1</p> <p style="text-align: center;">REQUIREMENTS FOR A CERTIFICATE OF CONFORMANCE</p> <p><del>When a Certificate of Conformance is required by the procurement documents to be submitted by the supplier, it shall:</del></p> <ol style="list-style-type: none"> <li><del>1. Identify the purchased item or services by BECo's purchase order number.</del></li> <li><del>2. Identify the specific procurement requirements met by the item or service, either by verbatim quotation of the requirements, or by specific reference to the document(s), and location(s) within the document(s), where the requirements are specified. The requirements identified must include any changes, waivers, or deviations, approved by BECo, which apply to the item or service.</del></li> <li><del>3. Identify any procurement requirements that have not been met, and refer to the document(s) which record BECo's approval of the disposition of such nonconformances.</del></li> <li><del>4. Be attested to by the person responsible for assuring the quality of the item or service, as described in the supplier's BECo-approved Quality Assurance Manual.</del></li> </ol> <p><del>The supplier's Quality Assurance Manual, as approved by BECo's QAD, shall describe the system to control Certificates of Conformance, including a procedure for completing the certificates which meets the above requirements, and a procedure for review and approval of certificates.</del></p>	<p>Type B SCM-B4-1, Technical Clause No. 12 when in- voked in PO specifies that the C of C be prepared in compliance with ANSI N45.2.13</p>	

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**PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)**

**ATTACHMENT 2**

**To**

**QA PROGRAM CHANGE EVALUATION**

**CHANGE REQUEST NO. 00-02**

**For**

**SECTION 4**

**Revision 0**

3307 1067

**STANDARD REVIEW PLAN 17.3  
EVALUATION CHECKLIST**

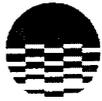
SRP Para.	Attribute	PQAM Section 4 Coverage
A.2.b	Independence has been established between persons and organizations executing performance activities and those executing verification and self-assessment activities.	SAT
A.2.e	Major delegation of work to participants outside the licensee's organization is identified and described.	SAT Refer to Section 1
A.3.a	Responsibility for the scope and implementation of an effective overall QA Program is retained by the organization.	SAT
A.3.b	The organization retains responsibility for the effectiveness of delegated activities.	SAT
A.3.d	Applicable portions of the QA Program are properly documented, approved, and implemented (personnel are trained and resources available) before an activity within the scope of the QA Program is implemented.	SAT Pending Revision to SCM and NE Procedures
B.4.a	A program is to be established and implemented to ensure that purchased items and services are of acceptable quality.	SAT Includes Section 7
B.4.b	The program is to include provisions for evaluating prospective suppliers and selecting only qualified suppliers.	SAT
B.4.c	The program is to include provisions for ensuring that qualified suppliers continue to provide acceptable products and services.	SAT Defers to Section 7
B.4.d	The program is to include provisions (such as source verification, receipt inspection, pre-installation and post-installation tests, and certificates of conformance) for accepting purchased items and services.	SAT Defers to Section 7
B.4.e	Applicable technical, regulatory, administrative, and reporting requirements (such as specifications, codes, standards, tests, inspections, special processes, and 10 CFR Part 21) are to be invoked for procurement of items and services.	SAT
B.4.f	The program is to include provisions for ensuring documentary evidence that an item conforms to procurement requirements is on site before the item is placed in service or used.	SAT Defers to Section 7
B.4.g	The program is to include provisions for ensuring that procurement, inspection, and test requirements have been satisfied before an item is placed in service or used.	SAT Defers to Section 7
B.4.h	The procurement of components, including spare and replacement parts, is to be subject to quality and technical requirements suitable for their intended service and to the purchaser's current QA Program requirements.	SAT

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SRP Para.	Attribute	PQAM Section 4 Coverage
B.4.i	Appropriate controls for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt, and quality evaluation of commercial grade items are to be imposed to ensure that they will perform satisfactorily in service.	SAT
B.5.a	A program is to be established and implemented to verify the quality of purchased items and services at intervals and to a depth consistent with the importance of the item or service to safety, complexity, and quantity and frequency of procurement.	SAT Defers to Section 7
B.5.b	The program is to be executed in all phases of procurement. As necessary, this may require verification of activities of suppliers below the first tier.	SAT Defers to Section 7

ATTACHMENT C

Annual Report of PQAM Changes



**Entergy**

*Entergy Nuclear Generation Company*

RTYPE: H8.46

*Pilgrim Nuclear Power Station*

**PILGRIM QUALITY ASSURANCE MANUAL (PQAM)  
SECTION 7**

**CONTROL OF PURCHASED MATERIAL,  
EQUIPMENT, AND SERVICES**

# ***CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES***

## **7.1 PURPOSE**

This Section of the Pilgrim Quality Assurance Manual (PQAM) establishes the system to ensure purchased items and services are of acceptable quality through verified conformance to procurement documents.

## **7.2 GENERAL REQUIREMENTS**

The control of purchased services and components, including spare and replacement parts, is subject to quality and technical requirements suitable for their intended service.

The program addresses all phases of procurement and includes measures to verify the quality of purchased items and services at intervals and to a depth consistent with the importance to safety, complexity, quantity, and frequency of the procurement. This program, in conjunction with the controls established in Section 4 of the PQAM, includes provisions for the evaluation of prospective sources, the selection of only qualified suppliers, and the assurance that qualified suppliers continue to provide acceptable products and services.

The program establishes provisions for source verification, receipt inspection, pre- and post-installation testing, and certificates of conformance in the acceptance of purchased items and services. These measures ensure that procurement, inspection, and test requirements have been satisfied and that documented evidence of an item's conformance to procurement documents is available at the site before the item is used, unless otherwise specified in procedures.

Additional detail concerning the control of purchased items and services may be found in the Regulatory Guides and associated standards as committed to in Section 2 of the PQAM (e.g., Regulatory Guides 1.33, 1.123, and 1.144).



PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)

CHANGE REQUEST NO. 00-03

SECTION 7 REV. NO. 0 PARAGRAPH NO. All PAGE NO. All

REVISION (exact wording)

This section has been rewritten in its entirety; therefore, no mark-up of Revision 23 is provided and no revision bars are included in Revision 0. See Attachment 1 for information relative to the existing text, the disposition of this text, and the revised wording.

PURPOSE OF REVISION

1. Complete rewrite to reformat text and provide a level of discussion consistent with the Entergy QA Manual applied to the regulated side of the Company.
2. To change the vendor performance evaluation process from an annual review to an ongoing evaluation process.

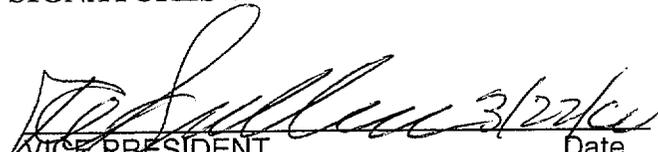
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 1/28/00  
ORIGINATOR Date

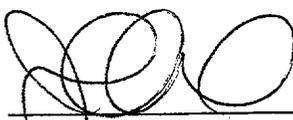
4/14/00  
EFFECTIVE DATE

APPROVAL SIGNATURES

 3/16/00  
VICE PRESIDENT, OPERATIONS PILGRIM Date

 3/22/00  
VICE PRESIDENT, STATION DIRECTOR Date

 2/22/00  
DIRECTOR, DESIGN ENGINEERING Date

 2/2/00  
DIRECTOR, NUCLEAR ASSESSMENT Date



## QA PROGRAM CHANGE EVALUATION (cont.)

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PQAM Change Request No. 00-03

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### CONCLUSION

Section 7 of the Pilgrim Quality Assurance Program, as revised, continues to satisfy 10CFR50, Appendix B. The changes made within this section meet the criteria within 10CFR50.54(a) as clarified by Direct Final Rule 64FR9029 relative to QA program changes that can be made without prior NRC approval.

The revision consists of a general change that rewrites the section using an SRP 17.3 format and a specific process change relative to periodic evaluations of vendor performance. The general rewrite of the section has no adverse program effect. This change is within the allowances of 10CFR50, Appendix B and compliant with the Station's existing commitments to Regulatory Guides and associated ANSI Standards. The specific change relative to the supplier evaluation process is considered to be a reduction in QA program commitments that is allowed to be made without prior NRC approval based on the evaluated application of a previously issued Safety Evaluation Report.

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### CHANGE EVALUATION

This revision to Section 7 is the third in a series of program changes that will rewrite the entire program under an SRP 17.3 format and describe the QA Program in a manner consistent with the level of detail prescribed in the Entergy QA Program applied to the regulated plants. The completed document will serve as a model for other nuclear plant acquisitions by ENG, which will yield a common quality assurance philosophy, methodology, and commitment within the corporation and maximize potential for shared resource applications among the Entergy family of operating nuclear units.

It is important to note that a QA Program written to an SRP 17.3 format is significantly different than one written under an SRP 17.1 and/or an SRP 17.2 format. SRP 17.1 and SRP 17.2 are the documents used by the NRC to review and accept previous editions of the Pilgrim QA Program. SRP 17.3 provides QA Program review attributes that cumulatively address Criterion 4, "*Procurement Document Control*," and Criterion 7, "*Control of Purchased Material, Equipment, and Services*," of 10CFR50, Appendix B. SRP 17.1 and SRP 17.2 address Criteria 4 and 7 individually, requiring a higher level of detail in QA Program descriptions addressing these criteria.

The detailed evaluations of the changes made are documented in Attachments 1 and 2 to this evaluation. Attachment 1 provides a verbatim copy of the previous Section 7 in a matrix form that identifies the disposition of text as compared to the associated wording contained in the new revision. The disposition of text falls within five categories:

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- Type A: Text where a specific change in QA requirements, commitments, or processes has occurred. These specific changes require a more detailed evaluation to ensure their acceptability.
- Type B: Deleted text relative to system implementation that is redundant to text already and more appropriately contained in implementing procedures. The procedures addressing the deleted text are identified.
- Type C: Text relative to Criterion 7 of 10CFR50, Appendix B that has been abbreviated to address the content in a manner consistent with the new format and/or level of detail in the Entergy QA Program used at the other regulated plants.
- Type D: Deleted text not essential to the area of discussion under the revised format or ownership of Pilgrim by Entergy.
- Type E: Text relative to Criterion 7 of 10CFR50, Appendix B adopted as written.

The general changes evaluated are those identified as Types B, C, D, and E. Type A changes are specific changes to PQAM requirements, commitments, and processes requiring a more detailed evaluation.

Attachment 2 documents the evaluation of the revised Section 7 relative to the criteria of SRP 17.3. These comparisons ensure all program elements and attributes within the SRP have either been addressed in the revised text or identified and deferred for action during subsequent revisions to other PQAM sections.

In order to reflect the new ownership, the revised organizational structure, and the realignment of responsibilities in effect after the transfer of the Station's operating license to Entergy Nuclear Generation Company (ENG), a complete rewrite of Section 7 to the Pilgrim Quality Assurance Manual (PQAM) has been prepared. The revision involves the general rewriting of text in an SRP 17.3 format as well as one specific program change. The evaluation and disposition of these changes is as follows.

#### General Change

From a general perspective, this revision describes Pilgrim measures to control purchased material, items, and services with a minimal level of detail. The level of detail effectively addresses the review criteria of SRP 17.3 and reflects the organizational structure and realignment of functional responsibilities that resulted from the sale of Pilgrim to Entergy. While much of the detailed text in the previous revision has been deleted, the level of detail provided in this revision effectively addresses the requirements of Criterion 7 of 10CFR50, Appendix B.

Notwithstanding the one Type A change identified that is evaluated separately in the following section to this evaluation, the balance of changes (Types B through E) are concluded to be acceptable. These changes have no adverse program effect and provide a level of detail responsive to SRP 17.3 QA Program review criteria as well as the requirements of Criterion 7 to 10CFR50, Appendix B. Additionally, under 10CFR50.54(a) and Direct Final Rule 64FR9029, the general changes made to rewrite this section are allowed to be made without NRC approval.

Specific Changes

This revision involves one specific change in QA requirements, commitments, or processes. Under the delegation of the supplier QA control function to the Entergy Material Requirements group, the annual supplier performance evaluation process previously prescribed in the PQAM will now be performed on an ongoing basis. While this change in the supplier performance evaluation process is within the allowances of 10CFR50, Appendix B, it involves a deviation from the Station's commitments to Regulatory Guide 1.144 and is considered to be a reduction in QA Program commitments.

Under 10CFR50.54(a) as clarified by Direct Final Rule 64 FR9029, changes that reduce QA Program commitments can be made without prior NRC approval provided the following conditions apply:

- Another licensee has previously addressed the type of change being made and obtained NRC approval through a Safety Evaluation Report.
- The licensee making the change has evaluated the bases of the prior NRC approval and determined them to be acceptable for application toward the change being made.

The reduction in QA Program commitment by the utilization of an ongoing supplier performance evaluation process represents a QA Program change that has been addressed previously by another utility and approved by the NRC.

Entergy previously addressed this change from an annual to an ongoing supplier evaluation process in 1977 for the Grand Gulf Nuclear Power Station. Revision 15 to the Entergy Grand Gulf Nuclear Station QA Manual was submitted to the NRC and approved as documented in the associated Safety Evaluation Report dated November 18, 1997. Under the sale of Pilgrim to Entergy, the Entergy Material Requirements group is to perform the supplier QA control function for Grand Gulf and Pilgrim Station utilizing the same implementing procedures. On this basis, it is acceptable to apply this SER toward the acceptability of the PQAM Section 7 change without requiring prior NRC approval.

As part of the overall effort to reformat the PQAM, Section 2 will be revised to reflect the use of an ongoing supplier evaluation process as a suitable alternative to the Station's commitments to Regulatory Guide 1.144 without exceptions.

Prepared by: *Richard J. Connell* 1/28/00  
Cognizant QA Engineer Date

Approved by: *R.S. Sheridan* 2/7/00  
Superintendent, Nuclear (QA) Date

*A. H. Griffin* 2/4/00  
Manager, Team (QA Assessment) Date

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**PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)**

**ATTACHMENT 1**

**To**

**QA PROGRAM CHANGE EVALUATION**

**CHANGE REQUEST NO. 00-03**

**For**

**SECTION 7**

**Revision 0**

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## TEXT DISPOSITION CATEGORIES

- Type A = Specific change--text revised or deleted reflective of a QA Program requirement, commitment, or process change.
- Type B = Text relative to system implementation which has been deleted as redundant to text already delineated and more appropriately contained in implementing procedures.
- Type C = Text revised to reflect the new ownership, the revised organization, or the resultant realignment of responsibilities or abbreviated to address the content in a manner consistent with the level of discussion under the new format.
- Type D = Text not essential to area of discussion under the revised format.
- Type E = Text adopted virtually as written.

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BEQAM Section 7	BEQAM Text Disposition	PQAM Section 7
<p><b><u>CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES</u></b></p> <p><b>7.1 PURPOSE</b></p> <p>This section establishes the requirements for control of purchased material and equipment (hereafter called items) and services to assure conformance to specified technical and quality assurance requirements. Measures to obtain objective evidence of quality furnished by suppliers include supplier evaluation and selection, audits and inspections at the source, and inspections and tests upon receipt.</p>	<p>Type C PQAM Sections 7.1 and 7.2</p>	<p><b><u>CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES</u></b></p> <p><b>7.1 PURPOSE</b></p> <p>This Section of the Pilgrim Quality Assurance Manual (PQAM) establishes the system to ensure purchased items and services are of acceptable quality through verified conformance to procurement documents</p>
<p><b>7.2 GENERAL REQUIREMENTS</b></p> <p>The quality of purchased items and services is assured by an appropriate combination of supplier and BECo activities which is decided during preparation and review of preliminary procurement documents as specified by the requirements of Section 4. When quality assurance activities by the supplier are specified, including submittal of documentation to BECo, the BECo Quality Assurance Department (QAD) evaluates the supplier's quality assurance program and its implementation to ensure the pertinent provisions of 10CFR50, Appendix B will be met by the supplier.</p> <p>Quality assurance activities by BECo include, as a minimum, acceptance of the item or service upon receipt or completion; methods include final inspection at the source, receipt inspection, review of supplier-provided documentation, and tests. Other quality assurance activities by BECo may include audits, surveillance inspections, in-process inspections, witnessing supplier activities, and review of supplier documents, such as engineering documents and procedures, before use.</p> <p><del>Conditions adverse to quality identified during BECo supplier oversight functions are promptly documented under a corrective action system which ensures effective resolution through supplier response evaluation and verification by BECo prior to closure.</del></p>	<p>Type C PQAM Section 7.2, 2<sup>nd</sup> para.</p> <p>Type C PQAM Section 7.2, 2<sup>nd</sup> and 3<sup>rd</sup> para.</p> <p>Type D</p>	<p><b>7.2 GENERAL REQUIREMENTS</b></p> <p>The control of purchased services and components, including spare and replacement parts, is subject to quality and technical requirements suitable for their intended service.</p> <p>The program addresses all phases of procurement and includes measures to verify the quality of purchased items and services at intervals and to a depth consistent with the importance to safety, complexity, quantity, and frequency of the procurement. This program, in conjunction with the controls established in Section 4 of the PQAM, includes provisions for the evaluation of prospective sources, the selection of only qualified suppliers, and the assurance that qualified suppliers continue to provide acceptable products and services.</p> <p>The program establishes provisions for source verification, receipt inspection, pre- and post-installation testing, and certificates of conformance in the acceptance of purchased items and services. These measures ensure that procurement, inspection, and test requirements have been satisfied and that documented evidence of an item's conformance to procurement documents is available at the site before the item is used, unless otherwise</p>



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BEQAM Section 7	BEQAM Text Disposition	PQAM Section 7
<p><del>7.3.1.b— Certain items used in fire protection systems, and which are UL listed or FM approved, are purchased without the supplier evaluation described above. In general, standard receipt inspection and tests upon receipt are performed to accept these fire protection items, based on evidence of UL listing or FM approval.</del></p> <p><del>Replacement and spare parts for such items may also be procured without supplier evaluation if the supplier is the maker of the item which is UL listed or FM approved, even though the parts are not individually UL listed or FM approved. If such parts are procured from another supplier, however, supplier evaluation is required (except as allowed by paragraph 7.3.2).</del></p> <p><del>7.3.1.c— Q items and services may be procured from a supplier who does not have an approved Quality Assurance Program if the supplier is uniquely qualified as an expert in a particular discipline or if other extraordinary circumstances are involved. The Team Leader (or above) proposing to use such a supplier for a Q service shall provide written justification for the use of the supplier and documentation of the supplier's unique qualifications. The QAD will determine those quality assurance requirements (surveillance, audits, review of final products, etc.) necessary to ensure acceptability of the Q item or service to be supplied.</del></p> <p><del>7.3.1.d— Certain services performed by suppliers at PNPS or other BECo facilities may be performed according to BECo's QA Program. Suppliers of such services are to be considered as BECo personnel; applicable BECo procedures are to be met; supplier personnel are to be trained in the applicable procedures; supplier activities are to be directly supervised</del></p>	<p>Type B Spec. M-504; SCM -B1-1, ¶6.3.2(e)</p> <p>Type B Spec. M-504; SCM -B1-1, ¶6.3.2(e)</p> <p>Type D The methods prescribed are not appropriate under the new organization. ANSI N45.2.13 allows the use of unapproved suppliers provided appropriate QA controls are specified. The option to execute this scenario is generically and summarily addressed in the wording to the new revision.</p> <p>Type D PNPS procedures relative to work process control, Station personnel training, and Sta-</p>	

BEQAM Section 7	BEQAM Text Disposition	PQAM Section 7
<p>by BECo employees; and supplier activities are subject to QAD oversight (inspection, surveillance, and audit).</p> <p>7.3.2 <del>Certain Q items designated commercial grade items (CGIs) according to Section 4 may be procured or upgraded from non-Q status with reasonable assurance of quality by BECo via special tests or inspections, supplier evaluation via commercial grade surveys, or source inspections or a combination of these acceptance methods. Requirements for procuring or upgrading a commercial grade item shall be established in a commercial grade item evaluation, per Section 4.</del></p> <p>When supplier evaluation via survey is required, the QAD performs, or obtains evidence of, a survey which assesses supplier documentation and implementation of required management controls, processes, and methods upon which BECo will rely. The evaluation includes historical quality performance data, as well. This evaluation must be completed before the supplier initiates any activities under a BECo Purchase Order.</p> <p>7.3.3 <del>The QAD maintains an Approved Vendor List (AVL) to permit the use of certain suppliers on an ongoing basis. The AVL identifies (1) suppliers of nuclear grade items and Q services whose quality assurance programs and implementation have been evaluated and approved; and (2) suppliers of commercial grade items whose controls on specific critical performance characteristics have been surveyed and approved.</del></p> <p>At least annually, the QAD performs an evaluation of each AVL supplier's quality performance, and at least triennially, audits or re-surveys the supplier to continue the approved status.</p>	<p>tion procedure control address this topic. NE4.01 addresses this topic. SCM B4-1 is to be revised to establish standard QA Clauses for this scenario.</p> <p>Type B NE4.05, ¶1.2 and SCM B1-1, ¶6.3.2(f) contain provisions for CGIs.</p> <p>Type B MRP-07.04 addresses the process for performing commercial surveys.</p> <p>Type B MRP-07.03</p> <p>Type A Specific Change; SER; See Evaluation. MRP-18 utilizes an ongoing per-</p>	

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BEQAM Section 7	BEQAM Text Disposition	PQAM Section 7
<p><del>Supplier audits or surveys may be performed by BECo or by others under contract to BECo for this service or be obtained from other utilities or the Nuclear Procurement Issues Committee (NUPIC). Also, ASME Certificates of Authorization and Quality System Certificate holders may be used as evidence of the programmatic adequacy of the supplier's documented quality assurance program for the scope of services identified on the certificate, subject to audit of the program's implementation. Other quality assurance activities, as described in 7.2 above, shall be implemented as needed to verify implementation of the supplier's quality assurance program or specified management controls.</del></p>	<p>formance evaluation process.</p> <p>Type B MRP-18.04 and MRP-18.09</p>	
<p><b>7.4 IN-PROCESS SUPPLIER AUDITS</b></p> <p>When warranted by the complexity or duration of the supplier's activities, the QAD performs audits of the supplier's quality assurance program implementation and effectiveness.</p>	<p>Type C PQAM Section 7.2, 2<sup>nd</sup> and 4<sup>th</sup> para.</p>	
<p><b>7.5 SOURCE INSPECTION</b></p> <p><del>7.5.1 Source inspection includes surveillance inspection, in-process inspection (hold points), witnessing supplier's activities (often requiring notification points), and final inspection (hold point).</del></p> <p>The QAD determines what source inspection is necessary, based on the supplier's approval status and the nature, complexity, and importance of supplier activities, and performs it to ensure procurement document requirements are met and purchased items and services are acceptable.</p> <p>7.5.2 Specific hold points and notification points are included in procurement document requirements.</p> <p><del>7.5.3 Surveillance inspections are performed by the QAD if conformance with the requirements of the procurement documents for a particular item cannot be determined when the</del></p>	<p>Type B MRP-10.01 and QA10.10 address source inspections.</p> <p>Type C PQAM Section 7.2, 3<sup>rd</sup> para.</p> <p>Types C and D PQAM Section 4,2</p> <p>Type B MRP-07.01</p>	

BEQAM Section 7	BEQAM Text Disposition	PQAM Section 7
<p>item is received or when known problems exist during the procurement phase. The purpose of such surveillance is to provide a selective review of the implementation of the supplier's quality assurance program or of the conformance of his project to requirements of the procurement documents. The QAD determines the degree of supplier surveillance inspection to be performed.</p> <p>7.5.4 — Source inspections may not be necessary when the quality of the item can be verified by review of supplier documents, or inspection or test upon receipt. Results of source inspections are documented and maintained by BECo.</p>	Type D	
<p>7.6 — <b><u>RECEIPT AND INSPECTION AND TESTS</u></b></p> <p>7.6.1 — Upon receipt at PNPS, purchased Q items are segregated from already processed items until performance of receipt inspection.</p> <p>7.6.2 — Except for nuclear fuel assemblies, the QAD performs receipt inspections. The Plant Group performs receipt inspection for nuclear fuel assemblies. Receipt inspection is performed according to the approved procurement document* requirements and pre-established inspection instructions.</p> <p>Documentary evidence that Q items conform to procurement document requirements* shall be available at the PNPS site before installation and/or use of such items to assure that:</p> <ol style="list-style-type: none"> <li>1) The item is properly identified and that its identification corresponds with any required documentation received.</li> <li>2) Stated packaging and shipping requirements have been maintained.</li> <li>3) All other procurement document requirements* have been met.</li> <li>4) Any required documentation and QA records received are acceptable.</li> </ol> <p style="text-align: center;"><b><u>NOTE</u></b></p> <p><b>If a non-Q item is to be upgraded to a "commercial grade item" (CGI) per Section</b></p>	<p>Type D PQAM Section 8</p> <p>Type B QA7.13, ¶5.3.</p> <p>Type C PQAM Section 7.2, 3<sup>rd</sup> para.</p> <p>Type B and NE4.05</p>	

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BEQAM Section 7	BEQAM Text Disposition	PQAM Section 7
<p><del>4, receipt inspection and testing shall be performed before the item is released from the warehouse. Instead of "procurement document requirements," the M&amp;CED shall use the approved CGI evaluation documentation.</del></p> <p><del>7.6.3 After identification per Section 8, accepted items are located in a controlled storage area.</del></p> <p><del>7.6.4 When document deficiencies or nonconforming items are identified, items are held in a segregated area, and identified and handled according to Section 15.</del></p> <p><del>7.6.5 A Material Receiving Inspection Report (MRIR) provides the written record of the results of receipt inspection and the disposition of received items and is maintained as part of the permanent plant records. Accepted Q items issued from the warehouse bear a Material Conformance tag. Items for which special or post installation testing is required by the CGI or by the purchase order bear a Conditional Release tag when issued from the warehouse. These tags identify the MRIR number and provide traceability to the documentation supporting the item's acceptance. If traceability to the MRIR is lost, an item becomes subject to the controls established for nonconforming items in Section 15.</del></p> <p><del>7.6.6 Acceptance of items may require testing by BECo or by another qualified supplier. Tests are controlled according to Section XI.</del></p>	<p>Types B and D PQAM Section 8</p> <p>Types B and D PQAM Section 15</p> <p>Type B QA7.13</p> <p>Types B and D PQAM Section 11</p>	
<p><del><b>7.8 DISPOSITIONING SUPPLIER CONDITIONS ADVERSE TO QUALITY</b></del></p> <p><del>Conditions adverse to quality which are disclosed during BECo supplier oversight functions are controlled under corrective action measures which ensure effective resolution of the concern.</del></p> <p><del>7.8.1 Upon identification, conditions adverse to quality are formally documented, evaluated for potential reportability under 10CFR21, and transmitted to the supplier for resolution and response. As appropriate, suppliers are required to address cause and extent of the</del></p>	<p>Type B QA10.10; MRP-10.01 and MRP-16.01</p> <p>Types B and D MRP-10.01 and MRP-16.01</p>	

BEQAM Section 7	BEQAM Text Disposition	PQAM Section 7
<p>condition in addition to the actions instituted to correct the condition and preclude its recurrence.</p> <p>7.8.2 Upon receipt, each supplier response is evaluated by QAD for acceptability with described corrective and preventive actions subsequently verified to ensure their adequacy and effectiveness prior to closure of the identified concern.</p>	<p>Types B and D QA10.10; MRP-10.01 and MRP-16.01</p>	

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**PILGRIM NUCLEAR POWER STATION  
PILGRIM QUALITY ASSURANCE MANUAL (PQAM)**

**ATTACHMENT 2**

**To**

**QA PROGRAM CHANGE EVALUATION**

**CHANGE REQUEST NO. 00-03**

**For**

**SECTION 7**

**Revision 0**

00307 1005

**STANDARD REVIEW PLAN 17.3  
EVALUATION CHECKLIST**

SRP Para.	Attribute	PQAM Section 7 Coverage
A.2.b	Independence has been established between persons and organizations executing performance activities and those executing verification and self-assessment activities.	SAT Refer to PQAM Section 1
A.2.e	Major delegation of work to participants outside the licensee's organization is identified and described.	SAT Refer to PQAM Section 1
A.3.a	Responsibility for the scope and implementation of an effective overall QA Program is retained by the organization.	SAT
A.3.b	The organization retains responsibility for the effectiveness of delegated activities.	SAT
A.3.d	Applicable portions of the QA Program are properly documented, approved, and implemented (personnel are trained and resources available) before an activity within the scope of the QA Program is implemented.	SAT Pending Revision to SCM and NE Procedures
B.4.a	A program is to be established and implemented to ensure that purchased items and services are of acceptable quality.	SAT Includes Section 4
B.4.b	The program is to include provisions for evaluating prospective suppliers and selecting only qualified suppliers.	SAT Refer to Section 4
B.4.c	The program is to include provisions for ensuring that qualified suppliers continue to provide acceptable products and services.	SAT
B.4.d	The program is to include provisions (such as source verification, receipt inspection, pre-installation and post-installation tests, and certificates of conformance) for accepting purchased items and services.	SAT
B.4.e	Applicable technical, regulatory, administrative, and reporting requirements (such as specifications, codes, standards, tests, inspections, special processes, and 10 CFR Part 21) are to be invoked for procurement of items and services.	SAT Refer to Section 4
B.4.f	The program is to include provisions for ensuring that documentary evidence that an item conforms to procurement requirements is on site before the item is placed in service or used.	SAT
B.4.g	The program is to include provisions for ensuring that procurement, inspection, and test requirements have been satisfied before an item is placed in service or used.	SAT

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SRP Para.	Attribute	PQAM Section 7 Coverage
B.4.h	The procurement of components, including spare and replacement parts, is to be subject to quality and technical requirements suitable for the components' intended service and to the purchaser's current QA program requirements.	SAT Refer to Section 4
B.4.i	Appropriate controls for the selection, determination of suitability for intended use (critical characteristics), evaluation, receipt, and quality evaluation of commercial grade items (CGIs) are to be imposed to ensure that CGIs will perform satisfactorily in service.	SAT Includes Section 4
B.5.a	A program is to be established and implemented to verify the quality of a purchased item and/or service at intervals and to a depth consistent with the item's or service's importance to safety, complexity, and quantity and frequency of procurement.	SAT
B.5.b	The program is executed in all phases of procurement. As necessary, this may require verification of activities of suppliers below the first tier.	SAT Includes Section 4

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