NMPC-FPQAP-1

FIRE PROTECTION QUALITY ASSURANCE PROGRAM NINE MILE POINT

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Niagara Mohawk Power Corporation
Syracuse, New York

NIAGARA MOHAWK POWER CORPORATION

FIRE PROTECTION
QUALITY ASSURANCE PROGRAM
NINE MILE POINT

SUMMARY OF CHANGES

Refer to Attachment #1 (Pgs. iiii & v)

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INTRODUCTION AND SCOPE

The Niagara Mohawk Power Corporation Fire Protection Program is comprised of Operations Phase administrative controls and quality assurance provisions established to comply with applicable requirements of General Design Criterion 3 of Title 10, Code of Federal Regulations, Part 50, Appendix A. Components or portions of Fire Protection systems that are designated safety-related are subject to the requirements of the Quality Assurance Topical Report (NMPC-QATR-1). All other Fire Protection system elements are subject to appropriate requirements of this FPQA Program. Equipment subject to the FPQA Program is identified in the Final Safety Analysis Report and Technical Specifications for each unit as detailed in Attachment 1, Fire Protection Systems Definitions.

This Fire Protection Quality Assurance Program (FPQAP) fulfills the Quality Assurance criteria discussed in Branch Technical Position CMEB 9.5.1, dated August 23, 1976 for Unit 1, and as outlined in Appendix 9A of the Unit 2 FSAR, ensuring that the guidelines for design, procurement, installation and testing, and the administrative controls for the fire protection systems for safety related areas of the plant are satisfied. It applies to organizations involved in performing and monitoring these activities.

Responsibilities for performance of specific functions related to fire protection are described in Section I of this program. Basic procedures utilized by each participating department to implement the Fire Protection Program are identified in Addendum I to the controlled distribution of ANSI/ASME NQA-1 and ANS-3.2 Programs Implementation Matrices.

In the event of conflict between this document and related commitments contained in the NMPC Quality Assurance Topical Report (QATR-1) or the Nine Mile Point Units 1 and 2 FSAR's the latter shall take precedence.

QUALITY ASSURANCE POLICY

PURPOSE: The purpose of this policy is to summarize the Company's position governing Quality Assurance responsibilities and accountabilities.

POLICY: The Company policy regarding Quality Assurance matters is that:

1. Organizations with quality-affecting responsibilities shall be structured, managed and operated in compliance with approved Quality Assurance Programs, procedures and instructions in direct support of generation, transmission and distribution projects and operations to achieve the following objectives:

   - To strive to perform assigned work correctly the first time.
   - To provide facilities which are designed, constructed, tested and operated to high standards of excellence, with high assurance against failure or malfunctions, and without undue risks to the health and safety of the public.
   - To ensure early and timely identification and resolution of actual and potential problem areas in design, procurement, construction, testing, operations, maintenance and modification of facilities.
   - To comply effectively with government regulations and established NMPC policies and procedures, applying a systematic, disciplined and uniformed approach to Quality Assurance.

2. Accountability for the quality of generation, transmission and distribution structures, systems, components and services rests with the organizations and persons performing the quality attaining functions of design, construction and operation.

3. Accountability for determining that the generation, transmission and distribution structures, systems, components and services do, in fact, meet the stated requirements rests with the organizations and persons performing quality verification functions, such as design review, document review, inspection, surveillance and audits.

AUTHORIZED:	James A. Perry	QA.	6/17/88
	Signature	Department	Date
APPROVED:	E. M. Edrus		4/18/88
	President		

Summary of Changes
NMPC Fire Protection Quality Assurance Program
FPQAP, Revision 2

NOTE: Section 1.0, Organization revised/restructured to reflect the current Nuclear Division Organization.

Page ii	-	Revised to clarify which items are subject to the requirements of the NMPC-QATR-1.
Page ii	-	Updated reference to branch technical position.
Page iii	-	Re-signed Quality Assurance Policy.
Page 1, Para. 1.1	-	Changes fire brigade to department.
Page 1, Para. 1.2	-	Changed title to Executive Vice President - Nuclear Operations.
Page 1,2 Para. 1.2.A,.1,.2, .3,.4	-	Revises section to reflect current organization and responsibilities.
Page 2, Para. 1.2.A.5	-	Adds the Site Fire Program Coordinator - Nuclear and responsibilities.
Page 2,3 Para. 1.2.A.6	-	Adds Supervisor - Operations support and associated responsibilities.
Page 3, Para. 1.2.A.7	-	Clarifies responsibilities.
Page 4, Para. 1.2.B	-	Changed title to "Vice President - Nuclear Engineering/Licensing".
Page 4, Para. 1.2.B.a	-	Added selected personnel under the direction and guidance of a Fire Protection Engineer (qualified).
Page 4, Para. 1.2.B.b	-	Changed Fire Protection Engineer to selected personnel under the direction and guidance of a Fire Protection Engineer (qualified).
Page 5, Para. 1.2.B.1	-	Added, (qualified) shall provide direction and guidance to selected personnel assigned to...
Page 5, Para. 1.2.B.2	-	Adds Manager - Nuclear Consulting Services and associated responsibilities.
Page 5 & 6, Para. 1.2.B.2.a	-	Adds Fire Protection Program - Manager and associated responsibilities.
Page 7, Para. 1.2.C.1.b	-	Adds inspection plans to Supervisor - Quality Engineering/Control responsibility.

Summary of Changes
NMPC Fire Protection Quality Assurance Program
FPQAP, Revision 2

(Continued)

Page 7, Para. 1.2.C.2	-	Adds Manager - Corporate Quality Assurance and associated responsibilities.
Page 7, Para. 1.2.C.2.b	-	Adds Supervisor - Quality Assurance Services and associated responsibilities.
Page 7, Para. 1.2.C.3.a	-	Revised to reflect current responsibilities.
Page 8, Para. 1.2.E	-	Adds commercial to description of duties.
Page 8, Para. 1.2.F	-	Changed title to Program Director - Nuclear Materials Management.
Page 8, Para. 1.2.H	-	Clarified supervisors responsibilities.
Page 9, Matrix	-	Deletes QA's primary responsibility for instructions, procedures, and drawings.
Page 10, Para. 2.3	-	Adds Nuclear to Materials Management Department title.
Page 11, Para. 3.5,	-	Second sentence revised for clarity. Added, selected personnel under the direction and guidance of...(qualified)...personnel.
Page 12, Para. 4.0	-	Adds applicability of FPQA and requirements to indicate on procurement documents that FPQAP applies.
Page 14, Para. 6.3	-	Adds inspection responsibilities.
Page 15, Para. 7.0	-	Adds control of materials to responsible departments based on possession.
Page 16,17, Para. 8.1	-	Deleted repetitive inspection criteria.
Page 18, Figure 8-1	-	Adds receipt inspection responsibility.
Page 25, Para. 15.2	-	Revised for clarity.

1.0 ORGANIZATION

1.1 POLICY

Niagara Mohawk Power Corporation (NMPC) is responsible for establishing and implementing a Fire Protection Program for Nine Mile Point Nuclear Station. This program encompasses the following:

- o System and facility design.
- o Fire prevention, detection, confinement and suppression.
- o Annunciation.
- o Administrative controls and fire department organization.
- o Inspection, maintenance, modification and housekeeping.
- o Training, quality assurance and testing.

This section of the FPQAP identifies NMPC organizations responsible for activities involving the design, procurement, installation, testing, and for the development and implementation of administrative controls affecting the operation, maintenance and modification of Fire Protection Systems. The following paragraphs reflect the division of responsibility, consistent with the Fire Protection Program described in Administrative Procedure AP-3.5, Fire Protection Program. Organizational interfaces are as defined in Section 1.0 of the NMPC Quality Assurance Topical Report QATR-1. Departmental responsibilities are summarized in the Responsibility Matrix, Figure 1.1

1.2 IMPLEMENTATION

The Executive Vice President - Nuclear Operations has management responsibility for the formulation, implementation, and assessment of the effectiveness of the Nuclear Plant Fire Protection Program.

A. The General Superintendent - Nuclear Generation shall have the overall responsibility for the Fire Protection Program at the Nine Mile Point Site.

1. The Station Superintendents, Unit 1 and Unit 2, are functionally responsible for fire protection for their respective plants.

2. The Site Superintendent Maintenance - Nuclear shall ensure fire fighting equipment, systems, and fire barrier integrity for each unit is maintained by performance of maintenance and modifications, as required.

3. The Technical Superintendent - Nuclear is responsible for overall administration and technical direction for the Fire Protection Program.

1.2. IMPLEMENTATION (CONTINUED)

A. (continued)

4. The Superintendent Training - Nuclear ensures that Fire Department personnel are scheduled to attend the required fire training sessions and ensure that the required fire drills are performed. In addition, they are responsible for any necessary fire protection training of operating station or contractor personnel.

5. The Site Fire Program Coordinator - Nuclear shall provide technical support to unit fire departments for routine daily matters and to support special investigations and projects:

   a. Act as the site contact for Fire Protection matters, such as American Nuclear Insurance (ANI) audits, NRC inspections NMPC QA ,and Risk Management audits.

   b. Act as liaison between Corporate Risk Management, Site Fire Protection Engineer and Fire Protection personnel.

   c. Consult with the Fire Protection Program Manager for interpretations of adequacy on issues concerning compliance with regulatory and/or Fire Protection Program requirements.

   d. Ensure Fire Protection System support is maintained at both units for operation, impairment tracking, and modification.

   e. Evaluate Fire Protection System trend data and provide recommendations for corrective actions, as necessary.

   f. Ensure input into the Operating Experience Assessment (OEA) Program for matters concerning Fire Protection.

6. The Supervisors - Operations Support shall direct the Unit Fire Department's day-to-day activities associated with the implementation of the Fire Protection Program.

   a. Consult with the Fire Program Coordinator for interpretations of adequacy on issues concerning compliance with regulatory and/or Fire Protection Program. requirements.

1.2 IMPLEMENTATION (CONTINUED)

A. (continued)

6. b. Direct investigations into fires at the unit, review the determination of cause, and recommend corrective action, as appropriate.

c. Ensure that training is established and scheduled in accordance with program requirements.

d. Evaluate the effectiveness of Fire Protection training.

e. Direct the inspection and testing of Fire Protection Systems and equipment in accordance with applicable procedures.

f. Ensure a review of inspection and test results is conducted to maintain compliance with Technical Specifications and/or Licensing Requirements.

g. Ensure that negative performance trends on Fire Protection Systems and equipment are reported to the Fire Program Coordinator.

7. The Unit Supervisors - Fire Protection shall:

a. Coordinate scheduling of required training, and fire protection training drills for stations operating and off-site fire support personnel.

b. Conduct periodic inspection to assess compliance with the Station Fire Protection Program, and ensure unit Fire Protection System/equipment operability.

c. Ensure Fire Protection related FSAR and Technical Specification surveillances are performed.

d. Evaluate proposed work activities, as required and maintain an awareness of the status of repairs, modifications, or other work affecting Fire Protection systems and equipment.

e. Ensure notification of Fire Insurance Carrier (ANI) and NMPC Risk Management is performed when Unit Fire Protection System impairments occur, as required.

1.2 IMPLEMENTATION (CONTINUED)

B. The Vice President - Nuclear Engineering and Licensing has overall responsibility for the design and evaluation of fire protection components and systems and also periodically assessing through the Safety Review and Audit Board (SRAB), the effectiveness of the Fire Protection Program for Nine Mile Point Nuclear Station. Specific actions include:

a. Review of modifications to plant systems by selected personnel under the direction and guidance of a Fire Protection Engineer (qualified) for impacts to the site Fire Protection Program.

b. Designing modifications to Fire Protection systems in accordance with nationally recognized standards. In addition, assessment of impacts to Final Safety Analysis Report (FSAR) commitments, Fire Hazards Analyses and Nuclear Regulatory Commission Safety Evaluation Reports. Evaluation of deviation impact is performed by selected personnel under the direction and guidance of a Fire Protection Engineer (qualified).

c. Identification and evaluation of proposed changes to the program or systems which impact licensing prior to the change being made.

d. Identification and resolution of deviations from the program in a timely manner.

e. Development of inspection attributes for Fire Protection equipment.

f. Provision of support in resolution of deficiencies identified within the Fire Protection Program.

g. Development of testing requirements meeting applicable codes for system changes.

h. Definition and maintenance of design records required to support the Fire Protection Program.

i. Development and maintenance of a list identifying contractors qualified to perform fire protection work.

1.2 IMPLEMENTATION (CONTINUED)

B. (continued)

1. A Fire Protection Engineer (qualified) shall provide direction and guidance to selected personnel assigned to evaluate activities and identified deficiencies to the Fire Protection Program for impacts to NMPC/NRC program documentation, determine path for resolution of open items or questions, review inspection attributes for Fire Protection equipment, provide guidance in Fire Protection System Design Changes, recommend program improvements as required and participate in program evaluation on a periodic basis (audit).* A Fire Protection Engineer (qualified) is defined as an individual who is a graduate of an engineering curriculum of accepted standing and has completed not less than six years of engineering attainment indicative of growth in engineering competency and achievement, three years of which shall have been in responsible charge of fire protection engineering work.

2. Manager - Nuclear Consulting Services assigns a Fire Protection Program Manager, and ensures audits are conducted per the Fire Protection Program Description.

   a. Fire Protection Program - Manager provides organization, direction, and guidance concerning the implementation of the Fire Protection Program, and the approach to be taken regarding fire protection issues as they relate to the overall performance and adequacy of the Nuclear Fire Protection Program.

      1. Maintain cognizance of regulatory positions and trends, determine adequacy/sufficiency of programs to satisfy regulatory and program requirements and commitments, and develop programs to resolve deficiencies, insure auditability and implement corrective actions to maintain acceptable levels of fire protection within the nuclear facilities.

      2. Coordinate regulatory response and provide program interpretation for Fire Protection issues and identify potential Fire Protection modification requirements.

* Reference NRC Generic Letter 82-21, "Generic Scope of Fire Protection Audits and Composition and Qualifications of Auditors", for guidance regarding audit team participation.

1.2 IMPLEMENTATION (CONTINUED)

B. (continued)

3. Coordinate the prioritization of identified Fire Protection work items.

4. Coordinate with appropriate training departments to ensure that required training levels are established for personnel performing Fire Protection Engineering activities.

5. Interface and coordinate with the Fire Program Coordinator regarding matters that impact Site Fire Protection.

6. Provide an overview function to:

   a. Periodically review Fire Protection Engineering Evaluations, Appendix R reviews and Fire Protection reviews.

   b. Ensure that NMPC interpretations of regulatory documents and corporate policy are being applied properly and consistently.

   c. Ensure Corporate Fire Protection philosophy/requirements are transmitted to Nuclear engineering and that they are implemented in design changes.

C. The Vice President - Quality Assurance has overall responsibility for formulating, administering and verifying the effectiveness of the Fire Protection Quality Assurance Program for Nine Mile Point through review, surveillance and audits.

1. The Manager - QA Nuclear Operations directs activities of the QA Operations Surveillance Supervisor and the Supervisor Quality Engineering/ Control related to assigned Fire Protection responsibilities.

   a. The Supervisor - QA Operations Surveillance is responsible for planning, scheduling and conducting surveillance of Fire Protection Operational and Maintenance Inspections and Tests, Installation Contractors Inspection activities, and other scheduled and unscheduled plant fire protection activities, as appropriate.

1.2 IMPLEMENTATION (CONTINUED)

C. 1. (continued)

b. The Supervisor - Quality Engineering/Control is responsible for preparing inspection plans in conjunction with a Fire Protection Engineer and planning, scheduling and conducting inspections related to Fire Protection activities as required in Section 6 and 8 of this program.

2. The Manager - Corporate Quality Assurance directs the QA Audits Supervisor and QA Services Supervisor in the performance of their responsibilities.

a. The Supervisor - Quality Assurance Audits is responsible for planning, scheduling and coordinating audits of the Fire Protection Program.

b. The Supervisor - Quality Assurance Services is responsible for preparing and controlling the Fire Protection Quality Assurance Program (FPQAP-1).

3. The Manager - Quality and Reliability Engineering directs activities of the Supervisor, Quality Assurance Engineering; Supervisor, Procurement Quality and Reliability Engineering; and Supervisor, Materials Quality Engineering in support of the Fire Protection Program.

a. The Supervisor - Quality Assurance Engineering is responsible for reviewing specifications, procurement documents and installation inspection plans.

b. The Supervisor - Procurement Quality and Reliability is responsible for providing support in supplier qualification activities.

c. The Supervisor - Materials Quality Engineering is responsible for providing support in resolution of issues related to materials selection and utilization.

D. The Risk Management Department has responsibility for assuring adequate fire protection for company facilities and fire personnel training; to verify appropriate measures are taken to prevent or limit losses from any perils resulting from Nuclear Operations; and for all matters relating to insurance of our facilities.

1.2 IMPLEMENTATION (CONTINUED)

E. The Manager - System Purchasing has overall responsibility for preparation, issuing and commercial administration of Purchase Orders for materials and services in support of Fire Protection Program requirements.

F. The Program Director - Nuclear Materials Management has overall administrative and functional responsibility for procedures used for receipt, storage and handling of materials employed in implementing the Fire Protection Program.

G. The Manager - Meter and Laboratory facilities is responsible for maintaining a facility for calibrating reference standards and for calibration and maintenance of portable measuring and test equipment (M&TE).

H. Supervisors shall ensure that their department(s) observe(s) good safety practices in the use and control of combustible materials and processes which may serve as an ignition source, in addition to good housekeeping practices, each supervisor shall ensure that activities are carried out in a manner that does not endanger essential station equipment, cabling, piping or instrumentation necessary for safe operation of the station.

FIRE PROTECTION QUALITY ASSURANCE PROGRAM RESPONSIBILITY MATRIX

REQUIREMENT		NMPC DEPARTMENT						
Branch Technical Position 9.5.1	FPQAP Sect.	NG	NE	PUR	MM	ML	QA	RM
Organization	1.0	P	P	P	P	P	P	R
Quality Assurance Program	2.0	S	S	S	S	S	P,R	R
a. Design and Procurement Document Control	3.0 4.0	P	P	S	P		S,R	R
b. Instructions Procedures and Drawings	5.0	P	P	P	P	P	R	R
c. Control of Purchased Material, Equipment and Services	6.0 7.0	P	P	S	P		S,R	R
d. Inspection (Also see Figure 8.1)	8.0 10.0	P	S		S		P,R	R
e. Test and Test Control	9.0 10.0	P	P		S	S	R	R
f. Inspection, Test and Operating Status	11.0 10.0 7.0	P	S				P,R	R
g. Nonconforming Items	12.0	P	P	S	S	S	P,R	R
h. Corrective Action	13.0	P	P	S	S	S	P,R	R
i. Records	14.0	P	P	S	S	S	P,R	R
j. Audits	15.0	P	P				P	R

NMPC DEPARTMENT
NG - Nuclear Generation
NE - Nuclear Engineering
PUR - Purchasing
MM - Materials Management
ML - Meter and Laboratory Facilities
QA - Quality Assurance
RM - Risk Management

PROCEDURE COVERAGE REQUIRED
P - Primary Responsibility
S - Support Responsibility
R - Review, Audit or Surveillance Responsibility

Figure 1.1

2.0 QUALITY ASSURANCE PROGRAM

2.1 The Fire Protection QA Program, under the administration of the NMPC QA organization uses a graded approach to apply appropriate criteria from 10CFR50, Appendix B, to Fire Protection systems or activities.

2.2 The FPQAP includes policies, procedures, instructions and other documents that implement the provisions of this document, and provides for the performance of Fire Protection activities under suitably controlled conditions. These conditions include the preparation and use of procedures, use of appropriate equipment, maintenance of proper environmental conditions, assignment of appropriately qualified personnel and assurance that applicable prerequisites have been met.

2.3 Departmental procedures specify the methods and controls for implementing the Fire Protection Program requirements. These include:

- Nuclear Generation Department - Nine Mile Point Nuclear Station Administrative Procedures
- Nuclear Engineering and Licensing Department - Engineering Procedures
- Purchasing Department - Purchasing Procedures
- Nuclear Materials Management Department - Nuclear Materials Management Procedures
- Meter and Laboratory Facilities Department - Calibration Procedures
- Quality Assurance Department - Quality Assurance Procedures

3.0 DESIGN CONTROL

3.1 General

Design control for fire protection systems, equipment and components that are not classified as safety-related shall be performed in accordance with this document.

3.2 Design Information

Design information (such as drawings, specifications and standards) shall be maintained to ensure that items are fabricated, inspected and tested to the applicable requirements.

3.3 Modification Control

Design document changes, including field changes and design deviations, shall be subject to the same level of control, review, and approval that was applied to the original design document. Modifications shall be performed in accordance with the current plant modification program.

3.4 Design Documents

Quality standards shall be specified in the design documents. Appropriate fire protection codes and standards shall be referenced. Deviations and changes from these quality standards shall be controlled, and require approval of the specifying organization.

3.5 New Designs and Plant Modifications

All new designs and plant modifications shall be controlled and reviewed by qualified personnel to assure inclusion of appropriate fire protection requirements. Review shall involve selected personnel under the direction and guidance of a Fire Protection Engineer (qualified) and Quality Assurance Personnel in accordance with implementing procedures.

4.0 PROCUREMENT DOCUMENT CONTROL

Procurement documents shall specify the applicable regulatory and industry codes and standards, the necessary design, test, inspection and documentation requirements and any other special requirements necessary to assure the quality of items or services procured.

The user or requisitioner shall ensure procurement documents or any changes thereto, are reviewed for adequacy of Fire Protection requirements, applicability of FPQA, and approved in accordance with appropriate procedures.

The user or requisitioner shall indicate on the procurment documents that FPQAP applies.

5.0 INSTRUCTIONS, PROCEDURES AND DRAWINGS

Inspections, tests, administrative controls, fire drills and training required by the Fire Protection Program shall be accomplished in accordance with current approved instructions, procedures or drawings by personnel designated by the relevant document.

6.0 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

6.1 General

Adequate control over procurement sources shall be maintained. This control shall be maintained for those products or services which are unique to the Fire Protection Program as follows:

- The Procurement product is listed by a nationally recognized testing laboratory such as Underwriters Laboratories or Factory Mutual. The procurement document will indicate this requirement. In the event a product is not so listed, an Engineering determination for acceptance shall be made.

- Procurement sources shall be chosen from the Fire Protection Qualified Contractors List (FPQCL). The list shall be prepared and managed by qualified Fire Protection personnel in the Engineering Department. Changes to the list shall be initiated through the use of Attachment 2, Request for Qualification of Fire Protection Contractors.

Quality Assurance shall review the purchase requisition to assure the selected vendor is on the Fire Protection Qualified Contractors List.

All changes to procurement documents shall be processed in a manner commensurate with that used for the original.

6.2 Source Inspection

The NMPC Quality Assurance Department shall perform source inspection or audit in accordance with appropriate procedures when required by the procurement document.

6.3 Purchased Material

When required by the procurement document, purchased material shall be receipt inspected by the Quality Assurance Department in accordance with QAD procedures. Sampling inspection techniques, when in accordance with an approval sampling plan, may be utilized.

Nuclear Materials Management Department inspects all items received in accordance with Nuclear Materials Management Procedures.

If a nonconformance is noted at receiving inspection, material shall be placed on hold until the nonconformance is resolved in accordance with approved procedures.

7.0 MATERIAL CONTROL

Fire Protection materials and equipment shall be controlled in accordance with Nuclear Materials Management procedures while in the possession of Nuclear Materials Management. Materials not in the possession of Nuclear Materials Management are controlled by responsible department's procedures.

8.0 INSPECTION/SURVEILLANCE

8.1 General Requirements

Primary Inspection, Surveillance and Overcheck Inspection shall be established and executed by the organizations performing the work activity, as described in the following paragraphs and identified in Figure 8.1.

Since more than one department can be involved in performing work on a particular modification, maintenance or test activity, each organization is shown as having responsibility for Primary Inspection of the work performed by that organization.

The term "Surveillance", as used in this document, refers to those surveillance activities performed by NMPC QA Department.

The QA Department is responsible for performing periodic Overcheck Inspections. Performance may be delegated to other organizations. When Overcheck Inspection discloses an unsatisfactory condition, the organization responsible for Primary Inspection is required to take appropriate action to resolve the questionable work performed. NMPC QA concurrence of resolution is required.

- o Modification Installation

  Modification packages are developed within the Nuclear Engineering organization. The final modification package may contain an installation plan and inspection requirements. These requirements may be specified in a formal inspection plan or incorporated in a traveler or similar document. The installing organization (contractor or NMP Maintenance) will be responsible for performing the required inspections. This activity is designated as a Primary Inspection in Figure 8.1 and is subject to Surveillance by NMPC QA. Contractor inspection responsibilities will be specified in procurement documents.

- o Corrective Maintenance

  Corrective maintenance is performed on those systems identified in Attachment 1 in accordance with the requirements of the Nine Mile Point Nuclear Station Site Administrative Procedures. The supervisors signature on the Work Requests indicates his verification and acceptance of the work, in compliance with the Administrative Procedures. This satisfies the primary inspection responsibility specified in Figure 8.1..

8.0 INSPECTION/SURVEILLANCE (CONTINUED)

8.1 General Requirements (continued)

- Preventive Maintenance and Operational Inspections/ Tests

  Preventive Maintenance and Operational Inspections/Tests do not result in changes to plant systems. Therefore, Primary Inspection of these activities is performed by the technician or maintenance person assigned to perform the work.

8.2 Independence of Inspection Personnel

Inspection and surveillance shall be performed and documented by individuals other than those who performed the work, except as noted in Paragraph 8.1 above, relating to Preventative Maintenance and Operational Inspections/Tests.

8.3 Inspection Procedures

Inspection procedures, instructions, or checklists shall provide the following:

- Identification of characteristics and activities to be inspected.
- Identification of the individuals or groups responsible for performing the inspection operation.
- Acceptance and rejection criteria.
- A description of the method of inspection including any special equipment necessary to perform the task.
- Requirements for documentation of inspection results.
- Sampling inspection criteria.

8.4 Personnel Qualifications

Quality Assurance/Quality Control personnel performing overcheck inspections and NDE shall meet applicable qualification criteria as set forth in QATR-1.

FIRE PROTECTION
QUALITY ASSURANCE PROGRAM
INSPECTION RESPONSIBILITY MATRIX

RESPONSIBLE ORGANIZATION	MATL. RECEIPT	MODIF. INSTALL.	CORRECTIVE MAINTENANCE	PREVENTIVE MAINT. AND OPERATIONAL INSPECTION/TEST
Contractors	-	P	P	P
Mech. & Elect. Maintenance	-	P	P	P
Inst. & Controls & Fire Protection	-	P	P	P
Materials Management	P	-	-	-
Quality Assurance	O,S	O,S	O,S	S

COVERAGE REQUIRED

P - Primary Inspection Responsibility - 1st line inspection.

S - Surveillance - Monitors performance of activity or inspection.

O - Overcheck Inspection - Performed on a sample basis.

Figure 8.1

9.0 TEST AND TEST CONTROL

9.1 General

A test program shall be established and implemented to ensure that test requirements are satisfied and that systems conform to design and licensing documents, as applicable. The program shall be verified through review, audit or surveillance, based on an evaluation of program details. The tests shall be performed in accordance with written test procedures, at a frequency specified by the test program.

9.2 Test Results

Test results shall be documented, evaluated and their acceptability determined by a qualified individual or group.

10.0 CONTROL OF MEASURING AND TEST EQUIPMENT

Validity of measurements and tests will be assured through the use of appropriate inspection, measuring and test equipment of the range, validity, and type necessary to determine conformance to requirements. At intervals established to ensure continued validity, measuring devices shall be verified or calibrated, if appropriate, against certified standards that have a known, valid relationship to national standards.

11.0 INSPECTION, TEST AND OPERATING STATUS

Measures shall be established to provide for the identification of items that have satisfactorily passed required tests and inspections. These measures include provisions for identification by means of tags, labels, documents directly traceable to the affected items, or similar temporary markings to indicate completion of required inspections and tests. Operating status may also be indicated by any of the foregoing means, consistent with plant operating procedures.

12.0 NONCONFORMING MATERIALS, PARTS OR COMPONENTS

12.1 General

Measures shall be established to control materials, parts or components that do not conform to specified requirements.

12.2 Identification/Control

The identification (tagging or marking), documentation, segregation, review disposition, and notification to the affected organization of nonconforming materials, parts or components, shall be procedurally controlled.

12.3 Documentation

Documentation shall identify the nonconforming item, describe the nonconformance and record the disposition.

13.0 CORRECTIVE ACTION

Procedures shall be established to ensure that conditions adverse to fire protection such as failures, malfunctions, deficiencies, deviations, defective components, uncontrolled combustible material and nonconformances are promptly identified, reported and corrected.

14.0 RECORDS

14.1 General

Records shall be prepared and maintained according to procedures to furnish evidence that the criteria enumerated in this program are met for activities affecting the fire protection program.

14.2 Records Control

Records shall be identifiable and retrievable. The records should include results of inspections, tests, reviews, and audits; nonconformance and corrective action reports; construction, maintenance and modification records; and certified manufacturers data as applicable.

14.3 Record Retention

Record retention requirements shall be established by applicable procedures.

15.0 AUDIT

15.1 General

Audits shall be conducted and documented to verify compliance with the Fire Protection Program.

15.2 Audit Program *

The following Audit Program will be implemented:

- An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.
- The Fire Protection Program and implementing procedures at least once per 24 months.
- An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 36 months.

Fire Protection audits and inspections may be combined during a specific audit period provided the scope of the audit/inspection clearly indicates the required inspection attributes, team composition, and results based on the type of audit and/or inspection.

15.3 Audit Results

Audit results shall be documented and reviewed with management having responsibility in the area audited.

* Reference NRC generic letter 82-21, "General Scope of Fire Protection Audits and Composition and Qualifications of Auditors", for guidance regarding audit team participation and audit scope.

Attachment 1

FIRE PROTECTION SYSTEMS DEFINITION

Fire Protection Systems are defined in Section 3.6.6 - 3.6.10 inclusive and 4.6.6 - 4.6.10 inclusive of amendment 53 of the NMP-1 Technical Specification and in the Nine Mile Point Unit 1 Fire Protection Program and for NMP-2 in Section 9.5 and Appendix 9A.3 of the NMP-2 FSAR submitted to the NRC through Amendment No. 27 and as described in submittals dated March 25, May 7 and 9, June 10 and 25, July 11 and 16, August 19 and 22, September 5, 12 and 23, October 10, 21 and 22, and December 9, 1986 and April 10 and May 20, 1987, and as approved in the SER dated February 1985 (and Supplements 1 through 6).

These systems include:

Systems	Unit Identifier I	Unit Identifier II
o Water Supply	100	FPW
o Fixed, Water Fixed Extinguishing Systems	100	FPW
o Fixed Water/Foam Extinguishing Systems	100	FPF
o Fire Detection and Supervision System	100	FPM
o Manual Water Hose Line Extinguishing Equipment	100	FPW
o Fixed CO_2 Extinguisher Systems	99	FPL
o Fixed Halon 1301 Extinguishing Equipment	209	FPG
o Manual CO_2 Hose Line Extinguishing Equipment	99	FPL
o Smoke Removal Systems	Varies	Varies
o Emergency Lighting Systems	209	N/A
o Miscellaneous Fire Protection Equipment, such as Self Contained Breathing Apparatus, Hose Nozzles Fire Hose, Protein Foam, Coats (Turn Out Gear), Portable Extinguishers, Control Valve Spare Parts, Ladders, etc.	209	N/A
o Fire Protection Barriers, including barrier doors, dampers and penetrations	PHS/DOORS	FPP

ATTACHMENT 2

NIAGARA MOHAWK	REQUEST FOR QUALIFICATION FIRE PROTECTION CONTRACTORS	313-310 N07-87 SYMBOL NO. 55-32-320	REQUEST NO.

REQUESTOR	DATE	PHONE NO.

DEPARTMENT	LOCATION

CONTRACTOR

FULL NAME	DIVISION OF	PHONE NO.

ADDRESS

CONTACTS (INCLUDE TITLES) _____

SERVICES

☐ DESIGN ☐ MANUFACTURE ☐ INSTALLATION

☐ OTHER - EXPLAIN _____

BASIS OF QUALIFICATION

☐ PAST EXPERIENCE WITH CONTRACTOR

☐ KNOWLEDGE THAT THE CONTRACTOR PROVIDES SERVICES MEETING INDUSTRY STANDARDS REQUIRED BY THE CURRENT NATIONAL FIRE CODES.

☐ RECOMMENDATION OF THE CONTRACTOR FROM THE FOLLOWING NIAGARA MOHAWK POWER CORPORATION SPECIALIST.
SPECIALIST'S NAME: _____

☐ ASSESSMENT BASED ON REFERERENCE FROM OUTSIDE NIAGARA MOHAWK POWER CORPORATION SPECIALIST.
REFERENCE NAME: _____

☐ OTHER - EXPLAIN _____

AUTHORIZED FIRE PROTECTION ENGINEERING APPROVAL : _____ (SIGNATURE) _____ DATE

ATTACHMENT 1

SUMMARY OF CHANGES
NMPC QUALITY ASSURANCE TOPICAL REPORT
FOR
NINE MILE POINT
NUCLEAR STATION OPERATIONS

QATR-1, REVISION 5

The following changes have been made to clarify or update certain sections of the Report. None of the changes constitute a change in the Quality Assurance Program.

General - Title of Executive Vice President, Nuclear, has been changed throughout report to Executive Vice President, Nuclear Operations.

Page 1-1, Section 1.1 - Adds two departments; Nuclear Services and Controller Nuclear Division.

Page 1-2, Section 1.2.2.A - Changed title to Executive Vice President, Nuclear Operations.

Page 1-3, Section 1.2.2.A.3.a - Change reflects current responsibilities.

Page 1-4, Section 1.2.2.A.3.b - Change reflects current responsibilities.

Page 1-4, Section 1.2.2.A.4 - Change reflects current organizational title.

Page 1-5, Section 1.2.2.B - Changed title to Executive Vice President, Nuclear Operations.

Page 1-6, Section 1.2.2 C,D&E.1 - Change reflects current responsibilities.

Page 1-6, Section 1.2.2.E.2-4 - Change reflects current responsibilities.

Page 1-7, Section 1.2.2.E.5 - Adds Project Managers and their responsibilities.

Page 1-7, Section 1.2.2.F - Change reflects current responsibilities.

Page 1-8, Section 1.2.2.G - Adds new department, Manager, Nuclear Independent Assessment Group (IAG) and its responsibilities.

Page 1-8, Section 1.2.2.H - Adds new department, Controller Nuclear Division, and its responsibilities.

Page 1-8, Section 1.2.2.I - Moved Section 1.2.4.A, Quality Assurance Responsibilities, previously described separately under Paragraph 1.2.4.A are now included in description of Nuclear Division responsibilities.

Page 1-10, Section 1.2.2.I.2.a - Added restriction on interpretation and implementation of QA Policy and Procedures.

Page 1-10, Section 1.2.2.I.2.d - Change clarifies responsibilities.

Page 1-10, Section 1.2.2.I.2.f - Refers to the Quality Assurance Procedures (QAPs) for specific duties.

ATTACHMENT 1

SUMMARY OF CHANGES
NMPC QUALITY ASSURANCE TOPICAL REPORT
FOR
NINE MILE POINT
NUCLEAR STATION OPERATIONS

QATR-1, REVISION 5

(CONTINUED)

Page 1-10, Section 1.2.2.I.3.a - Adds responsibilities.

Page 1-11, Section 1.2.2.I.4 - Revised for clarity.

Page 1-11, Section 1.2.2.I.4.a - Adds responsibilities.

Page 1-12, Section 1.2.2.I.5 - Change scope to include group leads.

Page 1-16, Figure 1-1 - Changes organization chart to reflect current organization.

Page 1-17, Figure 1-2 - Adds two departments, Nuclear Services Department and Nuclear Division Projects and their responsibilities. Also adds departments' primary procedures by title and letter designation.

Page 2-6, Section 2.2.16 & 2.2.17 - Adds Executive Vice President, Nuclear Operations.

Page 7-1 & 7.2, Section 7.2.3 - Adds a paragraph explaining how procurement of safety- related equipment is allowed from suppliers not on the Qualified Contractors List Database (QCLD).

Page 11-2, Section 11.2.4 - Revised for clarity.

Page 15-1, Section 15.1 - Revises second paragraph of Policy to reflect present systems to handle nonconforming conditions.

Page 15-1 & 15.2, Section 15.2 - Revises format to clarify requirements.

Page 16-1, Section 16.1 - Restates policy in more general terms.

Page 16-1, Section 16.2.2 - Establishes requirement for controls to be stated in departmental procedures.

Appendix B, Page B-5 - Exception 3N, added to reflect commitment as shown in Appenidx A, Item 7.

Appendix B, Page B-9 - Exception 4F revised to reflect NQA-1 1989 temporary storage criteria.

Appendix B, Page B-9 & B-10 - Exception 4G added to reflect upgrade in NFPA code year, from 1975 to 1986 as delineated in NQA-1, 1989.

Appendix C, Page C-2 - Deleted, cancelled, QAP 14.20 from the procedure matrix.

(coverlet)