



Nebraska Public Power District

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April 19, 1989

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

Subject: Cooper Nuclear Station
Quality Assurance Program
NRC Docket No. 50-298, DPR-46

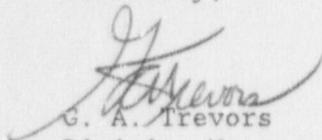
Gentlemen:

This letter transmits to you Revision 5 of Cooper Nuclear Station's (CNS) Quality Assurance Program. This program document is referenced in Appendix D to the USAR and is being submitted in accordance with 10CFR50.54(a).

Attachment "A" is a summary of the changes made and submitted herein. None of the changes represent a reduction in the CNS Quality Assurance Program. The intent of Revision 5 is to update this document to reflect the current organization and practices, and to clarify responsibilities. Attachment "B" is a complete copy of Revision 5.

Previous revisions to this program document were submitted to NRC Region IV (Rev. 1, 4/29/85; Rev. 2, 5/16/85; Rev. 3, 3/27/87; Rev. 4, 4/5/88). Should you have any questions or comments concerning this revision, please contact me.

Sincerely,



G. A. Trevors
Division Manager
Nuclear Support

GAT:JSL:rg
Attachments

cc: U.S. Nuclear Regulatory Commission
Regional Administrator - Region IV

Senior Resident Inspector
Cooper Nuclear Station

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INFORMATION ONLY

QA POLICY DOCUMENT, REV. 5 SUMMARY OF CHANGES

<u>Page No.</u>	<u>Summary of Change</u>	<u>QA Program Reduction?</u>
	*Simple grammar and punctuation changes are not detailed here but are indicated in the text by a revision side-bar.	
1-1	At the end of the last paragraph in section 1.0, added "maintenance, and modification".	No (3)
1-2	In the second sentence of the first paragraph, section 1.2, added the words "maintained, and modified" after "erected".	No (3)
	Added the word "major" before "components" in line 7 of paragraph 1.2.	No (3)
1-3	Deleted "With regard to assurance of quality in all phases of station operation" beginning the second paragraph of section 1.2.	No (1)
	Replaced the word "plant" with the words "Nuclear Power Group (NPG)" in the same paragraph.	No (3)
	Added "as well as non-District personnel who are working under NPPD's QA Program" in first sentence of the second full paragraph.	No (3)
	Deleted "Personnel assignments shall be made by the normal line organization management and will be verified by the QA Division" following the first sentence of the third full paragraph.	No (1)
	Replaced the word "effect" with "maintain" in the last sentence of the third full paragraph on this page.	No (3)
	Replaced the words "the entire" with "Cooper Nuclear" in the last line on this page.	No (3)
1-4	Added to the end of the first paragraph, "Where specific requirements included in the standards are in conflict with original design requirements set forth in the USAR and other appropriate design documents, the original design requirements shall govern. Later revisions may be specifically invoked by the design requirements where deemed appropriate, consistent with the overall commitment to maintain the plant in an 'equal to or better than original' condition."	No (3)

(This statement previously appeared in Section 2.2.3 and was repeated elsewhere. Adding it at this point allows for one generic statement and deletion in other locations.)

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|-----|--|--------|
| 1-5 | Replaced the word "guideline" with "general requirements" in the first paragraph of section 1.3. | No (3) |
| | Added the word "modification" following "operating" into paragraph 1.3(a). | No (3) |
| | Deleted the words "and in compliance with" following "instructions" in paragraphs 1.3(c)(d). | No (1) |
| 1-6 | Replaced the words "set up" with "established" in paragraph 1.3(e). | No (3) |
| | Replaced "construction" with "modification, maintenance" in paragraph 1.3(e). | No (3) |
| | Replaced the word "initiated" with "established" in paragraph 1.3(f). | No (3) |
| | Replaced the word "station" with "NPG" in paragraph 1.3(g). | No (3) |
| 1-7 | Added the words "and programs" following "...other selected systems" in the first sentence of paragraph 1.4. | No (3) |
| | In paragraph 1.4.3 added the word "major" before "components". | No (3) |
| 1-8 | Deleted the words "which are" following "phrases"; replaced the words "in a Quality Assurance Instruction" with "herein"; and deleted the words "and to provide some insight into the intent of these requirements" following the word "Assurance requirements" all in the first sentence of the first paragraph in section 1.5. | No (1) |
| | Deleted the words "and by the several" following "Regulatory Guides" in the fifth line of paragraph 1.5. | No (1) |
| | Replaced "or shall be defined" with "and" in the sixth line of paragraph 1.5. | No (3) |

- 1-9 Beginning on this page several definitions were added to Policy Document section 1.5 as follows: "class; codes and standards; controlling documents; emergency procedures; essential; essential-commercial grade; functional organization chart; inspection; licensed station; maintenance procedures; major maintenance, repair, or modification; minor maintenance, repair, or modification; monitor; non-essential; station permanent record file; off-normal conditions; operating procedures; quality requirements; regulatory criteria; review; safeguard; surveillance; surveillance testing; testing; traceability; witness; designated representatives; lower tier procurement; purchaser; right of access; and services. No (3)
- 1-17 Deleted the words "it is dedicated. This dedication occurs when" in the second paragraph of the definition for Quality Assurance Records. No (1)
- Deleted the word "specifically" following "requirements" in the definition for Quality Control. No (1)
- 1-19 Replaced the definition of safety-related with the words "(See "Essential")". No (3)
- Added "adversely" before "alter" in the definition of Significant Conditions Adverse to Quality. No (3)
- Deleted "on a continuing basis" in the definition of Surveillance following "observations". No (1)
- 2-1 In the first sentence of the first paragraph of section 2.0, replaced the words "to meet the requirements of the 18 criteria of" with "for compliance to", and replaced "it applies" with "applied". No (1)
- Deleted the last sentence of that first paragraph in its entirety. No (1)
- Added the word "responsible" following "management" in the first paragraph of section 2.1. No (3)
- Added "surveillances" following "to perform audits" in the fourth sentence of the same paragraph. No (3)

- 2-2 Replaced the words "the guidelines" with "Instructions" in the first sentence of the first paragraph of section 2.2. No (3)
- Deleted the words "or QA" following "Mandatory QC" in the fifth sentence of this paragraph. No (1)
- In the last sentence of that paragraph deleted the words "accomplish the function of" following "will"; changed "verifying" to "verify"; and replaced "in effect and that QC activities are being carried out as prescribed" with "implemented". No (3)
- 2-3 Replaced the word "guidance" with "direction" in paragraph 2.2.1. No (3)
- Deleted paragraph 2.2.3(a) as this statement has been previously stated (see addition page 1-4). Following this paragraph 2.2.3 was changed to (a). No (1)
- Replaced the word "lists" with "identifies the" in the first sentence of the last paragraph on this page. No (3)
- 2-4 Deleted "designated" following "Experienced" in the last paragraph, first sentence. No (1)
- 2-5 Deleted the words "and on the job training" following "indoctrination" in the first sentence, first paragraph on that page. No (2)
- Added "sponsored" following "year" in the second sentence, first paragraph on that page. No (3)
- 2-6 Replaced the words "acceptance testing" with "dedication" in the sixth line this page. No (3)
- 2-7 Replaced the words "The following clarification statement is provided" with "However" in the first line, first sentence on this page. No (1)
- Deleted subparagraph 2.3.2(a) as this wording is redundant (see addition to page 1-4). Following paragraphs were redesignated (a) through (d). No (1)
- Replaced words "will be set forth by" with "are defined in" in the first sentence of new section 2.3.2(b). No (3)

2-8	Added the word "work" following "included in the" in the first sentence of new section 2.3.2(c). In the last sentence of the same paragraph, changed "which" to "to" following "be established".	No (3)
2-11	Added the words "and services" following "equipment" in the next to last sentence of the first paragraph of section 2.4.	No (3)
	In that same paragraph, replaced the words "supplied to the purchaser" with "specified and provided to the District" in the last sentence.	No (3)
2-11/12	Deleted the words "in general" in the second paragraph of section 2.4 and replaced the words "in the event that procurement is" with "additional special controls may be".	No (3)
2-12	Deleted the words "some additions may be necessary to provide adequate control" at the end of the second paragraph of section 2.4.	No (1)
	Added the words "and essential-commercial grade" following "essential" in the third paragraph of section 2.4.	No (3)
	Replaced "have" with "implement" following "supplier" in the second line, third paragraph.	No (3)
	Added the words "(with the exception of those suppliers performing all work at Cooper Nuclear Station or in the Columbus General Offices)" following the words "Appendix B", third paragraph.	No (3)
	Replaced the words "or an equivalent program which assures the necessary level of quality (as determined by NPPD QA)" with "All safety-related suppliers shall appear on the applicable section of the NPPD Approved Suppliers List", in the third paragraph on this page.	No (3)
2-14	Deleted the word "routinely" following "forwarded" in the last sentence of the first paragraph of section 2.5.	No (1)
2-14/15	Replaced "(G.O.)" in the first paragraph section 2.6 and paragraph 2.6(a) with "(CGO)".	No (1)

2-15	In paragraph 2.6(b) changed "Columbus G.O." to "CGO"; replaced "so that" with "to enable"; replaced "which" with "the proper" following "determine"; replaced "are applicable to" with "to be used in" following "documents"; and deleted "and whether the documents at hand are of the latest revision" at the end of the paragraph.	No (1)(3)
2-15	Replaced "G.O." with "CGO" in the tenth line on this page.	No (3)
2-16	Deleted the word "Appropriate" from the beginning of the next to last sentence of paragraph 2.6.1(a).	No (1)
	Replaced the words "special acceptance testing" with "dedication" in line 5 of the first paragraph 2.7.	No (3)
	Replaced "NPPD procedures covering procurement" with "Quality Assurance Instructions" in the second paragraph Section 2.7.	No (1)(3)
	Deleted "supplier" from the same paragraph following "provide for".	No (1)
	Replaced "to determine the" with "of" following "evaluation" first sentence same paragraph.	No (3)
	Replaced "effectiveness" with "to determine effectiveness" following "quality program" same sentence.	No (3)
	Replaced "procedures" with "instructions" in next sentence, same paragraph.	No (1)
2-18-19	Deleted the words "as necessary" at the end of the second sentence of the first paragraph of section 2.9. The third and fourth sentences have been reworded to be more concise.	No (1)
2-19	Replaced "the" with "established" following "special processes within" and deleted the words "necessary for satisfactory accomplishment of design objectives" from the second paragraph in section 2.9.	No (1)(3)
2-20	Replaced "made of" with "conducted for" following "will also be" in the second sentence of second paragraph, section 2.10.	No (3)
	In same sentence, replaced "involved in" with "such as".	No (3)

	In same sentence, deleted "of performers" following "qualification".	No (1)
2-21	In paragraph 2.10.1.(b), second sentence, changed the word "vendor" to "supplier".	No (3)
	In the first sentence of paragraph 2.11.1 replaced the words "carried out" with "performed".	No (3)(1)
	Added the word "date" following the word "test performer" in the fourth sentence of the first paragraph of section 2.11.	No (3)
	Deleted the words "and performance by appropriately trained personnel" following next to last sentence , paragraph 2.11.1	No (1)
2-21/22	Replaced "carried out" with "performed"; deleted "station" from in front of "Quality Assurance"; and replaced "limits prescribed for" with "specified" in paragraph 2.11.2.	No (3)
2-22	Added the words "and that tests are being performed by appropriately trained personnel" following "acceptance criteria" in the first sentence of the last paragraph of section 2.11.	No (3)
	Deleted "connection with" following "used in" in the first sentence of the first paragraph, section 2.12.	No (1)
	Replaced "utilized in" with "required for" in the second sentence of the second paragraph section 2.12.	No (3)
	Replaced "carried out" with "performed" in the third paragraph, first sentence Section 2.12. In the same paragraph, second sentence, deleted "and will be verified by" following "activities", replaced "to assure" with "will verify", and replaced the words "carried out" with "followed".	No (3)
	Added the words "and test" following "measuring" in the third sentence of the same paragraph.	No (3)
2-23	Changed "National Bureau of Standards for the the calibration of applicable instrument at the CNS" to "National Institute of Standards and Technology (formally NBS)" in the last sentence of paragraph 2.12.3.	No (3)
	Changed "Scheduled and unannounced audits" to "Scheduled and/or unannounced audits" in the last paragraph of section 2.12.	No (3)

- In the first paragraph, first sentence of section 2.13, deleted the word "necessary" following the words "include the", and replaced the word "to" with "for the" following "requirements". No (3)
- In the first paragraph of section 2.13, changed "include provisions" to "provide"; "inspection" to "surveillance"; deleted the words "activities" and "these"; and also deleted the words "maintained at the station" all in the first sentence of that paragraph. Also, deleted the last sentence of paragraph 2.13.1 which stated "Warehouse personnel shall have the responsibility for carrying out all the requirements specified by the approved station procedures to assure that specific quality requirements are met", as redundant. No (3)
- 2-24 In the paragraph 2.13.1(b), second sentence, replaced the word "highest" with "most stringent" preceding "requirement" and replaced "of" with "for their" in this same sentence. No (3)
- Replaced the word "purchases" with "procurement" and deleted the words "and storage facilities are considerably different" from the end of the third sentence of paragraph 2.13.1(b). No (3)
- Deleted words "measures of" following "requiring special"; and replaced the words "as a part of" with "on" in paragraph 2.13.1.(b). No (3)
- 2-25 In the last sentence of this same paragraph, replaced the words "purchase order" with "procurement" following "handled in the". No (3)
- 2-26 Deleted the words "will be one of the aspects of the work that" from the last paragraph of section of 2.14. No (1)
- Replaced the words "Procedures for control of the warehouse and for control of maintenance activities provide" with "Warehouse and maintenance procedures include requirements" in the first paragraph of section 2.15. Also, added the word "nonconforming" following "tagging of" in that same sentence and deleted "which do not conform to requirements" from the end of that paragraph. No (3)
- Added the word "modification" following "maintenance" in the second paragraph of section 2.15. Also changed the words "Quality Control" to "quality related". No (3)

- 2-27 Deleted the sentence "In addition, a status log of all assigned Nonconformance Reports (NCR's) shall be maintained by the CNS QA Staff" from the end of paragraph 2.15.3. No (4)
- Added the sentence "Deficiencies and/or deviations identified by QA Staff personnel shall be reported on a Quality Assurance finding form" to the end of paragraph 2.15.3. No (3)
- 2-28 In the third full paragraph on this page, first part of sentence, deleted "Any item of" before "essential" and also deleted "which is" following "equipment". No (1)
- In the next paragraph on this page, "compile" was replaced with "issue"; "quarterly" was added before "nonconformance"; "trend" added before "report to"; and "quarterly" and "enable" were deleted following "report". No (3)
- 2-29 In the first paragraph of section 2.16, third sentence, replaced the word "any" with "all" preceding "cases". In the same sentence, replaced the word "repetition" with "recurrence" following "prevent" and deleted "elsewhere in the station" from the end of the sentence. No (3)
- Changed the title of "Division Manager - Engineering and Construction" to "Division Manager - Nuclear Engineering and Construction." No (3)
- 2-30 Replaced the words "such station records" with "quality-related records associated with CNS"; added the words "in accordance" before "with approved" in the third sentence of the first paragraph of section 2.17. Replaced the words "will consist of" with "include", replaced the words "plus the" with "and those" following "construction" and, added the words "and modification" following the word "maintenance" all in the fourth sentence of this paragraph. In the fifth sentence, deleted the words "and status of" following "personnel". In the last sentence of this paragraph, replaced the word "taker" with "recorder" following "data"; replaced the word "used" with "issued" following "reports"; and replaced "nonconformances" with "noted deficiencies" at the end of the sentence. No (3)

2-31

In paragraph 2.17.3, combined the two sentences and changed the words "control of the files and/or records" to "procedures"; replaced "include" with "provide for"; and, deleted the words "Such changes to as-built drawings, operating logs, and the like, must" from what was previously the second sentence of that same paragraph. No (3)

Changed the words "G.O. Records Manager" to "CGO Manager of Office Systems Services" and replaced the words "incorporating material" with "receiving records", changed the word "files" to "facilities". Also changed "material from the files" to "records". No (3)

Beginning the first paragraph of section 2.18 added the sentence "Scheduled and unscheduled audits will be performed to verify compliance to CNS QA Program requirements and to determine the effectiveness of the area audited". No (3)

In the second sentence of the first paragraph, replaced the words "principal segment" with "functional area". No (3)

In the second sentence of the second paragraph deleted the words "which are" following "activities" and replaced "carried out" with "performed". No (1)(3)

Added the words "QA personnel" following "performed by"; and deleted the words "of higher echelons" following "direction", all in the second sentence of the first paragraph of section 2.18. No (3)

Added the word "directly" following "trained personnel not" in the last full sentence of this page. No (3)

Changed the first part of the last sentence beginning on this page from "In addition, other members of the NPPD Executive Management staff may audit or" to "NPPD Management may". No (1)

Reworded part of the last sentence on this page from "...will necessarily be coordinated in such a way as to avoid unnecessary interference" to "will be coordinated to avoid interference". No (1)

2-32

Deleted the sentence "It is expected that some unannounced audits will be conducted, particularly with regard to those operating activities such as emergency procedures and operator qualifications", in the middle of paragraph 2.18.1. No (1)

- Changed the word "nonconformances" to "audit findings" in the next to last sentence of the first paragraph of section 2.18. In this same sentence, deleted the words "as a result of these audits" following "identified". No (3)
- In the last sentence of this paragraph, changed the words "of any identified nonconformance area and" to "to" and changed the word "verification" to "verify". No (1)
- In the first paragraph of section 2.19, reworded the paragraph from "Other ANSI Standards which are applicable to the CNS Operational QA Program which are not necessarily related to any of the previously identified criteria of this section, are identified as follows:" to "ANSI Standards applicable to the CNS QA Program for Operation not directly related to the preceding sections, are discussed in this section:". No (1)
- 2-34 Deleted the sentence "Flushing is an additional precaution to ensure system cleanness" following the second sentence of paragraph 2.19.1.a.6.b. No (1)
- 3-1 In the second paragraph, section 3.1. replaced the words "carried out" with "implemented". No (3)
- In the last sentence of the third paragraph, section 3.1., changed the words "for operating the nuclear station" to "for the operation of Cooper Nuclear Station". No (3)
- 3-4 In the second full paragraph on this page, first sentence, deleted "personally" following "shall"; deleted the words "himself that the District is" and replaced "complying" with "compliance". No (1)
- Deleted the last part of the first sentence of the fourth paragraph of section 3.2.3 which stated "which will meet the requirements of applicable federal regulations, codes, quality standards and other safety and environmental conditions that are required to assure safe and reliable nuclear power plant operations". No (1)
- 3-5 In the first sentence, first paragraph of section 3.2.4, added the words "Operation at" following "Program for". No (3)

	Deleted the last half of the first sentence of the first paragraph of section 3.2.4 which stated "Operation which will meet the requirements of applicable federal regulations, codes, quality standards, and other safety and environmental conditions that are required to assure safe and reliable nuclear power plant operations".	No (1)
	Deleted "identified at CNS to the station" in line 16 following "open audit items".	No (1)
	Also, deleted the last sentence of the second paragraph of section 3.2.4, "In addition, the administrative functions associated with the CNS QA Staff are under the direction of the CNS QA Manager".	No (1)
3-6	In the last paragraph of section 3.2.4 changed the words "one of the CNS QA Supervisors" to "an individual from his staff".	No (3)
	In the last line on this page, replaced "G.O." with "CGO".	No (3)
	Deleted the last half of the first sentence of the first paragraph section 3.2.5 which states "which will meet the requirements of applicable federal regulations, codes, quality standards and other safety and environmental conditions that are required to assure safe and reliable nuclear power plant operations".	No (1)
3-7	Deleted the words "regarding authority to initiate, review, comment and issue the various plans and instructions" at the end of the first sentence of the first paragraph on this page.	No (1)
	In Line 9 changed "G.O." to "CGO".	No (3)
	In Line 11 added the words "and services" following "spare parts".	No (3)
	Deleted the last sentence of first paragraph "In addition, the administrative functions associated with the General Office QA Staff are under the direction of the General Office QA Supervisor."	No (1)
	In the second paragraph changed "G.O." to "CGO"; deleted the words "in the G.O." following "program" and added "in the CGO," following "function"; deleted "This will" following "CGO" and changed "include" to "including".	No (3)

- In the third paragraph, deleted "specific" following "Additional"; changed "shall be" to "are" and deleted "issued in accordance with Section 4.0 of this Policy Document" from the end of this paragraph. No (3)
- 3-8 In the first sentence of section 3.2.6, changed "reporting administratively" to "report" following "Supervisors"; reworded "to assist in carrying out the duties" to "for the performance of work activities"; and changed "to" to "by" before "the CNS QA Manager". No (3)
- At the end of the last sentence of section 3.2.6 added the words "CNS QA" before " Department". No (3)
- In the first paragraph of section 3.2.7, under subheading General Office Quality Assurance Staff, second sentence, changed "verify" to "verification" following "Assurance"; and changed the words "and perform" to "and for the performance of". No (3)
- In the first sentence of the second paragraph, same subheading, changed the words "a G.O." to "CGO QA" following "designated". Combined the first and second sentences and deleted "This includes the" from the beginning of the second sentence. No (3)
- 3-8/9 In the same paragraph of section 3.2.7, same subheading, added "properly" before "included" and replaced the words "with safety-related systems or equipment requisitions generated by Nuclear Engineering and Construction or Nuclear Support" with "and, development of a QA engineering program". No (3)
- 3-9 In the first paragraph of subheading CNS Quality Assurance Staff under section 3.2.7, first sentence, replaced "which could affect" with "affecting" and deleted "specific" from the first part of the last sentence of this paragraph. No (3)
- In the second paragraph of this same section, first sentence, changed "either the CNS or" to "both the CNS and" following "jointly by". In the last sentence of this paragraph, added "/Supervisor" following "Assurance Manager". No (3)
- 3-9 Replaced the words "General Office Quality Assurance Secretary" with "Secretary to the Division Manager of QA" in said subheading. In the paragraph that follows, the same title change was made along with the addition of "and documenting" following "administering"; and also added "QA No (3)

program" before "document. Deleted the words "and retrieval and records of distribution retrieval" from the first sentence and deleted the entire second sentence "In addition, the Secretary shall be responsible for the preparation of administrative procedures which control and maintain NPPD Columbus G.O. QA files".

- 3-10 In the first paragraph of section 3.2.8 under subheading Division Manager - Nuclear Engineering and Construction in the third sentence, replaced "identified nonconformances will be" with "quality-related problems shall be identified and". No (3)
- 3-11 In section 3.2.10 deleted the letters "QA" preceding "activities" and changed the words "as defined by this and other approved" to "under his control are conducted in accordance with this" and deleted the words "Documents are compiled within his areas" from the end of that same sentence. In the last sentence of that same paragraph added the words "but is not limited to" following "This includes". No (3)
- 3-12 Added the words "the CNS Procedures Manual," following "are described in" in the first sentence of section 3.3. No (3)
- In the same section, second sentence, replaced the words "charged with the responsibility" with "responsible"; and added "and modified" following "maintained"; and deleted the last part of this sentence "and such responsibilities include Quality Control functions" following "procedures". No (3)
- In section 3.4, in the subheading, changed "G.O." to "CGO". This correction is made throughout the paragraph where "G.O." was listed. No (3)
- Added the word "modification" following "procurement" in the second sentence of section 3.4. No (3)
- 3-14 In the third sentence, first paragraph of section 3.7 added "or CGO" following "normal station". In the fourth sentence of this same paragraph, replaced the words "demonstrate that it has" with "maintain" preceding "a Quality Assurance". No (3)

- Added the sentence "All suppliers, contractors and consultants performing work classified as essential shall be maintained on the appropriate section of the CNS Approved Suppliers List" following the fourth sentence of section 3.7. No (3)
- 3-15 In the third paragraph of section 3.7, added the words "the appropriate" before "QA requirements" and deleted "consistent with this program" in the last part of this paragraph. In the first line of the fourth paragraph, deleted "Additionally the" and "organization" and combined paragraphs 3.7.3 and 3.7.4. No (3)
- In the fifth paragraph of section 3.7, first sentence, deleted the words "outside suppliers or contractor"; and replaced "the" with "outside" following "Cooper Nuclear Station"; and added "consultants" following "contractor" all in the same sentence. No (3)
- Also, in the same sentence deleted "coordination" following "interface"; deleted "personnel" following "contractor"; and replaced "staff" with "personnel" following "station". No (3)
- In the third paragraph on this page, replaced the words "As necessary to execute this QA Program, the District may obtain the services of a qualified consultant. When non-NPPD support is obtained, total" with "At all times when outside suppliers, contractors and consultants are obtained to assist in the execution of this QA program, the". No (3)
- 4-1 Section 4.0 paragraph has been reworded as shown. Also, section 4.1 has been completely reworded as shown. No (3)
- 4-2 In section 4.1.1, first paragraph, first sentence, replaced "must" with "shall" following "Inspection function". No (3)
- In section 4.1.1, second paragraph, first sentence, added "adequate" before "Quality Control"; replaced "have been" with "are" following "inspections"; and changed "directly into, or by attachments to," to "directly in, or attached to," No (3)

4-4

Deleted the first part of the first sentence of section 4.1.2, "In order to comply with 10CFR50, Appendix B, and this policy document"; deleted "additional" following "Staff shall prepare"; and also deleted the words "which shall be" following "QAI's".

No (3)

Reworded the second paragraph of section 4.1.2 to become the second sentence of a one paragraph section. This new sentence reads "As previously described in section 1.5 of this document, QAI's defined QA division work activities".

No (3)

In the first sentence of the first paragraph of section 4.1.3, deleted the word "additional" following "Staff shall develop". At the beginning of the second sentence of the same paragraph, added the words "As described in section 1.5 of this document," prior to "These QA Plans".

No (3)

In the same paragraph, deleted the first part of the fourth sentence "As a general guideline in defining the scope of the QA Program, there shall be"; added the words "shall be developed" following "A QAP"; and also added the words "defining the scope of the QA program" to the end of this same sentence.

No (3)

In the second paragraph of section 4.1.3, deleted the words "A guide for" at the beginning of said paragraph.

No (3)

4-5

In the fourth paragraph of section 4.1.3, at the end of the paragraph, replaced the words "carried out" with "implemented".

No (3)

In the first paragraph of section 4.1.3(a), replaced "check" with "verification" and "should not" with "are not intended to"; and replaced "one for one, the" with "QC Inspection"; deleted the words "performed for Quality Control Inspection purposes" following "activities"; changed the word "will" to "may" following "duplication"; and replaced the words "incidental to the performance of independent observations made to" with "in the effort to".

No (3)

In the following paragraph, replaced "in effect and is functioning as intended" with "being effectively implemented". Deleted the words "of these types of deficiencies" from the end of the same paragraph.

No (3)

4-6	<p>In the first paragraph on this page, deleted the words "to be carried out under each QAP" from the first sentence. Also, deleted the word "appropriate" following "prescribed in" from the second sentence. In the second paragraph on this page deleted the words "schedule of the" in the second sentence prior to "work" and replaced "so that the QA Surveillance will have" with "to ensure".</p>	No (1)
	<p>In the first paragraph of 4.1.3(b) deleted the first part of the first sentence "As required by 10CFR50, Appendix B" and replaced "carried out" with "implemented" following "audits shall be".</p>	No (3)
	<p>Added the sentence "The audits are supplemented by regular surveillances, the results of which become part of the final audit package" following the second sentence of the first paragraph of section 4.1.3(b).</p>	No (3)
5-1	<p>From the fourth paragraph of section 5.0, deleted the words "of this Three Level Quality Assurance Program for Operation" following "implementation", and "the body of" before "QAI's".</p>	No (1)
5-2	<p>In the third paragraph on this page, changed the words "which will" to "to" following "schedule" and replaced the word "evidence" to "provide for" following "practices clearly".</p>	No (3)
	<p>In the fourth paragraph on this page, changed the word "must" to "shall" following "action on deficiencies"; changed the title "Vice President-Nuclear" to "Vice President-Power Production"; and changed the word "yearly" to "annually".</p>	No (3)
6-1	<p>In the first paragraph of section 6.0 changed the word "G.O." to "CGO".</p>	No (3)
8-1	<p>New QA Division organization.</p>	No
9-4	<p>Changed "<u>Quality Control & Inspection</u>" to "<u>Work Performance & Quality Control</u>" in title of paragraph (a).</p>	No (3)
	<p>Added "Each person.... quality practices and procedures" to begin paragraph (a).</p>	No (3)
	<p>Deleted "<u>Quality Assurance</u>" from title of paragraph (b).</p>	No (3)
	<p>Added "Supervision and management... quality work" to begin paragraph (b).</p>	No (3)

In second sentence of paragraph (b), changed "The Quality Assurance" to "These" before "Managers". No (3)

At the end of paragraph (b), added the sentence "This includes verification that activities are properly performed and procedures are adequate for the activity they prescribe." No (3)

In first sentence of paragraph (c), deleted "generally" following "audits are" and added "directly" before "involved". No (3)

KEY

- (1) Redundant or unnecessary wording.
- (2) On the job training provided by each employee's respective supervisor, not by the Nuclear Training Department.
- (3) Clarified wording.
- (4) This activity is now the responsibility of CNS Operations.