

## Attachment 2

### Discussion of Changes in the Quality Assurance Program Description

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in the Quality Assurance Program Description

1. UFSAR Section 17.2.1.3.1 Stop Work Authority

**Identification of the Change:**

Renumbered paragraph UFSAR Section 17.2.1.2.1 to UFSAR Section 17.2.1.3.1

**Reason for the Change:**

Renumbered paragraph to correctly identify it as UFSAR Section 17.2.1.3.1. This change corrects a typographical error in the sequencing of paragraphs.

**Basis for Concluding that Change Continues to Satisfy 10 CFR 50 Appendix B and Previous QA Program Commitments**

This change is editorial in nature regarding the correct sequencing of paragraphs. The commitments regarding Stop Work Authority remain unchanged.

This change is not a reduction in commitment.

2. UFSAR Section 17.2.3.8 Independent Review Committees

**Identification of the Change:**

Replace " ... as specified in the Technical Specifications, ...." with "...as specified in UFSAR 17.2, Appendix A, Section 6.4,...."

**Reason for the Change:**

In support of implementing Improved Technical Specifications, current Technical Specifications requirements regarding the requirements of the Operations Committee and the Safety Committee were relocated to UFSAR Section 17.2, Appendix A Section 6.4.

**Basis for Concluding that Change Continues to Satisfy 10 CFR 50 Appendix B and Previous QA Program Commitments**

The commitment for an Operations Committee and a Safety Committee are not affected by the relocation of these requirements from the Technical Specification to the QAPD. The revised reference to UFSAR 17.2, Appendix A Section 6.4 provides the location for the commitments to an Operations Committee and Safety Committee as previously stated in Technical Specifications.

This change is not a reduction in commitment.

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3. UFSAR 17.2.4.1 Scope

**Identification of the Change:**

Revised the text of the last sentence "...included in documents..." to "...included in or invoked by reference in documents..."

**Reason for the Change:**

Added "in or invoked by reference" to the last sentence in UFSAR Section 17.2.4.1 to provide consistent wording with UFSAR Section 17.2.4.4 regarding the use of references in procurement documents.

**Basis for Concluding that Change Continues to Satisfy 10 CFR 50 Appendix B and Previous QA Program Commitments**

The commitment to ensure that appropriate regulatory requirements, design bases, and other requirements are included in procurement process remains unchanged. The text has been changed to be consistent between UFSAR Section 17.2.4.1 and previously approved UFSAR Section 17.2.4.4.

This change is not a reduction in commitment.

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4. UFSAR Section 17.2.16.5 Reportable Events

**Identification of the Change:**

The following information is relocated from TS 6.6.1.a to UFSAR Section 17.2.16.5:

"Each reportable event shall be reviewed by the Operation Committee and a report shall be submitted to the Safety Committee and the Vice President, Nuclear".

**Reason for the Change:** (Reference ITS Relocate # R7 )

In support of implementing Improved Technical Specifications, current Technical Specifications requirements regarding the review of reportable events (TS 6.6.1.a) are relocated to UFSAR Section 17.2.16.5. There is no change in the requirement, only the location where it is stated.

**Basis for Concluding that Change Continues to Satisfy 10 CFR 50 Appendix B and Previous QA Program Commitments**

The commitment to provide Reportable Event reports to the Vice President, Nuclear remains unchanged. The relocation of the description of the requirement to provide the Reportable Event reports to the Vice President, Nuclear from the Technical Specifications to UFSAR Section 17.2.16.5 has no impact on previous Quality Assurance Program commitments and now places changes to these relocated requirements under the provision of 10 CFR 50.54.a.3 vs 10 CFR 50.59 and 50.90 consistent with NUREG-1433.

This change is not a reduction in commitment.

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5. UFSAR Section 17.2.17.3.1 Records Retention

**Identification of the Change:**

The following information is relocated from Technical Specification 6.10 to UFSAR Section 17.2.17.3.1:

"The following records shall be retained for at least 5 years:

1. Records and logs of facility operation covering time interval at each power level.
2. Records and logs of principal maintenance activities, inspections, and repair and replacement of principal items of equipment related to nuclear safety.
3. All Licensee Event Reports.
4. Records of surveillance activities, inspections and calibrations required by Technical Specifications.
5. Records of reactor tests and experiments.
6. Records of changes made to Operating Procedures.
7. Records of radioactive shipments.
8. Records of sealed source leak test and results.
9. Records of annual physical inventory verifying accountability of sources on record.
10. Records of radioactive effluent monitor setpoints and setpoint determinations.

The following records shall be retained for the duration of the Facility Operating License.

1. Record and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
2. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
3. Records of facility radiation and contamination surveys.
4. Records of radiation exposure for all individuals for whom monitoring was required.
5. Records of gaseous and liquid radioactive material released to the environment.

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6. Records of transient or operational cycles for those facility components designed for a limited number of transients or cycles.
7. Records of training and qualification for current members of the plant staff.
8. Records of in-service inspections performed pursuant to the Technical Specifications
9. Records of Quality Assurance activities required by the QA Manual with the exception of the records to be retained for 5 years as noted above.
10. Records of reviews performed for changes made to procedures or equipment or reviews for tests and experiments pursuant to 10CFR 50.59.
11. Records of meetings of the Operations Committee and the Safety Committee.
12. Records of the service lives of all safety-related hydraulic and mechanical snubbers including the date at which the service life commences and associated installation and maintenance records.
13. Records of results of analyses required by the radiological environmental monitoring program.
14. Records of reviews performed for changes made to the Offsite Dose Assessment Manual and the Process Control Program."

**Reason for the Change:** (Reference ITS Relocate # R14 )

In support of implementing Improved Technical Specifications, current Technical Specifications requirements regarding the description of record retention requirements (TS 6.6.1.a) are relocated to UFSAR Section 17.2.17.3.1. There is no change in the requirement, only the location where it is stated.

**Basis for Concluding that Change Continues to Satisfy 10 CFR 50 Appendix B and Previous QA Program Commitments**

The commitment to properly store records remains unchanged. The relocation of the description of the requirement to properly store records from the Technical Specifications to UFSAR Section 17.2.17.3.1 has no impact on previous Quality Assurance Program commitments and now places changes to these relocated requirements under the provision of 10 CFR 50.54.a.3 vs 10 CFR 50.59 and 50.90 consistent with NUREG-1433.



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6. UFSAR 17.2 , Appendix A, Section 6.4 Independent Review Committees

**Identification of the Change:**

Current Technical Specification requirements regarding the Operations Committee (6.5.1) and Safety Committee ( 6.5.2) have been merged with the provisions of N18.7 previously specified. While overall content is unchanged, titles are updated. Plant Superintendent, Nuclear is changed to Plant Manager, Nuclear. The title of the Chairman of the Safety Committee is changed from the Assistant Plant Superintendent -Operations and Maintenance to the Manager, Outage and Support. UFSAR 17.2, Appendix A, Section 6.4 is revised to incorporate the former Technical Specification language as follows:

- 6.4.1 The **Operations Committee** shall function to advise the Plant Manager, Nuclear on all matters related to nuclear safety. The committee shall be composed of Managers, Supervisors and personnel selected from the following departments: Operations, Maintenance, Reactor Performance, Radiation Protection, Quality Control, and Technical Support. The Manager, Outage and Support shall act as the Chairman. One or more of the members shall be designated as Vice Chairman. All alternate members shall be appointed in writing by the Plant Manager, Nuclear to serve on a permanent basis; however, no more than three alternates shall participate as voting members in Operations Committee activities at any one time. The committee shall meet at least once per calendar month and as convened by the Operations Committee Chairman or Vice Chairman. A quorum of the Operations Committee shall consist of the Chairman or Vice Chairman and five members including alternates.

The Operations Committee shall be responsible for:

- a. review of (1) written procedures involving nuclear safety, including applicable check off lists and instructions, covering areas listed below:
  - Normal startup, operation, and shutdown of systems and components of the facility.
  - Refueling operation.
  - Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including responses to alarms, suspected primary system leaks, and abnormal reactivity changes.
  - Emergency and off-normal condition procedures.

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- Preventive and corrective maintenance operations which could have an effect on nuclear safety of the facility.
  - Surveillance and testing requirements of equipment that could have an effect on the nuclear safety of the facility.
  - Operation of radioactive waste systems.
  - Fire Protection Program implementation.
  - A preventive maintenance and periodic visual examination program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient to as low as practical levels. This program shall also include provisions for performance of periodic systems leak tests of each system once per Operating Cycle.
  - Program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions, including training of personnel, procedures for monitoring and provisions for maintenance of sampling and analysis equipment.
  - Administrative procedures for shift overtime for Operations personnel to be consistent with Commission's June 15, 1982 policy statement.
  - Offsite Dose Assessment Manual.
  - Process Control Program.
  - Quality Control Program for effluents.
- (2) any other proposed procedures or changes thereto as determined by the Plant Manager, Nuclear to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
  - c. Review of all proposed changes to the Technical Specifications.
  - d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
  - e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Vice President, Nuclear and the Chairman of the Safety Committee.



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- f. Review of all Reportable Events.
- g. Review of facility operational to detect potential safety hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Chairman of the Safety Committee.
- i. Review of Plant Security Plan.
- j. Review of Emergency Plan.
- k. Review of every unplanned release of radioactivity to the environs for which report to the NRC is required.
- l. Review of changes to the Offsite Dose Assessment Manual and changes to the Process Control Program.
- m. Review of the Fire Protection Program and implementing procedures.

The Operations Committee has the authority to:

- (a) recommend to the Plant Manager, Nuclear written approval or disapproval items (a) through (d) above,
- (b) render determinations in writing with regard to whether or not each item (a) through (e) above constitutes an unreviewed safety question,
- (c) provide written notification within 24 hours to the Vice President, Nuclear and the Safety Committee of disagreement between the Operations Committee and the Plant Manager, Nuclear; however, the Plant Manager, Nuclear shall have responsibility for resolution of such disagreements.

The Operations Committee shall maintain written minutes of each meeting and copies shall be provided to the Vice President, Nuclear and the Chairman of the Safety Committee.

6.4.2 The **Safety Committee** shall function to provide independent review and audit of designated activities in the areas of :

- a. Nuclear power plant operations.
- b. Nuclear engineering.
- c. Chemistry and radiochemistry.
- d. Metallurgy.
- e. Instrumentation and control.

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- f. Radiological safety.
- g. Mechanical and electrical engineering.
- h. Quality Assurance practices.
- i. Non-destructive testing.
- j. Administration.

The Safety Committee shall be composed of persons who have been appointed in writing by the President to serve on a permanent basis and who collectively have or have access to applicable technical and experimental expertise in the a. through j. areas above. All alternate members shall be appointed in writing by the President to serve on a permanent basis. Consultants shall be utilized as determined by the Safety Committee Chairman to provide expert advice to the Safety Committee. The Safety Committee shall meet at least once per calendar quarter during the initial year of facility operation following fuel load and at least once per six months thereafter. A quorum of the Safety Committee shall consist of the Chairman or Vice Chairman and at least four members with a maximum of two alternates as voting members. No more than a minority of the voting members shall have line responsibility for operation of the facility.

The Safety Committee shall be responsible for the review of :

- a. The safety evaluation for (1) changes to procedures, and (2) tests or experiments completed under the provisions of Section 50.59, 10 CFR, to verify that such actions did not constitute an unreviewed safety question.
- b. Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in Section 50.59, 10 CFR.
- c. Proposed tests or experiments which involved an unreviewed safety question as defined in Section 50.59, 10 CFR
- d. Proposed changes in Technical Specifications or licenses.
- e. Violations of applicable statutes, codes, regulations, orders, technical specifications, license requirements, or of internal procedures or instructions having nuclear safety significance.
- f. Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety.
- g. All reportable events.

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- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety-related structures, systems, or components.
- i. Reports and meeting minutes of the Operations Committee.

The Safety Committee shall report to and advise the President on those areas of responsibility specified for items (a) through (i) above. Records of Safety Committee activities shall be prepared, approved, and distributed as noted below:

- a. Minutes of each Safety Committee meeting shall be prepared, approved, and forwarded to the President within 14 days following each meeting.
- b. Reports of reviews for items (a) through (i) above shall be prepared, approved and forwarded to the President within 14 days following completion of the review.

**Reason for the Change:** (Reference ITS Relocate # R7)

In support of implementing Improved Technical Specifications (NUREG-1433), current Technical Specifications requirements regarding the authority and responsibilities of the Operations Committee (TS 6.5.1) and Safety Committee (TS 6.5.2) are relocated to UFSAR 17.2, Appendix A, Section 6.4. Previously, page 17.2 A-4, Section 6.4 described the quorum requirements for meetings of the Safety Committee. Such requirements remain unchanged and continue to be included in Section 6.4. Titles of committee members are updated. Plant Superintendent, Nuclear is changed to Plant Manager, Nuclear. The position of Assistant Superintendent-Operations and Maintenance previously reported to the Plant Superintendent, Nuclear and was designated as Operations Committee Chairman. The Manager, Outage and Support is now designated Operations Committee Chairman by the Plant Manager, Nuclear and the position also reports directly to the Plant Manager, Nuclear. Furthermore, the commitment to 10 CFR 50, Appendix B Criterion I remains unchanged regarding the delineation of the responsibilities and authorities of the Operations and Safety Committees.

There is no change in the requirement, only the location where it is stated.

**Basis for Concluding that Change Continues to Satisfy 10 CFR 50 Appendix B and Previous QA Program Commitments**

The commitment to provide for a functional and effective Operations Committee (6.5.1) and Safety Committee (6.5.2) remains unchanged. The relocation of the description of the requirement to provide for a functional and effective Operations Committee and Safety Committee from the Technical Specifications to UFSAR Section 17.2.17.3.1 has no impact on previous Quality Assurance Program commitments and now places changes to these relocated requirements under the provision of 10 CFR 50.54.a.3 vs 10 CFR 50.59 and 50.90 consistent with NUREG-1433.

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7. UFSAR 17.2, Appendix A, Section 6.7 Temporary Minor Changes

**Identification of the Change:**

Provisions of Technical Specification 6.8.3 incorporated, specifically added to the last sentence: "These temporary minor changes shall be documented and promptly reviewed by the Operations Committee and by the Plant Manager, or designee. Subsequent incorporation, if necessary, as a permanent change shall be in accord with approved procedure review and approval procedures."

**Reason for the Change:** (Reference ITS Relocate # R9)

In support of implementing Improved Technical Specifications (NUREG-1433), current Technical Specifications requirements regarding temporary minor changes (TS 6.8.3) are relocated to UFSAR 17.2 Appendix 6.7. There is no change in the requirement, only the location where it is stated.

**Basis for Concluding that Change Continues to Satisfy 10 CFR 50 Appendix B and Previous QA Program Commitments**

Previous Quality Assurance commitments to control temporary minor changes remain unchanged. Moving the expectation for documenting and promptly reviewing temporary minor changes from the Technical Specifications to UFSAR 17.2, Appendix A, Section 6.7 consolidates the description of temporary minor changes with similar administrative processes. The commitment to 10 CFR 50 Appendix B, Criterion VI regarding the control of changes to documents remains unchanged. Furthermore, the commitment to ANSI 18.7, Section 5.2.2 regarding the control of temporary changes to procedures remains unchanged.

This change is not a reduction in commitment.



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8. UFSAR 17.2, Appendix A, Section 6.14

**Identification of the Change:**

Previous requirements stated in Technical Specification 6.8.2 are incorporated into UFSAR 17.2, Appendix A, Section 6.14 to indicate that plant procedures and changes thereto are reviewed and approved prior to implementation:

The following procedures "and changes thereto, shall be reviewed by the Operations Committee as indicated in" Section 6.4 above and approved by the Plant Manager, Nuclear "or designee prior to implementation, except as provided in" Section 6.7 above:

- "1. Normal startup, operation, and shutdown of systems and components of the facility.
2. Refueling operation.
3. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components, including responses to alarms, suspected primary system leaks, and abnormal reactivity changes.
4. Emergency and off-normal condition procedures. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33.
5. Preventive and corrective maintenance operations which could have an effect on the nuclear safety of the facility.
6. Surveillance and testing requirements of equipment that could have an effect on the nuclear safety of the facility."
7. "Operation of radioactive waste systems."
8. "Fire Protection Program implementation."
9. "A preventive maintenance and periodic visual examination program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient to as low as practical levels. This program shall also include provisions for performance of periodic systems leak tests of each system once per operating cycle. This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup (only to second



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isolation valve), Post accident Sampling, Containment Atmospheric Monitoring, Control Rod Drive (scram discharge volume only) and Liquid Radwaste (only Reactor Building Floor and Equipment Drain sumps, piping, and tanks up to and including collector tanks). The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
  - b. System leak test requirements for each system at refueling cycle intervals or less."
10. "Program to ensure that capability to accurately determine the airborne iodine concentration in vital areas under accident conditions, including training of personnel, procedures for monitoring and provisions for maintenance of sampling and analysis equipment."
11. "Administrative procedures for shift overtime for Operations personnel to be consistent with the Commission's June 15, 1982 policy statement. The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12)."

**Reason for the Change:** (Reference ITS Relocate # R9)

In support of implementing Improved Technical Specifications (NUREG-1433), current Technical Specifications requirements regarding the review of procedures prior to implementation (TS 6.8.2) are relocated to UFSAR 17.2, Appendix A, Section 16.4. There is no change in the requirement, only the location where it is stated.

**Basis for Concluding that Change Continues to Satisfy 10 CFR 50 Appendix B and Previous QA Program Commitments**

The commitment for the Operations Committee to review selected procedures prior to implementation remains unchanged. The relocation of the requirement for the Operations Committee to review selected procedures prior to implementation from the Technical Specifications to UFSAR 17.2, Appendix A, Section 6.14 consolidates the description of the administrative functions of the Committee, and provides an additional level of detail in the QAPD. The commitment to ANSI N 18.7, Section 5.2.15 remains unchanged regarding the review and approval of procedures prior to implementation. Additionally, the commitment to 10 CFR 50, Criterion V remains unchanged regarding the review and approval of procedures.

This change is not a reduction in commitment.