

**YANKEE ATOMIC ELECTRIC COMPANY**

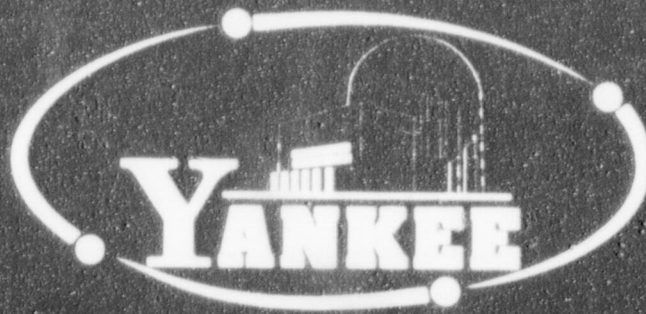


**YANKEE  
DECOMMISSIONING  
QUALITY ASSURANCE  
PROGRAM**

**YDQAP**

9909030168 990831  
PDR ADOCK 05000029  
W PDR

**YANKEE ATOMIC ELECTRIC COMPANY**



**YANKEE  
DECOMMISSIONING  
QUALITY ASSURANCE  
PROGRAM**

**YDQAP**

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**ATTACHMENT A**

## ATTACHMENT A

### YDQAP Summary of Changes - Revision 29

Item No.	YDQAP Section	Change Description	Reason for Change
1.	-	Replaces QA department functions with the applicable responsible organization, such as the Independent Review and Audit Committee.	To reflect organizational changes.
2.	-	Adds responsibilities and required actions to reflect compliance to 10CFR71 and 10CFR72.	Needed to follow items that are safety-related, and items, which are important to safety in a decommissioning environment.
3.	-	Editorial changes are made throughout the document to revise the grammar for clarification and correctness.	Editorial
4.	-	Changes "Manager of Quality Assurance", to "Decommissioning Manager of Quality Assurance" where applicable throughout the document.	To reflect organizational change and structure.
5.	-	Changes "Engineering Manager" to "Decommissioning Manager" where applicable throughout the document.	To reflect organizational change and structure.
6.	-	Changes "Director, Quality Assurance", to "Oversight Manager" where applicable throughout the document.	To reflect organizational change and structure.
7.	-	Revises headers and footers and text of individual pages to "Revision 29" and revises the issuance date of the document when applicable.	Editorial changes necessary to identify Revision 29 as a controlled document.
8.	-	Page I Changes the personnel titles and the names of the signatories.	To reflect organizational changes.
9.	-	Page VI Adds Revision 29 to the Amendment/Revision Sheet and provides the reason for the revision as "To update the Program to include 10CFR72 and to redefine responsibilities and requirements based on the current status of the plant".	To provide a summary of the Revision 29 document changes.
10.	Sections II through XVIII	Added a responsibility in these sections for the QA Organization to "...perform audits/surveillances of the implementation...." of each of these criteria.	To assure that the activities governed by these sections are assessed by the QA Organization.
11.	Policy Statement	Page 1 of 2, Paragraph 2 Replaces the reference to the "Quality Oversight Program" with the "Decommissioning Quality Assurance Program".	To reflect organizational changes.



Item No.	YDQAP Section	Change Description	Reason for Change
12.	Policy Statement	Page 1 of 2, Paragraph 2 Revises the mission statement to reflect compliance to 10CFR71, Subpart H, and 10CFR72, Subpart G, in addition to 10CFR50, Appendix B. Applies administrative requirements to "all items and activities that are important as defined in administrative procedures." DQAP applicable structures, systems and components are defined in Appendix C.	Provides a more comprehensive listing of applicable regulations and items covered by the Decommissioning Quality Assurance Program.
13.	Policy Statement	Page 1 of 2, Paragraph 3 Adds the function to "communicate with management" the adequacy, content, etc. of the Quality Assurance Program.	Further defines the function of the Quality Assurance Program.
14.	Policy Statement	Page 1 of 2, Paragraph 5 Replaces "Director of Quality Assurance" with "Decommissioning Quality Assurance Manager". Also places the "overall responsibility" responsibility for program implementation with the Chairman, Chief Executive Officer, and President.	To reflect organizational changes.
15.	Policy Statement	Page 1, Paragraph 5 Adds requirements of "10CFR71, Subpart H and 10CFR72, Subpart G" to the requirements met by the Quality Assurance staff.	Reflects QA mission to treat items that are safety-related, or important to safety under these regulations.
16.	Policy Statement	Page 1, Paragraph 6 Strikes the words "at the plant" from the implementation of the program's procedural requirements.	Reflects the responsibility of the Decommissioning Manager to implement the requirements in all venues.
17.	Policy Statement	Page 2 of 2, Paragraph 1 Replaces "Nuclear Safety Audit" with "Independent Review Committee".	To reflect organizational changes.
18.	I	Page 1 of 4, B. Responsibility, Paragraph 1 Limits the organizational responsibility of the Yankee Atomic Electric Company to "decommissioning and spent fuel storage".	To reflect the decommissioned plant environment.
19.	I	Page 1 of 4, B. Responsibility, Paragraph 3 Removes parenthesis from YAEC.	Editorial
20.	I	Page 1 of 4, B. Responsibility, Paragraph 3 Places the responsibility for review and audit of the DQAP with the "Outsourced Quality Assurance Organization" reporting through the Oversight Manager to the CEO.	To reflect organizational changes.
21.	I	Page 1 of 4, Organizational Relationships Removes the responsibility of integration of contracted and site services from the Decommissioning Manager.	To reflect organizational changes.

Item No.	YDQAP Section	Change Description	Reason for Change
22.	I	Beginning on Page 1 of 4, Removes the following personnel and responsibilities from the listing of Quality Assurance Program Responsibilities: President and Chief Executive Officer, Director of Quality Assurance Manager, Decommissioning QA Engineering Manager Licensing Manager Decommissioning Manager Plant Superintendent Shift Supervisors Construction Manager Training Coordinator Site Services Supervisor Radiation Protection and Chemistry Manager Health and Safety Manager	To reflect organizational changes.
23.	I	Page 1 of 4 Adds the "Chairman, Chief Executive Officer and President" and a description of his Quality Assurance responsibilities to Section D.	To reflect organizational changes and definition of QA responsibilities.
24.	I	Page 2 of 4 Adds the "Decommissioning Manager" and a description of his Quality Assurance responsibilities to Section D.	To reflect organizational changes and definition of QA responsibilities.
25.	I	Page 2 of 4 Adds the "Plant Superintendent" and a description of his Quality Assurance responsibilities to Section D.	To reflect organizational changes and definition of QA responsibilities.
26.	I	Page 2 of 4 Adds the "Oversight Manager" and a description of his Quality Assurance responsibilities to Section D.	To reflect organizational changes and definition of QA responsibilities.
27.	I	Page 2 of 4 Adds the "Decommissioning Quality Assurance Manager" and a description of his Quality Assurance responsibilities to Section D.	To reflect organizational changes and definition of QA responsibilities.
28.	I	Page 3 of 4 Adds the "Independent Review Committees" and a description of their Quality Assurance responsibilities to Section D.	To reflect organizational changes and definition of QA responsibilities.
29.	I	Page 3 of 4 Deletes Section E, "Review and Audit" from the document.	To reflect organizational changes.
30.	I	Page 4 of 4, Figure 1 Replaces Figure 1, "Yankee Organization" with the revised organization chart.	To reflect organizational changes.



Item No.	YDQAP Section	Change Description	Reason for Change
31.	II	Page 1 of 4, Scope, Paragraph 1 Limits the scope of the QA program to the applicable structures, systems, and components as listed in Appendix C.	To reflect the scope of the QA program during decommissioning.
32.	II	Page 1 of 4, Responsibilities, Item 1 Reduces the full regulation title to "10CFR50" and removes ANSI N18.7-1976 as a specific responsibility.	To reflect the scope of the QA program during decommissioning.
33.	II	Page 1 of 4, Responsibilities, Item 1 Replaces "specified" equipment with "appropriate" equipment, and replaces program "criterion" with "section".	To reflect compliance to QA program scope changes.
34.	II	Page 1 of 4, Responsibilities, Item 2 Replaces "Decommissioning Quality Assurance Program" with its abbreviation and changes "direct responsibilities" to "overall responsibility".	Editorial
35.	II	Page 1 of 4, Responsibilities, Item 3 Adds the "Quality Assurance Organization" and assigns them the responsibility to perform audits and surveillances.	To reflect organizational changes.
36.	II	Page 1 of 4, Implementation Deletes "Decommissioning and Spent Fuel Storage" from the term "Quality Assurance Program" and replaces "consideration" with "implementation" of regulatory requirements.	Editorial and to reflect conformance to regulatory requirements rather than consideration.
37.	II	Page 1 of 4, Implementation Deletes "conformance with ...regulatory positions" and "as modified by Appendix B".	Editorial
38.	II	Page 1 of 4, Implementation Replaces the "Quality Assurance Department" with the "Quality Assurance Organization" and deletes the "Chairman" from the Yankee chain of responsibility.	To reflect organizational changes.
39.	II	Page 2 of 4, Implementation Deletes the following items from the itemized regulations (and renumbers the remaining items): ANSI N45.2.1-1973, ANSI N45.2.4-1974, ANSI N45.2.8-1975, 10CFR71 Subparts H and G, Regulatory Guide 1.29, Revision 3, Seismic Design Classification.	To reflect the scope of the QA Program during decommissioning.
40.	II	Page 3 of 4, Implementation, Note 5 Replaces "Decommissioning QA Program" with the abbreviation "DQAP" and applies the DQAP to "applicable activities".	Editorial and to reflect changes in the QA program scope.

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41.	II	Page 3 of 4, Implementation, Note 6 Allows a previously approved NRC SER to be used to make changes which reduce commitments under the same approval conditions.	Clarifies submittal requirements.
42.	II	Page 3 of 4, Management Evaluation Replaces "President and Chief Executive Officer" with "Chairman, CEO and President"	To reflect organizational changes.
43.	II	Page 3 of 4, Management Evaluation Replaces "Decommissioning Quality Assurance Program" with the abbreviation "DQAP".	Editorial
44.	II	Page 3 of 4, Management Evaluation Makes the "Chairman, CEO and President" responsible for performing periodic evaluations of the DQAP.	To reflect organizational changes.
45.	II	Page 3 of 4, Training Deletes "affecting quality during plant decommissioning and spent fuel storage and/or license commitments".	To reflect organizational changes.
46.	II	Page 3 of 4, Training Deletes Item 2, the responsibilities of the Training Coordinator, and renumbers the remaining items.	To reflect organizational changes.
47.	II	Page 4 of 4, Training Deletes the following from training Documentation: Item c, "Documentation of the scope, objective and method of implementing the program", and Item e, "Documentation of the training sessions including content, attendance, dates and results where applicable". Requirement included in new Item 3.	To reflect organizational and program changes.
48.	III	Page 1 of 2, Scope Replaces the "Decommissioning Quality Assurance Program" and replaces it with the abbreviation "DQAP".	Editorial
49.	III	Page 1 of 2, Responsibilities, Item 1 Replaces the design control responsibilities assigned to the Quality Assurance Department with "Design activities associated with applicable SSC's have been delegated to Duke Engineering & Services..."	To reflect organizational changes.
50.	III	Page 1 of 2, Responsibilities, Item 1 Replaces the responsibilities of the "Engineering Manager" with that of Duke Engineering & Services.	To reflect organizational changes.



Item No.	YDQAP Section	Change Description	Reason for Change
51.	III	Page 1 of 2, Responsibilities, Item 1.a Deletes "NRC mandated" from independent reviews.	Clarifies the requirement for all independent reviews.
52.	III	Page 1 of 2, Responsibilities, Items 1.c and 1.e. Added "when required" to statements.	Clarification of the requirement
53.	III	Page 1 of 2, Responsibilities, Item 2 Replaces the "Plant Operations Committee" with the "Independent Reviews Committee" whose activities are defined in Section 6 of the Defueled Technical Specifications.	To reflect organizational changes and reflect the QA Program scope.
54.	III	Page 1 of 2, Itemized responsibilities of Independent Reviews and the Decommissioning Manager Deletes all itemized design control activities.	Reflects compliance of design control Quality Assurance to appropriate items.
55.	III	Page 1 of 2, Responsibilities, Items 1.c and 1.e. Added "when required" to statements.	Clarification of the requirement
56.	III	Page 2 of 2, Responsibilities, Deleted the responsibilities of the NSARC now assigned to the Independent Review Committees. Deleted the responsibilities of the Decommissioning Manager and Plant Superintendent now assigned to DE&S, and redefined the responsibility of the Decommissioning Manager with respect to design control.	To reflect the organizational change and to be consistent with Technical Specifications Section 6.0.
57.	III	Page 2 of 2, Implementation, Item 2 Deletes "reactor physics" from suitable design control activities.	Reflects the scope of QA programs during decommissioning.
58.	III	Page 2 of 2, Implementation, Item 4 Deletes the requirement that "procedures" supply the criteria for test verification and states that the "criteria ... will be provided".	Editorial
59.	III	Page 2 of 2, Implementation, Item 5 Subjects design and specification changes to the same controls and approval applicable to the original design, unless delegated in writing to another organization.	Clarification of the requirement.
60.	III	Page 2 of 2, Implementation, Items 6, 7 & 8 Replaces "safety" functions of structures, systems and components with "quality" functions of structures, systems and components.	To reflect the scope of the QA Program during decommissioning.
61.	IV	Page 1 of 2, Scope Replaces the "Decommissioning Quality Assurance Program" with the abbreviation "DQAP".	Editorial

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62.	IV	Page 1 of 2, Responsibilities, Item 1 Replaces the procurement document control function of the "Quality Assurance Department" with "DE & S (approved vendor)".	To reflect organizational changes.
63.	IV	Page 1 of 2, Responsibilities, Item 1 Replaces the "preparation, review, issue and control of purchase documents" with the "preparation of detailed procedures as to how purchase documents are prepared...".	Editorial and to reflect organizational changes.
64.	IV	Page 1 of 2, Responsibilities, Item 2 Replaces and redefines the procurement document control responsibilities of the "Engineering Department" with those of the "Decommissioning Manager".	To reflect organizational and scope changes.
65.	IV	Page 1 of 2, Implementation, Item 1 Add "maintain" to availability of documents.	Editorial and clarification.
66.	IV	Page 2 of 2, Implementation, Item 3 Replaces "prior to use" with "prior to purchase".	Correction
67.	IV	Page 2 of 2, Implementation, Item 3 Adds the word "applicable" to procurement document specification.	To reflect changes in the program scope.
68.	IV	Page 2 of 2, Implementation, Item 3.f. Replaces the "Quality Assurance Department's right of access..." with "The right of access...".	Editorial and to reflect organizational changes.
69.	V	Page 1 of 2, Scope Replaces the "Decommissioning Quality Assurance Program" with its abbreviation "DQAP".	Editorial
70.	V	Page 1 of 2, Responsibilities, Item 1 Replaces the responsibility of "Each Department Director/Supervisor" with "The Decommissioning Manager".	To reflect organizational changes.
71.	V	Page 1 of 2, Responsibilities, Item 2 Adds the phrase "which satisfies the requirements of" in front of "10CFR71..."	Clarification and reflects changes in the program scope.
72.	V	Page 1 of 2, Responsibilities, Item 2.a. Deletes the responsibilities of the "Quality Assurance Department", the "Engineering Manager" and the "Plant Operations Review Committee" and delegates the "Decommissioning Manager" with the responsibility of "preparing, approving, maintaining, and approving all instructions, drawings and procedures associated with plant and contracted services quality activities".	To reflect organizational changes.



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73.	V	Page 1 of 2, Responsibilities, Item 2 Assigns the Independent Review Committee with the responsibility of reviewing items defined in the Defueled Technical Specifications.	To reflect organizational changes.
74.	V	Page 1 of 2, Responsibilities , Item 3 Assigns the responsibility for audits and/or surveillances to the Quality Assurance Organization.	To reflect organizational changes.
75.	V	Page 2 of 2, Implementation, Item 2 Deletes the following implemented actions "inspection plans, test, calibration, special process, maintenance and repair" and specifies that action will include "Review of quality procedures, drawings and specifications, and changes thereto by knowledgeable personnel".	To reflect organizational changes.
76.	VI	Page 1 of 2, Responsibilities, Item 1 Delegates all document control functions to the "Decommissioning Manager" and removes all unique responsibilities previously assigned to the "plant", the "Engineering Manager" and the "Director of Quality Assurance".	To reflect organizational changes.
77.	VI	Page 1 of 2, Responsibilities, Item 2 Assigns the responsibility to perform audits and surveillances to the " Quality Assurance Organization".	To reflect organizational changes.
78.	VI	Page 2 of 2, Implementation, Item 1 Replaces the responsibility to review and approve changes from the "original reviewer" organization with the same "effected" organization or with "an organization delegated by the controlling authority".	To reflect organizational changes.
79.	VI	Page 2 of 2, Implementation, Item 3 Replaces the requirement to "provide the availability of documents" with the provision to "allow the availability of documents, as needed".	To reflect organizational and scope changes.
80.	VI	Page 2 of 2, Implementation, Item 4 Removes "cancelled procedures" from the requirement to be listed in the master list of controlled documents.	Clarification of requirement.
81.	VI	Page 2 of 2, Implementation, Item 5 Replaces a listing of controlled document types with the "Control of documents identified in administrative procedures".	To reflect changes in the program scope.
82.	VII	Page 1 of 2, Scope, Replace the "Decommissioning Quality Assurance Program" with its abbreviation the "DQAP".	Editorial

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83.	VII	Page 1 of 2, Responsibilities, Item 1 Replaces the "Quality Assurance Department" with the "Quality Assurance Organization" and adds the responsibility of audits and surveillances to this organization.	To reflect organizational changes.
84.	VII	Page 1 of 2, Responsibilities, Item 1.c. Replaces the "Yankee Atomic Electric Company Approved Vendors List" with the "an approved vendors list".	To reflect organizational changes.
85.	VII	Page 1 of 2, Responsibilities, Item 2 Deletes the responsibilities of the "Quality Assurance Department/Engineering Manager" and replaces the responsibilities of the "Plant Manager" and the "Plant Site Services Department" with those designated to the "Decommissioning Manager".	To reflect organizational changes.
86.	VII	Page 1 of 2, Implementation, Item 1.a. Adds the phrase "which satisfies the requirements of" in front of "10CFR71..."	Editorial and to reflect changes in the program scope.
87.	VII	Page 2 of 2, Implementation Item 4 Replaces the review and acceptance of vendor documentation by a responsible "quality assurance individual" with a "responsible, qualified individual".	To reflect organizational changes.
88.	VII	Page 2 of 2, Implementation Item 5, Replaces the detailed listing of assured items with "Receipt inspections of vendor furnished material/services, in accordance with predetermined instructions".	Clarification of receipt inspection requirements.
89.	VIII	Page 1 of 2, Scope Replaces the "Decommissioning Quality Assurance Organization" with its abbreviation "DQAP".	Editorial
90.	VIII	Page 1 of 2, Responsibilities, Item 2 Deletes the responsibility of the "Plant" for the preparation and approval of documents for the "storage of lubricants".	To reflect changes in the program scope.
91.	VIII	Page 1 of 2, Responsibilities, Item 1 Replaces the "Quality Assurance Department" with the "Quality Assurance Organization".	To reflect organizational changes.
92.	VIII	Page 1 of 2, Responsibilities, Item 3 Replaces the responsibilities of the "Engineering Manager" with the "Decommissioning Manager".	To reflect organizational changes.
93.	VIII	Page 1 of 2, Responsibilities, Item 4 Assigns the responsibility of audits and surveillances to the "Quality Assurance Organization".	To reflect organizational changes.
94.	VIII	Page 1 of 2, Implementation Replace "actions" with "applicable actions listed below".	To reflect changes in the program scope.



Item No.	YDQAP Section	Change Description	Reason for Change
95.	IX	Page 1 of 2, Responsibilities, Item 1 Deletes the responsibility of the Quality Assurance Department for specific items in the control of special processes.	To reflect organizational changes.
96.	IX	Page 1 of 2, Responsibilities, Item 1 Deletes the responsibilities of the "Plant" and the "Engineering Manager" and assigns these responsibilities to the "Decommissioning Manager". Adds the responsibility for "implementation" of special processes to the Decommissioning Manager.	To reflect organizational changes.
97.	X	Page 1 of 2, Responsibilities, Item 1 Replaces the "Quality Assurance Department" with the "Quality Assurance Organization".	To reflect organizational changes.
98.	X	Page 1 of 2, Responsibilities, Item 1 Removes the requirement to "review installation and test procedures and maintenance requests to ascertain the extent of any required QA surveillances and mandatory hold points for inspections", and renumbers the list.	To reflect changes in the program scope.
99.	X	Page 1 of 1, Responsibilities, Items 1.e & 1.f. Added the responsibility for the QA Organization to perform audit, surveillance and review of inspection procedures and inspections performed by others.	To reflect organizational changes.
100.	X	Page 1 of 2, Responsibilities, Item 2 Assigns the "Plant" responsibilities for Inspection to the "Decommissioning Manager".	To reflect organizational changes.
101.	X	Page 2 of 2, Implementation, Item 2 Deletes the reference to instructions or checklists "which incorporate the details listed in Section XVII Item C.1.a."	To reflect changes in the program scope.
102.	X	Page 2 of 2, Implementation, Item 7 Assigns the review of maintenance documents to "knowledgeable personnel" instead of "qualified personnel in quality assurance".	To reflect organizational changes.
103.	XI	Page 1 of 2, Responsibilities, Item 1 Replaces the "Quality Assurance Department" with the "Quality Assurance Organization" and defines its responsibility as "audit and/or surveillance of test program activities".	To reflect organizational changes.
104.	XI	Page 1 of 2, Responsibilities, Item 2 Assigns the responsibilities for test control of the "Engineering Manager/Plant Manager" to the "Decommissioning Manager".	Editorial and to reflect organizational changes.

Item No.	YDQAP Section	Change Description	Reason for Change
105.	XI	Page 1 of 2, Responsibilities, Item 3 and 4 Removes the responsibilities of the "Nuclear Safety Audit and Review Committee" and the "Plant Operations Review Committee" from specific actions in test control.	To reflect changes in organization and scope.
106.	XI	Page 2 of 2, Implementation, Item 2 Deletes the listing of test prerequisites and replaces it with "test prerequisites and defined".	To reflect changes in the program scope.
107.	XI	Page 2 of 2, Implementation, Item c. Deletes the former Item c. requirement that procedures "provide for specification of test equipment with suitable accuracy. The criteria for determining the accuracy requirements of test equipment shall be provided when identification of specific equipment is not practical".	To reflect changes in the program scope.
108.	XII	Page 1 of 1, Scope Replaces the "Decommissioning Quality Assurance Program" with its abbreviation "DQAP".	Editorial
109.	XII	Page 1 of 1, Responsibilities, Item 1 Replaces and summarizes the "Plant" responsibilities with the "Decommissioning Manager" making him/her solely responsible for "ensuring the development and implementation of documents for control of measuring and test equipment, including identification, calibration and documentation records".	To reflect organizational changes.
110.	XII	Page 1 of 1, Implementation, Item 1 Replaced the list for identifying and labeling measuring and test equipment with a summarizing phrase.	Editorial.
111.	XIII	Page 1 of 1, Responsibilities, Item 1 Assigns the responsibilities of the "Plant" for Handling, Storage and Shipping to the "Decommissioning Manager" and reformats the items.	Editorial and to reflect organizational changes.
112.	XIII	Page 1 of 1, Implementation Replaces the listing of specific actions with a summarizing phrase for developing and implementation documents for "special handling, preservation, storage, cleaning, packaging, and shipping by qualified individuals, in accordance with predetermined work and inspection instructions".	Editorial and to reflect changes in the program scope.
113.	XIV	Page 1 of 1, Responsibilities Assigns the responsibilities of the "Plant" for inspection test and operating status to the "Decommissioning Manager".	To reflect organizational changes.

Item No.	YDQAP Section	Change Description	Reason for Change
114.	XIV	Page 1 of 1, Responsibilities Assigns the responsibility to perform audits and/or surveillances to the " Quality Assurance Organization".	To reflect organizational changes.
115.	XIV	Page 1 of 1, Responsibilities Replaces the listing of specific responsibilities of the Decommissioning Manager with the phrase "The Decommissioning Manager shall be responsible for ensuring the control of operating equipment or systems, including the use of qualified personnel".	To reflect changes in the program scope.
116.	XIV	Page 1 of 1, Implementation Replaces the listing of specific actions with a summary paragraph that requires "procedural controls for inspecting, testing, and operating status of structures, systems, and components, utilizing status indicators, such as tags, markings, labels and stamps".	To reflect changes in the program scope.
117.	XV	Page 1 of 1, Scope Replaces the "Decommissioning Quality Assurance Program" with its abbreviation "DQAP".	Editorial
118.	XV	Page 1 of 2, Responsibilities Reassigns and reformats the specific responsibilities assigned to the "Engineering Manager " and the "Decommissioning Manager" solely to the "Decommissioning Manager".	To reflect organizational changes.
119.	XV	Page 1 of 2, Responsibilities Deletes the responsibilities assigned to the "Quality Assurance Department".	To reflect organizational changes.
120.	XV	Page 1 of 2, Implementation, Item 1.c. Adds the term "subsequent" to inspections and tests of reworked items.	Clarification.
121.	XV	Page 2 of 2, Implementation, Item 2 Replaces "nonconformance report" with "Condition Report" and "disposition" with "final disposition".	VY Specific and clarification.
122.	XVI	Page 1 of 1, Scope Deletes the partial parenthesis before "Decommissioning".	Editorial
123.	XVI	Page 1 of 1, Responsibilities Adds the responsibility to perform audits and/or surveillances to the " Quality Assurance Organization".	To reflect organizational changes.



Item No.	YDQAP Section	Change Description	Reason for Change
124.	XVI	Page 1 of 1, Responsibilities Reassigns the itemized responsibilities for corrective action of the "Quality Assurance Department", "Plant", "Engineering Manager" and the "Plant Operations Review Committee" to the "Decommissioning Manager" and summarizes his/her responsibility.	To reflect organizational changes.
125.	XVI	Page 1 of 1, Implementation, Items 1 to 4 Summarizes the action items as: "Documentation of conditions adverse to quality; initiation of corrective action for conditions adverse to quality...; periodic reviews to verify proper implementation of corrective actions, and reporting significant conditions adverse to quality to appropriate levels of management".	Clarification and editorial.
126.	XVII	Page 1 of 1, Scope, Items 1 and 2 Adds the word "applicable" to the phrase "plant history" and replaces the "Decommissioning Quality Assurance Program" with its abbreviation "DQAP".	To reflect changes in program scope and editorial.
127.	XVII	Page 1 of 1, Responsibilities, Item 1 Replaces the responsibilities of the "Quality Assurance Department" with the "Quality Assurance Organization", and summarizes their responsibility as "shall be responsible for the control of applicable records and for performance of audits and surveillances...".	To reflect changes in the program scope and organizational changes.
128.	XVII	Page 1 of 1, Responsibilities, Item 2 Reassigns the responsibilities for quality assurance records from the "plant" to the Decommissioning Manager and summarizes his/her responsibilities.	To reflect changes in the program scope and organizational changes.
129.	XVII	Page 1 of 1, Responsibilities, Item 2 Defines the Decommissioning Manager's responsibility as "establishing a system for the identification, review, approval and retention of documents...implementation as defined in Section 6... and for assuring its implementation".	To reflect changes in the program scope and organizational changes.
130.	XVII	Page 1 of 1, Implementation Removes the listing of detailed action items and summarizes the action required as "the implementation of an established process which provides for administration, receipt, storage, preservation, safe keeping, retrieval, and final inspection of records".	To reflect changes in the program scope.
131.	XVII	Page 1 of 1, Implementation Replaces the term "location" of record storage with "siting" of record storage.	Editorial

Item No.	YDQAP Section	Change Description	Reason for Change
132.	XVII	Page 1 of 1, Implementation Requires duplicate records to be stored in a separate remote location when the item is not "permanently maintained" in the records storage facility as opposed to "not included" in the records storage facility.	Clarification of the storage requirement.
133.	XVIII	Page 1 of 2, Scope Replaces the "Decommissioning Quality Assurance Program" with its abbreviation "DQAP".	Editorial
134.	XVIII	Page 1 of 2, Responsibilities Replaces the "Quality Assurance Department" with the "Quality Assurance Organization".	To reflect organizational changes.
135.	XVIII	Page 1 of 2, Responsibilities, Item 1.c. Deletes "Plant" in "Audit Surveillance Programs" and reference to Sections III and XVII of the document.	VY specific.
136.	XVIII	Page 1 of 2, Responsibilities, Item 1.d. Replaces the "Nuclear Safety Audit and Review Committee" with "IRAC". Also deletes "Plant" in the term "Audit Surveillance Programs".	To reflect organizational changes.
137.	XVIII	Page 1 of 2, Responsibilities, Item 1.e. Replaces the word "audit" with "vendor oversight".	To reflect changes in the program scope.
138.	XVIII	Page 1 of 2, Responsibilities, Item 1.f Replaces "discrepancies" with "findings" and removes the term "surveillances" from "audits/surveillances".	Clarifies the requirement.
139.	XVIII	Page 1 of 2, Responsibilities, Item 1.g. Rephrased to "Providing recommendations to preclude recurrence of audit/surveillance findings.	Clarifies the requirement.
140.	XVIII	Page 1 of 2, Responsibilities, Item 1.h. Targets periodic audits to "functional areas, activities, and procedures under the DQAP" rather "all functional areas".	Reflects changes in the program scope and clarifies the requirement.
141.	XVIII	Page 1 of 2, Responsibilities, remaining items. Deletes the responsibilities for audits from the "plant" and the "Nuclear Safety Audit and Review Committee".	To reflect organizational changes.
142.	XVIII	Page 2 of 2, Implementation Reduces the actions required for implementation to a list of 6 applicable items and rephrases the requirements. Deletes audit requirements for areas of an operating plant, such as operation, maintenance and repair, implementation of operating and test procedures, and calibration of measuring and test equipment.	To reflect changes in the program scope clarification, and editorial.

Item No.	YDQAP Section	Change Description	Reason for Change
143.	Appendix B	Page 1 of 13, Title Change "Exceptions" to "Decommissioning Quality Assurance Program Exceptions".	Clarification
144.	Appendix B	Page 1 of 13 and subsequent pages Deletes Sub-Categories associated with ANSI N45.2.3-1973 and R.G. 1.29, Rev.3, and all associated exceptions relating to these two standards.	To reflect changes in the program scope.
145.	Appendix C	Page 1 of 1, Title Delete the word "Yankee" from the title "Yankee Classification of Structures, Components and Systems".	Editorial
146.	Appendix C	Page 1 of 1 Replace "NOTE: A comprehensive listing is in the Yankee Safety Classification Manual" with "Safety-Related None".	To reflect changes in the program scope.
147.	Appendix C	Page 1 of 1 Adds the heading " <u>Important to Safety as Defined in 10CFR72</u> " and the paragraph "The Safety Classification of Systems, Structures and Components (SSCs) will be defined prior to the design and construction of the ISFSI".	To reflect changes in the program scope.



ATTACHMENT B

YANKEE ATOMIC ELECTRIC COMPANY  
DECOMMISSIONING QUALITY ASSURANCE PROGRAM  
YDQAP

PREPARED BY:

~~Walter K. Peterson~~ C. Russell Clark  
Manager, Decommissioning QA

REVIEWED BY:

~~C. Russell Clark~~ Walter K. Peterson  
~~Director, Quality Assurance~~ Oversight Manager

Donald A. Reid  
Decommissioning Manager

APPROVED BY:

Don K. Davis  
~~President and Chief Executive Officer~~ Chairman, Chief Executive Officer and

President

Title: YDQAP  
Page: I  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999

YANKEE ATOMIC ELECTRIC COMPANY

YDQAP

TABLE OF CONTENTS/INDEX

<u>Section No.</u>	<u>Title</u>	<u>Revision</u>
-	AMENDMENT/REVISION	<u>2829</u>
-	POLICY STATEMENT	<u>2829</u>
I	ORGANIZATION	<u>2829</u>
II	QUALITY ASSURANCE PROGRAM	<u>2829</u>
III	DESIGN CONTROL	<u>2829</u>
IV	PROCUREMENT DOCUMENT CONTROL	<u>2829</u>
VI	DOCUMENT CONTROL	<u>2829</u>
VII	CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES	<u>2829</u>
VIII	IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS	<u>2829</u>
IX	CONTROL OF SPECIAL PROCESSES	<u>2829</u>
X	INSPECTION	<u>2829</u>
XI	TEST CONTROL	<u>2829</u>
XII	CONTROL OF MEASURING AND TEST EQUIPMENT	<u>2829</u>
XIII	HANDLING, STORAGE, AND SHIPPING	<u>2829</u>
XIV	INSPECTION, TEST, AND OPERATING STATUS	<u>2829</u>
XV	NONCONFORMING MATERIALS, PARTS, AND COMPONENTS	<u>2829</u>
XVI	CORRECTIVE ACTION	<u>2829</u>
XVII	QUALITY ASSURANCE RECORDS	<u>2829</u>

Title: YDQAP  
 Page: II  
 Rev.: 2829  
 Date: ~~October 16, 1998~~ August 1999



YANKEE ATOMIC ELECTRIC COMPANY

YDQAP

TABLE OF CONTENTS/INDEX  
(Continued)

<u>Section No.</u>	<u>Title</u>	<u>Revision</u>
XVIII	AUDITS	<u>2829</u>
APPENDIX A	QUALIFICATION REQUIREMENTS	<u>2829</u>
APPENDIX B	<u>DECOMMISSIONING QUALITY ASSURANCE PROGRAM EXCEPTIONS</u>	<u>2829</u>
APPENDIX C	<u>YR SYSTEMS, STRUCTURES AND COMPONENTS CLASSIFICATION</u>	<u>2829</u>

Title: YDQAP  
Page: III  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999

# YANKEE ATOMIC ELECTRIC COMPANY

## YDQAP

### AMENDMENT/REVISION SHEET

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
0 (Amendment 1)	12/10/76	To address questions submitted by letter from NRC (K. R. Goller) to L. H. Heider (11/1/76).
0 (Amendment 2)	1/13/77	To address questions submitted by letter from NRC (K. R. Goller) to L. H. Heider (12/28/76).
1	9/15/77	To address organizational, programmatic, and editorial changes.
2	11/01/77	To address organizational changes.
3	11/25/77	To address organizational changes at Vermont Yankee.
4	1/13/78	To address combined inspection numbers 50-29/77-20; 50-271/77-15; and 50-309/77-16 unresolved item 4.a.
5	1/30/78	To address change in exception for ANSI N45.2.3-1973.
6	10/19/78	To address exceptions to ANSI N45.2.2-1972.
6 (Amendment 1)	3/29/79	To resolve items submitted by letter from NRC (W. P. Haass) to L. H. Heider (3/6/79).
7	9/11/79	To address changes to Yankee Rowe (Appendix D) and Vermont Yankee (Appendix E) Safety Classifications.
8	4/04/80	To address organizational changes.
9	3/09/81	To address organizational changes.
10	4/03/81	To add "Packaging of Radioactive Materials" and "Fire Protection of Safety-Related Areas" to "Other Items Requiring Quality Assurance".
11	3/01/82	To resolve items submitted by letter from NRC (W. P. Haass) to W. P. Johnson (6/10/81).
12	3/11/83	To address organizational changes.
13		To address organizational and programmatic changes.
14	10/12/83	To address organizational changes.
15	2/15/84	To address programmatic changes.
16	10/31/85	To address organizational and programmatic changes.

Title: YDQAP  
 Page: IV  
 Rev.: 2829  
 Date: ~~October 16, 1998~~ August 1999

YANKEE ATOMIC ELECTRIC COMPANY

YDQAP

AMENDMENT/REVISION SHEET

(Continued)

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
17	12/05/86	To address organizational and programmatic changes.
17A	8/14/87	To clarify surveillance activities and change VP-MOO responsibilities for the level of deficiencies requiring evaluation.
18	4/29/88	To address organizational and programmatic changes.
19	10/02/89	To address organizational and responsibility changes and deletion of Appendix C.
19A	6/01/90	To update organizational chart (for VY) to be consistent with Proposed Change No. 157 and to address organizational changes at Vermont Yankee.
20	12/21/90	To update organizational changes at Yankee and change QAD's responsibility from reviewing design documents to auditing those documents for inclusion of quality requirements.
21	11/15/91	To update organizational changes at Yankee and Vermont Yankee and change QAD responsibility from revising recommendations to prevent recurrences of significant condition adverse to quality to providing the option to review and/or audit recommendations.
22	4/15/92	To delete Appendix D listing and reference Yankee Safety Classification of Systems Manual.
23	9/30/92	To address organizational and responsibility changes.
24	12/15/93	To address organizational changes, and DQA/NSARC reporting clarifications for Vermont Yankee.
25	12/15/94	To address organizational changes made at the Yankee Nuclear Power Station addressing the decommissioning organization. Clarifications in the revised corrective action process at Vermont Yankee, and to address an exception to Regulatory Guide 1.64, and to clarify responsibilities between the Yankee and Vermont Yankee Plants.
26	12/21/95	To address organizational changes at the Yankee Nuclear Power Station and the Vermont Yankee Nuclear Power Station. To address exceptions to ANSI 18.7 and Regulatory Guide 1.33.
27	12/20/96	To address organizational changes.

Title: YDQAP  
Page: V  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999



YANKEE ATOMIC ELECTRIC COMPANY

YDQAP

AMENDMENT/REVISION SHEET

(Continued)

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
28	5/30/97	To update organizational changes. Changed exception to Regulatory Guide 1.26 for VY only. <u>(This was withdrawn in BYR 98-025, dated 4/14/98.)</u>
28	10/16/98	Resubmit Rev. 28 to update organizational changes, delineate decommissioning organization and eliminate all references to Vermont Yankee Nuclear Power Corporation.
<u>29</u>	<u>8/31/99</u>	<u>To update the Program to include 10CFR72 and to redefine responsibilities and requirements based on the current status of the plant.</u>

Title: YDQAP  
Page: VI  
Rev.: ~~28~~29  
Date: ~~October 16, 1998~~August 1999

# YANKEE ATOMIC ELECTRIC COMPANY

## POLICY STATEMENT

### DECOMMISSIONING QUALITY ASSURANCE PROGRAM

It is the policy of those organizations operating under this Decommissioning Quality Assurance Program to strive for excellence in all aspects of nuclear power plant decommissioning and spent fuel storage. This goal can only be attained if each individual recognizes that Quality is everyone's responsibility. Each worker, supervisor, and manager has a role to play in achieving the goal of "doing it right the first time." Only if we recognize that Quality is of paramount importance can we continue to provide for safe decommissioning and fuel storage.

This Decommissioning Quality Assurance Program applies to all activities associated with structures, systems, and components which are safety-related or important to safety controlled by 10CFR71 and 10CFR72. This program implements 10CFR50, Appendix B, and satisfies 10CFR71, Subpart H; and 10CFR72, Subpart G. Certain additional administrative requirements are applied to other items and activities that are important as defined in administrative procedures. DQAP applicable structures, systems, and components are defined in Appendix C.

The function of the Quality Oversight Program is to assess and communicate to management the adequacy, content, and appropriateness of the work being performed and to facilitate continuous enhancements. ~~This function supports the line organizations and provides management with needed feedback.~~ However, supervision and management ~~should~~ does not rely solely upon the efforts of the Quality Assurance Groups for quality oversight; they ~~must~~ also take an active role in self-assessment of those activities under their control to identify quality problems. As previously noted, the ultimate responsibility for quality lies with each individual.

Under the program, The Yankee Atomic Electric Company ~~President and Chairman~~, Chief Executive Officer, and President is the final management authority responsible for assuring that this policy statement and the Decommissioning Quality Assurance Program are implemented within the Yankee Atomic Electric Company.

The ~~Chairman, President and~~ Chief Executive Officer, and President ~~is~~ has overall responsible ility for assuring implementation of the program ~~for those departments under his (or her) direction.~~ The President has delegated to the ~~Director of Quality Assurance~~ Decommissioning Quality Assurance Manager under the cognizance of the Oversight Manager the responsibility for establishment, control, and distribution of the Decommissioning Quality Assurance Program and revisions thereto, and establishment of policies under which the Quality Assurance Department operates. The Quality Assurance staff shall have the authority and organizational freedom to meet the requirements of 10CFR50, Appendix B, which satisfies 10CFR71, Subpart H; and 10CFR72, Subpart G.

The Decommissioning Manager shall be responsible for the day-to-day implementation of the program's procedural requirements ~~at the plant.~~

Title: Policy Statement  
Page: 1 of 2  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999

## YANKEE ATOMIC ELECTRIC COMPANY

The ~~An Nuclear Safety Audit and Independent~~ Review Committee shall review the adequacy and effectiveness of this program as defined in the Defueled Technical Specifications. Any ~~discrepancies and/or~~ recommendations for corrections, ~~or~~ enhancements, or concerns shall be reported to the ~~President and Chairman, Chief Executive Officer, and President~~.

The safe and reliable decommissioning and spent fuel storage can only be achieved with the cooperation and support of all personnel. Every individual is expected to perform his or her task with the skill, professionalism, and dedication necessary to achieve this goal.

Title: Policy Statement  
Page: 2 of 2  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999



# YANKEE ATOMIC ELECTRIC COMPANY

## I. ORGANIZATION

### A. SCOPE

This section of the Decommissioning Quality Assurance Program describes the duties and responsibilities of the personnel involved in establishing and executing the Decommissioning Quality Assurance Program.

### B. RESPONSIBILITY

The responsibility for ~~design, redesign, evaluation, decommissioning, and spent fuel storage, and operation at~~ the Yankee Nuclear Power Station rests with the Yankee Atomic Electric Company. The responsibility for developing and implementing the Quality Assurance Program within the Yankee Site is vested in the ~~President and Chairman, Chief Executive Officer, and President~~ of the Yankee Atomic Electric Company. He has delegated certain areas of authority for the development and implementation of certain phases of the Program as set forth in the following paragraphs of this section.

Duke Engineering and Services (DE&S) has been retained by the Yankee Atomic Electric Company (YAEC) to provide certain QA management, engineering and related technical and administrative support services. All work performed by DE&S under the terms of the agreement, shall be performed in accordance with the applicable programs and procedures required per this manual, or the DE&S QA Program as approved by YAEC.

The Quality Assurance ~~Department~~Organization, reporting to the ~~President and Chairman, Chief Executive Officer, and President~~ for (YAEC) through the Oversight Manager has the organizational responsibility for the continuing review and audit of the implementation of the Decommissioning Quality Assurance Program.

### C. ORGANIZATIONAL RELATIONSHIPS

The lines of authority of all personnel and functional positions involved in the implementation of the Decommissioning Quality Assurance Program are shown in Figure 1. ~~Integration between the Yankee Site and contracted services is provided by the Decommissioning Manager.~~

### D. QUALITY ASSURANCE PROGRAM RESPONSIBILITIES

1. ~~Yankee Corporate~~

a. ~~President and Chief Executive Officer~~

1. ~~Assumes and maintains overall responsibility for the Decommissioning Quality Assurance Program.~~

## YANKEE ATOMIC ELECTRIC COMPANY

2. ~~Delegates to the Director of Quality Assurance the responsibility for establishment, control and distribution of the Decommissioning Quality Assurance Program, and revisions thereto.~~
  3. ~~Establishes and enforces company policies in the area of Quality Assurance.~~
  4. ~~Establishes and implements an organization capable of and directed toward a proper Decommissioning Quality Assurance Program.~~
  5. ~~Resolves disputes between Quality Assurance/ Quality Control personnel and other organizations, involving quality, for the Yankee Site and contracted services.~~
  6. ~~Responsible for Yankee Site nuclear safety.~~
  7. ~~Review and approve all changes to the Decommissioning Quality Assurance Program.~~
- b. ~~Director of Quality Assurance~~
1. ~~Reports directly to the President.~~
  2. ~~Establishes the qualification requirements for the principal Quality Assurance management positions to assure competence commensurate with responsibility. See Appendix A.~~
  3. ~~Reviews all changes to the Decommissioning Quality Assurance Program.~~
  4. ~~Reviews or provides company policy relative to Quality Assurance practices conducted at the Site and any contracted organization.~~
  5. ~~Authorizes personnel performing Quality Assurance functions to have direct access to management levels which will assure accomplishment of quality-affecting activities.~~
  6. ~~Establishes policies under which the Quality Assurance Department functions.~~
  7. ~~Provides for establishment of, and control and distribution of the Decommissioning Quality Assurance Program and revisions thereto.~~
  8. ~~Provides for implementation of the Program within the Quality Assurance Department.~~

## YANKEE ATOMIC ELECTRIC COMPANY

9. ~~Provides to NSARC a periodic review of the Decommissioning Quality Assurance Program to determine the adequacy and effectiveness of the Program. Provide for evaluations of changes to the Decommissioning Quality Assurance Program to the requirements of 10CFR50.54(a)(3).~~
10. ~~Provides, through the Quality Assurance Department, for independent verification of site activities by individuals or groups who do not have direct responsibility for performing the work, to assure that applicable approved procedures, specifications, licenses and safety regulations are satisfied.~~
11. ~~Ensures that personnel performing Quality Assurance functions have sufficient authority and organizational freedom to:~~
  - a. ~~identify quality problems,~~
  - b. ~~initiate, recommend, or provide solutions through designated channels, and~~
  - c. ~~verify implementation of solutions.~~
12. ~~Provides for review of and compliance with federal and state regulations and standards for nuclear power facilities.~~
13. ~~Appoints the NDE and N45.2.6 Level III Examiner~~
- e. ~~Manager, Decommissioning QA~~
  1. ~~The Manager, Decommissioning QA reports directly to the Director of Quality Assurance.~~
  2. ~~Assures that the Decommissioning Quality Assurance Program satisfies the requirements of 10CFR50 Appendix B.~~
  3. ~~Provides for the audit of design changes and specifications to verify adequacy of quality requirements.~~
  4. ~~Provides for the audit, inspection and/or surveillance of contractor/vendor activities to assure the effectiveness of contractual interfaces and compliance with the Decommissioning QA Program.~~
  5. ~~Provides for the inspection, surveillance and/or audit of activities pertaining to plant or site repairs, and/or changes.~~
  6. ~~Provides for the training and retraining of Quality Assurance personnel in quality assurance and audit techniques.~~
  7. ~~Ensures through verification that the Program is implemented for all activities requiring decommissioning quality assurance.~~



## YANKEE ATOMIC ELECTRIC COMPANY

8. ~~Has authority for the stoppage of unsatisfactory work; and for the control of further processing or delivery of nonconforming material.~~
9. ~~Directs the independent verification of plant activities to assure that applicable approved procedures, specifications, licenses, and safety regulations are satisfied.~~
10. ~~Ensures that the QA Program is modified and/or revised as standards, regulations and experience dictate.~~

### d. ~~Engineering Manager~~

1. ~~Reports to the Decommissioning Manager.~~
2. ~~Responsible for coordination of activities pertaining to State, Federal, and license requirements.~~
3. ~~Provides for independent review and acceptance for selected plant repairs, all safety-related engineering design changes and decommissioning work packages for the site.~~
4. ~~Provides for review of material service purchase requests, drawings, specifications, and appropriate procedures.~~
5. ~~Coordinates and directs engineering services necessary to support the decommissioning of the site.~~
6. ~~Assures engineering activities are conducted in accordance with the Decommissioning Quality Assurance Program.~~
7. ~~Assures the Quality Assurance/Quality Control standards and/or requirements are provided on all applicable documents.~~

### e. ~~Licensing Manager~~

1. ~~Reports to the Decommissioning Manager.~~
2. ~~Responsible for coordination of activities pertaining to state, federal, and license requirements.~~

## 2. ~~Yankee Site~~

### a. ~~Decommissioning Manager~~

1. ~~Reports directly to the President and Chief Executive Officer.~~
2. ~~Acts as Manager of Operations as defined in the Defueled Technical Specifications and Site Manager as defined in the FSAR.~~

## YANKEE ATOMIC ELECTRIC COMPANY

3. Responsible for the safe, orderly and efficient decommissioning, and spent fuel storage at the site, and for compliance with the requirements of the license and applicable State and Federal laws and regulations.
4. Provides for review of industry decommissioning problems with the aim of minimizing likelihood of occurrence at the plant.
5. The Assistant Site Manager is delegated as the alternate to the Decommissioning Manager during his absence with the authority and responsibility thereof.
6. Maintains communications with the Training Coordinator involving plant training needs.
7. Evaluates the site's position on specified in-plant audit discrepancies and prepares "Implementation Directives" for the site.
8. Coordinates the contracted engineering, licensing, cost control and planning, and site decommissioning activities.
9. Provides for implementation of the Decommissioning Quality Assurance Program within the Decommissioning Organization.
10. Ensures that applicable Program procedures are  
implemented within the Decommissioning  
Organization.
11. Provides for independent review and acceptance for selected plant repairs and all safety-related engineering design changes for the site and decommissioning work packages.
12. Provides for review of material service purchase requests, drawings, specifications, and appropriate procedures.
13. Coordinates the implementation and maintenance of radiological environmental surveillance programs concerning radioactive effluents from the plant.
14. Supports the implementation and maintenance of the Emergency Plan pursuant to state and federal regulatory requirements.
15. Provides for the radiological and environmental engineering requirements necessary to support changes related to the plant decommissioning.
16. Provides support of spent fuel storage activities at the Yankee site.

## YANKEE ATOMIC ELECTRIC COMPANY

### b. ~~Plant Superintendent~~

1. ~~Reports directly to the Decommissioning Manager.~~
2. ~~Directly responsible for the safe, orderly, and efficient operation of the Site for compliance with the requirements of the license and applicable State and Federal laws and regulations.~~
3. ~~Responsible for shift supervisors and operations support.~~
4. ~~Administration of the Certified Fuel Handlers Training Program.~~
5. ~~Administration of the Equipment Operators Training Program.~~
6. ~~Coordinates Plant Quality Assurance activities with the Decommissioning Manager.~~
7. ~~Responsible for security, maintenance, operations, technical services, including the Security and Fire Protection Programs.~~
8. ~~Coordinates Plant Fire Protection activities, including Fire Protection Training.~~
9. ~~Acts as Chairman of the Plant Operations Review Committee with authority and responsibility as established in the Technical Specifications of the site license.~~
10. ~~Maintains core component history file of all fuel, control rods, sources and incore detectors.~~
11. ~~Responsible for the control and surveillance of all special nuclear material at the plant site.~~
12. ~~Responsible for site maintenance and repair.~~
13. ~~Directs the activities of Operations, Maintenance, and Security.~~

### c. ~~Shift Supervisors~~

1. ~~Reports directly to the Operations Supervisor, who reports to the Plant Superintendent.~~
2. ~~Responsible for plant operations and decommissioning activities in accordance with approved documents and specifications.~~
3. ~~Responsible for ensuring that personnel under their supervision perform their duties according to applicable licenses, specifications, safety rules, regulations, and certifications.~~



## YANKEE ATOMIC ELECTRIC COMPANY

4. — Responsible for ensuring that maintenance requests are provided for the repair or replacement of defective parts and/or components.
5. — Responsible for verifying the operability of systems and/or components following maintenance or changes by providing for the performance of written test documents which incorporate the requirements and acceptance criteria contained in applicable design documents.
6. — Responsible for ensuring that fuel handling operations are safely performed in accordance with approved procedures.
7. — Responsible for coordination and performance of hydrotesting.

### d. — Construction Manager

1. — Reports directly to the Decommissioning Manager.
2. — Coordinates the review and update of plant drawings and specifications.
3. — Directs plant design changes and assures compliance with applicable State, Federal, and license requirements.
4. — Prescribes and directs schedules, and programs, as necessary, to assure the safe decommissioning of the site.
5. — Provides for major contractor decommissioning support including establishment of appropriate contractual arrangements.
6. — Ensures that contractor decommissioning activities are performed in a safe manner.
7. — Directs on-site engineering and craft support of decommissioning activities.
8. — Coordinates and transmits information concerning Plant changes to the Decommissioning Manager.

### e. — Training Coordinator

1. — Reports directly to the Decommissioning Manager.
2. — Responsible for scheduling and documentation of plant general employee training.
3. — Responsible for administration of all plant staff training.
4. — Ensures that all personnel are provided with both the technical and professional skills required for decommissioning activities.

## YANKEE ATOMIC ELECTRIC COMPANY

5. Provides training needs assessments to ensure that organizationally relevant training is provided.
  6. Conducts training evaluations to determine when desired objectives are obtained.
  7. Assures the training, qualification, and requalification of personnel in nondestructive testing, such as liquid penetrant examination, is performed.
  8. Provides for the administration of the NDE/ANSI N45.2.6 Training and Certification Programs. (To maintain the independence of the NDE/ANSI N45.2.6 training and certification process, overall responsibility for appointing the NDE/ANSI N45.2.6 Level III Examiner will remain with the Executive Director of Quality Assurance. All requirements for certification shall be met prior to appointment as Level III Examiner.)
- f. Site Services Supervisor
1. Reports directly to the Decommissioning Manager.
  2. Supervises the Stores Supervisor.
    - a) Preparation of requisition for purchase orders.
    - b) The receipt, handling, and storage of materials and equipment.
    - c) Administering a system of material and equipment identification.
    - d) Maintaining a system which provides traceability and retrievability of Quality Assurance documentation for purchased materials.
  3. Coordinates the review, revision, and distribution of procedures.
  4. Responsible for the operations of the Plant Document Control Center for the retention of specified Quality Assurance records, reports, and personnel records.
  5. Maintains and disseminates information regarding codes, criteria, standards, guidelines, and policy to applicable plant personnel.
  6. Supervises Plant Administrative personnel.
  7. Responsible for the Fitness for Duty Program.

## YANKEE ATOMIC ELECTRIC COMPANY

### ~~g. Radiation Protection and Chemistry Manager~~

- ~~1. Reports directly to the Decommissioning Manager.~~
- ~~2. Directs maintenance of water conditioning where required on the site as per specifications and/or documented and authorized recommendations.~~
- ~~3. Has direct access to the Plant Superintendent for matters relating to radiological health and safety of employees and the public.~~
- ~~4. Directs a program to ascertain the radioactivity levels of liquids, gases and solids as required.~~
- ~~5. Directs the review and interpretation of chemistry test results.~~
- ~~6. Directs the documentation and maintenance of chemistry and radiation protection records.~~
- ~~7. Responsible for the development and implementation of the Radiation Protection Program (including ALARA for decommissioning activities), assuring that these programs meet site standards and State and Federal license requirements.~~
- ~~8. Directs the maintenance of the Personnel Exposure Record System.~~
- ~~9. Directs radioactive material shipments and receipts pursuant to site and government regulations.~~
- ~~10. Maintain stop work authority when radiological safety is jeopardized or when unnecessary personnel exposure is occurring.~~
- ~~11. Assures coordination and implementation of the Emergency Plan.~~
- ~~12. Provides for the radiochemical processing of environmental, effluent, and waste samples.~~
- ~~13. Provides for the processing and internal dosimetric evaluation of bioassay samples.~~
- ~~14. Provides for the routine in situ measurements in support of environmental Technical Specifications as well as ad hoc emergency response in situ measurements or emergency response laboratory sample measurements.~~



## YANKEE ATOMIC ELECTRIC COMPANY

15. ~~Provides and coordinates technical quality assurance programs in the areas of plant chemistry (radiological only) and whole body counting.~~
16. ~~Provides for the processing of personnel, extremity, and environmental dosimetry needed to support NRC and plant radiological assessment requirements.~~
17. ~~Directs the final status survey program implementation.~~

### ~~h. Health and Safety Manager~~

1. ~~Reports directly to the Decommissioning Manager.~~
2. ~~Directs the plant Medical Services Program and acts a plant management's point of contact relative to medical matters in coordination with the Plant Medical Consultant.~~
3. ~~Directs the maintenance of personnel medical records.~~
4. ~~Responsible for the development and implementation of the plant Occupational Safety programs, assuring that these programs meet site standards and Federal OSHA requirements.~~
5. ~~Responsible for review and communication of plant safety policies through the plant safety manual and safety meetings.~~
6. ~~Responsible for work site inspections by safety department personnel.~~
7. ~~Acts to safeguard worker health and safety.~~
8. ~~Directs the review and interpretation of occupational safety exposure monitoring.~~

### 1. Chairman, Chief Executive Officer and President

The Chairman, Chief Executive Officer (CEO), and President reports to the YAEC Board of Directors. This individual has overall responsibility for the development and implementation of the DQAP, while ensuring an organization is established to ensure the effective implementation of the program. The Chairman, CEO, and President has delegated the necessary authority and has assigned responsibility for implementation of the DQAP for the Yankee Nuclear Power Company to the Decommissioning Manager. The Decommissioning Quality Assurance Manager under the cognizance of the Oversight Manager has assigned responsibility for the development of the DQAP and oversight of its implementation.

## YANKEE ATOMIC ELECTRIC COMPANY

### 2. Decommissioning Manager

The Decommissioning Manager acts as the Site Manager as defined in the Final Safety Analysis Report. The Decommissioning Manager has responsibility for providing the overall implementation of the DQAP and in providing support services to the operating staff. The Decommissioning Manager is responsible for the safe operation of facility systems, structures, and components and for providing support activities necessary for safe operation, maintenance, and decommissioning of the plant. The Decommissioning Manager is responsible for the administration of Engineering, Licensing, Health and Safety, Construction, Site Services, Radiation Protection, Training, Chemistry, and Radioactive Waste. The responsibility for plant operational activities is delegated to the Plant Superintendent.

### 3. Plant Superintendent

The Plant Superintendent reports to the Decommissioning Manager, and is responsible for the direction and administration of the Operations, Maintenance, and Security of the plant.

### 4. Oversight Manager

The Oversight Manager reports to the Chairman, CEO, and President and is responsible for overview of the Quality Assurance Organization. This individual is also responsible for providing oversight of the development, implementation, and maintenance of the DQAP and implementing procedures. The Oversight Manager provides for review and evaluation of compliance with state and federal regulatory requirements for nuclear power facilities. This individual ensures that the Quality Assurance Organization has sufficient organizational freedom and authority to identify problems, to initiate, recommend or provide solutions and to verify implementation of solutions.

### 5. Decommissioning Quality Assurance Manager

The Decommissioning Quality Assurance Manager reports to the Oversight Manager and is responsible for directing and administering the audit, surveillance and inspection activities performed by the Quality Assurance Organization. This individual is responsible for the verification of compliance with the DQAP; Licensing Requirements; 10CFR50, Appendix B; 10CFR71, Subpart H; 10CFR72, Subpart G; and other regulatory requirements. The Decommissioning Quality Assurance Manager is also responsible for maintaining the DQAP current and has the authority to stop unsatisfactory work.

## YANKEE ATOMIC ELECTRIC COMPANY

### 6. Independent Review Committee

An Independent Review Committee is responsible for those activities defined in Section 6 of the Technical Specifications. Section 6 also defines the functional reporting requirements.

### **~~E. REVIEW AND AUDIT~~**

~~Two committees have been established for the plant whose objectives are to ensure the plant is decommissioned in a safe manner, utilizing good engineering and safe fuel storage practices. The committees are charged with making recommendations to modify decommissioning and spent fuel storage methods or safety precautions.~~

~~The Plant Operations Review Committee (PORC) is composed of a chairman and a minimum of four management/supervisory staff members who are appointed, in writing, by the Plant Superintendent. The staff includes contractor personnel. The Nuclear Safety Audit and Review Committee (NSARC) is composed of a chairman and a minimum of four members who are appointed by the Manager of Operations. NSAR Committee members shall not be members of the plant staff.~~

#### **~~1. Plant Operations Review Committee~~**

~~See Section 6.5.1, "Plant Operations Review Committee" of the Yankee Defueled Technical Specifications to the Possession Only License DPR-3.~~

#### **~~2. Nuclear Safety Audit and Review Committee~~**

~~See Section 6.5.2 "NSARC", of the Yankee Defueled Technical Specifications to the Possession Only License DPR-3.~~



# YANKEE ATOMIC ELECTRIC COMPANY



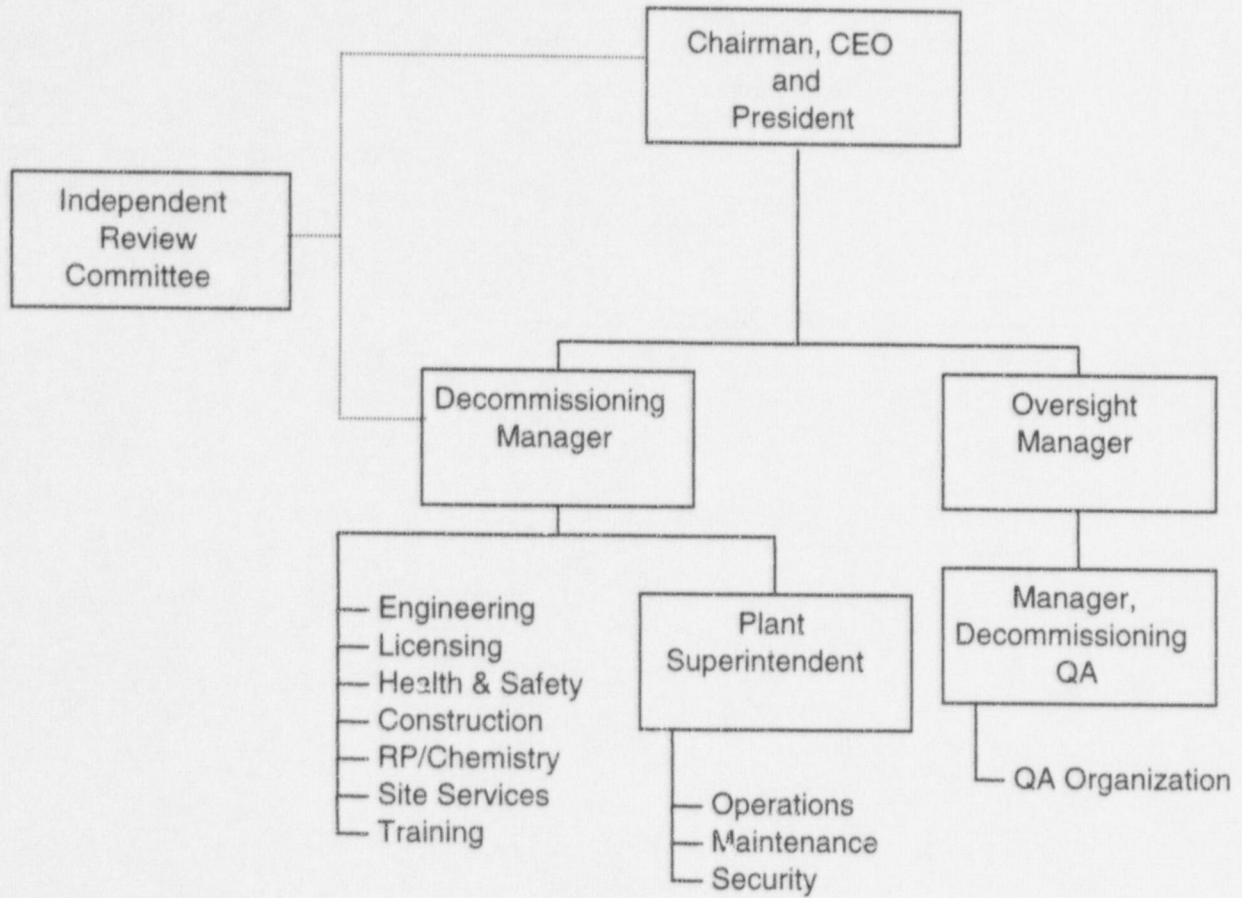
\* Contracted to DE&S or other approved contractors.

# Functional positions described in the DQAP.

cdlbouassa/yankee.org/chart

# YANKEE ATOMIC ELECTRIC COMPANY

## Organization Chart



———— Functional  
..... See Technical Specification 6.0

## YANKEE ATOMIC ELECTRIC COMPANY

### II. QUALITY ASSURANCE PROGRAM

#### A. SCOPE

This section establishes the criteria to be applied to the structures, systems, and components requiring Quality Assurance which prevent or mitigate the consequences of postulated accidents which could cause undue risk to the health and safety of the public. These structures, systems, and components and other items requiring quality assurance are listed in the Yankee Safety Classification of Systems Manual Appendix C.

#### B. RESPONSIBILITIES

1. Compliance with the requirements of the Decommissioning Quality Assurance Program - based on the criteria of Title 10CFR of the Code of Federal Regulations, Part 50, Appendix B, which satisfies: 10CFR71, Subpart H; and 10CFR72, Subpart G, and ANSI N18.7-1976 shall be the responsibility of all personnel involved with quality activities affecting decommissioning and spent fuel storage safety. The facility shall have a matrix of major quality assurance procedures cross referenced to each applicable criteria of 10CFR50 Appendix B. The performance of quality-related activities shall be accomplished with specified appropriate equipment under suitable environmental conditions.

Note: Each criteria section for of the Program incorporates the designation of specific organizational responsibilities.

2. Individuals having overall direct responsibilities for the establishment/distribution control and implementation of the Decommissioning Quality Assurance Program DQAP are delineated in Section I "Organization" of the Program.
3. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

#### C. IMPLEMENTATION

Establishment of an effective Decommissioning and Spent Fuel Storage Quality Assurance Program is assured through consideration implementation of 10CFR50, Appendix B, which satisfies the requirements of 10CFR71, Subpart H; and 10CFR72, Subpart G, as applied to those systems, structures, and components important to safety. Programs and/or procedures are developed to implement the DQAP. The following and conformance with the Regulatory positions in the below listed Regulatory Guides and ANSI Standards are utilized to meet the applicable requirements as modified in Appendix B. Implementation of this Program is assured through Quality Assurance and the applicable procedures derived from Quality Assurance policies, goals and objectives. The



## YANKEE ATOMIC ELECTRIC COMPANY

Quality Assurance ~~Department~~ Organization shall review Quality Assurance ~~P~~rogram procedures to assure their derivation from the policies, goals and objectives established by the Chairman, CEO and President.

1. Title 10 of the Code of Federal Regulations, Part 50-10CFR50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants
- \* 2. ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.33, Revision 2)
3. ~~ANSI N45.2.1-1973, Cleaning of Fluid Systems and Associated Components During Construction Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.37, March 16, 1973)~~
- \* 4. 3. ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (Endorsed by Regulatory Guide 1.38, Revision 2)
- \* 5. 4. ANSI N45.2.3-1973, Housekeeping During the Construction Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.39, Revision 2)
6. ~~ANSI N45.2.4-1972, Installation, Inspection and Testing Requirements for Instrumentation and Electric Equipment During the Construction of Nuclear Power Generation Plants (Endorsed by Regulatory Guide 1.30, August 11, 1972)~~
7. 5. ANSI N45.2.5-1974, Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.94, Revision 1)
- \* 8. 6. ANSI N45.2.6-1978, Qualification of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.58, Revision 1)
9. ~~ANSI N45.2.8-1975, Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.116, Revision 0 R)~~
- \* 10. 7. ANSI N45.2.9-1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants (Endorsed by Regulatory Guide 1.88, Revision 2)
- \* 11. 8. ANSI N45.2.10-1973, Quality Assurance Terms and Definitions

Title: Section ii, Quality Assurance Program  
Page: 2 of 4  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999

## YANKEE ATOMIC ELECTRIC COMPANY

- 42-9. ANSI N45.2.11-1974, Quality Assurance Requirements for the Design of Nuclear Power Plants (Endorsed by Regulatory Guide 1.64, Revision 2)
- 43-10. ANSI N45.2.12-1977, Requirements for Auditing of Quality Assurance Program for Nuclear Power Plants (Endorsed by Regulatory Guide 1.144, Revision 1)
- 44-11. ANSI N45.2.13-1976, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants (Endorsed by Regulatory Guide 1.123, Revision 1)
- 45-12. ANSI N45.2.23-1978, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants (Endorsed by Regulatory Guide 1.146, August 1980)
- 46-13. ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel (Endorsed by Regulatory Guide 1.8, Revision 1-R)
- 47-14. Regulatory Guide 1.26, Revision 3, Quality Group Classifications and Standards for Water-, Steam, and Radioactive-Waste-Containing Components of Nuclear Power Plants
- 48- Regulatory Guide 1.29, Revision 3, Seismic Design Classification

- Notes:
- 1) When conflicts in similar requirements contained in Technical Specifications and the above documents exist, the requirements contained in Technical Specifications override those in the documents. Requirements in the documents will be considered when they supplement and are not in conflict with similar requirements in Technical Specifications.
  - 2) Revisions to the above listed documents will be considered for applicability to the Yankee Decommissioning Quality Assurance Program upon written direction thereof by the Regional Administrator, Nuclear Regulatory Commission - Office of Inspection and Enforcement - Region I.
  - 3) Only those documents listed above shall be considered applicable to the Yankee plant. Documents further referenced by the above listed documents shall not be considered applicable. They may, however, be considered as guidelines.

\*Exceptions and alternatives to the provisions contained in this Standard/Guide are detailed in Appendix B.

## YANKEE ATOMIC ELECTRIC COMPANY

- 4) This Program shall be applicable to those activities requiring quality assurance which occur commencing within 90 days after acceptance of the Program by the Nuclear Regulatory Commission.
- 5) The NRC shall be notified of changes, that reduce commitments in the accepted description of the ~~Decommissioning QA program~~ DQAP, for their review and acceptance prior to implementation. Acceptance will be assumed 60 days after submittal unless notified otherwise. A previously approved NRC SER may be used to make changes which reduce commitments under the same approval conditions.
- 6) Changes that do not reduce ~~Decommissioning QA program~~ DQAP commitments or were made based on previously approved NRC SER shall be submitted to the NRC at least annually.
- 7) Editorial changes or personnel reassignments of a nonsubstantive nature do not require NRC notification.

### D. MANAGEMENT EVALUATION

The ~~President and Chief Executive Officer~~ Chairman, CEO and President ensures the performance of periodic ~~directs a thorough~~ evaluations of the established ~~Decommissioning Quality Assurance Program~~ DQAP, by assigning the Nuclear Safety Audit and Review Committee the task of reviewing for ~~The review is performed to~~ evaluate compliance with the DQAP and to evaluating ~~the its~~ effectiveness of quality related activities.

### E. TRAINING

~~4. The Decommissioning Manager is responsible for the indoctrination and training of his/her staffs personnel involved with DQAP activities affecting quality during plant decommissioning and spent fuel storage and/or license commitments.~~

~~2. The Training Coordinator is responsible for indoctrination and training of site staff personnel performing activities affecting license requirements.~~

~~3. These indoctrination and training programs shall provide~~ include the following:

~~a. 1.~~ 1. Instruction as to the purpose, scope, and implementation of applicable quality-related manuals, instructions, and procedures.

~~b. 2.~~ 2. Training and qualification in the principles and techniques of the activity being performed.



YANKEE ATOMIC ELECTRIC COMPANY

3. Documentation of the training implementation.

~~c. Documentation of the scope, objective, and method of implementing the program.~~

~~d.4. Maintenance of personnel proficiency by retraining, re-examining, and/or recertifying.~~

~~e. Documentation of the training sessions including content, attendance, dates, and results where applicable.~~

## YANKEE ATOMIC ELECTRIC COMPANY

### III. DESIGN CONTROL

#### A. SCOPE

This section of the ~~Decommissioning Quality Assurance Program~~DQAP establishes measures to assure that the design of and changes to structures, systems, and components (SSCs) covered by the ~~Decommissioning Quality Assurance Program~~DQAP are controlled.

#### B. RESPONSIBILITIES

1. ~~The Quality Assurance Department shall be responsible for auditing design documents and engineering specifications to verify that quality requirements, such as inspection requirements and acceptance criteria, have been included by the responsible parties.~~ Design activities associated with applicable SSCs have been delegated to Duke Engineering & Services (DE&S). DE&S shall provide for:

2. ~~The Engineering Manager shall be responsible for:~~

- a. ~~The control design and control of design activities (including design interfaces) for the change of applicable~~ structures, systems, or components, including the requirement for independent review. This ~~NRC mandated review~~ shall be performed by an uninvolved, but technically knowledgeable, person in the engineering discipline.
- b. Identification, documentation, and control of deviations from specified design requirements and/or quality standards.
- c. Design analysis and delineation of acceptance criteria for inspections and tests when required.
- d. Verification of the adequacy of a specific design feature by implementation of a prototype test when required.
- e. Review of inspection and test data for compliance with established engineering criteria when required.

- 3.2. ~~The Plant Operations Independent Review Committee activities shall be responsible for performed in accordance with Section 6 of the Defueled Technical Specifications as required.~~

## YANKEE ATOMIC ELECTRIC COMPANY

- a. ~~Review of all proposed plant changes and recommending their approval or disapproval to the Plant Superintendent.~~
- b. ~~Determination of whether proposed changes involve unreviewed safety questions.~~
- 4. ~~The Plant Superintendent shall be responsible for:~~
  - a. ~~Review of the recommendations of the Plant Operations Review Committee.~~
  - b. ~~Review and approval of proposed plant changes.~~
- 5. ~~The Nuclear Safety Audit and Review Committee shall be responsible for the review of plant changes.~~
- 3. ~~3. The Decommissioning Manager shall be responsible for ensuring the appropriate review and approval of proposed plant changes.~~
- 4. ~~The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.~~

### C. IMPLEMENTATION

- 6. ~~The (Decommissioning Manager) and staff shall be responsible for:~~
  - a. ~~Approval of procedures for processing plant design changes and engineering design changes.~~
  - b. ~~Review, approval and distribution of plant change documents.~~
- 7. ~~The Engineering Manager shall be responsible for the distribution of design change documents to the contractor performing the work where contract administration responsibilities have been assigned.~~
- 4. ~~Satisfaction of this criterion shall be assured through the implementation of the actions listed below:~~
  - a. ~~1. Correct translation of applicable regulatory requirements and design bases into specifications, drawings and written documents.~~
  - b. ~~2. Application of suitable design controls to such activities as reactor physics; seismic, stress, thermal, hydraulic, radiation, and accident analyses; compatibility of materials; and accessibility for inservice inspection, maintenance and repair.~~



## YANKEE ATOMIC ELECTRIC COMPANY

c.3. Design reviews to assure that design characteristics can be controlled, inspected and tested.

d.4. Performance of proper selection and accomplishment of design verification or checking process such as design reviews, alternate calculations, qualification testing or test programs. When a test program is used to verify the adequacy of a design, a qualification test of a prototype unit under the most adverse design conditions shall be used. The responsibilities and qualifications of the verifier, the areas and features to be verified, the pertinent considerations to be verified, and the extent of documentation are identified in procedures.

~~Procedures will provide~~ The criteria that specify when verification should be performed by test will be provided. If the verification method is by test only, prototype, component, or feature testing is performed in accordance with written procedures prior to relying upon the component, system, or structure to perform its function.

e.5. Subjection of design and specification changes, ~~including those originating "on-site"~~, to the same design controls and approvals that were applicable to the original design unless ~~designated~~ deligated in writing to another responsible organization.

f.6. ~~Documentation~~ Documenting of errors and deficiencies in the design process that adversely affect safety-related classified structures, systems, and components and the performance of corrective action to preclude repetition.

g.7. Review of standard "off-the-shelf" commercial or previously approved materials, parts, and equipment that are essential to the ~~safety~~ quality functions of structures, systems, and components, for suitability of application prior to selection.

h.8. Selection of suitable materials, parts, equipment, and processes for safety quality classified structures, systems, and components.

i.9. Establishment of procedures to assure that computer programs are verified and validated for a particular application.

## YANKEE ATOMIC ELECTRIC COMPANY

### IV. PROCUREMENT DOCUMENT CONTROL

#### A. SCOPE

This section of the ~~Decommissioning Quality Assurance Program~~ DQAP establishes the measures necessary to assure that applicable regulatory requirements, design bases and other requirements which are necessary to assure adequate quality, are suitably included or referenced in the documents for procurement of material, equipment and services.

#### B. RESPONSIBILITIES

1. ~~The Quality Assurance Department shall be responsible for review of procurement requisitions initiated by the Plant.~~ This activity has been delegated to DE&S (approved vendor). DE&S shall provide for:
2. ~~The Plant or the Engineering Manager shall be responsible for:~~
  - a. ~~The preparation, review, issue, and control of purchase documents.~~
  - b-a. The pPreparation of detailed procedures as to how purchase documents are prepared, reviewed, approved, issued, and controlled.
  - b. The integration of appropriate quality assurance requirements into procurement requisitions.
- 3.2. ~~The Engineering Decommissioning Manager Department shall be responsible for ensuring:~~
  - a. The pPreparation of engineering specifications which detail the technical and quality requirements for material, equipment and services.
  - b. The periodic review of purchasing documentation for material, equipment, and services required to support applicable plant changes.
3. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

## YANKEE ATOMIC ELECTRIC COMPANY

~~b. Initiation and/or review of purchase documentation for material, equipment, and services required for Plant changes.~~

~~4. The Plant/Engineering Manager shall be responsible for initiation and/or review of purchase documentation for construction services including contractor supplied material and equipment required for plant changes where contract administration responsibilities have been assigned.~~

~~5. The Decommissioning and staff shall be responsible for the review and approval of procurement documents.~~

### C. IMPLEMENTATION

4. Satisfaction of the criterion shall be assured through the implementation of the actions listed below:

a. 1. Documentation of the review and approval of procurement documents prior to release and maintain availability of this documentation for verification.

b. 2. Identification of the vendor's applicable quality assurance requirements of 10CFR50, Appendix B and/or ANSI N18.7, and/or other applicable codes, standards or regulatory documents referenced in procurement documents which are to be reviewed by the qualified personnel knowledgeable in decommissioning quality assurance.

c. 3. Identification in the procurement documents of the applicable documentation to be prepared, maintained, and/or submitted to the purchaser prior to ~~use~~purchase, such as:

1-a. Drawings, specifications, procedures;

2-b. Inspection and fabrication plans;

3-c. Inspection and test records;

4-d. Personnel and procedure qualifications;

5-e. Chemical and physical test results of material; and

6-f. ~~Quality Assurance Department's~~ The Right of the access to the vendor's facilities and records for surveillance and/or audit ~~to of~~ procurement documentation.



YANKEE ATOMIC ELECTRIC COMPANY

- d-4. \_\_\_\_\_ Review and approval of changes and revisions to procurement documents at least equivalent to those for the original document.
- e-5. \_\_\_\_\_ Control of procurement documents for spare and replacement parts at least equivalent to that used for the original equipment.

## YANKEE ATOMIC ELECTRIC COMPANY

### V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS

#### A. SCOPE

This section of the ~~Decommissioning Quality Assurance Program~~ DQAP establishes the measures for prescribing and accomplishing activities requiring quality assurance in accordance with approved drawings, instructions, or procedures.

#### B. RESPONSIBILITIES

1. ~~Each Department Director/The Decommissioning Manager/Supervisor~~ is responsible for ~~ensuring establishing and complying with~~ applicable procedures governing the activities affecting quality are established and followed.

2. ~~Persons preparing and approving documents~~ are responsible for assuring that specifications, instructions, procedures, and drawings include appropriate quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished; assuring that the applicable criteria of 10CFR50, Appendix B; which satisfies the requirements of 10CFR71, Subpart H; and 10CFR72, Subpart G and/or ANSI N18.7 are specified; and assuring that the documents are kept current. In addition, the following departments have the distinct responsibilities delineated below.

~~1. The Quality Assurance Department shall be responsible for review of all Plant Quality Assurance procedures.~~

2-a. ~~The Plant Decommissioning Manager~~ shall be responsible for ensuring the preparation, approval, maintenance, and implementation of all instructions, drawings, and procedures associated with plant and contracted service and activities.

~~3. The Engineering Manager shall be responsible for:~~

~~a. Preparation and approval of engineering drawings and instructions, welding and nondestructive examination procedures, and procedures for Engineering Design Control.~~

~~b. Updating and control of original drawings and distribution of copies thereof.~~

4-b. ~~The Plant Operations Review Committee shall be responsible for reviewing. An independent review committee shall be responsible for reviewing those items defined in the Defueled Technical~~

## YANKEE ATOMIC ELECTRIC COMPANY

Specifications procedures affecting nuclear safety prior to their approval by the Plant Superintendent.

3. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

1. Establishment of provisions which clearly delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of instructions, procedures, and drawings.
2. Review of quality inspection plans; test, calibration, special process, maintenance and repair procedures; drawings and specifications; and changes thereto by the Quality Assurance Department or other personnel knowledgeable personnel in decommissioning quality assurance.



## YANKEE ATOMIC ELECTRIC COMPANY

### VI. DOCUMENT CONTROL

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes the measures for controlling the issuance of documents, including revisions thereto, which affect quality activities.

#### B. RESPONSIBILITIES

1. ~~All participating departments~~ The Decommissioning Manager shall ensure  
~~establish document control measures are established~~ which provide for the  
following:
  - a. Identification of controlled documents utilized for performing quality activities.
  - a.b. Identification of organizations responsible for preparation, review, approval, and control of documents.
  - b. ~~b. Identification of documentation to be used in performing the activity.~~
  - c. Coordination and control of interface documents.
  - d. Establishment of distribution lists.
  - e. Action to be taken for obsolete or superseded documents.
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

#### C. IMPLEMENTATION

~~In addition, the following organizations have the unique responsibilities define below.~~

~~2. The Plant shall be responsible for:~~

~~a. Controlling the issuance of plant operating, maintenance, repair, fuel movements, inspection and test, and change documents.~~

~~b. Distribution and maintenance of all plant approved and/or revised documents assuring quality at the location where the activity is performed.~~

YANKEE ATOMIC ELECTRIC COMPANY

~~c. Review and distribution of Plant drawings.~~

~~3. The Engineering Manager shall be responsible for:~~

~~a. Controlling the issuance of engineering drawings, specifications, welding and nondestructive examination documents.~~

~~b. Revision and distribution of welding and nondestructive examination documents.~~

~~c. Maintenance and distribution of engineering specifications and drawings.~~

~~4. The Decommissioning Manager and staff shall be responsible for:~~

~~a. A system of review and approval of Plant drawings and specifications.~~

~~b. Controlling the Decommissioning Support quality assurance documents.~~

~~5. The Director of Quality Assurance shall be responsible for establishing the means for the control and distribution of the Decommissioning Quality Assurance Program and Approved Vendors List and revisions thereto.~~

4. Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

a-1. \_\_\_\_\_ Review and approval of document changes by the same "effected" organizations that performed the original review and approval or by other responsible organizations delegated by the controlling authority.

b-2. \_\_\_\_\_ Inclusion of approved changes in instructions, drawings, and other applicable documents prior to placing the system in operating status.

c-3. \_\_\_\_\_ Provision ~~of to allow~~ availability of documents, as needed, at the location where the activity is to be performed prior to commencing the work.

d-4. \_\_\_\_\_ Establishment, revision, and distribution of a master list or equivalent to identify the current revision number of instructions, specifications, drawings, procurement documents, or other quality assuring documents. (Cancelled procedures are not required for inclusion within the list.)

e-5. \_\_\_\_\_ Control of documents as identified in administrative procedures.

1. Design documents (i.e., Engineering Design Change Requests, Specifications, Calculations, etc.);

YANKEE ATOMIC ELECTRIC COMPANY

~~2. Design, manufacturing, construction, installation and decommissioning drawings;~~

~~3. Procurement documents;~~

~~4. Decommissioning Quality Assurance Program, maintenance, and decommissioning procedures;~~

~~5. Manufacturing, inspection and test instructions;~~

~~6. Test documents;~~

~~7. Design changes; and~~

~~8. Nonconformance reports.~~

~~6.~~ Appendices to the Decommissioning Quality Assurance Program are considered to be part of the Program and are reviewed and approved in accordance with the Program.



## YANKEE ATOMIC ELECTRIC COMPANY

### VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

#### A. SCOPE

This section of the ~~Decommissioning Quality Assurance Program~~ DQAP establishes measures to assure that purchased material, equipment and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents.

#### B. RESPONSIBILITIES

1. The Quality Assurance ~~Department~~ Organization shall be responsible for:
  - a. Audits and Commercial Surveys of vendor quality assurance programs.
  - b. Surveillances of vendor activities.
  - c. Maintenance of an approved ~~the Yankee Atomic Electric Company~~ Approved vendors list.
  - d. Audits and/or surveillance of the implementation of this DQAP criteria.
2. ~~The Quality Assurance Department/Engineering Manager shall be responsible for evaluating vendor manufacturing and technical capabilities upon request.~~
- 3-2. The Plant Decommissioning Manager shall be responsible for ensure that provisions have been established for the:
  - a. Receipt inspection and control of material and equipment.
  - b. Evaluation of purchased services during and/or after completion of the service.
  - c. ~~The Plant Site Services Department shall be responsible for the e~~Control of purchased material, parts and components until issued for installation or use.

#### C. IMPLEMENTATION

- 4-~~Satisfaction of this criterion shall be assured through the implementation of the actions listed below:~~
- a-1. Audits and Commercial Surveys of vendors based on one or more of the following, as appropriate to the scope of procurement activities:

## YANKEE ATOMIC ELECTRIC COMPANY

4-a. When required in order to verify vendor capabilities to comply with the applicable criteria of 10CFR50, Appendix B, which satisfies the requirements of 10CFR71, Subpart H; 10CFR72, Subpart G; ANSI N18.7, or other quality program baselines.

2-b. When required, based on the results of a review and evaluation of vendor performance history.

3-c. When required in order to observe vendor facilities/service activities to assure conformance to purchase specifications.

b-2. Surveillances of vendors which provide for:

4-a. Specification of applicable quality controls, processes to be witnessed or verified, documentation required, and personnel responsible for performing the surveillance.

2-b. Verification that the vendor complies with the quality requirements specified in procurement documents by observation of in-process work.

e-3. Transfer of the following records from the vendor to the plant:

4-a. Documentation that identifies the purchased material/services and compliance with the applicable procurement document requirements.

2-b. Documentation that identifies any deviation(s) from procurement requirements, including a description of those deviations dispositioned "accept as is" or "repair".

d-4. Review and acceptance of vendor documentation by a responsible quality assurance qualified individual.

e-5. Receipt inspections of vendor furnished material/services, in accordance with predetermined instructions, to assure:

~~1. Material is identified and conforms with receiving documentation.~~

~~2. Material and documentation are determined acceptable prior to use.~~

~~3. Inspection records or certificates of conformance attesting to material acceptability are on-site prior to use.~~

~~4. Items are identified as to their inspection status prior to release for controlled storage, installation or further work.~~

YANKEE ATOMIC ELECTRIC COMPANY

f-6. \_\_\_\_\_ Evaluations of vendor effectiveness to control quality is performed at intervals consistent with the importance, complexity and quality of the item/services.

Title: Section VII, Control of Purchased Material, Equipment, and Services  
Page: 3 of 2  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999



## YANKEE ATOMIC ELECTRIC COMPANY

### VIII. IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS

#### A. SCOPE

This section of the ~~Decommissioning Quality Assurance Program~~ DQAP establishes the measures for identification and control necessary to prevent the use of incorrect or defective material, parts, and components.

#### B. RESPONSIBILITIES

1. The Quality Assurance ~~Department~~ Organization shall be responsible for review, evaluation, or verification (audit, commercial survey or surveillance) of vendor quality controls and work processes for traceability of materials through the use of heat number, part number, or serial number, either on the item or on records traceable to the items.
2. The Plant shall be responsible for:
  - a. ~~Preparation and approving~~ Preparation and approving of documents for the identification and control of materials, parts, and components ~~and storage of lubricants and other consumable materials.~~
  - b. ~~Maintaining~~ Maintaining ~~traceability~~ traceability of materials, parts, and components which received, stored, installed, and used at the Plant.
3. The ~~Engineering~~ Decommissioning Manager shall be responsible for:
  - a. Assuring that specifications contain appropriate requirements for the identification and control of materials, parts, and components.
  - 4-b. ~~The Decommissioning Manager and staff shall be responsible for~~ Providing review and approval of documentation for the purchase of materials, parts, and components.
4. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

#### C. IMPLEMENTATION

4-Satisfaction of this criterion shall be assured through the implementation of the applicable actions listed below:

- a-1. Traceability of the identification of materials and parts to the appropriate documentation such as drawings, specifications, purchase orders, manufacturing

**YANKEE ATOMIC ELECTRIC COMPANY**

and inspection documents, deviation reports, and Physical and Chemical Material Test Reports.

~~b-2.~~ Identification of the item in a location and with a method which does not affect its fit, function or quality.

~~e-3.~~ Documented verification of correct identification of materials, parts, and components prior to release for use.

## YANKEE ATOMIC ELECTRIC COMPANY

### IX. CONTROL OF SPECIAL PROCESSES

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes the measures necessary to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel in accordance with applicable codes, standards, specifications, criteria and other special requirements.

#### B. RESPONSIBILITIES

~~1. The Quality Assurance Department shall be responsible for:~~

~~a. Surveillance of certain nondestructive tests in accordance with "Yankee Atomic Electric Company Welding and Nondestructive Examination Procedures";~~

~~b. Review of special process documents, as requested, generated by the Engineering/Project Departments and vendors for use on site and when otherwise specified.~~

~~2.1. The Engineering Decommissioning Manager shall be responsible for ensure the following:~~

~~a. Preparation and implementation of documents for welding, heat treating, filler metal control, and nondestructive examinations.~~

~~b. Review and approval of special process documents provided by the vendor for use on-site and when otherwise specified.~~

~~3. The Plant shall be responsible for:~~

~~a-c. Assurance that maintenance and change work involving special processes are performed by qualified personnel in accordance with approved documents.~~

~~b-d. Control of material used in special processes by plant personnel.~~

~~e-e. Training, qualification, and requalification of personnel in nondestructive testing, such as liquid penetrant examination.~~

2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.



## YANKEE ATOMIC ELECTRIC COMPANY

~~4. The Decommissioning Manager and staff shall be responsible for review and approval of purchase documentation for special process material.~~

### C. IMPLEMENTATION

~~4.~~ Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

~~a.~~ 1. \_\_\_\_\_ Completion of qualification records of documents, equipment, and personnel connected with special processes in accordance with applicable codes, standards, and specifications.

~~b.~~ 2. \_\_\_\_\_ Performance of special processes accomplished in accordance with written process sheets or equivalent with recorded evidence of verification.

~~c.~~ 3. \_\_\_\_\_ Maintenance and updating of qualification records of special process documents, equipment, and personnel.

## YANKEE ATOMIC ELECTRIC COMPANY

### X. INSPECTION

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes measures for inspection of activities requiring quality assurance to verify conformance with approved procedures, drawings, specifications and instructions.

#### B. RESPONSIBILITIES

1. The Quality Assurance ~~Department~~ Organization shall be responsible for:
  - a. Surveillance of vendor inspection activities and personnel.
  - b. ~~Review of Installation and Test Procedures and Maintenance Requests to ascertain the extent of any required QA surveillances and QC inspections.~~
  - e-b. Incorporation of mandatory notification/hold points for plant/vendor/service group activities into the QA surveillances and mandatory hold points for inspections.
  - e-c. Writing, reviewing and approving quality control inspection checklists.
  - e-d. Performing independent QC inspection, when necessary, activities to assure that predetermined requirements have been met.
  - e. Performing reviews, surveillances and audits of inspections performed by plant or contractor personnel at the plant.
  - f. Reviewing plant developed inspection procedures.
2. The ~~Plant~~ Decommissioning Manager shall be responsible for:
  - a. Writing and approving inspection instructions and check lists.
  - b. Assuring that activities requiring quality assurance meet predetermined requirements.
  - c. Providing qualified personnel and necessary equipment for inspections to assure quality work.
  - d. Performing plant inspection activities to assure that predetermined requirements have been met.

YANKEE ATOMIC ELECTRIC COMPANY

- e. Hold points incorporation where applicable.

C. IMPLEMENTATION

4. Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

- a.1. Independence of personnel performing the inspection from the personnel performing the activity being inspected.
- b.2. Use of instructions or check-lists which incorporate the details listed in Section XVII Item C.1.a.
- c.3. Use of necessary drawings and specifications when performing inspection operations.
- d.4. Inspection of repairs and replacements in accordance with the approved design and inspection requirements or acceptable alternatives.
- e.5. Surveillance of processing methods, equipment, and personnel when direct inspection is not possible.
- f.6. Qualification of inspectors in accordance with applicable codes, standards, and company training programs; and maintenance of qualifications and certifications.
- g.7. Review of maintenance documents by qualified personnel knowledgeable personnel in quality assurance to determine the need for inspection, identification of inspection personnel, and documentation of inspection results.



## YANKEE ATOMIC ELECTRIC COMPANY

### XI. TEST CONTROL

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes the measures for a test program to demonstrate that structures, systems, and components will perform satisfactorily in service.

#### B. RESPONSIBILITIES

1. The Quality Assurance ~~Department~~ Organization shall be responsible for audit and/or surveillance of vendor test program activities; and associated documentation.
  - ~~a. Surveillance of vendor test program activities.~~
  - ~~a. Surveillance of the documentation generated during the test program.~~
2. The ~~(Engineering Manager/-)~~ Decommissioning Manager ~~Plant~~ shall be responsible for ensuring a testing process is developed and implemented for applicable plant changes. The testing process which performs the tests and evaluates the results and approves the test results. This process shall include the provision of qualified personnel and calibrated equipment for testing.
  - ~~a. Determination of when testing is required following plant changes.~~
  - ~~b. Establishment of specifications, requirements, and acceptance criteria for testing following plant changes.~~
  - ~~c. Development of test documents, performance of tests, and documentation, evaluation, and approval of test results.~~
  - ~~d. Provision of qualified personnel and calibrated equipment for testing.~~
3. ~~The Nuclear Safety Audit and Review Committee shall be responsible for reviewing proposed tests or experiments, which involve an unreviewed safety question, as defined in 10CFR50.59.~~
4. ~~The Plant Operations Review Committee shall be responsible for the review of all test documents and test results for special tests.~~

YANKEE ATOMIC ELECTRIC COMPANY

C. IMPLEMENTATION

4. Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

a. 1. Assurance that changes, repairs, and replacements are tested in accordance with the approved design and testing requirements or acceptable alternatives.

b. 2. Review and acceptance of written test documents and test results.  
Consideration shall be given to the following items for incorporation or reference of the following:

1-a. Requirements and acceptance limits contained in applicable design and procurement documents.

2-b. Instructions for performing the test.

3-c. Test prerequisites, such as:

a) Calibrated instrumentation;

b) Adequate and appropriate equipment;

c) Trained, qualified, and licensed/certified personnel;

d) Competence of item to be tested;

e) Suitable and controlled environmental conditions; and

f) Provisions for data collection and storage.

4-d. Mandatory inspection hold points for witness by owner, contractor or inspector, when applicable.

5-e. Acceptance and rejection criteria.

6-f. Method of documenting test data and results.

e. Procedures shall provide for specification of test equipment with suitable accuracy. The criteria for determining the accuracy requirements of test equipment shall be provided when identification of specific equipment is not practical.

## YANKEE ATOMIC ELECTRIC COMPANY

### XII. CONTROL OF MEASURING AND TEST EQUIPMENT

#### A. SCOPE

This section of the ~~Decommissioning Quality Assurance Program~~ DQAP establishes the measures for the control, calibration and periodic adjustments of tools, gages, instruments, and other measuring and test devices used to verify conformance to established requirements.

#### B. RESPONSIBILITIES

1. The ~~Plant Decommissioning Manager~~ shall be responsible for ensuring the development and implementation of documents for control of measuring and test equipment, including identification, calibration, and documentation:

~~a. Development of the implementing documents for control of measuring and test equipment including identification and calibration for equipment under their control.~~

~~b. Provision of calibrated tools, gages and instruments necessary to perform required measurement and tests.~~

~~c. Maintenance of calibration.~~

~~d. Preparation and review of specifications for measuring and test equipment, such that all applicable requirements are satisfied.~~

2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

#### C. IMPLEMENTATION

1. Satisfaction of this criterion shall be assured by identifying, controlling, and calibrating measuring and test equipment with traceability to the calibration and test data, through the implementation of the actions listed below:

~~a. Identification and traceability of measuring and test equipment to the calibration test data.~~

~~b. Labeling or tagging of measuring and test equipment to indicate due date for calibration.~~

- ~~e. 2.~~ Calibration of measuring and test equipment at specified intervals and maintaining associated documentation based on required accuracy, purpose,



## YANKEE ATOMIC ELECTRIC COMPANY

degree of usage, stability characteristics, and other conditions affecting the measurement.

- d.3. Documentation of measures taken to determine the validity of previous inspections performed when measuring and test equipment is found to be out of calibration.
- e.4. Use of calibration standards have an uncertainty (error) requirement of no more than  $\frac{1}{4}$  of the tolerance of the equipment being calibrated. Calibration standards limited by the "state-of-the-art" may have a greater acceptable uncertainty.
- 5. Documentation and maintenance of the status of all items under the calibration system.
- f.6. Traceability of reference and transfer standards to nationally recognized standards; or, documentation of the basis for calibration where national standards are nonexistent.

## YANKEE ATOMIC ELECTRIC COMPANY

### XIII. HANDLING, STORAGE AND SHIPPING

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes measures to control the handling, storage, shipping, cleaning and preservation of material and equipment to prevent damage or deterioration.

#### B. RESPONSIBILITIES

1. The ~~Plant Decommissioning Manager~~ shall be responsible for ensuring the:
  - a. Development ~~of the~~ and implementation of documents for the handling, storage and shipping of materials and equipment.
  - b. ~~Providing~~ ensuring of suitable facilities and equipment for handling, storage, and shipping of materials.
  - c. Inspections and tests of special handling tools and equipment.
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

#### C. IMPLEMENTATION

~~4. Satisfaction of this criterion shall be assured through the development and implementation of documents for special handling, preservation, storage, cleaning, packaging, and shipping, by qualified individuals, in accordance with predetermined work and inspection instructions the actions listed below:~~

- a. ~~Specification and accomplishment of special handling, preservation, storage, cleaning, packaging, and shipping requirements by qualified individuals in accordance with predetermined work and inspection instructions.~~
- b. ~~Preparation of instructions in accordance with design and specification requirements which control the cleaning, handling, storage, packaging, shipping, and preservation of safety classified materials, components and systems to preclude damage, loss or deterioration by environmental conditions such as temperature or humidity.~~

## YANKEE ATOMIC ELECTRIC COMPANY

### XIV. INSPECTION, TEST AND OPERATING STATUS

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes the measures for indicating the status of items undergoing inspections and tests (via tags, labels, logs, data sheets, etc.), to prevent the unintentional bypass of required tests. In addition, this section establishes measures for indicating the operating status of components and systems to prevent their inadvertent operation.

#### B. RESPONSIBILITIES

1. The Plant Decommissioning Manager shall be responsible for ensuring the control of operating equipment or systems, including the use of qualified personnel:
  - a. ~~Ensuring indication of the status of operating equipment or systems to be removed from service for maintenance, test, inspection, repair or change.~~
  - a. ~~Designation of personnel who are responsible for directing the status change of equipment and systems.~~
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

#### C. IMPLEMENTATION

~~4. Satisfaction of this criterion shall be assured through the implementation of the actions listed below:~~  
procedural controls for inspecting, testing, and operating status of structures, systems, and components, utilizing status indicators, such as tags, markings, labels, and stamps.

- a. ~~Notification of affected organizations for changes in the inspection, test and operating status of structures, systems, and components.~~
- b. ~~Procedural control of the bypassing of required inspections, tests and other critical operations with the concurrence of the Quality Assurance Department.~~
- e. ~~Procedural control of the application and removal of inspection and status indicators such as tags, markings, labels and stamps.~~



## YANKEE ATOMIC ELECTRIC COMPANY

### XV. NONCONFORMING MATERIALS, PARTS, AND COMPONENTS

#### A. SCOPE

This section of the ~~Decommissioning Quality Assurance Program~~ DQAP establishes the measures to control materials, parts, components, or any other activities which do not conform to requirements, in order to prevent their inadvertent use.

#### B. RESPONSIBILITIES

~~The Quality Assurance Department shall be responsible for:~~

~~a. Review of nonconformance reports to determine repetitive nonconforming conditions and to verify resolution of significant conditions adverse to quality to preclude recurrence.~~

~~b. Establishment of feedback system between Yankee Atomic Electric Company and vendor representatives in regard to nonconforming material or services.~~

~~c. Initiation of nonconformance reports when conditions are found which may adversely affect the quality of plant systems, structures, activities, or components.~~

~~2. The Engineering Decommissioning Manager shall be responsible for ensuring the:~~

~~1. Writing of implementation documents for the identification, documentation, and corrective action for services, material, installation, testing, operation, and/or surveillance nonconformances.~~

~~2. Initiating nonconformance reports when conditions are found which may adversely affect the quality of plant systems, structures, components, or activities.~~

~~a. 3. Review of nonconforming services or items which cannot be corrected by vendor action.~~

~~b. 4. Preparation or approval of implementing documents for repair and/or rework of nonconforming items.~~

~~5. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.~~

~~The Decommissioning Manager and Staff shall be responsible for the evaluation of significant plant-initiated nonconforming item, service, or activity dispositions.~~

~~4. The Plant shall be responsible for:~~

## YANKEE ATOMIC ELECTRIC COMPANY

- a. ~~Writing implementation documents for the identification, documentation, and corrective action for services, material, installation, testing, operation, and/or surveillance nonconformances at the Plant.~~
- b. ~~Establishment of measures to provide for the documented control of nonconforming materials, parts, and components.~~
- c. ~~Establishment of feedback system between the plant and vendor representatives for the disposition of nonconforming services, materials, parts and components.~~

### C. IMPLEMENTATION

- 4.1. Satisfaction of this criterion shall be assured through the development and implementation of the actions listed below:
  - a. Identification, disposition, inspection and segregation of nonconforming items, services, or activities, including associated documentation.
  - b. Identification of those individuals or groups delegated the responsibility and authority for the disposition and written approval of nonconforming items or activities.
  - c. Subsequent inspections and tests of reworked or repaired items which require reinspection and retest to original methods or methods equivalent thereto.
  - d. Inclusion of nonconformance reports dispositioned "accept as is" or "repair" as part of the inspection records furnished to the plant.
  - e. Periodic analysis of nonconformance reports to show quality trends with the results reported to management for review and assessment.
- 2. The identification, description, disposition, inspection and signature approval of the final disposition for of nonconformances shall be documented in a Nonconformance condition Report.

## YANKEE ATOMIC ELECTRIC COMPANY

### XVI. CORRECTIVE ACTION

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes measures to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment are promptly identified and corrected.

#### B. RESPONSIBILITIES

~~1. The Quality Assurance Department shall be responsible for review and/or audit of recommendations to prevent recurrence of a significant condition adverse to quality.~~

2.1.        The Decommissioning Manager ~~and staff~~ shall be responsible for the development and implementation of a process for identifying, documenting, and correcting conditions adverse to quality, including the identification of causes for significant conditions adverse to quality.

2.        The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criteria.

#### ~~Review of significant adverse conditions reported by the Plant including corrective actions taken.~~

~~b. Coordination of comments between the Plant and the Engineering Department.~~

3. The Plant shall be responsible for:

~~a. Identification of causes of conditions adverse to quality.~~

~~b. Implementation of the corrective action.~~

~~c. Documentation of corrective action taken.~~

4. The Engineering Manager shall be responsible for:

~~a. Review of conditions adverse to quality which involve design deficiencies to determine the cause of the condition.~~

~~b. Recommendations of corrective action to preclude repetition of design deficiencies.~~

5. ~~The Plant Operations Review Committee shall be responsible for:~~



## YANKEE ATOMIC ELECTRIC COMPANY

a. ~~Review of significant conditions adverse to quality and recommending corrective action.~~

b. ~~Recommendations involving repetition of significant operating deficiencies.~~

### C. IMPLEMENTATION

4. Satisfaction of this criterion shall be assured through the identification, documentation, and implementation of the actions listed below:

1. Documentation of conditions adverse to quality.

a. 2. Initiation of corrective action following the for determination of a conditions adverse to quality, to preclude recurrence including, the identification of the cause of significant conditions adverse to quality, with corrective actions taken, to preclude recurrence.

b. 3. Follow up Periodic reviews to verify proper implementation of corrective actions and to close out the corrective action documentation.

4. Reporting of significant conditions adverse to quality, the cause of the conditions, and the corrective action implemented to the cognizant appropriate levels of management for review and assessment, ~~both "off-site" and "on-site".~~

## YANKEE ATOMIC ELECTRIC COMPANY

### XVII. QUALITY ASSURANCE RECORDS

#### A. SCOPE

1. This section of the ~~Decommissioning Quality Assurance Program~~ DQAP establishes the measures for maintenance of records which provide documentary evidence of the quality of items and the activities affecting quality. Requirements shall be established for identification, transmittal, retrievability and retention of quality assurance records including duration, location, protection and assigned responsibility.
2. The quality assurance records shall include, but not be limited to, applicable plant history; operating logs; principal maintenance; design change activities; reportable occurrences; nonconformance reports; results of reviews, inspections, tests, audits and material analyses; monitoring of work performance; qualification of personnel, documents and equipment; drawings; specifications; procurement documents; calibration documents and reports; corrective action reports, and other applicable decommissioning and spent fuel storage records.

#### B. RESPONSIBILITIES

1. The Quality Assurance ~~Department Organization~~ shall be responsible for: the control of applicable records and for performance of audits and/or surveillance of this DQAP criteria.
  - a. ~~Maintenance of qualification/certification records for Quality Assurance Department personnel.~~
  - b. ~~Maintenance of audit, surveillance and inspection records of quality assurance activities generated by the Quality Assurance Department personnel or their designates.~~
  - c. ~~Control and distribution of the Decommissioning Quality Assurance Program and revisions thereto.~~
2. The Plant shall be responsible for:
  - a. ~~Writing implementation documents for the establishment and maintenance of Plant Quality Assurance records.~~
  - b. ~~Designating individuals and establishing requirements for the control of plant design, procurement, and operational records involving quality assurance.~~

## YANKEE ATOMIC ELECTRIC COMPANY

~~c. Provision of facilities to prevent deterioration or loss of documentation.~~

~~d. Provision of a system for the review, approval and retention of plant prepared documents such as reportable occurrences, technical reports, required records and the meeting minutes of official committees.~~

3.2. \_\_\_\_\_ The Decommissioning Manager shall be responsible for establishing a system effor the identification, review, approval and retention of documents relating to quality assurance records and its implementation for the operation of the departments as defined above and in Section 6 of the Defueled Technical Specifications and for assuring its implementation.

### C. IMPLEMENTATION

~~4. Satisfaction of this criterion shall be assured through the implementation of the actions listed below an established process which provides for administration, receipt, storage, preservation, safe keeping, retrieval, and final inspection of records.:~~

~~a. Specifying the details required for inspections and test records including the following as applicable:~~

~~1) Description of the type of observation.~~

~~2) Evidence of completion and verification of manufacturing, inspection, or test operations.~~

~~3) The date and results of the inspection or test.~~

~~4) Information related to conditions adverse to quality.~~

~~5) Inspector or data recorder identification.~~

~~6) Evidence as to the acceptability of the results.~~

~~7) Acceptance and rejection criteria.~~

~~8) Identification of required procedures, drawings, and specifications and revisions.~~

~~9) Specification of the necessary measuring and test equipment including accuracy requirements.~~

~~10) Spent fuel storage records.~~



YANKEE ATOMIC ELECTRIC COMPANY

11) ~~Decommissioning records.~~

b. ~~Providing for record administration, receipt, storage, preservation, safekeeping, retrieval and final disposition.~~

e. ~~The siting c~~Construction, location and security of record storage facilities shall to prevent destruction of the records by fire, flooding, theft, and deterioration by environmental conditions such as temperature or humidity. Duplicate records shall be stored in a separate remote location when the type of document is not ~~included~~ permanently maintained in the record storage facility.

## YANKEE ATOMIC ELECTRIC COMPANY

### XVIII. AUDITS

#### A. SCOPE

This section of the ~~Decommissioning Quality Assurance Program~~ DQAP establishes the measures for a comprehensive system of planned and documented audits and in-plant surveillances to verify compliance with all aspects of the ~~Program~~ DQAP and to assess the effectiveness of the ~~Program~~ DQAP.

#### B. RESPONSIBILITIES

1. The Quality Assurance ~~Department~~ Organization shall be responsible for:
  - a. Providing objective evidence for audits/surveillances ~~of activities~~ encompassed by the 18 criteria of 10CFR50 Appendix B; 10CFR71, Subpart H; 10CFR72, Subpart G; and the DQAP, as applicable, and ANSI N18.7.
  - b. Training and qualification of audit and surveillance personnel.
  - c. Scheduling, coordinating, and implementing the ~~formal In-Plant Audit/ Surveillance Programs performed on activities covered in Sections III through XVII of this document.~~
  - d. Preparing information regarding the ~~In-Plant Audit/ Surveillance Program~~ for review by the ~~Nuclear Safety Audit and Review Committee~~ IRAC.
  - e. Performing ~~audits~~ vendor oversight of vendors.
  - f. Following up of ~~discrepancies~~ findings discovered during audits/surveillance.
  - g. ~~Making~~ Providing recommendations to preclude recurrence of possible audit/surveillance ~~discrepancy~~ findings repetition recurrence.
  - h. Performing periodic audits of ~~all functional areas, activities, and procedures~~ having responsibilities under the ~~Decommissioning Quality Assurance Program~~ DQAP.
2. The ~~Plant Decommissioning Manager~~ shall be responsible for correcting findings identified during audits and surveillances.

## YANKEE ATOMIC ELECTRIC COMPANY

~~Documentation of the plant position concerning any outstanding item resulting from an audit requiring a response.~~

~~b. Implementation of action to be taken as directed by the Decommissioning.~~

~~3. The Nuclear Safety Audit and Review Committee shall be responsible for:~~

~~a. Evaluation of the Decommissioning Quality Assurance Program to determine its overall effectiveness.~~

~~b. Reporting results of Program reviews and recommendations resulting therefrom to the President and Chief Executive Officer.~~

~~4. The Decommissioning Manager shall be responsible for:~~

~~a. Documentation of the department position concerning any outstanding item resulting from an audit.~~

~~b. Implementation of action to be taken to correct deficiencies revealed by an audit.~~

~~c. Evaluate disposition of In Plant Audits and prepares concurrence directives to the plant.~~

### C. IMPLEMENTATION

~~4. Satisfaction of this criterion shall be assured through the implementation of the following actions:~~

~~a. 1. \_\_\_\_\_ Documentation and review of audit/surveillance results and review with management having responsibility in the area.~~

~~b. 2. \_\_\_\_\_ Necessary Management action to be taken by responsible management to correct deficiencies findings revealed by the identified by audit/surveillance activities.~~

~~c. 3. \_\_\_\_\_ Re-audit of deficient areas until Review of corrective actions have been accomplished to preclude recurrence of the deficiencies actions effectiveness during audits.~~

~~4. Inclusion of an objective Evaluation of quality-related practices, procedures, instructions and the effectiveness of their implementation in the audit. Inclusion of an objective evaluation of work areas, activities, processes and items and the review of documentation in the audit.~~



YANKEE ATOMIC ELECTRIC COMPANY

f.5. ~~Performance of audits in the below listed areas where the requirements of Appendix B to 10CFR Part 50 and ANSI N18.7 are being implemented:~~

~~Operation, maintenance and repairs:~~

~~2) The preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings.~~

~~3) Receiving and plant inspections.~~

~~4) Indoctrination and training programs.~~

~~5) Implementation of operating and test procedures.~~

~~6) Calibration of measuring and test equipment.~~

g.6. ~~Scheduling of audits regularly on the basis of the status and safety importance of the activities being performed.~~

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX A

Qualification Requirements for  
Management of Quality Assurance

Management of Quality Assurance must meet the below listed qualification requirements:

A. EDUCATION:

Bachelor's degree in Science or Engineering, or the equivalent in practical experience.

B. EXPERIENCE:

1. Four years experience in the field of Quality Assurance, or
2. Equivalent number of years of nuclear plant experience in a supervisory position preferably at an operating or decommissioning nuclear power plant or a combination of the two.
  - a. At least one year of this four years experience shall be nuclear power plant experience in the implementation of the Quality Assurance Program, and
  - b. Six months of the one year experience shall be obtained within a Quality Assurance organization.

# YANKEE ATOMIC ELECTRIC COMPANY

## APPENDIX B

### ExceptionsDecomm'ssioning Quality Assurance Program Exceptions

The sub-categories of this Appendix summarize the exceptions noted in Section II of the Yankee Atomic Electric Company Decommissioning Quality Assurance Manual.

Appendix B Sub-Category	Standard/Guide	Title
<del>I.</del>	ANSI N45.2.3-1973	<del>Housekeeping During the Construction Phase of Nuclear Power Plants</del>
<del>II.I.</del>	ANSI N45.2.9-1974	Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants
<del>III.II.</del>	ANSI N45.2.10-1973	Quality Assurance Terms and Definitions
<del>IV.III.</del>	R.G. 1.64, Rev. 2	Quality Assurance Requirements for the Design of Nuclear Power Plants
<del>V.IV.</del>	ANSI N45.2.2-1972	Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants
<del>VI.V.</del>	ANSI N45.2.6-1978	Qualification of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants
<del>VII.VI.</del>	R.G. 1.26, Rev. 3	Quality Group Classifications and Standards for Water-, Steam- and Radioactive-Waste-Containing Components of Nuclear Power Plants
<del>VIII.</del>	R.G. 1.29, Rev. 3	<del>Seismic Design Classification</del>
<del>IX.VII.</del>	ANSI N18.7-1976	Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

Title: Appendix B, DQAP Exceptions

Page: 1 of 13

Rev.: 29

Date: August 1999

Title: YDQAP

Page: 1

Rev.: 28

Date: October 16, 1998



YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

~~1. ANSI N45.2.3 - 1973, Housekeeping During the Construction Phase of Nuclear Power Plants~~

~~A. EXCEPTION:~~

Subsection 2.1 - Planning

The Yankee plant takes exception to the five zone requirements specified in the subject standard.

ALTERNATIVE:

The Yankee plant shall establish as a minimum a three zone program as follows:

Zone III

Zone III criteria shall be applied to major portions of the reactor coolant system which are opened for inspection, maintenance or repair.

- ~~1. Access control over personnel shall be required.~~
- ~~2. Cleanliness shall be maintained, commensurate with the work being performed, so as to preclude the entry of foreign material to the Reactor Coolant System.~~
- ~~3. A documented cleanliness inspection shall be performed immediately prior to closure.~~

Note: The Zone III requirements may be expanded for certain maintenance repair activities if deemed appropriate by plant management. In such instances applicable sections of Zones I & II shall be specified.

Zone IV

Zone IV criteria shall be applied to the radiation control areas of the plant.

- ~~1. Standard janitorial and work practices shall be utilized to maintain a level of cleanliness commensurate with company policy in the areas of Housekeeping, Plant and Personnel Safety and Fire Protection.~~
- ~~2. Additional housekeeping requirements shall be implemented as required for the control of radioactive contamination.~~

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

~~3. Smoking and eating shall be controlled consistent with good health physics practices and to maintain cleanliness.~~

Zone V

~~Zone V criteria shall be applied to the remainder of the plant.~~

~~4. Standard janitorial and work practices shall be utilized to maintain a level of cleanliness commensurate with company policy in the areas of Housekeeping, Plant and Personnel Safety and Fire Protection.~~

~~B. EXCEPTION:~~

Subsection 3.2 Control of Facilities

~~The Yankee plant takes exception to the control of tools, equipment, materials and supplies used in Zone III.~~

ALTERNATIVE:

~~The Yankee plant shall verify control for Zone III as indicated in Exception A of this subcategory.~~

I. ANSI N45.2.9 - 1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants

A. EXCEPTION:

Subsection 5.6(3) Facility

The Yankee plant takes exception to "structures, doors, frames, and hardware should be Class A fire rated with a recommended four hour minimum rating."

ALTERNATIVE:

"Doors, structures, frames, and hardware shall be designed to comply with the requirements of a minimum two (2) hour fire rating, meeting NFPA No. 232 guidelines."

JUSTIFICATION:

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

The two (2) hour rating has been endorsed by the NRC Standard Review Plan NUREG-0800, Revision 2, dated July 1981.

Title: Appendix B, Exceptions DQAP Exceptions  
Page: 4 of 13  
Rev.: 2829  
Date: October 16, 1998 August 1999



YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

III. ANSI N45.2.10 - 1973, Quality Assurance Terms and Definitions

A. EXCEPTION:

Subsection 2 - Terms and Definitions

The Yankee plant takes exception to the definitions of "Certificate of Conformance" and "Certificate of Compliance".

ALTERNATIVE:

The Yankee plant shall reverse the definitions of the above terms so our Program will be in compliance with the implied definitions in the ASME B&PV Code and Yankee specifications.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

III. Regulatory Guide 1.64, Revision 2, "Quality Assurance Requirements for the Design of Nuclear Power Plants"

A. EXCEPTION:

Subsection c.2

The Yankee plant takes exception to the regulatory guide position on the exclusion of supervisors performing design verification.

ALTERNATIVE:

The Yankee plant will continue the accepted practices for independent design verification in accordance with the provisions of ANSI N45.2.11-1974, Section 6.1.

JUSTIFICATION:

The exclusion of line supervision to perform design verification has proven to be an unnecessary burden on the resources within the engineering organizations of the company, and counterproductive during heightened periods of engineering activities. ANSI N45.2.11 contains specific limitations on the situations in which a supervisor is permitted to perform design verification. The standard states, "This verification may be performed by the originator's supervisor provided the supervisor did not specify a singular design approach, or rule out certain design considerations and did not establish the design inputs used in the design, or if the supervisor is the only individual in the organization competent to perform the verification." This control was developed through realistic evaluation of the practicable limits that restrictions impose on engineering organizations by the working group that developed ANSI N45.2.11.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

IV. ANSI N45.2.2 - 1972, Packaging, Shipping, Receiving, Storage & Handling of Items for Nuclear Power Plants

A. EXCEPTION:

Subsection 3.7.1 & A3.7.1 - Containers

The Yankee plant takes exception to the specific requirements for containers.

ALTERNATIVE:

Containers shall be of suitable construction to assure material is received undamaged.

JUSTIFICATION:

Containers shipped by closed carrier, stored inside and not subjected to a wet environment do not require weather resistant fiberboard, therefore, this is an unnecessary expense. Additionally, numerous vendors utilize shipping containers that do not comply with the specific requirements of this section, i.e., flaps overlap. The acceptance criteria for a shipping container should be established based on the capability of the container to maintain the component material in a safe condition. Technology has advanced beyond the standard.

B. EXCEPTION:

Subsection 3.7.2 - Crates and Skids

The Yankee plant takes exception to the requirement that skids and runners shall be used on boxes with a gross weight of 100 pounds or more.

ALTERNATIVE:

Skids or runners shall be used on boxes with a gross weight of 100 pounds or more if practical.

JUSTIFICATION:

Storage methods and container design frequently are such that runners or skids are not feasible.

C. EXCEPTION:

Title: Appendix B, Exceptions DQAP Exceptions  
Page: 7 of 13  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999



## YANKEE ATOMIC ELECTRIC COMPANY

### APPENDIX B (Continued)

#### Subsection 5.2.1 - Shipping Damage Inspection

The Yankee plant takes exception to the requirement that a preliminary visual inspection or examination be performed prior to unloading.

#### ALTERNATIVE:

The Yankee plant shall perform those required inspections after unloading. In special instances, preunloading inspections shall be performed.

#### JUSTIFICATION:

Post unloading inspection is adequate to determine any damage that may have been incurred during shipping and handling.

#### D. EXCEPTION:

#### Subsection 5.2.2 - Item Inspection

The Yankee plant takes exception to the requirement, that "The inspections shall be performed in an area equivalent to the level of storage requirements for the item."

#### ALTERNATIVE:

The Yankee plant shall perform receiving inspection in a manner and in an environment which do not endanger the requisite quality of the item; however, receiving area environmental controls may be less stringent than storage environmental controls for that item. When inspections are performed in receiving areas with environmental controls less stringent than storage area environmental controls, a time limit shall be established on a case basis for retention of items in the receiving area. Retention time shall be such that deterioration is prevented and applicable manufacturer recommendations are addressed.

#### JUSTIFICATION:

Receipt inspection activities are for a much shorter duration and therefore should not be subjected to the same stringent requirements as required for storage.

#### E. EXCEPTION:

#### Subsection 5.2.3 - Special Inspection

Title: Appendix B, ~~Exceptions~~ DQAP Exceptions  
Page: 8 of 13  
Rev.: 2829  
Date: ~~October 16, 1998~~ August 1999

## YANKEE ATOMIC ELECTRIC COMPANY

### APPENDIX B (Continued)

The Yankee plant takes exception to attaching special inspection procedures to the item or container.

#### ALTERNATIVE:

Special inspection procedures shall be readily available to personnel performing inspections.

#### JUSTIFICATION:

Procedures are subject to less abuse and more stringent controls when maintained on file and not attached to the item. Inspection status is maintained by tagging and procedure control.

#### F. EXCEPTION:

##### Subsection 6.1.2 - Levels of Storage

The Yankee plant takes exception to two specific requirements associated with fuel storage (classified Level A).

#### ALTERNATIVE:

The Yankee plant shall meet the requirements of Level A storage for new fuel with the exception of special air filtering; and temperature and humidity controls.

#### JUSTIFICATION:

The existing storage conditions at the Yankee plant is consistent with the protection provided to the fuel while in storage at the manufacturer (vendor) and/or while in transit to the plant site and are judged to provide adequate protection to the fuel assembly structure which is of highly corrosion resistant materials. We believe that the above listed requirements are intended for application at the manufacturing facility (vendor) where the uranium pellets may be exposed to the atmosphere and not in its fully encapsulated, and therefore, fully protected form in a completed fuel assembly.

#### G. EXCEPTION:

##### Appendix A-3 Subsection A3.5.1(1) - Caps & Plugs

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

The Yankee plant takes exception to the requirement that nonmetallic plugs and caps be brightly colored.

ALTERNATIVE:

Nonmetallic plugs and caps shall be of a contrasting color.

JUSTIFICATION:

The purpose of utilizing brightly colored plugs and caps is to assist in assuring obstructions are not inadvertently placed in operating components or systems. By using plugs and caps of a contrasting color this objective can be achieved.

H. EXCEPTION:

Appendix A-3 Subsection A3.9(1) - Second Group, Markings

The Yankee plant takes exception to the requirement that container markings shall appear on a minimum of two sides.

ALTERNATIVE:

Containers shall be adequately marked to provide identification and retrievability.

JUSTIFICATION:

Containers are tagged to provide identification and inspection status. Employment of two tags on small containers adds bulk and confusion and does not provide for better identification or traceability.

I. EXCEPTION:

Appendix A-3, Subsection A.3.9(4) - Second Group, Marking

The Yankee plant takes exception to the requirement that container markings shall be no less than 3/4" high, container permitting.

ALTERNATIVE:

Container markings shall be of a size which permits easy recognition.



YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

JUSTIFICATION:

Markings were intended to provide identification and instructions. The criteria should be that the markings clearly provide the same.

J. EXCEPTION:

Appendix A-3 Subsection A.3.9(6) - Second Group, Marking

The Yankee plant takes exception to the information required for container marking.

ALTERNATIVE:

Marking shall be adequate in each case to provide identification, traceability and instructions for special handling, as applicable.

JUSTIFICATION:

The information required is excessive. Cluttering a container with excessive markings only reduces the main objectives, maintaining identification and establishing special controls.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

VI. ANSI N45.2.6 - 1978, Qualification of Inspection, Examination and Testing Personnel for Nuclear Power Plants

A. EXCEPTION:

The Yankee plant takes exception to the application of the Standard to all Yankee and Vermont Yankee personnel performing inspection, examination and testing.

ALTERNATIVE:

Yankee personnel identified in ANSI N18.1-1971 who perform inspection, examination and testing will be qualified to ANSI N18.1-1971.

Yankee personnel not identified in ANSI N18.1-1971 who perform inspection, examination and testing will be qualified to ANSI N45.2.6-1978.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

VII. Regulatory Guide 1.26, Rev. 3, (2/76), Quality Group Classifications and Standards for Water-, Steam- and Radioactive-Waste-Containing Components of Nuclear Power Plants

A. EXCEPTION:

The Yankee plant takes exception to the Regulatory Guide in its entirety.

ALTERNATIVES:

The Yankee plant shall continue to classify structures, components and systems in accordance with ANSI Standard N18.2, January 1973, "Nuclear Safety Criteria for the Design of Stationary Pressurized Water Reactor Plants", as in the past.



YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

~~VIII. Regulatory Guide 1.29, Rev. 3, (9/78), Seismic Design Classification~~

~~A. EXCEPTION:~~

~~The Yankee plant takes exception to the application of Regulatory Guide 1.29, Rev. 3, (9/78).~~

~~ALTERNATIVES:~~

~~The Yankee (plant) shall apply Regulatory Guide 1.29, Rev. 3, (9/78), to those structures, systems and components as determined by the USNRC Systematic Evaluation Program.~~

# YANKEE ATOMIC ELECTRIC COMPANY

## APPENDIX B (Continued)

### VIIIIX. ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

#### EXCEPTION:

##### Subsection 5.2.15 - Review, Approval and Control of Procedures

The Yankee Plant takes exception to the following paragraph;

"Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable".

#### ALTERNATIVES:

Plant procedures will be periodically reviewed in accordance with administrative controls. These controls will establish a schedule for these periodic reviews. All applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure (malfunction), and following a modification to a system.

Nonroutine procedures such as Emergency Plan Implementing Procedures, or other procedures whose use may be event driven, will be reviewed every two years.

However, if a nonroutine procedure is fully exercised and there is a detailed scrutiny of the entire procedure as part of a documented training program, this may serve as the biennial review of the procedure used.

At least every two years, the Quality Assurance (or other independent) organization shall audit a representative sample of routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

Routine plant procedures that have not been used for two years will be reviewed before use to determine if changes are necessary or desirable.

## YANKEE ATOMIC ELECTRIC COMPANY

### APPENDIX B (Continued)

#### JUSTIFICATION:

The current requirement to review each safety-related procedure on a biennial cycle results in the expenditure of significant technical and administrative resources. Programmatic controls and practices are in place to provide adequate reviews, including the following:

- The plant modification processes require that procedures affected by the modification be identified during the design change preparation, and revised prior to closure of the modification package.
- Administrative controls currently exist requiring that if a procedure cannot be performed as written, a procedure change must be completed prior to continuation of the procedure.
- Temporary changes are occasionally generated during, or prior to procedure use. Current administrative controls require that those changes that are permanent shall be incorporated into the procedure via the procedure revision process.
- As part of the audit and surveillance process, procedures are evaluated as to adequacy, ease of use, proper technical content, and compliance with applicable plans and programs.
- The corrective action process requires that a root cause analysis be performed for events, violations and nonconforming conditions. Where identified as contributing factors, procedure changes are initiated.
- Changes to Technical Specifications and the FSAR are reviewed for potential impact on, and initiation of changes to plant procedures.
- Plant procedures are approved by appropriate personnel prior to initial use. Current administrative controls also require pre-job briefings for procedures identified as infrequent.

This modification meets the intent of published regulatory requirements involving activities important to safety.



YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX C

Yankee

Classification of Structures, Components, and Systems

~~NOTE:~~ A comprehensive listing is in the Yankee Safety Classification Manual. Safety-Related  
None.

Important to Safety as Defined in 10CFR72

The Safety Classification of Structures, Systems and Components (SSCs) will be defined prior to the design and construction of the ISFSI.

ATTACHMENT C

YANKEE ATOMIC ELECTRIC COMPANY  
DECOMMISSIONING QUALITY ASSURANCE PROGRAM  
YDQAP

PREPARED BY: C. Russell Clark  
C. Russell Clark  
Manager, Decommissioning QA

REVIEWED BY: Walter K. Peterson  
Walter K. Peterson  
Oversight Manager

Donald A. Reid  
Donald A. Reid  
Decommissioning Manager

APPROVED BY: Don K. Davis  
Don K. Davis  
Chairman, Chief Executive Officer and President



YANKEE ATOMIC ELECTRIC COMPANY

YDQAP

TABLE OF CONTENTS/INDEX

<u>Section No.</u>	<u>Title</u>	<u>Revision</u>
-	AMENDMENT/REVISION	29
-	POLICY STATEMENT	29
I	ORGANIZATION	29
II	QUALITY ASSURANCE PROGRAM	29
III	DESIGN CONTROL	29
IV	PROCUREMENT DOCUMENT CONTROL	29
VI	DOCUMENT CONTROL	29
VII	CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES	29
VIII	IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS	29
IX	CONTROL OF SPECIAL PROCESSES	29
X	INSPECTION	29
XI	TEST CONTROL	29
XII	CONTROL OF MEASURING AND TEST EQUIPMENT	29
XIII	HANDLING, STORAGE, AND SHIPPING	29
XIV	INSPECTION, TEST, AND OPERATING STATUS	29
XV	NONCONFORMING MATERIALS, PARTS, AND COMPONENTS	29
XVI	CORRECTIVE ACTION	29
XVII	QUALITY ASSURANCE RECORDS	29

Title: YDQAP  
 Page: II  
 Rev.: 29  
 Date: August 1999

YANKEE ATOMIC ELECTRIC COMPANY

YDQAP

TABLE OF CONTENTS/INDEX  
(Continued)

<u>Section No.</u>	<u>Title</u>	<u>Revision</u>
XVIII	AUDITS	29
APPENDIX A	QUALIFICATION REQUIREMENTS	29
APPENDIX B	DECOMMISSIONING QUALITY ASSURANCE PROGRAM EXCEPTIONS	29
APPENDIX C	YR SYSTEMS, STRUCTURES AND COMPONENTS CLASSIFICATION	29

Title: YDQAP  
Page: III  
Rev.: 29  
Date: August 1999

# YANKEE ATOMIC ELECTRIC COMPANY

## YDQAP

### AMENDMENT/REVISION SHEET

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
0 (Amendment 1)	12/10/76	To address questions submitted by letter from NRC (K. R. Goller) to L. H. Heider (11/1/76).
0 (Amendment 2)	1/13/77	To address questions submitted by letter from NRC (K. R. Goller) to L. H. Heider (12/28/76).
1	9/15/77	To address organizational, programmatic, and editorial changes.
2	11/01/77	To address organizational changes.
3	11/25/77	To address organizational changes at Vermont Yankee.
4	1/13/78	To address combined inspection numbers 50-29/77-20; 50-271/77-15; and 50-309/77-16 unresolved item 4.a.
5	1/30/78	To address change in exception for ANSI N45.2.3-1973.
6	10/19/78	To address exceptions to ANSI N45.2.2-1972.
6 (Amendment 1)	3/29/79	To resolve items submitted by letter from NRC (W. P. Haass) to L. H. Heider (3/6/79).
7	9/11/79	To address changes to Yankee Rowe (Appendix D) and Vermont Yankee (Appendix E) Safety Classifications.
8	4/04/80	To address organizational changes.
9	3/09/81	To address organizational changes.
10	4/03/81	To add "Packaging of Radioactive Materials" and "Fire Protection of Safety-Related Areas" to "Other Items Requiring Quality Assurance".
11	3/01/82	To resolve items submitted by letter from NRC (W. P. Haass) to W. P. Johnson (6/10/81).
12	3/11/83	To address organizational changes.
13		To address organizational and programmatic changes.
14	10/12/83	To address organizational changes.
15	2/15/84	To address programmatic changes.
16	10/31/85	To address organizational and programmatic changes.

Title: YDQAP  
 Page: IV  
 Rev.: 29  
 Date: August 1999



YANKEE ATOMIC ELECTRIC COMPANY

YDQAP

AMENDMENT/REVISION SHEET

(Continued)

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
17	12/05/86	To address organizational and programmatic changes.
17A	8/14/87	To clarify surveillance activities and change VP-MOO responsibilities for the level of deficiencies requiring evaluation.
18	4/29/88	To address organizational and programmatic changes.
19	10/02/89	To address organizational and responsibility changes and deletion of Appendix C.
19A	6/01/90	To update organizational chart (for VY) to be consistent with Proposed Change No. 157 and to address organizational changes at Vermont Yankee.
20	12/21/90	To update organizational changes at Yankee and change QAD's responsibility from reviewing design documents to auditing those documents for inclusion of quality requirements.
21	11/15/91	To update organizational changes at Yankee and Vermont Yankee and change QAD responsibility from revising recommendations to prevent recurrences of significant condition adverse to quality to providing the option to review and/or audit recommendations.
22	4/15/92	To delete Appendix D listing and reference Yankee Safety Classification of Systems Manual.
23	5/30/92	To address organizational and responsibility changes.
24	12/15/93	To address organizational changes, and DQA/NSARC reporting clarifications for Vermont Yankee.
25	12/15/94	To address organizational changes made at the Yankee Nuclear Power Station addressing the decommissioning organization. Clarifications in the revised corrective action process at Vermont Yankee, and to address an exception to Regulatory Guide 1.64, and to clarify responsibilities between the Yankee and Vermont Yankee Plants.
26	12/21/95	To address organizational changes at the Yankee Nuclear Power Station and the Vermont Yankee Nuclear Power Station. To address exceptions to ANSI 18.7 and Regulatory Guide 1.33.
27	12/20/96	To address organizational changes.

Title: YDQAP  
Page: V  
Rev.: 29  
Date: August 1999

YANKEE ATOMIC ELECTRIC COMPANY

YDQAP

AMENDMENT/REVISION SHEET

(Continued)

<u>Revision No.</u>	<u>Date</u>	<u>Reason</u>
28	5/30/97	To update organizational changes. Changed exception to Regulatory Guide 1.26 for VY only. <u>(This was withdrawn in BYR 98-025, dated 4/14/98.)</u>
28	10/16/98	Resubmit Rev. 28 to update organizational changes, delineate decommissioning organization and eliminate all references to Vermont Yankee Nuclear Power Corporation.
29	8/31/99	To update the Program to include 10CFR72 and to redefine responsibilities and requirements based on the current status of the plant.

Title: YDQAP  
Page: VI  
Rev.: 29  
Date: August 1999

# YANKEE ATOMIC ELECTRIC COMPANY

## POLICY STATEMENT

### DECOMMISSIONING QUALITY ASSURANCE PROGRAM

It is the policy of those organizations operating under this Decommissioning Quality Assurance Program to strive for excellence in all aspects of nuclear power plant decommissioning and spent fuel storage. This goal can only be attained if each individual recognizes that Quality is everyone's responsibility. Each worker, supervisor, and manager has a role to play in achieving the goal of "doing it right the first time." Only if we recognize that Quality is of paramount importance can we continue to provide for safe decommissioning and fuel storage.

This Decommissioning Quality Assurance Program applies to all activities associated with structures, systems, and components which are safety-related or important to safety controlled by 10CFR71 and 10CFR72. This program implements 10CFR50, Appendix B, and satisfies 10CFR71, Subpart H; and 10CFR72, Subpart G. Certain additional administrative requirements are applied to other items and activities that are important as defined in administrative procedures. DQAP applicable structures, systems, and components are defined in Appendix C.

The function of the Quality Oversight Program is to assess and communicate to management the adequacy, content, and appropriateness of the work being performed and to facilitate continuous enhancements. However, supervision and management does not rely solely upon the efforts of the Quality Assurance Groups for quality oversight; they also take an active role in self-assessment of those activities under their control to identify problems. As previously noted, the ultimate responsibility for quality lies with each individual.

Under the program, The Yankee Atomic Electric Company Chairman, Chief Executive Officer, and President is the final management authority responsible for assuring that this policy statement and the Decommissioning Quality Assurance Program are implemented within the Yankee Atomic Electric Company.

The Chairman, Chief Executive Officer, and President has overall responsibility for assuring implementation of the program. The President has delegated to the Decommissioning Quality Assurance Manager under the cognizance of the Oversight Manager the responsibility for establishment, control, and distribution of the Decommissioning Quality Assurance Program and revisions thereto, and establishment of policies under which the Quality Assurance Department operates. The Quality Assurance staff shall have the authority and organizational freedom to meet the requirements of 10CFR50, Appendix B, which satisfies 10CFR71, Subpart H; and 10CFR72, Subpart G.

The Decommissioning Manager shall be responsible for the day-to-day implementation of the program's procedural requirements.

Title: Policy Statement  
Page: 1 of 2  
Rev.: 29  
Date: August 1999



## YANKEE ATOMIC ELECTRIC COMPANY

An Independent Review Committee shall review the adequacy and effectiveness of this program as defined in the Defueled Technical Specifications. Any recommendations for corrections, enhancements, or concerns shall be reported to the Chairman, Chief Executive Officer, and President.

The safe and reliable decommissioning and spent fuel storage can only be achieved with the cooperation and support of all personnel. Every individual is expected to perform his or her task with the skill, professionalism, and dedication necessary to achieve this goal.

## YANKEE ATOMIC ELECTRIC COMPANY

### I. ORGANIZATION

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program describes the duties and responsibilities of the personnel involved in establishing and executing the Decommissioning Quality Assurance Program.

#### B. RESPONSIBILITY

The responsibility for decommissioning and spent fuel storage at the Yankee Nuclear Power Station rests with the Yankee Atomic Electric Company. The responsibility for developing and implementing the Quality Assurance Program within the Yankee Site is vested in the Chairman, Chief Executive Officer, and President of the Yankee Atomic Electric Company. He has delegated certain areas of authority for the development and implementation of certain phases of the Program as set forth in the following paragraphs of this section.

Duke Engineering and Services (DE&S) has been retained by the Yankee Atomic Electric Company (YAEC) to provide certain QA management, engineering and related technical and administrative support services. All work performed by DE&S under the terms of the agreement, shall be performed in accordance with the applicable programs and procedures required per this manual, or the DE&S QA Program as approved by YAEC.

The Quality Assurance Organization, reporting to the Chairman, Chief Executive Officer, and President for YAEC through the Oversight Manager has the organizational responsibility for the continuing review and audit of the implementation of the Decommissioning Quality Assurance Program.

#### C. ORGANIZATIONAL RELATIONSHIPS

The lines of authority of all personnel and functional positions involved in the implementation of the Decommissioning Quality Assurance Program are shown in Figure 1.

#### D. QUALITY ASSURANCE PROGRAM RESPONSIBILITIES

##### 1. Chairman, Chief Executive Officer and President

The Chairman, Chief Executive Officer (CEO), and President reports to the YAEC Board of Directors. This individual has overall responsibility for the development and implementation of the DQAP, while ensuring an organization is

## YANKEE ATOMIC ELECTRIC COMPANY

established to ensure the effective implementation of the program. The Chairman, CEO, and President has delegated the necessary authority and has assigned responsibility for implementation of the DQAP for the Yankee Nuclear Power Company to the Decommissioning Manager. The Decommissioning Quality Assurance Manager under the cognizance of the Oversight Manager has assigned responsibility for the development of the DQAP and oversight of its implementation.

### **2. Decommissioning Manager**

The Decommissioning Manager acts as the Site Manager as defined in the Final Safety Analysis Report. The Decommissioning Manager has responsibility for providing the overall implementation of the DQAP and in providing support services to the operating staff. The Decommissioning Manager is responsible for the safe operation of facility systems, structures, and components and for providing support activities necessary for safe operation, maintenance, and decommissioning of the plant. The Decommissioning Manager is responsible for the administration of Engineering, Licensing, Health and Safety, Construction, Site Services, Radiation Protection, Training, Chemistry, and Radioactive Waste. The responsibility for plant operational activities is delegated to the Plant Superintendent.

### **3. Plant Superintendent**

The Plant Superintendent reports to the Decommissioning Manager, and is responsible for the direction and administration of the Operations, Maintenance, and Security of the plant.

### **4. Oversight Manager**

The Oversight Manager reports to the Chairman, CEO, and President and is responsible for overview of the Quality Assurance Organization. This individual is also responsible for providing oversight of the development, implementation, and maintenance of the DQAP and implementing procedures. The Oversight Manager provides for review and evaluation of compliance with state and federal regulatory requirements for nuclear power facilities. This individual ensures that the Quality Assurance Organization has sufficient organizational freedom and authority to identify problems, to initiate, recommend or provide solutions and to verify implementation of solutions.



## YANKEE ATOMIC ELECTRIC COMPANY

### 5. Decommissioning Quality Assurance Manager

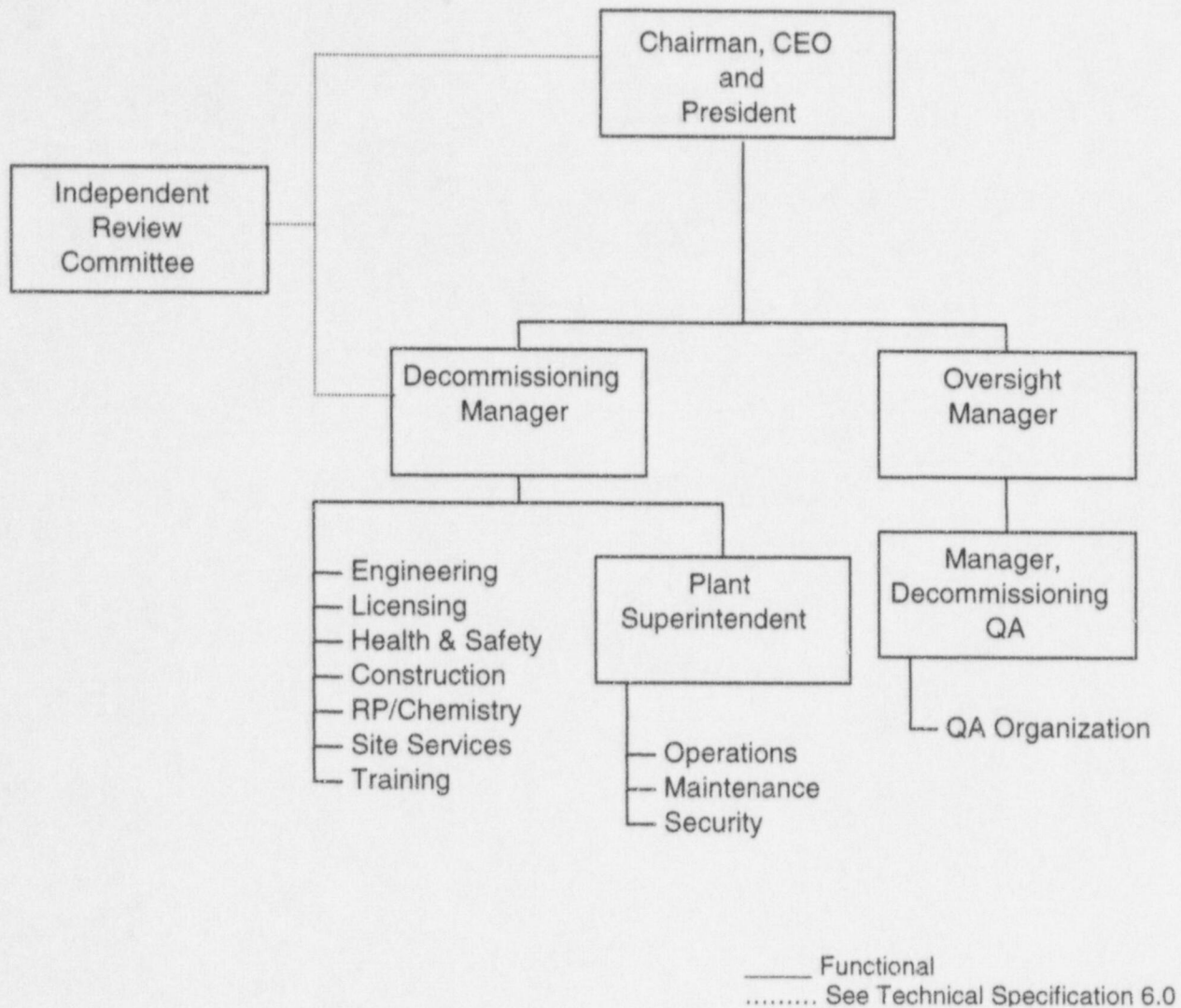
The Decommissioning Quality Assurance Manager reports to the Oversight Manager and is responsible for directing and administering the audit, surveillance and inspection activities performed by the Quality Assurance Organization. This individual is responsible for the verification of compliance with the DQAP; Licensing Requirements; 10CFR50, Appendix B; 10CFR71, Subpart H; 10CFR72, Subpart G; and other regulatory requirements. The Decommissioning Quality Assurance Manager is also responsible for maintaining the DQAP current and has the authority to stop unsatisfactory work.

### 6. Independent Review Committee

An Independent Review Committee is responsible for those activities defined in Section 6 of the Technical Specifications. Section 6 also defines the functional reporting requirements.

# YANKEE ATOMIC ELECTRIC COMPANY

## Organization Chart



## YANKEE ATOMIC ELECTRIC COMPANY

### II. QUALITY ASSURANCE PROGRAM

#### A. SCOPE

This section establishes the criteria to be applied to the structures, systems, and components. These structures, systems, and components are listed in Appendix C.

#### B. RESPONSIBILITIES

1. Compliance with the requirements of the Decommissioning Quality Assurance Program - based on the criteria of 10CFR50, Appendix B, which satisfies 10CFR71, Subpart H and 10CFR72, Subpart G shall be the responsibility of all personnel involved with quality activities. The performance of quality-related activities shall be accomplished with appropriate equipment under suitable environmental conditions.

Note: Each section of the Program incorporates the designation of specific organizational responsibilities.

2. Individuals having overall responsibility for the establishment/distribution control and implementation of the DQAP are delineated in Section I "Organization" of the Program.
3. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Establishment of an effective Quality Assurance Program is assured through implementation of 10CFR50, Appendix B, which satisfies the requirements of 10CFR71, Subpart H; and 10CFR72, Subpart G, as applied to those systems, structures, and components important to safety. Programs and/or procedures are developed to implement the DQAP. The following regulatory positions in the below listed Regulatory Guides and ANSI Standards are utilized to meet the applicable requirements. Implementation of this Program is assured through Quality Assurance and the applicable procedures derived from Quality Assurance policies, goals and objectives. The Quality Assurance Organization shall review Quality Assurance Program procedures to assure their derivation from the policies, goals and objectives established by the Chairman, CEO and President.

1. 10CFR50, Appendix B, Quality Assurance Criteria for Nuclear Power Plants



## YANKEE ATOMIC ELECTRIC COMPANY

2. ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.33, Revision 2)
3. ANSI N45.2.2-1972, Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (Endorsed by Regulatory Guide 1.38, Revision 2)
4. ANSI N45.2.3-1973, Housekeeping During the Construction Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.39, Revision 2)
5. ANSI N45.2.5-1974, Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.94, Revision 1)
6. ANSI N45.2.6-1978, Qualification of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants (Endorsed by Regulatory Guide 1.58, Revision 1)
7. ANSI N45.2.9-1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants (Endorsed by Regulatory Guide 1.88, Revision 2)
8. ANSI N45.2.10-1973, Quality Assurance Terms and Definitions
9. ANSI N45.2.11-1974, Quality Assurance Requirements for the Design of Nuclear Power Plants (Endorsed by Regulatory Guide 1.64, Revision 2)
10. ANSI N45.2.12-1977, Requirements for Auditing of Quality Assurance Program for Nuclear Power Plants (Endorsed by Regulatory Guide 1.144, Revision 1)
11. ANSI N45.2.13-1976, Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants (Endorsed by Regulatory Guide 1.123, Revision 1)
12. ANSI N45.2.23-1978, Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants (Endorsed by Regulatory Guide 1.146, August 1980)
13. ANSI N18.1-1971, Selection and Training of Nuclear Power Plant Personnel (Endorsed by Regulatory Guide 1.8, Revision 1-R)

Title: Section II, Quality Assurance Program  
Page: 2 of 4  
Rev.: 29  
Date: August 1999

## YANKEE ATOMIC ELECTRIC COMPANY

14. Regulatory Guide 1.26, Revision 3, Quality Group Classifications and Standards for Water-, Steam, and Radioactive-Waste-Containing Components of Nuclear Power Plants

- Notes:
- 1) When conflicts in similar requirements contained in Technical Specifications and the above documents exist, the requirements contained in Technical Specifications override those in the documents. Requirements in the documents will be considered when they supplement and are not in conflict with similar requirements in Technical Specifications.
  - 2) Revisions to the above listed documents will be considered for applicability to the Yankee Decommissioning Quality Assurance Program upon written direction thereof by the Regional Administrator, Nuclear Regulatory Commission - Office of Inspection and Enforcement - Region I.
  - 3) Only those documents listed above shall be considered applicable to the Yankee plant. Documents further referenced by the above listed documents shall not be considered applicable. They may, however, be considered as guidelines.

\*Exceptions and alternatives to the provisions contained in this Standard/Guide are detailed in Appendix B.

- 4) This Program shall be applicable to those activities requiring quality assurance which occur commencing within 90 days after acceptance of the Program by the Nuclear Regulatory Commission.
- 5) The NRC shall be notified of changes, that reduce commitments in the accepted description of the DQAP, for their review and acceptance prior to implementation. Acceptance will be assumed 60 days after submittal unless notified otherwise. A previously approved NRC SER may be used to make changes which reduce commitments under the same approval conditions.
- 6) Changes that do not reduce DQAP commitments or were made based on previously approved NRC SER shall be submitted to the NRC at least annually.
- 7) Editorial changes or personnel reassignments of a nonsubstantive nature do not require NRC notification.

## YANKEE ATOMIC ELECTRIC COMPANY

### D. MANAGEMENT EVALUATION

The Chairman, CEO and President ensures the performance of periodic evaluations of the DQAP. The review is performed to evaluate compliance with the DQAP and to evaluate its effectiveness.

### E. TRAINING

The Decommissioning Manager is responsible for indoctrination and training of staff personnel involved with DQAP activities.

This indoctrination and training shall include the following:

1. Instruction as to the purpose, scope, and implementation of applicable quality-related manuals, instructions, and procedures.
2. Training and qualification in the principles and techniques of the activity being performed.
3. Documentation of the training implementation.
4. Maintenance of personnel proficiency by retraining, re-examining, and/or recertifying.



## YANKEE ATOMIC ELECTRIC COMPANY

### III. DESIGN CONTROL

#### A. SCOPE

This section of the DQAP establishes measures to assure that the design of and changes to structures, systems, and components (SSCs) covered by the DQAP are controlled.

#### B. RESPONSIBILITIES

1. Design activities associated with applicable SSCs have been delegated to Duke Engineering & Services (DE&S). DE&S shall provide for:
  - a. The control of design activities for applicable structures, systems, or components, including the requirement for independent review. This review shall be performed by an uninvolved, but technically knowledgeable, person in the engineering discipline.
  - b. Identification, documentation, and control of deviations from specified design requirements and/or quality standards.
  - c. Design analysis and delineation of acceptance criteria for inspections and tests when required.
  - d. Verification of the adequacy of a specific design feature by implementation of a prototype test when required.
  - e. Review of inspection and test data for compliance with established engineering criteria when required.
2. Independent Review committee activities shall be performed in accordance with Section 6 of the Defueled Technical Specifications as required.
3. The Decommissioning Manager shall be responsible for ensuring the appropriate review and approval of proposed plant changes.
4. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

## YANKEE ATOMIC ELECTRIC COMPANY

1. Correct translation of applicable regulatory requirements and design bases into specifications, drawings and written documents.
2. Application of suitable design controls to such activities as seismic, stress, thermal, hydraulic, radiation, and accident analyses; compatibility of materials; and accessibility for inservice inspection, maintenance and repair.
3. Design reviews to assure that design characteristics can be controlled, inspected and tested.
4. Performance of proper selection and accomplishment of design verification or checking process such as design reviews, alternate calculations, qualification testing or test programs. When a test program is used to verify the adequacy of a design, a qualification test of a prototype unit under the most adverse design conditions shall be used. The responsibilities and qualifications of the verifier, the areas and features to be verified, the pertinent considerations to be verified, and the extent of documentation are identified in procedures.

The criteria that specify when verification should be performed by test will be provided. If the verification method is by test only, prototype, component, or feature testing is performed in accordance with written procedures prior to relying upon the component, system, or structure to perform its function.

5. Subjection of design and specification changes to the same design controls and approvals that were applicable to the original design unless delegated in writing to another responsible organization.
6. Documenting errors and deficiencies in the design process that adversely affect safety-related classified structures, systems, and components and the performance of corrective action to preclude repetition.
7. Review of standard "off-the-shelf" commercial or previously approved materials, parts, and equipment that are essential to the quality functions of structures, systems, and components, for suitability of application prior to selection.
8. Selection of suitable materials, parts, equipment, and processes for quality classified structures, systems, and components.
9. Establishment of procedures to assure that computer programs are verified and validated for a particular application.

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### IV. PROCUREMENT DOCUMENT CONTROL

#### A. SCOPE

This section of the DQAP establishes the measures necessary to assure that applicable regulatory requirements, design bases and other requirements which are necessary to assure adequate quality, are suitably included or referenced in the documents for procurement of material, equipment and services.

#### B. RESPONSIBILITIES

1. This activity has been delegated to DE&S (approved vendor). DE&S shall provide for:
  - a. The preparation of detailed procedures as to how purchase documents are prepared, reviewed, approved, issued, and controlled.
  - b. The integration of appropriate quality assurance requirements into procurement requisitions.
2. The Decommissioning Manager shall be responsible for ensuring:
  - a. The preparation of engineering specifications which detail the technical and quality requirements for material, equipment and services.
  - b. The periodic review of purchasing documentation for material, equipment, and services required to support applicable plant changes.
3. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of the criterion shall be assured through the implementation of the actions listed below:

1. Documentation of the review and approval of procurement documents prior to release and maintain availability of this documentation for verification.
2. Identification of the vendor's applicable quality assurance requirements of 10CFR50, Appendix B and/or ANSI N18.7, and/or other applicable codes, standards or regulatory documents referenced in procurement documents which are to be reviewed by the qualified personnel knowledgeable in decommissioning quality assurance.



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3. Identification in the procurement documents of the applicable documentation to be prepared, maintained, and/or submitted to the purchaser prior to purchase, such as:
  - a. Drawings, specifications, procedures;
  - b. Inspection and fabrication plans;
  - c. Inspection and test records;
  - d. Personnel and procedure qualifications;
  - e. Chemical and physical test results of material; and
  - f. Right of access to the vendor's facilities and records for surveillance and/or audit of procurement documentation.
4. Review and approval of changes and revisions to procurement documents at least equivalent to those for the original document.
5. Control of procurement documents for spare and replacement parts at least equivalent to that used for the original equipment.

## YANKEE ATOMIC ELECTRIC COMPANY

### V. INSTRUCTIONS, PROCEDURES, AND DRAWINGS

#### A. SCOPE

This section of the DQAP establishes the measures for prescribing and accomplishing activities requiring quality assurance in accordance with approved drawings, instructions, or procedures.

#### B. RESPONSIBILITIES

1. The Decommissioning Manager is responsible for ensuring applicable procedures governing the activities affecting quality are established and followed.
2. Persons preparing and approving documents are responsible for assuring that specifications, instructions, procedures, and drawings include appropriate quantitative or qualitative acceptance criteria for determining that activities have been satisfactorily accomplished; assuring that the applicable criteria of 10CFR50, Appendix B which satisfies the requirements of 10CFR71, Subpart H and 10CFR72, Subpart G and/or ANSI N18.7 are specified; and assuring that the documents are kept current. In addition, the following departments have the distinct responsibilities delineated below.
  - a. The Decommissioning Manager shall be responsible for ensuring the preparation, approval, maintenance, and implementation of all instructions, drawings, and procedures associated with plant and contracted service and activities.
  - b. An independent review committee shall be responsible for reviewing those items defined in the Defueled Technical Specifications.
3. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

1. Establishment of provisions which clearly delineate the sequence of actions to be accomplished in the preparation, review, approval, and control of instructions, procedures, and drawings.

YANKEE ATOMIC ELECTRIC COMPANY

2. Review of quality procedures, drawings and specifications and changes thereto by knowledgeable personnel.



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### VI. DOCUMENT CONTROL

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes the measures for controlling the issuance of documents, including revisions thereto, which affect quality activities.

#### B. RESPONSIBILITIES

1. The Decommissioning Manager shall ensure document control measures are established which provide for the following:
  - a. Identification of controlled documents utilized for performing quality activities.
  - b. Identification of organizations responsible for preparation, review, approval, and control of documents used in performing the activity.
  - c. Coordination and control of interface documents.
  - d. Establishment of distribution lists.
  - e. Action to be taken for obsolete or superseded documents.
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

1. Review and approval of document changes by the same "effected" organizations that performed the original review and approval or by other responsible organizations delegated by the controlling authority.
2. Inclusion of approved changes in instructions, drawings, and other applicable documents prior to placing the system in operating status.
3. Provision to allow availability of documents, as needed, at the location where the activity is to be performed prior to commencing the work.

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4. Establish, maintain, revision, and distribution of a master list or equivalent to identify the current revision number of instructions, specifications, drawings, procurement documents, or other quality assuring documents. (Cancelled procedures are not required for inclusion within the list.)
5. Control of documents as identified in administrative procedures.
6. Appendices to the Decommissioning Quality Assurance Program are considered to be part of the Program and are reviewed and approved in accordance with the Program.

## YANKEE ATOMIC ELECTRIC COMPANY

### VII. CONTROL OF PURCHASED MATERIAL, EQUIPMENT, AND SERVICES

#### A. SCOPE

This section of the DQAP establishes measures to assure that purchased material, equipment and services, whether purchased directly or through contractors and subcontractors, conform to the procurement documents.

#### B. RESPONSIBILITIES

1. The Quality Assurance Organization shall be responsible for:
  - a. Audits and Commercial Surveys of vendor quality assurance programs.
  - b. Surveillances of vendor activities.
  - c. Maintenance of an approved vendors list.
  - d. Audits and/or surveillance of the implementation of this DQAP criterion.
2. The Decommissioning Manager shall ensure that provisions have been established for the:
  - a. Receipt inspection and control of material and equipment.
  - b. Evaluation of purchased services during and/or after completion of the service.
  - c. Control of purchased material, parts and components until issued for installation or use.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

1. Audits and Commercial Surveys of vendors based on one or more of the following, as appropriate to the scope of procurement activities:



## YANKEE ATOMIC ELECTRIC COMPANY

- a. When required in order to verify vendor capabilities to comply with the applicable criteria of 10CFR50, Appendix B, which satisfies the requirements of 10CFR71, Subpart H; 10CFR72, Subpart G; ANSI N18.7, or other quality program baselines.
  - b. When required, based on the results of a review and evaluation of vendor performance history.
  - c. When required in order to observe vendor facilities/service activities to assure conformance to purchase specifications.
2. Surveillances of vendors which provide for:
    - a. Specification of applicable quality controls, processes to be witnessed or verified, documentation required, and personnel responsible for performing the surveillance.
    - b. Verification that the vendor complies with the quality requirements specified in procurement documents by observation of in-process work.
  3. Transfer of the following records from the vendor to the plant:
    - a. Documentation that identifies the purchased material/services and compliance with the applicable procurement document requirements.
    - b. Documentation that identifies any deviation(s) from procurement requirements, including a description of those deviations dispositioned "accept as is" or "repair".
  4. Review and acceptance of vendor documentation by a responsible qualified individual.
  5. Receipt inspections of vendor furnished material/services, in accordance with predetermined instructions.
  6. Evaluations of vendor effectiveness to control quality is performed at intervals consistent with the importance, complexity and quality of the item/services.

## YANKEE ATOMIC ELECTRIC COMPANY

### VIII. IDENTIFICATION AND CONTROL OF MATERIAL, PARTS, AND COMPONENTS

#### A. SCOPE

This section of the DQAP establishes the measures for identification and control necessary to prevent the use of incorrect or defective material, parts, and components.

#### B. RESPONSIBILITIES

1. The Quality Assurance Organization shall be responsible for review, evaluation, or verification (audit, commercial survey or surveillance) of vendor quality controls and work processes for traceability of materials through the use of heat number, part number, or serial number, either on the item or on records traceable to the items.
2. The Plant shall be responsible for:
  - a. Preparing and approving of documents for the identification and control of materials, parts, and components.
  - b. Maintaining traceability of materials, parts, and components which received, stored, installed, and used at the Plant.
3. The Decommissioning Manager shall be responsible for:
  - a. Assuring that specifications contain appropriate requirements for the identification and control of materials, parts, and components.
  - b. Providing review and approval of documentation for the purchase of materials, parts, and components.
4. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the applicable actions listed below:

1. Traceability of the identification of materials and parts to the appropriate documentation such as drawings, specifications, purchase orders, manufacturing and inspection documents, deviation reports, and Physical and Chemical Material Test Reports.

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2. Identification of the item in a location and with a method which does not affect its fit, function or quality.
3. Documented verification of correct identification of materials, parts, and components prior to release for use.



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### IX. CONTROL OF SPECIAL PROCESSES

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes the measures necessary to assure that special processes, including welding, heat treating, and nondestructive testing, are controlled and accomplished by qualified personnel in accordance with applicable codes, standards, specifications, criteria and other special requirements.

#### B. RESPONSIBILITIES

1. The Decommissioning Manager shall ensure the following:
  - a. Preparation and implementation of documents for welding, heat treating, filler metal control, and nondestructive examinations.
  - b. Review and approval of special process documents provided by the vendor for use on-site and when otherwise specified.
  - c. Assurance that maintenance and change work involving special processes are performed by qualified personnel in accordance with approved documents.
  - d. Control of material used in special processes by plant personnel.
  - e. Training, qualification, and requalification of personnel in nondestructive testing, such as liquid penetrant examination.
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

1. Completion of qualification records of documents, equipment, and personnel connected with special processes in accordance with applicable codes, standards, and specifications.
2. Performance of special processes accomplished in accordance with written process sheets or equivalent with recorded evidence of verification.

YANKEE ATOMIC ELECTRIC COMPANY

3. Maintenance and updating of qualification records of special process documents, equipment, and personnel.

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### X. INSPECTION

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes measures for inspection of activities requiring quality assurance to verify conformance with approved procedures, drawings, specifications and instructions.

#### B. RESPONSIBILITIES

1. The Quality Assurance Organization shall be responsible for:
  - a. Surveillance of vendor inspection activities and personnel.
  - b. Incorporation of mandatory notification/hold points for plant/vendor/service group activities into the QA surveillances and mandatory hold points for inspections.
  - c. Writing, reviewing and approving quality control inspection checklists.
  - d. Performing independent QC inspection, when necessary, to assure that predetermined requirements have been met.
  - e. Performing reviews, surveillances and audits of inspections performed by plant or contractor personnel at the plant.
  - f. Reviewing plant developed inspection procedures.
2. The Decommissioning Manager shall be responsible for:
  - a. Writing and approving inspection instructions and check lists.
  - b. Assuring that activities requiring quality assurance meet predetermined requirements.
  - c. Providing qualified personnel and necessary equipment for inspections to assure quality work.
  - d. Performing plant inspection activities to assure that predetermined requirements have been met.
  - e. Hold points incorporation where applicable.



## YANKEE ATOMIC ELECTRIC COMPANY

### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

1. Independence of personnel performing the inspection from the personnel performing the activity being inspected.
2. Use of instructions or checklists.
3. Use of necessary drawings and specifications when performing inspection operations.
4. Inspection of repairs and replacements in accordance with the approved design and inspection requirements or acceptable alternatives.
5. Surveillance of processing methods, equipment, and personnel when direct inspection is not possible.
6. Qualification of inspectors in accordance with applicable codes, standards, and company training programs; and maintenance of qualifications and certifications.
7. Review of maintenance documents by knowledgeable personnel to determine the need for inspection, identification of inspection personnel, and documentation of inspection results.

## YANKEE ATOMIC ELECTRIC COMPANY

### XI. TEST CONTROL

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes the measures for a test program to demonstrate that structures, systems, and components will perform satisfactorily in service.

#### B. RESPONSIBILITIES

1. The Quality Assurance Organization shall be responsible for audit and/or surveillance of test program activities and associated documentation.
2. The Decommissioning Manager shall be responsible for ensuring a testing process is developed and implemented for applicable plant changes. The testing process which performs the test evaluates the results and approves the results. This process shall include the provision of qualified personnel and calibrated equipment for testing.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the actions listed below:

1. Assurance that changes, repairs, and replacements are tested in accordance with the approved design and testing requirements or acceptable alternatives.
2. Review and acceptance of written test documents and test results. Consideration shall be given to the following items:
  - a. Requirements and acceptance limits contained in applicable design and procurement documents.
  - b. Instructions for performing the test.
  - c. Test prerequisites.
  - d. Mandatory inspection hold points for witness by owner, contractor or inspector, when applicable.
  - e. Acceptance and rejection criteria.
  - f. Method of documenting test data and results.

## YANKEE ATOMIC ELECTRIC COMPANY

### XII. CONTROL OF MEASURING AND TEST EQUIPMENT

#### A. SCOPE

This section of the DQAP establishes the measures for the control, calibration and periodic adjustments of tools, gages, instruments, and other measuring and test devices used to verify conformance to established requirements.

#### B. RESPONSIBILITIES

1. The Decommissioning Manager shall be responsible for ensuring the development and implementation of documents for control of measuring and test equipment, including identification, calibration, and documentation.
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

1. Satisfaction of this criterion shall be assured by identifying, controlling, and calibrating measuring and test equipment with traceability to the calibration and test data.
2. Calibration of measuring and test equipment at specified intervals and maintaining associated documentation based on required accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurement.
3. Documentation of measures taken to determine the validity of previous inspections performed when measuring and test equipment is found to be out of calibration.
4. Use of calibration standards have an uncertainty (error) requirement of no more than  $\frac{1}{4}$  of the tolerance of the equipment being calibrated. Calibration standards limited by the "state-of-the-art" may have a greater acceptable uncertainty.
5. Documentation and maintenance of the status of all items under the calibration system.
6. Traceability of reference and transfer standards to nationally recognized standards; or, documentation of the basis for calibration where national standards are nonexistent.



## YANKEE ATOMIC ELECTRIC COMPANY

### XIII. HANDLING, STORAGE AND SHIPPING

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes measures to control the handling, storage, shipping, cleaning and preservation of material and equipment to prevent damage or deterioration.

#### B. RESPONSIBILITIES

1. The Decommissioning Manager shall be responsible for ensuring the:
  - a. Development and implementation of documents for the handling, storage and shipping of materials and equipment.
  - b. Providing suitable facilities and equipment for handling, storage, and shipping of materials.
  - c. Inspections and tests of special handling tools and equipment.
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the development and implementation of documents for special handling, preservation, storage, cleaning, packaging, and shipping, by qualified individuals, in accordance with predetermined work and inspection instructions.

## YANKEE ATOMIC ELECTRIC COMPANY

### XIV. INSPECTION, TEST AND OPERATING STATUS

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes the measures for indicating the status of items undergoing inspections and tests (via tags, labels, logs, data sheets, etc.), to prevent the unintentional bypass of required tests. In addition, this section establishes measures for indicating the operating status of components and systems to prevent their inadvertent operation.

#### B. RESPONSIBILITIES

1. The Decommissioning Manager shall be responsible for ensuring the control of operating equipment or systems, including the use of qualified personnel.
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of procedural controls for inspecting, testing, and operating status of structures, systems, and components, utilizing status indicators, such as tags, markings, labels, and stamps.

## YANKEE ATOMIC ELECTRIC COMPANY

### XV. NONCONFORMING MATERIALS, PARTS, AND COMPONENTS

#### A. SCOPE

This section of the DQAP establishes the measures to control materials, parts, components, or any other activities which do not conform to requirements, in order to prevent their inadvertent use.

#### B. RESPONSIBILITIES

The Decommissioning Manager shall be responsible for ensuring the:

1. Writing of implementation documents for the identification, documentation, and corrective action for services, material, installation, testing, operation, and/or surveillance nonconformances.
2. Initiating nonconformance reports when conditions are found which may adversely affect the quality of plant systems, structures, components, or activities.
3. Review of nonconforming services or items which cannot be corrected by vendor action.
4. Preparation or approval of implementing documents for repair and/or rework of nonconfirming items.
5. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

1. Satisfaction of this criterion shall be assured through the development and implementation of the actions listed below:
  - a. Identification, disposition, inspection and segregation of nonconforming items, services, or activities, including associated documentation.
  - b. Identification of those individuals or groups delegated the responsibility and authority for the disposition and written approval of nonconforming items or activities.
  - c. Subsequent inspections and tests of reworked or repaired items which require reinspection and retest to original methods or methods equivalent thereto.
  - d. Inclusion of nonconformance reports dispositioned "accept as is" or "repair" as part of the inspection records furnished to the plant.



**YANKEE ATOMIC ELECTRIC COMPANY**

- e. Periodic analysis of nonconformance reports to show quality trends with the results reported to management for review and assessment.
- 2. The identification, description, disposition, inspection and signature approval of the final disposition of nonconformances shall be documented in a Condition Report.

## YANKEE ATOMIC ELECTRIC COMPANY

### XVI. CORRECTIVE ACTION

#### A. SCOPE

This section of the Decommissioning Quality Assurance Program establishes measures to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment are promptly identified and corrected.

#### B. RESPONSIBILITIES

1. The Decommissioning Manager shall be responsible for the development and implementation of a process for identifying, documenting, and correcting conditions adverse to quality, including the identification of causes for significant conditions adverse to quality.
2. The Quality Assurance Organization will perform audits and/or surveillances of the implementation of this DQAP criterion.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the identification, documentation, and implementation of the actions listed below:

1. Documentation of conditions adverse to quality.
2. Initiation of corrective action for conditions adverse to quality, including, the identification of the cause of significant conditions adverse to quality, with corrective actions taken, to preclude recurrence.
3. Periodic reviews to verify proper implementation of corrective actions.
4. Reporting of significant conditions adverse to quality, the cause of the conditions, and the corrective action implemented to the appropriate levels of management for review and assessment.

## YANKEE ATOMIC ELECTRIC COMPANY

### XVII. QUALITY ASSURANCE RECORDS

#### A. SCOPE

1. This section of the DQAP establishes the measures for maintenance of records which provide documentary evidence of the quality of items and the activities affecting quality. Requirements shall be established for identification, transmittal, retrievability and retention of quality assurance records including duration, location, protection and assigned responsibility.
2. The quality assurance records shall include, but not be limited to, applicable plant history; operating logs; principal maintenance; design change activities; reportable occurrences; nonconformance reports; results of reviews, inspections, tests, audits and material analyses; monitoring of work performance; qualification of personnel, documents and equipment; drawings; specifications; procurement documents; calibration documents and reports; corrective action reports, and other applicable decommissioning and spent fuel storage records.

#### B. RESPONSIBILITIES

1. The Quality Assurance Organization shall be responsible for the control of applicable records and for performance of audits and/or surveillance of this DQAP criterion.
2. The Decommissioning Manager shall be responsible for establishing a system for the identification, review, approval and retention of documents relating to quality assurance records and its implementation as defined above and in Section 6 of the Defueled Technical Specifications and for assuring its implementation.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of an established process which provides for administration, receipt, storage, preservation, safe keeping, retrieval, and final inspection of records.

The construction location and security of record storage facilities shall prevent destruction of the records by fire, flooding, theft, and deterioration by environmental conditions such as temperature or humidity. Duplicate records shall be stored in a separate remote location when the type of document is not permanently maintained in the record storage facility.



## YANKEE ATOMIC ELECTRIC COMPANY

### XVIII. AUDITS

#### A. SCOPE

This section of the DQAP establishes the measures for a comprehensive system of planned and documented audits and in-plant surveillances to verify compliance with all aspects of the DQAP and to assess the effectiveness of the DQAP.

#### B. RESPONSIBILITIES

1. The Quality Assurance Organization shall be responsible for:
  - a. Providing objective evidence for audit/surveillance activities encompassed by the 18 criteria of 10CFR50 Appendix B; 10CFR71, Subpart H; 10CFR72, Subpart G; and the DQAP, as applicable, and ANSI N18.7.
  - b. Training and qualification of audit and surveillance personnel.
  - c. Scheduling, coordinating, and implementing the Audit/ Surveillance Programs.
  - d. Preparing information regarding the Audit/Surveillance Program for review by the IRAC.
  - e. Performing vendor oversight.
  - f. Following up of findings discovered during audits.
  - g. Providing recommendations to preclude recurrence of audit/surveillance findings .
  - h. Performing periodic audits of functional areas, activities, and procedures under the DQAP.
2. The Decommissioning Manager shall be responsible for correcting findings identified during audits and surveillances.

#### C. IMPLEMENTATION

Satisfaction of this criterion shall be assured through the implementation of the following actions:

## YANKEE ATOMIC ELECTRIC COMPANY

1. Documentation and review of audit/surveillance results and review with management having responsibility in the area.
2. Management action to correct findings identified by audit/surveillance activities.
3. Review of corrective action effectiveness during audits.
4. Evaluation of quality-related practices, procedures, instructions and the effectiveness of their implementation.
5. Performance of audits .
6. Scheduling of audits on the basis of the status and safety importance of the activities being performed.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX A

Qualification Requirements for  
Management of Quality Assurance

Management of Quality Assurance must meet the below listed qualification requirements:

**A. EDUCATION:**

Bachelor's degree in Science or Engineering, or the equivalent in practical experience.

**B. EXPERIENCE:**

1. Four years experience in the field of Quality Assurance, or
2. Equivalent number of years of nuclear plant experience in a supervisory position preferably at an operating or decommissioning nuclear power plant or a combination of the two.
  - a. At least one year of this four years experience shall be nuclear power plant experience in the implementation of the Quality Assurance Program, and
  - b. Six months of the one year experience shall be obtained within a Quality Assurance organization.



# YANKEE ATOMIC ELECTRIC COMPANY

## APPENDIX B

### Decommissioning Quality Assurance Program Exceptions

The sub-categories of this Appendix summarize the exceptions noted in Section II of the Yankee Atomic Electric Company Decommissioning Quality Assurance Manual.

Appendix B Sub-Category	Standard/Guide	Title
I.	ANSI N45.2.9-1974	Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants
II.	ANSI N45.2.10-1973	Quality Assurance Terms and Definitions
III.	R.G. 1.64, Rev. 2	Quality Assurance Requirements for the Design of Nuclear Power Plants
IV.	ANSI N45.2.2-1972	Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants
V.	ANSI N45.2.6-1978	Qualification of Inspection, Examination and Testing Personnel for the Construction Phase of Nuclear Power Plants
VI.	R.G. 1.26, Rev. 3	Quality Group Classifications and Standards for Water-, Steam- and Radioactive-Waste-Containing Components of Nuclear Power Plants
VII.	ANSI N18.7-1976	Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

I. ANSI N45.2.9 - 1974, Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants

A. EXCEPTION:

Subsection 5.6(3) Facility

The Yankee plant takes exception to "structures, doors, frames, and hardware should be Class A fire rated with a recommended four hour minimum rating."

ALTERNATIVE:

"Doors, structures, frames, and hardware shall be designed to comply with the requirements of a minimum two (2) hour fire rating, meeting NFPA No. 232 guidelines."

JUSTIFICATION:

The two (2) hour rating has been endorsed by the NRC Standard Review Plan NUREG-0800, Revision 2, dated July 1981.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

II. ANSI N45.2.10 - 1973, Quality Assurance Terms and Definitions

A. EXCEPTION:

Subsection 2 - Terms and Definitions

The Yankee plant takes exception to the definitions of "Certificate of Conformance" and "Certificate of Compliance".

ALTERNATIVE:

The Yankee plant shall reverse the definitions of the above terms so our Program will be in compliance with the implied definitions in the ASME B&PV Code and Yankee specifications.



YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

III. Regulatory Guide 1.64, Revision 2, "Quality Assurance Requirements for the Design of Nuclear Power Plants"

A. EXCEPTION:

Subsection c.2

The Yankee plant takes exception to the regulatory guide position on the exclusion of supervisors performing design verification.

ALTERNATIVE:

The Yankee plant will continue the accepted practices for independent design verification in accordance with the provisions of ANSI N45.2.11-1974, Section 6.1.

JUSTIFICATION:

The exclusion of line supervision to perform design verification has proven to be an unnecessary burden on the resources within the engineering organizations of the company, and counterproductive during heightened periods of engineering activities. ANSI N45.2.11 contains specific limitations on the situations in which a supervisor is permitted to perform design verification. The standard states, "This verification may be performed by the originator's supervisor provided the supervisor did not specify a singular design approach, or rule out certain design considerations and did not establish the design inputs used in the design, or if the supervisor is the only individual in the organization competent to perform the verification." This control was developed through realistic evaluation of the practicable limits that restrictions impose on engineering organizations by the working group that developed ANSI N45.2.11.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

IV. ANSI N45.2.2 - 1972, Packaging, Shipping, Receiving, Storage & Handling of Items for Nuclear Power Plants

A. EXCEPTION:

Subsection 3.7.1 & A3.7.1 - Containers

The Yankee plant takes exception to the specific requirements for containers.

ALTERNATIVE:

Containers shall be of suitable construction to assure material is received undamaged.

JUSTIFICATION:

Containers shipped by closed carrier, stored inside and not subjected to a wet environment do not require weather resistant fiberboard, therefore, this is an unnecessary expense. Additionally, numerous vendors utilize shipping containers that do not comply with the specific requirements of this section, i.e., flaps overlap. The acceptance criteria for a shipping container should be established based on the capability of the container to maintain the component material in a safe condition. Technology has advanced beyond the standard.

B. EXCEPTION:

Subsection 3.7.2 - Crates and Skids

The Yankee plant takes exception to the requirement that skids and runners shall be used on boxes with a gross weight of 100 pounds or more.

ALTERNATIVE:

Skids or runners shall be used on boxes with a gross weight of 100 pounds or more if practical.

JUSTIFICATION:

Storage methods and container design frequently are such that runners or skids are not feasible.

C. EXCEPTION:

Title: Appendix B, DQAP Exceptions  
Page: 5 of 13  
Rev.: 29  
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## YANKEE ATOMIC ELECTRIC COMPANY

### APPENDIX B (Continued)

#### Subsection 5.2.1 - Shipping Damage Inspection

The Yankee plant takes exception to the requirement that a preliminary visual inspection or examination be performed prior to unloading.

#### ALTERNATIVE:

The Yankee plant shall perform those required inspections after unloading. In special instances, preunloading inspections shall be performed.

#### JUSTIFICATION:

Post unloading inspection is adequate to determine any damage that may have been incurred during shipping and handling.

#### D. EXCEPTION:

#### Subsection 5.2.2 - Item Inspection

The Yankee plant takes exception to the requirement, that "The inspections shall be performed in an area equivalent to the level of storage requirements for the item."

#### ALTERNATIVE:

The Yankee plant shall perform receiving inspection in a manner and in an environment which do not endanger the requisite quality of the item; however, receiving area environmental controls may be less stringent than storage environmental controls for that item. When inspections are performed in receiving areas with environmental controls less stringent than storage area environmental controls, a time limit shall be established on a case basis for retention of items in the receiving area. Retention time shall be such that deterioration is prevented and applicable manufacturer recommendations are addressed.

#### JUSTIFICATION:

Receipt inspection activities are for a much shorter duration and therefore should not be subjected to the same stringent requirements as required for storage.

#### E. EXCEPTION:

#### Subsection 5.2.3 - Special Inspection



## YANKEE ATOMIC ELECTRIC COMPANY

### APPENDIX B (Continued)

The Yankee plant takes exception to attaching special inspection procedures to the item or container.

#### ALTERNATIVE:

Special inspection procedures shall be readily available to personnel performing inspections.

#### JUSTIFICATION:

Procedures are subject to less abuse and more stringent controls when maintained on file and not attached to the item. Inspection status is maintained by tagging and procedure control.

#### F. EXCEPTION:

##### Subsection 6.1.2 - Levels of Storage

The Yankee plant takes exception to two specific requirements associated with fuel storage (classified Level A).

#### ALTERNATIVE:

The Yankee plant shall meet the requirements of Level A storage for new fuel with the exception of special air filtering; and temperature and humidity controls.

#### JUSTIFICATION:

The existing storage conditions at the Yankee plant is consistent with the protection provided to the fuel while in storage at the manufacturer (vendor) and/or while in transit to the plant site and are judged to provide adequate protection to the fuel assembly structure which is of highly corrosion resistant materials. We believe that the above listed requirements are intended for application at the manufacturing facility (vendor) where the uranium pellets may be exposed to the atmosphere and not in its fully encapsulated, and therefore, fully protected form in a completed fuel assembly.

#### G. EXCEPTION:

##### Appendix A-3 Subsection A3.5.1(1) - Caps & Plugs

## YANKEE ATOMIC ELECTRIC COMPANY

### APPENDIX B (Continued)

The Yankee plant takes exception to the requirement that nonmetallic plugs and caps shall be brightly colored.

#### ALTERNATIVE:

Nonmetallic plugs and caps shall be of a contrasting color.

#### JUSTIFICATION:

The purpose of utilizing brightly colored plugs and caps is to assist in assuring obstructions are not inadvertently placed in operating components or systems. By using plugs and caps of a contrasting color this objective can be achieved.

#### H. EXCEPTION:

##### Appendix A-3 Subsection A3.9(1) - Second Group, Markings

The Yankee plant takes exception to the requirement that container markings shall appear on a minimum of two sides.

#### ALTERNATIVE:

Containers shall be adequately marked to provide identification and retrievability.

#### JUSTIFICATION:

Containers are tagged to provide identification and inspection status. Employment of two tags on small containers adds bulk and confusion and does not provide for better identification or traceability.

#### I. EXCEPTION:

##### Appendix A-3, Subsection A.3.9(4) - Second Group, Marking

The Yankee plant takes exception to the requirement that container markings shall be no less than 3/4" high, container permitting.

#### ALTERNATIVE:

Container markings shall be of a size which permits easy recognition.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

JUSTIFICATION:

Markings were intended to provide identification and instructions. The criteria should be that the markings clearly provide the same.

J. EXCEPTION:

Appendix A-3 Subsection A.3.9(6) - Second Group, Marking

The Yankee plant takes exception to the information required for container marking.

ALTERNATIVE:

Marking shall be adequate in each case to provide identification, traceability and instructions for special handling, as applicable.

JUSTIFICATION:

The information required is excessive. Cluttering a container with excessive markings only reduces the main objectives, maintaining identification and establishing special controls.



YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

V. ANSI N45.2.6 - 1978, Qualification of Inspection, Examination and Testing Personnel for Nuclear Power Plants

A. EXCEPTION:

The Yankee plant takes exception to the application of the Standard to all Yankee and Vermont Yankee personnel performing inspection, examination and testing.

ALTERNATIVE:

Yankee personnel identified in ANSI N18.1-1971 who perform inspection, examination and testing will be qualified to ANSI N18.1-1971.

Yankee personnel not identified in ANSI N18.1-1971 who perform inspection, examination and testing will be qualified to ANSI N45.2.6-1978.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

- VI. Regulatory Guide 1.26, Rev. 3, (2/76), Quality Group Classifications and Standards for Water-, Steam- and Radioactive-Waste-Containing Components of Nuclear Power Plants

A. EXCEPTION:

The Yankee plant takes exception to the Regulatory Guide in its entirety.

ALTERNATIVES:

The Yankee plant shall continue to classify structures, components and systems in accordance with ANSI Standard N18.2, January 1973, "Nuclear Safety Criteria for the Design of Stationary Pressurized Water Reactor Plants", as in the past.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX B  
(Continued)

VIII. ANSI N18.7-1976, Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants

EXCEPTION:

Subsection 5.2.15 - Review, Approval and Control of Procedures

The Yankee Plant takes exception to the following paragraph;

"Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable".

ALTERNATIVES:

Plant procedures will be periodically reviewed in accordance with administrative controls. These controls will establish a schedule for these periodic reviews. All applicable plant procedures will be reviewed following an unusual incident, unexpected transient, operator error, or equipment failure (malfunction), and following a modification to a system.

Nonroutine procedures such as Emergency Plan Implementing Procedures, or other procedures whose use may be event driven, will be reviewed every two years.

However, if a nonroutine procedure is fully exercised and there is a detailed scrutiny of the entire procedure as part of a documented training program, this may serve as the biennial review of the procedure used.

At least every two years, the Quality Assurance (or other independent) organization shall audit a representative sample of routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

Routine plant procedures that have not been used for two years will be reviewed before use to determine if changes are necessary or desirable.



## YANKEE ATOMIC ELECTRIC COMPANY

### APPENDIX B (Continued)

#### JUSTIFICATION:

The current requirement to review each safety-related procedure on a biennial cycle results in the expenditure of significant technical and administrative resources. Programmatic controls and practices are in place to provide adequate reviews, including the following:

- The plant modification processes require that procedures affected by the modification be identified during the design change preparation, and revised prior to closure of the modification package.
- Administrative controls currently exist requiring that if a procedure cannot be performed as written, a procedure change must be completed prior to continuation of the procedure.
- Temporary changes are occasionally generated during, or prior to procedure use. Current administrative controls require that those changes that are permanent shall be incorporated into the procedure via the procedure revision process.
- As part of the audit and surveillance process, procedures are evaluated as to adequacy, ease of use, proper technical content, and compliance with applicable plans and programs.
- The corrective action process requires that a root cause analysis be performed for events, violations and nonconforming conditions. Where identified as contributing factors, procedure changes are initiated.
- Changes to Technical Specifications and the FSAR are reviewed for potential impact on, and initiation of changes to plant procedures.
- Plant procedures are approved by appropriate personnel prior to initial use. Current administrative controls also require pre-job briefings for procedures identified as infrequent.

This modification meets the intent of published regulatory requirements involving activities important to safety.

YANKEE ATOMIC ELECTRIC COMPANY

APPENDIX C

Classification of Structures, Components, and Systems

Safety-Related

None.

Important to Safety as Defined in 10CFR72

The Safety Classification of Structures, Systems and Components (SSCs) will be defined prior to the design and construction of the ISFSI.