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# Memo

NO-01-0019  
January 11, 2001

**TO:** Northeast Utilities Quality Assurance Program Controlled Copy Owners

**FROM:**   
Dorothy Bruce, NUQAP Coordinator

**SUBJECT:** Northeast Utilities Quality Assurance Program (NUQAP) Topical Report,  
Revision 22, Change 3 (Document No. MP-02-OST-BAP01)

Enclosed is Northeast Utilities Quality Assurance Program Topical Report (NUQAP), Revision 22, Change 3. The change modifies Appendix E of the NUQAP by adding an additional exception (#16) which reads as follows:

“ANSI N18.7-1976, paragraph 4.5, states in part, ‘Audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to assure that an audit of all safety-related functions is completed within a period of two years.’

NU has established a 90 day grace period applied to the 24 month frequency for internal audits. This grace period will not be applied to audits of the Emergency Preparedness Program which satisfy the requirements of 10CFR50.54(t) or to audits of the Security Plan which satisfy the requirements of 10CFR50.54(p)(3) 73.56(g)(1) and (g)(2), and 73.55(g)(4). The audit frequency of these audits are described in their respective plans. For activities deferred in accordance with the 90 day grace period, the next performance due date for such activities will be based on their original scheduled date, i.e., in all cases the periodicity for these activities will not be allowed to exceed the original commitment plus 90 days.”

Please replace the entire contents of the existing Quality Assurance Program Appendix E and replace with the enclosed Appendix E. Change 3 changes are in ***bold and italics*** with a revision bar in the right-hand margin. The footer of the affected section includes a reference to Change 3. Please remove the contents of Appendix E, Revision 22, dated 7/6/00, and replaced with the attached Appendix E, Revision 22, Chg. 3, dated 1/15/01.

Please note the effective date of Revision 22 is **January 15, 2001**. If you have any questions, contact D. Bruce at X3185.

Attachments: Summary of changes incorporated as part of Revision 22, Change 3

Enclosure:

Northeast Utilities Quality Assurance Program Topical Report Revision 22, Chg.3

DSB/dsb

**Summary of Changes to NUQAP Rev. 22 Incorporated as Change 3**

<b><u>Section</u></b>	<b><u>Summary Description of Changes</u></b>	<b><u>Reference</u></b>
Appendix E	Modifies Appendix E, Program Exceptions, to add Exception #15 to Allow 90-Day Grace Period For Audits as defined in ANSI N18.7-1976, paragraph 4.5 (See Appendix E text for additional information/clarification)	NUQAP Change Request 00-17

## APPENDIX E

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

#### PROGRAM EXCEPTIONS

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

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

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

2. Deleted

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

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

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

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

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

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

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

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

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

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

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

Did not specify a singular design approach;

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

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

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

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

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

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

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

extent that packaging, shipping, storage and handling methods are employed which are commensurate with the nature of the product.

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

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

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

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

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

(a) "The results of actions taken to correct deficiencies...at least once per 6 months."

(b) "...technical specifications and applicable license conditions - at least once per 12 months."

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

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

10. Deleted.

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

(a) Technical verification of the data produced

(b) Surveillance and/or audit of the activity

(c) Review of the objective evidence for conformance to the procurement document requirements such as certifications, stress reports, etc."

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

12. Deleted.

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

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

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

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

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

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

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

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

Assessment Program also periodically reviews selected procedures and identifies deficiencies and improvements through the Corrective Action Program.

15. *Pending NRC Approval - submitted as #15, text to be added upon NRC approval.*

16. *“ANSI N18.7-1976, paragraph 4.5, states in part, ‘Audits of selected aspects of operational phase activities shall be performed with a frequency commensurate with their safety significance and in such a manner as to assure that an audit of all safety-related functions is completed within a period of two years.’*

*NU has established a 90 day grace period applied to the 24 month frequency for internal audits. This grace period will not be applied to audits of the Emergency Preparedness Program which satisfy the requirements of 10CFR50.54(t) or to audits of the Security Plan which satisfy the requirements of 10CFR50.54(p)(3) 73.56(g)(1) and (g)(2), and 73.55(g)(4). The audit frequency of these audits are described in their respective plans. For activities deferred in accordance with the 90 day grace period, the next performance due date for such activities will be based on their original scheduled date, i.e., in all cases the periodicity for these activities will not be allowed to exceed the original commitment plus 90 days.”*