

1671 Worcester Road, Framingham, Massachusetts 01701

YANKEE ATOMIC ELECTRIC COMPANY
OPERATIONAL QUALITY ASSURANCE PROGRAM

YOQAP-I-A

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YANKEE ATOMIC ELECTRIC COMPANY

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AMENDMENT/REVISION SHEET

| <u>Revision No.</u> | <u>Date</u> | <u>Reason</u> |
|---------------------|-------------|---|
| 0 (Amendment 1) | 12/10/76 | To address questions submitted by letter from NRC (K. R. Goller) to L. H. Heider (11/1/76). |
| 0 (Amendment 2) | 1/13/77 | To address questions submitted by letter from NRC (K. R. Goller) to L. H. Heider (12/28/76). |
| 1 | 9/15/77 | To address organizational, programmatic, and editorial changes. |
| 2 | 11/1/77 | To address organizational changes. |
| 3 | 11/25/77 | To address organizational changes at Vermont Yankee. |
| 4 | 1/13/78 | To address combined inspection numbers 50-29/77-20; 50-271/77-15; and 50-309/77-16 unresolved item 4.a. |
| 5 | 1/30/78 | To address change in exception for ANSI N45.2.3-1973. |
| 6 | 10/19/78 | To address exceptions to ANSI N45.2.2-1972. |
| 6 (Amendment 1) | 3/29/79 | To resolve items submitted by letter from NRC (W.P. Haass) to L. H. Heider (3/6/79). |
| 7 | 9/11/79 | To address changes to Yankee Rowe (Appendix D) and Vermont Yankee (Appendix E) Safety Classifications. |
| 8 | 4/4/80 | To address organizational changes. |
| 9 | 3/9/81 | To address organizational changes. |

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POLICY STATEMENT

Operational Quality Assurance Program

It is the policy of the Yankee Atomic Electric Company that its Operational Quality Assurance Program shall comply with the requirements of the Code of Federal Regulations Title 10 Part 50 Appendix B with respect to the operation and maintenance of, and changes to those nuclear generating facilities subscribing to the Yankee Atomic Electric Company Operational Quality Assurance Program. The Program shall, in addition, address ANSI Standard N18.7 - 1976, and its referenced standards; and certain Regulatory Guides as specified in Section II "Quality Assurance Program" of the Topical Report.

Under the Program, the President is the final management authority responsible for assuring that this policy statement and the Operational Quality Assurance Program are implemented within the Yankee Atomic Electric Company.

The Senior Vice President is responsible for implementation of the Program within the Environmental Engineering, Fuel Cycle, and Nuclear Engineering Departments.

The Vice President is responsible for establishment of, and control and distribution of the Operational Quality Assurance Program and revisions thereto. He is responsible for implementation of the Program within the Nuclear Services Division Operational Quality Assurance Department.

The Vice President - Operations is responsible for implementation of the Program within the Nuclear Services Division, Plant Engineering and Operations Departments.

The Manager of the Operational Quality Assurance Department shall be responsible for ensuring that the Program is implemented for all activities requiring quality assurance. The Operational Quality Assurance Department staff shall be responsible for auditing the program as necessary and inspecting activities required by the Program to assure compliance with its requirements. The Operational Quality Assurance Department staff shall have the authority and organizational freedom necessary to meet the requirements of 10CFR50, Appendix B.

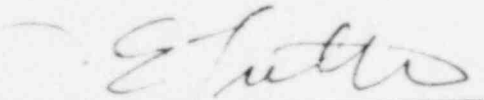
The Plant Superintendent shall be responsible for the day to day implementation of the Program's procedural requirements at the plants.

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The Nuclear Safety Audit and Review Committee shall periodically review the adequacy and effectiveness of the Program. Any discrepancies in the implementation of this policy or the Program that are revealed during the review and that require corporate action for correction, will be reported to the cognizant corporate officer together with appropriate recommendations.

Implementation of this policy is necessary in order to enhance the reliability and safety of the nuclear generating facilities. Each person involved in activities affecting the quality of structures, systems, and components that prevent or mitigate the consequences of postulated accidents that could cause undue risk to the health and safety of the public, shall be responsible for assuring quality in his own work, and for compliance with the requirements of the Program. The Operational Quality Assurance Program is a document which must be adhered to by all responsible organizations and individuals.



James E. Tribble
President

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I. ORGANIZATION

A. SCOPE

This section of the Operational Quality Assurance Program describes the duties and responsibilities of the personnel involved in establishing and executing the Operational Quality Assurance Program.

B. RESPONSIBILITY

The responsibility for design, redesign, evaluation and operation of the Plant rests with the Yankee Atomic Electric Company Nuclear Services Division. The responsibility for developing and implementing the Operational Quality Assurance Program is vested in the President of the Yankee Atomic Electric Company. He has delegated certain areas of authority for the development and implementation of certain phases of the Program as set forth in the following paragraphs of this section.

The Nuclear Services Division Operational Quality Assurance Department, reporting to the Vice President, has the organizational responsibility for the continuing review and audit of the implementation of the Operational Quality Assurance Program.

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C. ORGANIZATIONAL RELATIONSHIPS

Yankee Atomic Electric Company lines of authority of all personnel involved in the implementation of the Operational Quality Assurance Program are shown in Figures 1, 2 and 3. Interfacing between the Plant and the Yankee Nuclear Services Division is provided by the Manager of Operations and his staff.

D. QUALITY ASSURANCE PROGRAM RESPONSIBILITIES

Yankee - Nuclear Services Division

1. President

- a. Assumes and maintains overall responsibility for the Operational Quality Assurance Program.
- b. Delegates to a Vice President the responsibility for establishment, control and distribution of the Operational Quality Assurance Program, and revisions thereto.
- c. Establishes and enforces company policies in the area of Operational Quality Assurance.
- d. Establishes and implements an organization capable of and directed toward a proper Operational Quality Assurance Program.

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e. Resolves disputes between Quality Assurance/Quality Control personnel and other organizations, involving quality.

2. Senior Vice President

a. Reports to the President.

b. Provides for implementation of the Program within the Environmental Engineering, Fuel Cycle and Nuclear Engineering Departments.

c. Approves all changes to the Operational Quality Assurance Program.

3. Vice President

a. Reports to the President.

b. Establishes the qualification requirements for the principal Quality Assurance management positions to assure competence commensurate with responsibility. See Appendix A.

c. Provides for establishment of, and control and distribution of the Operational Quality Assurance Program and revisions thereto.

d. Provides for implementation of the Program within

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the Operational Quality Assurance Department.

- e. Approves all changes to the Operational Quality Assurance Program.
- f. Provides for a periodic review of the Operational Quality Assurance Program to determine the adequacy and effectiveness of the Program.
- g. Provides for independent verification of plant operation by individuals or groups who do not have direct responsibility for performing the work, to assure that applicable approved procedures, specifications, licenses and safety regulations are satisfied.
- h. Reviews or provides company policy relative to practices conducted at the Plant and Yankee Nuclear Services Division.
- i. Authorizes personnel performing Quality Assurance functions to have direct access to management levels which will assure accomplishment of quality-affecting activities.
- j. Ensures that personnel performing Quality Assurance functions have sufficient authority and organizational freedom to:

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- i. identify quality problems,
 - ii. initiate, recommend, or provide solutions through designated channels, and
 - iii. verify implementation of solutions.
 - k. Provides for review of and compliance with federal and state regulations and standards for nuclear power facilities.
4. Vice President - Operations
- a. Reports to the President.
 - b. Provides for implementation of the Program within the Plant Engineering and Operations Departments.
 - c. Approves all changes to the Operational Quality Assurance Program.
5. Manager of Operations
- a. Reports directly to the Vice President - Operations.
 - b. Provides for independent operational review and/or approval for selected plant repairs, and all changes.
 - c. Provides for review and approval of training programs, plant proced res, drawings, specifications and purchase requests.

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- d. Provides for interfacing between the Plant and the Yankee Nuclear Services Division.
 - e. Provides for and coordinates review of industry operating problems with the aim of minimizing likelihood of occurrence at the plant.
 - f. Evaluates plants' position of In-Plant audit discrepancies and prepares "Implementation Directives" to the plant.
 - g. Ensures that applicable Program procedures are implemented.
 - h. Reviews all changes to the Operational Quality Assurance Program.
6. Manager of Operational Quality Assurance
- a. Reports directly to the Vice President.
 - b. Assures that the Operational Quality Assurance Program satisfies the requirements of 10CFR50 Appendix B and ANSI N18.7-1976.
 - c. Provides for the review of design changes for specification and adequacy of quality requirements.

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- d. Provides for the evaluation, inspection and/or surveillance of contractor/vendor activities for operating plants to assure effective lines of communication and compliance with the applicable criteria of 10CFR50 Appendix B and ANSI N18.7-1976.
- e. Provides for the inspection, surveillance and/or audit of activities pertaining to plant repairs, and/or changes.
- f. Provides assistance as required to train, retrain and/or qualify plant and Operational Quality Assurance personnel in quality control and audit techniques.
- g. Ensures through verification that the Program is implemented for all activities requiring Quality Assurance.
- h. Provides for the stoppage of unsatisfactory work; and for the control of further processing, delivery, or installation of nonconforming material.
- i. Directs the independent verification of plant operational activities to assure that applicable approved procedures, specifications, licenses, and safety regulations are satisfied.
- j. Ensuring that the Program is modified and/or revised

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as standards, regulations and experience dictate.

7. Plant Engineering Manager

- a. Reports directly to the Vice President - Operations.
- b. Provides for the Plant Engineering review of design changes, material/service purchase requests, drawings, specifications and appropriate procedures.
- c. Provides for the quality assurance/quality control standards and/or requirements on all applicable documents.
- d. Provides for assistance in the training of plant personnel in areas of redesign.
- e. Coordinates the Plant Engineering requirements necessary to support changes related to the operation of the plant.

8. Operational Quality Assurance Coordinator

- a. As a member of the Nuclear Services Division Staff, coordinates the activities of the on-site representative of the Operational Quality Assurance Department.

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- b. Reports directly to the Manager of Operational Quality Assurance.
- c. Reports to the Manager of Operational Quality Assurance any discrepancy, or variance from the Operational Quality Assurance Program.
- d. Provides for the performance of an informal surveillance program to assure compliance with the provisions of the Operational Quality Assurance Program.
- e. Directs the scheduling and coordination of the In-Plant Audit Program including the follow-up of audit discrepancies.
- f. Provides for the preparation of audit check lists which encompass the 18 criteria of 10CFR50 Appendix B and ANSI N18.7-1976.
- g. Reviews the implementation of the Operational Quality Assurance Program for the purpose of improving the quality of Plant and Nuclear Services Division activities.
- h. Provides for a status of audits and recommendations concerning the implementing activities of the Operational Quality Assurance Program.

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- i. Establishes and maintains communication with Plant Management and the Nuclear Safety Audit and Review Committee in regard to activities necessary for implementation of the Operational Quality Assurance Program.
 - j. Provides for attendance at Plant Operations Review Committee meetings, in an advisory capacity, on matters relevant to continuation of a comprehensive Operational Quality Assurance Program.
9. Director of Environmental Engineering
- a. Reports directly to the Senior Vice President.
 - b. Follows and reviews radiation protection programs and activities at the plant.
 - c. Provides for technical assistance to the plant on matters of radiological protection.
 - d. Establishes and maintains radiological environmental surveillance programs concerning radioactive effluents from the plant.
 - e. Establishes Emergency Plan pursuant to state and federal regulatory requirements.

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- f. Reviews the plant meteorological monitoring data.
- g. Coordinates the engineering requirements necessary to support changes related to operation of the plant.

10. Fuel Cycle Manager

- a. Reports directly to the Senior Vice President.
- b. Performs fuel cycle and economic studies requested by management.
- c. Provides for the general supervision and coordination of all Core Component Design and Procurement, Nuclear Material Procurement and Fuel Cycle Economic activities.
- d. Ensures that the Operational Quality Assurance Program and the applicable procedures are implemented within the department.
- e. Issues bid invitations, evaluates proposals, and negotiates contracts for fuel cycle services and related material requirements.
- f. Coordinates the fuel cycle requirements necessary to support changes related to operation of the plant.

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11. Nuclear Engineering Manager

- a. Reports directly to the Senior Vice President.
- b. Performs nuclear engineering and economic studies requested by management.
- c. Provides for the general supervision and coordination of reactor physics, safety analysis, and research and engineering development activities.
- d. Ensures that the Operational Quality Assurance Program and the applicable procedures are implemented within the department.
- e. Coordinates engineering analysis requirements necessary to support changes related to operation of the plant.

Plant

1. Plant Superintendent/Assistant Plant Superintendent (Maine Yankee)

- a. Reports directly to the Manager of Operations.
- b. Directs the on-site implementation of the Operational Quality Assurance Program, including compliance with all State and Federal licenses and regulations.
- c. Acts as Chairman and Vice Chairman, respectively.

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of the Plant Operation Review Committee with authority and responsibility as established in the Technical Specifications of the plant operating license.

- d. Directs plant operations, maintenance, repair, refueling, and design changes.
 - e. Directs the control and surveillance of all special nuclear material at the plant site.
 - f. Directs necessary training and/or retraining programs.
 - g. Provides information and reports to the Yankee Nuclear Services Division as directed by the Manager of Operations.
 - h. Provides information and reports to the Nuclear Safety Audit and Review Committee as required and as directed by the Manager of Operations.
2. Plant Superintendent/Assistant Plant Superintendent (Vermont Yankee and Yankee Rowe)
- a. Same as 1(a) through (h).
 - b. Coordinates plant security activities with the Manager of Operations and his staff.

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3. Technical Assistant to the Plant Superintendent (Yankee
Rowe)

- a. Reports directly to the Assistant Plant Superintendent.
- b. Coordinates plant quality assurance activities with the Manager of Operations and his staff.
- c. Coordinates the reviews and updates of plant prints, drawings and specifications.
- d. Coordinates the review, revision and distribution of procedures.
- e. Schedules, prepares and retains specified plant reports and records.
- f. Coordinates material purchase requests with the Manager of Operations and his staff.
- g. Maintains and transmits information concerning plant changes to the Manager of Operations and his staff.
- h. Maintains and disseminates information regarding codes, criteria, standards, guidelines and policy to applicable plant personnel.
- i. Prepares, schedules and coordinates training for plant personnel.

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- j. Supervises implementation of the plant technical filing system.
- k. Maintains plant listings of design changes.
- 4. Assistant to Plant Superintendent (Maine Yankee)
 - a. Same as 3(b) through (k).
 - b. Reports directly to the Plant Superintendent.
 - c. Coordinate Plant Inservice Inspection Program.
- 5. Engineering Support Supervisor (Vermont Yankee)
 - a. Same as 3(a) through (k).
 - b. Directs the efforts of the Engineering Support Department to assure that plant design changes and alterations provide for adequacy of design, proper narration and/or documentation and review of potential unresolved safety issues.
 - c. Coordinates Plant Inservice Inspection Program.
- 6. Operations Supervisor (All Plants)
 - a. Reports directly to the Assistant Plant Superintendent.
 - b. Conducts plant operations in accordance with approved

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documents and specifications.

- c. Provides for system surveillance and operational testing.
 - d. Prepares documents outlining system functions and operating modes.
 - e. Assures that personnel under his supervision perform their duties according to applicable licenses, specifications, safety rules and regulations.
 - f. Provides Maintenance Requests for the repair or replacement of defective parts and/or components.
 - g. Verifies the operability of systems and/or components following maintenance, or changes by providing for the performance of written test documents which incorporate the requirements and acceptance criteria contained in applicable design documents.
 - h. Provides for the safe handling of core and reactor components during refueling operations.
7. Chemistry and Health Physics Supervisor (All Plants)
- a. Reports directly to the Assistant Plant Superintendent.
 - b. Directs maintenance of water conditioning in the

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primary and secondary plant as per specifications and/or documented and authorized recommendations.

- c. Directs a program to ascertain the radioactivity levels of liquids, gases and solids as required.
 - d. Directs the review and interpretation of chemistry test results.
 - e. Directs the documentation and maintenance of chemistry records for systems operations, refueling, plant modifications and/or additions which will reflect the degree of preventive maintenance required and/or in use as set forth in Technical Specifications, standards, and codes.
8. Instrumentation and Controls Supervisor (All Plants)
- a. Reports directly to the Assistant Plant Superintendent.
 - b. Establishes and directs an approved program of preventive maintenance, calibration, and testing of all instruments and controls as required by approved procedures.
 - c. Implements a continuing surveillance test program as outlined in the Technical Specifications.
 - d. Provides the technical requirements, specifications,

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and installation procedures for operational process control and instrumentation equipment changes.

9. Reactor Supervisor (Yankee Row.)

- a. Reports directly to the Assistant Plant Superintendent.
- b. Analyzes data from physics, thermodynamic and nuclear tests to verify plant operating parameters, guidelines, procedures and adherence to Technical Specifications.
- c. Prepares and maintains refueling procedures relative to core components handling and inspection.
- d. Prepares reactor physics test and core parameter measurement procedures.
- e. Provides supplemental technical information for new, modified and/or existing thermodynamic and data processing equipment.
- f. Maintains core component history file of all fuel, control rods, sources and incore detectors.
- g. Accounts for all special nuclear material at the plant site.
- h. Coordinates plant Inservice Inspection Program.

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10. Reactor and Computer Supervisor (Vermont Yankee)

a. Same as 9(a) through (g).

11. Reactor Supervisor (Maine Yankee)

a. Same as 9(a) through (g).

12. Maintenance Supervisor (All Plants)

a. Reports directly to the Assistant Plant Superintendent.

b. Prepares, schedules and directs approved maintenance activities.

c. Directs preparation of procedures utilizing sound engineering policies and practices for the installation of new material, equipment or spare parts.

d. Provides for implementation of approved procedures for material installation including documentation thereof.

e. Implements necessary data collection on systems and/or components for use as guideline in preventive maintenance and/or repair.

13. Administrative Supervisor (Yankee Rowe)

a. Reports directly to the Assistant Plant Superintendent.

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b. Supervises the Store Keeper who is responsible for:

- 1) Preparation of requisition for purchase orders.
- 2) The receipt, handling and storage of materials and equipment.
- 3) Administering a system of material and equipment identification.
- 4) Maintaining a system which provides traceability and retrievability of Quality Assurance documentation for purchased materials.

14. Administrative Supervisor (Maine Yankee)

- a. Same as 13(a) and (b).
- b. Coordinates plant security activities with the Nuclear Services Division Operations Department.

15. Administrative Supervisor (Vermont Yankee)

- a. Same as 13(b).
- b. Reports directly to the Plant Superintendent.

E. REVIEW AND AUDIT

Two committees have been established for each operating plant:

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whose objectives are to insure the plant is operated safely, utilizing good engineering practices. The committees are charged with making recommendations to modify operational methods or safety precautions when and if they become inadequate.

One Committee, the Plant Operations Review Committee, is made up of Plant personnel. The other Committee, the Nuclear Safety Audit and Review Committee, is made up of individuals not having line responsibility for the operation of the Plant.

1. Plant Operations Review Committee

a. Yankee Rowe Plant - See Section 6.5 "Review and Audit" of Appendix A Technical Specifications to the Operating License DPR-3.

b. Maine Yankee Plant - See Section 5.5 "Review and Audit" of Appendix A Technical Specifications to the Operating License DPR-36.

c. Vermont Yankee Plant - See Section 6.2 "Review and Audit" of Appendix A Technical Specifications to the Operating License DPR-28.

2. Nuclear Safety Audit and Review Committee

a. Yankee Rowe Plant - See Section 6.5 "Review and Audit" of Appendix A Technical Specifications to the Operating

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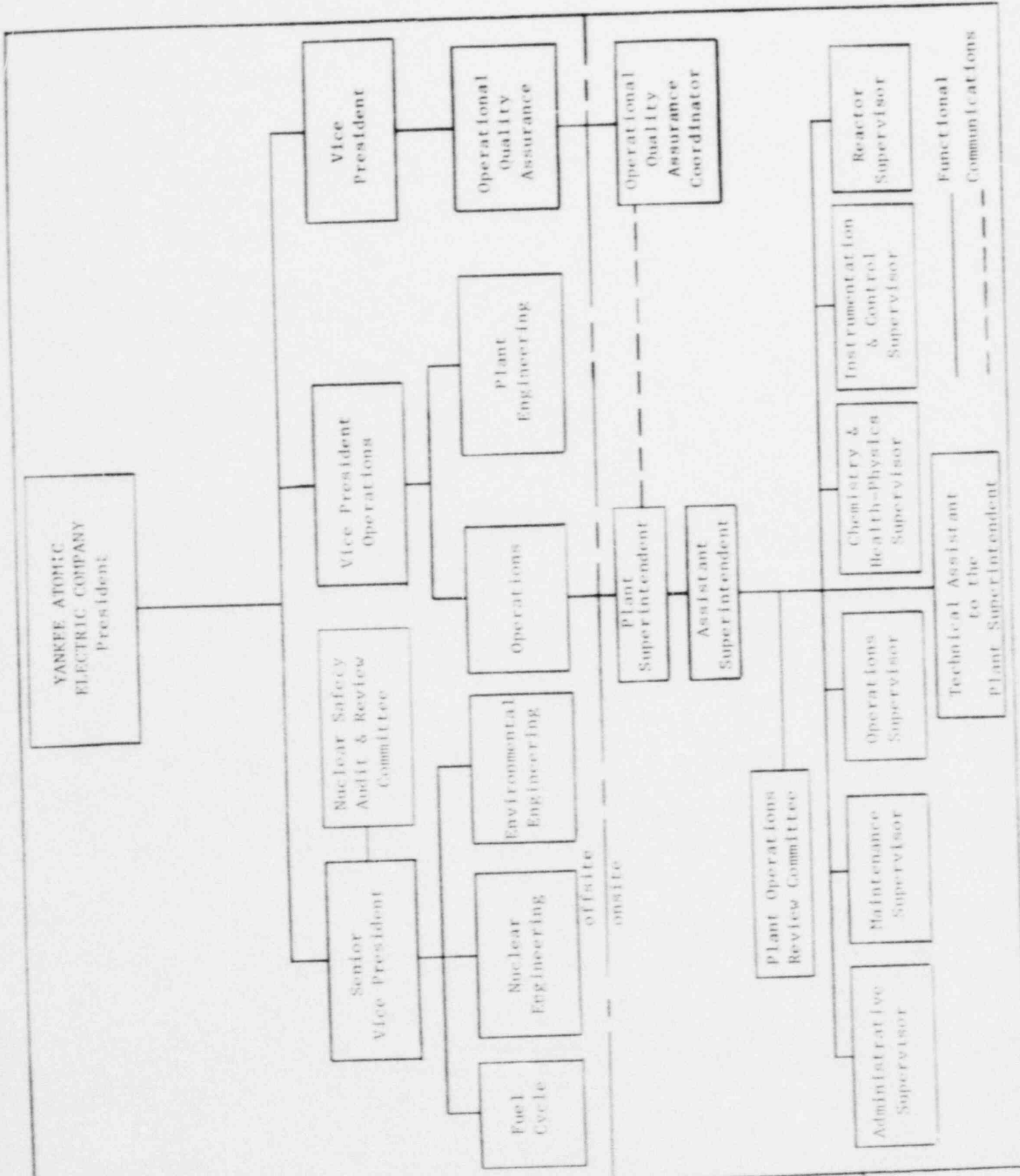
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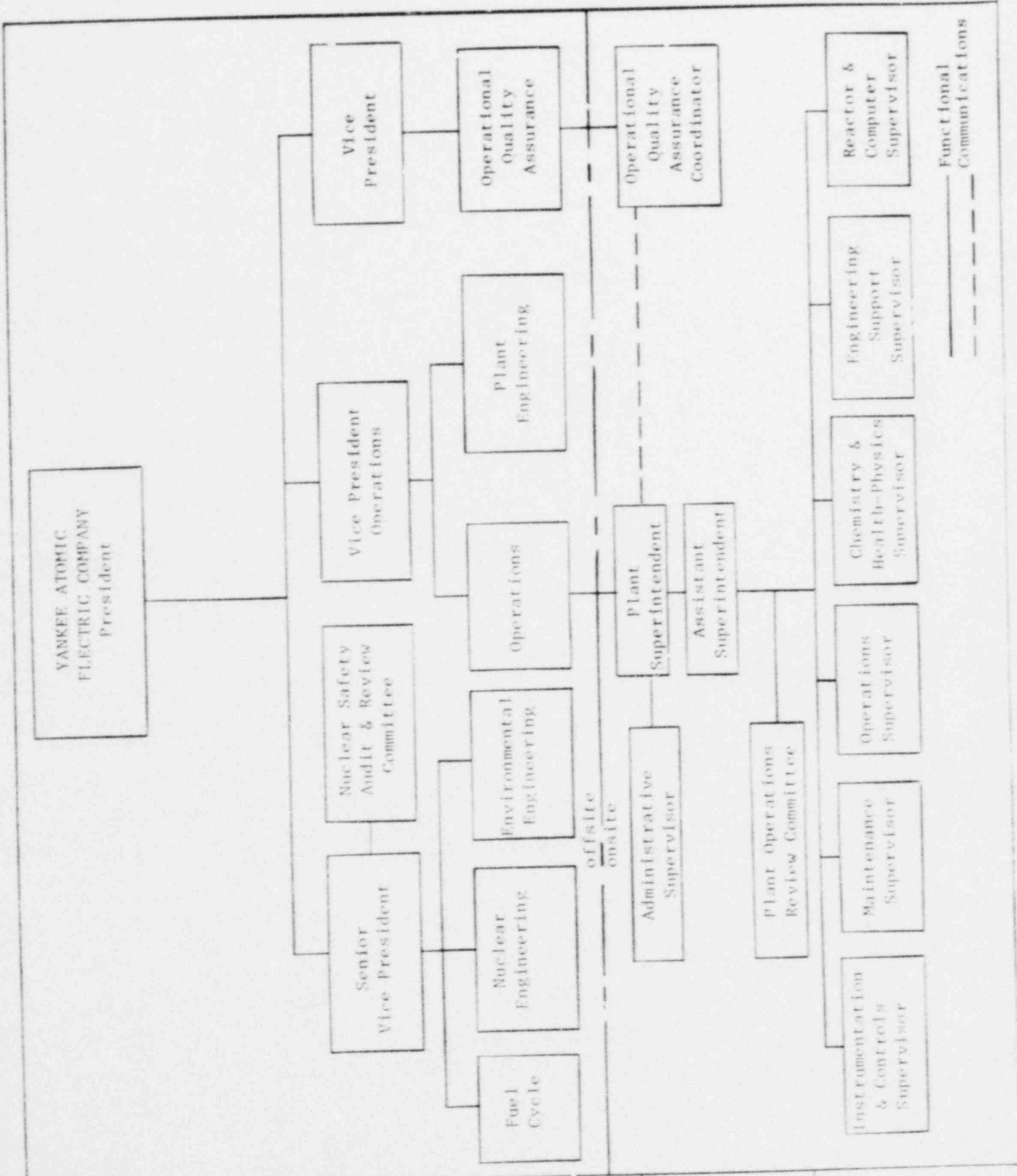
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b. Maine Yankee Plant - See Section 5.5 "Review and Audit" of Appendix A Technical Specifications to the Operating License DPR-36.

c. Vermont Yankee Plant - See Section 6.2 "Review and Audit" of Appendix A Technical Specifications to the Operating License DPR-28.

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Functional Communications

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NOTE: Each criterion section for the Program incorporates the designation of specific organizational responsibilities.

2. Individuals having direct responsibilities for establishment/distribution control/implementation of the Operational Quality Assurance Program are delineated in Section I "Organization" of the Program.

C. IMPLEMENTATION

Establishment of an effective Operational Quality Assurance Program is assured through consideration of and conformance, where applicable, with the below listed Federal documents; and ANSI standards. Implementation of this Program is assured through Quality Assurance procedures derived from Quality Assurance policies, goals and objectives. The Operational Quality Assurance Department shall review Quality Assurance program procedures to assure their derivation from the policies, goals and objectives established by the President.

1. Title 10 of the Code of Federal Regulations, Part 50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants

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requiring quality assurance which occur commencing 90 days after acceptance of the Program by the Nuclear Regulatory Commission.

- 5) Programmatic and organizational changes (other than those editorial in nature) made to Section I and II, respectively shall require Nuclear Regulatory Commission notification: programmatic changes prior to implementation and organizational changes within 30 days following the effective date of change.

*Exceptions and alternatives to the provisions contained in this Standard/Guide are detailed in Appendix B.

D. MANAGEMENT EVALUATION

The Cognizant Corporate Officer directs a thorough evaluation of the established Operational Quality Assurance Program by assigning the Nuclear Safety Audit and Review Committee the task of reviewing for compliance with and evaluating the effectiveness of quality related activities.

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E. TRAINING

1. The Manager of Operations is responsible for the indoctrination and training of his staff involved with activities affecting quality during plant operation.
2. The Plant Superintendent is responsible for the indoctrination and training of plant staff personnel performing activities affecting operations or requiring quality assurance, and for ensuring that, where required by the Technical Specifications, operators are formally licensed or qualified.
3. The Plant Engineering Manager is responsible for the indoctrination and training of Plant engineering personnel performing activities affecting quality in the design, test and operation phases.
4. The Director of Environmental Engineering is responsible for the indoctrination and training of Environmental Engineering Department personnel performing activities affecting quality in the design, test and operation phases.

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- a. Review of the recommendations of the Plant Operations Review Committee.
 - b. Review and approval of proposed plant changes.
5. The Nuclear Safety Audit and Review Committee shall be responsible for the review of plant changes.
6. The Manager of Operations and his staff shall be responsible for:
- a. Establishment of approved policy for processing material purchases, plant design changes and engineering design changes.
 - b. Review, approval and distribution of plant change documents.

C. IMPLEMENTATION

1. Satisfaction of this criterion shall be assured through the implementation of the Nuclear Services Division and/or plant actions listed below:
 - a. Correct translation of applicable regulatory requirements and design bases into specifications, drawings and written documents.

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2. The Plant shall be responsible for:

- a. The preparation, review, issue, and control of purchase documents.
- b. Preparation of detail as to how purchase documents are prepared, reviewed, approved, issued, and controlled.

3. The Nuclear Services Division Engineering Departments shall be responsible for:

- a. Preparation of engineering specifications which detail the technical and quality requirements for material, equipment and services.
- b. Initiation and/or review of purchase documentation for material, equipment, and services required for Plant changes.

4. The Manager of Operations and his staff shall be responsible for the review, approval and distribution of procurement documents.

C. IMPLEMENTATION

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| SECTION IV PROCUREMENT DOCUMENT CONTROL | 2 of 4 | 9 | 3/9/81 |

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- c. Maintenance and distribution of engineering specifications and drawings.
- 5. The Manager of Operations and his staff shall be responsible for:
 - a. A system of review and approval of Plant drawings and specifications.
 - b. Controlling the Nuclear Services Division Operations Department quality assurance documents.
- 6. The Vice President shall be responsible for establishing the means for the control and distribution of the Operational Quality Assurance Program, and revisions thereto.

C. IMPLEMENTATION

- 1. Satisfaction of this criterion shall be assured through the implementation of the Nuclear Services Division and/or plant actions listed below:
 - a. Review and approval of document changes by the same organizations that performed the original review and approval or by other responsible organizations delegated

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| SECTION VI DOCUMENT CONTROL | 3 of 5 | 9 | 3/9/81 |

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2. The Plant shall be responsible for:

- a. Preparation and approval of documents for the identification and control of materials, parts, and components.
- b. Maintenance of traceability of materials, parts, and components received, stored, installed, and used at the Plant.

3. The Nuclear Services Division Engineering Departments shall be responsible for assuring that specifications contain appropriate requirements for the identification and control of materials, parts, and components.

4. The Manager of Operations and his staff shall be responsible for providing review and approval of documentation, including identification control requirements for the purchase of materials, parts, and components.

C. IMPLEMENTATION

- 1. Satisfaction of this criterion shall be assured through the implementation of the Nuclear Services Division and/or plant actions listed below:

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| SECTION VIII IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS | 2 of 3 | 9 | 3/9/81 |

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4. The Manager of Operations and his staff shall be responsible for review and approval of purchase documentation for special process material.

C. IMPLEMENTATION

1. Satisfaction of this criterion shall be assured through the implementation of the Nuclear Services Division and/or plant actions listed below:
 - a. Qualification records of documents, equipment, and personnel connected with special processes in accordance with applicable codes, standards, and specifications.
 - b. Special processes accomplished in accordance with written process sheets or equivalent with recorded evidence of verification.
 - c. Maintenance and updating of qualification records of special process documents, equipment, and personnel.

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| SECTION IX CONTROL OF SPECIAL PROCESSES | 3 of 3 | 9 | 3/9/81 |

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2. The Nuclear Services Division Engineering Departments shall be responsible for:
 - a. Review of nonconforming items which cannot be corrected by vendor action.
 - b. Preparation or approval of implementing documents for repair and/or rework of nonconforming items.
3. The Manager of Operations and his staff shall be responsible for preparation of documents to be followed in the review and resolution of nonconforming items, services, or activities.
4. The Plant shall be responsible for:
 - a. Writing implementation documents for the identification, documentation, and corrective action for all material, installation, testing, operation, and/or surveillance nonconformances.
 - b. Establishment of measures to provide for the documented control of nonconforming materials, parts, and components.

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| SECTION XV NONCONFORMING MATERIALS, PARTS, AND COMPONENTS | 2 of 4 | 9 |

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2. The Manager of Operations and his staff shall be responsible for:
 - a. Review of adverse conditions reported by the Plant.
 - b. Coordination of comments between the Nuclear Services Division Engineering Departments and the Plant.
 - c. Review of corrective action taken by the Plant.
3. The Plant shall be responsible for:
 - a. Identification of causes of conditions adverse to quality.
 - b. Implementation of the corrective action.
 - c. Documentation of corrective action taken.
4. The Nuclear Services Division Engineering Departments shall be responsible for:
 - a. Review of conditions adverse to quality which involve design deficiencies to determine the cause of the condition.
 - b. Recommendations of corrective action to preclude repetition of design deficiencies.

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| SECTION XVI CORRECTIVE ACTION | 2 of 3 | 9 |

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- c. Provision of facilities to prevent deterioration or loss of documentation.
 - d. Provision of a system for the review, approval and retention of plant prepared documents such as reportable occurrences, technical reports, required records and the meeting minutes of official committees.
3. The Nuclear Services Division Engineering Departments shall be responsible for establishing a system of review, approval and retention of documents relating to quality assurance for the operation of the department.
4. The Vice President shall be responsible for control and distribution of the Operational Quality Assurance Program and revisions thereto.

C. IMPLEMENTATION

1. Satisfaction of this criterion shall be assured through the implementation of the Nuclear Services Division and/or plant actions listed below:

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| SECTION XVII QUALITY ASSURANCE RECORDS | 3 of 7 | 9 | 3/9/81 |

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- d. Preparing information regarding the In-Plant Audit Program for review by the Nuclear Safety Audit and Review Committee.
 - e. Performing random informal surveillance of plant activities.
 - f. Performing evaluations of vendors.
 - g. Following up of discrepancies discovered during audits.
 - h. Making recommendations to preclude possible audit discrepancy repetition.
2. The Nuclear Services Division Engineering Departments shall be responsible for periodic audits to insure that engineering department personnel understand and implement the engineering procedures.
3. The Manager of Operations and his staff shall be responsible for:
- a. Evaluation of plant position on In-Plant Audit Program discrepancies.
 - b. Preparation of "Implementation Directive" to the Plant on resolution of discrepant items.

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ANSI N45.2.2 (cont.)

E. Exception

Subsection 5.2.3 - Special Inspection

The Yankee operating plants take exception to attaching special inspection procedures to the item or container.

Alternative

Special inspection procedures shall be readily available to personnel performing inspections.

Justification

Procedures are subject to less abuse and more stringent controls when maintained on file and not attached to the item. Inspection status is maintained by tagging and procedure control.

F. Exception

Subsection 6.1.2 - Levels of Storage

The Yankee operating plants take exception to two specific requirements associated with fuel storage (classified level A).

Alternative

The Yankee operating plants shall meet the requirements of level A storage for new fuel with the exception of special air filtering; and temperature and humidity controls.

Justification

The existing storage conditions at the Yankee operating plants are consistent with the protection provided to the fuel while in storage at the manufacturer (vendor) and/or while in transit to the plant site and are judged to provide adequate protection to the fuel assembly structure which is of highly corrosion resistant materials. We believe that the above listed requirements are intended for application at the manufacturing facility (vendor) where the uranium pellets may be exposed to the atmosphere and not in its fully encapsulated, and therefore, fully protected form in a completed fuel assembly.

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ANSI N45.2.2 (cont.)

G. Exception

Appendix A-3 Subsection A3.5.1(1) - Caps & Plugs

The Yankee operating plants take exception to the requirement that non-metallic plugs and caps shall be brightly colored.

Alternative

Non-metallic plugs and caps shall be of a contrasting color.

Justification

The purpose of utilizing brightly colored plugs and caps is to assist in assuring obstructions are not inadvertently placed in operating components or systems. By using plugs and caps of a contrasting color this objective can be achieved.

H. Exception

Appendix A-3 Subsection A3.9(1) - Second Group, Markings

The Yankee operating plants take exception to the requirement that container markings shall appear on a minimum of two sides.

Alternative

Containers shall be adequately marked to provide identification and retrievability.

Justification

Containers are tagged to provide identification and inspection status. Employment of two tags on small containers adds bulk and confusion and does not provide for better identification or traceability.

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ANSI N45.2.2 (cont.)

I. Exception

Appendix A-3, Subsection A.3.9(4) - Second Group, Marking

The Yankee operating plants take exception to the requirement that container markings shall be not less than 3/4" high container permitting.

Alternative

Container markings shall be of a size which permits easy recognition.

Justification

Markings were intended to provide identification and instructions. The criteria should be that the markings clearly provide the same.

J. Exception

Appendix A-3 Subsection A.3.9(6) - Second Group, Marking

The Yankee operating plants take exception to the information required for container marking.

Alternative

Marking shall be adequate in each case to provide identification, traceability and instructions for special handling, as applicable.

Justification

The information required is excessive. Cluttering a container with excessive markings only reduces the main objectives, maintaining identification and establishing special controls.

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