



Consumers
Power

**POWERING
MICHIGAN'S PROGRESS**

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Nuclear Regulatory Commission
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DOCKET 50-155 - LICENSE DPR-6 - BIG ROCK POINT PLANT -
DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
TOPICAL REPORT CPC-2A (REVISIONS 9 AND 10) QUALITY ASSURANCE
PROGRAM DESCRIPTION FOR OPERATIONAL NUCLEAR POWER PLANTS

Attached are Revisions 9 and 10 of Consumers Power Company Topical Report CPC-2A, Quality Assurance Program Description for Operational Nuclear Power Plants. Revision 9, dated April 1, 1989, and Revision 10, dated October 1, 1989, are Consumers Power Company's annual report being submitted in accordance with 10CFR50.54(A)(3). Also enclosed as Attachments 1 through 4 are lists of affected pages in Revisions 9 and 10 and change matrices comparing Revision 9 with Revision 8 and Revision 10 with Revision 9.

The matrices present the changes made, the reasons for the changes, and the basis for concluding they do not constitute a reduction in our QA Program commitments. Some of the changes had previously been submitted for, and received, NRC approval. These are clearly indicated in the matrix.

Brian D. Johnson for

Kenneth W Berry
Director, Nuclear Licensing

CC Administrator, Region III, USNRC
NRC Resident Inspectors - Big Rock Point & Palisades

Attachments

Q004
11

OC1089-0209-NL04

8910240124

10/24/89
ADDER 0100100
10/24/89

ATTACHMENTS

Consumers Power Company
Big Rock Point & Palisades Plants
Dockets 50-155 & 50-255

1. Attachment 1 - List of pages changed in Rev 9
2. Attachment 2 - Matrix drawing changes made from Rev 8 to Rev 9
3. Attachment 3 - List of pages changed in Revision 10
4. Attachment 4 - Matrix showing changes made from Rev 9 to Rev 10
5. Information copies of CPC-2A, Rev 9
6. Information copies of CPC-2A, Rev 10

October 19, 1989

193 Pages

OC1089-0209-NL04

ATTACHMENT 1

List of CPC-2A pages changed in Revision 9

Statement of Responsibility and Authority

Approval
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QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

Revision 8

1

Cover Letter
2nd Paragraph

I have delegated the authority for the establishment and maintenance of the Quality Assurance Program Description to the Senior Vice President, Energy Supply for operational phase activities and plant modifications, and in turn to the Director, Quality Assurance. The Director, Quality Assurance is also authorized to verify the effective implementation of the Quality Assurance Program Description.

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Page 2,
1.2.2.a, 5th and 6th Paragraph

At Big Rock Point, procurement planning for the plant including preparation of and obtaining the required reviews and approval of purchase requests for spares, replacement items and consumables; and materials, items and services for minor modifications; and submittal of purchase request packages to Purchasing for procurement actions.

At Palisades, control of procurement for plant, including preparation, reviews and approval of purchase requests for spares, replacements items, consumables, and materials, items and services for minor modifications. Control also includes submittal of purchase requests to Purchasing, vendor surveys for urgent procurements, planning and execution of source surveillance or inspection, receiving inspection, and review of supplier quality-related documentation.

MI0989-0125A-QA01

Revision 9Cover Letter
2nd Paragraph

I have delegated the authority for the establishment and maintenance of the Quality Assurance Program Description through the Senior Vice President, Energy Supply to the Vice President, Nuclear Operations for operational phase activities and plant modifications, and in turn to the Director, Quality Assurance. The Director, Quality Assurance is also authorized to verify the effective implementation of the Quality Assurance Program Description.

Page 2,
1.2.2.a, 5th Paragraph

Control of plant initiated procurement, including preparation, reviews and approval of purchase requests for spares, replacement items, consumables, and materials, items and services. Control also includes submittal of purchase requests to Purchasing, vendor surveys for urgent procurements, planning and execution of source surveillance or inspection, receiving inspection, and review of supplier quality-related documentation.

Reason for Change

This change recognizes that the VP-NO is part of the management chain with the responsibility and authority for the QA Program. This has always been the case, but the cover letter did not show it.

This change recognizes that the organizational restructuring for procurement that was recognized in Revision 8 for Palisades has now been implemented at Big Rock Point Plant, as well.

Basis for Conclusion

The organization described in the QAPD continues to meet Criterion I of 10CFR50 Appendix B, in that no changes to the previously approved organization structure have been made.

Changes related to QA for procurement were reviewed by NRC as part of its review of Revision 8. Subject to the clarifications indicated in its letter dated August 2, 1989, NRC has determined that the CP Co QAPD continues to meet 10CFR50, Appendix B.

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

<u>Revision 8</u>	<u>Revision 9</u>	<u>Reason for Change</u>	<u>Basis for Conclusion</u>
<p>3</p> <p><u>Page 2</u></p> <p>Not addressed.</p>	<p><u>Page 2</u></p> <p><u>1.2.2.a, 6th Paragraph</u></p> <p>Functioning as the Company design and configuration control authority for compliance of plant modifications and design changes to existing plant design criteria.</p>	<p>This change completes an INPO commitment to clearly identify each plant as having design and configuration control authority.</p>	<p>The QAPD, as revised, continues to meet Criterion I of Appendix B, in that the authorities and duties of persons and organizations performing activities affecting the safety-related functions of structures, systems and components are clearly established and delineated in writing.</p>
<p>4</p> <p><u>Page 2, 1.2.2.a, 7th Paragraph</u></p> <p>Project responsibility for minor modifications including design, procurement, construction and testing activities, whether performed by CP Co or by outside contractors.</p>	<p><u>Page 2, 1.2.2.a, 7th Paragraph</u></p> <p>Project responsibility for modifications, including design, procurements, construction and testing activities as assigned by the Plant General Manager/Manager.</p>	<p>In conjunction with item (3), and other changes herein, this change recognizes the plants as having ultimate control of modifications, and also removes the distinction between "major" and "minor."</p>	<p>See Item 3.</p>
<p>5</p> <p><u>Page 3</u></p> <p><u>1.2.2.a, 9th Paragraph</u></p> <p>Development and maintenance of Plant Security Plans and contract administration for the security force.</p>	<p><u>Page 2</u></p> <p><u>1.2.2.a, 9th Paragraph</u></p> <p>Developing and maintaining Plant Security Plans and administering the contract(s) for the security force.</p>	<p>This change is purely editorial, at the request of the involved management, to make the wording parallel that of the remainder of the Section.</p>	<p>See Item 3.</p>
<p>6</p> <p><u>Page 3</u></p> <p><u>Paragraph 17</u></p> <p>Not in this revision.</p>	<p><u>Page 3</u></p> <p><u>1.2.2.1, 17th Paragraph</u></p> <p>Developing and maintaining Plant Fire Protection Plans.</p>	<p>The responsibility for this function was shifted from the Facilities and Automotive Department, as formerly indicated in Section 1.2.4.a, to each plant. See item 14.</p>	<p>See Item 3.</p>

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

Revision 8

7

Page 4
1.2.2.b, 1st Paragraph

Performance of the offsite safety review functions for the nuclear power plants as described in plant technical specifications, and probabilistic risk assessment.

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Page 4
1.2.3

The Vice President, Energy Supply Services (see Figure 6) is responsible to the Senior Vice President, Energy Supply for certain services, including standards for calibration of M&TE, operating the personnel dosimetry laboratory and major modifications to CP Co nuclear power plants. Directors and Managers reporting to him are responsible for directing the performance of activities in accordance with QA Program requirements.

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Page 5
1.2.3.b, 1st Paragraph

Performing the construction, preoperational testing and overall project management of generating plant major modification projects.

Revision 9Page 3
1.2.2.b, 1st and 2nd Paragraphs

Performance of the offsite safety review functions for the nuclear power plants as described in plant technical specifications.

Development and maintenance of nuclear plant probabilistic risk assessment models and application of PRA technology to severe accident management and plant reliability improvement.

Page 4
1.2.3

The Vice President, Energy Supply Services (see Figure 6) is responsible to the Senior Vice President, Energy Supply for certain services, including standards for calibration of M&TE, operating the personnel dosimetry laboratory and performing assigned modifications to CP Co nuclear power plants. Directors and Managers reporting to him are responsible for directing the performance of activities in accordance with QA Program requirements.

Page 5
1.2.3.b, 1st Paragraph

Performing the construction, preoperational testing and overall project management of assigned generating plant modification projects.

Reason for Change

This change clarifies the responsibilities of the NSSD with respect to PRA and its uses in severe accident management and plant reliability improvement.

This change, in conjunction with item (3) and others herein, recognizes the plants as "design authority," and clarifies that ESS will perform such work as authorized and requested by Nuclear Operations.

See Item 8.

Basis for Conclusion

See Item 3.

See Item 3.

See Item 3.

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

<u>Revision 8</u>	<u>Revision 9</u>	<u>Reason for Change</u>	<u>Basis for Conclusion</u>
10			
<u>Page 5</u> <u>1.2.3.c</u> The Manager, Field Maintenance Services provides Field Maintenance Services for major modifications and plant outages.	<u>Page 6</u> <u>1.2.3.c</u> The Manager, Field Maintenance Services provides Field Maintenance Services for assigned modifications and plant outages.	See Item 8.	See Item 3.
11			
<u>Page 6</u> <u>1.2.3.d, 1st Paragraph</u> Performing the engineering of generating plant modification projects. This includes functioning, as appropriate, as either the lead design organization when such projects are engineered in-house or as the Company's design reviewer when those projects are done by outside engineering organizations.	<u>Page 6</u> <u>1.2.3.d., 1st Paragraph</u> Performing the engineering associated with generating plant modification projects as assigned by the Plant General Manager/Manager.	See Item 8. Since each plant is designated as "design authority," it will determine which organization, if not itself, may handle lead design or design reviewer functions. In all cases, the plant will retain its "design authority."	See Item 3.
12			
<u>Page 6</u> <u>1.2.3.e, 1st Paragraph</u> Maintaining the Records Management System including required retention, protection and retrievability, operating the General Office (offsite) Document Control Center and for maintaining the Uniform File Index. This includes collecting, storing, maintaining, distributing and controlling plant engineering/design documents through the Engineering Records Center.	<u>Page 6</u> <u>1.2.3.e, 1st Paragraph</u> Maintaining the Records Management System including required retention, protection and retrievability, operating the General Office (offsite) Document Control Center and Engineering Records Center, and for maintaining the Uniform File Index. This includes collecting, storing, maintaining, distributing and controlling plant engineering/design documents.	This change is editorial, at the request of the involved management, to provide a more clearly worded treatment of responsibilities.	See Item 3.

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

<u>Revision 8</u>	<u>Revision 9</u>	<u>Reason for Change</u>	<u>Basis for Conclusion</u>
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<u>Page 6</u> <u>1.2.4</u>	<u>Page 6</u> <u>1.2.4</u>		
Certain functions that constitute part of the Nuclear Operations QA Program are performed by CP Co organizational units outside the Nuclear Operations Department or Energy Supply Services, as follows:	Certain functions that constitute part of the Nuclear Operations QA Program are performed by CP Co organizational units outside the Nuclear Operations Department or Energy Supply Services. Engineering and design tasks executed in support of plant activities are subject to review and acceptance by the associated plant organization responsible for that activity (as the design authority).	See Item 8.	See Item 3.
14			
<u>Page 6</u> <u>1.2.4.a</u>	<u>Page 6</u>		
The Manager, Facilities and Automotive (see Figure 5) is responsible through the Vice President, Corporate Services to the President and C.O.O. for developing and maintaining the Fire Protection Plans for the nuclear power plants.	Not in this revision.	The responsibility for development and maintenance of fire protection plans was transferred to each plant. Since Facilities and Automotive had no other identified functions, it is deleted from CPC-2A.	See Item 3.
15			
<u>Page 6</u> <u>1.2.4.b</u>	<u>Page 6</u> <u>1.2.4.a</u>		
The Manager, Administrative Operations and Planning (see Figure 5) is responsible through the Vice President, Corporate Services to the President and C.O.O. for microfilming of specified QA records and plant engineering/design documents.	The Director, Administrative Operations and Planning (see Figure 5) is responsible through the Vice President, Corporate Services to the President and Chief Operating Officer for microfilming of specified QA records and plant engineering/design documents.	Title change only.	See Item 3.

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

<u>Revision 8</u>	<u>Revision 9</u>	<u>Reason for Change</u>	<u>Basis for Conclusion</u>
16	<u>Page 8</u> <u>1.2.5, 9th Paragraph</u>		
Not in this revision.	QA engineering associated with modification design, procurement, construction and testing, including verification that quality-related test prerequisites have been accomplished, identification and participation in resolution of installation inspection and test problems and nonconformances, and maintenance and reporting of status of hardware and test quality and corrective action. (This function will be carried out by plant and/or general office QA staff, as assigned by the Director, QA.)	This change recognizes that the functions identified could be performed by either (or both) plant or General Office QA staff. Thus, the description is elevated to be listed under the Director, QA, instead of twice under both plant and GO QA.	See Item 3.
17	<u>Page 9</u> <u>1.2.5.a, 5th Paragraph</u>		
At Big Rock Point, review of and concurrence with quality requirements of procurement request packages for plant site-originated procurements.	Not in this revision.	See Item 2.	See Item 2.
18	<u>Page 9</u> <u>1.2.5.a, 9th Paragraph</u>		
Plant site quality control inspection program, including receiving inspection (at Big Rock) and inspection of maintenance, modifications, testing and fuel handling.	<u>Page 9</u> <u>1.2.5.a, 6th Paragraph</u>	See Item 2.	See Item 2.
	Plant site quality control inspection program, including inspection of maintenance, modifications, testing and fuel handling.		

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

<u>Revision 8</u>	<u>Revision 9</u>	<u>Reason for Change</u>	<u>Basis for Conclusion</u>
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<u>Page 10</u> <u>1.2.5.b</u>	<u>Page 9</u> <u>1.2.5.b</u>		
Quality Assurance Support Section Heads (Corporate Office) are responsible to the Director, Quality Assurance for the Nuclear Operations QA Audit Program, QA Program Development, Corporate Office QA Engineering for modifications Design and Procurement and Special Studies including the following:	Quality Assurance Section Heads (Corporate Office) are responsible to the Director, Quality Assurance for the Nuclear Operations QA audit program, QA program development, and special studies including the following:	The listing for modification design and procurement was elevated to the listing under the Director, QA. See Item 16. Other changes are editorial only.	See Item 3.
20			
<u>Page 10</u> <u>1.2.5.b, 13th Paragraph</u>	<u>Page 10</u> <u>1.2.5.b</u>		
Corporate Office QA Engineering associated with modification design and procurement, including preparation of necessary quality assurance plans for integration with project plans, performance of source surveillance/inspection at supplier facilities, review of supplier quality-related documentation and maintenance and reporting of status of hardware and test quality and corrective action (offsite).	Not in this revision.	This item was elevated to be listed under the Director, QA, as the function could be performed by either plant or General Office QA, or both, as directed. Some supplier verifications may also be performed by the plant staff per item (2).	See Item 3.
21			
<u>Page 14</u> <u>Figure 4</u>	<u>Page 14</u> <u>Figure 4</u>		
Title Box: "QA Support Section Heads"	Title Box: "General Office QA Section Heads"	This change recognizes the deletion of "support" as part of the Department Title for QA. This is editorial; the reporting relationships previously existing were not affected.	See Item 3.

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

Revision 8

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Page 15
Figure 5

Eliminated Manager Facilities and Automotive from chart. Changed one title to Director Administrative Operations and Planning.

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Page 23
3.2.1

Authority and responsibility for modification activities under the cognizance of the Nuclear Operations Department and the Energy Supply Services Departments are described in Section 1.0, ORGANIZATION. This authority and responsibility includes the preparation, review, approval and verification of the following design documents: a) System descriptions; b) Design input and criteria; c) Drawings and specifications; and d) Engineering analyses and associated computer programs.

Revision 9Page 15
Figure 5

One title box for Manager Facilities and Automotive under Vice President. Also Manager Administrative Operations and Planning.

Page 23
3.2.1

Authority and responsibility for modification activities is under the cognizance of the Nuclear Operations Department as described in Section 1.0, ORGANIZATION. This authority and responsibility includes the preparation, review, approval and verification of the following design documents: a) System descriptions; b) Design input and criteria; c) Drawings and specifications; and d) Engineering analyses and associated computer programs.

Reason for Change

See Item 14 and Item 15.

See Item 8.

Basis for Conclusion

See Item 3.

See Item 3.

ATTACHMENT 3

List of CPC-2A pages changed in Revision 10

Approval
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QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

<u>Revision 9</u>	<u>Revision 10</u>	<u>Reason for Change</u>	<u>Basis for Conclusion</u>
<p><u>Page 4</u> <u>1.2.2.b, Paragraph 4</u></p> <p>Assessing the effectiveness of the Corporate Health Physics program and maintaining standards for control of Radiological Materials and personnel exposure and recommending program improvements to reduce on-site and offsite radiation exposure caused by plant operations.</p>	<p><u>Page 4</u> <u>1.2.2.b, Paragraph 4</u></p> <p>Assessing the effectiveness of the Corporate Health Physics program and maintaining standards for control of Radiological Materials and personnel exposure and recommending program improvements to reduce on-site and offsite radiation exposure caused by plant operations, operating the Dosimetry Laboratory and maintaining records of personnel radiation exposure.</p>	<p>Due to a reorganization, the Dosimetry Laboratory now reports to the Corporate Health Physicist who is a member of the staff of the Nuclear Safety Services Department.</p>	<p>The function is still being performed; it is just the responsibility of a different department.</p>
<p><u>Page 4</u> <u>1.2.3</u></p> <p>The Vice President, Energy Supply Services (see Figure 6) is responsible to the Senior Vice President, Energy Supply for certain services, including standards for calibration of M&TE, operating the personnel dosimetry laboratory and performing assigned modifications to CPCo nuclear power plants. Directors and Managers reporting to him are responsible for directing the performance of activities in accordance with QA program requirements.</p>	<p><u>Page 4</u> <u>1.2.3</u></p> <p>The Vice President, Energy Supply Services (see Figure 6) is responsible to the Senior Vice President, Energy Supply for certain services, including standards for calibration of M&TE, and performing assigned modifications to CPCo nuclear power plants. Directors and Managers reporting to him are responsible for directing the performance of activities in accordance with QA Program requirements.</p>	<p>The Dosimetry Laboratory is now under Nuclear Operations rather than Energy Supply Services.</p>	<p>See item above.</p>
<p><u>Page 4</u> <u>1.2.3.a</u></p> <p>The Manager, Laboratory and Field Services (L&FIS) is responsible, through personnel reporting to him, for:</p>	<p><u>Page 4</u> <u>1.2.3.a</u></p> <p>The Manager, Energy Supply Technical Services (ESTS) is responsible, through personnel reporting to him, for:</p>	<p>Title change.</p>	<p>Merely a change in the name of the department.</p>
<p><u>Page 5</u> <u>1.2.3.a, Paragraphs 4 and 5</u></p> <p>Controlling the calibration recall system for Portable and Laboratory M&TE owned by L&FIS, and other departments, as requested.</p> <p>Maintaining a Master PL-M&TE List for L&FIS PL-M&TE and for other departments, as requested.</p>	<p><u>Page 5</u> <u>1.2.3.a, Paragraphs 4 and 5</u></p> <p>Controlling the calibration recall system for Portable and Laboratory M&TE owned by ESTS, and other departments, as requested.</p> <p>Maintaining a Master PL-M&TE List for ESTS PL-M&TE and for other departments, as requested.</p>	<p>Title change.</p>	<p>Merely a change in the name of the department.</p>

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

<u>Revision 9</u>	<u>Revision 10</u>	<u>Reason for Change</u>	<u>Basis for Conclusion</u>
<u>Page 5</u> <u>1.2.3.a, Paragraph 9</u> <p>Operating the Dosimetry Laboratory (including preparation and maintenance of occupational radiation and exposure records).</p>	<u>Page 5</u> <u>1.2.3.a, Paragraph 9</u> <p>Not in this revision.</p>	Responsibility transferred	See Item 1.
<u>Page 9</u> <u>1.2.5.a, Paragraph 5</u> <p>Review and concurrence with procurement quality requirements for nuclear fuel, source audit/surveillance/inspection at fuel supplier facilities, fuel receiving inspection, and review of fuel supplier quality-related documentation.</p>	<u>Page 9</u> <u>1.2.5.a, Paragraph 5</u> <p>Review and concurrence with procurement quality requirements for nuclear fuel, source audit/surveillance/inspection at fuel supplier facilities, fuel inspection upon delivery, and review of fuel supplier quality-related documentation.</p>	Clarification of QC's role since receipt inspection is normally performed by Material Management except for fuel.	QC's responsibility has not changed. This is just a clarification.
<u>Page 16</u> <u>Figure 6</u> <p>Title is Manager, Lab and Field Technical Services.</p>	<u>Page 16</u> <u>Figure 6</u> <p>Shows the title change to Manager, Energy Supply Technical Services.</p>	Title change.	Merely a change in the name of the department.
<p>Not in this revision.</p>	<u>Page 20</u> <u>2.2.9.1</u> <p>The Quality Assurance Department provides training in quality assurance principles related to procurement for those personnel performing procurement documents, source verification and receipt inspection.</p>	Agreement with NRC contained in August 2, 1989 letter from Chief, Operations Branch, Division of Reactor Safety, Region III.	Prior NRC approval.
<u>Page 53</u> <u>15.2.1.e</u> <p>The Quality Assurance Department verifies through audit or surveillance that, when it is not the original inspection planning authority, the dispositions of 15.2.1.b and the alternate acceptance criteria of 15.2.1.c are being properly performed and reviewed.</p>	<u>Page 53</u> <u>15.2.1.e</u> <p>The Quality Assurance Department reviews "use as is" or "repair" dispositions which result in deviation from original design or specification requirements.</p>	Agreement with NRC contained in August 2, 1989 letter in response to our letter of May 19, 1989.	Prior NRC approval per 8/2/89 letter.

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

<u>Revision 9</u>	<u>Revision 10</u>	<u>Reason for Change</u>	<u>Basis for Conclusion</u>
<p>Not in this revision.</p>	<p><u>Page 67</u> <u>Exception/Interpretation 2.m</u> <u>Sec 5.1.15</u></p> <p><u>Requirement</u> Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable.</p> <p><u>Exception/Interpretation</u> Based on amplification provided in ANSI/ANS 3.2-1982, Section 5.2.15, Consumers Power Company interprets that this requirement for routine follow-up review can be accomplished in several ways, including (but not limited to): documented step-by-step checkoff associated with it) or detailed scrutiny of the procedure as part of a documented training program, drill, simulator exercise, or other such activity.</p>	<p>The change allows greater flexibility in how the biennial review requirement can be met. It will allow for follow-up reviews to be done by persons most likely to notice procedural inadequacies.</p>	<p>Prior NRC approval per 8/2/89 letter.</p>
<p><u>Page 67</u> <u>Exception/Interpretation 2.m-2.o</u></p> <p>See Revision 10.</p>	<p><u>Page 67</u> <u>Exception/Interpretation 2.m-2.p</u></p> <p>Renumbered due to new 2.m.</p> <p><u>Page 69 and 70</u> <u>Exception/Interpretation 3.b</u> <u>RG 1.33, Sec C.4.b</u></p> <p><u>Requirement</u> The conformance of facility operations to provisions contained within the technical specifications and applicable license conditions - at least once per 12 months.</p> <p><u>Exception/Interpretation</u> Consistent with guidance presented in NRC letters dated March 29, 1983 (RLSpessard to JMTaylor) and January 30, 1984</p>	<p>Renumbering only.</p> <p>The change is requested to establish scope and frequency controls for audits of plant Technical Specification requirements. It provides for the division of Tech Spec requirements into specific areas, and the complete coverage of the entire Tech Specs over a 5 year span (maximum). It is consistent with the NRC guidance referenced in the change.</p>	<p>Renumbering only.</p> <p>Approved per NRC letter of 8/2/89.</p>

QUALITY ASSURANCE PROGRAM DESCRIPTION (CPC-2A)

Revision 9	Revision 10	Reason for Change	Basis for Conclusion
	<p>(JGPartlow to RLSpessard), Consumers Power Company interprets the commitment to audit technical specification/license conditions contained in 18.2.2(a) of this QAPD, and in Section 6.5.2.8(a) of both Palisades and Big Rock Point Technical Specifications, as follows:</p> <p>Consumers Power Company maintains a matrix that identifies all applicable Technical Specification line items to be audited. The matrix is updated annually to conform to approved Technical Specification changes. During each 12 month period, a selected sample of line items in each of the following elements is audited:</p> <ol style="list-style-type: none"> 1. Limiting Conditions for Operation 2. Limiting Safety System Settings 3. Reactivity Control Systems 4. Power Distribution Limits 5. Instrumentation 6. Reactor Coolant System 7. Emergency Core Cooling System 8. Containment Systems 9. Plant Systems 10. Electrical Power Systems 11. Refueling Operations 12. Special Tests 13. Onsite Committee 14. Offsite Committee 15. Administrative Controls <p>Audits are scheduled so that all line items are covered within a maximum period of 5 years. The audit period for any of the above elements may be reduced depending on Technical Specification compliance history.</p>		