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WILLIAM D. HARRINGTON  
SENIOR VICE PRESIDENT  
NUCLEAR

February 21, 1986  
BECo Letter No. 86-017

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

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

Request of Approval for QA Program Description  
Changes that Reduce Commitments

Reference: (a) Letter from W.D. Harrington, Senior Vice President (BECo) to the NRC Regional Administrator (Region I), dated July 7, 1985;  
Subject: Annual Report of Changes to the Boston Edison QA Program Description (BECo Ref. 2.85.121)

Enclosure: (A) Proposed QA Program Description Changes

Dear Dr. Murley:

Pursuant to 10CFR50.54(a), Boston Edison hereby submits for approval two proposed changes to the QA Program Description. These changes have been evaluated as reducing commitments which were added since the submittal of Reference (a).

Enclosure (A) identifies the changes, lists reasons for the changes, and provides the bases for BECo's evaluation as continuing to satisfy 10CFR50, Appendix B. These changes will not be implemented until approved by your office.

Please inform us of the results of your review at your earliest convenience. If you have any questions or concerns, don't hesitate to contact us.

Very truly yours,

*W.D. Harrington*

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Designated original  
Date *August Curley*  
*3/31/86*

ENCLCSURE (A)

PROPOSED QA PROGRAM DESCRIPTION CHANGES

CHANGE 1 - Current Wording (Section 2.5.6, Paragraph 4)

If a difference of opinion arises between Quality Assurance personnel and those of another department, resolution is first attempted by the Quality Assurance Manager and the other cognizant manager. If within five working days a solution acceptable to the QA Manager cannot be obtained, the matter shall be promptly referred by the QA Manager to the Vice Presidents for resolution. If a resolution acceptable to the QA Manager is not obtained after it has been referred to the Vice Presidents, the matter shall be promptly referred by the QA Manager to the Senior Vice President (Nuclear) and, if necessary, to the President, for resolution.

Change

In the fourth paragraph of 2.5.6, second sentence, remove the words "within five working days."

Reason for Change

The five day limit was found to be impractical when applied to all situations, so a 15 day time period for Deficiency Report resolution is proposed instead in Change 2 below.

Appendix B Compliance

The change does not limit persons and organizations performing quality assurance functions from having sufficient authority and organizational freedom to identify quality problems, to initiate, recommend, or provide solutions, to verify implementation of solutions, or to report findings to appropriate levels of management.

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CHANGE 2 - Current Wording (Section 18.4.6)

Should Quality Assurance not concur with actual/proposed corrective action, and be unable to obtain satisfactory resolution directly with the responsible manager, a formal request for a second response shall be forwarded to the appropriate Vice President. The Quality Assurance Manager may, if deemed appropriate, implement the requirements of Paragraph 2.5.6 of this manual.

Change

Revise the last sentence of Paragraph 18.4.6 and add a new sentence, as follows:

"... The Quality Assurance Manager may, if he deems it appropriate, implement the requirements of Paragraph 2.5.6 of this manual. In such cases involving DR resolution, the QA Manager shall refer the matter to the Vice Presidents if a resolution acceptable to him cannot be obtained within 15 days."

Reason for Change

This proposed revision, in conjunction with Change 1 above, forms a more workable system for resolution of differences of opinion.

Appendix B Compliance

This change does not limit the independence of the QA function or disrupt management reporting systems.