

ENCLOSURE A  
TO NMPIL 0768

**NINE MILE POINT - UNIT 1**

**SAFETY EVALUATION SUMMARY REPORT**

**1993**

Docket No. 50-220  
License No. DPR-63

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Safety Evaluation No.: 83-044  
Implementation Document No.: Mod. N1-81-29  
UFSAR Affected Pages: VI-63 (Figure VI-24)  
System: Emergency Ventilation  
Title of Change: Modify BV 202-36 Pilot  
Solenoid Design

**Description of Change:**

This change replaced the solenoid pilot valves on air-operated blocking valve BV 202-36 with a different model, re-piped the air input to the solenoid valves in a series configuration (previously a parallel configuration), and installed a keylock switch in place of the original manual switch for the solenoid valves. Procedural controls will govern the use of the switch. Normally, the blocking valve will be left open. This will prevent the failure of initiation of the emergency ventilation system. Closure of the blocking valve will be allowed only during venting and purging of the drywell and suppression chamber or for maintenance reasons under procedural control.

**Safety Evaluation Summary:**

Automatic blocking valve BV 202-36 is at the junction or interface of the emergency ventilation and normal ventilation systems. The valve provides for purging the torus and drywell through the emergency ventilation system at the same time normal building ventilation is being used. The blocking valve prevents contaminated air from being blown back into the reactor building during this condition.

The new configuration of the air piping for the solenoids prevents single failure of the emergency ventilation system. The added procedural controls governing use of the keylock switch and maintaining the valve normally open assures the availability of the emergency ventilation system.

The modification will not affect the designed operation of the emergency ventilation system or the normal ventilation system. Venting and purging of the drywell and suppression chamber will not be affected except for the added procedural control.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 89-026, Rev. 1  
Implementation Document No.: Mod. N1-86-020  
UFSAR Affected Pages: VI-43, VI-43a, VI-43b, VI-47  
(Table VI-3a), VI-48 (Table  
VI-3a), VI-48a (Table VI-3a),  
VI-49 (Table VI-3b), VI-50  
(Table VI-3b), VI-50a (Table  
VI-3b), VI-50b (Table VI-3b),  
VI-51 (Table VI-3c)  
System: 201.1  
Title of Change: Air-Operated Containment Vent  
& Purge Valves

**Description of Change:**

The NRC required NMPC to reduce the air-operated containment vent and purge valve isolation system response time to 15 seconds or less to assure that safety-related purge/vent valves would be closed before the onset of any potential fuel failure following a loss-of-coolant accident (LOCA). NMPC interpreted this requirement as the need to limit disc travel (i.e., valve closure) time to 14 seconds or less under LOCA conditions.

To meet the valve closure time requirement, Modification No. N1-86-020 removed speed control valves from vent and purge valves IV 201-08, 201-10, 201-16, and 201-32. Removal of the speed control valves reduced the line resistance, thus allowing air to exhaust in a shorter time and hence close the isolation valves more quickly.

To further reduce butterfly valve closure time for valves IV 201-10 and 201-32, quick exhaust valves (QEVs) were added to their air lines between the solenoid valves and the air operators. Quick exhaust valves are used in similar applications at Nine Mile Point Unit 1 and have performed their function satisfactorily.

**Safety Evaluation Summary:**

The analyses performed addressed the addition of QEVs to IV 201-10 and 201-32. The removal of the already wide open speed control valves from IV 201-08, 201-10, 201-16, and 201-32 was judged to have no impact on safety as they do not act as pressure or containment barriers/boundaries. Also, as the removal of the speed control valves resulted in one less component that

Safety Evaluation No.: 89-026, Rev. 1 (cont'd.)

Safety Evaluation Summary: (cont'd.)

potentially could fail, the probability of a malfunction of equipment important to safety is reduced.

Based on the analyses and evaluations performed, this modification (1) does not increase the probability of occurrence or consequences of an accident previously evaluated in the FSAR; (2) does not create the possibility of an accident of a different type than any evaluated previously in the FSAR; and (3) does not reduce the margin of safety as defined in the basis contained in the Technical Specifications. Therefore, it is concluded that this modification does not involve an unreviewed safety question.

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Safety Evaluation No.: 89-029, Rev. 1 & 2  
Implementation Document No.: Mod. N1-89-209  
UFSAR Affected Pages: VI-58 (Figure VI-22); X-21  
System: Head Spray  
Title of Change: Partial Removal of the Head  
Spray Piping

**Description of Change:**

As reported in letter NMP1L 0589, dated June 28, 1991, the reactor head spray cooling system was eliminated by permanently removing the spool piece in the discharge line to the reactor vessel head. The remaining system piping was blind flanged (including the portion that contains the containment isolation valves).

This revision of the Safety Evaluation addressed Appendix J leak test requirements for the subject containment penetration. Isolation valves 34-01 and 34-02 are no longer subject to Appendix J Type C testing. The new blind flange is subject to Appendix J Type B testing for gasketed penetrations.

**Safety Evaluation Summary:**

The head spray system was not required to operate under any shutdown, cooldown, accident, or transient conditions. This flow path was also not required to satisfy Appendix R cold shutdown inventory makeup requirements.

Reactor isolation now occurs at the blind flange at the reactor vessel head. Containment isolation occurs at the blind flange inside the inboard check valve 34-02. Appendix J Type B and Type A testing of the blind flange assures that primary containment integrity is maintained.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 89-030, Rev. 1  
Implementation Document No.: Mod. N1-89-215  
UFSAR Affected Pages: N/A  
System: 125Vdc Battery Boards  
Title of Change: Installation of Class 1E Fuses  
at 125Vdc Battery Boards #11  
and #12

**Description of Change:**

This modification upgraded the equipment which feeds the loads powered from the 125Vdc battery boards #11 and #12. Originally, these loads were fed through circuit breakers. The modification replaced the breakers with fuses that are sized to clear a fault for the maximum available short circuit current.

This safety evaluation was previously reported in letter NMP1L 0512 dated June 29, 1990. Revision 1 of the safety evaluation revised the fuse interrupting rating (from 200KA ac/40KA dc to 25KA dc) and the applicable National Electric Code year (from 1987 to 1990).

**Safety Evaluation Summary:**

The revision to the Safety Evaluation does not affect the original conclusions. The deletion of the breakers and the addition of fuses will not increase the probability of occurrence of an accident previously analyzed in the UFSAR, nor will it decrease the margin of safety at Nine Mile Point Unit 1.

Replacement of the breakers with qualified fuses ensures that adequate short circuit interrupting capability is provided.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 90-003, Rev. 1  
Implementation Document No.: Calc. A-10.1-AA-26, Rev. 1  
UFSAR Affected Pages: N/A  
System: N/A  
Title of Change: NMP1/NMP2 Helicopter  
Operations

**Description of Change:**

NMPC helicopter services provide local transportation between the site and surrounding areas including Syracuse Hancock Airport. This safety evaluation reviews the acceptability of this type of operation in the context of aircraft hazards. Helicopter operations involve approximately 45 to 60 flights per year between the Syracuse Airport and the site. The flight path usually does not encroach on the air space above the site security fence.

**Safety Evaluation Summary:**

There are currently three helicopter landing areas, all within approximately 0.5 miles of the site:

1. In the parking area, approximately 1200 ft. southeast of the Unit 2 reactor building.
2. In the parking area adjacent to the training center.
3. In the lawn area adjacent to the training center.

A calculation performed for Unit 2, based on the NRC Standard Review Plan 3.5.1.6 methodology, concluded that the actual probability of a helicopter accident leading to radiological consequences in excess of 10CFR100 limits would be less than about  $10^{-7}$  per reactor year. A similar calculation was not performed for Unit 1. However, if such a calculation were performed for Unit 1 structures, the results would yield probabilities of the same order of magnitude as calculated for Unit 2. Therefore, helicopter operations do not represent a credible hazard to Unit 1 and need not be considered in the plant design basis. Based on the analyses and evaluations performed, it is concluded that NMPC helicopter operations do not constitute an unreviewed safety question.

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Safety Evaluation No.: 90-006  
Implementation Document No.: Mod. N1-89-255  
UFSAR Affected Pages: VI-49 (Table VI-3b)  
System: Drywell Inerting and  
Containment Atmospheric  
Dilution (201)  
Title of Change: Modify Closure Time for Vent  
and Purge Motor-Operated  
Valves

**Description of Change:**

This change modified the motor operators on safety-related vent and purge isolation valves numbers 201-07, 201-17, 201-31 and 201-09, to reduce the stroke time for valve closure from less than 60 seconds to less than 30 seconds. Closing time reduction was accomplished by increasing motor power output and/or reducing the gear ratio to increase output rpm.

**Safety Evaluation Summary:**

This reduction in stroke time addresses concerns originally raised by the NRC per NRC Safety Evaluation, "Containment Purging/Venting During Normal Plant Operation," issued March 19, 1984; NRC Safety Evaluation, "Radiological Consequences Analysis of LOCA During Containment Purging," issued December 8, 1983; and final resolution of the issue reached via NMPC letter to NRC dated May 29, 1986. Specifically, the reduction in stroke time will reduce the consequences of a radiological release.

Upgrade of these safety-related valves was accomplished utilizing qualified Limitorque parts installed in the same configuration as originally existed. In addition, on valves 201-07 and 201-17, where motor size has been increased, calculations have concluded that existing conductors and breakers are adequate to handle the anticipated increased power loads.

The NRC accepted the new surveillance criteria associated with this change in License Amendment No. 140, dated April 12, 1993.

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Safety Evaluation No.: 91-011  
Implementation Document No.: DCR N1-91-001LS036  
UFSAR Affected Pages: Figure IX-1  
System: 24-kV Electrical System  
Title of Change: Revise Figure IX-1 in NMP1  
FSAR

**Description of Change:**

This change corrected a discrepancy involving the location of the termination between the auxiliary power station service transformer #10 cables and the 24-kV main generator output leads. Drawing C-19409-C Sheet 1B E21.1 originally showed the termination made at the main generator side of the links. The correct termination should be shown on the main transformer side of the links.

This safety evaluation is being reported at this time in support of the change to UFSAR Figure IX-1, which was incorporated in UFSAR Revision 10.

**Safety Evaluation Summary:**

This is a documentation-only change to properly reflect the as-built field configuration. The plant design basis, procedures, and analyses are not affected. The corrected termination location will not prevent cables feeding the station service transformer #10 from performing their intended function. The 24-kV electrical system is not safety related.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-012, Rev. 1  
Implementation Document No.: SC1-0093-91  
UFSAR Affected Pages: VI-50 (Table VI-3b)  
System: Postaccident Sampling (PAS)  
Title of Change: Impact of Leaving Isolation  
Valves 63-04 and 63-05  
Normally Open

**Description of Change:**

Isolation valves 63-04 and 63-05 are located in the discharge return line to the torus for the PAS system. These valves also provide a path for discharging fluid to the torus from relief valve 122.1-03. This relief valve serves as an overpressure protection device for the low pressure portion of the PAS system. This change revises the position of valves 63-04 and 63-05 from normally closed to normally open.

**Safety Evaluation Summary:**

Most of the PAS system is designed for the full reactor pressure of 1200 psig. However, the portion of this system between valves BV 122-05 and BV 122-06 is designed for 250 psig, and piping between safety valve 122.1-03 and isolation valve 63-05 is designed for 150 psig. Keeping valves 63-04 and 63-05 open will ensure proper operation of relief valve 122.1-03 and will ensure that the design pressure of this portion of the system is not increased as a result of leakage of valves isolating this portion of the system from the high reactor pressure.

Isolation valves 63-04 and 63-05 are open during normal plant operation when there is flow through the PAS system, and hence keeping these valves open during normal operation will not impact nuclear safety in a way not previously evaluated. Also, the reactor protection system will ensure closing of these valves during an accident condition.

Leakage of reactor coolant through the blocking valves into the PAS system piping is not considered significant, though contamination may slightly increase.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-013, Rev. 1  
Implementation Document No.: DCR N1-90-001LS935  
UFSAR Affected Pages: X-46 (Figure X-9)  
System: Instrument Air  
Title of Change: Reconciliation of As-Built and Design Documentation for the Removal of Instrument Air Compressor/Intercooler (EPN 94-01, 02) Ball Valves

**Description of Change:**

This change deleted the ball valves that are shown on design drawings as being installed on the upstream side of each intercooler provided with instrument air compressors 94-01 and 94-02 (EPNs). These ball valves are indicated in the design documentation as being furnished and installed by the air compressor/intercooler vendor. However, during a recent plant walkdown, it was discovered that these subject ball valves were not installed.

**Safety Evaluation Summary:**

Deletion of the ball valves is a documentation-only change to reflect the as-built condition of the plant, and will not affect operation of the air compressor intercoolers. Review of the system operating and maintenance procedures indicates that these ball valves are not needed for system operation or maintenance. Alternate valves are installed and are used to provide positive equipment isolation for maintenance purposes.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-015, Rev. 1  
Implementation Document No.: Mod. N1-88-091  
UFSAR Affected Pages: N/A  
System: Motor-Generator (MG) Set  
Title of Change: Modification Acceptance Test  
for Static Battery Chargers  
161A and 171A (N1-STP-16)

**Description of Change:**

Special test procedure N1-STP-16 was generated to verify the operability of static battery chargers 161A and 171A, installed under Modification N1-88-091, as operational backups to the battery charging MG sets. The MG sets (one train at a time) were removed from service to allow the static battery chargers to maintain dc load and charge each battery. This required entry into a 24-hour limiting condition of operation (LCO) for each train per Technical Specification Section 3.6.3. A wiring change in each MG set control panel was also required to allow performance of the tests.

**Safety Evaluation Summary:**

The substitution of a static charger for a MG set during the test is functionally a one-for-one equipment substitution with equivalent electrical characteristics and greater reliability. The battery continues to be capable of supplying dc load throughout the test, and operation of the battery system remains the same regardless of whether the static battery charger or MG set is in service. Any dc transients that may occur during the test were evaluated and would not affect the MG set. If the static charger fails the acceptance for any reason and the MG set cannot be returned to service, the plant will be shut down in accordance with the Technical Specification LCO.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-023

Implementation Document No.: Calcs. SO-TORUS-M009,  
SO-TORUS-M010, S14-81,  
S14-81-F009; GE Report  
GENE-770-91-34

UFSAR Affected Pages: VII-2, VII-11, VII-13a,  
VII-16, VII-18; XV-159,  
XV-160, XV-164, XV-166,  
XV-167, XV-169, XV-169a,  
XV-169b, XV-169c, XV-169d,  
XV-169e, XV-169f, XV-169g,  
XV-169h, XV-169i, XV-169j,  
XV-169k, XV-169L (F XV-60a),  
XV-169m (F XV-60b); XVI-104,  
XVI-114

System: Containment Spray

Title of Change: Heat Removal Capacity of the  
Containment Spray System Based  
on the Design Basis  
Reconstitution LOCA  
Suppression Chamber  
Temperature Response Analysis

**Description of Change:**

The original FSAR suppression chamber heatup analysis was performed between 1965 through 1968. Documentation of this analysis was not adequate to fully capture the original methods and assumptions. Therefore, the design basis reconstitution (DBR) analysis of the DBA LOCA suppression chamber heatup was performed using NRC-approved methods.

The DBR suppression chamber heatup analysis resolved four items, identified as problems, in the areas of (1) heat exchanger fouling, (2) maximum lake water temperature, (3) spray system flow requirements, and (4) decay heat calculation.

The DBR suppression chamber heatup analysis results were previously reported in letter NMP1L 0676, dated June 29, 1992, under Safety Evaluation 91-028, which specifically addressed the effects of increased lake water temperature.

**Safety Evaluation Summary:**

The DBR analysis evaluated the containment suppression chamber heatup assuming the containment spray system is operated in the

Safety Evaluation No.: 91-023 (cont'd.)

Safety Evaluation Summary: (cont'd.)

drywell and wetwell spray mode and also operated in accordance with the Emergency Operating Procedures (EOPs).

Results of the DBR analysis for 82°F lake temperature yielded a peak calculated suppression chamber temperature of 158.9°F if the following operability requirements are imposed:

1. Minimum downcomer submergence of 3.5 ft. and a maximum torus water temperature of 85°F.
2. The containment spray heat exchanger is initiated within 15 minutes post-LOCA.
3. Containment spray pump flow rate is 3600 gpm.

The DBR analysis results conclude that all design criteria associated with maximum torus water temperature are satisfied at the calculated peak temperature of 158.9°F.

The analysis included the effects of the increased peak torus temperature on the torus design, piping design conditions, Mark I loads, containment and core spray pumps NPSH and seal design, core cooling capability of core spray, and drywell and wetwell maximum pressures.

Based on the evaluation performed, it is concluded that the containment spray system continues to be operable. This change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-025, Rev. 0, 1, & 3  
Implementation Document No.: Calc. S14-81-F022, EOP 2  
UFSAR Affected Pages: N/A  
System: Core Spray  
Title of Change: Assuring Adequate NPSH to the  
Core Spray Pumps During  
Long-Term Post-LOCA Operation  
After the Core is Covered by  
Removing Core Spray Topping  
Pumps from Service

**Description of Change:**

This change revised the emergency operating procedures (EOPs) to permit the core spray topping pumps to be removed from service during long-term postaccident cooling. This maneuver will lower system flow and help to assure that the core spray pumps have adequate net positive suction head (NPSH) and operate below the shockless capacity of the pumps. Operating at the lower flow rate will prevent possible accelerated erosion of the core spray pump impeller.

**Safety Evaluation Summary:**

The topping pumps will not be removed from service until the reactor vessel pressure has deteriorated (less than 30 psig) and the core is covered, and the only need for injection is to maintain level. The topping pump and its associated components will not be damaged in this mode of operation and the safety function of the core spray system will be satisfied. Removing the topping pump from service does not disable it permanently. If an operator feels the need to restart the topping pump, it can be reinitiated.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-030  
Implementation Document No.: DCR N1-91-800LG002  
UFSAR Affected Pages: VII-26  
System: Liquid Poison  
Title of Change: Reconcile Licensing and Plant Documentation to Concur with Design Documentation and the As-Built Condition for the Liquid Poison System Pressure Relief Valves

**Description of Change:**

This change establishes the setpoint of the liquid poison system safety relief valves as 1500 psig  $\pm$  3% in accordance with the valve nameplate and ASME Section VIII Division 1 Part UG-133(f) - 1971 for tolerance. Also, the design discharge pressure of the liquid poison pumps is revised from 1500 psig to 1670 psig.

**Safety Evaluation Summary:**

The setpoint of 1500 psig  $\pm$  3% is appropriate to safely perform the function of these valves, which is to protect the pumps and associated piping from damage due to overpressure. The pumps are designed to operate and deliver their safety function flow for discharge pressures as high as 1670 psig. The associated piping has been qualified for pressures up to 1750 psig. The highest possible system pressure with the setpoint at 1500 psig  $\pm$  3% is 1638 psig, taking into account setpoint error, elevation head, backpressure and 3% accumulation.

Thus, the new setpoint will maintain pressures within ANSI(ASA)-B31.1-1955 limits.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-037, Rev. 0, 1 & 2  
Implementation Document No.: Temp. Mod. 5347  
UFSAR Affected Pages: N/A  
System: Radwaste Disposal  
Title of Change: Temporary Modification 5347:  
Installation of (MFTDS)  
Filters and Demineralizers

**Description of Change:**

In order to facilitate the replacement of the #12 concentrator circulating pump (EPN 45-217), the modular fluidized transfer demineralization system (MFTDS) was installed to maintain the operability of the #12 concentrator portion of the radwaste system.

The MFTDS consisted of a series of four vessels (1 filter and 3 demineralizers) which diverted the effluent of waste concentrator #12 to the waste collector tank. This assembly was located in the Dow seamer and drum storage area, on the 261' elevation of the waste building.

**Safety Evaluation Summary:**

The MFTDS was installed in accordance with established site procedures and meets the design requirements for the radwaste system. Process control instrumentation and periodic waste samples assure proper operation of the MFTDS. Personnel radiation exposures are maintained ALARA by the installation of shielding and by controlling access to the MFTDS equipment area. Rupture of a system hose during the filter/demineralizer process is bounded by a tank rupture as described in UFSAR Section XII-A.2.2. Any dispersed liquid from a hose leak can readily be recovered and processed through the floor drain system.

Based on the evaluation performed, it is concluded that this temporary change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-040, Rev. 1  
Implementation Document No.: Simple Design Change  
SC1-0266-91  
UFSAR Affected Pages: VIII-38 (Figure VIII-14),  
VIII-39  
System: In-core Monitoring  
Title of Change: APRMs 11-18 Scram/Rod Block  
Setpoint

**Description of Change:**

This change revised the flow-biased rod block and scram setpoints for average power range monitors (APRMs) R102A through D from 107% and 118.5% to 106% and 116%, respectively. This setpoint revision was required since the calibration frequency of APRM flow units R103A through D was revised from once a month to once every 3 months per Technical Specification Amendment No. 130. Revising the calibration frequency for the flow units affects these setpoints since the APRMs receive their flow-biasing signals from the flow units.

**Safety Evaluation Summary:**

The new setpoints were calculated by calculation SP-APRM-R102A-D. A margin was developed by considering instrument inaccuracy, calibration uncertainty and drift, and was then subtracted from the analytical limit to come up with the required setpoint. These setpoint revisions ensure safe operation and shutdown of the plant by causing the APRM flow-biased rod block and scram to occur below the Technical Specification limits of 110% and 120%, respectively.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-041  
Implementation Document No.: N/A  
UFSAR Affected Pages: N/A  
System: Reactor Manual Control  
Title of Change: Dual Control Rod Selection

**Description of Change:**

On December 16, 1989, an operator at the Oyster Creek Nuclear Station inadvertently selected two control rods during a rod withdrawal. This was attributed to mechanical problems within the reactor manual control system.

The purpose of this evaluation was to determine whether the potential for dual rod selection represented an unreviewed safety question for Unit 1.

**Safety Evaluation Summary:**

The dual control rod withdrawal concern was evaluated for any impact on the continuous control rod withdrawal transient and the control rod drop transient. The evaluation concluded that the dual control rod selection scenario does not represent a safety concern because the probability of occurrence is small and the consequences are small since reactor scram on high neutron flux protects the reactor core. Additional administrative controls and operator training as a result of the Oyster Creek event have been implemented to ensure proper rod selection withdrawal.

Based on the evaluation performed, it is concluded that continued operation of Unit 1 in its current configuration does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-043, Rev. 1 & 2  
Implementation Document No.: Major Order No. 0546  
UFSAR Affected Pages: III-3 (Figure III-1)  
System: N/A  
Title of Change: New York Telephone Switch  
Building at Nine Mile Point  
Unit 2

**Description of Change:**

The original telephone system on site was inadequate to meet the needs of site personnel. A new single switch replaced the two switches previously in use at Units 1 and 2. The new system is housed in a new building outside the protected area, west of the east flood control berm at Unit 2.

**Safety Evaluation Summary:**

The new single switch facilitates the entire site telephone system as well as meeting the future of data communication. The new building is not within the direct flow path of flood waters, and thus will have no adverse impact on the probable maximum precipitation (PMP) flood study.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 91-069  
Implementation Document No.: N/A  
UFSAR Affected Pages: III-3 (Figure III-1)  
System: N/A  
Title of Change: Nine Mile Point Unit 2 Site  
Paving and Drainage

**Description of Change:**

This change regraded and paved the parking lot south of the "P" building (an area of approximately 16,000 square yards). Drainage of the swale south of the parking area, running to the east and then to the north, was also improved by lining with geotextal fabric and cobblestone. The existing culvert under the east service road was abandoned. A 12'-0" paved turning lane was also added to Lake Road between the warehouse road and the east service road.

**Safety Evaluation Summary:**

The paved turning lane improves the flow of traffic into and out of the plant. Paving the parking lot eliminates the possibility of personnel injury due to loose rocks and standing water conditions. A review of the flood study calculations determined that this change improves site drainage and has no adverse effect on the probable maximum precipitation flood elevation.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-001  
Implementation Document No.: Mod. N1-90-010  
UFSAR Affected Pages: N/A  
System: Fire Protection  
Title of Change: Fire Panel Overheating

**Description of Change:**

This modification enhanced the mechanical ventilation of the local fire control panels (LFCPs) to prevent the overheating of temperature-sensitive equipment, thereby improving the reliability of the panels. Additional exhaust fans and intake filters were installed on each cubicle of each LFCP. These changes improved air flow through each cubicle, thereby improving the cooling of the LFCP internals.

**Safety Evaluation Summary:**

This change does not alter any safety function described in the UFSAR and does not adversely affect the Unit 1 fire protection program. This modification not only improves the reliability of the LFCPs, but the plant fire protection system as a whole. The equipment added by this modification does not interconnect with any functions performed within the LFCPs. Therefore, any fault by this equipment will not impact the ability of the LFCPs to perform their intended functions.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-009  
Implementation Document No.: Procedure N1-EMP-GEN-296  
UFSAR Affected Pages: IX-2a  
System: 345-kV Distribution  
Title of Change: Establishment of and  
Restoration from 345-kV  
Backfeed through Station  
Transformers T1 or T2

**Description of Change:**

This change established a procedure for backfeeding 345 kV to the Station when in the cold shutdown or refueling condition.

After disconnecting the main generator links and closing in on the 345-kV breakers R915 or R925, and after taking the appropriate precautions, backfeed is accomplished by energizing main transformer T1 or T2 by way of 345-kV lines 8 or 9. This configuration will step down the system voltage from 345 kV to 24 kV and use station service transformer #10 to supply 4160 V to energize power boards #11 and #12.

**Safety Evaluation Summary:**

When Unit 1 is in the cold shutdown or refueling condition, the main turbine generator is out of service and station power is being supplied by the 115-kV reserve sources via transformers T101N and T101S. The establishment of 345-kV backfeed through transformer T1 or T2 increases the reliability of availability of offsite ac power to energize the 4160-V power boards 11 and 12. This configuration does not affect the station distribution system or nuclear safety. The 345-kV system will not be, at any time during this configuration, the only source of ac power available to supply the station. The 345-kV buses will not be paralleled to the 115-kV lines or the emergency diesel generators while the backfeed configuration is in place.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-010, Rev. 3  
Implementation Document No.: Simple Design Change  
SC1-0078-92  
UFSAR Affected Pages: VI-64, VI-68  
System: Reactor Protection (RPS)  
Title of Change: Removal of High Radiation  
Sensor Relay Timers (2-11/202  
and 2-12/202), Reactor  
Building Ventilation System

**Description of Change:**

This change removed time delay relays 2-11/202 and 2-12/202. These relays delayed closure of the reactor building normal exhaust line isolation valves and delayed tripping of the normal exhaust fans upon detection of high radiation levels within the reactor building. The purpose of the delay was to ensure that reactor building negative pressure was maintained during the transition from normal to emergency ventilation system operation. Analysis has shown that the time delay is not required to achieve that purpose.

**Safety Evaluation Summary:**

Analysis has demonstrated that the time delay relays are not required to maintain the reactor building pressure negative during the transition from normal to emergency ventilation system operation. In addition, removal of the timer reduces the likelihood of an overpressurization/underpressurization event. Maintaining the subject negative pressure will be accomplished by surveillance (N1-ST-Q20) of the ventilation system isolation valve closure times.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-011  
Implementation Document No.: N/A  
UFSAR Affected Pages: IX-4  
System: 115-kV Offsite Power Supply  
Title of Change: Bennetts Bridge Hydro -  
Removal from Service in 1992  
and 1993

**Description of Change:**

Bennetts Bridge Hydro Station Units 3 and 4 are being removed from service from June 1, 1992, to February 1, 1993, for rehabilitation and upgrading. With their removal from service, dedicated emergency backup power to the Unit 1 high pressure coolant injection (HPCI) system through the 115-kV transmission system will not be available.

Also, controllership of the hydroelectric operations at Bennetts Bridge has been transferred from the Central Regional Control Center in Syracuse to the Northern Regional Control Center in Watertown.

**Safety Evaluation Summary:**

Since HPCI backup power was not assured during 115-kV system blackout conditions, credit was not taken for its use in the loss-of-coolant accident (LOCA) analyses. Thus, the results of the current LOCA analysis remain unchanged. Removal of these units at Bennetts Bridge will not cause a violation of the Technical Specifications (Section 3.1.8, High Pressure Coolant Injection, and Section 3.6.3, Emergency Power Sources).

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-021  
Implementation Document No.: LDCN U-N0184  
UFSAR Affected Pages: XV-5  
System: Fuel, Turbine Bypass Portion  
of Main Steam  
Title of Change: Disposition of Turbine Bypass  
Capacity Shortfall, PR-2070

**Description of Change:**

Safety Evaluation No. 90-048 (previously reported in letter NMP1L 0589 dated June 28, 1991) addressed a shortfall of turbine bypass valves capacity that was measured during plant restart testing. This change adds a clarification to UFSAR Chapter XV, which notes that this shortfall in bypass capacity will not cause the transients defined in UFSAR Chapter XV, which use the bypass system, to exceed any safety limits. These transients are bounded by the reload analysis which does not take credit for the bypass system.

**Safety Evaluation Summary:**

This change updated the UFSAR to note the impact of the turbine bypass capacity shortfall on Chapter XV transients, as previously analyzed in Safety Evaluation No. 90-048. Since the limiting transients analyzed for the reload analysis do not take credit for the turbine bypass valves, the bypass capacity shortfall does not impact plant safety.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-025, Rev. 1

Implementation Document No.: Procedures N1-OP-5,  
N1-ISI-LK101

UFSAR Affected Pages: N/A

System: Control Rod Drive (CRD)

Title of Change: Manual Operation of CRD Flow  
Control Valve (FCV) When  
Temperatures are Equal to or  
Greater Than 212°F

**Description of Change:**

During reactor vessel hydrostatic testing, this change allows operation of the CRD system with the FCV set to manual at a flow rate of less than 50 gpm, with an operator dedicated (as required by procedure N1-ISI-LK101) to assume control should increased makeup be required. Also, during plant startup and operation, this change allows operation of the CRD system with the FCV set to manual at a flow rate of greater than or equal to 50 gpm, with an operator dedicated (as required by procedure N1-OP-05) to assume control to provide makeup as required. The change during plant startup and operation also allows placing the FCV in manual with a dedicated operator if reactor pressure results in erratic response while set in automatic. The dedicated operator insures that an adequate flow rate (greater than or equal to 50 gpm) is maintained. This change was necessary to maintain proper feed and bleed control during the reactor hydrostatic test, and to eliminate erratic CRD FCV response while under low reactor pressure conditions during startup.

**Safety Evaluation Summary:**

This change is acceptable since (1) the system continues to meet the Technical Specification surveillance requirements in that the pump meets its pump head curves and is capable of automatic initiation, (2) in the event of reactor coolant leakage and resulting pump discharge head decrease, pump flow will increase in accordance with the pump curve, and (3) the dedicated operator can assume manual control to compensate for any reactor coolant leakage.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-031

Implementation Document No.: N/A

UFSAR Affected Pages: I-5; V-3 (Table V-1), V-21, V-22, V-23 (Figure V-5), V-23a, V-24 (Figure V-6), V-25 (Figure V-7); XVI-1, XVI-51

System: N/A

Title of Change: Incorporation of the Method of Revision 2 to Regulatory Guide 1.99, Radiation Embrittlement of Reactor Vessel Materials into the Plant Licensing Basis

**Description of Change:**

New reactor vessel pressure-temperature (P-T) limits have been developed to reflect the impact of Regulatory Guide (RG) 1.99, Revision 2, to ensure Station operations are conducted with reactor pressure vessel (RPV) above nil ductility transition temperature (NDTT) to preclude brittle failure of RPV materials. Generic Letter (GL) 88-11 requested all nuclear plants to analyze the impact of RG 1.99, and that all actions necessary be completed within two plant outages of the effective date of the revision. NMPC performed the appropriate analyses and updated the P-T limits curves. This change also resolved a mixup in reactor vessel surveillance specimens. Several capsules have been reinserted in the reactor cavity, and the surveillance capsule withdrawal schedule has been revised. A license amendment request to incorporate these changes into the Technical Specifications was submitted to the NRC.

**Safety Evaluation Summary:**

The revised P-T operating limits are based on analysis using Revision 2 to RG 1.99, and thus satisfy GL 88-11. Implementation of the revised P-T operating limits ensures that Station operations are conducted with the reactor vessel materials above the NDTT. The revised P-T operating limits and surveillance program preclude brittle failure of the reactor vessel materials since safety margins specified in 10CFR50 Appendix G and the ASME Code Appendix G will be maintained. The revised P-T limits and surveillance program were approved by the NRC in their safety evaluation associated with the issuance of License Amendment No. 127.

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Safety Evaluation No.: 92-032, Rev. 0 & 1  
Implementation Document No.: Mod. N1-92-011  
UFSAR Affected Pages: N/A  
System: Emergency Condenser  
Title of Change: Cut Weld Joining Valve 39-04  
to Valve 39-02 and/or Cut Weld  
Joining Valve 39-03 to Valve  
39-01

**Description of Change:**

This evaluation reviewed and evaluated the safety implications and impacts of cutting out the circumferential butt weld joining check valve 39-04 to gate valve 39-02 (and/or the butt weld joining check valve 39-03 to gate valve 39-01) with (1) the reactor in the cold shutdown condition, (2) irradiated fuel contained in the reactor vessel, and (3) single reactor pressure boundary isolation via a safety-related manual gate valve.

This action was to facilitate shop repair of cracks in the check valve and eventual replacement of the gate valves.

**Safety Evaluation Summary:**

The emergency condenser system is not required to be operable when the plant is in the cold shutdown condition. The design of the manual gate valve is such that it can provide isolation of the reactor pressure boundary when performing maintenance on the upstream check valve. The valve, when closed, has demonstrated leak-tightness and will not degrade during the cutting operation. Existing cracks located in the gate valve body will not become larger as a result of the cutting operation. In the event that some minor leakage were to occur through the valve disc seat area, it would be well within the makeup capabilities of reactor water makeup systems and would not lead to core uncovering. Measures were taken to establish reactor conditions most favorable with respect to inventory, isolation, level indication, and decay heat removal, and to mitigate the consequences in the unlikely event that excessive leakage were to occur during the cutting operation.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-033  
Implementation Document No.: Fuel Handling Procedure  
N1-FHP-27, Rev. 9  
UFSAR Affected Pages: N/A  
System: Control Rod Drive  
Title of Change: Extended Core and Control Rod  
Drive Maintenance Tech. Spec.  
Basis Change for Spiral  
Offload

**Description of Change:**

This change to Technical Specification Bases Section 3.5.3 revised the sequence of bypassing the refueling interlock for control rods located in an offloaded fuel cell. The original bases required bypassing the refueling interlock prior to withdrawal of the control rod located within an offloaded fuel cell. The revised sequence installs the refueling interlock jumper after the control rod for the selected cell is fully withdrawn, thus maintaining the one-rod-out automatic protection until all rod movement is complete.

In addition, the original bases specified that independent verification of the refuel interlock bypass would be performed by a member of the reactor analysis staff. The revised bases now specify that an independent licensed operator or engineer will perform the independent verification.

**Safety Evaluation Summary:**

This Technical Specification basis change does not adversely affect nuclear safety, nor does it increase the potential for an inadvertent criticality excursion during refueling operations. General Electric recommended that refuel interlocks be maintained until after the control rod located within an offloaded fuel cell was fully withdrawn. The interlock for the withdraw control rod would then be bypassed and independently verified. Operation in this sequence provides automatic protection from multiple control rod withdrawal which could result in inadvertent criticality.

The bases change in the independent verification is due to the fact that the Reactor Analysis Department no longer exists because of an organizational change. This independent verification is consistent with that required by Technical Specification 4.1.1 b.(3)(b), "Control Rod System."

Safety Evaluation No.: 92-033 (cont'd.)

Safety Evaluation Summary: (cont'd.)

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-034  
Implementation Document No.: Procedure N1-OP-43  
UFSAR Affected Pages: N/A  
System: Average Power Range Monitoring (APRM) and Intermediate Range Monitoring (IRM) Nuclear Instrumentation Systems  
Title of Change: Coincident APRM Downscale and IRM Upscale Scram in RUN Design Basis

**Description of Change:**

This change to operating procedure N1-OP-43 allows the withdrawal of the IRM detectors to the storage position when the mode switch is in RUN, and the associated APRM is greater than the downscale trip setpoint as long as the associated IRM is maintained onscale. The procedure previously allowed the IRM to be maintained in an upscale trip to maintain the APRM downscale operable. This practice resulted in partial IRM insertion at power and premature IRM detector burnout.

**Safety Evaluation Summary:**

The design basis for the coincident IRM upscale and APRM downscale scram in the RUN mode is to assure proper overlap between the IRM and APRM systems. The Technical Specifications allow this scram to be bypassed in the RUN mode when the IRM and APRMs are onscale. Operating the IRMs such that the IRM is in the storage position in the RUN mode is consistent with the UFSAR description. Verifying the IRM is onscale (operable) and APRM operability, per Technical Specifications, is the only requirement to assure that the bypass conditions are applicable.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-036, Rev. 0 & 1  
Implementation Document No.: Mod. N1-92-011  
UFSAR Affected Pages: N/A  
System: Emergency Condenser  
(Condensate Return)  
Title of Change: Replacement/Repair of  
Emergency Condenser Valves

**Description of Change:**

This change consisted of replacement of cracked manual gate valves 39-01 and 39-02 with new valves, and weld repair of check valve 39-04. This also involved replacement of a straight spool of 10" pipe in each loop to accommodate valve fit up, and minor configuration changes to the drain pipes attached to the valves.

**Safety Evaluation Summary:**

This change restores the emergency condenser system to its design basis, and hence nuclear safety and plant operability are not affected. This modification meets all code and regulatory requirements for repair, replacement, test, and examination of the valves, piping, and welds. These repairs were performed with the reactor head removed and the reactor core offloaded. The recirculation loops #11 and #15 suction nozzles were plugged. Measures were taken to minimize the duration that the plugs were required, and to establish conditions most favorable with respect to reactor inventory, level indication, and makeup water availability.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-037  
Implementation Document No.: Major Order No. 1566  
UFSAR Affected Pages: IV-35, IV-35a  
System: Control Rod  
Title of Change: Control Blade Replacement

**Description of Change:**

This evaluation addresses the use of General Electric Duralife 230 (D-230) control rods. The D-230 is an improved design with an extended lifetime. Design features of the D-230 include: (1) the use of hafnium in place of boron carbide in the upper six inches of the control rod blade and in the outer edge of each wing; (2) use of high-purity stainless steel tube material; (3) a redesigned velocity limiter; (4) a new upper handle design; (5) incorporation of the BWR/6 control blade coupling release handle design; and (6) noncobalt pins and rollers.

The D-230 blade is very similar to the ALLCR addressed in Safety Evaluation No. 85-029, except that the D-230 blade has a larger volume of  $B_4C$  to increase control rod lifetime.

**Safety Evaluation Summary:**

The D-230 generic safety evaluation has been previously approved by the NRC. The new control rod reactivity worth is the same as the all- $B_4C$  control rods. The scram insertion times and control rod drop times are not significantly affected.

Based on the evaluation performed, it is concluded that these changes do not involve an unreviewed safety question.

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Safety Evaluation No.: 92-038, Rev. 2 & 3  
Implementation Document No.: Procedures NEP-POL-300,  
GAP-POL-01  
UFSAR Affected Pages: XII-30; Sections XIII.A,  
XIII.B, XIII.F, XIII.G;  
10A-10, 10A-12, 10A-13  
System: N/A  
Title of Change: Nine Mile Point Unit 1  
Reorganization

**Description of Change:**

Section XIII of the UFSAR describes the organization responsible for operation of Nine Mile Point Unit 1. This change addresses revisions to the Nuclear Division organizational structure. Departments and positions were redefined and reorganized to enhance the flow of communication and productivity of the Nuclear Division. Affected areas of the division organization include Generation and Quality Assurance.

**Safety Evaluation Summary:**

The organizational changes provide the Nuclear organization with resources to be both efficient and effective while meeting NRC guidance. The changes did not reduce the effectiveness of supervision or the ability of groups or individuals to perform activities necessary to ensure safe operation or shutdown of the plant. Positions specific to Unit 1 meet ANSI/N18.1-1971 requirements as endorsed by Regulatory Guide 1.8. Positions with site-related responsibilities meet both ANSI/ANS-3.1-1978 and ANSI/N18.1-1971 as endorsed by Regulatory Guide 1.8.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-039, Rev. 1  
Implementation Document No.: Procedure N1-STP-23  
UFSAR Affected Pages: N/A  
System: Core Spray, Containment Spray,  
Automatic Depressurization  
System (ADS)  
Title of Test: Testing of Initiation Logic  
for Core/Containment Spray and  
ADS Circuitry as Powered from  
EDG 102 and 103 for Degraded  
Voltage Conditions

**Description of Change:**

Special test procedure N1-STP-23 was performed to acquire data for existing circuit relays for characteristics of pickup and dropout voltages and frequency response. With the plant in cold shutdown conditions and with one channel of both core and containment spray operational, the initiation logic of the other channel was isolated from its normal power supplies, tested, and subsequently returned to service. Testing involved connection of these circuits to a source of variable voltage and frequency. Voltages were increased and decreased to derive the desired information for pickup and dropout of relay coils. The circuits were then tested at variable frequencies to determine circuit response with respect to time. This test was performed to satisfy a commitment to the NRC following the Electrical Distribution System Functional Inspection (Inspection Report No. 50-220/91-80).

**Safety Evaluation Summary:**

The testing was performed with the plant in cold shutdown. One channel of both the core spray and containment spray systems remained operable. The evaluation determined that the testing would not initiate or adversely affect other safety-related structures, systems or components since logic circuitry being tested was isolated. Appropriate precautions, limitations and test abort criteria were included in the procedure should unexpected conditions arise which could have the potential to put the plant in an unsafe condition. System operability tests were performed before the systems were returned to service. As an added precaution, spare timers and relays were made available (of the types being tested) as a prerequisite to testing.

Safety Evaluation No.: 92-039, Rev. 1 (cont'd.)

Safety Evaluation Summary: (cont'd.)

Based on the evaluation performed, it is concluded that this test does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-040  
Implementation Document No.: Procedures NIP-ECA-01,  
NIP-SRE-01  
UFSAR Affected Pages: Section XIII.G  
System: N/A  
Title of Change: Operations Experience  
Assessment

**Description of Change:**

This procedural change fulfills the operating experience assessment (OEA) function by utilizing an alternative approach to that presently described in the UFSAR. The assessment function is no longer fulfilled primarily by the OEA group. The procedural changes require that the OEA function be accomplished by a responsible organization which is considered most cognizant over the operating information being evaluated. This assessment function is controlled by a Nuclear Division Interfacing Procedure, NIP-ECA-01, entitled "Deviation Event Report." The DER process, in conjunction with Nuclear Division Interfacing Procedure NIP-SRE-01, entitled "Operating Experience Assessment," meets the requirements of TMI Issue I.C.5.

In addition, the procedural changes eliminate the need for mandatory Station Operations Review Committee (SORC) participation every two months with the OEA group. The alternative approach allows the Plant Manager to request SORC involvement in the processing of DERs related to the OEA function on an as-needed basis.

**Safety Evaluation Summary:**

The use of the DER process to fulfill the OEA function, as mandated by TMI Issue I.C.5, is acceptable based upon the following:

1. The DER process is proceduralized;
2. OEA for any given applicable DER is performed by the most qualified NMPC group, since the selection criteria of the responsible organization for processing the DER is procedurally required to be the most cognizant group for the subject matter of a given DER;

Safety Evaluation No.: 92-040 (cont'd.)

Safety Evaluation Summary: (cont'd.)

3. The DER disposition process provides a mechanism by which necessary plant actions, training, and retraining will be stipulated; and
4. SORC involvement, as mandated by either Plant Manager on an as-needed basis, ensures fulfillment of SORC's review function of advising the Plant Manager on matters related to nuclear safety.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-045  
Implementation Document No.: N/A  
UFSAR Affected Pages: N/A  
System: Radwaste  
Title of Change: Temporary Use of a CO<sub>2</sub> Pellet  
Decontamination Facility at  
NMP1

**Description of Change:**

This change involves the installation and use of a CO<sub>2</sub> pellet cleaning facility for decontamination of tools and other hardware during NMP1 outages. The pellet cleaning facility will be temporarily located on the west side of the Unit 1 turbine building, and consists of a 14-ton liquid CO<sub>2</sub> storage tank, compressed air delivery system, CO<sub>2</sub> pelletizer, delivery gun, cleaning enclosure, and support equipment enclosure. The system cleans radioactively-contaminated hardware of up to 4000 lbs. by means of high-velocity delivery of CO<sub>2</sub> pellets. The solid CO<sub>2</sub> expands to gas during the decontamination process and is removed along with the contaminants via the HVAC system. Air exhaust from the cleaning facility is directed into the turbine building.

**Safety Evaluation Summary:**

The CO<sub>2</sub> pellet cleaning facility is expected to reduce both the time and exposure to workers in the handling of radioactive materials. The controls and operation of the facility do not create a new radioactive effluent pathway or create an unmonitored release of radioactivity. The decontamination enclosures are designed to ensure that a negative pressure is maintained in both the walk-in and glove box enclosures. A HEPA filter system is used to ensure that both workers and the environment are not subjected to unfiltered exfiltration from the facility. Control room habitability would not be affected by rupture of the CO<sub>2</sub> storage tank or loss of containment of the facility. The facility itself will not create any building wake effects that would affect atmospheric dispersion values used for accident analyses.

Based on the evaluation performed, it is concluded that this temporary change does not involve an unreviewed safety question.

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**Safety Evaluation No.:** 92-046, Rev. 0 & 1  
**Implementation Document No.:** N/A  
**UFSAR Affected Pages:** III-3 (Figure III-1)  
**System:** N/A  
**Title of Change:** Nine Mile Point Compressed  
Bottled Gas Storage Facility

**Description of Change:**

This change consists of the construction of a new bottled gas storage facility. The new storage facility is a nonsafety-related structure and is located outside the protected area south of the Unit 2 Warehouse. The area of the new facility is about 2500 sq. ft. with interior ceiling height about 15 ft., and is designed to accommodate 550 bottles of various compressed gases. The facility consists of two areas; the east area is designated for storage of the flammable bottles, and the west area is designed for storage of the nonflammable bottles.

**Safety Evaluation Summary:**

The construction of the new storage facility does not disturb those attributes of the site, in the immediate vicinity of the plant, which safely divert the local probable maximum precipitation runoff overland to Lake Ontario. Also, since the new facility is low in elevation and outside the protected area, this location will not create any wind disturbances which may affect the atmospheric dispersion factor study.

The effects of an accidental nitrogen gas release from the facility on control room habitability were evaluated. The potential for missiles as a result of fire or explosion was also considered. No adverse impacts were identified.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-050, Rev. 0 & 1  
Implementation Document No.: N/A  
UFSAR Affected Pages: N/A  
System: Main Steam; Reactor Instr;  
Turbine Protect/Supervisory  
Title of Change: Refuel Cycle Surveillance  
Frequency Extension Evaluation

**Description of Change:**

Certain NMP1 Technical Specification surveillances which are required to be performed on a "refuel cycle" timetable nominally became due in January 1993. The due dates of these surveillances were extended to allow plant operation during a period of low operating reserve based on New York Power Pool (NYPP) projections. This safety evaluation reviewed the affected surveillances and provided a basis for justifying extensions to Technical Specification specified surveillance periods. The current refuel outage latest start date was February 19, 1993, for the purposes of this evaluation. Therefore, the extension covered a period from January 1993 until after February 19, 1993, during the planned refuel outage.

**Safety Evaluation Summary:**

A review of historical equipment "as-found, as-left" historical data and associated statistical analysis confirms that the effects on setpoint drift due to the surveillance frequency extension would be insignificant. Also, none of the ASME Section XI test frequencies will be exceeded without NRC approval. A relief request was submitted to the NRC to delay certain surveillances specified in the IST program (reference NMPC letter NMP1L 0705 dated August 15, 1992). Therefore, the delay in the start of Unit 1 refuel surveillances until after February 19, 1993, will not cause plant operation outside of analyzed limits or accident conditions or cause the reduction of any margin of safety.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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**Safety Evaluation No.:** 92-052  
**Implementation Document No.:** Temporary Mod. 92-044  
**UFSAR Affected Pages:** N/A  
**System:** N/A  
**Title of Change:** Reroute the Security Fence to Support the Demolition of "Area Complex" Building and the Construction of the Swing Building

**Description of Change:**

This change constructed a temporary "bubble fence" and rerouted the security fence to exclude the Area Complex site from the protected area of Nine Mile Point so activities associated with the construction of the swing building would be outside the security zone.

The temporary "bubble fence" was constructed following security procedures and regulations. The fence was equipped with a security intrusion detection system, and a closed-circuit TV camera (CCTV) was installed in accordance with 10CFR73.

**Safety Evaluation Summary:**

This temporary modification does not result in a significant elevation change in the flooding levels within the berm area of Nine Mile Point Site. Rerouting the security fence and construction of the "bubble fence" do not disturb those attributes of the site in the immediate vicinity of plant which safely divert the local probable maximum precipitation (PMP) runoff overland to Lake Ontario.

Based on the evaluation performed, it is concluded that this temporary change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-053, Rev. 0 & 1  
Implementation Document No.: Simple Design Change  
SC1-0092-92  
UFSAR Affected Pages: VI-22  
System: Torus  
Title of Change: Torus Corrosion Coupons

**Description of Change:**

This change installed corrosion coupons in the torus to provide another method of determining torus shell corrosion rates in addition to the current UT methods. The coupon holder supports were attached to existing gussets on the ring girders, and were fabricated from lexan, to prevent or minimize galvanic corrosion.

**Safety Evaluation Summary:**

The NRC directed NMPC to install corrosion coupons in the torus during the 1993 refuel outage in their August 25, 1992, Safety Evaluation Report. Although the coupons do not perform any safety function, the holders and supports are designed to withstand LOCA loads. Even if the coupons were dislodged during a LOCA, there would be no detrimental effect due to impact on the torus shell, and no detrimental effect to core and containment spray systems since the loose coupons would not have the capability, under LOCA conditions, to enter the horizontal suction of those systems.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-054  
Implementation Document No.: Procedures N1-CSP-8M, S-SP-5  
UFSAR Affected Pages: IX-24  
System: Emergency Diesel Generator  
Fuel Oil Handling and Storage  
Title of Change: Emergency Diesel Generator  
Fuel Oil Sampling

**Description of Change:**

The First Supplement to the UFSAR (May 1968), in describing the emergency diesel generator (EDG) fuel oil storage and delivery system (page V-12), states that "Sample taps will be provided between the tanks and filters," and also that samples will be taken at 6-month intervals initially, then annually thereafter. The current monitoring of EDG fuel oil quality is performed monthly. Samples are taken from the storage tank with a sample thief, accessed through the storage tank fill port, obtaining a sample at a depth of 6 in. from the tank bottom.

This evaluation addresses the equivalency for the sampling method currently utilized.

**Safety Evaluation Summary:**

Although provisions for sampling taps were provided for on the delivery system, alternate methods are used to monitor the fuel oil quality. The sampling procedure used ASTM D-270, as referenced by Regulatory Guide 1.137, as a basis for the procedure method. The most current sampling method is ASTM D-4057-88 (superseding ASTM D-270). It contains the guidance necessary to obtain the ASTM "outlet sample" from the storage tank at the same level as the suction line of the transfer pump. This sample is equivalent to a transfer line sample used to monitor the EDG fuel oil quality.

Failures of the sample thief chains that result in the sampler either remaining in the storage tank fill tube or falling to the bottom of the storage tank have been evaluated and will not prevent the EDGs from performing their function.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-056  
Implementation Document No.: N/A  
UFSAR Affected Pages: N/A  
System: N/A  
Title of Change: Storage of GE11 Fuel in the  
South Half of the Fuel Pool

**Description of Change:**

This safety evaluation addressed the insertion and storage of 172 new GE11 fuel assemblies into the boraflex poison racks in the south half of the NMP1 spent fuel pool. These assemblies were loaded in the core for Reload 12. The new fuel was inserted in the south half of the spent fuel pool prior to the reload. The core was completely offloaded for the refueling as well as other maintenance activities. The south half of the spent fuel pool had sufficient open spots to accommodate the new fuel as well as the offloaded core. Thus, the racks had a mixed array of exposed bundles and new GE11 fuel.

**Safety Evaluation Summary:**

The GE11 fuel is designed to be handled and stored in the same manner as the current fuel assemblies. The GE11 reload fuel axial enrichment is less than the design value for the racks, and the weight of the GE11 assembly is slightly less than the current fuel assembly designs. A criticality analysis of the spent fuel pool verifies that the infinite neutron multiplication factor ( $K_{\infty}$ ) meets the acceptable rack reactivity limits. Due to the dynamic similarity of the GE11 fuel design to previous fuel designs, no significant differences in seismic response are predicted, and the seismic loads are considered to be within the design values for the racks.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-057  
Implementation Document No.: Simple Design Change  
SC1-209-91  
UFSAR Affected Pages: N/A  
System: Containment Spray/Containment  
Spray Raw Water  
Title of Change: Provide Venting Capability to  
the Containment Spray Heat  
Exchangers

**Description of Change:**

This change provides venting to the shell and tube sides of the containment spray heat exchangers by opening the vent line manually-closed blocking valves and leaving them permanently open except during surveillances and maintenance. Upon system initiation, the exchangers are filled along with the balance of the system piping. Without the vent lines open, the potential exists for noncondensable gases (air) to become trapped within the exchangers, effectively reducing the heat exchange surface area and adversely affecting system performance.

**Safety Evaluation Summary:**

Each containment spray heat exchanger has two vent lines on the tube side and two vent lines on the shell side. On each side, the two vents combine upstream of a Y-type strainer and a flow limiting orifice. The tube side vents are routed to the floor drain system; the shell side vents are routed to the torus. Leaving the vent lines normally open reinstates the original design configuration (i.e., prior to replacement of heat exchangers in 1986). Potential impacts evaluated included additional flow to the floor drain system, isolation of the common vent line to the torus, and interconnection of heat exchangers via the common shell side vent line. No adverse impacts on plant safety were identified.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-059, Rev. 1  
Implementation Document No.: Mod. N1-86-026  
UFSAR Affected Pages: III-46 (Figure III-18)  
System: TSC Emergency Ventilation  
(System #212)  
Title of Change: Addition to TSC Ventilation  
Control Panel

**Description of Change:**

This modification installed indication lights for Technical Support Center (TSC) emergency ventilation fan FN-1 and dampers 212-42, 212-31 and 212-87, located in the charcoal filter room, as well as indication lights for normal/emergency power source. A digital timer was also wired to key switch KS-2. The timer runs only when the TSC ventilation system is in the emergency mode of operation. All indication is provided on the TSC ventilation control panel ATPC-1, located in the TSC.

**Safety Evaluation Summary:**

This modification provides indication at the TSC ventilation control panel to monitor status of ventilation equipment related to the TSC, without requiring occupants to exit the TSC. Allowing personnel to remain in the TSC during emergency conditions decreases the possibility of personnel contamination and loss of valuable TSC personnel time.

The new equipment/material introduced by this modification only affects the TSC emergency ventilation system. It is isolated from other areas of NMP1 and NMP2 which could affect the safe shutdown of either plant.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 92-060  
Implementation Document No.: LDCR 1-92-UFS-008  
UFSAR Affected Pages: V-11 (Figure V-1); VI-44  
(Table VI-1), VI-45 (Table  
VI-1), VI-46 (Table VI-2),  
VI-56, VI-58 (Figure VI-22);  
VII-47 (Figure VII-12); X-9  
(Figure X-3)  
System: Various  
Title of Change: Miscellaneous UFSAR  
Discrepancies

**Description of Change:**

A review of the UFSAR against current controlled design basis documents uncovered multiple discrepancies, primarily due to a failure to properly update the UFSAR as design changes were made. In all cases analyzed in this safety evaluation, the UFSAR was incorrect and required revision. The reason for this safety evaluation was to assure that none of the proposed changes constitute an unreviewed safety question.

**Safety Evaluation Summary:**

Most of the identified UFSAR changes are due to design changes and have been previously evaluated in 10CFR50.59 safety evaluations. Other changes are due to inconsistencies within the UFSAR itself, e.g., one table includes a valve while the corresponding figure omits it. Several of the changes addressed are simply editorial in nature and have no technical significance. One change addressed the piping configuration for the recirculation pump coolers, which was inaccurately represented on UFSAR Figure VI-22 (page VI-58). This UFSAR correction is made to accurately depict the as-built plant configuration, and has no impact on the functioning of the coolers, the reactor building closed loop cooling system, or the containment isolation valves for the subject penetration.

Based on the evaluation performed, it is concluded that these UFSAR changes do not involve an unreviewed safety question.

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Safety Evaluation No.: 92-070  
Implementation Document No.: N/A  
UFSAR Affected Pages: X-62, 10A-13  
System: N/A  
Title of Change: Reduction Fire Brigade  
Staffing through Partial  
Combination of the Unit Fire  
Brigades

**Description of Change:**

This change reduces the Unit Fire Brigade staffing to a minimum of a Fire Chief and two Fire Fighters. This results in a minimum site response organization of five Brigade members.

**Safety Evaluation Summary:**

Establishing a Unit staff size of a Fire Chief and two Fire Fighters achieves the requirements of 10CFR50 Appendix R and BTP CMEB 9.5-1, which requires that at least five Brigade members respond to a fire. Of these five responders, the Fire Chief and two members must be familiar with the effects of fire and fire suppression activities on plant systems. The reduction in Unit-dedicated Fire Brigade staffing levels will not result in a lesser response to a fire (either in number of personnel fighting the fire or in a significant increase in their response time) or in a loss of fire watch or surveillance/maintenance activities.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question and does not decrease the effectiveness of the fire protection program.

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Safety Evaluation No.: 93-003, Rev. 0 & 1  
Implementation Document No.: Temporary Mod. 93-0004  
UFSAR Affected Pages: N/A  
System: Control Rod Drive  
Title of Change: Operation with Partially Open  
301-133 Valve and Test  
Equipment Installed

**Description of Change:**

During the performance of a surveillance procedure for CRD/HCU 10-31, the withdraw high point vent (301-133) valve would not fully isolate, which prevented disconnecting the test equipment because of the resultant coolant leakage. The test equipment was left installed until the valve could be repaired and/or the line depressurized and the cap replaced.

**Safety Evaluation Summary:**

Operation with the high point vent valve not fully closed and the test equipment installed is acceptable. A failure of the test equipment is unlikely since the test equipment pressure and temperature ratings exceed those of the CRD system. If a failure did occur, the resulting inventory loss is well within the makeup capability of the CRD system. Analyses contained in NUREG-0803, which show the offsite doses would be below 10CFR100 limits and that the Reactor Building would be accessible for coolant activity values at the Standard Technical Specification limit, are bounding. Rod 10-31 is operable and can be fully withdrawn. Worst-case analysis indicates sufficient shutdown margin exists even if the rod gets stuck in the full out position.

Based on the evaluation performed, it is concluded that this temporary change does not involve an unreviewed safety question.

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Safety Evaluation No.: 93-009  
Implementation Document No.: Procedures GAP-POL-01 Rev. 01,  
and NEP-POL-300 Rev. 01  
UFSAR Affected Pages: Section XIII.A  
System: N/A  
Title of Change: Restructuring of Nuclear  
Support Organization Functions  
in Accordance with Revised  
Procedures GAP-POL-01 and  
NEP-POL-300

**Description of Change:**

Changes have been made to the corporate level management and technical support structure of NMPC's Nuclear Division including: Reorganizing the Licensing and Information Management Branches of the Nuclear Support Organization back under the Nuclear Engineering Organization; reorganizing the Training and Emergency Preparedness Branches of the Nuclear Support Organization back under the Nuclear Generation Organization; reorganizing the Procurement Branch of Nuclear Support under the Nuclear Generation Organization; dissolving the Nuclear Support Organization and eliminating the position of Vice President Nuclear Support.

**Safety Evaluation Summary:**

The new organizational structure provides for the integrated management of activities that support the operation and maintenance of Nine Mile Point Unit 1 and Unit 2. The Vice President Nuclear Generation will have overall responsibility for the support functions of Training, Emergency Preparedness, and Procurement, in addition to his present responsibilities. The Vice President Nuclear Engineering will have overall responsibility for the support functions of Licensing and Information Management, in addition to his present responsibilities. These changes provide clear corporate management control/direction of onsite and offsite support functions. These changes allow for dissolving the Nuclear Support Organization and eliminating the position of Vice President Nuclear Support. Based on the analysis performed, the new organizational structure for the support functions of Licensing, Information Management, Training, Emergency Preparedness, and Procurement does not constitute an unreviewed safety question.

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Safety Evaluation No.: 93-010  
Implementation Document No.: Procedure N1-FHP-8A  
UFSAR Affected Pages: X-57, X-58  
System: Spent Fuel Pool  
Title of Change: Fuel Preparation Machine Fuel  
Submergence

**Description of Change:**

This change modifies the minimum water depth over handled fuel from 8 ft. to 7 ft.-3 in. The change is in response to a discrepancy noted during revision to procedure N1-FHP-8A. Further, clarification is added to indicate that the depth refers to the depth of water over active fuel.

**Safety Evaluation Summary:**

This modification changes the depth of water over fuel handled in the pool. No changes to the depth or level of the pool, fuel handling procedures or methods, or existing accidents or analyses are proposed. This change will have no impact on the safe operation or shutdown of the plant, nor will it affect the consequences or probability of any accidents or malfunctions of equipment. The only identified change will be an increase in the calculated refuel floor dose rates due to the 9-in. decrease in water depth over the fuel bundle being handled. However, the fuel preparation machine has been in operation previously in this configuration, and measured dose rates during fuel movements have been significantly lower than calculated values.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 93-016  
Implementation Document No.: Procedure NIP-TQS-01  
UFSAR Affected Pages: Section XIII.B  
System: N/A  
Title of Change: Changes to NIP-TQS-01 to Describe Nine Mile Point Unit 1 and Nine Mile Point Unit II Staff Positions Comparable to ANSI N18.1-1971 and ANSI/ANS-3.1-1978

**Description of Change:**

This change to procedure NIP-TQS-01 added a list that cross-references titles used for staff members at Unit 1 to comparable positions as they appear in ANSI N18.1-1971.

**Safety Evaluation Summary:**

This change more clearly delineates staff positions as they are titled by NMPC and their qualifications as required by ANSI N18.1-1971. The NMPC staff member titles are in some cases different than those listed in ANSI N18.1-1971, but the functional responsibilities are the same as are the qualifications of the staff members holding those positions. The organization provides clear lines of authority to the Plant Manager and clear management control.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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Safety Evaluation No.: 93-031, Rev. 0

Implementation Document No.: Procedures NEP-POL-300,  
NIP-IRG-01 and NIP-ECA-04

UFSAR Affected Pages: Section XIII.A

System: N/A

Title of Change: Nuclear Licensing  
Organizational Structure and  
Responsibilities - Revised  
Procedures NEP-POL-300,  
NIP-IRG-01 and NIP-ECA-04

**Description of Change:**

The organizational structure of the Nuclear Licensing Organization has changed such that the Manager Licensing reports directly to the Executive Vice President Nuclear. Prior to this change, the Manager Licensing reported directly to the Vice President Nuclear Engineering.

In addition, the Manager Licensing has assumed the responsibilities for interfacing with INPO, and implementing the Quality First Program. These responsibilities were transferred from the Manager Executive Staff. The Manager Executive Staff position has been eliminated.

**Safety Evaluation Summary:**

The changes made to the organizational structure of the Nuclear Engineering and Nuclear Licensing Organizations continue to provide for the integrated management of activities that support the operation and maintenance of Nine Mile Point Unit 1 and Unit 2. These changes also continue to provide clear management control and effective lines of authority and communications between the organizational units involved in the management, operation, and technical support of the operation of Nine Mile Point Unit 1 and Unit 2.

Based on this evaluation, the organizational structure of the Nuclear Engineering and Nuclear Licensing Organizations continues to satisfy the acceptance criteria of SRP 13.1.1, and does not constitute an unreviewed safety question.

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Safety Evaluation No.: 93-034  
Implementation Document No.: Procedures GAP-POL-01,  
NEP-POL-300  
UFSAR Affected Pages: Section XIII.A  
System: N/A  
Title of Change: Restructuring of Nuclear  
Generation and Nuclear  
Engineering Organizations per  
Revised Procedures GAP-POL-01  
and NEP-POL-300

**Description of Change:**

This change revised the Nuclear Generation organization by expanding the existing Site Services organization to include Nuclear Security, Technical Services (including Fire Protection, Central Maintenance, Environmental Protection, and Procedures), Procurement, and Construction Services. The Site Services organization is now titled Site Support and is under the direction of the General Manager Site Support.

The Nuclear Engineering organization was revised to remove the Construction Services functions from the responsibilities of Manager Engineering (Units 1 and 2) and remove the functional area of Procedure Processing and Publishing.

**Safety Evaluation Summary:**

The revised organizational structure provides for the integrated management of common activities to support the operation and maintenance of Nine Mile Point Unit 1 and Unit 2. This organizational change alters the reporting structure of existing positions but does not affect the performance of functions or responsibilities. The new reporting structure provides clear management control and effective lines of authority and communications between the organizational units involved in the management, operation, and technical support for the operation of the facility. This change meets the acceptance criteria described in Branch Technical Position CMEB 9.5.1, Standard Review Plan Chapter 13.1, and Technical Specification 6.2.1.

Based on the evaluation performed, it is concluded that this change does not involve an unreviewed safety question.

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UFSAR TEXT, TABLE AND FIGURE CHANGES  
(BASED ON PREVIOUSLY REPORTED SAFETY EVALUATIONS)

A number of text and figure revisions were made to the UFSAR to include additional changes that are based on previously reported safety evaluations. These changes are identified below.

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**Safety Evaluation No.:** 85-035

**Previously Reported:** NMPC Letter to NRC dated November 15, 1985

Containment spray isolation valve IV 80-35 was initially locked open as a result of the requirements of 10CFR50 Appendix R (reference NMPC letter to the NRC dated September 12, 1983). However, as described in NMPC letter to the NRC dated November 15, 1985, modifications performed during the 1984 refueling outage eliminated this requirement, and motive power has been returned to valve IV 80-35. UFSAR Appendix 10B, Table 1 (page 10B-38) has been updated to reflect this restoration of motive power to IV 80-35, as described in Safety Evaluation 85-035.

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**Safety Evaluation No.:** 89-013, Rev. 5

**Previously Reported:** 6/28/91 (as Rev. 3,4)

UFSAR Figure VII-3 (page VII-12) has been revised to depict the containment spray system blocking valves 80-40 and 80-45 as normally open, with their operators removed, as described in Safety Evaluation 89-013. This change was previously incorporated into the text of UFSAR Section VII-B.2.0, but the figure revision was inadvertently overlooked.

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**Safety Evaluation No.:** 89-050, Rev. 2

**Previously Reported:** 6/29/92

Figure III-14 (page III-26) has been revised to show the revised control room emergency ventilation fan design flow rate of 2875 cfm ( $\pm 10\%$ ), as described in Safety Evaluation 89-050, Rev. 2.

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UFSAR TEXT, TABLE AND FIGURE CHANGES  
(BASED ON PREVIOUSLY REPORTED SAFETY EVALUATIONS)  
(Cont'd.)

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Safety Evaluation No.: 90-057, Rev. 1  
Previously Reported: 6/28/91

Safety Evaluation 90-057 Rev. 1 described upgrading of various plant barriers to fire rated as an enhancement to the Fire Protection Program. The Fire Hazards Analysis drawing B-40146-C was further revised to indicate that the one-hour rating of the slab at elevation 298'-0" in the reactor building is excluded above the instrument room at elevation 281'-0".

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Safety Evaluation No.: 91-028  
Previously Reported: 6/29/92

UFSAR pages VII-15 and XVI-113 have been revised to be consistent with the design basis reconstitution suppression chamber heatup analysis regarding containment spray system capability, as described in Safety Evaluation 91-028.

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ENCLOSURE B

TO NMP1L 0768

IDENTIFICATION OF CHANGES, REASONS AND BASES  
FOR NMPC-QATR-1  
(UFSAR APPENDIX B)

ENCLOSURE C

TO NMP1L 0768

INCORPORATION OF THE FPQAP  
INTO THE NMPC-QATR-1  
(UFSAR APPENDIX B)

ENCLOSURE B  
TO NMP1L 0768

**IDENTIFICATION OF CHANGES, REASONS AND BASES  
FOR NMPC-QATR-1  
(UFSAR APPENDIX B)**

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page ALL Section ALL	Page ALL Section ALL	<p>a. Revised section and page numbering consistent with conversion of the QATR into UFSAR Appendix B. Section cross-references were revised accordingly.</p> <p>b. Defined and consistently applied acronyms for commonly used terms throughout the document; e.g., Quality Assurance Topical Report (QATR), Quality Assurance (QA), Niagara Mohawk Power Corporation (NMPC), etc.</p> <p>c. Corrected typographical errors and modified punctuation and grammar.</p> <p>d. Revised department title from "Quality Assurance" to "Nuclear Quality Assurance". The title of "Vice President Quality Assurance" became "Vice President Nuclear Quality Assurance".</p>	<p>a. Editorial.</p> <p>b. Editorial.</p> <p>c. Editorial.</p> <p>d. To be consistent with the current organization title.</p>	<p>a. N/A</p> <p>b. N/A</p> <p>c. N/A</p> <p>d. The organization title change does not alter the functions or responsibilities of the QA (now NQA) department.</p>
Page B-i Table of Contents	N/A Table of Contents	Revised Table of Contents to reflect new Appendix B format.	Editorial.	N/A
Page B-ii List of Tables	N/A N/A	Added List of Tables consistent with FSAR format.	Editorial.	N/A
Page B.0-1 Introduction	Page i Introduction	<p>Section B.0 changes:</p> <p>a. Removed reference to NMPC's Quality Assurance Policy. Added reference to NMPC's Nuclear Division Policy and Directives Manual in third paragraph.</p> <p>b. Added Fire Protection Program QA requirements by reference to Branch Technical Position (BTP) APCSB 9.5-1, Appendix A.</p>	<p>Section B.0 reason:</p> <p>a. To more accurately describe the location of NMPC's policy regarding Quality Assurance matters.</p> <p>b. To incorporate fire protection QA requirements into the overall QA Program description.</p>	<p>Section B.0 basis:</p> <p>a. NMPC's policy regarding Quality Assurance matters has not changed. It continues to be embodied in the Nuclear Division Policy and Directives Manual.</p> <p>b. The commitment to BTP APCSB 9.5-1, Appendix A, was previously contained in the separate Fire Protection Quality Assurance Program (FPQAP), Introduction and Scope section. This administrative change does not alter the commitment to the BTP.</p>

<p>NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION</p>	<p>PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION</p>	<p>IDENTIFICATION OF CHANGE</p>	<p>REASON FOR CHANGE</p>	<p>BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC</p>
<p>N/A N/A</p>	<p>Page ii QA Policy</p>	<p>Removed QA Policy from the QATR.</p>	<p>To eliminate a policy statement that was redundant to that contained within the Nuclear Division Policy and Directives Manual.</p>	<p>NMPC's policy regarding Quality Assurance matters has not changed. It continues to be embodied in the Nuclear Division Policy and Directives Manual.</p>

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.1-1 Section B.1.1	Page 1-1 Section 1.1	<p>Section B.1.1 changes:</p> <ul style="list-style-type: none"> <li>a. Changed "such as" to "e.g.,".</li> <li>b. In second paragraph, inserted "and fire protection" following "safety-related".</li> <li>c. Replaced the "Nuclear Support" organizational unit with "Nuclear Licensing".</li> <li>d. Deleted "Nuclear Controller" from the statement regarding quality of work.</li> </ul>	<p>Section B.1.1 reason:</p> <ul style="list-style-type: none"> <li>a. Editorial.</li> <li>b. To incorporate fire protection QA requirements into the overall QA Program description.</li> <li>c. To reflect the current organization structure. The Nuclear Support unit, which included Licensing, has been dissolved. The Nuclear Licensing unit now reports directly to the Executive Vice President Nuclear.</li> <li>d. The Nuclear Controller does not perform any activities to which the QA Program applies.</li> </ul>	<p>Section B.1.1 basis:</p> <ul style="list-style-type: none"> <li>a. N/A</li> <li>b. Fire Protection QA requirements were previously contained in the separate FPQAP. This administrative change does not alter any commitments regarding Fire Protection QA.</li> <li>c. The functions and responsibilities of the Nuclear Licensing unit remain unchanged. The functions and responsibilities of other units within Nuclear Support were transferred to Nuclear Generation or Nuclear Engineering.</li> <li>d. This text change is consistent with the QA Program Responsibility Matrix (UFSAR Appendix B, Table B-1).</li> </ul>
B.1.2.1	1.2.1	<p>Section B.1.2.1 changes:</p> <ul style="list-style-type: none"> <li>a. Added "Upper Management Nuclear" between "NMPC" and "organization".</li> <li>b. Changed figure reference from "Figure 1-1" (of the QATR) to "Unit 1 UFSAR Figure XIII-1 and Unit 2 USAR Figure 13.1-1a".</li> <li>c. Added "for QA Program Elements" following "Departmental responsibilities".</li> <li>d. Revised reference from "Figure 1-2" to "Table B-1".</li> </ul>	<p>Section B.1.2.1 reason:</p> <ul style="list-style-type: none"> <li>a. Editorial, to more clearly describe the organization depicted on the referenced figures.</li> <li>b. Editorial. The NMPC organization is already described in other sections of the Unit Safety Analysis Reports.</li> <li>c. Editorial clarification.</li> <li>d. Editorial. The referenced material continues to be the QA Program Responsibility Matrix (Table B-1).</li> </ul>	<p>Section B.1.2.1 basis:</p> <ul style="list-style-type: none"> <li>a. N/A</li> <li>b. N/A</li> <li>c. N/A</li> <li>d. N/A</li> </ul>

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.1-2 Section B.1.2.1.1	Page 1-2 Section 1.2.2.1, 1.2.2.1.A, 1.2.2.1.A.1	<p>Section B.1.2.1.1 changes:</p> <p>a. Eliminated the "Manager Executive Staff" position.</p> <p>b. Added a paragraph that references Unit 1 UFSAR Section XIII.A and Unit 2 USAR Section 13.1.1 for descriptions of responsibilities for the Manager Licensing, Director Nuclear Communications and Public Affairs, and Controller Nuclear Division. The new paragraph also references Unit 1 UFSAR Appendix 10A and Unit 2 USAR Appendix 9A for descriptions of organizational responsibilities regarding the Fire Protection Program.</p> <p>c. Added reference to Table B-1 for QA Program responsibilities of the Nuclear Generation organization unit.</p> <p>d. Deleted description of Plant Managers, Unit 1 and Unit 2, responsibilities, and added a paragraph referencing Unit 1 UFSAR Section XIII.A and Unit 2 USAR Section 13.1.2.</p>	<p>Section B.1.2.1.1 reason:</p> <p>a. To reflect the current organization.</p> <p>b. To avoid duplication between UFSAR Appendix B and other sections of the Unit Safety Analysis Reports.</p> <p>c. Editorial clarification.</p> <p>d. To avoid duplication between UFSAR Appendix B and other sections of the Unit Safety Analysis Reports.</p>	<p>Section B.1.2.1.1 basis:</p> <p>a. Responsibility for the Quality First Program (Q1P) has been transferred to Nuclear Licensing. Otherwise, as shown on the QA Program Responsibility Matrix (Table B-1), the Manager Executive Staff had neither primary nor support responsibilities for QA Program elements.</p> <p>b. This is an editorial change only. Responsibilities and duties of key nuclear division personnel are already described in the Unit Safety Analysis Reports, and QA Program responsibilities continue to be depicted on the QA Program Responsibility Matrix (Table B-1).</p> <p>c. N/A</p> <p>d. This is an editorial change only. Responsibilities and duties of Plant Managers are already described in the Unit Safety Analysis Reports, and QA Program responsibilities continue to be depicted on the QA Program Responsibility Matrix (Table B-1).</p>



NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
<p>Page B.1-3 Section B.1.2.1.1 (continued)</p>	<p>Page 1-3 Section 1.2.2.1.A.2 1.2.2.1.A.3 1.2.2.1.B 1.2.2.1.B.1 1.2.2.1.B.2 1.2.2.1.B.3</p>	<p>Section B.1.2.1.1 changes (continued):</p> <p>a. Removed description of responsibilities for the Manager Site Services and the Manager Nuclear Security. Note that the Manager Site Services position has been eliminated, and the General Manager Site Support position has been created. Also, the Training, Procurement, and Emergency Preparedness functions have been added to the Nuclear Generation branch (previously part of Nuclear Support).</p> <p>b. Removed descriptions of responsibilities for the Manager Units 1 and 2 Engineering, Manager Technology Services, and General Supervisor Engineering Performance Services. Note that the Manager Information Management position has been added to the Nuclear Engineering branch (previously part of Nuclear Support). A paragraph was added to reference Unit 1 UFSAR Section XIII.A and Unit 2 USAR Section 13.1.1 for descriptions of the Nuclear Engineering organization.</p> <p>c. Revised reference for "Figure 1-2" to "Table B-1."</p>	<p>Section B.1.2.1.1 reason:</p> <p>a. To avoid duplication between UFSAR Appendix B and other sections of the Unit Safety Analysis Reports, and to reflect the current organization.</p> <p>b. To avoid duplication between UFSAR Appendix B and other sections of the unit safety analysis reports, and to reflect the current organization.</p> <p>c. Editorial. The referenced item continues to be the QA Program Responsibility Matrix (Table B-1).</p>	<p>Section B.1.2.1.1 basis:</p> <p>a. Responsibilities and duties of Nuclear Generation Branch Managers are already described in the Unit Safety Analysis Reports (see also the change description for previous QATR Page 1-2). Overall functions performed by the Nuclear Generation branch have not been reduced. QA Program responsibilities of the Nuclear Generation branch continue to be depicted on the QA Program Responsibility Matrix (Table B-1).</p> <p>b. Responsibilities and duties of Nuclear Engineering branch managers/supervisors are already described in the Unit Safety Analysis Reports. Overall functions performed by Nuclear Engineering have not been reduced. QA Program responsibilities of the Nuclear Engineering branch continue to be depicted on the QA Program Responsibility Matrix (Table B-1).</p> <p>c. N/A</p>

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
<p>Page B.1-3 Section B.1.2.1.1 (continued)</p>	<p>Page 1-4 Section 1.2.2.1.P.4 1.2.2.1.C 1.2.2.1.C.1 1.2.2.1.C.2 1.2.2.1.C.3 1.2.2.1.C.4 1.2.2.1.C.5</p>	<p>Section B.1.2.1.1 changes (continued):</p> <ul style="list-style-type: none"> <li>a. Removed description of responsibilities for the Manager ISEG.</li> <li>b. Removed description of the Nuclear Support organization, which has been eliminated. The Manager Licensing and Director Human Resource Development now report directly to the Executive Vice President Nuclear. The Training and Emergency Preparedness functions were transferred to Nuclear Generation, and the Information Management function was transferred to Nuclear Engineering.</li> </ul>	<p>Section B.1.2.1.1 reason:</p> <ul style="list-style-type: none"> <li>a. To avoid duplication between UFSAR Appendix B and other sections of the Unit Safety Analysis Reports.</li> <li>b. To reflect the current organization.</li> </ul>	<p>Section B.1.2.1.1 basis:</p> <ul style="list-style-type: none"> <li>a. This is an editorial change only. Responsibilities of the Manager ISEG are already described in the Unit Safety Analysis Reports.</li> <li>b. The restructuring of support functions is similar to the organizational structure that existed when Unit 2 was licensed in October 1986. The changes in reporting responsibility do not affect the functions and duties of affected groups. QA Program responsibilities have been appropriately reflected in the QA Program Responsibility Matrix (Table B-1).</li> </ul>

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.1-3 Section B.1.2.1.1 (continued)	Page 1-5 Section 1.2.2.1.C.6 1.2.2.1.D 1.2.2.1.D.1 1.2.2.1.D.2 1.2.2.1.D.3 1.2.2.1.D.4	Section B.1.2.1.1 changes (continued): a. Remove description of responsibilities for the Manager Procurement, who was part of the Nuclear Support organization. The Procurement function has been transferred to Nuclear Generation. b. Revised reference from "Figure 1-2" to "Table B-1". c. Revised QA responsibility description from "Performance of NDE such as ISI and Erosion/Corrosion" to "Performing ISI and Erosion/Corrosion Examinations (Visual and NDE)." d. Changed "Managers Quality Assurance Operations Units I and II" to "Managers Quality Assurance Units 1 and 2." The responsibilities of these managers now include Nuclear Engineering and Licensing activities, which were previously the responsibility of the Manager Quality Assurance Engineering. e. Eliminated "Manager Quality Assurance Engineering." The responsibilities of this position were divided between the Managers QA and the new position of Manager Quality Assurance Support. f. Added "Manager Quality Assurance Support" and removed the descriptions of the Supervisor Quality Assurance Audits and the Supervisor Quality Assurance Services. Responsibilities of the Manager Quality Assurance Support include all activities previously described for the Supervisor QA Audits and the Supervisor Quality Services, and also include Fuels and Procurement activities that were previously the responsibility of the Manager Quality Assurance Engineering.	Section B.1.2.1.1 reason: a. To reflect the current organization. b. Editorial. c. To be more specific regarding the type of activity. d. To reflect position title change and reassignment of duties and responsibilities within the QA organization. e. To reflect reassignment of duties and responsibilities within the QA organization. f. To reflect position title change and reassignment of duties and responsibilities within the QA organization.	Section B.1.2.1.1 basis: a. See Item b for Previous QATR Page 1-4. b. N/A c. This change more completely describes the types of examinations that may be performed. Examination scope and techniques have not been changed. d, e & f. Streamlining of the NQA organization does not change the functions or responsibilities of NQA. Adequate resources continue to be available to verify the overall quality of design, operation, maintenance, and modification activities at the Nine Mile Point Nuclear Stations.

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<p>Page B.1-4 Section B.1.2.1.1 (continued)</p> <p>B.1.2.1.2</p>	<p>Page 1-6 Section 1.2.2.1.E 1.2.3.A 1.2.3.B</p>	<p>Section B.1.2.1.1 changes (continued):</p> <p>a. Removed description of responsibilities for "Controller Nuclear Division".</p> <p>Section B.1.2.1.2 changes:</p> <p>a. Removed descriptions regarding the V.P. Electric Customer Service, General Manager Central Region, Director System Electric Operations, and Manager Meter and Laboratory Facilities.</p> <p>b. Added brief description of responsibilities of corporate support departments with reference to Unit 1 UFSAR Section XIII.A.1 and Unit 2 USAR Section 13.1.1.</p> <p>c. Revised reference from "Figure 1-2" to "Table B-1."</p>	<p>Section B.1.2.1.1 reason:</p> <p>a. To avoid duplication between UFSAR Appendix B and other sections of the Unit Safety Analysis Reports.</p> <p>Section B.1.2.1.2 reason:</p> <p>a &amp; b. Editorial. To consolidate organizational descriptions in a single location within the Unit Safety Analysis Reports, thereby avoiding duplication.</p> <p>c. Editorial. The referenced item continues to be the QA Program Responsibility Matrix (Table B-1).</p>	<p>Section B.1.2.1.1 basis:</p> <p>a. This is an editorial change only. Responsibilities of the Controller Nuclear Division are already described in Unit 1 UFSAR Section XIII.A and Unit 2 USAR Section 13.1.1. (See also the change description for Previous QATR Page 1-2.)</p> <p>Section B.1.2.1.2 basis:</p> <p>a &amp; b. These are editorial changes only. The functions and responsibilities of the corporate support departments have not changed. Their descriptions have simply been relocated within the Unit Safety Analysis Reports. QA Program responsibilities for these departments continue to be depicted on the QA Program Responsibility Matrix (Table B-1).</p> <p>c. N/A</p>
N/A	Page 1-7	Removed organization chart (added reference to Unit 1 and Unit 2 organization charts in Section B.1.2.1).	To avoid duplication between UFSAR Appendix B and other sections of the Unit Safety Analysis Reports.	This is an editorial change only. The NMPC organization is already shown on figures contained in Unit 1 UFSAR Section XIII.A and Unit 2 USAR Section 13.1. The Nuclear Quality Assurance department organization is described within the text of UFSAR Appendix B.

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Table B-1	Page 1-8 Figure 1-2	<p>Table B-1 changes:</p> <ul style="list-style-type: none"> <li>a. Changed "Figure 1-2" to "Table B-1", removed page number, and relocated table to the end of Appendix B.</li> <li>b. Revised table header to identify industry standards; i.e., NQA-1 and ANS-3.2.</li> <li>c. Added a column to identify Fire Protection QA requirements from BTP APCS 9.5-1, Appendix A, and merged Fire Protection QA responsibilities (from FPQAP Figure 1.1) into Table B-1.</li> <li>d. Added a column to identify Risk Management (RM) QA Program responsibilities.</li> <li>e. Removed the column for Nuclear Support (NSP). The Nuclear Support organization has been eliminated.</li> <li>f. Added a column to identify Nuclear Licensing (NL) QA Program responsibilities.</li> <li>g. Removed the column for Nuclear Security (NS).</li> </ul>	<p>Table B-1 reason:</p> <ul style="list-style-type: none"> <li>a. Editorial. These changes are consistent with the FSAR style and format.</li> <li>b. Editorial.</li> <li>c. To incorporate Fire Protection QA requirements into the overall QA Program description.</li> <li>d. To incorporate Fire Protection QA requirements into the overall QA Program description.</li> <li>e. To reflect the current organization.</li> <li>f. To reflect the current organization.</li> <li>g. To depict responsibilities at a higher level rather than listing lower-tier organizational units.</li> </ul>	<p>Table B-1 basis:</p> <ul style="list-style-type: none"> <li>a. N/A</li> <li>b. N/A</li> <li>c. This is an administrative change only. These requirements were previously contained in Figure 1-1 of the FPQAP. Overall Fire Protection QA Program responsibilities are not reduced.</li> <li>d. This is an administrative change only. The Risk Management responsibilities for Fire Protection QA activities were previously contained in Figure 1-1 of the FPQAP and have not been altered.</li> <li>e. QA Program responsibilities of Nuclear Support have been transferred to Nuclear Licensing, Nuclear Generation or Nuclear Engineering as appropriate. See also the change description for Previous QATR Page 1-3.</li> <li>f. This is an administrative change only. Nuclear Licensing's responsibilities were previously grouped under the Nuclear Support column, but are now shown separately.</li> <li>g. This is an administrative change only. QA Program responsibilities of Nuclear Security are now included as part of the Nuclear Generation column.</li> </ul>

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Table B-1 (continued)	Page 1-8 Figure 1-2 (continued)	<p>Table B-1 changes (continued):</p> <p>h. Consolidated the columns for Meter &amp; Test (MT) and Meter &amp; Laboratory (ML) into a single Electric Customer Service Strategic Business Unit (EC) column.</p> <p>i. Transferred the Fire Protection QA Program responsibilities of the Meter and Laboratory department from FPQAP Figure 1.1 to Table B-1, under the "EC" column. This resulted in the addition of "S" entries in the EC column for Criteria III, IV, VII, XIV, XV, and XVIII.</p> <p>j. The definition of the "P" designation has been expanded by adding "including any Support Responsibilities" and changed "S", "P" identifications to reflect new definition. The following matrix entries were changed accordingly for "P,S" to "P":</p> <ol style="list-style-type: none"> <li>(1) Criterion II, Column NE</li> <li>(2) Criterion VII, Column NE</li> <li>(3) Criterion XII, Column EC (previously Column MT)</li> </ol>	<p>Table B-1 reason:</p> <p>h. To depict responsibilities at a higher level rather than listing lower-tier organizational units.</p> <p>i. To incorporate Fire Protection QA requirements into the overall QA Program description.</p> <p>j. To clarify Primary and Support responsibilities. Alleviates the need to list both a "P" and an "S" in the matrix column for a single program element.</p>	<p>Table B-1 basis:</p> <p>h. This is an administrative change only. The Electric Customer Service Strategic Business Unit (EC) column encompasses the previous MT and ML columns. QA Program responsibilities are not reduced.</p> <p>i. This is an administrative change only. Fire Protection QA Program responsibilities are not reduced.</p> <p>j. This change recognizes that an organization with primary responsibility for a QA Program element may also have an associated support responsibility. QA Program responsibilities are not affected by this change.</p>

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Table B-1 (continued)	Page 1-8 Figure 1-2 (continued)	<p>Table B-1 changes (continued):</p> <p>k. In the Nuclear Generation (NG) column, changed "S" to "P" for Criterion II, changed "P" to "S" for Criterion XV, and changed "P" to "S" for Criterion XVIII.</p> <p>l. In the Nuclear Engineering (NE) column, added an "S" entry for Criterion XIV and changed "P" to "S" for Criterion XVIII.</p> <p>m. In the Nuclear Quality Assurance (NQA) column, changed "R" to "S,R" for Criterion VII, changed "R" to "S,R" for Criterion XV, and changed "S,R" to "P,R" for Criterion XVII.</p> <p>n. In the Electric Customer Service Strategic Business Unit (EC) column, changed "S" to "P" for Criterion XVII. ("S" was previously shown in the MT and ML columns.)</p>	<p>Table B-1 reason:</p> <p>k. To reflect current organizational structure, responsibilities, and single-point accountability.</p> <p>l. To reflect current organizational responsibilities.</p> <p>m. To reflect current organizational responsibilities.</p> <p>n. To reflect current organizational responsibilities.</p>	<p>Table B-1 basis:</p> <p>k. Overall QA Program responsibilities are not reduced. These changes account for the elimination of the Nuclear Support organization and the resulting addition of the Training, Procurement, and Emergency Preparedness functions to Nuclear Generation. The indicated responsibilities are consistent with NMPC procedural requirements.</p> <p>l. Overall QA Program responsibilities are not reduced. The indicated responsibilities are consistent with NMPC procedural requirements.</p> <p>m. Overall QA Program responsibilities are not reduced. The indicated responsibilities are consistent with NMPC procedural requirements.</p> <p>n. Overall QA Program responsibilities are not reduced. The indicated responsibilities are consistent with NMPC procedural requirements.</p>

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.2-1 Section B.2.1  B.2.2.1  B.2.2.2	Page 2-1 Section 2.1  2.2.1  2.2.2	Section B.2.1 changes: a. Added discussion of the Fire Protection QA Program and references to the Unit 1 UFSAR Appendix 10A and Unit 2 USAR Appendix 9A.  b. Added "fire protection" to activities performed under the QA Program.  Section B.2.2.1 - No changes.  Section B.2.2.2 changes: a. Changed "Appendix C Matrix" to "Table B-2."	Section B.2.1 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.  b. To incorporate Fire Protection QA requirements into the overall QA Program description.  Section B.2.2.2 reason: a. Editorial.	Section B.2.1 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Sections 1.1 and 2.0. (See Enclosure C for FPQAP changes.)  b. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 2.2. (See Enclosure C for FPQAP changes.)  Section B.2.2.2 basis: a. N/A
Page B.2-2 Section B.2.2.2 (continued)  B.2.2.3  B.2.2.4 B.2.2.5	Page 2-1 Section 2.2.2 (continued)  Page 2-2 Section 2.2.3  2.2.4 2.2.5	Section B.2.2.2 (continued) - No changes.  Section B.2.2.3 changes: a. This section has been rewritten to reflect that the Nuclear Division Policy and Directives Manual sets forth the overall program requirements.  Section B.2.2.4 - No changes. Section B.2.2.5 - No changes.	Section B.2.2.3 reason: a. To be consistent with current Nuclear Division Policies and Directives.	Section B.2.2.3 basis: a. NMPC's policy regarding Quality Assurance matters has not changed. That policy continues to be embodied in the Nuclear Division Policy and Directives.



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Page B.2-3 Section B.2.2.5 (continued) B.2.2.6  B.2.2.6 (continued) B.2.2.7  B.2.2.8	Page 2-2 (continued) Section 2.2.5 (continued) 2.2.6  Page 2-3 Section 2.2.6 (continued) 2.2.7  2.2.8	Section B.2.2.5 (continued) - No changes. Section B.2.2.6 - No changes.  Section B.2.2.6 (continued) - No changes. Section B.2.2.7 changes: a. Added "Fire Protection Program" between "are applied to" and "emergency plans."  b. Deleted "nuclear" from between "the" and "station". Section B.2.2.8 - No changes.	Section B.2.2.7 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.  b. Editorial.	Section B.2.2.7 basis: a. This is an administrative change only. The requirements were previously contained in FPQAP, Revision 3, Section 2.0. (See Enclosure C for FPQAP changes.) b. N/A
Page B.2-4 Section B.2.2.8 (continued) B.2.2.9 B.2.2.10  B.2.2.11 B.2.2.12	Page 2-3 (continued) Section 2.2.8 (continued) 2.2.9 2.2.10  Page 2-4 Section 2.2.11 2.2.12	Section B.2.2.8 (continued) - No changes. Section B.2.2.9 - No changes. Section B.2.2.10 changes: a. Changed "Appendix A and B of this Topical Report" to "Tables B-3 and B-4."  Section B.2.2.11 - No changes. Section B.2.2.12 - No changes.	Section B.2.2.10 reason: a. Editorial.	Section B.2.2.10 basis: a. N/A
Page B.2-5 Section B.2.2.12 (continued) B.2.2.13 B.2.2.14  B.2.2.14 (continued)	Page 2-4 (continued) Section 2.2.12 (continued) 2.2.13 2.2.14  Page 2-5 Section 2.2.14 (continued)	Section B.2.2.12 (continued) - No changes. Section B.2.2.13 - No changes. Section B.2.2.14 - No changes.  Section B.2.2.14 (continued) - No changes.		

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<p>Page B.2-6 Section B.2.2.14 (continued) B.2.2.15 B.2.2.16</p> <p>B.2.2.17</p> <p>B.2.2.18</p>	<p>Page 2-5 Section 2.2.14 (continued) 2.2.15 2.2.16</p> <p>2.2.17</p> <p>Page 2-6 Section 2.2.18</p>	<p>Section B.2.2.14 (continued) - No changes. Section B.2.2.15 - No changes. Section B.2.2.16 changes: a. Added "and FSAR sections" after "Technical Specifications."</p> <p>Section B.2.2.17 changes: a. Added "Generation" after "Vice President Nuclear." b. Added "sections" after "FSAR". c. Changed "Administrative Procedures (APs)" to "Generation Administrative Procedures (GAPs)".</p> <p>Section B.2.2.18 - No changes.</p>	<p>Section B.2.2.16 reason: a. Editorial, to indicate that the SRAB is also discussed in the Unit Safety Analysis Reports.</p> <p>Section B.2.2.17 reason: a. Editorial, to correct position title. b. Editorial. c. To be consistent with current Nuclear Division procedure titles.</p>	<p>Section B.2.2.16 basis: a. N/A</p> <p>Section B.2.2.17 basis: a. N/A b. N/A c. The GAPs have replaced the APs and contain the same requirements regarding SORC responsibilities.</p>
<p>Page B.2-7 Section B.2.2.18 (continued)</p>	<p>Page 2-6 Section 2.2.18 (continued)</p>	<p>Section B.2.2.18 (continued) - No changes.</p>		
<p>Page B.3-1 Section B.3.1 B.3.2.1 B.3.2.2 B.3.2.3 B.3.2.4 B.3.2.5</p>	<p>Page 3-1 Section 3.1 3.2.1 3.2.2 3.2.3 3.2.4 3.2.5</p>	<p>Section B.3.1 - No changes. Section B.3.2.1 - No changes. Section B.3.2.2 - No changes. Section B.3.2.3 - No changes. Section B.3.2.4 - No changes. Section B.3.2.5 - No changes.</p>		

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Page B.3-2 Section B.3.2.6  B.3.2.7 B.3.2.8 B.3.2.9	Page 3-1 (continued) Section 3.2.6  Page 3-2 Section 3.2.7 3.2.8 3.2.9	Section B.3.2.6 - No changes.  Section B.3.2.7 - No changes. Section B.3.2.8 - No changes. Section B.3.2.9 changes: a. Deleted the word "single" preceding "individual".	Section B.3.2.9 reason: a. Editorial.	Section B.3.2.9 basis: a. N/A
Page B.3-3 Section B.3.2.10  B.3.2.11 B.3.2.12 B.3.2.13	Page 3-2 (continued) Section 3.2.10  Page 3-3 Section 3.2.11 3.2.12 3.2.13	Section B.3.2.10 - No changes.  Section B.3.2.11 - No changes. Section B.3.2.12 - No changes. Section B.3.2.13 - No changes.		
Page B.3-4 Section B.3.2.13 (continued) B.3.2.14 B.3.2.15	Page 3-3 (continued) Section 3.2.13 (continued) 3.2.14	Section B.3.2.13 (continued) - No changes. Section B.3.2.14 - No changes. Section B.3.2.15 changes: a. Added section describing design control for fire protection systems, equipment, and components.	Section B.3.2.15 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.3.2.15 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 3.0. (See Enclosure C for FPQAP changes.)

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Page B.4-1 Section B.4.1 B.4.2.1 B.4.2.2 B.4.2.3 B.4.2.4 B.4.2.5	Page 4-1 Section 4.1 4.2.1 4.2.2 4.2.3 4.2.4 4.2.5	Section B.4.1 - No changes. Section B.4.2.1 - No changes. Section B.4.2.2 - No changes. Section B.4.2.3 - No changes. Section B.4.2.4 - No changes. Section B.4.2.5 - No changes.		
Page B.4-2 Section B.4.2.5 (continued) B.4.2.6 B.4.2.7 B.4.2.8 B.4.2.9	Page 4-2 Section 4.2.5 (continued) 4.2.6 4.2.7 4.2.8	Section B.4.2.5 - No changes. Section B.4.2.6 - No changes. Section B.4.2.7 - No changes. Section B.4.2.8 - No changes. Section B.4.2.9 changes: a. Added section describing procurement document control requirements as applied to the Fire Protection Program.	Section B.4.2.9 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.4.2.9 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 4.0. (See Enclosure C for FPQAP changes.)
Page B.4-3 Section B.4.2.9 (continued)	N/A	Section B.4.2.9 changes (continued): a. See above.	Section B.4.2.9 reason: a. See above.	Section B.4.2.9 basis: a. See above.

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.5-1 Section B.5.1  B.5.2.1  B.5.2.2  B.5.2.3 B.5.2.4 B.5.2.5	Page 5-1 Section 5.1  5.2.1  5.2.2  5.2.3 5.2.4	Section B.5.1 changes: a. Changed "App. A" to "Table B-3".  Section B.5.2.1 - No changes.  Section B.5.2.2 changes: a. Changed "such as" to "e.g.," (two places).  Section B.5.2.3 - No changes. Section B.5.2.4 - No changes. Section B.5.2.5 changes: a. Added section addressing instructions, procedures, and drawings relating to the Fire Protection Program.	Section B.5.1 reason: a. Editorial.  Section B.5.2.2 reason: a. Editorial.  Section B.5.2.5 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.5.1 basis: a. N/A  Section B.5.2.2 basis: a. N/A  Section B.5.2.5 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 5.0. (See Enclosure C for FPQAP changes.)
Page B.6-1 Section B.6.1 B.6.2.1 B.6.2.2  B.6.2.3	Page 6-1 Section 6.1 6.2.1 6.2.2  Page 6-2 Section 6.2.3	Section B.6.1 - No changes. Section B.6.2.1 - No changes. Section B.6.2.2 - No changes.  Section B.6.2.3 - No changes.		
Page B.6-2 Section B.6.2.3 (continued) B.6.2.4 B.6.2.5 B.6.2.6	Page 6-2 Section 6.2.3 (continued) 6.2.4 6.2.5 6.2.6	Section B.6.2.3 (continued) - No changes. Section B.6.2.4 - No changes. Section B.6.2.5 - No changes. Section B.6.2.6 - No changes.		

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.7-1 Section B.7.1 B.7.2.1 B.7.2.2 B.7.2.3	Page 7-1 Section 7.1 7.2.1 7.2.2 7.2.3	Section B.7.1 - No changes. Section B.7.2.1 - No changes. Section B.7.2.2 - No changes. Section B.7.2.3 - No changes.		
Page B.7-2 Section B.7.2.3 (continued)  B.7.2.4 B.7.2.5	Page 7-2 Section 7.2.3 (continued)  7.2.4 7.2.5	Section B.7.2.3 changes (continued): a. In Item 2.c, deleted "Such that" preceding "receiving".  Section B.7.2.4 - No changes. Section B.7.2.5 - No changes.	Section B.7.2.3 reason: a. Editorial.	Section B.7.2.3 basis: a. N/A
Page B.7-3 Section B.7.2.6 B.7.2.7  B.7.2.8 B.7.2.9  B.7.2.10	Page 7-2 (continued) Section 7.2.6 7.2.7  Page 7-3 Section 7.2.8 7.2.9	Section B.7.2.6 - No changes. Section B.7.2.7 - No changes.  Section B.7.2.8 - No changes. Section B.7.2.9 - No changes.  Section B.7.2.10 changes: a. Added section describing control of purchased material, equipment, and services for fire protection items.	Section B.7.2.10 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.7.2.10 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 6.0. (See Enclosure C for FPQAP changes.)
Page B.7-4 Section B.7.2.10 (continued)	N/A	Section B.7.2.10 changes (continued): a. See above.	Section B.7.2.10 reason: a. See above.	Section B.7.2.10 basis: a. See above.

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.8-1 Section B.8.1 B.8.2.1 B.8.2.2 B.8.2.3 B.8.2.4	Page 8-1 Section 8.1 8.2.1 8.2.2 8.2.3 8.2.4	Section B.8.1 - No changes. Section B.8.2.1 - No changes. Section B.8.2.2 - No changes. Section B.8.2.3 - No changes. Section B.8.2.4 - No changes.		
Page B.9-1 Section B.9.1 B.9.2.1 B.9.2.2 B.9.2.3 B.9.2.4 B.9.2.5	Page 9-1 Section 9.1 9.2.1 9.2.2 9.2.3 9.2.4 9.2.5	Section B.9.1 - No changes. Section B.9.2.1 - No changes. Section B.9.2.2 - No changes. Section B.9.2.3 - No changes. Section B.9.2.4 - No changes. Section B.9.2.5 - No changes.		
Page B.9-2 Section B.9.2.5 (continued) B.9.2.6 B.9.2.7 B.9.2.8 B.9.2.9	Page 9-2 Section 9.2.5 (continued) 9.2.6 9.2.7 9.2.8 9.2.9	Section B.9.2.5 (continued) - No changes. Section B.9.2.6 - No changes. Section B.9.2.7 - No changes. Section B.9.2.8 - No changes. Section B.9.2.9 - No changes.		
Page B.9-3 Section B.9.2.9 (continued)	Page 9-2 Section 9.2.9 (continued)	Section B.9.2.9 (continued) - No changes.		
Page B.10-1 Section B.10.1 B.10.2.1 B.10.2.2	Page 10-1 Section 10.1 10.2.1 10.2.2	Section B.10.1 - No changes. Section B.10.2.1 - No changes. Section B.10.2.2 - No changes.		

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
<p>Page B.10-2 Section B.10.2.3</p> <p>B.10.2.4 B.10.2.5 B.10.2.6 B.10.2.7 B.10.2.8</p> <p>B.10.2.9</p>	<p>Page 10-2 Section 10.2.3</p> <p>10.2.4 10.2.5 10.2.6 10.2.7 10.2.8</p> <p>Page 10-3 Section 10.2.9</p>	<p>Section B.10.2.3 changes: a. Added "and inspection/surveillance of activities affecting fire protection."</p> <p>Section B.10.2.4 - No changes. Section B.10.2.5 - No changes. Section B.10.2.6 - No changes. Section B.10.2.7 - No changes. Section B.10.2.8 - No changes.</p> <p>Section B.10.2.9 - No changes.</p>	<p>Section B.10.2.3 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.</p>	<p>Section B.10.2.3 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 7.4. (See Enclosure C for FPQAP changes.)</p>
<p>Page B.10-3 Section B.10.2.9 (continued)</p> <p>B.10.2.10</p>	<p>Page 10-3 Section 10.2.9 (continued)</p>	<p>Section B.10.2.9 (continued) - No changes.</p> <p>Section B.10.2.10 changes: a. Added section describing inspection and surveillance of activities affecting fire protection.</p>	<p>Section B.10.2.10 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.</p>	<p>Section B.10.2.10 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 7.0. (See Enclosure C for FPQAP changes.)</p>



NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.11-1 Section B.11.1 B.11.2.1 B.11.2.2  B.11.2.3	Page 11-1 Section 11.1 11.2.1 11.2.2  Page 11-2 Section 11.2.3	Section B.11.1 - No changes. Section B.11.2.1 - No changes. Section B.11.2.2 - No changes.  Section B.11.2.3 - No changes.		
Page B.11-2 Section B.11.2.3 (continued) B.11.2.4 B.11.2.5 B.11.2.6	Page 11-2 Section 11.2.3 (continued) 11.2.4 11.2.5	Section B.11.2.3 (continued) - No changes. Section B.11.2.4 - No changes. Section B.11.2.5 - No changes. Section B.11.2.6 changes: a. Added section describing tests and test control for fire protection items.	Section B.11.2.6 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.11.2.6 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Sections 8.1 and 8.2. (See Enclosure C for FPQAP changes.)
Page B.12-1 Section B.12.1 B.12.2.1 B.12.2.2 B.12.2.3 B.12.2.4 B.12.2.5 B.12.2.6 B.12.2.7	Page 12-1 Section 12.1 12.2.1 12.2.2 12.2.3 12.2.4 12.2.5 12.2.6 12.2.7	Section B.12.1 - No changes. Section B.12.2.1 - No changes. Section B.12.2.2 - No changes. Section B.12.2.3 - No changes. Section B.12.2.4 - No changes. Section B.12.2.5 - No changes. Section B.12.2.6 - No changes. Section B.12.2.7 - No changes.		

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.12-2 Section B.12.2.7 (continued) B.12.2.8 B.12.2.9	Page 12-1 Section 12.2.7 (continued) 12.2.8	Section B.12.2.7 (continued) - No changes. Section B.12.2.8 - No changes. Section B.12.2.9 changes: a. Added section describing control of measuring and test equipment as it applies to the Fire Protection Program.	Section B.12.2.9 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.12.2.9 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 10.0. (See Enclosure C for FPQAP changes.)
Page B.13-1 Section B.13.1 B.13.2.1 B.13.2.2	Page 13-1 Section 13.1 13.2.1 13.2.2	Section B.13.1 - No changes. Section B.13.2.1 - No changes. Section B.13.2.2 - No changes.		
Page B.14-1 Section B.14.1 B.14.2.1 B.14.2.2 B.14.2.3 B.14.2.4 B.14.2.5 B.14.2.6 B.14.2.7	Page 14-1 Section 14.1 14.2.1 14.2.2 14.2.3 14.2.4 14.2.5 14.2.6	Section B.14.1 - No changes. Section B.14.2.1 - No changes. Section B.14.2.2 - No changes. Section B.14.2.3 - No changes. Section B.14.2.4 - No changes. Section B.14.2.5 - No changes. Section B.14.2.6 - No changes. Section B.14.2.7 changes: a. Added section describing inspection, test, and operating status for fire protection items.	Section B.14.2.7 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.14.2.7 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 9.0. (See Enclosure C for FPQAP changes.)

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.15-1 Section B.15.1 B.15.2.1 B.15.2.2 B.15.2.3 B.15.2.4 B.15.2.5 B.15.2.6 B.15.2.7       B.15.2.8 B.15.2.9	Page 15-1 Section 15.1 15.2.1 15.2.2 15.2.3 15.2.4 15.2.5 15.2.6 15.2.7       15.2.8 15.2.9	Section B.15.1 - No changes. Section B.15.2.1 - No changes. Section B.15.2.2 - No changes. Section B.15.2.3 - No changes. Section B.15.2.4 - No changes. Section B.15.2.5 - No changes. Section B.15.2.6 - No changes. Section B.15.2.7 changes: a. Added "on an audit/surveillance basis" following "documentation".       Section B.15.2.8 - No changes. Section B.15.2.9 - No changes.	Section B.15.2.7 reason: a. To clarify the method of documentation review.	Section B.15.2.7 basis: a. The NQA Department reviews nonconformance documentation on an audit/surveillance basis. This clarification does not change measures established to control nonconformances.

NEW UFSAR APPENDIX B (NMPC-QA/R-I) PAGE/SECTION	PREVIOUS NMPC-QATR-I REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
<p>Page B.15-2 Section B.15.2.9 (continued) B.15.2.10</p> <p>B.15.2.11 B.15.2.12 B.15.2.13</p> <p>B.15.2.14</p> <p>B.15.2.15</p>	<p>Page 15-1 Section 15.2.9 (continued) 15.2.10</p> <p>Page 15-2 Section 15.2.11 15.2.12 15.2.13</p> <p>15.2.14</p>	<p>Section B.15.2.9 (continued) - No changes. Section B.15.2.10 - No changes.</p> <p>Section B.15.2.11 - No changes. Section B.15.2.12 - No changes. Section B.15.2.13 changes: a. Replaced "based on the results/inspection of QA activities" with "based on quality trends identified".</p> <p>Section B.15.2.14 - No changes.</p> <p>Section B.15.2.15 changes: a. Added section describing measures to control nonconforming fire protection materials, parts, or components.</p>	<p>Section B.15.2.13 reason: a. To be consistent with Section B.15.2.12.</p> <p>Section B.15.2.15 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.</p>	<p>Section B.15.2.13 basis: a. This revision is consistent with Section B.15.2.12, which states that "quality trends" are identified when evaluating documents that identify nonconformances.</p> <p>Section B.15.2.15 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 11.2. (See Enclosure C for FPQAP changes.)</p>
<p>Page B.16-1 Section B.16.1 B.16.2.1 B.16.2.2 B.16.2.3 B.16.2.4 B.16.2.5</p>	<p>Page 16-1 Section 16.1 16.2.1 16.2.2 16.2.3 16.2.4</p>	<p>Section B.16.1 - No changes. Section B.16.2.1 - No changes. Section B.16.2.2 - No changes. Section B.16.2.3 - No changes. Section B.16.2.4 - No changes. Section B.16.2.5 changes: a. Added section describing corrective actions for conditions adverse to fire protection.</p>	<p>Section B.16.2.5 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.</p>	<p>Section B.16.2.5 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Sections 11.1 and 11.3. (See Enclosure C for FPQAP changes.)</p>

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.17-1 Section B.17.1 B.17.2.1 B.17.2.2          B.17.2.3	Page 17-1 Section 17.1 17.2.1 17.2.2          17.2.3	Section B.17.1 -- No changes. Section B.17.2.1 - No changes. Section B.17.2.2 change: a. Added Item 10, "Records for activities affecting the Fire Protection Program" and renumbered previous Item 10 as Item 11.          Section B.17.2.3 - No changes.	Section B.17.2.2 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.17.2.2 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 12.0. (See Enclosure C for FPQAP changes.)
Page B.17-2 Section B.17.2.3 (continued) B.17.2.4 B.17.2.5          B.17.2.6 B.17.2.7 B.17.2.8	Page 17-1 (continued) Section 17.2.3 (continued) 17.2.4 17.2.5       Page 17-2 Section 17.2.6 17.2.7 17.2.8	Section B.17.2.3 (continued) - No changes. Section B.17.2.4 - No changes. Section B.17.2.5 - No changes.          Section B.17.2.6 - No changes. Section B.17.2.7 - No changes. Section B.17.2.8 - No changes.		

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page B.18-1 Section B.18.1 B.18.2.1 B.18.2.2 B.18.2.3 B.18.2.4 B.18.2.5  B.18.2.6	Page 18-1 Section 18.1 18.2.1 18.2.2 18.2.3 18.2.4 18.2.5  Page 18-2 Section 18.2.6	Section B.18.1 - No changes. Section B.18.2.1 - No changes. Section B.18.2.2 - No changes. Section B.18.2.3 - No changes. Section B.18.2.4 - No changes. Section B.18.2.5 - No changes.  Section B.18.2.6 - No changes.		
Page B.18-2 Section B.18.2.6 (continued) B.18.2.7 B.18.2.8 B.18.2.9 B.18.2.10 B.18.2.11 B.18.2.12	Page 18-2 Section 18.2.6 (continued) 18.2.7 18.2.8 18.2.9 18.2.10 18.2.11	Section B.18.2.6 (continued) - No changes. Section B.18.2.7 - No changes. Section B.18.2.8 - No changes. Section B.18.2.9 - No changes. Section B.18.2.10 - No changes. Section B.18.2.11 - No changes. Section B.18.2.12 changes: a. Added section describing QA audits conducted for the Fire Protection Program.	Section B.18.2.12 reason: a. To incorporate Fire Protection QA requirements into the overall QA Program description.	Section B.18.2.12 basis: a. This is an administrative change only. These requirements were previously contained in FPQAP, Revision 3, Section 13.0. (See Enclosure C for FPQAP changes.)
Page B.18-3 Section B.18.2.12 (continued)	N/A	Section B.18.2.12 changes (continued): a. See above.	Section B.18.2.12 reason: a. See above.	Section B.18.2.12 basis: a. See above.

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Table B-3 Sheet 1 of 1	Appendix A Page A-1 Page A-2	Table B-3 changes: a. Changed title from "Appendix A" to "Table B-3". b. Changed format. c. Within the footnote, changed "Appendix A" to "this Table" and "Appendix B" to "Table B-4". d. Changed items in the Revision/Date column to show the revision number first, followed by the date (consistent with the column title). e. Added Item 11, BTP APCS 9.5.1, Appendix A.	Table B-3 reason: a. Editorial. b. Editorial. c. Editorial. d. Editorial. e. To incorporate Fire Protection QA requirements into the overall QA Program description.	Table B-3 basis: a. N/A b. N/A c. N/A d. N/A e. This is an administrative change only. The commitment to BTP APCS 9.5.1, Appendix A, was previously contained in FPQAP, Revision 3, Section 2.1. The commitment to the BTP has not been altered.
Table B-4 Sheet 1 of 8 Sheet 2 of 8 Sheet 3 of 8 Sheet 4 of 8 Sheet 5 of 8 Sheet 6 of 8 Sheet 7 of 8 Sheet 8 of 8	Appendix B Page B-1 Page B-2 Page B-3 Page B-4 Page B-5 Page B-6 Page B-7 Page B-8 Page B-9 Page B-10 Page B-11	Table B-4 changes: a. Changed format. b. Changed Title from "Appendix B, Interpretations and Exceptions of Appendix A Documents", to "Table B-4, Interpretations and Exceptions of Table B-3 Documents." c. Changed references to Appendix A and Appendix B to Table B-3 and B-4, respectively. d. In Item 5.d, revised reference from "Question and Answer section" to "Appendix 9C".	Table B-4 reason: a. Editorial. b. Editorial. c. Editorial. d. Editorial. Heavy Loads Analysis was incorporated into Appendix 9C of the Unit 2 USAR.	Table B-4 basis: a. N/A b. N/A c. N/A d. N/A

NEW UFSAR APPENDIX B (NMPC-QATR-1) PAGE/SECTION	PREVIOUS NMPC-QATR-1 REVISION 7 PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY 10CFR50 APPENDIX B AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Table B-2 Sheet 1 of 1	Appendix C Page C-1	Table B-2 changes: a. Changed "Appendix C" to "Table B-2". b. Changed format. c. Revised the list of QAPs and NIPs.	Table B-2 reason: a. Editorial. b. Editorial. c. To be consistent with current procedure numbers.	Table B-2 basis: a. N/A b. N/A c. The revisions to the referenced procedure numbers do not affect implementation of any requirements of the Quality Assurance Program.



ENCLOSURE C  
TO NMP1L 0768

**INCORPORATION OF THE FPQAP  
INTO THE NMPC-QATR-1  
(UFSAR APPENDIX B)**

## ENCLOSURE C - INCORPORATION OF THE FPQAP INTO THE NMPC-QATR-1 (UFSAR APPENDIX B)

Page 1 of 21

The following table provides the identification, reason, and basis for changes made to the NMPC-FPQAP since the submittal of Revisions 2 and 3. The table also provides a cross-reference between FPQAP Revision 2, Revision 3, and the new Unit 1 FSAR (Updated) Appendix B, as an aid to understanding the manner in which the program descriptions were combined.

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page i	Page 2	Page B-1	Eliminated NMPC-FPQAP Table of Contents.	Editorial. The Fire Protection Quality Assurance Program has been combined with applicable sections of the NMPC-QATR-1 (UFSAR Appendix B).	N/A
Page ii	Page 3	Page B.0-1	Eliminated Introduction and Scope Section of the FPQAP by including Fire Protection Program Quality Assurance requirements into the applicable sections of NMPC-QATR-1 (UFSAR Appendix B).	To combine the FPQAP with the overall Quality Assurance Program description.	Implementation of fire protection quality assurance requirements is not affected by the combined program description.
Page iii Quality Assurance Policy	Page 4	Page B.0-1 Section B.0	Removed QA Policy from the NMPC-FPQAP and NMPC-QATR-1. Added reference to Nuclear Division Policy and Directives Manual in UFSAR Appendix B, Section B.0.	To eliminate a policy statement that was redundant to that contained within the Nuclear Division Policy and Directives Manual.	NMPC's policy regarding Quality Assurance matters has not changed. It continues to be embodied in the Nuclear Division Policy and Directives Manual.
Page iii and v	Page 5 thru 8	N/A	Removed Summary of Changes from FPQAP.	Editorial. The identification, reason, and basis for each change are provided in this enclosure.	N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 1 Section 1.0 1.1	Page 9 Section 1.0 (Revised) 1.1 (Revised)	Page B.1-1 Section B.0 B.1.1 Page B.2-1 Section B.2.1	<p>Change:</p> <p>a. Revision 3 changed Section title from "Organization" to "Overview".</p> <p>b. Revision 3 added "Fire Extinguishment" and "Smoke Removal" and replaced "housekeeping" with "Control of Combustibles and Ignition Sources".</p> <p>c. The Revision 3 changes and FPQAP Section 1.1 have been superseded by Sections B.1 and B.2. Section B.1.1 was revised to include fire protection activities. Sections B.1.2.1.1 and B.2.1 have been revised to reference Unit 1 FSAR (Updated) Appendix 10A and Unit 2 USAR Appendix 9A for a description of the Fire Protection Program.</p>	<p>Reason:</p> <p>a. Editorial. To more correctly describe the purpose of the section.</p> <p>b. Editorial. Expanded program definition to include additional information from Attachment 2 of FPQAP Revision 2.</p> <p>c. Editorial. By combining the FPQAP with the overall QA Program description, the Revision 3 changes to Sections 1.0 and 1.1 no longer apply. The combined QA Program description eliminates redundant information by referencing other sections of the Unit Safety Analysis Reports.</p>	<p>Basis:</p> <p>a. N/A</p> <p>b. N/A</p> <p>c. N/A</p>

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 1 Section 1.2	Page 9 Section 1.2	Page B.1-2 Section B.1.2.1.1	Change: a. Revision 3 revised section title from "Implementation" to "Organization".  b. Revision 3 removed the description of Executive Vice President-Nuclear responsibilities.  c. The Revision 3 changes and FPQAP Section 1.2 have been superseded by Section B.1.2.1.1.	Reason: a. Editorial.  b. Editorial. To reflect only the main administrative structure of NMPC's fire protection program.  c. NMPC's current Organizational structure, including the responsibilities of the Executive Vice President-Nuclear, is described in Section B.1.2.1.1.	Basis: a. N/A  b. N/A  c. N/A
Page 1 Section 1.2.A	Page 9 Section 1.2.1 (Revised)	Page B.1-2 Section B.1.2.1.1	Change: a. Revision 3 changed title from "General Superintendent-Nuclear Generation" to "Vice President Nuclear Generation".  b. The Revision 3 changes and Section 1.2.1 have been superseded by Section B.1.2.1.1.	Reason: a. To reflect current title.  b. FPQAP Section 1.2.1 has been combined with QATR Section 1.2.2. The title change was previously identified in QATR, Revision 6, Section 1.2.2, which is now Section B.1.2.1.1.	Basis: a. The title change is administrative and provides the position with greater authority.  b. This change was previously addressed in NMPC-QATR-1, Revision 6.

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 1 Section 1.2.A.1 1.2.A.2 1.2.A.3 Page 2 Section 1.2.A.4 1.2.A.5 1.2.A.6 Page 3 Section 1.2.A.6 1.2.A.7	Page 10 Section 1.2.1.1 (Revised)	Page B.1-2	Change: a. Revision 3 changed the title of "Station Superintendents, Unit 1 and Unit 2" to "Plant Managers" and included the responsibilities of the Site Superintendent Maintenance, Technical Superintendent, Superintendent Training, Site Fire Program Coordinator, Supervisor Operations Support, and Unit Supervisors Fire Protection under the Plant Managers to whom they report.  b. The Revision 3 change and FPQAP Section 1.2.1.1 have been superseded by Section B.1.2.1.1.	Reason: a. To reflect title change and to reflect only the main administrative structure of NMPC's Fire Protection Program. Fire protection implementation responsibilities are delineated in implementing procedures.  b. Editorial. Position title changes were previously identified in QATR, Revision 6, Section 1.2.2, which is now Section B.1.2.1.1. Organizational responsibilities for the Fire Protection Program are described in the Unit Safety Analysis Reports which are referenced in Section B.1.2.1.1.	Basis: a. The title change is administrative in nature and does not change the functions or responsibilities of the position. The described responsibilities reflect single-point accountability and do not alter Fire Protection QA Program elements.  b. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 4 Section 1.2.B Page 5 Section 1.2.B.1 1.2.B.2	Page 10 Section 1.2.2	Page B.1-2 Section B.1.2.1.1	<p>Change:</p> <p>a. Revision 3 changed the title of "Vice President Nuclear Engineering and Licensing" to Vice President Nuclear Engineering", revised responsibility description and eliminated the description of responsibilities for the Fire Protection Engineer and Manager Nuclear Consulting Services.</p> <p>b. The Revision 3 change and FPQAP Section 1.2.2 have been superseded by Section B.1.2.1.1</p>	<p>Reason:</p> <p>a. To reflect that Nuclear Licensing no longer reports to the Vice President Nuclear Engineering, and to reflect only the main administrative structure of the Fire Protection Program.</p> <p>b. Editorial. Position title changes were previously identified in QATR, Revision 6, Section 1.2.2, which is now Section B.1.2.1.1. Organizational responsibilities for the Fire Protection Program are described in the Unit Safety Analysis Reports which are now referenced in Section B.1.2.1.1.</p>	<p>Basis:</p> <p>a. The change to the organizational structure does not affect functions or duties related to Fire Protection QA Program elements. The revised responsibility description only reflects single-point accountability; it does not affect the functions or duties of subordinate positions.</p> <p>b. N/A</p>
Page 5 & 6 Section 1.2.B.2.a	Page 10 Section 1.2.2.1	Page B.1-2 Section B.1.2.1.1	<p>Change:</p> <p>a. Revision 3 provided a more general description of the Fire Protection Program Manager's responsibilities.</p> <p>b. The Revision 3 change and FPQAP Section 1.2.2.1 have been superseded by Section B.1.2.1.1.</p>	<p>Reason:</p> <p>a. Editorial. To provide a more consolidated description of responsibilities.</p> <p>b. Editorial. The responsibilities of the Fire Protection Program Manager are described in the Unit Safety Analysis Reports which are referenced in Section B.1.2.1.1.</p>	<p>Basis:</p> <p>a. N/A</p> <p>b. N/A</p>

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 6 Section 1.2.C Page 7 Section 1.2.C.1 1.2.C.2 1.2.C.3	Page 10 Section 1.2.3	Page B.1-3 Section B.1.2.1.1	<p>Change:</p> <p>a. Revision 3 changed the title of "Vice President-Quality Assurance" to "Vice President Nuclear Quality Assurance".</p> <p>b. Revision 3 revised the description of the Vice President Nuclear Quality Assurance responsibilities and eliminated responsibility descriptions for subordinate positions.</p> <p>c. The Revision 3 changes and FPQAP Section 1.2.3 have been superseded by Section B.1.2.1.1.</p>	<p>Reason:</p> <p>a. To reflect current title.</p> <p>b. The Vice President's responsibilities were rephrased for clarity. Subordinate responsibilities were removed to reflect single-point accountability.</p> <p>c. Editorial. Nuclear Quality Assurance organizational responsibilities are described in Section B.1.2.1.1. Organizational responsibilities for the Fire Protection Program are described in the Unit Safety Analysis Reports which are referenced in Section B.1.2.1.1.</p>	<p>Basis:</p> <p>a. This change is administrative in nature. The responsibilities of the position have not changed.</p> <p>b. The revised responsibility description only reflects single-point accountability; it does not affect the functions or duties of subordinate positions.</p> <p>c. N/A</p>
N/A	Page 10 Section 1.2.4	Page B.1-3 Section B.1.2.1.1	<p>Change:</p> <p>a. Revision 3 added Vice President Nuclear Support responsibilities.</p> <p>b. The Revision 3 change and FPQAP Section 1.2.4 have been superseded by Section B.1.2.1.1.</p>	<p>Reason:</p> <p>a. To describe a revised Nuclear Division organizational structure.</p> <p>b. To reflect the elimination of the Nuclear Support organization.</p>	<p>Basis:</p> <p>a. The change in reporting structure does not affect the functions and duties of the affected groups.</p> <p>b. The change in reporting structure does not affect the functions and duties of the affected groups.</p>

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
N/A	Page 10 Section 1.2.5	Page B.18-2 Section B.18.2.3 B.18.2.12	Change: a. Revision 3 added Section 1.2.5 to describe Safety Review and Audit Board (SRAB) responsibilities.  b. The Revision 3 change and Section 1.2.4 have been superseded by Sections B.18.2.3 and B.18.2.12.	Reason: a. Editorial. To describe the responsibilities of the SRAB as they relate to Fire Protection QA Program elements.  b. Editorial. SRAB responsibilities are described in Section B.18.2.3 and identified in Section B.18.2.12.	Basis: a. N/A  b. N/A
Page 7 Section 1.2.D	Page 10 Section 1.2.7	Page B.1-4 Section B.1.2.1.2	Change: a. No change in Revision 3.  b. FPQAP Section 1.2.7 has been superseded by Section B.1.2.1.2. This section was added to describe overall corporate support responsibilities and provides a reference to Unit 1 UFSAR Section III.A.1 and Unit 2 USAR Section 13.1.1 for a further description.	Reason: a. N/A  b. Editorial. To consolidate the description of nonnuclear corporate support responsibilities into a separate section.	Basis: a. N/A  b. N/A



FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 8 Section 1.2.E	Page N/A Section 1.2	Page B.1-2 Section B.1.2.1.1	Change: a. Revision 3 removed the "Manager System Purchasing" position and responsibilities description.  b. The Revision 3 change has been superseded by Section B.1.2.1.1.	Reason: a. This position is a corporate position. Purchasing functions are now performed within the Nuclear Division.  b. Editorial. This change was previously identified in QATR, Revision 6, Section 1.2.2. Section B.1.2.1.1 has been revised to provide a reference to the Unit Safety Analysis Reports, which describe procurement responsibilities.	Basis: a. All QA Program responsibilities regarding procurement have been assumed by the Nuclear Division.  b. N/A
Page 8 Section 1.2.F	Page N/A Section 1.2	Page B.1-2 Section B.1.2.1.1	Change: a. Revision 3 removed the Program Director-Nuclear Materials Management position and responsibilities description.  b. The Revision 3 change has been superseded by Section B.1.2.1.1.	Reason: a. This position is a corporate position. Materials Management functions were combined with Purchasing functions which are now performed within the Nuclear Division.  b. Editorial. This change was previously identified in QATR, Revision 6, Section 1.2.2. Section B.1.2.1.1 has been revised to provide a reference to the Unit Safety Analysis Reports, which describe Materials Management responsibilities.	Basis: a. All QA Program responsibilities regarding Materials Management have been assumed by the Nuclear Division.  b. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 8 Section 1.2.G	Page 10 Section 1.2.6	Page B.1-4 Section B.1.2.1.2	Change: a. Revision 3 added the responsibilities of the Supervisor Standards Laboratory.  b. The Revision 3 change and Section 1.2.6 have been superseded by Section 1.2.1.2.	Reason: a. Editorial. To be consistent with the responsibilities described in the QATR.  b. Editorial. The responsibilities were previously described in the QATR. Section B.1.2.1.1 has been revised to provide a reference to the Unit Safety Analysis Reports which describes these responsibilities.	Basis: a. N/A  b. N/A
Page 8 Section 1.2.H	Page N/A Section 1.2	Page B.1-2 Section B.1.2.1.1	Change: a. Revision 3 removed Supervisors' responsibilities.  b. The Revision 3 change has been superseded by Section B.1.2.1.1.	Reason: a. To reflect only the main administrative structure of the fire protection program.  b. Editorial. Section B.1.2.1.1 has been revised to provide a reference to the Unit Safety Analysis Reports which describe Fire Protection Program responsibilities.	Basis: a. The revised responsibility description reflects single-point accountability; it does not affect the functions, duties, or responsibilities of supervisory positions.  b. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 9 Figure 1.1	Page 11 Figure 1.1	Table B-1	<p>Change:</p> <p>a. Revision 3 removed corporate Purchasing and Materials Management Departments, and revised FPQAP Section numbers.</p> <p>b. The Revision 3 changes a. ' Figure 1.1 have been superseded by revised Table B-1.</p>	<p>Reason:</p> <p>a. To reflect the transfer of Purchasing functions from corporate headquarters to the Nuclear Division.</p> <p>b. Editorial. Figure 1.1 has been incorporated into Table B-1. QATR Figure 1.1 was previously updated to reflect this change.</p>	<p>Basis:</p> <p>a. The Nuclear Division has assumed all QA Program responsibilities regarding Purchasing for the Fire Protection Program.</p> <p>b. Table B-1 depicts organizational responsibility for implementing the QA Program for fire protection. (See Enclosure B for Table B-1 changes.)</p>
Page 10 Section 2.1	Page 12 Section 2.1	Page B.2-1 Section B.2.1	<p>Change:</p> <p>a. Revision 3 deleted "uses a graded approach to apply appropriate criteria from 10CFR50, Appendix B to Fire Protection systems or activities" and added "applies the criteria from Branch Technical Position (BTP) 9.5-1.</p> <p>b. The Revision 3 change and the FPQAP Section 2.1 have been superseded by including Branch Technical Position (BTP) 9.5-1 in Section B.0, and referring to Unit 1 UFSAR Appendix 10A and Unit 2 USAR Appendix 9A in Sections B.2.1.</p>	<p>Reason:</p> <p>a. Editorial. To clarify that the QA Program for fire protection applies the criteria from Branch Technical Position (BTP) 9.5-1 to fire protection systems and activities.</p> <p>b. To include the QA Program description for fire protection as part of the overall plant QA Program description.</p>	<p>Basis:</p> <p>a. NMPC has applied, and continues to apply, the criteria from BTP 9.5-1 in the QA Program for fire protection.</p> <p>b. The QA Program elements for fire protection are not altered by combining the FPQAP with the QATR.</p>

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 10 Section 2.2	Page 12 Section 2.2	Page B.2-1 Section B.2.1	Change: a. Revision 3 removed the word "instructions" between "procedures" and "and".  b. The Revision 3 change and the FPQAP Section 2.2 have been superseded by combining Section 2.2 into Section B.2.1.	Reason: a. Editorial. "Instructions" are included in the definition of "other documents".  b. Editorial. The term "instructions" has been retained in Section B.2.1.	Basis: a. N/A  b. N/A
Page 10 Section 2.3	Page 12 Section 1.3	Table B-1	Change: a. Revision 3 moved Section 2.3 to Section 1.3 and updated document titles.  b. The Revision 3 change and FPQAP Section 2.3 have been superseded by incorporating Figure 1.1 into Table B-1.	Reason: a. Editorial.  b. Editorial.	Basis: a. N/A  b. N/A. (See Enclosure B for Table B-1 changes.)
Page 11 Section 3.1	Page 12 Section 3.1	Page B.3-4 Section B.3.2.15	Change: a. Section 3.1 has been renumbered B.3.2.15.	Reason: a. Editorial.	Basis: a. N/A
Page 11 Section 3.2	Page 13 Section 3.2 (Revised)	Page B.3-4 Section B.3.2.15	Change: a. Revision 3 added "Applicable work documents invoke design documents as necessary to ensure proper fabrication, inspection and testing".  b. The Revision 3 change and FPQAP Section 3.2 have been incorporated into Section B.3.2.15.	Reason: a. Editorial. To clarify the use of design documents as inputs to work documents.  b. Editorial.	Basis: a. N/A  b. N/A
Page 11 Section 3.3	Page 13 Section 3.3	Page B.3-4 Section B.3.2.15	Change: a. Section 3.3 was renumbered B.3.2.15.	Reason: a. Editorial.	Basis: a. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 11 Section 3.4	Page 13 Section 3.4	Page B.3-4 Section B.3.2.15	Change: a. Section 3.4 was renumbered B.3.2.15.	Reason: a. Editorial.	Basis: a. N/A
Page 11 Section 3.5	Page 13 Section 3.5 (Revised)	Page B.3-4 Section B.3.2.15	Change: a. Revision 3 deleted "under the direction and guidance of a Fire Protection Engineer (qualified) and Quality Assurance Personnel".  b. The Revision 3 change and FPQAP Section 3.5 have been incorporated into Section B.3.2.15.	Reason: a. Editorial. Implementing procedures dictate the review requirements and the level of design input required.  b. Editorial.	Basis: a. N/A  b. N/A
Page 12 Section 4.0	Page 13 Section 4.0 (Revised)	Page B.4-2 Section B.4.2.8 B.4.2.9 Page B.4-3 Section B.4.2.9	Change: a. Revision 3 rewrote Section 4.0. Added "such as Underwriters' Laboratories or Factory Mutual, will be procured with the required listing mark." Also added "Technical changes to procurement documents are processed in a manner commensurate with that used for the original."  b. The Revision 3 change and FPQAP Section 4.0 have been superseded by revised Sections B.4.2.8 and B.4.2.9.	Reason: a. Editorial. To clarify procurement document control.  b. Editorial.	Basis: a. N/A  b. N/A
Page 13 Section 5.0	Page 13 Section 5.0 (Revised)	Page B.5-1 Section B.5.2.5	Change: a. Revision 3 deleted "by personnel designated by the relevant document".  b. The Revision 3 change and FPQAP Section 5.0 have been incorporated into Section B.5.2.5.	Reason: a. Editorial. Specified in implementing procedures.  b. Editorial.	Basis: a. N/A  b. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 14 Section 6.1 6.2 6.3	Page 14 Section 6.0 (Revised)	Page B.7-3 Section B.7.2.10 Page B.7-4 Section B.7.2.10	<p>Change:</p> <p>a. Revision 3 provided a general rewrite of Section 6.0.</p> <p>b. Revision 3 deleted the requirement for Fire Protection Qualified Contractors List (FPQCL) and inserted language which served as the basis for the FPQCL.</p> <p>c. Revision 3 added "General use items not procured specifically for fire protection applications may be used in fire protection applications. This includes items such as standard hardware items and gaskets."</p> <p>d. The Revision 3 changes and FPQAP Section 6.0 have been incorporated into Section B.7.2.10.</p>	<p>Reason:</p> <p>a. Editorial.</p> <p>b. This allows a broader base of suppliers, while maintaining requirements for a listing mark (U.L. or F.M.) or another method of supplier qualification, or source surveillance.</p> <p>c. To clarify the use of certain standard items in fire protection systems.</p> <p>d. Editorial.</p>	<p>Basis:</p> <p>a. N/A</p> <p>b. The established controls continue to ensure that purchased material, equipment, and services conform to the procurement documents.</p> <p>c. Noncritical subcomponents can be verified operable based on established controls.</p> <p>d. N/A</p>
Page 15 Section 7.0	Page 14 Section 6.0 (Revised)	Pages B.7-3 and B.7-4 Section B.7.2.10	<p>Change:</p> <p>a. Revision 3 incorporated Section 7.0 "Material Control" into Section 6.0 "Control of Purchased Material, Equipment and Services."</p> <p>b. The Revision 3 change and FPQAP Section 6.0 have been incorporated into Section B.7.2.10.</p>	<p>Reason:</p> <p>a. Editorial. Consolidation of section.</p> <p>b. Editorial.</p>	<p>Basis:</p> <p>a. N/A</p> <p>b. N/A</p>

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 16 & 17 Section 8.1	Page 15 Section 7.1 (Revised)	Page B.10-3 Section B.10.2.10	Change: a. Revision 3 renumbered Section 8.0 to 7.0 "Inspection and Surveillance."  b. Revision 3 deleted general information and gave more details for scope of inspections, surveillances, and overcheck inspections.  c. The Revision 3 changes and FPQAP Section 7.1 have been incorporated into Section B.10.2.10.	Reason: a. Editorial.  b. Editorial. The general information is contained in implementing procedures.  c. Editorial.	Basis: a. N/A  b. N/A  c. N/A
Page 17 Section 8.2	Page 15 Section 7.2 (Revised)	Page B.10-2 Section B.10.2.8	Change: a. Revision 3 deleted "except as noted in Paragraph 8.1 above, relating to Preventative Maintenance and Operational Inspections/Tests."  b. The Revision 3 change and FPQAP Section 7.2 have been superseded by Section B.10.2.8.	Reason: a. Editorial. These exceptions are covered within specific implementing procedures for preventive maintenance.  b. Editorial. The independence of inspection personnel is described in Section B.10.2.8.	Basis: a. N/A  b. N/A
Page 17 Section 8.3	Page 15 Section 7.3 (Revised)	Page B.10-1 Section B.10.2.2	Change: a. Revision 3 moved Section 8.3 to Section 7.3 and revised section to include the term "surveillance" where applicable.  b. The Revision 3 changes and FPQAP Section 7.3 have been superseded by Section B.10.2.2.	Reason: a. Editorial.  b. Editorial.	Basis: a. N/A  b. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 17 Section 8.4	Page 16 Section 7.4 (Revised)	Page B.10-2 Section B.10.2.3	Change: a. Revision 3 deleted "Quality Assurance/Quality Control", and deleted "overcheck inspections and NDE", and added "inspection and or surveillance activities".  b. The Revision 3 change and FPQAP Section 7.4 have been incorporated in Section 10.2.3.	Reason: a. Editorial. Clarifies that "personnel" performing inspection and surveillance activities shall meet applicable qualifications.  b. Editorial.	Basis: a. N/A  b. N/A
Page 18 Figure 8.1	Deleted	Deleted	Change: a. Revision 3 deleted Figure 8.1.  b. FPQAP Figure 8.1 was omitted from UFSAR Appendix B.	Reason: a. Editorial. Inspection and surveillance responsibilities are specified by implementing procedure.  b. Editorial.	Basis: a. N/A  b. N/A
Page 19 Section 9.1	Page 16 Section 8.1 (Revised)	Page B.11-2 Section B.11.2.6	Change: a. Revision 3 renumbered Section 9.0 to 8.0 "Test and Control".  b. Revision 3 revised renumbered Section 8.1 by deleting "The program shall be verified through review, audit or surveillance, based on an evaluation of program details."  c. The Revision 3 change and FPQAP Section 8.1 have been incorporated into Section 11.2.6.	Reason: a. Editorial.  b. Editorial. QA performs audits and surveillance of all areas.  c. Editorial.	Basis: a. N/A  b. N/A  c. N/A



FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 19 Section 9.2	Page 16 Section 8.2	Page B.11-2 Section B.11.2.6	Change: a. Revision 3 renumbered Section 9.2 to 8.2.  b. The Revision 3 change and FPQAP Section 8.2 have been incorporated into Section B.11.2.6.	Reason: a. Editorial.  b. Editorial.	Basis: a. N/A  b. N/A
Page 20 Section 10.0	Page 16 Section 10.0 (Revised)	Page B.12-2 Section B.12.2.9	Change: a. Revision 3 revised first sentence from "Validity of measurements and test will be assured through the use of appropriate inspection," to read "Validity of inspection, surveillance and test results is assured through the use of appropriate measuring".  b. The Revision 3 change and FPQAP Section 10.0 have been incorporated into Section B.12.2.9.	Reason: a. Editorial.  b. Editorial.	Basis: a. N/A  b. N/A
Page 21 Section 11.0	Page 16 Section 9.0 (Revised)	Page B.14-1 Section B.14.2.7	Change: a. Revision 3 renumbered Section 11.0 to 9.0 "Inspection, Test and Operating Status".  b. Revision 3 changed "Measures shall" to "Measures are".  c. The Revision 3 change and FPQAP Section 9.0 have been incorporated into Section B.14.2.7.	Reason: a. Editorial. Consolidation of sections.  b. Editorial. Better wording for program level document.  c. Editorial.	Basis: a. N/A  b. N/A  c. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 22 Section 12.1	Page 17 Section 11.1 (Revised)	Page B.16-1 Section B.16.2.5	Change: a. Revision 3 renumbered Section 12.0 to 11.0 and changed heading to "Nonconforming Materials, Parts or Components/Corrective Action".  b. Revision 3 Section 11.1 was revised to provide a new general description.  c. Revision 3 Change "a" was superseded by Section B.15.0 and B.16.0. Revision 3 Change "b" and FPQAP Section 11.1 have been incorporated into Section B.16.2.5.	Reason: a. Editorial.  b. Editorial.  c. Editorial.	Basis: a. N/A  b. N/A  c. N/A
Page 22 Section 12.2	Page 17 Section 11.2 (Revised)	Page B.15-2 Section B.15.2.15 Page B.16-1 Section B.16.2.2	Change: a. Revision 3 renumbered Section 12.2 to 11.2 and combined former Sections 12.1 and 12.2.  b. Revision 3 added "and to assure that corrective actions are taken" to Section 11.2.  c. Revision 3 Change "a" and Section 11.2 have been incorporated into Section B.15.2.15. Revision 3 Change "b" has been superseded by Section B.16.0.	Reason: a. Editorial.  b. Editorial. To incorporate Section 13.0 of Revision 2.  c. Editorial.	Basis: a. N/A  b. N/A  c. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 22 Section 12.3	Page 17 Section 11.3 (Revised)	Page B.16-1 Section B.16.2.5	Change: a. Revision 3 renumbered Section 12.3 to 11.3 and changed "Documentation shall identify the nonconforming item, describe the nonconformance and record the disposition" to "Documentation describes the condition adverse to fire protection, the nonconforming item, and records the corrective action taken."  b. The Revision 3 change and FPQAP Section 11.3 have been incorporated into Section B.16.2.5.	Reason: a. Editorial. To incorporate Section 13.0 of Revision 2.  b. Editorial.	Basis: a. N/A  b. N/A
Page 23 Section 13.0	Page 17 Section 11.0 (Revised)	Page B.16-1 Section B.16.2.2	Change: a. Revision 3 incorporated Section 13.0 "Corrective Action" into Section 11.0 "Nonconforming Materials, Parts or Components/Corrective Action".  b. The Revision 3 change and FPQAP Section 11.0 have been superseded by Section B.16.2.5.	Reason: a. Editorial.  b. Editorial.	Basis: a. N/A  b. N/A
Page 24 Section 14.1	Page 17 Section 12.1 (Revised)	Page B.17-1 Section B.17.2.2	Change: a. Revision 3 renumbered Section 14.1 to 12.1, "Records".  b. Revision 3 changed "shall" to "are".  c. The Revision 3 changes and FPQAP Section 12.1 have been superseded by Section B.17.2.2.	Reason: a. Editorial.  b. Editorial.  c. Editorial.	Basis: a. N/A  b. N/A  c. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 24 Section 14.2	Page 17 Section 12.2 (Revised)	Page B.17-1 Section B.17.2.2 B.17.2.3	Change: a. Revision 3 renumbered Section 14.2 to 12.2 "Records Control".  b. Revision 3 replaced "nonconformance and corrective action reports" with "Deviation/Event Reports".  c. The Revision 3 changes and FPQAP Section 12.2 have been superseded by Sections B.17.2.2 and B.17.2.3.	Reason: a. Editorial.  b. Deviation/Event Reports have replaced nonconformance and corrective action reports. The change reflects Deviation/Event Reports as controlled records.  c. Editorial. The Deviation/Event Report process was previously identified in the QATR.	Basis: a. N/A  b. Deviation/Event Reports are identifiable and retrievable.  c. N/A
Page 24 Section 14.3	Page 17 Section 12.3 (Revised)	Page B.17-2 Section B.17.2.3	Change: a. Revision 3 renumbered Section 14.3 to 12.3 "Record Retention".  b. The Revision 3 change and FPQAP Section 12.3 have been superseded by Section B.17.2.3.	Reason: a. Editorial.  b. Editorial.	Basis: a. N/A  b. N/A

FPQAP REV. 2 PAGE/SECTION	FPQAP REV. 3 PAGE/SECTION	NEW UFSAR APP. B PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 25 Section 15.1	Page 18 Section 13.1 (Revised)	Page B.18-2 Section B.18.2.12	<p>Change:</p> <ul style="list-style-type: none"> <li>a. Revision 3 renumbered Section 15.0 to 13.0 and revised title from "Audit" to "QA Audit Program".</li> <li>b. Revision 3 renumbered Section 15.1 to 13.1 and changed wording from "Audits shall be conducted" to "QA Audits are conducted".</li> <li>c. Revision 3 Change "a" has been superseded by Section B.18. Revision 3 Change "b" and FPQAP Section 13.1 have been incorporated into Section B.18.2.12.</li> </ul>	<p>Reason:</p> <ul style="list-style-type: none"> <li>a. Editorial.</li> <li>b. Editorial.</li> <li>c. Editorial.</li> </ul>	<p>Basis:</p> <ul style="list-style-type: none"> <li>a. N/A</li> <li>b. N/A</li> <li>c. N/A</li> </ul>
Page 25 Section 15.2	Page 18 Section 13.2 (Revised)	Page B.18-2 Section B.18.2.12 Page B.18-3 Section B.18.2.12	<p>Change:</p> <ul style="list-style-type: none"> <li>a. Revision 3 renumbered Section 15.2 to 13.2 and deleted the first paragraph of 15.2 that included three bullets showing audit program frequencies.</li> <li>b. Revision 3 added "Fire Protection Program Audits are performed per the requirements of the applicable Technical Specifications: Unit-1 6.5.3.8.g, 6.13.1, and 6.13.2 and Unit-2 6.5.3.8.k, 6.5.3.8.l, and 6.5.3.8.m".</li> <li>c. Revision 3 incorporated footnote regarding NRC Generic Letter 82-21 into renumbered Section 13.2.</li> <li>d. The Revision 3 changes and FPQAP Section 13.2 have been incorporated into Section B.18.2.12.</li> </ul>	<p>Reason:</p> <ul style="list-style-type: none"> <li>a. Editorial.</li> <li>b. Editorial.</li> <li>c. Editorial.</li> <li>d. Editorial.</li> </ul>	<p>Basis:</p> <ul style="list-style-type: none"> <li>a. N/A</li> <li>b. N/A</li> <li>c. N/A</li> <li>d. N/A</li> </ul>

ENCLOSURE C - INCORPORATION OF THE FPQAP INTO THE NMPC-QATR-1 (UFSAR APPENDIX B)

FPQAP REV. 2 PAGE/SECTION	FPQAP REV. 3 PAGE/SECTION	NEW UFSAR APP. B PAGE/SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 25 Section 15.3	Page 18 Section 13.3 (Revised)	Page B.18-3 Section B.18.2.12	Change: a. Revision 3 renumbered Section 15.3 to 13.3 "Audit Results" and added "and the Safety Review and Audit Board (SRAB)". b. The Revision 3 change and FPQAP Section 13.3 have been incorporated into Section B.18.2.12.	Reason: a. Editorial. b. Editorial.	Basis: a. N/A b. N/A
Page 26 Attachment 1	Page 9 Section 1.1	Page B.2-1 Section B.2.1	Change: a. Revision 3 revised Section 1.1 to further expand the Fire Protection Program description and deleted Attachment 1, which contained redundant information. b. The Revision 3 change and Section 1.1 have been superseded by Section B.2.1. Section B.2.1 was revised to include a reference to the Unit 1 UFSAR Appendix 10A and Unit 2 USAR Appendix 9A.	Reason: a. Editorial. Incorporated into Section 1.1. b. Editorial. The scope of the Fire Protection Program is described in Unit 1 UFSAR Appendix 10A and Unit 2 USAR Appendix 9A.	Basis: a. N/A b. N/A
Page 27 Attachment 2	Deleted	Deleted	Change: a. Revision 3 deleted Attachment 2. b. FPQAP Attachment 2 was omitted from UFSAR Appendix B.	Reason: a. Revision 3, Section 6.0, was revised to delete the FPQCL and incorporated the root requirements for the list. b. Editorial.	Basis: a. The established controls continue to ensure that purchased material, equipment, and services conform to the procurement documents. b. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 25 Section 15.1	Page 18 Section 13.1 (Revised)	Page B.18-2 Section B.18.2.12	Change: a. Revision 3 renumbered Section 15.0 to 13.0 and revised title from "Audit" to "QA Audit Program".  b. Revision 3 renumbered Section 15.1 to 13.1 and changed wording from "Audits shall be conducted" to "QA Audits are conducted".  c. Revision 3 Change "a" has been superseded by Section B.18. Revision 3 Change "b" and FPQAP Section 13.1 have been incorporated into Section B.18.2.12.	Reason: a. Editorial.  b. Editorial.  c. Editorial.	Basis: a. N/A  b. N/A  c. N/A
Page 25 Section 15.2	Page 18 Section 13.2 (Revised)	Page B.18-2 Section B.18.2.12 Page B.18-3 Section B.18.2.12	Change: a. Revision 3 renumbered Section 15.2 to 13.2 and deleted the first paragraph of 15.2 that included three bullets showing audit program frequencies.  b. Revision 3 added "Fire Protection Program Audits are performed per the requirements of the applicable Technical Specifications: Unit-1 6.5.3.8.g, 6.13.1, and 6.13.2 and Unit-2 6.5.3.8.k, 6.5.3.8.l, and 6.5.3.8.m".  c. Revision 3 incorporated footnote regarding NRC Generic Letter 82-21 into renumbered Section 13.2.  d. The Revision 3 change and FPQAP Section 13.2 have been incorporated into Section B.18.2.12.	Reason: a. Editorial.  b. Editorial.  c. Editorial.  d. Editorial.	Basis: a. N/A  b. N/A  c. N/A  d. N/A

FPQAP REV. 2 PAGE/ SECTION	FPQAP REV. 3 PAGE/ SECTION	NEW UFSAR APP. B PAGE/ SECTION	IDENTIFICATION OF CHANGE	REASON FOR CHANGE	BASIS FOR CONCLUDING THAT THE REVISED PROGRAM CONTINUES TO SATISFY BTP 9.5-1 AND COMMITMENTS PREVIOUSLY APPROVED BY THE NRC
Page 25 Section 15.3	Page 18 Section 13.3 (Revised)	Page B.18-3 Section B.18.2.12	Change: a. Revision 3 renumbered Section 15.3 to 13.3 "Audit Results" and added "and the Safety Review and Audit Board (SRAB)".  b. The Revision 3 change and FPQAP Section 13.3 have been incorporated into Section B.18.2.12.	Reason: a. Editorial.  b. Editorial.	Basis: a. N/A  b. N/A
Page 26 Attachment 1	Page 9 Section 1.1	Page B.2-1 Section B.2.1	Change: a. Revision 3 revised Section 1.1 to further expand the Fire Protection Program description and deleted Attachment 1, which contained redundant information.  b. The Revision 3 change and Section 1.1 have been superseded by Section B.2.1. Section B.2.1 was revised to include a reference to the Unit 1 UFSAR Appendix 10A and Unit 2 USAR Appendix 9A.	Reason: a. Editorial. Incorporated into Section 1.1.  b. Editorial. The scope of the Fire Protection Program is described in Unit 1 UFSAR Appendix 10A and Unit 2 USAR Appendix 9A.	Basis: a. N/A  b. N/A
Page 27 Attachment 2	Deleted	Deleted	Change: a. Revision 3 deleted Attachment 2.  b. FPQAP Attachment 2 was omitted from UFSAR Appendix B.	Reason: a. Revision 3, Section 6.0, was revised to delete the FPQCL and incorporated the root requirements for the list.  b. Editorial.	Basis: a. The established controls continue to ensure that purchased material, equipment, and services conform to the procurement documents.  b. N/A