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Item	Facility	Type	Sub	Document Number / Title	Sheet	Revision	Doc Date	Copy #	Media	Copies
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Dominion

Memorandum

NO-05-002
May 19, 2005

TO: Quality Assurance Program Topical Report - Controlled Copy Owners
William A. Lacy
FROM: William A. Lacy, Millstone QAP Coordinator
Nuclear Oversight, Ext. 4916

SUBJECT: Quality Assurance Program (QAP) Topical Report - Millstone Power Station
Revision 26, Change 5 (Document No. MP-02-OST-BAP01)

Enclosed please find Quality Assurance Program (QAP) Topical Report - Millstone Power Station, Revision 26, Change 5. The change is to modify QAP Section 2.2.4 to properly reflect responsibilities for vendor surveillances under Dominion that were not previously modified. The change also modifies QAP Section 9.2.2 to reassign the responsibility for NDE personnel and properly reflect DNC practices, as well as changing the specific codes, specifications/standards to a more generic statement, making the wording consistent with the VEPCo QAP. Additionally, the change modifies QAP Section 12.2.2 to be consistent with standards regarding the basis for calibrations to be approved. This modification to Section 12.2.2 removes the requirement for the onsite review committee (SORC) to perform this approval.

Please note that the effective date of Revision 26, Change 5, is May 23, 2005. Please replace the current sections of the Quality Assurance Program Topical Report with the enclosed sections (QAP 2.0, QAP 9.0, and QAP 12.0).

If you have any questions, please contact W. Lacy at X4916.

Attachments: Summary of Changes for Revision 26, Change 5

Enclosure:

Quality Assurance Program Topical Report - Millstone Power Station, Revision 26, Change 5

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Summary of Changes to QAP Rev. 26 Incorporated as Change 5

<u>Section</u>	<u>Summary Description of Changes</u>	<u>Reference</u>
QAP 2.0	<p>Modifies Section Page: 1 2.2.4 to properly reflect responsibilities for vendor surveillance under Dominion that were not appropriately modified when Duke Engineering Services was relieved and Innsbrook NOD Vendor group took over the responsibilities. Page: 1 Also clarifies this section to use current Dominion terminology, thus eliminating the word "audit" for responsibilities performed by Supply Chain Management.</p>	Request 05-02
QAP 9.0	<p>Modifies Section 9.2.2 to reassign the responsibility for NDE personnel and properly reflect DNC practices. Page: 1 In addition, the specific code/standard was changed to a more generic statement, allowing the current codes, specifications and standard to be used without changing the QAP, and making the wording consistent with the VEPCo QAP.</p>	Request 05-03
QAP 12.0	<p>Modified Section 12.2.2 to be consistent with standards regarding the basis for calibrations to be documented. (No standard required authorization by the onsite review committee.) Therefore the clause "and authorized by the onsite review committee was removed from this sentence. (It was previously removed from the last sentence of this paragraph, and it appears it may have been left here as an oversight."</p>	Request 05-04

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 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. Nuclear Oversight 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 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.

9.0 CONTROL OF SPECIAL PROCESSES

9.1 GENERAL REQUIREMENTS

This QAP provides measures to assure the control of special processes associated with quality structures, systems, and components of the Millstone Power Station nuclear units and ISFSI by the use of qualified procedures, equipment and personnel.

Special processes are performed under controlled conditions in accordance with special requirements and may include, but are not limited to: welding, cleaning, heat treating, and nondestructive examination and/or testing.

9.2 IMPLEMENTATION

During quality activities performed for the Station's nuclear power plants or ISFSI, the responsible engineer assures that special process data and documentation is reviewed, and that vendor special process procedures utilized for the Station nuclear power plants or ISFSI are qualified and approved, and that personnel and equipment utilizing special processes are properly qualified prior to start of work. Audits, surveillances, and inspections are performed, as appropriate to verify that these vendors are effectively complying with their quality assurance program requirements for control of special processes.

The company special process procedures utilized during quality activities for the Station nuclear power plants or ISFSI are prepared, reviewed and approved in accordance with procedures as specified in QAP 5.0, "Procedures, Instructions, and Drawings".

9.2.1 PROCEDURE QUALIFICATION AND CONTROL

The company procedures specify that written process control documents are utilized and qualified, as required, in accordance with the applicable specification, codes or standards.

9.2.2 PERSONNEL QUALIFICATION AND CERTIFICATION

Codes, standards and the company procedures specify personnel qualification/certification requirements. Personnel responsible for the performance and verification of special processes are trained, tested, and certified as required by applicable specifications, codes and standards. Requirements for the period of certification, examinations, and certification renewal of personnel are also specified. Vendors qualify personnel and maintain records of qualified personnel in accordance with applicable codes, standards, specifications, and vendor purchase order/contract requirements.

The department that is contracting services is responsible for the review of records of qualified personnel, equipment and procedures associated with special processes. Supply Chain Management (SCM) or Nuclear Oversight shall provide an oversight function via audits, surveillances, or inspections, as appropriate.

Nuclear Engineering is responsible for assuring the training, testing, and certification of all the Millstone Power Station NDE personnel is in accordance with the applicable codes, specifications and standards.

9.2.3 SPECIAL PROCESS RECORDS

Records provide objective evidence that special processes were performed in accordance with applicable procedures, by qualified personnel, and that when required by procedures, specifications and codes, such performance was verified. Results of nondestructive examinations are recorded in accordance with applicable specifications, codes and standards. These records are retained by the vendor or supplied to the company as required by contract or purchase order. If records are to be retained by the vendor, the contract or purchase order specifies the retention period and instruction for final disposition of records.

Special process documentation such as special process procedures, qualifying data, and personnel and equipment qualification records associated with the performance of special processes at Station nuclear power plants or ISFSI, are kept current and maintained in appropriate company records retention facilities.

12.0 CONTROL OF MEASURING AND TESTING EQUIPMENT

12.1 GENERAL REQUIREMENTS

This QAP provides measures for the control of measuring and testing equipment (M&TE) used as the basis for acceptance during inspection, testing, and measurement of materials, equipment, and parts affecting quality structures, systems, and components. Periodic calibration and adjustment of M&TE is performed and controlled to assure accuracy is maintained within limits necessary to verify that design and operating condition requirements have been met. Documentation is retained such that all items of M&TE are traceable to their calibration records.

12.2 IMPLEMENTATION

12.2.1 CALIBRATION PROGRAM

Procedures delineate the methods and responsibilities for the control, maintenance and calibration of M&TE including portable and temporarily installed instruments, tools, gages, fixtures, reference and transfer standards, and nondestructive test equipment.

Documentation associated with the calibration of all M&TE is maintained in appropriate files and retained as quality records in accordance with the company's Records Management Program. When the information for the control, use, and calibration of M&TE is in electronic form, this information is controlled and protected in accordance with applicable procedures.

The calibration program is implemented in accordance with the requirements defined in company procedures which describe the measures utilized to maintain the calibration of the M&TE. Functional groups are responsible for implementing these procedures which comply with the requirements contained in specifications and drawings. Procedures related to the M&TE calibration program are reviewed and approved by the appropriate on-site review committee or the Station Qualified Reviewer Program, as defined in applicable procedures. Supply Chain Management (SCM) or the appropriate M&TE custodian, as delineated by the purchase order, is responsible for verifying that receipt of calibrated equipment is in conformance with the requirements of procurement documents. Supply Chain Management (SCM) and Nuclear Oversight are responsible for control of calibrated M&TE used during their inspections.

Department heads/job supervisors are responsible to assure that M&TE is calibrated, issued, and controlled in accordance with the requirements of applicable procedures.

Nuclear Oversight performs audits, surveillances, and inspections, as appropriate, to verify implementation of the calibration program.

Vendors utilized to perform quality activities for the Station nuclear power plants or ISFSI are responsible for implementing measures for the control of M&TE to assure the M&TE are properly calibrated, adjusted and maintained at specified intervals in order to maintain accuracy within required limits. Audits, surveillances, and

inspections, are performed, as appropriate, to verify these vendors are effectively complying with their quality assurance program requirements for control of M&TE.

12.2.2 CALIBRATION STANDARDS

Measuring and test equipment is calibrated at specified intervals based on the required accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurement. Measuring and test equipment shall be permanently marked or tagged with a unique identification number and the date calibrated and next calibration date indicated on the M&TE.

Procedures describe the measures taken to assure that reference and transfer standards are traceable to nationally recognized standards and that, where national standards do not exist, provisions are established to document the basis for calibration.

Calibration of this equipment should be against standards that have an accuracy of at least four times the required accuracy of the equipment being calibrated. When this is not possible, the standards shall have an accuracy that assures the equipment being calibrated shall be within required tolerance and the basis of acceptance is documented. In addition, the calibrating standards shall have greater accuracy than secondary standards being calibrated. Calibrating standards with the same accuracy may be used if they can be shown to be adequate for the requirements and the basis of acceptance is documented.

12.2.3 "OUT OF TOLERANCE" CONTROL

M&TE and reference standards when found out of tolerance are so identified and removed from service. A timely review is conducted to determine the validity of previous inspection or test results gained through use of the instrument, and of the acceptability of items previously measured or tested. Where it is determined that use of out of tolerance measuring and test equipment may have resulted in a condition adverse to quality, the condition is promptly identified and corrective action is implemented in accordance with QAP 15, "Nonconforming Materials, Parts, Components or Services" and QAP 16, "Corrective Action" respectively as appropriate.