



Entergy Nuclear Vermont Yankee, LLC  
Entergy Nuclear Operations, Inc.  
185 Old Ferry Road  
Brattleboro, VT 05302-0500

February 9, 2004  
BVY 04-016

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

- References:
- (a) Letter, VYNPC to USNRC, "Annual Submittal of Quality Assurance Program Changes," BVY 03-12, dated February 5, 2003.
  - (b) Letter, USNRC to Entergy Operations, Inc., "Consolidation of Quality Assurance (QA) Programs for All Entergy Sites – Arkansas Nuclear One, Grand Gulf Nuclear Station, River Bend Stations and Waterford Steam Electric Station (TAC NO. M97893)," dated November 6, 1998.
  - (c) Letter, USNRC to First Energy Nuclear Operating Company, "Revision 1 to the First Energy Nuclear Operating Company (FENOC) Quality Assurance Program Manual (QAPM) – Beaver Valley Power Station, Unit Nos.1 and 2, Davis Besse Nuclear Power Station, Unit 1, Perry Nuclear Power Plant, Unit 1 (TAC Nos. MB0914 and MB0915)," dated April 17, 2001.

**Subject: Vermont Yankee Nuclear Power Station  
License No. DPR-28 (Docket No. 50-271)  
Annual Submittal of Quality Assurance Program Changes**

Pursuant to 10CFR50.54(a)(3) and 10CFR50.71(e), Vermont Yankee (VY) is providing herewith a copy of Revision 14 of the Vermont Yankee Operational Quality Assurance Manual (VOQAM), incorporating changes made to the quality assurance program since the last update (Revision 13) submitted with Reference (a). The "Summary of Changes" at the front of the manual provides a description of each change made subsequent to Revision 13 by section and page number, and the text on each page affected by the most recent revision to that page is indicated by revision bars in the left-hand margin. The "Table of Contents/Index" provides a list of effective pages for each VOQAM section and the current revision number for all of the pages in the section. For ease of document administration, VY updates the VOQAM by entire sections rather than single pages; only the content identified by revision bars was changed under the revision number shown on each page, although the revision number has been updated for all pages in the section. Each change is supported by a written evaluation in accordance with 10CFR50.54(a)(3), on file at VY, demonstrating that the change does not constitute a reduction in commitments contained in the quality assurance program as previously approved by the NRC. There were no changes requiring NRC approval prior to implementation during the period covered by this submittal.

Based on discussions with the NRR Project Manager for Vermont Yankee at the time of transition to the Entergy Quality Assurance Program Manual (QAPM) in June of 2003, a remaining reference to the VOQAM by title in the Vermont Yankee Technical Specifications precludes retirement of the VOQAM until the Technical Specifications can be revised. Therefore, the VOQAM presently exists as a framework for reference to the applicable sections of the Entergy QAPM, which was approved by the NRC in Reference (b) and (c), and which has been adopted under 10CFR50.54(a)(3) identically to the other Entergy Nuclear Northeast facilities. Control of quality-related activities has been established in the Entergy QAPM via these references.

2004

This is to certify, as required by 10CFR50.71(e)(2)(i), that the information contained in the enclosed document accurately represents changes made under the provisions of 10CFR50.54(a)(3) since the previous submittal.

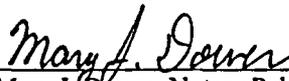
Please contact Mr. Wayne M. Limberger at (802) 258-5830 if you have any questions regarding this submittal.

Sincerely,

  
\_\_\_\_\_  
Jay K. Thayer  
Site Vice President

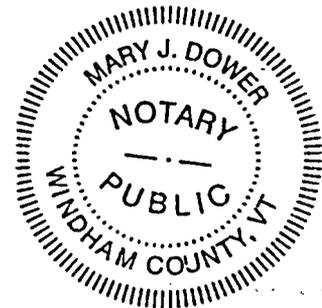
STATE OF VERMONT )  
  )ss  
WINDHAM COUNTY )

Then personally appeared before me, Jay K. Thayer, who being duly sworn, did state that he is Site Vice President of Vermont Yankee Nuclear Power Station, that he is duly authorized to execute and file the foregoing document, and that the statements therein are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
Mary J. Dower, Notary Public  
My Commission Expires February 10, 2007

Attachment

- cc: USNRC Region I Administrator
- USNRC Resident Inspector - VYNPS
- USNRC Project Manager - VYNPS
- USNRC Region 1 Director of Nuclear Materials Safety and Safeguards
- VT Department of Public Service



Docket No. 50-271  
BVY 04-016

**ATTACHMENT 1**

**Vermont Yankee Nuclear Power Station**

**Annual Submittal of Quality Assurance Program Changes**

**Vermont Yankee Operational Quality Assurance Program, Revision 14**

VERMONT YANKEE NUCLEAR POWER STATION

ATTACHMENT A  
 VOQAM Summary of Changes – Revision 14  
 Page 1 of 4

Item No.	VOQAM Section	Change Description	Reason for Change
1	Policy Statement	Added a statement referring users to the NRC-approved Entergy Quality Assurance Program Manual (QAPM). Removed content duplicated or superseded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
2	I	Removed content that is duplicated or superseded in the QAPM. Revised to delete or clarify responsibilities that will not be exercised as written due to organizational restructuring under the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
3	II	Changed to reference specific QAPM sections that establish QA Program criteria. Removed content that is duplicated or superseded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
4	III	Changed to reference specific QAPM sections that establish Design Control criteria. Removed content that is duplicated or superseded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
5	IV	Changed to reference specific QAPM sections that establish Procurement Document Control criteria. Removed content that is duplicated or superseded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
6	V	Changed to reference specific QAPM sections that establish Instruction, Procedure and Drawing criteria. Removed content that is duplicated or superseded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.

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ATTACHMENT A  
 VOQAM Summary of Changes – Revision 14  
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Item No.	VOQAM Section	Change Description	Reason for Change
7	VI	Changed to reference specific QAPM sections that establish Document Control criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
8	VII	Changed to reference specific QAPM sections that establish Purchased Material Control criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
9	VIII	Changed to reference specific QAPM sections that establish Material Identification criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
10	IX	Changed to reference specific QAPM sections that establish Special Process Control criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
11	X	Changed to reference specific QAPM sections that establish Inspection criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
12	XI	Changed to reference specific QAPM sections that establish Test Control criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
13	XII	Changed to reference specific QAPM sections that establish M&TE Control criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.

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ATTACHMENT A  
 VOQAM Summary of Changes – Revision 14  
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Item No.	VOQAM Section	Change Description	Reason for Change
14	XIII	Changed to reference specific QAPM sections that establish Handling, Storage and Shipping criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
15	XIV	Changed to reference specific QAPM sections that establish Inspection, Test and Operating Status Control criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
16	XV	Changed to reference specific QAPM sections that establish Nonconforming Material Control criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
17	XVI	Changed to reference specific QAPM sections that establish Corrective Action criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
18	XVII	Changed to reference specific QAPM sections that establish QA Records criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
19	XVIII	Changed to reference specific QAPM sections that establish Audit Program criteria. Removed content that is duplicated or superceded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.

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Item No.	VOQAM Section	Change Description	Reason for Change
20	Appendix A	Changed to reference committed ANSI standard in lieu of current content, which is being removed in accordance with FENOC Safety Evaluation Report TAC Nos. MB0914 and MB 0915.	Supports adoption of the NRC-approved Entergy QAPM.
21	Appendix B	Changed to reference specific QAPM sections that delineate QA Program exceptions. Removed content that is duplicated or superseded in the QAPM.	Supports adoption of the NRC-approved Entergy QAPM.
22	Appendix C	Changed to reference UFSAR Section 1.4.2, to which the Safety Classification requirements of the VOQAM were previously relocated.	Supports adoption of the NRC-approved Entergy QAPM
23	Appendix D	Changed to reference committed ANSI standards and implementing procedures in lieu of current content, which is being removed in accordance with FENOC Safety Evaluation Report TAC Nos. MB0914 and MB 0915.	Supports adoption of the NRC-approved Entergy QAPM.

VERMONT YANKEE NUCLEAR POWER STATION

Vermont Operational Quality Assurance Manual

VOQAM

PREPARED BY: Wayne M. Limberger 5/27/03  
Wayne M. Limberger Date  
Quality Assurance Manager

REVIEWED BY: Robert J. Wanczyk 5/28/03  
Robert J. Wanczyk Date  
Director, Nuclear Safety Assurance  
Vermont Yankee

APPROVED BY: Jay K. Thayer 6/3/2003  
Jay K. Thayer Date  
Site Vice President  
Vermont Yankee

VERMONT YANKEE NUCLEAR POWER STATION

VOQAM

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VERMONT YANKEE NUCLEAR POWER STATION

VOQAM

AMENDMENT/REVISION SHEET

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
0	5/1/98	To adopt Rev. 27 of the YOQAP as Rev.0 for the VOQAM. (Reference VY letter to NRC, dated 4/12/98.)
1	10/16/98	To update organizational changes, removed all references to YAEC and YNSD. VY assumed all YNSD responsibilities. Changed Sr. Vice President, Operations, to Director of Operations.
1A	4/6/99	Revised Section I to expand and correct the responsibilities of various key personnel based on internal audit recommendations and recent organization changes. Added Appendix D, which relocates certain Administrative Controls related to quality assurance, formerly contained in Section 6.0 of the Technical Specifications, to the Quality Assurance Manual. Revised Sections V, XVII and XVIII to refer to Appendix D for additional requirements regarding the activities covered by those sections. (Reference Proposed Change No. 208 and VY letter to NRC, BVY 99-20, dated February 1, 1999, as amended.)
2	9/7/99	Revised Section II to include reference to ANSI N101.4-1972, "Quality Assurance for Protective Coatings Applied to Nuclear Facilities" and Regulatory Guide 1.54, June 1973. Revised Appendix B to clarify provisions for initiating procedure changes in response to plant events, violations and nonconformances. Revised Appendix D to incorporate Section 6.2.A.h from Technical Specifications Amendment No. 168, per NRC Administrative Letter 95-06. Revised the Policy Statement, Sections I, II, III, XV, XVI and XVIII, and Appendix D to change "Director of Operations" title to "Senior Operations Executive". Revised Section I to include a note explaining the use of "Senior Operations Executive". Revised Section I to address organizational changes in the plant maintenance area.

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AMENDMENT/REVISION SHEET

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
3	12/8/99	Revised Section V and Appendix D to eliminate PORC review and Plant Manager approval of most plant procedures based on 10CFR50.54(a)(3) evaluation of other utilities' NRC approval bases for this reduction in commitment. Revised Appendix D to change "Manager of Operations to read "Senior Operations Executive." Removed list of plant procedures from Appendix D, Section 6.5.A, since it is redundant to list retained in Technical Specifications. Revised Appendix D to replace references to Technical Specification Proposed Change No. 208 with License Amendment No. 171 and clarify text accordingly. Revised Appendix D to state that PORC reviews plant changes that affect the FSAR. Added role of "Superintendent" to Section V responsibilities.
4	2/22/00	Revised Section V to include details from the 10CFR50.54(a)(3) evaluation for VOQAM Rev.3 to demonstrate how the NRC approval conditions for two Safety Evaluation Reports provided to WPPSS and Clinton Station were met by Vermont Yankee. This change satisfies an NRC request made on 1/11/00 during their review of VOQAM Rev. 3. Revised Appendix D to include supporting information for the Section V changes.
5	3/15/00	Revised Section I to address the use of more than one contractor to obtain quality assurance services, and to correct obsolete references to Technical Specification sections that have been moved to Appendix D of the VOQAM. Revised Appendix B to incorporate the revised Regulatory Guide 1.26 and ANSI N18.7 exceptions approved by the NRC on January 13, 2000 (Reference letter BVY 00-04.)
6	7/12/00	Revised Section I to adopt approved organizational changes. Revised all Sections except XII, XIV and Appendices A through C to incorporate results of the annual VOQAM review. Revised Sections I and IX to address ownership of special process programs, procedures, personnel qualification and implementation activities.

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AMENDMENT/REVISION SHEET

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
7	12/14/00	Revised Section I and the Organizational Chart to reflect changes in the Engineering Departments, the Training Department and the Reactor and Computer Engineering Department. Removed Emergency Planning from the Director of Safety and Regulatory Affairs' list of direct reports in Section I. Standardized the positions of QA Manager, Procurement Manager, Training Superintendent and Information Technologies Manager in Section I with other similar positions regarding duties common to all such positions. Revised Appendix D to remove specific job titles for PORC membership and replace them with functional area designations. Made editorial changes in Sections I, VI and Appendix D to correct errors introduced in previous revisions.
8	07/09/01	Revised Section I and the Organizational Chart to reflect organizational and responsibility changes in Executive Management, Operations, Maintenance, Work Management and Information Technologies. Revised wording in Sections III, V, XI, and Appendix D involving application of 10CFR50.59 screenings and written safety evaluations, to adopt requirements from the new 10CFR50.59 regulation. Revised Sections VI, VII, VIII, X, XI and XV to complete implementation of changes made in VOQAM Rev. 5 that removed references to a single source of contracted QA services, allowing establishment of a separate Vendor QA function. Revised Sections II and VI to remove obsolete wording that was related to the superseded YAEC QA Program, YOQAP-1-A. Revised Sections III and Appendix D to remove superseded responsibilities. Made editorial changes to Sections II, IV, VI, VII, IX, X, XI, and XV to provide clarification, improve wording and correct errors. Revised Section XVII to identify the responsibilities of the Information Technologies Department in controlling electronic QA data. Revised Appendix D to adopt NRC RIS 99-02 regarding PORC review of the Fire Protection Program and implementing procedures.
9	10/02/01	Revised Section XVII to correct the alignment of the Document Control Center from the Technical Support Department to the Engineering Support Department. Revised Exception IX.B of Appendix B to remove references to the two-year usage threshold for routine plant procedures, as permitted by NRC SER NVY 01-76.

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AMENDMENT/REVISION SHEET

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
10	01/04/02	Revised Organization, Section I, to reflect reassignment of responsibility for control of general maintenance and modification contractors to the Maintenance Support Department. Revised Section XVII to adopt the guidance contained in NRC Regulatory Issue Summary 2000-18.
11	02/19/02	Revised Organization, Section I to introduce a Director of Engineering position to serve as a temporary replacement for the Vice President, Engineer during the latter's reassignment to another role. Also revised this section to reflect relocation of ownership for the vendor equipment manual program from Maintenance Support to Work Control. Revised Section III to align the requirements for PORC and NSARC review of proposed plant changes with those of Appendix D.
12	07/31/02	Revised all pages to change header from "Vermont Yankee Nuclear Power Corporation" to "Vermont Yankee Nuclear Power Station" and updated specific references in this regard within the text. Updated all affected Vermont Yankee management descriptions to adopt Entergy titles. Incorporated approved organizational changes in Administration, Engineering, Procurement, Maintenance Support, System Engineering and Radiation Protection. Made minor editorial changes as necessary.
13	12/02/02	Revised the Organization section to show reporting of the following positions to ENN White Plains Office: QA Manager; Director, Engineering; Manager, Materials, Procurement and Contracts; Manager, Information Technologies; Manager, Training and Development. Clarified the VOQAM roles of various senior managers. Changed Vendor QA designation to Supplier QA. Changed NSARC references to SRC and realigned to the Entergy reporting hierarchy. Corrected PORC review criteria to agree with new 10CFR50.59. Minor administrative and editorial corrections.
14	06/03/03	Revised sections as appropriate to reference the comparable Entergy QAPM sections that establish the equivalent level of control. Deleted all contents of the manual that are duplicated or superceded in the QAPM. Deleted or clarified management responsibilities that won't be exercised as written due to organizational restructuring under the QAPM. Deleted references to the Vice President, Operations position, which doesn't exist under the Entergy organizational hierarchy.

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POLICY STATEMENT

OPERATIONAL QUALITY ASSURANCE PROGRAM

The Operational Quality Assurance Program described in the Entergy Quality Assurance Program Manual (QAPM) is in effect at the Vermont Yankee site, and is applicable to all work performed on safety-related structures, systems and components. It is the policy of those organizations operating under this Quality Assurance Program to strive for excellence in all aspects of nuclear power plant operation. This goal can only be attained if each individual recognizes that Quality is everyone's responsibility. Each worker, supervisor, and manager has a role to play in achieving the goal of "doing it right the first time." Only if we recognize that Quality is of paramount importance can we continue to provide for the safe and reliable generation of power.

The function of the quality verification program is to assess the adequacy, content, and appropriateness of the work being performed and to facilitate continuous enhancements. This function supports the line organizations and provides management with needed feedback. However, supervision and management should not rely solely upon the efforts of the Quality Assurance groups for quality verification; they must also take an active role in self-assessment of those activities under their control to identify quality problems. As previously noted, the ultimate responsibility for quality lies with the line organization.

The safe and reliable generation of power can only be achieved with the cooperation and support of all personnel. We expect that every individual will perform his or her task with the skill, professionalism, and dedication necessary to achieve this goal.

## VERMONT YANKEE NUCLEAR POWER STATION

### I. ORGANIZATION

#### A. SCOPE

This section of the Operational Quality Assurance Program, in conjunction with Section A.2 of the QAPM, describes the duties and responsibilities of the personnel involved in establishing and executing the Operational Quality Assurance Program.

#### B. RESPONSIBILITY

The responsibility for design, maintenance, and operation of the Plant rests with Vermont Yankee. The responsibility for implementing the Operational Quality Assurance Program within Vermont Yankee is vested in the Site Vice President, who has delegated certain areas of authority for the development and implementation of certain phases of the Program as set forth in the following paragraphs of this section.

The Quality Assurance Department, reporting to the Director, Oversight, has the organizational responsibility for the continuing review and audit of the implementation of the Operational Quality Assurance Program.

#### C. ORGANIZATIONAL RELATIONSHIPS

The lines of authority for all personnel involved in the implementation of the Operational Quality Assurance Program are shown in Figure 1, and their QA-related responsibilities are defined in the following sections. Interfacing between the Vermont Yankee plant and any contracted service organization is provided by the cognizant VY organization, as stipulated in the contracts. The qualification requirements for those key personnel are identified in approved job descriptions as required by ANSI N18.7.

##### 1. Entergy Nuclear Operations Staff

- a. Authorities and responsibilities of off-site staff are described on Section A.2 of the QAPM.

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### 2. Site Staff

a. Site Vice President (See Section A.2 of the QAPM for off-site reporting interfaces.)

1. Reports to the Senior Vice President and Chief Operating Officer at the Entergy Nuclear Northeast White Plains Office (WPO).
2. Provides on-site executive direction to senior managers regarding strategies for pursuit of quality objectives.
3. Fosters a site culture in which quality is actively promoted and integrated into all aspects of work.
4. Provides for mediation and resolution of quality issues that cannot be resolved at the Vice President/Director level.
5. Reviews and approves all changes to this manual.
6. Ensures the QA Program is effectively implemented.

b. Deleted

c. Director, Engineering

1. Reports to the Site Vice President, Engineering at WPO.
2. Has site responsibility for design and plant engineering. Oversees the planning, scheduling, and direction of activities of employees engaged in design changes, alterations, and systems readiness.
3. Provides for review and approval of safety-related design change documents, selected plant programs and policies.
4. Provides for interfacing between Engineering and other plant functions.
5. Responsible for Fire Protection.
6. Ensures that applicable engineering programs and procedures effectively implement the QA Program.

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### d. Director, Nuclear Safety Assurance

1. Reports to the Site Vice President.
2. Provides on-site support and oversight for the Quality Assurance Department.
3. Reviews all changes to the QA Program.
4. Provides for the review of and compliance with federal and state regulations and standards for nuclear power facilities.

### e. Quality Assurance Manager

1. Reports directly to the Director Oversight, at WPO, and receives on-site support and oversight from the Director, Nuclear Safety Assurance.
2. Reviews or recommends site policy relative to Quality Assurance practices.
3. Assures that the Operational Quality Assurance Program as described in this manual satisfies the requirements of 10CFR50 Appendix B and ANSI N18.7-1976, and is modified and/or revised as standards, regulations and experience dictate.
4. Provides for evaluation of changes to this manual to the requirements of 10CFR50.54(a)(3).
5. Reviews all changes to the Operational Quality Assurance Program.
6. Provides for preparation, control and distribution of this manual
7. Establishes the qualification requirements for the principal Quality Assurance staff positions to assure competence commensurate with responsibility.
8. Provides for the training and retraining of Quality Assurance personnel in Quality Assurance and audit techniques.
9. Authorizes personnel performing Quality Assurance functions to have direct access to management levels which will assure accomplishment of quality-affecting activities.

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10. Provides for effective implementation of the Program within the Quality Assurance Department, and establishes policies, programs and procedures under which the Quality Assurance Department functions.
11. Ensures that personnel performing Quality Assurance functions have sufficient authority and organizational freedom to:
  - a. identify quality problems,
  - b. initiate, recommend, or provide solutions through designated channels, and
  - c. verify implementation of solutions.
12. Verifies that the QA Program is effectively implemented throughout the Vermont Yankee organization for all activities requiring Quality Assurance.
13. Provides, through Quality Assurance Department audits and surveillances, for independent verification of site operation by individuals or groups who do not have direct responsibility for performing the work, to assure that applicable approved procedures, specifications, licenses and safety regulations are satisfied.
14. Provides for the stoppage of unsatisfactory work; and for the control of further processing or delivery of nonconforming material.
15. Provides for the audit of design changes and specifications to verify adequacy of quality requirements. Independent review shall be performed by an uninvolved, but technically knowledgeable person in the engineering discipline.
16. Provides for the audit, inspection and/or surveillance of on-site contractor/vendor activities to assure the effectiveness of contractual interfaces and compliance with the applicable criteria of 10CFR50, Appendix B and ANSI N18.7-1976.
17. Provides to SRC a periodic review of the Operational Quality Assurance Program to determine the adequacy and effectiveness of the Program.
18. Appoints the NDE and N45.2.6 Level III Examiner.
19. Fulfills other responsibilities (except PORC Vice Chairman) common to all Manager positions as described in I.C.2.j.

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f. Materials, Purchasing and Contracts (MP&C) Manager

1. Reports to the Director, MP&C at WPO for the following quality-affecting activities.
2. Responsible for procurement and receipt inspection of all materials and services required for operations and continued maintenance of the facility.
3. Oversees the storage and preservation of materials.
4. Responsible for ensuring regulatory compliance for materials and services procured, stored, and utilized in the plant's safety-related systems.
5. Fulfills other responsibilities (except PORC Vice Chairman) common to all Manager positions as described in I.C.2.j.

## VERMONT YANKEE NUCLEAR POWER STATION

### g. Training and Development Manager

1. Reports to the Vice President, Training at WPO.
2. Establishes and maintains all operator and plant training programs.
3. Remains current on all regulatory requirements concerning training and qualifications of plant personnel and ensures that plant training programs and procedures are revised in a timely manner in response to changing needs and regulations.
4. Provides overall coordination and supervision for the Technical Training Superintendent and the Operations Training Superintendent in carrying out their duties.
5. Evaluates the effectiveness of the training programs and the performance of the individuals participating in the training.
6. Fulfills other responsibilities (except PORC Vice Chairman) common to all Manager positions as described in I.C.2.j.

### h. Information Technologies Manager

1. Reports to the Director, Information Technologies at WPO for the following quality-affecting activities.
2. Manages site administration of the Software Quality Assurance Program.
3. Provides for retrievability and loss/damage protection for electronic QA data until converted into a permanent storage medium.
4. Fulfills other responsibilities (except PORC Vice Chairman) common to all Manager positions as described in I.C.2.j.

## VERMONT YANKEE NUCLEAR POWER STATION

### i. General Manager, Plant Operations

1. Reports to the Site Vice President.
2. Directs the plant's implementation of the Operational Quality Assurance Program.
3. Prescribes and directs the development of Plant procedures, instructions, schedules, and programs as necessary to assure the safe and dependable operation of the facility.
4. Maintains a thorough knowledge of, and assures compliance with, the regulatory requirements for operating a nuclear power plant.
5. Directs the preparation and maintenance of power plant records, reports, and logs.
6. Acts as Chairman of the Plant Operations Safety Review Committee (PORC).
7. Provides information and reports to the Safety Review Committee as required and as directed by the Site Vice President.
8. Directs the control and surveillance of all special nuclear material on site.
9. Assures the implementation of training/retraining programs as required by the Plant license, regulations, or applicable standards; and as necessary to assure safe work practices and compliance with standard operating practices, license and Technical Specifications, safety rules, and applicable regulations.

## VERMONT YANKEE NUCLEAR POWER STATION

### j. General Responsibilities Common to All Manager Positions

1. Directs and oversees implementation of aspects of the Quality Assurance Program in the functional areas supervised.
2. Maintains a thorough knowledge of, and assures compliance with, the regulatory requirements of a nuclear power plant in the functional areas supervised.
3. Directs the preparation and maintenance of power plant records, reports and logs, as applicable.
4. Assists in the development of plant procedures, programs, instructions and schedules in the functional areas supervised.
5. Provides information, reports and records as directed by the General Manager, Plant Operations.
6. Assists in establishment of safe work practices, and the training and instruction of plant personnel in the observance of standard operating practices, NRC license and Technical Specifications, and safety rules and regulations.
7. Acts as Vice Chairman of the PORC.

### k. Maintenance Manager

1. Reports to the General Manager, Plant Operations.
2. Oversees evaluation, coordination, and direction of the activities of employees engaged in the installation, inspection, testing, adjustment, maintenance and repair of plant equipment as appropriate. Is responsible for the Instrument & Control Maintenance, Mechanical and Electrical Maintenance, and Maintenance Support areas.
3. Fulfills other responsibilities common to all Manager positions as described in I.C.2.j.

## VERMONT YANKEE NUCLEAR POWER STATION

### l. Technical Services Manager

1. Reports to the General Manager, Plant Operations.
2. Responsible for the Reactor Engineering, Radiation Protection, Technical Support, and Chemistry Departments.
3. Fulfills other responsibilities common to all Manager positions as described in I.C.2.j.

### m. Operations Manager

1. Reports to the General Manager, Plant Operations.
2. Responsible for the Operations Department functions.
3. Has the responsibility and authority for insuring the safe and efficient operations of the plant and its supporting systems in accordance with applicable station licenses, technical specifications, procedures, instructions, established company policy and safety rules.
4. Fulfills other responsibilities common to all Manager positions as described in I.C.2.j.
5. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

### n. Planning & Scheduling / Outage Manager

1. Reports to the General Manager, Plant Operations.
2. Responsible for the Work Control Department including the quality-related functions of preventive maintenance, repair parts/materials selection, and equipment maintenance record-keeping.
3. Responsible for long-range production and refueling outage work scheduling under the Work Management and Outage Administration Departments.
4. Fulfills other responsibilities common to all Manager positions as described in I.C.2.j.

## VERMONT YANKEE NUCLEAR POWER STATION

- o. Design Engineering Manager
  - 1. Reports to the Director, Engineering.
  - 2. Exercises design authority for the mechanical/structural, electrical/I&C/fluid systems and nuclear engineering efforts necessary to support the normal and emergency needs of the plant.
  - 3. Oversees the planning, scheduling, and direction of activities of employees engaged in design changes and alterations.
  - 4. Provides for generation, review and approval of safety-related design change and installation documents, support for the installation of these design changes, and close-out of the associated documentation.
  - 5. Maintains formal documentation of plant design basis and design change activities necessary to meet operational and regulatory requirements
  - 6. Provides for review and approval of drawings and specifications.
  - 7. Reviews and approves selected plant programs and policies.
  - 8. Provides for probabilistic safety analyses in support of plant operational needs.
  - 9. Fulfills other responsibilities common to all Manager positions as described in I.C.2.j.

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p. Engineering Support Manager

1. Reports to the Director, Engineering.
2. Manages the contracts and contractors used to accomplish special projects, and oversees project implementation.
3. Provides for the generation of project plans, schedules budget, manloading, etc. necessary to support field activities.
4. Oversees and manages the Project Engineering and Procurement Engineering efforts necessary to support normal and emergency needs of the plant.
5. Provides for implementation of special processes when performed by on-site contractors in support of plant modifications or repairs and replacements.
6. Fulfills other responsibilities common to all Manager positions as described in I.C.2.j.

q. System Engineering Manager

1. Reports to the Director, Engineering.
2. Provides electrical and mechanical systems engineering support to Operations and Maintenance departments, including review of plant equipment failure frequency and evaluation of equipment reliability.
3. Assesses the performance of plant systems and makes recommendations for improvement.
4. Oversees and manages programs associated with the systems engineering function, including the Maintenance Rule compliance program, Fire Protection Program, special process programs (NDE, welding, heat treating), Inservice Inspection Program, Inservice Testing Program, and component engineering.
5. Fulfills other responsibilities common to all Manager positions as described in I.C.2.j.

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- r. General Responsibilities Common to All Department Superintendent Positions
1. Manages implementation of aspects of the Quality Assurance Program that relate to the activities of the Department.
  2. Consistent with company policies and applicable instructions, institutes necessary programs, issues instructions, originates procedures and ensures that department administrative systems exist such that the responsibilities assigned to the Department are executed effectively in accordance with operational and regulatory requirements.
  3. Consistent with company policies and applicable instructions, organizes Department functions and activities, and assigns and schedules qualified personnel to accomplish Department objectives.
  4. Plans, schedules and supervises the day-to-day activities of the Department, and maintains a current status of Department activities, commitments and requirements. Coordinates the activities of the Department with other plant functions as applicable.
  5. Prepares and maintains long-range plans and schedules for Department commitments such as personnel training, retraining and qualification, preventive maintenance, material procurement, plant modifications, etc.
  6. Develops and maintains the procedural controls necessary to fulfill all department commitments and requirements. Reviews all Department procedures to ensure that they are current, accurate and approved.
  7. Prepares and/or supervises the preparation of Department reports, logs and records as required. Ensures that necessary quality documents (reports, logs, inspection and test records, etc.) are prepared, reviewed, approved and properly filed to establish that Department activities meet all operational and regulatory requirements.
  8. Establishes and directs a program of departmental training that will assure a staff of personnel capable of safety and effectively performing their duties in accordance with established practices, procedures and regulations.
  9. Fulfills other responsibilities common to all supervisory positions and carries out other duties and responsibilities as assigned by the cognizant Director or Manager.

## VERMONT YANKEE NUCLEAR POWER STATION

### s. Technical Support Superintendent

1. Reports to the Technical Services Manager.
2. Oversees and manages programs associated with the technical/administrative support areas, including, Corrective Action, Operating Experience, and Regulatory Reporting Compliance.
3. Fulfill other responsibilities common to all Superintendent positions as described in I.C.2.r.

### t. Maintenance I&C Superintendent

1. Reports to the Maintenance Manager.
2. Is responsible for instrumentation and control maintenance activities throughout the plant. Such activities include installation, inspection and surveillance testing, calibration, adjustment, preventative maintenance, and repair of the plant instrumentation and controls equipment.
3. Establishes calibration techniques, frequencies, and records as necessary to assure reliable indication and control for plant system parameters.
4. Assumes responsibility for the condition, maintenance, and reliability of plant instrumentation and control equipment other than that specifically assigned to other departments.
5. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

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### u. Maintenance Mechanical and Electrical Superintendent

1. Reports to the Maintenance Manager.
2. Is responsible for mechanical and electrical maintenance activities throughout the plant. Such activities include installation, inspection and surveillance testing, adjustment, preventive maintenance and repair of plant mechanical and electrical equipment.
3. Provides for control of special processes (welding, heat treating, nondestructive examinations, etc.) when performed by the Mechanical and Electrical Maintenance organization or on-site contractors in support of plant modifications or repairs and replacements.
4. Assumes responsibility for the condition, maintenance, and reliability of plant mechanical and electrical equipment other than that specifically assigned to other departments.
5. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

### v. Maintenance Support Superintendent

1. Is responsible for engineering support of plant maintenance activities, including day-to-day support of maintenance craft functions, interaction with the work planning and scheduling process, resolution of maintenance-related plant issues and technical problems, review of design change documents and project work.
2. Manages the contracts and contractors for general maintenance and modifications, and oversees implementation.
3. Is responsible for facilities maintenance activities, including control of maintenance tools.
4. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

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### w. Work Control Superintendent

1. Reports to the Planning & Scheduling, Outage Manager.
2. Manages the planning of work activities necessary to support the operation and maintenance of the facility.
3. Ensures that the maintenance planning and control database for equipment and preventive maintenance is maintained.
4. Manages the Preventive Maintenance Program.
5. Establishes and maintains equipment history records.
6. Selects and orders materials and spare parts in areas of assigned responsibility.
7. Manages the Vendor Equipment Manual Maintenance Program.
8. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

### x. Work Management Superintendent

1. Reports to the Planning & Scheduling, Outage Manager.
2. Manages the scheduling of work activities necessary to support the operation and maintenance of the plant.
3. Manages the program for assessing the cumulative safety risk of removing plant equipment from service in accordance with 10CFR50.65(a)(4).
4. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

## VERMONT YANKEE NUCLEAR POWER STATION

### y. Chemistry Superintendent

1. Reports to the Technical Services Manager.
2. Assumes responsibility for providing the necessary administrative supervision and required personnel to meet the needs of the established Radiological Environmental Monitoring Programs.
3. Prescribes and maintains chemistry conditions and purity of reactor coolant and other process fluids within applicable limits.
4. Develops and maintains records of all chemistry and radiochemistry aspects of the plant.
5. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

### z. Radiation Protection Superintendent

1. Reports to the Technical Services Manager.
2. Controls processing of all radioactive waste shipments in accordance with 10CFR71 and maintains applicable records.
3. Develops work and housekeeping practices in radiologically controlled areas of the plant to minimize personnel exposure and the spread of radioactive contamination.
4. Assumes responsibility for receipt, storage, shipment, and disposal of radioactive material utilizing proper Federal and State regulations (other than nuclear fuel).
5. Has direct access to the General Manager, Plant Operations in all health physics matters.
6. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

VERMONT YANKEE NUCLEAR POWER STATION

aa. Reactor Engineering Superintendent

1. Reports to the Technical Services Manager.
2. Supervises the Reactor Engineering Department, which includes the Process Computer Engineering Group. Directs performance of nuclear and thermal core analysis, planning and scheduling of fuel rearrangements and fuel cycling, rod withdrawal sequences, rod patterns, and reactor maneuvering during plant startup.
3. Maintains the Emergency Response Facility Information System (ERFIS) and the Safety Parameter Display System (SPDS) in support of normal and emergency plant operations.
4. Establishes and directs a program of Nuclear Performance Monitoring and Surveillance Testing as required by the plant license, approved plant procedures, or other plant requirements.
5. Establishes a program of control, accountability and record keeping as required to maintain an accurate inventory of licensed special nuclear material.
6. Fulfills other responsibilities common to all Superintendent positions as described in I.C.2.r.

## VERMONT YANKEE NUCLEAR POWER STATION

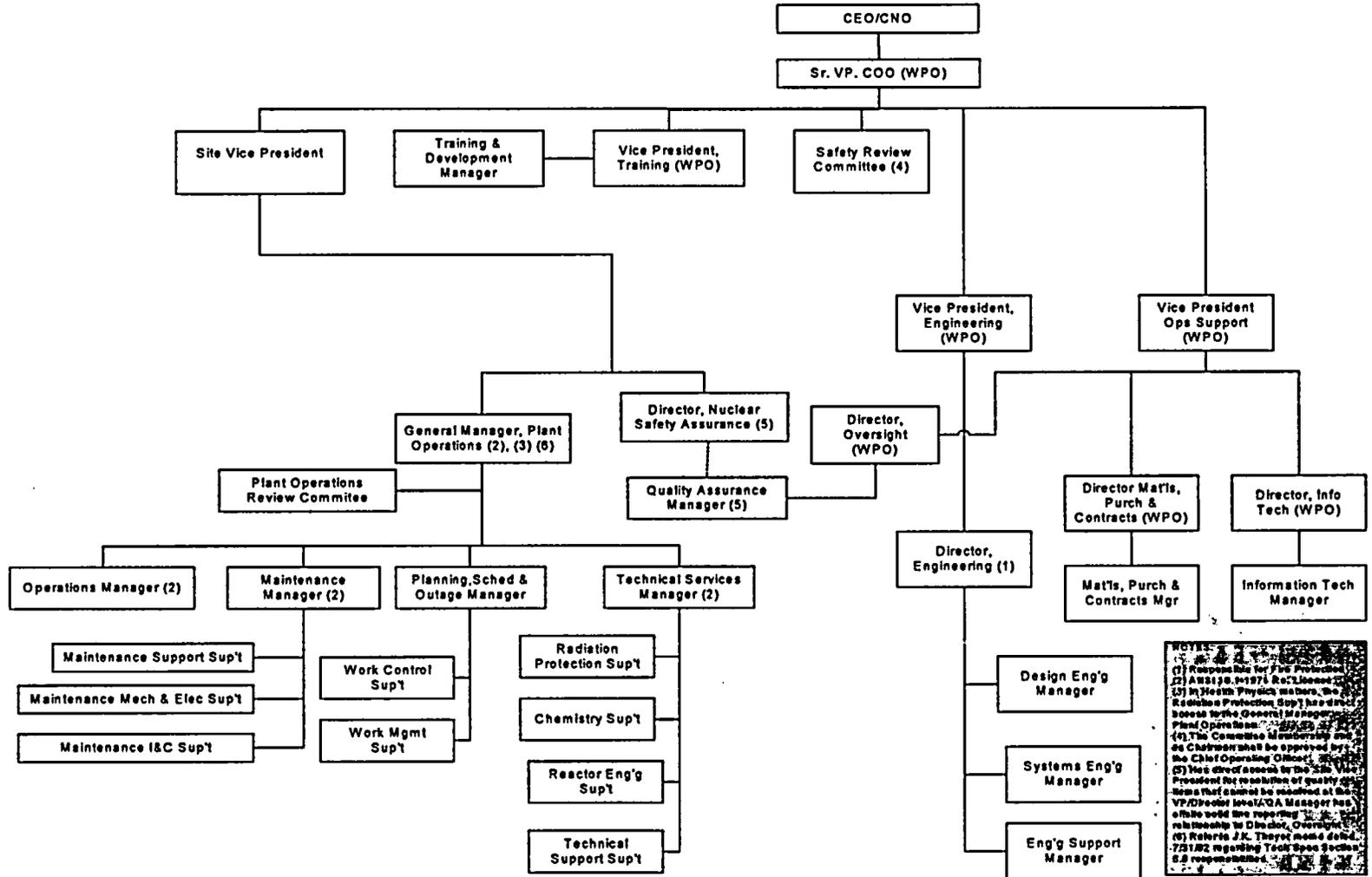
### D. REVIEW AND AUDIT

Two review committees, one off-site and one on-site, have been established for the Vermont Yankee plant whose objectives are to insure the plant is operated safely, utilizing good engineering practices. The committees are charged with making recommendations to modify operational methods or safety precautions.

Further discussion of the committees is provided in Section A.2.f and Table 1, sub-sections c.9, through c.12 of the QAPM, as well as in applicable Regulatory Guides (RGs) and endorsed standards to which Vermont Yankee is committed, or in site administrative procedures, as approved in First Entergy Operating Company Safety Evaluation Report, TAC Nos. MB0914 and MB0915.

# VERMONT YANKEE NUCLEAR POWER STATION

## Entergy Nuclear Operations VERMONT YANKEE OPERATIONAL QUALITY ORGANIZATION



**NOTES:**  
 (1) Responsible for Eng'g Oversight  
 (2) Assigned to 1974 Re-Licensing  
 (3) In Health Physics matters, the Radiation Protection Sup't has direct access to the General Manager, Plant Operations  
 (4) The Committee members and its Chairman shall be approved by the Chief Operating Officer  
 (5) Has direct access to the Site Vice President for resolution of quality issues that cannot be resolved at the VP/Director level/QA Manager has ultimate reporting relationship to Director, Oversight  
 (6) Refers to J.K. Taylor, licensee 721182 regarding Technical Services responsibilities

## VERMONT YANKEE NUCLEAR POWER STATION

### II. QUALITY ASSURANCE PROGRAM

Sections A.1, A.7 and Table I of the QAPM establish the criteria to be applied to systems requiring Quality Assurance which prevent or mitigate the consequences of postulated accidents which could cause undue risk to the health and safety of the public. The structures, systems, components and other items requiring quality assurance are listed in the Vermont Yankee Safety Classification Program.

Compliance with the requirements of the Operational Quality Assurance Program - based on the criteria of Title 10 of the Code of Federal Regulations, Part 50, Appendix B, and ANSI N18.7-1976 - shall be the responsibility of all personnel involved with activities affecting operational safety.

Individuals having direct responsibilities for establishment/distribution control/implementation of the Operational Quality Assurance Program are delineated in Section A.2 of the QAPM and in Section I, "Organization", of this manual.

Section A.5 of the QAPM establishes measures for the indoctrination and training of staff personnel performing activities affecting operations or requiring quality assurance.

Establishment of an effective Operational Quality Assurance Program is assured through consideration of and conformance with the Regulatory Positions in the Regulatory Guides as listed in, and as modified in, Table I of the QAPM.

The below listed Regulatory Guides also apply at Vermont Yankee.

1. ANSI N101.4-1972, Quality Assurance for Protective Coatings Applied to Nuclear Facilities (Endorsed by Regulatory Guide 1.54)

## VERMONT YANKEE NUCLEAR POWER STATION

### III. DESIGN CONTROL

Sections B.2 and B.3 of the QAPM establish measures to assure that the design of and changes to structures, systems, and components covered by the Operational Quality Assurance Program are controlled.

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IV. PROCUREMENT DOCUMENT CONTROL

Section B.4 of the QAPM establishes the measures necessary to assure that applicable regulatory requirements, design bases and other requirements which are necessary to assure adequate quality, are suitably included or referenced in the documents for procurement of material, equipment and services.

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V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS

Sections A.1.d, A.3.f, B.1.c and B.1.d of the QAPM establish the measures for prescribing and accomplishing activities requiring quality assurance in accordance with approved drawings, instructions, or procedures.

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VI. DOCUMENT CONTROL

Section B.14 of the QAPM establishes the measures for controlling the issuance of documents, including revisions thereto, which affect quality activities.

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VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

Section B.5 of the QAPM establishes measures to assure that purchased material, equipment and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents.

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VIII. IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS

Section B.6 of the QAPM establishes the measures for identification and control necessary to prevent the use of incorrect or defective material, parts, and components.

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IX. CONTROL OF SPECIAL PROCESSES

Section B.11 of the QAPM establishes the measures necessary to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel in accordance with applicable codes, standards, specifications, criteria and other special requirements.

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X. INSPECTION

Section B.12 of the QAPM establishes measures for inspection of activities requiring quality assurance to verify conformance with approved procedures, drawings, specifications and instructions.

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XI. TEST CONTROL

Section B.8 of the QAPM establishes the measures for a test program to demonstrate that structures, systems, and components will perform satisfactorily in service.

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XII. CONTROL OF MEASURING AND TEST EQUIPMENT

Section B.9 of the QAPM establishes the measures for the control, calibration and periodic adjustments of tools, gages, instruments, and other measuring and test devices used to verify conformance to established requirements.

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XIII. HANDLING, STORAGE AND SHIPPING

Section B.7 of the QAPM establishes measures to control the handling, storage, shipping, cleaning and preservation of material and equipment to prevent damage or deterioration.

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### XIV. INSPECTION, TEST AND OPERATING STATUS

Section B.10 of the QAPM establishes the measures for indicating the status of items undergoing inspections and tests (via tags, labels, logs, data sheets, etc.), to prevent the unintentional bypass of required tests. In addition, this section establishes measures for indicating the operating status of components and systems to prevent their inadvertent operation.

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XV. NONCONFORMING MATERIALS, PARTS, AND COMPONENTS

Sections A.6 and B.13 of the QAPM establish the measures to control materials, parts, components, or any other activities which do not conform to requirements, in order to prevent their inadvertent use.

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XVI. CORRECTIVE ACTION

Sections A.6 and B.13 of the QAPM establish measures to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment are promptly identified and corrected.

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XVII. QUALITY ASSURANCE RECORDS

Section B.15 of the QAPM establishes the measures for maintenance of records which provide documentary evidence of the quality of items and the activities affecting quality.

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XVIII. AUDITS

Sections C.1 and C.2 of the QAPM establish the measures for a comprehensive system of planned and documented audits and in-plant surveillances to verify compliance with all aspects of the Program and to assess the effectiveness of the Program.

VERMONT YANKEE NUCLEAR POWER STATION

APPENDIX A

Qualification Requirements for  
Management of Quality Assurance

Management of Quality Assurance must meet the qualification requirements provided in ANS 3.1-1978.

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APPENDIX B

Exceptions

Approved exceptions to the QAPM are contained in Table 1 of that manual, and incorporate or supercede exceptions approved under the VOQAM.

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APPENDIX C

Vermont Yankee  
Classification of Structures, Components, and Systems

| Classification of structures, systems and components is governed by UFSAR Section 1.4.2.

# VERMONT YANKEE NUCLEAR POWER STATION

## APPENDIX D

### Administrative Controls

The administrative controls related to quality assurance formerly included in Section 6 of the Technical Specifications are contained in applicable regulatory guides (RGs) and endorsed standards to which Vermont Yankee is committed, or at a level controlled by site administrative procedures, as approved in First Energy Nuclear Operating Company Safety Evaluation Report, TAC Nos. MB0914 and MB0915.