



Northern States Power Company

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10 CFR Part 50  
Section 50.54(a)

August 3, 1993

U S Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT  
Docket No 50-263 License No DPR-22

PRAIRIE ISLAND NUCLEAR GENERATING PLANT  
Docket Nos 50-282 License Nos DPR-42  
50-306 DPR-60

Submittal of Changes to Revision No 16 of the  
Operational Quality Assurance Plan (OQAP)

Pursuant to 10 CFR Part 50, Section 50.54(a), we are submitting a copy of Changes to Revision 16 to the Northern States Power Company Operational Quality Assurance Plan (OQAP).

Changes to Revision 16 to the NSP Operational Quality Assurance Plan was internally reviewed and approved July 16, 1993. We have concluded that this revision does reduce the commitments of NSP's Operational Quality Assurance Program. This change does not adversely impact safe operation of the nuclear power plants. Specific changes with the reason for the change and basis for concluding that the changes satisfy the criteria of 10 CFR 50, Appendix B and the USAR are presented in the attachment. These changes to Revision 16 will not be implemented until Region III has reviewed and approved the changes.

Any questions concerning this document should be addressed to Paul Kamman, Manager Nuclear Operations Quality Assurance at (612) 337-2211.

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This document does not contain any new NRC commitments.



Roger O Anderson

Director

Licensing and Management Issues

c:   Regional Administrator - Region III,, NRC  
      Senior Resident Inspector - Monticello, NRC  
      Senior Resident Inspector - Prairie Island, NRC  
      NRR Project Manager - Monticello, NRC  
      NRR Project Manager - Prairie Island, NRC  
      Chief of Operational Programs Section - Region III, NRC

Attachment: Changes to Revision 16 of the  
              NSP Operational Quality Assurance Plan (OQAP)

**Review and Approval**  
**Reduction in Commitment to the OQAP - 50.54(a)(3)**

Description of 50.54(a)(3) submittal:

Changes to revision 16 of the OQAP to remove the requirements for in-line reviews by QA personnel for documents for which they have no direct responsibility.

Prepared By: John Mestel Date: 6.23.93

Reviewed By: V.R. Benson Date: 6/23/93

Approved By: Paul Kimm Date: 6/30/93  
Manager NOQA

Approved By: David Mendele Date: 7/1/93  
Director Quality Assurance

Initials

Instructions (following review and approvals):

1. Deliver the 50.54(a)(3) to Licensing for submittal to Region III NRC.

JH 7/16/93  
Mgr NOQA

2. Create a RMS file: RMS 1.3  
Reduction in Commitments

\_\_\_\_\_  
Admin

3. File this review and approval document and a copy of the 50.54(a)(3) submittal in the RMS file.

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Admin

4. When received, include documentation of NRC response to the 50.54(a)(3) in the RMS file.

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Admin

NORTHERN STATES POWER COMPANY  
PROPOSED CHANGE TO OPERATIONAL QUALITY ASSURANCE (Rev. 16) PLAN

Pursuant to 10 CFR Part 50, Section 50.54(a)(3), Northern States Power Company proposes the following changes to the Operational Quality Assurance Plan.

Proposed Changes:

The proposed change is to remove the Quality Assurance organization (QA) from responsibility for in-line reviews of documents for which they have no direct responsibility. In support of this change, the terminology used to describe the required reviews is standardized, and the requirements for the individual/group responsible for verifying conformance to program requirements is revised to be consistent with ANSI N18.7-1976 and ANSI N45.2-1971. An alternate to the requirement for Power Supply Quality Assurance review of various documents is shown in Attachment (1).

Reason for Change:

QA currently performs reviews of procurement documents, modification/project packages, administrative control directives (ACD) and administrative work instructions (AWI), and fire protection reviews for non-site procurements. Except for corporate ACDs and AWIs, QA has no direct responsibility for these documents.

These reviews performed by QA are variously described in the OQAP as "quality" reviews or as "quality assurance" reviews. These "quality" reviews have come to mean exclusively a review by someone from a formal quality assurance organization. NSP desires to clarify that these required reviews are not the sole responsibility of QA and as such, QA does not necessarily need to be in the review cycle.

In order to further clarify this position, the wording in the OQAP, section 3.1-3 and Appendix C, section 2.1-3, would be changed to wording reflective of ANSI N18.7-1976, section 3.2, paragraph 5, and ANSI N45.2-1971, section 3, paragraph 4, that is:

"...the individual or group assigned the responsibility for checking, inspecting, or otherwise verifying that an activity has been correctly performed is qualified and does not have responsibility for performing or directly supervising the work."

Basis for Concluding the Change Satisfies the Criteria of 10CFR50 Appendix B and the USAR

10 CFR Part 50, Appendix B, Criterion VI, requires that documents affecting quality and revisions thereto be reviewed for adequacy. Appendix B, Criterion VI, does not specify the group or individual responsible for these reviews. Appendix B, Criterion I, provides direction as to the necessary characteristics for persons and organizations performing quality assurance functions in that

NORTHERN STATES POWER COMPANY  
PROPOSED CHANGE TO OPERATIONAL QUALITY ASSURANCE (Rev. 16) PLAN

Criterion I states that the organizational structure for executing the quality assurance program may take various forms provided that the persons and organizations performing quality assurance functions have the necessary required authority and organizational freedom. Neither Criteria specifies that a QA organization or any other specific group or individual shall be responsible for reviews.

Both ANSI N18.7-1976 and ANSI N45.2-1971 make a point of clarifying that quality assurance should be recognized as an interdisciplinary function involving many organizational components and, therefore, should not be regarded as the sole domain of a single quality assurance group. Both standards go on to give examples of how it may be more appropriate for groups other than QA personnel, nuclear engineers or design engineers for example, to perform reviews in their areas of expertise because of the special competence required to perform these reviews.

The proposed changes meet the Appendix B requirements, are consistent with the ANSI standards requirements referenced above and do not represent a significant reduction in current commitments and do not impact any analysis or conclusions presented in the Update Safety Analysis Report for either facility.

Additionally, Northern States Power has current programs, the audit and QA surveillance programs, to provide assurance that the review requirements are effectively implemented. Personnel in the surveillance program are stationed at the nuclear sites.

Northern States Power will maintain in the OQAP the existing review criteria for ACDs (sections 4.4-1 and 8.2-1), AWIs (sections 4.5-1 and 8.3-1) and procurement documents (section 9.2-1). Responsibility for these reviews will be documented in the corporate ACDs, as will the responsibility for modification/project reviews. The audit function will remain organizationally independent of individuals or groups performing the work. The responsibility for the review of fire protection related procurement documents from non-site departments will be assumed by the Plant Manager.

Attachment (1)

Proposed Changes Marked Up  
On Existing Operational Quality Assurance Plan (Rev. 16) Pages

Attachment (1) consists of existing Operational Quality Assurance Plan pages with the proposed changes highlighted on those pages. The existing sections and pages affected by this proposed change are listed below:

<u>Page(s)</u>	<u>Section</u>
7	3.1-3
9	3.3.2.1.1
10	3.3.2.1.3
12-13	3.3.2.2.1.2
26-27	4.7-4
34	8.2-1
34	8.3-1
56	17.5-1
77	App. C, 2.1-3
77-79	App. C, 2.2-1 & 2.2-3
91	App. C, 9.4

### 3.0 Organization

#### 3.1 General Requirements

1. NSP shall be responsible for the establishment and execution of the Operational Quality Assurance Program. NSP may delegate to other organizations the work of establishing and executing the Operational Quality Assurance Program, or any part thereof, but shall retain responsibility therefor.
2. The authority and duties of persons and organizations performing quality assurance functions shall be clearly established and delineated in writing. Such persons and organizations shall have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementation of solutions.
3. Assurance of quality requires management measures which provide that the individual or group assigned the responsibility for checking, auditing, inspecting, or otherwise verifying that an activity has been correctly performed is ~~independent of the individual or group directly responsible for performing the specific activity.~~ qualified and does not have responsibility for performing or directly supervising the work except that:
  - a. The individual or group assigned the responsibility for auditing is independent of the individual or group directly responsible for performing the specific activity.

#### 3.2 Quality Organization Summary

1. The Power Supply Quality Assurance Department is responsible for the overall administration of the Operational Quality Assurance Program. Specific responsibilities are stated in Section 3.3.2.1 and its subsections.
2. The Quality Services Section for each nuclear site is responsible for the administration of the site quality assurance program and quality control of site activities. Specific responsibilities are stated in Section 3.3.2.2.1.2.
3. The Materials & Special Processes Section of the Production Plant Maintenance Department is responsible for providing technical support for the quality control of special processes at the nuclear plants. Specific responsibilities are stated in Section 3.3.2.3.2.1.



2. Stop work authority for nonconforming activities until the adverse conditions have been corrected.
3. Assisting other company organizations in implementing quality assurance program requirements.
4. Providing Power Supply Quality Assurance status reports to appropriate levels of management.

Positions reporting to this Director include: Superintendent Supplier Quality Assurance, Manager Nuclear Operations Quality Assurance and Superintendent Site Quality Assurance (Monticello and Prairie Island).

#### 3.3.2.1.1 Superintendent Supplier Quality Assurance

This position is responsible for control of the supplier qualification program. Responsibilities include:

1. Inspections of nuclear fuel suppliers.
2. Quality assurance audits/source surveillances and qualification of suppliers of materials, equipment and services.
- ~~3. Quality assurance reviews of nuclear procurement made by general office organizations.~~
3. ~~4~~ Preparation/review of internal quality assurance programs and procedures.

#### 3.3.2.1.2 Manager Nuclear Operations Quality Assurance

This position is responsible for quality assurance activities associated with general office organizations and internal auditing. Responsibilities include:

1. Internal audits of all levels of the Operational Quality Assurance Program.
2. Review of Corporate Nuclear Administrative Control Directives and Corporate Nuclear Administrative Work Instructions.
3. Maintenance of Corporate Nuclear Administrative Control Directives and Corporate Nuclear Administrative Work



Instructions current with corporate commitments and policies.

4. Program implementation monitoring and periodic trending.

3.3.2.1.3 Superintendent Site Quality Assurance  
(Monticello and Prairie Island)

These positions are responsible for the administration of Site Power Supply Quality Assurance activities. Responsibilities include:

1. Implementation of site surveillance program.
2. ~~Quality Assurance review of site procurement documents.~~
3. ~~Quality Assurance review of modifications & projects.~~
2. 4. Maintaining and reporting the status of on-site Quality Assurance Program implementation.

3.3.2.2 Vice President Nuclear Generation

This position is responsible for the operation and physical control of the company's nuclear generating facilities. Responsibilities include:

1. Operation of nuclear facilities.
2. Maintenance of nuclear facilities.
3. Modification of nuclear facilities.
4. Nuclear facility fuel utilization.
5. Operational review of new nuclear facility design.
6. Independent review and audit of nuclear plant operations and operating license administration.
7. Training Support for all Power Supply personnel.
8. Providing overall direction and support to nuclear site management in matters of staffing and employee qualifications.

Positions reporting to these General Managers respectively include: Plant Manager, Manager Nuclear Projects, Superintendent Quality Services.

3.3.2.2.1.1 Monticello and Prairie Island Plant Managers

These positions are responsible for ensuring that activities and operations comply with applicable regulatory requirements. Responsibilities include:

1. Responsibilities assigned by the operating license and the Corporate Nuclear Administrative Control Directives.
2. Plant managerial control system.
3. Plant operation and maintenance.
4. Plant staffing, including qualifications, hiring, training, discipline, and administration of the labor contracts.
5. Development and implementation of the following programs:
  - a. Preventive maintenance.
  - b. Surveillance.
  - c. Operating, maintenance, and testing procedural systems.
  - d. Fire protection.
  - e. Operating experience assessment.
6. Coordination of activities performed by non-plant staff personnel with plant operation.
7. Operation and maintenance of the independent spent fuel storage installation (Prairie Island only).

3.3.2.2.1.2 Superintendent Quality Services (Monticello and Prairie Island)

These positions are responsible for the administration of Operational Quality Assurance Program requirements at the site level. Responsibilities include:

1. Implementation of the site quality control inspection program (except ISI).
2. Review of inspection schedules (except ISI), procedures, and results (i.e., those associated with routine maintenance and modification activities, operational activities, technical services, radioactive material packages, emergency equipment, and fire protection).
3. Requesting audits of selected site level activities when determined that the audit will improve site program implementation.
- ~~4. Review of site Administrative Control Directives and Instructions.~~
4. ~~5.~~ Site program implementation monitoring and periodic trending.
5. ~~6.~~ Stop work authority for nonconforming activities at the site until adverse conditions have been corrected.
6. ~~7.~~ Providing site quality assurance status and trend reports to appropriate levels of management.
7. ~~8.~~ Monitoring contractor quality control activities.

#### 3.3.2.2.1.3 Manager Nuclear Projects (Monticello and Prairie Island)

These positions are responsible for the execution of projects assigned to Nuclear Projects and for providing craft labor when requested. Responsibilities include:

1. Design, manufacture, fabrication, construction, installation, and preoperational testing of modification projects.
2. Implementation of assigned on-going projects at nuclear plants.
3. Providing technical support.
4. Performing assigned responsibilities for maintenance activities.
5. Providing craft labor.

#### 4.5 Administrative Work Instructions

1. Administrative Work Instructions (Instructions) shall be documents which provide guidelines or instructions for the implementation of the requirements of Administrative Control Directives. Instructions shall be second tier implementing documents and shall receive a quality review prior to issuance. The quality review shall assure compliance with pertinent Directive requirements and assigned responsibilities.
2. Administrative Work Instructions may be issued at the Corporate and Site level. Instructions shall generally be utilized for department interfacing. Required Instructions shall be controlled and reviewed periodically.

#### 4.6 Procedures

1. Procedures shall be documents which provide specific instructions for performing an activity. Procedures shall be second or third tier documents utilized to perform safety related, fire protection, and 10CFR71 related activities as required by the applicable NRC Operating License Technical Specifications.
2. Procedures shall be provided where applicable, to assure that activities important to safety are performed in the required manner. Required procedures shall be reviewed and approved as required by the applicable Technical Specifications. Approval of procedures not required by the Technical Specifications shall be by a member of the responsible area management. Review of procedures not required by Technical Specifications shall be by an independent knowledgeable person. Required procedures shall be controlled and reviewed periodically.

#### 4.7 Program Administration

1. Administration of the Corporate level of the Operational Quality Assurance Program shall be performed by the Director Power Supply Quality Assurance.
2. Administration of the site level of the Program shall be performed by the Superintendent Quality Services except in the areas of procurement and modification which shall be performed by the Director Power Supply Quality Assurance.

3. Disputes between Quality Assurance personnel and other organizations relative to Program requirements shall be referred to the Approving Authority (as identified in Section 4.2 of this Plan) responsible for establishing the pertinent requirement.
4. Program administration shall include the following activities:
  - a. ~~Quality~~ Review of Corporate Administrative Control Directives.
  - b. ~~Quality~~ Review of Corporate Administrative Work Instructions.
  - ~~c. Procurement review.~~
  - c. ~~d.~~ Performance of required audits.
  - d. ~~e.~~ Reporting to management concerning:
    1. Program status.
    2. Program discrepancies including quality trends.

#### 4.8 Program Boundary

1. The structure, systems, components, and other items requiring quality assurance are listed in Appendices A and B. The Program shall also include shipment of radioactive materials as required by 10CFR71 and systems and activities associated with fire protection as identified in Appendix C.
2. An index shall be established and maintained by the Director Power Supply Quality Assurance which identifies the Directives and Instructions that are utilized to implement the requirements of ANSI N18.7-1976 that are committed to in Section 1.0 of this plan and the requirements identified in the remaining sections of this plan.

#### 4.9 Quality Assurance Training

Training programs shall be established for those personnel performing quality-affecting activities such that they are knowledgeable in the quality assurance documents and their requirements and proficient in implementing these requirements. These training programs shall assure that:

1. Personnel responsible for performing quality-affecting activities are instructed as to the purpose, scope, and implementation of the

## 8.0 Document Control

### 8.1 General Requirements

1. Measures shall be established to control the issuance of documents, such as Directives, Instructions, Procedures, and drawings, including changes thereto, which prescribe activities affecting quality.
2. These measures shall assure that documents, including changes, are:
  - a. Reviewed for adequacy and approved for release by authorized personnel, and
  - b. Are distributed to and used at the location where the prescribed activity is performed.
3. Changes to documents shall be reviewed and approved by the same organization that performed the original review and approval or another designated responsible organization.

### 8.2 Administrative Control Directive Control

1. Directives issued to implement the Operational Quality Assurance Program shall be controlled to assure that current copies and appropriate indexes are made available to personnel performing the prescribed activities. Directives shall be reviewed ~~by quality assurance personnel~~ to assure their compatibility with the Operational Quality Assurance Program objectives and shall be approved by the designated management.
2. Changes to Directives shall be reviewed and approved in the same manner as the original.

### 8.3 Administrative Work Instruction Control

1. Instructions issued to implement provisions of Directives shall be controlled to assure that current copies and appropriate indexes are made available to personnel performing the prescribed activities. Instructions shall be reviewed ~~by quality assurance personnel~~ to assure that they are compatible with pertinent Directive provisions and shall be approved by designated management.
2. Changes to Instructions shall be reviewed and approved in the same manner as the original.



## 9.0 Control of Purchased Material, Equipment and Services

### 9.1 General Requirements

1. Measures shall be established to assure that purchased material, equipment and services conform to the procurement documents. These measures shall include provisions, as appropriate, for vendor evaluation and selection, objective evidence of quality furnished by the vendor, inspection at the vendor source, and examination of products upon delivery.
2. Documentary evidence that material and equipment conform to the procurement requirements shall be available at the site prior to installation or use of such material and equipment. This documentary evidence shall be retained at the site and shall be sufficient to indicate that the purchased material and equipment meet the specific requirements of the codes, standards, or specifications.
3. The effectiveness of the control of quality by vendors shall be assessed at intervals consistent with the importance, complexity and quantity of the product or service.

### 9.2 ~~Quality Review~~ Procurement Review

1. Documents initiating procurement of safety related, fire protection related, and 10CFR71 related material, equipment and services shall be subject to a ~~quality~~ review to ensure applicable regulatory requirements, design bases, quality assurance, and other requirements are adequately satisfied.
2. Quality assurance requirements shall include identification of applicable elements of ANSI N45.2- 1971 (or equivalent) that are required to be included in the vendor's quality assurance program.

### 9.3 Vendor Evaluation and Verification

1. The adequacy of vendor's quality assurance program specified in procurement documentation shall be verified prior to use of the procured material, equipment, or service. Vendor's adherence to their quality assurance program to the extent appropriate for the procured material, equipment or service shall be verified.
2. Vendor evaluations shall include inspections, audits, or surveillances as appropriate. These activities shall be planned and performed in



2. The acceptability of such rework or repair of materials, parts, components, systems, and structures shall be verified by reinspection and retesting the item as originally inspected and tested or by a method which is equivalent to the original inspection and testing method. Inspection, testing, rework, and repair procedures shall be documented.
3. Normally, nonconforming safety related and fire protection related items shall not be installed prior to satisfactory resolution of outstanding discrepancies. In exceptional cases nonconforming items may be installed provided specific action is taken, which assures the item is not utilized to fulfill a safety function, prior to resolution of the discrepancy.

#### 17.5 Nonconformance Documentation

1. Nonconformance reports shall be initiated for significant deviations from specified requirements. Such reports shall identify the nonconforming item, describe the nonconformance, the disposition of the nonconformance, and the inspection requirements. Nonconformances shall be reviewed and approved. ~~by appropriate quality personnel.~~
2. Nonconformance reports shall be periodically analyzed to show quality trends and the results of this review shall be reported to the appropriate level of management for review and assessment.

#### 17.6 Reporting

Measures shall be established which assure that defects as defined in 10CFR21 and failures to comply with the Atomic Energy Act of 1954, as amended, or any applicable rule, regulation, order or license of the NRC relating to a substantial safety hazard are reported in accordance with the applicable requirements of 10CFR21.

## APPENDIX C

### Nuclear Plant Fire Protection Program

#### 1.0 Policy Statement

Northern States Power Company (NSP) has established a system of Administrative Control Directives (ACDs) that implement the Operational Quality Assurance Plan. This system shall be used to implement the requirements of the operating nuclear power plant fire protection program. The basic requirements of the fire protection program are specified in this appendix to the Operational Quality Assurance Plan.

#### 2.0 Organization

##### 2.1 General Requirements

1. NSP shall be responsible for the establishment and implementation of the fire protection program. NSP may delegate to other organizations the work of establishing and implementing the fire protection program, or any part thereof, but shall retain responsibility for the program.
2. The authority and duties of persons and organizations involved in the fire protection program shall be clearly established and delineated in writing.
3. To assure adherence to the fire protection program, management measures shall be established which provide that the individual or group assigned the responsibility for checking, auditing, inspecting, or otherwise verifying that an activity has been correctly performed is ~~independent of the individual or group directly responsible for performing the specific activity.~~ qualified and does not have responsibility for performing or directly supervising the work-except that:
  - a. The individual or group assigned the responsibility for auditing is independent of the individual or group directly responsible for performing the specific activity.

##### 2.2 Fire Protection Organization Summary

The NSP organization is summarized in Section 3.0 of the Operational Quality Assurance Plan. In addition to that summary, the following additional responsibilities shall pertain to the fire protection program.

1. Director Power Supply Quality Assurance
  - a. Scheduling and assuring completion of independent off-site fire protection inspections and audits.

~~b. Reviewing non-site purchase requisitions related to fire protection.~~

2. General Manager Nuclear Site (Monticello and Prairie Island)
  - a. Procurement of equipment for the fire brigades.
  - b. Establishing a policy for the security actions to be taken by the guard force during a fire.
3. Monticello and Prairie Island Plant Managers
  - a. Routine inspection of the plant for fire hazards.
  - b. Establishing plant fire brigades.
  - c. Ensuring that fire brigade members receive required training and physical evaluations.
  - d. Coordinating fire drills and determining their effectiveness.
  - e. Establishing cooperation with the local fire department, including joint drills and training sessions to familiarize fire department personnel with plant access routes, layout, equipment, and special hazards.
  - f. Establishing storage requirements to insure no additional fire hazards are created.
  - g. Establishing a surveillance program for fire protection systems and fire fighting equipment.
  - h. Establishing a system to control nonconforming items.
  - i. Reviewing required work processes for fire hazards and possible reduction of fire protection system effectiveness.
  - j. Reviewing modifications to determine if they would cause an unreviewed fire hazard or reduce the effectiveness of the fire protection systems.
  - k. Establishing a fire salvage program (when required).

1. Reviewing purchase requisitions ~~initiated by the plant and Nuclear Projects Department~~ that are related to fire protection.
- m. Developing instructions for fighting fires in specific areas and identifying effects of fires in specific areas.
- n. Preparing news release information for NSP's Communications Department.
4. Manager Power Supply Training - Nuclear (Monticello and Prairie Island)
  - a. Establishing a training program for the fire brigades.

### 2.3 Fire Protection Engineer

1. A fire protection engineer (or engineering consultant) shall be used to provide the following types of services:
  - a. Review of design for a significant modification to a fire protection system.
  - b. Review of proposed plant modifications which would introduce major hazards not analyzed in the Fire Hazards Analysis.
  - c. Triennial independent fire protection inspections (see Section 14.2).
2. The fire protection engineer (or engineering consultant) shall meet the following qualifications:
  - a. A graduate of an engineering curriculum of accepted standing who has completed not less than six years of engineering attainment indicative of growth in engineering competency and achievement, three of which shall have been in responsible charge of fire protection engineering work, or
  - b. A member in the Society of Fire Protection Engineers.

### 3.0 Nuclear Plant Fire Brigades

#### 3.1 Monticello

1. A fire brigade shall be established in accordance with the requirements of 10CFR50, Appendix R, Section III.H, and the requirements listed below:

- b. The item has a satisfactory performance history, and
- c. Appropriate receipt inspection is identified in the procurement documents, then an evaluation is unnecessary. The fact that the supplier and item meets these requirements shall be documented in the procurement files.

9.3 Parts of components and equipment that have UL or FM approval as a unit shall be procured as follows:

- 1. The part shall be manufactured by the original manufacturer of the component or equipment whenever possible.
- 2. The model number of the component or equipment shall be identified.
- 3. The specific part number shall be identified.
- 4. Documentation from the supplier shall be requested that indicates the part delivered meets the specification of the part used in the original component or equipment. If the part has been changed, the manufacturer shall be asked to indicate any changes in the operation of the component or equipment. In lieu of this documentation, the acceptance of the part shall be based on inspection or testing.

9.4 All purchase requisitions pertaining to fire protection systems and equipment shall be reviewed by an individual designated by the Plant Manager. ~~Site requisitions shall be reviewed by an individual designated by the Plant Manager. Non-plant requisitions shall be reviewed by an individual designated by the Director Power Supply Quality Assurance.~~

10.0 Instructions, Procedures, and Drawings (Monticello and Prairie Island)

- 10.1 The system of Administrative Control Directives (ACDs) shall be used to delineate responsibilities and requirements for the fire protection program.
- 10.2 Departmental instructions and procedures shall be revised or issued to implement the fire protection program responsibilities and requirements contained in the ACDs.
- 10.3 Fire protection maintenance, modifications, inspections, tests, administrative controls, drills, and training shall be prescribed by written instructions, procedures, and drawings.