

Mr. E. Thomas Boulett Ph.D  
 Senior Vice President - Nuclear  
 Boston Edison Company  
 Pilgrim Nuclear Power Station  
 RFD #1 Rocky Hill Road  
 Plymouth, MA 02360

November 12, 1996

SUBJECT: ISSUANCE OF AMENDMENT NO.168 TO FACILITY OPERATING LICENSE NO. DPR-35, PILGRIM NUCLEAR POWER STATION (TAC NO. M95325)

Dear Mr. Boulette:

The Commission has issued the enclosed Amendment No.168 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station. This amendment is in response to your application dated May 1, 1996, as supplemented on August 12, 1996.

The proposed amendment will relocate the administrative controls related to the quality assurance review and audit requirements of Section 6, Technical Specifications (TSs) 6.5.B.8, "Nuclear Safety Review and Audit Committee-Audits," from the Pilgrim Station Technical Specifications to the Boston Edison Quality Assurance Manual (BEQAM). This change is in accordance with the guidance contained in NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." In addition, the Safety Evaluation includes the NRC staff review and approval of the BEQAM changes in support of this amendment.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register Notice.

Sincerely,

/s/

Alan Wang, Project Manager  
 Project Directorate I-1  
 Division of Reactor Projects - I/II  
 Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosures: 1. Amendment No.168 to License No. DPR-35  
 2. Safety Evaluation

cc w/encls: See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 12, 1996

Mr. E. Thomas Boulette, Ph.D  
Senior Vice President - Nuclear  
Boston Edison Company  
Pilgrim Nuclear Power Station  
RFD #1 Rocky Hill Road  
Plymouth, MA 02360

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DPR-35, PILGRIM NUCLEAR POWER STATION (TAC NO. M95325)

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Sincerely,

A handwritten signature in cursive script that reads "Alan Wang".

Alan Wang, Project Manager  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosures: 1. Amendment No. 168 to  
License No. DPR-35  
2. Safety Evaluation

cc w/encls: See next page

E. Thomas Boulette

Pilgrim Nuclear Power Station

cc:

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DATED: November 12, 1996

AMENDMENT NO. 168 TO FACILITY OPERATING LICENSE NO. DPR-35-PILGRIM NUCLEAR  
POWER STATION

Docket File  
PUBLIC  
PDI-1 Reading  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

BOSTON EDISON COMPANY

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.168  
License No. DPR-35

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
  - A. The application for amendment filed by the Boston Edison Company (the licensee) dated May 1, 1996, as supplemented August 12, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended to approve the relocation of certain Technical Specification requirements to licensee-controlled documents, as described in the licensee's application, dated May 1, 1996, as supplemented on August 12, 1996, and reviewed by the staff's safety evaluation report dated November 12, 1996. This license is also amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-35 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No.168, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days. Implementation shall include the relocation of Technical Specification requirements to the appropriate licensee-controlled document as identified in the licensee's application dated May 1, 1996, as supplemented on August 12, 1996, and reviewed by the staff's safety evaluation report dated November 12, 1996.

FOR THE NUCLEAR REGULATORY COMMISSION

S. Singh Bajwa, Acting Director  
Project Directorate I-1  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: November 12, 1996

ATTACHMENT TO LICENSE AMENDMENT NO. 168

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

Remove

6-7

6-8

6-15

Insert

6-7

6-8

6-15



**6.0 ADMINISTRATIVE CONTROLS (Cont)**

**6.5 REVIEW AND AUDIT (Cont)**

**B. Nuclear Safety Review and Audit Committee (NSRAC) (Cont)**

**8. Audits**

Audits of facility activities shall be performed in accordance with the Boston Edison Quality Assurance Manual under the cognizance of the NSRAC.

**9. Authority**

The NSRAC shall report to and advise the Senior Vice President - Nuclear on those areas of responsibility specified in Section 6.5.B.7 and 6.5.B.8.

**10. Records**

Records of NSRAC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSRAC meeting shall be prepared, approved and forwarded to the Senior Vice President - Nuclear, NSRAC members, and others the Chairman may designate.

6.0 ADMINISTRATIVE CONTROLS (Cont)

6.5 REVIEW AND AUDIT (Cont)

B. Nuclear Safety Review and Audit Committee (NSRAC) (Cont)

10. Records (Cont)

- b. Reports of reviews encompassed by Section 6.5.B.7.e, f, g and h above, shall be prepared, approved and forwarded to the Senior Vice President - Nuclear, with a copy to the Station Director within 21 days following the completion of the review.
- c. Audit reports encompassed by Section 6.5.B.8 above shall be processed in accordance with the Boston Edison Quality Assurance Manual.

6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for each reportable event:

- A. The Commission shall be notified and/or a report submitted pursuant to the requirements of either 10 CFR 50.72 or 10 CFR 50.73.
- B. Each Reportable Event Report submitted to the Commission shall be reviewed by the ORC and submitted to the NSRAC Chairman and the Station Director.

6.7 Deleted

6.8 PROCEDURES

- A. Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7 - 1972 and Appendix "A" of USNRC Regulatory Guide 1.33, except as provided in 6.8.B and 6.8.C below.
- B. Each procedure of 6.8.A above, and changes thereto, shall be reviewed by the ORC and approved by the responsible department manager prior to implementation. These procedures shall be reviewed periodically as set forth in administrative procedures.

NOTE: ORC review and approval of procedures for vendors/contractors, who have a QA Program approved by Boston Edison Company, is not required for work performed at the vendor/contractor facility.

C. Temporary changes to procedures of 6.8.A above may be made provided:

- 1. The intent of the original procedure is not altered.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 168 TO FACILITY OPERATING LICENSE NO. DPR-35

BOSTON EDISON COMPANY

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

By letters dated May 1, 1996, as supplemented August 12, 1996, Boston Edison Company (BECo/the licensee) requested changes to the Technical Specifications (TSs) for Pilgrim Nuclear Power Station. The proposed changes would relocate the administrative controls related to the quality assurance review and audit requirements of Section 6, TSs 6.5.B.8, "Nuclear Safety Review and Audit Committee-Audits," from the Pilgrim Station TSs to the Boston Edison Quality Assurance Manual (BEQAM). This change is in accordance with the guidance contained in NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." The August 12, 1996, letter provided clarifying information and additional changes that did not change the initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

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

Section 50.36 provides, that with respect to limiting conditions for operations (LCO), four criteria to be used in determining whether particular safety functions are required to be included in the TS. While the 4 criteria specifically apply to LCOs, in adopting the revision to the rule the Commission indicated that the intent of these criteria can be utilized to identify the optimum set of administrative controls in the TS (60 FR 36957). Addressing administrative controls 10 CFR 50.36 states that they "are the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure safe operation of the facility in a safe manner." The specific content of the administrative controls section of the TS is therefore that information that the Commission deems essential for the safe operation of the facility that is not already adequately covered by other regulations. Accordingly, the staff has

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

### 3.0 EVALUATION

#### 3.1 Technical Specification Change

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

The licensee's May 1, 1996, letter to the NRC proposes to relocate the administrative controls related to the quality assurance review and audit requirements of Section 6, TSs 6.5.B.8, "Nuclear Safety Review and Audit Committee-Audits," from the Pilgrim Station TSs to the BEQAM. This change is in accordance with the guidance contained in NRC AL 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance." In particular, the licensee has proposed to modify the TSs to state that all the following audits currently performed by TS 6.5.B.8 will be performed in accordance with the BEQAM:

- a. The conformance of facility operation to provisions contained within the TSs and applicable license conditions,
- b. The training and qualifications of the entire unit staff,
- c. The results of all actions required by deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety,
- d. The performance of all activities required by the Quality Assurance program to meet the criteria of Appendix "B", 10 CFR 50,
- e. The Emergency Plan and implementing procedures,
- f. The Station Security Plan and implementing procedures,
- g. Any other area of facility operation considered appropriate by

- the NSRAC or the Senior Vice President - Nuclear, and  
h. The Fire Protection Program and implementing procedures.

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

The staff has reviewed the proposed changes to BEQAM Section 18, "AUDITS," and has determined that all of the above audits in the current TSs will be relocated to Section 18 of the BEQAM. The staff concludes that the current TSs described above are not required by 10 CFR 50.36, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. The review and audit functions do not need to be controlled by the TSs because an equivalent level of control can be achieved by the BEQAM while providing for a more appropriate change control process. Change control for the relocated TS 6.5 review and audit provisions, proposed by the licensee to be relocated from the current TS to the QA Program, will be provided by 10 CFR 50.54(a). The level of safety of plant operation is unaffected by this change and is therefore, acceptable. The following discussions detail the NRC staff's conclusions regarding the relocation of selected Administrative controls from TS:

a. Security Plan Implementation and Emergency Plan Implementation

The licensee proposed to relocate the requirements, in existing TS 6.5.B.8.e and 6.5.8.f, related to the implementation and audit of the Security Plan and Emergency Plan.

The removal of the administrative control TS for the implementation and audit of the Security Plan and the Emergency Plan is addressed in GL 93-07. Since the Security Plan requirements are specified in 10 CFR 50.54, 73.40, 73.55 and 73.56, and the Emergency Plan requirements are specified in 10 CFR 50.54 and 10 CFR Part 50, Appendix E, Section V, the staff recommended removal of these requirements from the Improved Standard Technical Specifications and relocated to their respective plans. The licensee has relocated the requirements for the Emergency Plan to the BEQAM Section 18.7.2 as a Program Review to be performed on an annual basis. The audit requirements for the Security Plan has been relocated to BEQAM Section 18.3.1.B, "Audit Program Elements-Once per 12 Months."

Future changes in the audit review requirements must be made in accordance with 10 CFR 50.54(p) for the Security Plan and 10 CFR 50.54(q) for the Emergency Plan. The staff concludes that, in conjunction with this change to the plans, the sufficient requirements for emergency planning in 10 CFR 50.47, and 50.54, and for security in 10 CFR 50.54 and 73.55 for drills, exercises, testing, and maintenance of the program, will be met. The staff concludes that these regulatory requirements are sufficient and, therefore, relocating these provisions from the TS to the BEQAM is acceptable.

#### b. Review and Audits

The licensee proposed that the existing requirements in TS 6.5.B.8 related to review and audit functions be relocated to the BEQAM except with respect to those associated with the security and emergency plans which are previously described.

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

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

Audit requirements are specified in the BEQAM to satisfy 10 CFR Part 50, Appendix B, Criterion XVIII. Audits are also covered by ANSI N18.7, ANSI N45.2, 10 CFR 50.54(t), 10 CFR 50.54(p), and 10 CFR Part 73.

The licensee has proposed to relocate the provisions in the existing TS to the BEQAM. The licensee has committed to incorporate a 2-year limit on performance-based audit schedules, in accordance with ANSI N-18.7, and retain the existing frequency for audits of the fire protection program on a fixed basis in accordance with GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications."

The staff concludes that sufficient regulatory controls exist under 10 CFR Part 50, Appendix B for the implementation of the functions specified in the BEQAM, and sufficient controls exist under 10 CFR 50.54(a) for subsequent changes to the BEQAM such that relocating these review and audit requirements to the BEQAM is acceptable.

c. Supporting Changes to TS

In addition, by letter August 12, 1996, the licensee proposed to revise TS section 6.5.B.10.C and delete TS 6.14, "Fire Protection Program." TS 6.5.B.10.C has been revised from:

"Audit reports encompassed by Section 6.5.B.8 above shall be forwarded to the Senior Vice President - Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit."

to:

"Audit reports encompassed by Section 6.5.B.8 above shall be processed in accordance with the Boston Edison Quality Assurance Manual."

The licensee stated the audit report issuance control will be relocated and replicated in BEQAM Section 18.4, "Audit Reports, subsections 18.4.1. and 18.4.2." The licensee has proposed to change the BEQAM wording to read 30 working days rather than 30 days which is consistent with the original TS. The staff did not believe this change is consistent with the intent of the TS. The licensee has revised the BEQAM to delete "working." Based on this change, the staff agrees that the audit report issuance control has been maintained in the BEQAM and is consistent with the TS requirement. The staff concludes that these changes are administrative in nature as it supports the above TS change and are acceptable.

The licensee has also proposed to delete TS 6.14, "Fire Protection Program." These audit requirements will be relocated and replicated into BEQAM Section 18.3, "Audit Program Elements, subsections 18.3.1.A and 18.3.1.B." The licensee stated that when the 3-year audit is performed by an outside independent fire protection consultant, it will be in lieu of the annual audit. The licensee noted that the scope of the 3-year audit will encompass the scope of the annual audit and therefore would be repetitive. The Fire Protection Program and implementing procedures will be audited internally every two years. The staff agrees that the fire protection program will be maintained in the BEQAM and is consistent with the TS requirement.

In conclusion, the above relocated requirements relating to administrative controls are not required to be in the TS under 10 CFR Section 50.36 or Section 182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. In addition, the Staff finds that the resulting new administrative controls provides all of the requirements needed to satisfy 10 CFR 50.36(c)(5), and sufficient regulatory controls exist under



10 CFR 50.59 and 50.54(a), or other applicable regulation to assure continued protection of the public health and safety. Accordingly, the staff has concluded that these requirements may be relocated from the TS to the above specified documents.

#### Boston Edison Quality Assurance Manual Changes

The review and audit functions do not need to be controlled by the TSs because an equivalent level of control can be achieved by the BEQAM while providing for a more appropriate change control process. Change control for the relocated TS 6.5 review and audit provisions, proposed by the licensee to be relocated from the current TS to the QA Program, will be provided by 10 CFR 50.54(a). The level of safety of plant operation will be unaffected by the relocation of the review and audit functions from the TS to the BEQAM. Pursuant to 10 CFR 50.54(a), the staff review of the proposed changes to the BEQAM in support of the above TS change is provided below:

- a. The audit for the conformance of facility operation to provisions contained in the Technical Specifications was revised from at least once per year to once per 24 months. The compliance with the Technical Specifications is evaluated on a continuing basis in various functional area audits and surveillances in addition to a dedicated audit every two years as a minimum. Additionally, organizations of the Nuclear Division are responsible for self-assessments in the area of Technical Specification surveillance performance. The licensee's Quality Assurance Department (QAD) will monitor and verify proper implementation of the self assessment process. The staff considers this acceptable.
- b. The audit for training and qualification of the entire unit staff was revised from once per year to once per 24 months. Each functional area audit will incorporate verification of certain training and qualification criteria to provide continuous coverage and assessment. Additionally, the self-assessment practices of the Nuclear Training Department will be monitored by QAD to verify proper implementation of the self-assessment process. The staff considers this acceptable.
- c. The audit for the corrective actions was revised from once per six months to once per 24 months. The requirement will be satisfied on an ongoing basis via audits and surveillance of all functional areas. Each audit will evaluate the adequacy of corrective action taken since the previous audit. Additionally, the self-assessment activities for the corrective action process conducted by the various licensee Nuclear Division and Group organizations will be monitored by QAD to verify proper implementation of the self-assessment process. The staff considers this acceptable.
- d. The audit for the performance of all activities required by Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, remains once per two years.

- e. The audit for the Emergency Plan and implementing procedures was revised from once per 24 months to a Program Review performed on an annual basis. Performance of annual reviews is consistent with 10 CFR 50.54(t). By letter dated August 12, 1996, the licensee amended Sections 18.2.3 and 18.2.5 of the BEQAM based on a conference call with the staff on July 19, 1996. These changes to the BEQAM more clearly defined the auditors responsibilities and qualifications. With these changes the staff considers this acceptable.
- f. The audit for Station Security Plan and implementing procedures was revised from once per two years to once per year. The audit frequency reflects 10 CFR 73.55 and 10 CFR 50.54 requirements regarding an audit of this area.
- g. Additional audits of facility operation may be considered by Nuclear Safety Review and Audit Committee (NSRAC) or the Senior Vice President, Nuclear. The option allows the licensee's management to allocate resources to areas of declining performance. This provision remains the same.
- h. The audit for the Fire Protection Program and implementing procedures remains the same at once per two years.
- i. The relocation of the TS administrative controls included adding new BEQAM Paragraphs 18.6.1 through 18.6.7 to provide general requirements for the performance of program reviews. Program reviews are another method by which QAD conducts oversight of specific activities using surveillance monitoring. The program reviews consist of a series of surveillance over a designated period of time, performed by QAD personnel having the same qualifications as QAD personnel performing audits. The surveillance, lead by QAD, may use technical specialists. The results of the program reviews are compiled, analyzed, and reported to senior management. Findings identified during the surveillance will be processed as nonconformances and appropriate corrective action taken as required by the BEQAM. The results of the surveillance will be summarized in a report required to be issued within 30 days of the end of the review period. This review process is considered by the licensee to be an enhancement of its existing review and audit program and is not intended to reduce any quality commitments. The staff considers this acceptable.

The NRC staff has reviewed the changes to the relocated TS sections and determined that the incorporation of the changes into the BEQAM are acceptable in that the BEQAM continues to satisfy the applicable criteria of Appendix B to 10 CFR Part 50. Based on the considerations discussed above and the fact that any subsequent changes to the relocated TS provisions will be controlled in accordance with 10 CFR 50.54(a), the staff concludes that the revisions to the BEQAM, as proposed in the letter dated May 1, 1996, and August 12, 1996, are acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Massachusetts State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

This amendment changes recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: L. Campbell  
A. Wang

Date: November 12, 1996