



**Boston Edison**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

**E. T. Boulette, PhD**

Senior Vice President — Nuclear

August 12, 1996

BECO Ltr. #2.96-073

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

Docket No. 50-293

License No. DPR-35

Relocation of Technical Specification Administrative Controls Related to Quality Assurance

By letter dated May 1, 1996, Boston Edison Company submitted proposed changes to the Pilgrim Station Technical Specifications. The changes involved relocating technical specification administrative controls related to the quality assurance review and audit requirements of Section 6, from the Pilgrim Station Technical Specifications to the Boston Edison Quality Assurance Manual (BEQAM).

The subsequent NRC review of this submittal determined additional revisions to the BEQAM would be appropriate to clarify the scope of certain sections. Accordingly, page 1 (of 6) from attachment D and pages 1 and 3 (of 6) from attachment E of the May 1, 1996 submittal are revised and enclosed.

In addition, we are supplementing the May 1, 1996 submittal to include two additional technical specification sections that are also replicated in the revised BEQAM. These revisions do not affect the conclusion previously submitted regarding our determination of no significant hazards consideration. Please refer to Enclosure A for the BEQAM revisions and Enclosure B for the technical specification revisions.

If you have any questions, please contact Mr. Jeffrey Keene, Regulatory Affairs Department Manager, at (508) 830-7876.

E. T. Boulette, PhD

ETB\JDK\pkk\radmisc/QATS

9608200051 960812  
PDR ADOCK 05000293  
P PDR

1/1

Q004

Enclosures A and B

cc: Mr. Alan B. Wang, Project Manager  
Project Directorate I-1  
Office of Nuclear Reactor Regulation  
Mail Stop: 14B2  
U. S. Nuclear Regulatory Commission  
1 White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Senior Resident Inspector  
Pilgrim Nuclear Power Station

## Enclosure A

Revised page number 1 from Attachments D and revised page numbers 1 and 3 from Attachment E of the May 1, 1996 Boston Edison Company Quality Assurance Manual proposed changes.

### Description of Revisions

Page numbers 1 of attachments D and E are revised to clarify the scope of audit content to include Program Review surveillances and reports.

Page number 3 of attachment E is revised to clarify that audit reports will be issued within 30 days of completion of the audit.

## DESCRIPTION OF CHANGES TO THE BOSTON EDISON QUALITY ASSURANCE MANUAL (BEQAM)

### INTRODUCTION

The changes made to the BEQAM and presented in this submittal represent enhancements to the overall Quality Assurance Department (QAD) Oversight Program which consists of audits, surveillances, and reviews. The changes to each of these elements of the QAD Oversight Program is presented below.

### SECTION 18, "AUDITS"

The changes to Section 18 include revisions to the Audit Program, enhancements to Surveillance Monitoring requirements, and provides new requirements for the performance of Program Reviews.

### IDENTIFICATION OF CHANGES

Changes to Paragraph 18.2.3 envelopes auditor requirements for personnel performing Program Review surveillances.

Changes to Paragraph 18.2.4 clarify and establish the BEQAM as the source for the frequency of NSRAC audits and delete the old references to the Technical Specifications for these requirements. These changes reflect the incorporation of the Nuclear Safety Review and Audit Committee (NSRAC) audit program which was previously contained in Section 6.5.B.8 of the Technical Specifications. Also, the statement reiterating compliance with the regulations, Regulatory Guides, and ANSI Standards contained in BEQAM Section 2 is redundant to actual Section 2 requirements and was deleted.

Changes to Paragraph 18.2.5 clarify BEQAM Section 18 as the source for audit program content. References to the Technical Specifications were deleted. These changes also reflect the incorporation of the NSRAC audit program which was previously contained in Section 6.5.B.8 of the Technical Specifications and includes NSRAC cognizance over Program Review surveillances and reports.

Changes to Paragraph 18.3.1 establish the specific requirements for audit program content. Audit subjects and their respective performance frequencies are now classified as either once per 24 months (QA Program, Corrective Action, Training, Technical Specifications, Refueling, Fire Protection, and Conduct of Operations) or once per 12 months (SNM, FFD, Fire Protection, and Security). These new requirements differ from the previous Technical Specification Section 6.5.B.8 requirements in the following manner:

1. The frequency of the Corrective Action Program audit changes from once per 6 months to once per 24 months.
2. The frequency of the Training and Qualification audit changes from once per 12 months to once per 24 months.

## **AUDITS**

### **18.1 PURPOSE**

This section establishes requirements for an internal auditing program to verify the implementation of and to assess the effectiveness of the Boston Edison Quality Assurance Program. This section also provides the general requirements for other QAD oversight functions, including surveillance monitoring and performance of program reviews.

### **18.2 GENERAL REQUIREMENTS**

- 18.2.1 QAD performs audits of all activities to which this Quality Assurance Program applies. Activities to which the QA Program do not apply are audited to the extent necessary to assure proper and safe operation of PNPS.
- 18.2.2 Formal QAD audits may be supplemented by surveillance monitoring to provide adequate assurance of program compliance and effectiveness. Surveillance monitoring shall be performed in accordance with Section 18.6.
- 18.2.3 Audits and program review surveillances are performed by qualified personnel, using checklists to evaluate conformance to specified requirements, as well as to assess program effectiveness. Auditors shall not have direct responsibility in the areas being audited or surveyed. Technical Specialists shall be utilized in audits or program review surveillances under the direction of an auditor, as deemed necessary.
- 18.2.4 Audit subject and frequency is based on the requirements of Paragraph 18.3.1. Additional or more frequent audits may be performed when significant changes or problems arise, and upon request by NSRAC or the Senior VP, Nuclear.
- 18.2.5 Audits and program review surveillances required by this Section are performed under the cognizance of the Nuclear Safety Review and Audit Committee (NSRAC).
- 18.2.6 Audit results, including findings, shall be documented and distributed to appropriate levels of management.

### **18.3 AUDIT PROGRAM ELEMENTS**

- 18.3.1 An audit schedule is prepared annually. The schedule reflects the applicable regulatory, license, and QA Program requirements. The audit program shall encompass, as a minimum, the following:

- 18.3.5 Audits are conducted utilizing checklists as a guide. Additional attributes may be added as conditions dictate. The audit process includes review of objective evidence, and utilizes performance-based auditing techniques such as personal interviews and the witnessing of activities, if possible, to assess overall program effectiveness.
- 18.3.6 Where applicable, the audit includes a review of findings from previous audits in the area to assess the status of ongoing corrective actions and the effectiveness of completed corrective and preventive actions.
- 18.3.7 At the conclusion of the audit, a formal post-audit conference is held with management of the audited organization(s) to discuss the audit results and present the audit findings.

#### **18.4 AUDIT REPORTS**

- 18.4.1 All QA audits are followed by an Audit Report, signed by the audit team leader, within 30 days of completion of the audit.
- 18.4.2 The Audit Report includes, as a minimum:
- Audit scope.
  - Identity of the audit team, as well as key personnel contacted during the audit.
  - Summary of the audit results, including an evaluation statement regarding the overall effectiveness of the area and organization(s) audited.
  - A description of deficiencies, as well as recommendations for improvement identified during the audit.
  - Audit Reports shall be addressed to the Senior Vice President, Nuclear, with copies distributed, as a minimum, to:
    - Management of the audited organization(s),
    - QA Department Management,
    - NSRAC Coordinator.

#### **18.5 AUDIT FINDINGS**

- 18.5.1 Findings identified during QA audits are documented on the appropriate corrective action document (refer to Section 15 or 16 of this manual).
- 18.5.2 Audit findings are discussed, as they are identified, with management of the audited organization(s).