



CONNECTICUT YANKEE ATOMIC POWER COMPANY

HADDAM NECK PLANT
362 INJUN HOLLOW ROAD • EAST HAMPTON, CT 06424-3099

JUL 25 2006
CY-06-097
Docket No. 50-213

Re: 10 CFR 50.54(a)

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D. C. 20555-0001

Haddam Neck Plant
Revision to the
Quality Assurance Program (QAP)

In accordance with 10 CFR 50.54(a)(4), Connecticut Yankee Atomic Power Company (CYAPCO) is submitting a revision (proposed change to Revision 7) to the Quality Assurance Program (QAP) for the Haddam Neck Plant (HNP) for your review and approval. The proposed change provides for additional flexibility in the selection of Independent Safety Review (ISR) personnel.

On December 20, 2005, CYAPCO submitted a revision to the Connecticut Yankee Quality Assurance Program (CYQAP) that involved a complete revision and replacement of the existing CYQAP. As permitted by 10 CFR 50.54(a)(4)(iv), the revision (Revision 7) was implemented on March 7, 2006 (i.e., 60 days after the date of CYAPCO's request of December 20, 2005) and continues to satisfy the criteria of Appendix B to 10 CFR 50 and the Quality Assurance requirements of 10 CFR 71 and 10 CFR 72. During that revision, the statement related to equivalent qualification in accordance with ANSI 18.1-1971 was inadvertently omitted. This omission resulted in a restricted qualification requirement for ISR personnel. This proposed change will restore the original flexibility provided by the use of the ANSI standard as means for qualification of ISR personnel.

The proposed change (Revision 8) of the QAP is provided in Attachment 1. As required by 10 CFR 50.54(a)(4)(ii), Attachment 2 provides a discussion of the change to the existing program (QAP, Revision 7), identifies any changes considered to be a reduction in commitment, and provides a basis for concluding the program, as changed, continues to meet the criteria of Appendix B to 10 CFR 50, and the Quality Assurance requirements of 10 CFR 71 and 10 CFR 72.

DMSSol

In accordance with 10 CFR 50.54(a)(4)(iv), CYAPCO will implement proposed change (Revision 8) to the QAP upon approval by the NRC or after 60 days from the date of this letter.

There are no regulatory commitments contained within this letter.

If you should have any questions regarding this submittal, please contact me at (860) 267-3938.

Sincerely,



G. P. van Noordennen
Director of Nuclear Safety and Regulatory Affairs

7-25-06
Date

Attachments:

1. Proposed Change (Revision 8) to the Quality Assurance Program (QAP).
2. Description and Justification of the Proposed Change to the Quality Assurance Program (QAP)

cc: Mr. S. J. Collins, NRC, Region 1 Administrator
Ms. M. T. Miller, Chief, Decommissioning Branch, NRC
Region 1
Mr. T. B. Smith, NRC, Project Manager
Dr. E. L. Wilds Jr., CT DEP, Director, Radiation Division

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Attachment 1

Haddam Neck Plant
Proposed Change (Revision 8) to the Quality Assurance Program (QAP).

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QUALITY ASSURANCE PROGRAM FOR THE HADDAM NECK PLANT

- c. A master's degree in engineering or business management is considered equivalent to two years of experience.
- 2. The position of Radiation Protection Manager shall meet the following minimum qualifications:
 - a. Academic degree in an engineering/science field or equivalent as provided for in paragraph c, below.
 - b. Minimum of five years professional experience in the area of radiological safety, three years of which shall be in applied radiation work in a nuclear facility.
 - c. Technical experience in the area of radiological safety beyond the five year minimum may be substituted on a one-for-one basis towards the academic degree requirement (four years of technical experience being equivalent to a four year academic degree).
 - d. Academic and technical experience must total a minimum of nine years.
- 3. The position of Independent Safety Reviewer (ISR), shall meet the following minimum qualifications:
 - a. Knowledgeable of the regulatory requirements and operational aspect of an ISFSI.
 - b. Bachelor's Degree in Engineering or the Physical Sciences, *or shall have equivalent qualifications in accordance with*
 - c. Knowledge in the subject areas requiring review. *ANSI 18.6-1971.*
 - d. At least 5 years of professional experience.

The ISFSI Manager shall evaluate each potential reviewer's qualifications and document the appointment of a reviewer(s) based on their qualifications.

6. Corrective Action

- a. Each individual working at CYAPCO is responsible for promptly identifying and reporting conditions adverse to quality. Management at all levels encourages the identification of conditions that are adverse to quality.
- b. The corrective action program will ensure the prompt identification, documentation, and correction of conditions adverse to quality. Significant conditions adverse to quality shall require cause determination and a corrective action plan that should prevent or lessen the likelihood of recurrence.

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Attachment 2

Haddam Neck Plant
Description and Justification of the Proposed Change to the Quality Assurance
Program (QAP)

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Haddam Neck Plant
Description and Justification of the Proposed Change to the Quality Assurance
Program (QAP)

The purpose of this attachment is to evaluate the change to the Quality Assurance Program (QAP), Revision 7 to determine if the proposed change requires prior NRC approval pursuant to the requirements of 10 CFR 50.54(a)(3).

Description of the Change:

The proposed change to the QAP, Revision 7 (Attachment 1) provides additional flexibility in selection of Independent Safety Reviewer (ISR) personnel.

The QAP, Revision 6 and previous Revisions provided the qualification requirements for an Independent Safety Reviewer (ISR). (QAP, Appendix E, Section 1.1.b). Specifically, it required, "Independent Safety Reviewers shall have at least 5 years of professional experience and either a Bachelor's Degree in Engineering or the Physical Sciences or shall have equivalent qualifications in accordance with ANSI 18.1-1971". During a revision (Revision 7) to the QAP, the statement related to equivalent qualification in accordance with ANSI 18.1-1971 was inadvertently omitted. This omission resulted in a restricted qualification requirement for an ISR. The QAP, Revision 8.0 has been processed in order to implement a change to restore the original flexibility in accordance with the ANSI standard as means for qualification of ISR personnel. Specifically, paragraph A.5.3.b states that the ISR qualification requires a "Bachelors degree in Engineering or Physical Sciences". This statement is being amended to add "or shall have equivalent qualifications in accordance with ANSI 18.1-1971". As stated above, this requirement was contained in the previous QAP revisions. This change will provide additional flexibility in the selection of ISR personnel.

Evaluation

The proposed change was part of the previously NRC approved QAP. Based on past records, there were no unacceptable situations or conditions related to the equivalency requirements for the ISR qualification. Therefore, reinstating this requirement in the QAP will have no adverse impact to the QAP.

Determination of Impact

This change does constitute a reduction in commitment from the previously approved QAP and does require submittal to the NRC for review prior to implementation. This change is considered an acceptable method of qualification previously accepted by the NRC.

No adverse impact to the QAP will result due to these changes.

Conclusion

Based on the results of this evaluation, the change proposed for Revision 8.0 does reduce the level of commitment in the QAP and may not be implemented without prior NRC approval. However, the QAP will continue to satisfy the criteria of Appendix B to 10 CFR 50 and the Quality Assurance requirements of 10 CFR 71 and 10 CFR 72. Therefore, the proposed change is safe and acceptable.