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Memorandum

NO-04-0009
May 26, 2004

TO: Quality Assurance Program Topical Report - Controlled Copy Owners

FROM: Dorothy Bruce, QAP Coordinator
Nuclear Oversight, Ext. 3185

SUBJECT: **Quality Assurance Program (QAP) Topical Report - Millstone Power Station Revision 25, Change 4 (Change 3 CORRECTION - Document No. MP-02-OST-BAP01)**

Enclosed please find additional documents that were inadvertently left out of the distribution package for Quality Assurance Program (QAP) Topical Report - Millstone Power Station, Revision 25, Change 3, which addressed several editorial/clarification QAP changes. QAP 2.0 and the Summary of Changes for Revision 25, Change 3, were inadvertently left out of the package when transmitting the package to records, and therefore were not included in the original distribution. Therefore, the Summary of Changes attached is for Revision 25, Change 3 and 4, and the attached QAP 2.0 is Change 4. This change does not included additional changes from what was first described for Revision 25, Change 3, but is a minor revision to allow proper distribution and record tracking.

Please note that the effective date of Revision 25, Change 4, was **May 24, 2004**. Please replace the current section (QAP 2.0) of the Quality Assurance Program with the enclosed section. The Abstract, Policy Statement, Introduction, QAP 1.0, and QAP Appendix G were distributed under Change 3, memo # NO-04-0008, dated May 24, 2004. If you have any questions, please contact D. Bruce at X3185.

Attachments: Summary of Changes for Revision 25, Change 3 / 4
Enclosure:
Quality Assurance Program Topical Report - Millstone Power Station, Revision 25, QAP 2.0, Change 4 (3)

DSB/dsb

Summary of Changes to QAP Rev. 25 Incorporated as Change 3 / 4

Section	Summary Description of Changes	Reference
Abstract	Modified the QAP to move the SBOQA from being delineated in program manuals and procedures to being applicable to the QAP "as identified in licensing commitments and delineated in applicable procedures"	**Request 04-03**
Policy	Modified the QAP to eliminate the SBOQA program manual and make the QAP applicable to the SBO program "as identified in licensing commitments and delineated in applicable procedures"	**Request 04-03**
Introduction	Modified the QAP to eliminate the SBOQA program manual and make the QAP applicable to the SBO program "as identified in licensing commitments and delineated in applicable procedures"	**Request 04-03**
QAP 1.0	Modified section 1.3.13, to be consistent with the Technical Specifications and allow either the HP Supervisor or the Manager – RP/Chemistry to meet the Radiation Protection Manager	**Request 04-01**
QAP 1.0	Clarifies, section 1.3.3, 1.3.20, and Figure 1.1 to be consistent with the current Supply Chain Management Organization (SCM). (Adds the word "site" to the description of SCM.)	**Request 04-02**
QAP 2.0	Modified the QAP to eliminate the SBOQA program manual and make the QAP applicable to the SBO program "as identified in licensing commitments and delineated in applicable procedures"	**Request 04-03**
Appendix G	Modified to allow either the HP Supervisor or the Manager – RP/Chemistry to meet the Radiation Protection Manager	**Request 04-01**

2.0 QUALITY ASSURANCE PROGRAM

2.1 GENERAL REQUIREMENTS

The company has established a Quality Assurance Program (QAP) for the Millstone Power Station which complies with the criteria of 10CFR50, Appendix B, and follows the regulatory documents and their endorsed ANSI/IEEE standards identified in Appendix C with exceptions as identified in Appendix E. The quality assurance requirements set forth in the attached Policy Statement, supplemented by quality assurance procedures, provide the primary basis of this program and the company's policy with regard to quality assurance for the Millstone Power Station nuclear units and ISFSI. This QAP Topical Report is established to accomplish the required level of quality in activities carried out throughout the life of the Station's operating nuclear power plants, the ISFSI and the decommissioning of Unit 1.

This QAP applies in its entirety to all activities affecting the safety-related functions of structures, systems and components of the Millstone Power Station nuclear units and the ISFSI. Safety-Related structures, systems and components for Millstone Units 2 and 3 are functionally identified in Appendix A of this QAP and are designated Category I by the company. Applicability of Appendix A to each FSAR is addressed by existing Nuclear Unit specific Design Bases and Licensing commitments, and also as specifically identified in each FSAR addressing Section 3.2.1 of Regulatory Guide 1.70. Millstone Unit 1 Safety-related structures, systems and components are defined in the DSAR. Safety Related and Important-to-Safety structures, systems and components for Millstone's ISFSI are defined in the FSAR for the Standardized NUHOMS Horizontal Modular Storage System for Irradiated Nuclear Fuel. This QAP is also applicable in its entirety to materials, equipment, parts, consumables and services designated Category I.

This QAP applies to other quality programs including Anticipated Transient Without Scram (ATWS) Quality Assurance, which is applicable to MP-2 only (MP-3 commits to Generic Letter 85-06), and to Electrical Equipment Qualification (EEQ), as defined by company commitments. ***This QAP is also applicable to Station Blackout Quality Assurance (SBOQA) as identified in licensing commitments and delineated in applicable implementing procedures.*** Portions of this QAP are also applicable to Fire Protection Quality Assurance (FPQA) and Radwaste Quality Assurance (RWQA), which are delineated in applicable procedures. .

The Materials, Equipment, and Parts List (MEPL) Program is the process used to evaluate, determine and assign the appropriate quality assurance classification (Safety related or augmented quality) to structures, systems, components, parts, materials, activities and consumables. For quality software, the Software Quality Assurance (SQA) Program provides instructions to classify software and describe the appropriate level of documentation that is warranted for software used to support those functions of structures, systems, and components that are affected by the QAP.

The requirements of this QAP are implemented by the company which operates Millstone Power Station, and their vendors performing activities affecting quality

structures, systems, and components of the Station's nuclear power plants and ISFSI.

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

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

Periodic program review of the status and adequacy of this QAP is accomplished by Nuclear Oversight audits, surveillances and inspections, by offsite review committee reviews, and by the independent review team which performs the biennial Management Quality Assurance Review described herein and in QAP 1.0, "Organization", Section 1.5. Organizations outside the company are required to review the status and adequacy of that part of this QAP for which they have been delegated responsibility.

2.2 IMPLEMENTATION

2.2.1 GOALS AND OBJECTIVES

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

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

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

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

d. Apprise the Site Vice President - Millstone and the Senior Vice President - Nuclear Operations & Chief Nuclear Officer - Dominion Nuclear Connecticut, Inc. of unresolved problems and trends which could have a significant effect on nuclear power plant and ISFSI safety.

2.2.2 PROGRAM DOCUMENTATION

This QAP defines the company's nuclear policies, goals, and objectives, and is used as guidance for the development of the various division, department, branch, or section procedures. Revisions to this QAP shall be made as needed to reflect current requirements and descriptions of activities prior to implementation. These revisions shall be made in accordance with a company Procedure.

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

Revisions which do not reduce previously accepted commitments are periodically submitted to the NRC as required by 10 CFR 50.54 (a)(3); 10 CFR 50.55 (f)(3); 10 CFR 50.71(e) and (f) and 10 CFR 72.70.

Quality procedures are developed by the departments performing quality activities. These procedures are reviewed for concurrence by the departments which are responsible for implementing portions of these procedures and are approved by the initiating department. Nuclear Oversight reviews other department quality procedures for compliance with this QAP through its audit and surveillance program. Changes to procedures are subjected to the same degree of control as that utilized in the preparation of the original document.

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

2.2.3 STRUCTURES, SYSTEMS AND COMPONENTS

This QAP applies to all activities affecting the safety-related functions of the structures, systems and components as addressed in the Safety Analysis Reports (SARs). Safety-Related structures, systems, and components are functionally identified in Appendix A for Units 2 and 3 and also as specifically identified in each FSAR addressing Section 3.2.1 of NRC Regulatory Guide 1.70. Unit 1 Safety-Related structures, systems, and components are defined in the DSAR. ISFSI Safety-Related structures, systems, and components are defined in the FSAR for the Standardized NUHOMS Horizontal Modular Storage System for Irradiated Nuclear Fuel.

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

For structures, systems and components, regulatory commitments and the company's procedures describe the measures taken to assure that the quality assurance requirements are met.

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

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

2.2.4 PARTICIPATING ORGANIZATIONS

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

Nuclear Oversight is responsible for: a) the development, coordination, and administrative control of this QAP including coordination of Nuclear Oversight procedure review and approval and b) assuring issuance of this QAP Topical Report as a controlled document (as described in QAP 6.0, 'Document Control). Procedure reviews shall be performed in accordance with QAP 5.0, "Procedures, Instructions, and Drawings".

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

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

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

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

2.2.5 INDOCTRINATION AND TRAINING

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

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

Procedures describe the nuclear training program requirements which assure that:

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

b. Proficiency of personnel performing and verifying activities affecting quality is established and maintained. Personnel proficiency is established and maintained by training, examination/testing, and/or

certification based upon the requirements of the activity. Acceptance criteria are developed to determine if individuals are properly trained and qualified;

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

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

2.2.6 MANAGEMENT PARTICIPATION

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

The Senior Vice President - Nuclear Operations & Chief Nuclear Officer - Dominion Nuclear Connecticut, Inc. assures that a management review of this QAP is conducted on a biennial basis by an independent team to assess the scope, status, implementation, and effectiveness, and to assure compliance with NRC licensing commitments. Senior Vice President - Nuclear Operations & Chief Nuclear Officer - Dominion Nuclear Connecticut, Inc. has delegated the responsibility for the management review to the Manager - Nuclear Oversight.

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

a. Review of selected procedures and documents;

b. Verification of the implementation of selected procedural requirements;

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

The Management Quality Assurance Review's findings of deficiencies and recommendations for program improvement are forwarded to the Senior Vice President - Nuclear Operations & Chief Nuclear Officer - Dominion Nuclear Connecticut, Inc. who shall assure appropriate corrective action is taken.