



Nebraska Public Power District

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CNSS943113

April 5, 1994

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

Subject: Cooper Nuclear Station
Quality Assurance Program
NRC Docket No. 50-298, DPR-46

Gentlemen:

This letter transmits to you Revision 10 of Cooper Nuclear Station's (CNS) Quality Assurance Program. This program document is referenced in Appendix D to the USAR and is being submitted in accordance with 10CFR50.54(a) and 10CFR50.71.

Attachment "A" is a summary of the changes made and submitted herein. None of the changes represent a reduction of commitment in the CNS Quality Assurance Program.

Previous revisions to this program document which have been submitted are Rev. 1, 4/29/85; Rev. 2, 5/16/85; Rev. 3, 3/27/87; Rev. 4, 4/5/88; Rev. 5, 4/19/89; Rev. 6, 4/6/90; Rev. 7, 4/10/91; Rev. 8, 3/27/92, and Rev. 9, 4/8/93. Should you have any questions or comments concerning this revisions, please contact me.

Sincerely,

G. R. Horn
Vice President - Nuclear
Cooper Nuclear Station

GRH:VLW:ju

Attachments

cc: U. S. Nuclear Regulatory Commission
Regional Administrator - Region IV

Senior Resident Inspector

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QA POLICY DOCUMENT COMMITMENT REDUCTION DETERMINATION

Purpose: Document the determination of whether changes proposed to the CNS Quality Assurance Program Policy Document constitute a change in the existing QA program.

References: 10CFR50.54(a)(3)(ii)

1. Do any of the proposed changes to the CNS QA Policy Document include a reduction in the current quality assurance program commitments to 10CFR50, Appendix B?

Yes No

Explain reason for yes or no answer:

These changes reflect an equivalent or enhanced description of the application of 10CFR50 Appendix B to the operation of Cooper Nuclear Station. All specific changes have been evaluated with documented justifications that reveal no reduction in commitment to 10CFR50 Appendix B.

2. Do any of the proposed changes to the CNS QA Policy Document include a reduction in any other commitments currently described in the CNS Quality Assurance Program?

Yes No

Explain reason for yes or no answer:

These changes reflect an equivalent or enhanced description of Quality Assurance principles to be applied at Cooper Nuclear Station. Several changes pertain to the recent reorganization of NPG upper management and the Quality Assurance Division.

NOTE: If the answers to 1. and 2. are both No, submit in accordance with 10CFR50.54[a][3] and 10CFR50.71 [e][4].

If the answer to either 1. or 2. are yes, submit in accordance with 10CFR50.54(a)(3)(ii) and 10CFR50.4(b)(7).

3. Attach a listing that identifies each proposed change to the CNS QA Policy Document by providing the affected page number/section/paragraph, a description of the change, the reason for the change, and the basis for determining that the change continues to satisfy 10CFR50, Appendix B and all other commitments currently described in the CNS quality assurance program.

Performed By Richard Gibson Date 3-30-94

Reviewed By [Signature] Date 3-31-94
(QA Operations Manager)

Approved By [Signature] Date 4-5-94
(Division Manager - QA)

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
Cover Page	Changed titles of Quality Assurance Manager - CNS to Quality Assurance Operations Manager and Quality Assurance Manager - CGO to Quality Assurance Assessment Manager. This change is necessary due to management reorganization. This change does not constitute a reduction in commitment based on the fact that the reorganization establishes an enhanced degree of management overview at the site for Quality Assurance activities.	No
ii	Section 3.2.2 changed "Nuclear Power Group Manager" to "Vice President - Nuclear". This change is due to the recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility.	No
iii	Section 3.2.4 changed to "Quality Assurance Operations Manager". Section 3.2.5 changed to "Quality Assurance Assessment Manager". Section 3.2.9 changed from "Site Manager" to "Senior Nuclear Division Manager of Safety Assessment". Section 3.2.13 changed "CGO" to "Columbus General Office (CGO)". Section 3.2.14 changed "CNS" to "Cooper Nuclear Station (CNS)". This change is necessary due to management reorganization. This change does not constitute a reduction in commitment based on the fact that the reorganization establishes an enhanced level of management responsibility.	No
iv	Section 9.2 changed "three" to "four". Clarifies number of levels in the QA Program. Added level four to address QA Assessment. This is an enhancement to the QA Program and does not constitute a reduction in commitment.	No
v	Changed "Nuclear Power Group Manager (NPGM)" title to "Vice President - Nuclear". This change is due to the recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility.	No
1-4	Revised last sentence in paragraph two by adding the words: "To standards presently committed to by CNS" after revisions. This change helps clarify what items were met by revisions and does not decrease the level of commitment.	No

SUMMARY OF CHANGES

Attachment "A"
Page 2 of 21

PAGE	CHANGE	COMMITMENT REDUCTION
1-5	Deleted the words "Quality Assurance Instructions (QAIs)" from first sentence. QA Instructions are being placed in Nuclear Quality Procedures (NQPs). This change does not constitute a reduction in commitment based on the fact that the QAI's are going to be replaced in the NQPs and instructions are still going to be provided to the QA Staff.	No
1-6	Item i) was changed from "Nonconformance" to "Corrective Action" and added words "along with their resolutions". Deleted the words " <u>resolved and</u> " in the sentence. This change helps clarify what corrective action documents are filed as quality-related records, and does not constitute a decrease in the level of commitment.	No
1-9	Deleted the "#1" at top of page - format change. Added the definitions of Assessment to specifically identify its intent. This change helps clarify the assessment function, does not decrease the level of commitment, and is considered an enhancement to the QA Program.	No
1-10	Added the definition of audit to identify its intent. This change helps clarify the audit function and does not decrease the level of commitment.	No
1-11	Revised the sentence that defines <u>Designated Representative</u> . This change helps clarify the definition of Designated Representative and does not decrease the level of commitment.	No
1-13	Added the definition of Evaluation which helps identify job functions conducted by NPPD personnel. This addition helps clarify the evaluation function and does not constitute a reduction in commitment.	No
1-18	Deletes the words "QA Instruction," in the last paragraph. The requirements contained in QA instructions are being placed in Nuclear Quality Procedures (NQPs). This change does not constitute a reduction in commitment based on the fact that the QAI's are going to be replaced by NQPs.	No

SUMMARY OF CHANGES

Attachment "A"
Page 3 of 21

PAGE	CHANGE	COMMITMENT REDUCTION
1-19	Delete the first paragraph " <u>Quality Assurance Instructions</u> ". These instructions are being input into the NQPs as applicable. This change does not decrease level of commitment. Instructions are still documented, but are to be placed in the NQPs.	No
1-22	Changed <u>Review</u> section wording from "Site Manager" to "Vice President - Nuclear". This change is due to the recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility.	No
1-23	Changes <u>Surveillance</u> section wording from "audit" to "audit/assessment". This change helps clarify the surveillance function and does not decrease the level of commitment.	No
1-24	Added the word "and" between NQPs/QAPs. Deleted the word "QAI's". This change does not decrease the level of commitment. QAIs are to be replaced with NQPs.	No
2-1	In Section 2.1 sentence #2 changed "Nuclear Power Group Manager" to "Vice President - Nuclear" and deleted the word "Power" prior to Production at end of sentence. These changes are due to the recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility. In Section 2.1 sentence #4 added the words ",assessments, evaluations" between the words "verifications" and "and,". This addition is an enhancement to the program and does not constitute a reduction in commitment.	No
2-2/2-3	Revised Section 2.2 to more clearly define QC inspections. Deleted the words "and Instructions" in the last sentence of the first full paragraph. This change reflects current QA documents that will be reviewed periodically. Instructions are to be incorporated into NQPs. This is not a reduction in QA commitment. Also added reference to "Assessment" verification of QC Program implementation. This is a clarification change and, as such, does not constitute any decrease in the level of commitment.	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
2-3	<p>Changed "ANSI N45.2.13" to "ANSI N45.2.12" on item 2. This is considered a typo/error. The "(a)" in item 3 was deleted to reflect appropriate format. This change does not constitute a decrease in the level of commitment.</p>	No
2-4	<p>Deleted the words "and Instructions" in the last sentence of the first full paragraph. This change reflects current QA documents that will be reviewed periodically. Instructions are to be incorporated into NQPs. This is not a reduction in QA commitment.</p>	No
2-6	<p>Section 2.3 paragraph three, first sentence deleted the word "All", capitalized "D" in design, deleted the wording "forwarded to the QA Division for" (replaced this wording with the word "randomly"), added "ed" to the word review, "ly" to independent and changed the word "evaluation" to "evaluated". Also added the wording; "during QA Evaluations, Assessment, Audits and Surveillances" to the sentence. This change clarifies the intent for QA Division activities to be performed on both a preplanned and unannounced basis, and not as a matter of in-line responsibility. Such in-line responsibility can detract from required independence of the Quality Assurance Division, and contribute to decreasing the significance and extent of Level 1 and 2 Quality Assurance as described by Table 2. Therefore this change is viewed as an enhancement to the Quality Assurance Program.</p>	No
2-9	<p>Section 3 <u>NOTE</u> added a period after Procedures".)". Deleted the words "which will be verified by independent QA audit." This change clarifies the intent for QA Division activities to be performed on both a preplanned and unannounced basis, and not as a matter of in-line responsibility. Such in-line responsibility can detract from required independence of the Quality Assurance Division, and contribute to decreasing the significance and extent of Level 1 and 2 Quality Assurance as described by Table 2. Therefore this change is viewed as an enhancement to the Quality Assurance Program.</p>	No

PAGE	CHANGE	COMMITMENT REDUCTION
2-13	<p>Section 2.4 deleted the words "and Instructions" from first sentence of first paragraph and added the words "and Nuclear Quality Procedures". Instructions are being incorporated into NQPs.</p> <p>In addition, deleted the words "independent Quality Assurance," from the third paragraph. This change clarifies the intent for QA Division activities to be performed on both a preplanned and unannounced basis, and not as a matter of in-line responsibility. Such in-line responsibility can detract from required independence of the Quality Assurance Division, and contribute to decreasing the significance and extent of Level 1 and 2 Quality Assurance as described by Table 2. Therefore this change is viewed as an enhancement to the Quality Assurance Program.</p> <p>In addition changed the word (of) to "and" in paragraph number three between the words essential/quality. Also added the letters "QA" in front of the word review in same sentence. These changes were made to clarify the paragraph and do not constitute any reduction in commitment.</p> <p>Changed wording in last sentence from "Change Orders" to "Revisions". This change is editorial in nature.</p>	No
2-16	<p>Section 2.5 <u>Instructions, Procedures, and Drawings</u> deleted the last sentence in this paragraph. In-line review of procedures by QA is intended to be discontinued. This change clarifies the intent for QA Division activities to be performed on both a preplanned and unannounced basis, and not as a matter of in-line responsibility. Such in-line responsibility can detract from required independence of the Quality Assurance Division, and contribute to decreasing the significance and extent of Level 1 and 2 Quality Assurance as described by Table 2. Therefore this change is viewed as an enhancement to the Quality Assurance Program.</p> <p>This change helps clarify audit and surveillance functions and does not decrease the level of commitment.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
2-17	<p>Added "Nuclear Quality Procedures", which are described in Section 4.1.2. Level III and IV - Moved "Nuclear Power Group Directives (NPGDs)" from Level IV to Level III. The change is placing the NPGDs on a higher plane of importance, and does not constitute a reduction in commitment.</p>	No
	<p>On Section 2.6 in the first sentence the words "Columbus General Office (CGO) and Cooper Nuclear Station (CNS)" were changed to: "Nuclear Power Group (NPG)". This change is being done to reflect changes made by recent management reorganization to NPG and does not reduce level of management responsibility.</p>	
2-20	<p>Changed "Site" Manager to "Plant" Manager. This change is due to the recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility.</p>	No
2-22	<p>Section 2.9 <u>Control of Special Processes</u> sentence two was changed to delete "QA review" and "QA/" from QA/QC Inspection.</p>	No
	<p>Direct review of procedures by QA is intended to be discontinued. By removing QA from this in-line review it will enhance the QA program via instilling QA principles to the line organization. This will be accomplished via the line-organization taking full ownership, responsibility and accountability for their own work and procedures. Quality Assurance role in these activities will be to audit, assess or survey the in-line organization to verify proper implementation of the QA Program. This change does not decrease the level of commitment due to the above noted justification.</p>	
	<p>The second paragraph to Section 2.9 is being revised to reflect NPPD QA Department philosophy on reviews. Activities associated with maintenance modification and Station Operating procedures will be reviewed during QA assessment, evaluation, audit and surveillance functions. The change of this paragraph does not decrease the effectiveness of program implementation.</p>	

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
2-23	<p>Changed "Audits" to "audits/assessments, evaluations." This change reflects the use of the additional Quality Assurance techniques of Assessment and evaluation and therefore does not decrease the level of commitment.</p>	No
2-25	<p>In Section 2.11 <u>Test Control</u>, the words "Special Maintenance Procedures," in the last sentence of paragraph one, were changed to "Special Procedures". All such special maintenance procedures are currently implemented with Special Procedures. The deletion of the word maintenance does not decrease the level of commitment.</p>	No
	<p>Changed "audit" to "Audits/Assessments, Evaluations". This change reflects the use of the additional Quality Assurance techniques of Assessment and evaluation and therefore does not decrease the level of commitment.</p>	No
2-27	<p>Last sentence of the first paragraph added punctuation. This is an editorial change.</p>	No
	<p>Changed the wording in the first paragraph from "a Nonconformance Report (NCR)" to "Corrective Action Program (CAP)...used to document the discrepancy". This is not a decrease in the level of commitment in that it specifies that discrepancies will be documented under the CAP.</p>	
	<p>Deleted the words "and Instructions" in the last sentence of the first full paragraph. This change reflects current QA documents that will be reviewed periodically. Instructions are to be incorporated into NQPs. This is not a reduction in QA commitment.</p>	
2-29	<p>Changed Audits to "Audits/Assessments, Evaluations". This change reflects the use of the additional Quality Assurance techniques of Assessment and evaluation and therefore does not decrease the level of commitment.</p>	No
2-30	<p>Section 2.15 changed the wording from "The Nonconformance Reporting Program" to "<u>The Corrective Action Program</u> (CAP)" and underlined the wording to maintain format consistency. This change specifies how nonconformances are documented and does not constitute any decrease in level of commitment.</p>	No

SUMMARY OF CHANGES

Attachment "A"

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PAGE	CHANGE	COMMITMENT REDUCTION
2-31	<p>Added the wording, "or suitable reference to a previously written report". Delete the sentence "Deficiencies and/or deviations identified by QA Staff personnel shall be reported on a Quality Assurance finding form." Deficiencies identified by QA will be documented per the CAP. This change is being made to reflect QA intentions associated with the upgrade of the CNS Corrective Action Program. Delete the heading "The Deficiency Report (DR) Program". The DR process is being proposed for deletion pending incorporation of the new Corrective Action Program (CAP). Previous and subsequent paragraphs of this section provide an adequate description of the CAP such that there is no reduction in the level of effectiveness of the QA Program by this change.</p>	No
2-32	<p>In the first sentence added the word "also" between the words shall and be. Add a period "." after the word action, and deleted the words ", but which do not meet the threshold of an NCR." at the end of the sentence. This change is being made to clarify the sentence and does not constitute a reduction in commitment.</p>	
2-33	<p>Changed "CGO QA Department" to "QA Division". Changed "Nuclear Power Group Manager" to "Vice President-Nuclear". These changes are due to the recent management reorganization to the Nuclear Power Group and does not reduce management responsibility levels.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
2-33/2-34	<p>Delete the wording; "A monthly status report of open NCR's shall be prepared and distributed to:" and deleted all titles following. This report was originally issued monthly to provide management with the Nonconformances that were issued since the previous month's report as well as identifying NCR's that were open. This method of identifying open NCR status to management has become obsolete. Management is currently being notified of open NCR status via the daily meeting of the Condition Review Group (CRG), this group is made up of various CNS managers. The status of NCR's is also updated on a regular bases on the Nuclear Action Item Tracking (NAIT) System. Management has continuous access to NAIT to find out status of NCR's. In addition to the above, management participates in monthly SRAB meetings which discuss NCR status. Management also receives and reviews Quarterly Trend reports that address NCR status. Due to current methods of how management is made aware of Open NCR Status, this change does not decrease the level of commitment.</p>	No
2-36	<p>In the second to last sentence in paragraph one the words: "Appropriate follow-up action will be taken to assure that corrective action has been implemented." have been deleted and replaced with the words: "entered into a formal program for tracking and disposition." This change clarifies how results of audits will be entered into the Corrective Action Program. This change does not reduce the commitment to comply with other referenced criteria of ANSI N45.2.12 to conduct appropriate follow-up activities. It is intended that the added phrase provide the commitment to utilize a formal tracking program to facilitate such follow-up activities.</p>	No
2-38	<p>Item (5) deleted "or Engineering" and replaced with the words "and Supervisory". This change was made to reflect current accountability methods and practices being conducted at CNS in this area. The change is being made to enhance the program and does not reduce commitment requirements.</p> <p>Item (6) added "Assessment, Evaluations". This change reflects the addition of the Assessment and evaluation technique and is therefore a program enhancement.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
2-40	In the top paragraph changed the words in last sentence by adding "and work packages" between the words procedures and for. This change is being made to clarify the process and does not constitute a reduction in commitment. Added the following paragraph: "ANSI N45.2.23-1978 "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants is applicable to the CNS Operational QA Program and to the Quality Assurance Division Training Program." This change is being made to enhance the program and does not reduce commitment requirements.	No
3-1	Deleted "the three divisions of responsibility which provides for Quality Control, independent Quality Assurance Surveillance, and Quality Assurance Audits". Added "four levels of responsibility: Work Performance and Quality Control, Manager/Supervisor Overview, Quality Assurance Audit, and Quality Assessment." Changed "three" to "four" in the following paragraph. These changes more accurately describe the level of QA program implementation and accountability. The new Assessment function has been added and therefore this change viewed as a program enhancement.	No
3-2	Change title of "Nuclear Power Group Manager" to "Vice President-Nuclear" in Section 3.2.1 and 3.2.2. This change is due to recent management reorganization changes to the Nuclear Power Group and does not reduce the level of management responsibility.	No
3-3	Change "Nuclear Power Group Manager" to "Vice President-Nuclear" through the page. This change is due to recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility.	No
	In Section 3.2.3 sentence number four changed the work instructions to procedures. In sentence number five deleted the words "Quality Assurance Instructions" and added the words "Quality Assurance" in front of the word Plans. These changes were made because Quality Assurance Instructions are being incorporated into NQPs. These changes do not constitute a reduction in Program effectiveness.	

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
3-4	<p>Change "Nuclear Power Group Manager" to "Vice President-Nuclear" in order to reflect current organization changes. This change is due to the recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility.</p> <p>Replaced the words "the Nuclear Operations and Nuclear Engineering and Construction Division" with the words "all Nuclear Power Group Divisions". Also replace the words at the end of this sentence from "design reviews and approvals" to "management oversight". These changes clarify the oversight of all interfacing organizations, and is therefore considered a program description enhancement.</p>	No
3-5	<p>Title change to reflect recent reorganization of the Quality Assurance Division. Clarified the job responsibilities of the Quality Assurance Operations Manager. Changed "Site Manager" and his staff to "Senior Management personnel". Title changes to reflect recent reorganization in the Nuclear Power Group. These changes do not constitute a reduction in commitment based on the fact that the reorganization establishes an enhanced level of on-site overview.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
3-6	<p>Deleted the words "listed in Section 4.1.3 on an announced basis". Replaced the words with "identified in QA Plans". This change is a clarification of how and when audits are conducted. This is not a reduction in commitment.</p> <p>Deleted words "Quality Assurance Instructions" and replaced with words "Quality Assurance" before the word Plans. This change reflects current QA documents and where duties are documented and does not constitute a reduction in commitment.</p> <p>Title changes to reflect recent reorganization of the Quality Assurance Division. This change is necessary due to management reorganization previously described.</p> <p>Changed "Site Manager" to "Plant Manager". This change was due to the recent reorganization of management. The position of Site Manager no longer exists. This is not a reduction in program effectiveness.</p> <p>Changed the words "act on" to "evaluate". This is considered an editorial change and does not constitute a reduction in commitment.</p> <p>Second major paragraph on page 3-6, changed title from "CNS QA manager" to "QA Operations Manager", as previously described.</p> <p>Added new paragraph to describe the responsibility for maintenance of the Quality Assurance Program for Operation. This responsibility was previously assigned to the General Office QA Manager, a position no longer in effect. This change does not represent a reduction in the level of responsibility.</p>	No
3-7	<p>Changed title from "CNS QA Manager" to "QA Operations Manager" in first full sentence on page. Title change reflects recent reorganization of Quality Assurance Division. This change does not represent a reduction in the level of responsibility</p>	No

PAGE	CHANGE	COMMITMENT REDUCTION
3-7/3-8	<p>Section 3.2.5 title changes to reflect recent reorganization of the Quality Assurance Division.</p> <p>Added sentence about the intent of the "Assessment/Evaluation Program" which helps clarify the job responsibilities of the Quality Assurance Assessment Manager. This change is necessary due to management reorganization.</p> <p>Deleted sentence regarding the G.O. Quality Assurance Staff supporting the CNS QA Staff in quality matters such as internal audits and outage coverage. Changed "CGO Nuclear Divisions" to "NPG personnel" and added the words "and safe operation of the plant" to end of the sentence. The addition of these words is an enhancement to program and is not a reduction in commitment. Deleted the sentence "they shall also be responsible to perform scheduled surveillance within the General Office and verify that corrective action has been implemented." This change is due to reorganization of the QA Department. This change clarifies the responsibilities of the group and does not constitute a reduction in management responsibility levels. Revised first sentence of the third full paragraph to read as follows: "The Quality Assurance Assessment Manager is responsible for interfacing with NRC inspections conducted within various areas of the NPG." In addition, the second sentence added the words "the QA Assessment Manager" and "QA Assessment" to help clarify the sentence. The last sentence in this paragraph was deleted. This sentence identified who would act as Division Manager of QA if he were absent. This level of detail is not required to be in the Policy Document. These changes do not constitute a reduction in commitment based on the fact that the reorganization enhances the on-site capabilities of the QA Division.</p>	No
3-9/3-10	<p>Deleted the first two paragraphs of Section 3.2.7 that identifies the "General Office Quality Assurance Staff" responsibilities. These responsibilities will be under the direction of the Quality Assurance Assessments Manager at Cooper Nuclear Station. This change clarifies the responsible group and does not constitute a reduction in management responsibility levels.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
3-10	<p>In the second paragraph deleted the words "CNS Quality Assurance Staff". In addition several editorial changes were made to the paragraph to clarify the paragraph. These changes are editorial in nature and do not constitute a reduction in commitment.</p>	No
3-11	<p>Changed "Division Managers, Site Manager or Plant Manager" to "Senior Management" personnel. This change was necessitated due to the management reorganization and does not constitute a reduction in commitment based on the fact that the reorganization maintains at least the equivalent level of management responsibility.</p> <p>Deleted section entitled "<u>Secretary to the Division Manager of QA</u>". The duties of administrating and documenting the control of QA Program documents and distribution has been shifted to the Quality Assurance Managers secretary. This change is necessary due to QA Division reorganization. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains an equivalent level of responsibility.</p> <p>Section 3.2.8, changed "Nuclear Power Group Manager" to "Vice President - Nuclear" on Section 3.2.8. This change is due to the recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility.</p>	No
3-12	<p>Section 3.2.9, "Site Manager" was deleted - This position has been deleted and responsibilities have been redistributed to Senior Management.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
3-13	<p>Changed "Site Manager" to "Vice President - Nuclear". This does not constitute a reduction of management responsibilities.</p> <p>Added "Senior Nuclear Division Manager of Safety Assessment", and his responsibilities. These changes are necessary due to management reorganization to the Nuclear Power Group. These changes do not constitute a reduction in commitment based on the fact that the reorganization establishes an enhanced level of management responsibility.</p> <p>Section 3.2.11 and 3.2.12 made title change from "Nuclear Power Group Manager" to "Vice President-Nuclear". This change is due to recent management reorganization to the NPG and does not reduce the level of management responsibilities.</p> <p>In Section 3.2.12 deleted the last sentence. Responsibilities for responding to QA findings are defined in Section 2.16 of this Policy Document. This change is not a reduction in commitment in that actual responsibilities for responses are established as noted above.</p>	No
3-14	<p>Section 3.2.13 added the word "Columbus General Office" to title. Section 3.2.14, added "Cooper Nuclear Station" in front of CNS. CNS Department Managers - Clarified responsibilities for implementation of QA Program objectives. This change is due to the recent reorganization of line Management. These changes do not represent a reduction in management responsibility levels.</p>	No
	<p>Title changes to reflect reorganization. This change is necessary due to management reorganization to the Nuclear Power Group. This change does not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
3-15	<p>Changed the wording in Section 3.5 to generalize the responsibilities of SRAB to coincide with how the responsibilities are worded for SORC in Section 3.6. This change is being made to have the wording for these two groups consistent. This change does not constitute a reduction in commitment based on the fact that the responsibilities are defined and identified in CNS Radiological Technical Specifications and in the SRAB Reference Manual.</p> <p>The last paragraph in Section 3.5 was changed via moving the words "Reference 7.14" from in front of "CNS Radiological Technical Specifications" to behind it in order to clarify the sentence. In addition, the word "the" was added to the sentence to make it more clear. These changes are editorial and do not constitute a reduction in commitment.</p>	No
3-17	<p>In the top paragraph delete the words "and reviewing the procurement documents prior to awarding the contract."</p> <p>Direct review of procurement documents by QA is considered an in-line function for which QA should not be responsible. By removing QA from this in-line review it will enhance the QA program via instilling QA principles to the line organization. This will be accomplished via the line-organization taking full ownership, responsibility and accountability for their own work and procedures. Quality Assurance role in these activities will be to audit, assess or survey the line organization to verify proper implementation of the QA Program.</p>	

PAGE	CHANGE	COMMITMENT REDUCTION
4-1	<p>Section 4.1, removed reference to Quality Assurance Instructions. These Instructions are being incorporated into Nuclear Quality Procedures and such change does not constitute a reduction in the level of commitment. Deleted the last sentence in paragraph #1. Direct review of procedures by QA is considered an in-line function for which QA should not be responsible. By removing QA from this in-line review it will enhance the QA program via instilling QA principles to the line organization. This will be accomplished via the line-organization taking full ownership, responsibility and accountability for their own work and procedures. Quality Assurance role in these activities will be to audit, assess or survey the line organization to verify proper implementation of the QA Program.</p> <p>In the second paragraph in Section 4.1 the first sentence was deleted to remove reference to Quality Assurance Instructions as described previously. This change was made to clarify the paragraph. The intent of the paragraph was not changed therefore there is no reduction in commitment.</p>	No
4-2	<p>Revised Section 4.1.1 to more clearly state the responsibilities in the QC Program. This is a clarification change and, as such, does not constitute any decrease in the level of commitment.</p> <p>The deletion of the second paragraph of Section 4.1.1 does not reduce the effectiveness or level of commitment. The previous paragraph as revised, now clearly establishes the responsibility for QC program implementation to line management, and QC Program criteria establishment to Quality Assurance.</p>	No

SUMMARY OF CHANGES

Attachment "A"

Page 18 of 21

PAGE	CHANGE	COMMITMENT REDUCTION
4-4	<p>Changed 4.1.2 Section wording from "Nuclear Power Group Manager" to "Vice President - Nuclear". This change is due to the recent management reorganization to the Nuclear Power Group and does not reduce the level of management responsibility.</p> <p>Section 4.1.3 "Quality Assurance Instructions (QAI)" deleted. These instructions are being placed in Nuclear Quality Procedures (NQPs), which have an equivalent level of hierarchy, therefore this does not constitute a reduction in the level of commitment.</p>	No
4-5	<p>Section "4.1.4" has been changed to "Section 4.1.3" and revised to clarify how Quality Assurance Plans are currently being used at CNS. New Quality Assurance Plans are being developed in five broad categories consistent with the grouping of activities subject to the NRC's SALP processes. These revisions and the description of QA Plans as contained in this paragraph do not constitute a reduction in the commitment for defining the applicability of Quality Assurance criteria to those specified activities.</p> <p>In the second paragraph changed the initials "QAI" to "NQP". The format and contents of QAPs will be identified in NQP rather than QAI. No reduction in commitment is being noted due to this change.</p> <p>Revised the description of review routing for new/revised QAPs. Deletion of specific titles and generally describing that Senior Management shall be afforded a review opportunity does not constitute a reduction of the QA Program effectiveness description.</p>	No
4-6	<p>Deleted the paragraph describing the purpose of QAPs. This is redundant from section 4.1.3 and therefore does not result in a program reduction.</p> <p>Editorial change to the second paragraph. In addition the words "QAI" has been changed to "NQPs". This change does not constitute a reduction in commitment in that the NQPs describe checklists for QA surveillance and audits in the same manner as the QAIs did.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
4-7	In the second paragraph, second sentence the word "and" was added between "NQPs", "QAPs" and the words "and QAIs" were deleted. This change clarifies QA documents now in use and does not reduce commitments.	No
4-8	Title changes to reflect reorganization. This change is necessary due to management reorganization to the Nuclear Power Group. In addition, the specific "QAI-5" referenced has been changed to "NQPs" to allow incorporation of requirements into NQPs and deletion of QAIs as previously discussed. These changes do not constitute a reduction in the level of commitment.	No
5-2	The words "NQPs, QAIs and QAPs" were replaced with the words "written and approved procedures" in the first sentence. The words "Quality Assurance" were replaced with the word "responsible". These changes are being made to clarify who has responsibility for procedures in various disciplines or divisions of the Nuclear Power Group. These changes of responsibility do not reduce the commitment to the QA Program. The word "QAIs" has been deleted in paragraph one and three. Instructions in QAIs are being replaced in NQPs. No reduction of commitment results from these changes.	No
5-3	Changed the wording from "Vice President - Production" to "Vice President - Nuclear" to clarify who received QA Audit Report issued annually. There is no reduction to commitment due to this change. In second paragraph the word "Instructions" has been deleted. All QA Instructions are being deleted and incorporated into NQPs. This deletion does not constitute a reduction in commitment.	No
6-1	Change last paragraph on page to clarify how Quality Assurance records are controlled. Changed sentence to reflect that these QA records will be controlled in accordance with "ANSI N45.2.9 requirements". This change does not constitute a reduction in commitment.	No
8-1	Figure 1 was revised to reflect reorganization changes as previously described in various sections of the text. Therefore, this change does not constitute a reduction in commitment.	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
9-1	<p>Item III.B "Rod Sequence Control System (RSCS)" was deleted. This system was removed during last scheduled outage on a approved Design Change and therefore no longer is required to be covered by the QA program. This change does not constitute a reduction in commitment based on the fact that: the removal of the RSCS was done in part due to the NRC acceptance of Amendment 17 to General Electric's Topical Report. NEDE-24011-P-A "General Electric Standard Application for Reactor Fuel" (Attachment 14 and 15). This document justified the removal of the RSCS.</p>	No
9-2	<p>Editorial changes to the numbering format. Section G wording was changed to write out meaning of abbreviation. These changes are to clarify wording and do not constitute a reduction in commitment.</p>	No
9-3	<p>On Section V.A the first three items were combined to read: "Off-Gas Radioactivity Monitoring". Added item B.1 and 2 to include "Radioactive Waste Processing System 1. Dewatering System 2. Radioactive Waste Shipping." These changes are an enhancement to the program and do not constitute a reduction in commitment.</p>	No
9-5	<p>Table 2, paragraph b) was revised to reflect line manager and supervisor responsibility for assuring that controlling documents for safety-related activities include appropriate quality requirements. In this paragraph b), the last two sentences were moved to the beginning of paragraph c). These changes are being made to reflect how QA principles are being instilled into line management/organization. In paragraph c) added the words "/Surveillance" to the third level. This was done to clarify responsibilities of QA staff and is not considered a reduction in commitment. Table 2, added paragraph "d) Fourth Level - Quality Assessment". This change is made to explain the Fourth Level Responsibilities. These changes do not constitute a reduction in commitment based on the fact that the reorganization maintains the same level of management responsibility.</p>	No

SUMMARY OF CHANGES

PAGE	CHANGE	COMMITMENT REDUCTION
9-6	Added page "9-6" to continue Table 2 explanation of Fourth Level responsibilities. This change is made to explain above noted responsibilities and is not a reduction in commitment.	No