

**BOSTON EDISON**

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

As required by 10CFR50.54(a)(3), Boston Edison submits the annual summary of changes made to the Boston Edison Quality Assurance Program Description as listed in the Boston Edison Quality Assurance Manual (BEQAM), Volume II. This report covers the period from July, 1991 to June, 1992.

We evaluated each change, summarized in Enclosure (A), to determine if any requirements contained in the previously NRC-approved QA Program Description were deleted or made less stringent. We concluded there were no reductions of commitments. 10CFR50, Appendix B, Criterion II requirements were used to conclude the revised program continues to satisfy the criteria of Appendix B.

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GGW/clc/annrptqa

Enclosure: (A) Summary of the Boston Edison QA Program Description Changes  
(1991-1992)

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SUMMARY OF THE BOSTON EDISON  
QA PROGRAM DESCRIPTION CHANGES  
(1991-1992)

QA PROGRAM CHANGE #II-247  
EVALUATION #90-08

This change modifies Section 2 of BEQAM II as follows:

To clarify the requirement that structures, systems, and components, which are designated as safety-related, are identified on the Q-List in Section 2 only, not in Section 3.

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-252  
EVALUATION #91-06

This change modifies Section 7 of BEQAM II as follows:

To eliminate the duplicate reporting requirement for supplier findings correcting a problem identified during internal oversight activities. The change also revised the reference to the nuclear industry oversight organization that is currently acceptable.

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-253  
EVALUATION #91-07

This change modifies Section 15 of BEQAM II as follows:

To clarify the operability requirements of a nonconforming item and to provide the requirements for the performance of a technical evaluation to determine operability of a nonconforming item.

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-254  
EVALUATION #91-08

This change modifies Section 2 of BEQAM II as follows:

To clarify BECo's intent that the BEQAM does not apply to the design and fabrication of shipping casks under 10CFR71.

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-256  
EVALUATION #92-02

This change modifies Section 2 of BEQAM II as follows:

To reflect a change in the BECo organization and identify the replacement of the Boston Edison Bulletin Book with the Corporate Policy Manual. A second change consolidated the responsibility for the trend analysis of all conditions adverse to quality with the Plant Department.

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-257  
EVALUATION #92-03

This change modifies Section 18 of BEQAM II as follows:

The time restriction for a required response to audit/surveillance findings was changed from 30 days to "specified time limits" to allow for a shorter response time for significant findings.

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.

This change modifies Section 4 of BEQAM II as follows:

To incorporate a number of process changes in procurement and materials management. These process changes were facilitated by formation of the Materials and Component Engineering Section (M&CES), which consolidated the procurement and materials management functions of the Nuclear Organization under a single accountable manager.

The new Materials and Component Engineering Section reports to the Vice President, Nuclear Engineering, and includes three divisions:

- Component Engineering Division (CED)
- Procurement Quality Engineering Division (PQED)
- Material Control Division (MCD)

The Section replaces the Materials Management Section of the Planning and Outage Department. It retains the Procurement Engineering Division, renaming it as the CED, and expanding its functions to include certain procurement-related functions of the Nuclear Engineering Department. It also retains the Procurement Division, renaming it as the MCD to better reflect its functions, and expanding its functions to include the services procurement function of the Business Planning & Budget Control Department. A new PQED is drawn from the Quality Engineering Division and the Operations Quality Control Division of the Quality Assurance Department.

Responsibility to identify the technical and quality assurance requirements for each item and service to be procured is transferred from the "user" organization to the M&CES.

Responsibility for the following activities is transferred from the Nuclear Engineering Department (NED) to the M&CES:

- commercial grade item evaluations to determine critical performance characteristics;
- substitution equivalency evaluations for items that are not like-for-like;
- quality category determinations for parts of Q components;
- shelf life extensions;
- nonconformance dispositions for nonconformances identified at or before receipt of procured items;
- acceptance method determinations for commercial grade items.

Responsibility to process preliminary procurement documents for services is transferred from Budget Planning & Budget Control Department (BP&BCD) to M&CES.

Responsibility to review the technical and quality assurance requirements of preliminary procurement documents is transferred to the M&CES.

Other clarifications include:

- New paragraph 4.2 collects certain general requirements and information.
- A distinction is made between nuclear grade and commercial grade items.
- The sources of technical and quality assurance requirements are described in paragraph 4.2.
- Evaluation of commercial grade items is for critical performance characteristics.
- The requirements of former paragraph 7.2.7 of Section 7 are recast as required content of preliminary procurement documents (paragraph 4.3.1).
- Reference to Spec. E-347 is deleted due to revision of the specification.
- The relationship of supplier evaluation to Section 4 is clarified via paragraph 4.4.
- An additional sentence was added to paragraph 4.5 to ensure P.O.s are not issued to non-approved suppliers when supplier evaluation is required.
- Paragraph 4.6 was rewritten, and the term "deviation" was defined via a note.

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.

This change modifies Section 7 of BEQAM 11 as follows:

To incorporate a number of process changes in procurement and materials management. These process changes were facilitated by formation of the Materials and Component Engineering Section (M&CES), which consolidated the procurement and materials management functions of the Nuclear Organization under a single accountable manager.

Responsibility for all supplier evaluation and monitoring, and product acceptance of items, is transferred from the Quality Assurance Department (QAD) to M&CES. Activities include initial and triennial supplier evaluations, supplier QA Program description reviews, supplier qualification audits and commercial grade item supplier surveys, in-process audits and surveillance (including on-site supplier surveillance monitoring), source inspections, supplier procedure review, receipt inspection and testing, Approved supplier List maintenance, and resolution of supplier conditions adverse to quality.

Other clarifications include:

- A distinction made between nuclear grade and commercial grade items.
- Supplier evaluation requirements previously in Section 4 integrated into Section 7.
- Surveys of commercial grade item suppliers and inclusion of these suppliers on the Approved Supplier List are addressed in more detail.
- Clarification of the exemption from supplier evaluation for certain fire protection system items.
- The use of ASME certificates subject to program implementation audits.
- Requirements for approval of suppliers' nonconformance dispositions moved to Section 4, paragraph 4.3.1.
- Old paragraph 7.3 moved to Section 4 to clarify the relationship of supplier evaluation to Section 4.

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-260  
EVALUATION #92-06

This change modifies Section 1 of BEQAM II as follows:

To reflect the reassignment of procurement-related functions to the Materials and Component Engineering Section (M&CES) established under the Vice President, Nuclear Engineering. QA Program Change numbers II-258 and II-259 which revised BEQAM Sections 4 and 7, respectively, further defined this change.

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-261  
EVALUATION #92-07

This change modifies Section 2 of BEQAM II as follows:

To reflect the reassignment of procurement-related functions from the Quality Assurance Department (QAD) to the newly established Materials and Component Engineering Section (M&CES). Further definition of this change was addressed in QA Program Change numbers II-258, II-259, and II-260, BEQAM Sections 4, 7, and 1, respectively.

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-262  
EVALUATION #92-08

This change modifies Section 3 of BEQAM II as follows:

To reflect the reassignment of procurement functions related to Q services from the Quality Assurance Department (QAD) to the Materials and Component Engineering Section (M&CES) as defined in BEQAM Sections 4 and 7 addressed in QA Program Change numbers II-258 and II-259, respectively.

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-263  
EVALUATION #92-09

This change modifies Section 5 of BEQAM II as follows:

To reflect the reassignment of the procurement-related functions for the review of supplier's procedures to the Materials and Component Engineering Section (M&CES). The change also clarified specific reviews in this area that are required to be performed by the Quality Assurance Department (QAD).

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-264  
EVALUATION #92-10

This change modifies Section 8 of BEQAM II as follows:

To reflect the reassignment of the responsibility for including identification requirements in procurement documents to the Materials and Component Engineering Section (M&CES). The change also reassigns receipt inspection functions from the Quality Assurance Department (QAD) to the M&CES.

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-265  
EVALUATION #92-11

This change modifies Section 9 of BEQAM II as follows:

To reflect the reassignment of the procurement-related functions for procured special processes to the Materials and Component Engineering Section (M&CES) and to clarify the Quality Assurance Department (QAD) responsibilities and required interface involved with these functions.

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-266  
EVALUATION #92-12

This change modifies Section 11 of BEQAM II as follows:

To reflect the reassignment to the Materials and Component Engineering Section (M&CES) of the procurement-related functions involving proof tests of purchase materials, equipment, and parts.

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-267  
EVALUATION #92-13

This change modifies Section 12 of BEQAM II as follows:

To reflect the title change from the National Bureau of Standards to the National Institute of Standards and Technology for measuring the test equipment certification requirements. Also to reflect the reassignment of the procurement-related functions involving measuring and test equipment to the Materials and Component Engineering Section (M&CES).

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-268  
EVALUATION #92-14

This change modifies Section 13 of BEQAM II as follows:

To reflect the reassignment of procurement-related functions involving handling, storage, and shipping of material to the Materials and Component Engineering Section (M&CES).

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-269  
EVALUATION #92-15

This change modifies Section 15 of BEQAM II as follows:

To reflect the reassignment of procurement-related functions of the Nonconformance Report (NCR) process to the Materials and Component Engineering Section (M&CES). These changes include the division of responsibility for identification, tagging, and control of NCRs between the Quality Assurance Department (QAD) and the M&CES, and the division of responsibility for disposition between the Station Organization/Nuclear Engineering Department and M&CES.

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-270  
EVALUATION #92-16

This change modifies Section 18 of BEQAM II as follows:

To reflect the reassignment of procurement-related functions to the Materials and Component Engineering Section (M&CES) and to clarify all supplier audits are controlled in accordance with BEQAM Section 7.

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-277  
EVALUATION #92-23

This change modifies Section 16 of BEQAM II as follows:

To expand the programmatic controls for the corrective action process by requiring that all identified conditions be reported via the appropriate corrective action documentation process. This allows the use of the new Problem Report System.

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 #11-278  
EVALUATION #92-24

This change modifies Section 15 of BEQAM II as follows:

To expand the programmatic controls of nonconforming materials, parts, and components to include the new Problem Report System.

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.