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SENIOR VICE PRESIDENT
NUCLEAR

July 7, 1984

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

BECo Letter No. 84 -098

License No. DPR-35
Docket No. 50-293

Annual Report of Changes to the Boston Edison
Quality Assurance Program Description

- References: (a) Ltr. from W. D. Harrington, Senior Vice President (BECo) to the NRC Regional Administrator (Region I), dated July 7, 1983; Subject: QA Program Description Submittal (10CFR50.54 (-))
- (b) Ltr. 1.84.034 from T. T. Martin, Director, Division of Engineering and Technical Programs (NRC Region I) to W. D. Harrington, Sr. VP (BECo), dated February 7, 1984; Subject: PNPS Updated QA Program Description Review - 10CFR50.54

Enclosure: (A) Summary of QA Program Description Changes (1983-84)

Dear Sir:

Pursuant to 10CFR50.54 (a), Boston Edison hereby submits a summary of Quality Assurance Program Description changes made since the QA Program Description was submitted by Reference (a). NRC approval of this document was given in Reference (b).

Changes were evaluated according to Quality Assurance Department Procedure 2.03, "Evaluation of QA Program Changes and Submittal to the NRC." The evaluation examines each change to determine if any requirements contained in the previously NRC approved QA Program Description were deleted or made less stringent and thereby constitute a reduction of commitments. The evaluation uses 10CFR50, Appendix B, Criterion II requirements as the basis for concluding that the revised program incorporating the change continues to satisfy the criteria of Appendix B.

All changes are summarized in Enclosure (A). None of the 28 changes issued since 7/7/83 resulted in a reduction of commitments.

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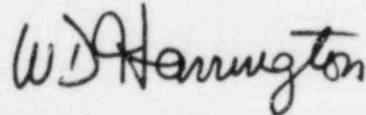
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Applicable changes to the Final Safety Analysis Report (FSAR) are being submitted with Boston Edison's annual FSAR update per 10CFR50.71(e), due to you on 7/22/84. That submittal will also meet the intent of 10CFR50.54 (a)(3)(ii).

I trust that this submittal is acceptable. However, should you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W.D. Harrington".

/pb

xc: QA Files 1.6.1

ENCLOSURE (A)

QA Program Change #II-86
Evaluation #83-81

This change modifies Section 10 of BEQAM II as follows:

The details of surveillance inspections are transferred to, and expanded in Section 18 as a more appropriate location due to the purpose of surveillance monitoring.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-87
Evaluation #83-82

This change modifies Section 7 of BEQAM II as follows:

This revision reflects a management policy decision that NOD perform new fuel receipt inspections.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-88
Evaluation #83-87

This change modifies Section 7 of BEQAM II as follows:

The change adopts the term "commercial quality control items" used in the Q-List and replaces reference to a Nuclear Operations Procedure by reference to the Q-List, to reflect actual practice. It also addresses Fire Protection items, the need for which was recently identified.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

ENCLOSURE (A)

QA Program Change #II-89
Evaluation #83-88

This change modifies Section 4 of BEQAM II as follows:

This change clarifies the intent of the existing paragraph 4.4.2 of the BEQAM by addressing two cases:

1. The revised paragraph 4.4.2 covers the case of a supplier bECo wishes to have approved per paragraph 4.4.1, but who is not fully approved.
2. New paragraph 4.4.3 covers the case of a supplier who does not need to be approved at all because of the nature of his product. The latter case also addresses a weakness identified by the NRC Resident Inspector by identifying NED's responsibility with respect to "commercial quality control items."

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-90
Evaluation #83-89

This change modifies Section 5 of BEQAM II as follows:

The change adds the requirement to establish and maintain a controlled document which identifies source documents which implement the BEQAM and ANSI 18.7-1976.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-91
Evaluation #83-90

This change modifies Section 11 of BEQAM II as follows:

References to Section 18 were changed to Section 15.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

ENCLOSURE (A)

QA Program Change #II-92
Evaluation #83-95

This change modifies Section 18 of BEQAM II as follows:

This change requires that approved Deficiency Report extension requests be submitted to the Senior VP-Nuclear for his information.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-93
Evaluation #83-96

This change modifies Section 1 of BEQAM II as follows:

1. The change identifies the QAD Organization in response to NRC comments.
2. The change reflects the current organization and responsibilities of the Executive Office.
3. The change reflects a recent Nuclear Organization change.
4. The change deletes the position of Director of Nuclear Operations Review.
5. The change replaces an ambiguous statement concerning QA assistance to line departments, and thus resolves an NRC comment. The changes also reflects current QAD responsibilities.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-94
Evaluation #83-97

This change modifies Section 2 of BEQAM II as follows:

These changes address comments by the NRC on BECo's 7/7/83 QA Program submittal. Specifically:

1. To clarify which activities fall within the scope of the QA Program.
2. To clarify that the guides and standards of Paragraph 2.3.2 apply to major modifications comparable to activities occurring during initial plant design and construction.

ENCLOSURE (A)

3. To define the scope of, and identify the responsibility for, surveillance monitoring and trend analysis as means of QA Program control.
4. To correct the inadvertent use of bi-annual (twice per year) to the proper frequency of biennial (every other year).
5. To ensure the evaluation for significance of conditions adverse to quality.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-95
Evaluation #83-98

This change modifies Section 15 of BEQAM II as follows:

These changes address comments by the NRC on BECo J 7/7/83 QA Program submittal. Specifically:

1. To include as nonconforming items or conditions problems reported by DR's and F&MR's.
2. To exclude in-process conditions from reporting requirements.
3. To specify how nonconformances reported by F&MR are documented and controlled.
4. To establish the F&MR as the means of documenting all other conditions adverse to quality not reported by NCR, DR or F&MR (hardware).
5. To require NED to document their evaluation and justification for approval of "accept" or "repair" NCR dispositions.
6. To require the originating department to review the C/A taken or to be taken for nonconforming conditions reported by F&MR.
7. To reference Section 16 for further F&MR review and Section 18 for DR processing.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

ENCLOSURE (A)

QA Program Change #II-96
Evaluation #83-99

This change modifies Section 16 of BEQAM II as follows:

1. To explicitly state that problems will be reported and resolved on NCR's, DR's, and F&MR's.
2. To place the requirement for the reporting and disposition of problems reported by NCR's and F&MR's in Section 15; and the reporting and resolution of problems reported by DR's in Section 18.
3. To indicate that resolved items or conditions will be further investigated by the department which originated the problem report.
4. To eliminate the CAR/P as the process by which requests for action and recommended preventive action plans are forwarded.
5. To require that management be kept informed concerning the actions taken to investigate and prevent recurrence of significant adverse conditions.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-97
Evaluation #83-100

This change modifies Section 18 of BEQAM II as follows:

The change expands and clarifies the function of surveillance monitoring.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-98
Evaluation #83-101

This change modifies Section 7 of BEQAM II as follows:

This change allows flexibility in use of documentation as the basis for receipt inspection; the existing wording restricted inspectors to use of BECo Purchase Order/Contract.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

ENCLOSURE (A)

QA Program Change #II-99
Evaluation #83-102

This change modifies Section 2 of BEQAM II as follows:

This change makes clear that the items to which the QA Program applies are called Q. It also clarifies where the Fire Protection List is located.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-100
Evaluation #84-01

This change modifies Section 1 of BEQAM II as follows:

The change updates the organizational structure to its current configuration.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-101
Evaluation #84-02

This change modifies Section 2 of BEQAM II as follows:

The change responds to the 10CFR20.311 requirement for conducting a quality control program to assure compliance with 10CFR61.55 and 56.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-102
Evaluation #84-03

This change modifies Section 2 of BEQAM II as follows:

The changes sets the responsibility for fixing the effective date for BEQAM changes.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

ENCLOSURE (A)

QA Program Change #II-103
Evaluation #84-04

This change modifies Section 2 of BEQAM II as follows:

The change provides references to QA Program related procedure indices.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-104
Evaluation #84-05

This change modifies Section 18 of BEQAM II as follows:

The purpose of this revision is to describe the use of the Surveillance Finding Sheet (SFS) to record:

- o Discrepancies noted during surveillance monitoring.
- o Evaluation of the discrepancies for significance.
- o Evaluations for root cause and preventive action plans to preclude recurrence.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-105
Evaluation #84-06

This change modifies Section 15 of BEQAM II as follows:

The purpose of this revision is to:

- o Replace DDN with Stores Claim Process
- o Add Surveillance Finding Sheet for documenting and resolving discrepancies noted during QAD surveillance monitoring.
- o Add Potential Conditions Adverse to Quality (PCAQ) Report for reporting and resolving all actual or suspected conditions adverse to quality not reported on F&MR, NCR, DR or SFS.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

ENCLOSURE (A)

QA Program Change #II-106
Evaluation #84-07

This change modifies Section 16 of BEQAM II as follows:

The purpose of this revision is to:

- o Add the surveillance Finding Sheet (SFS) to resolve significant discrepancies noted by QAD during surveillance monitoring.
- o Add the Potential Condition Adverse to Quality (PCAQ) to report deviations in controlled documents, failures to comply with NCR requirements, and deviations not covered by other problem reports.
- o Re-define "significant conditions adverse to quality" to broaden the scope of problems that require management attention, and include examples of significant adverse conditions that impact safety and reliability to provide guidance to what constitutes such conditions.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-108
Evaluation #84-09

This change modifies Section 2 of BEQAM II as follows:

This revision requires NOD to trend on a periodic basis conditions adverse to quality reported on F&MRs; and to require QAD to review PCAQ's and SFS's to determine whether they should be included in the trend analysis.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-109
Evaluation #84-10

This change modifies Section 2 of BEQAM II as follows:

This revision adds references regarding shipping containers and transport packages.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

ENCLOSURE (A)

QA Program Change #II-110
Evaluation #84-11

This change modifies Section 1 of BEQAM II as follows:

This change eliminates QAD Non-Q document review.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-111
Evaluation #84-12

This change modifies Section 3 of BEQAM II as follows:

These changes eliminate QAD non-Q document review.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-112
Evaluation #84-13

This change modifies Section 4 of BEQAM II as follows:

1. These revisions eliminate QAD non-Q document review.
2. This change corrects the inadvertent use of the word "nonconformance" instead of "conformance."

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-113
Evaluation #84-14

This change modifies Section 5 of BEQAM II as follows:

This change eliminates QAD non-Q document review.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

ENCLOSURE (A)

QA Program Change #II-114
Evaluation #84-15

This change modifies Section 1 of BEQAM II as follows:

This change reflects the combining of the ISI and OQC groups under the title of OQC.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.