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**Northeast
Utilities System**

Memo

NO-99-0228

November 23, 1999

TO: Northeast Utilities Quality Assurance Program Topical Report Controlled
Copyholders

FROM: 
D. S. Bruce

SUBJECT: NUQAP Topical Report Revision 21, Change 6
(Document No. MP-02-OST-BAP01)

Enclosed is NUQAP Revision 21, Change 6. This change clarifies in Section 1.5 and Section 2.2.6 that the SVP & CNO has delegated the responsibility for the Management Quality Assurance Review to the VP-NORA

Please replace the entire contents of the existing Quality Assurance Program, Sections 1.0 and 2.0, with the enclosed sections.

Change 6 changes are in ***bold and italics*** with a revision bar in the right margin. The footer of the affected section will include a reference to Change 6.

Please insert the summary of changes document in the front of your manual. Please note the effective date of the change is **November 23, 1999**.

If you have any questions, contact D. Bruce at X3185.

Attachments:

1. Summary of changes incorporated as part of Revision 21, Change 6.

Enclosure:

Change 6 to the Northeast Utilities Quality Assurance Program Topical Report Revision 21.

Summary of Changes to NUQAP Rev. 21 Incorporated as Change 6

<u>Section</u>	<u>Summary Description of Changes</u>	<u>Reference</u>
Section 1.0	Clarifies in Section 1.5 that the SVP & CNO has delegated the responsibility for the Management Quality Assurance Review to the VP-NORA.	Request 99-18
Section 2.0	Clarifies in Section 2.2.6 that the SVP & CNO has delegated the responsibility for the Management Quality Assurance Review to the VP-NORA.	Request 99-18

1.0 ORGANIZATION

1.1 INTRODUCTION

This section describes the organizations involved in the operation and technical support of Units 2 and 3 at Millstone Nuclear Power Station (MNPS). In addition, this section describes the responsibilities governed by the Northeast Utilities (NU) Quality Assurance Program (NUQAP). Qualifications for key personnel are found in the unit Technical Specifications and Appendix B, "Qualification and Experience Requirements."

NOTE

In the remainder of QAP 1.0, the text describes station - wide functions that support Millstone Units 2 and 3. Units 2 and 3 organizations may supply services to, or use services from, the Unit 1 organization, with appropriate controls. Unit 1 is defueled and in a decommissioning mode.

Additional information on organizations supporting Unit 1, and on the quality assurance program for Millstone Unit 1, is provided in the Millstone Unit 1 Northeast Quality Assurance (NUQAP) Topical Report.

1.2 ORGANIZATION

The Chairman, President and Chief Executive Officer (CEO) of NU has ultimate responsibility and overall authority for the NU nuclear program, and is the Chairman of Northeast Nuclear Energy Company (NNECO), the licensed operator of Millstone Units 1, 2 and 3. The Chairman of NNECO has delegated the necessary responsibility and authority for all nuclear operations to the President and CEO-NNECO. In addition, Northeast Utilities Service Company (NUSCO) provides certain support services to NNECO. The President and CEO-NNECO is also the President-Generation Group of NUSCO.

1.3 KEY MANAGEMENT RESPONSIBILITIES AND AUTHORITY

1.3.1 Senior Vice President and CNO-Millstone (SVP & CNO)

The SVP & CNO has been delegated by the President and CEO-NNECO the necessary responsibility and authority for the management and direction of all activities related to the operation of MNPS. The SVP & CNO has overall responsibility for engineering, construction, operation,

maintenance, modification and quality assurance including this NUQAP, at MNPS. The following report directly to the SVP & CNO:

- Vice President (VP)-Nuclear Operations
- VP-Engineering Services
- VP-Site Services
- VP-Human Services
- VP-Nuclear Oversight and Regulatory Affairs (NORA)

1.3.2 VP-Nuclear Operations

VP-Nuclear Operations is responsible for establishing common policies and standards pertaining to the operating units, the safe operation and maintenance of the units, and implementation of this NUQAP. The VP-Nuclear Operations is responsible for maintaining compliance with requirements of the Operating License and Technical Specifications as well as applicable federal, state and local laws, regulations and codes. The following report directly to the VP-Nuclear Operations:

- Station Director
- Work Management
- Maintenance

1.3.3 VP-Engineering Services

VP-Engineering Services is responsible for providing engineering services and implementation of this NUQAP. The following report directly to the VP-Engineering Services:

- Design Engineering
- Nuclear Engineering
- Plant Engineering

1.3.4 VP-Site Services

VP-Site Services is responsible for site services in support of the station, and implementation of this NUQAP. The following report directly to the VP-Site Services:

- Site Services
- Nuclear Materials and Document Management
- Unit 1 General Manager

1.3.5 VP-Human Services

The VP-Human Services is responsible for emergency planning and nuclear training, and implementation of this NUQAP. The following report directly to the VP-Human Services:

- Nuclear Training Services
- Emergency Planning

The VP-Human Services is also responsible for the employee concerns program and human services, and for these two responsibilities, the VP-Human Services reports to the President and CEO-NNECO.

1.3.6 VP-Nuclear Oversight and Regulatory Affairs (NORA)

VP-NORA is responsible for the effective performance of Nuclear Oversight and Regulatory Affairs functions. The VP-NORA acts as advisor to the SVP & CNO and President and CEO-NNECO on items related to nuclear quality and safety at the station. Overall responsibility for the NUQAP has been delegated to the VP-NORA by the SVP & CNO. These responsibilities include:

- Direction of the quality assurance program
- Development and implementation of policies, plans, requirements, procedures, and audits
- Verification to assure compliance with 10CFR50 Appendix B and other regulatory requirements
- Verification of the implementation of the NUQAP Topical Report requirements

The following report directly to the VP-NORA:

- Director-Nuclear Oversight

1.3.7 Director-Nuclear Oversight

The VP-NORA has delegated to the Director-Nuclear Oversight the necessary authority and responsibility for the following:

- Preparation and issuance of the NUQAP Topical Report
- Verification of the implementation of NUQAP requirements and of compliance with 10CFR50 Appendix B and other regulatory requirements
- Identification of quality problems
- Recommendations or solutions to quality problems and verification of the implementation of the solutions
- Independent Safety Engineering and Operating Experience programs

Verification is performed through a planned program of audits, surveillances and inspections by Nuclear Oversight. The Director-Nuclear Oversight provides objective evidence to management of the performance of quality activities independent of the individual or group directly responsible for performing the specific activity.

The Director-Nuclear Oversight has the authority and organizational freedom to verify activities affecting quality. This is performed independent of undue influences and responsibilities for schedules and costs.

In order to implement these responsibilities, the Director-Nuclear Oversight is provided "Stop Work" authority whereby he/she can suspend unsatisfactory work and control further processing or installation of non-conforming materials. The authority to stop work is assigned to Nuclear Oversight personnel and delineated in an approved procedure.

1.3.8 Station Director

The Station Director is responsible for operations, nuclear safety, chemistry, and radiation protection activities. The Station Director is responsible for the safe and efficient operation of the units. During accident situations, if currently holding an active SRO license on the unit, the Station Director may relieve the Shift Manager of the responsibility of directing the licensed Control Room operators. The following report to the Station Director:

- Assistant Station Director-Safety
- Unit Operations
- Radiation Protection and Waste Services

1.3.9 Work Management

The Work Management group is responsible for on-line maintenance, cost and scheduling, and outage activities. Responsibilities include the scheduling of surveillances required by Technical Specifications.

1.3.10 Maintenance

The Maintenance group is responsible for installation, maintenance, alterations, adjustment and calibration, replacement and repair of plant electrical and mechanical equipment, and instruments and controls. Responsibilities include establishing standards and frequency of calibration for instrumentation and ensuring instrumentation and related testing equipment are properly used, inspected and maintained.

1.3.11 Design Engineering

The Design Engineering group is responsible for design engineering functions, supporting activities, and engineering programs. The Unit 1 organization will share responsibility for certain systems shared between Unit 1 and Units 2 or 3.

1.3.12 Nuclear Engineering

The Nuclear Engineering group is responsible for engineering activities in configuration management, safety analysis, and nuclear fuel. These activities include probabilistic risk assessment, radiological and radwaste engineering, design and configuration control and engineering assurance.

1.3.13 Plant Engineering

The Plant Engineering group is responsible for engineering technical support and systems engineering, including reactor and material engineering.

1.3.14 Site Services

The Site Services group is responsible for services in support of the station, including security and fire protection.

1.3.15 Nuclear Materials and Document Management

The Nuclear Materials and Document Management group is responsible for nuclear records management and procurement. Responsibilities include approval and oversight of vendors that provide quality-related material and services including source and receipt inspection.

1.3.16 Nuclear Training Services

The Nuclear Training Services group is responsible for operator and technical training. The operator training group reports directly to the Director-Nuclear Training Services to provide sufficient organizational freedom and independence from operating pressures as required by the unit Technical Specifications.

1.3.17 Emergency Planning

The Emergency Planning group is responsible for development and maintenance of the on-site radiological emergency plan and the development and coordination of required off-site radiological emergency response plans.

1.3.18 Assistant Station Director-Safety

The Assistant Station Director-Safety is responsible for the corrective actions program, procedures, and the shift technical advisors.

1.3.19 Unit Operations

The Unit Operations groups report to the Station Director. Each group includes the following key supervisory positions:

- Manager-Operations
- Assistant Manager-Operations
- Shift Manager(s)
- Unit Supervisor(s)

1.3.19.1 Manager-Operations and Assistant Manager-Operations

The Manager-Operations provides general supervision for the operation of the respective unit, and coordinates unit operations with maintenance, work management, and other groups. As stipulated in Technical Specifications or in Appendix B, the Manager-Operations or the Assistant Manager - Operations holds an appropriate license on the Unit (SRO on Units 2 and 3). The Manager-Operations assures the safe and efficient operation of the assigned unit in accordance with applicable licenses, operating instructions and procedures, emergency procedures and safety rules and regulations. During accident situations, if currently holding an active SRO license on the unit, the Manager-Operations may relieve the Shift Manager of the responsibility of directing the licensed Control Room operators. The Manager-Operations delegates the necessary authority and responsibility for various duties to the Assistant Manager-Operations.

1.3.19.2 Shift Manager

The Shift Managers report to the Assistant Manager-Operations and are responsible for the Control Room command function. The Shift Manager holds an appropriate license on the unit (SRO on Units 2 and 3). The Shift Manager directs and supervises the operation of the unit. Administrative functions that detract from or are subordinate to the management responsibility for assuring the safe operation of the plant are delegated to other operational personnel not on duty in the Control Room.

During accident situations, unless properly relieved, the Shift Manager remains in the Control Room and directs the activities of the licensed operators. The Shift Manager has direct authority to shut down the respective unit if, in the Shift Manager's opinion, serious abnormal conditions exist. A Unit 3 Shift Manager fulfills the facility staff requirements of the Shift Supervisor for the Unit 3 Technical Specifications.

1.3.19.3 Unit Supervisor

The Unit Supervisor holds an appropriate license on the unit (SRO on Units 2 and 3) and supervises the operators in the Control Room. The Unit Supervisor directs activities of the licensed Control Room operators, and may operate the controls of equipment and piping systems from the Control Room or alternate station control location.

1.3.19.4 Control Operators

Control Operators hold a Reactor Operator or Senior Reactor Operator license on the unit. The Control Operators are responsible to perform the following duties:

- Start up, operate, and shut down nuclear plant equipment including, but not limited to, reactor, reactor auxiliaries, turbine generator unit and its auxiliaries as necessary to satisfy system requirements or station conditions
- Test, as scheduled, control room instruments and controls
- Maintain required logs and calculations, observe these logs for indications of faulty operation, and notify the on-duty Unit Supervisor or the Shift Manager of abnormal plant conditions

1.3.19.5 Plant Equipment Operators

Plant Equipment Operators are responsible to perform the following duties:

- Start up, operate, inspect, adjust, and shut down all auxiliary and other various plant equipment
- Perform or assist with scheduled operational tests
- Make minor repairs

1.3.20 Radiation Protection and Waste Services

Radiation Protection and Waste Services group carries out health physics functions and reports to the Station Director to provide sufficient organizational freedom and independence from operating pressures as required by the unit Technical Specifications. The Manager-Radiation Protection and Waste Services fulfills the "Health Physics Manager" position qualifications required by the unit Technical Specifications. Radiation protection services include the following:

- scheduling and conducting radiation surveys including contamination sample collection

- determining contamination levels and assigning work restrictions through radiation work permits
 - maintaining records and reports on radioactive contamination levels
 - administering the personnel monitoring program and maintaining required records in accordance with federal and state codes
- Radiation Protection and Waste Services is also responsible for radioactive waste services.

1.4 QUALITY-RELATED RESPONSIBILITIES COMMON TO ALL DEPARTMENT HEADS

The head of each department performing quality activities is responsible for:

- Administering those activities within their organization which are required by this NUQAP;
- Ensuring implementation of the Quality Assurance Program;
- Establishing and clearly defining the duties and responsibilities of personnel within their organization who perform quality activities;
- Planning, selecting, and training personnel to meet the requirements of the NUQAP Topical Report; and
- Performing and coordinating quality activities within their department and interfacing with the Nuclear Oversight department.

Each individual performing or verifying activities affecting quality is responsible to conduct those activities in accordance with the requirements of this NUQAP and implementing procedures. These individuals shall have direct access to such levels of management as may be necessary to perform this function.

The responsibility, authority, and organizational relationship for performing quality activities within each organization is established and delineated in the NUSCO/NNECO organizational charts, policy statements, and written job or functional descriptions.

Vendors may be delegated the execution of quality assurance functions; however, NU shall retain responsibility for this Quality Assurance Program.

1.5 ANNUAL MANAGEMENT QUALITY ASSURANCE REVIEW

The SVP & CNO is responsible for the assessment of the scope, status, implementation, and effectiveness of the NUQAP. ***To meet this responsibility, a team of qualified individuals is appointed to perform an annual Management Quality Assurance Review.*** The team is made up of individuals knowledgeable in quality assurance, quality activities, auditing, management responsibilities, and the NUQAP Topical Report. This review is:

- A systematic evaluation;
- pre-planned toward the objective of determining the adequacy of the NUQAP and its compliance with Appendix B to 10 CFR 50 and other regulatory requirements; and
- capable of identifying, communicating, and tracking any required corrective action.

The SVP & CNO has delegated the responsibility for the Management Quality Assurance Review to the VP-NORA.

1.6 SPECIFIC NUQAP RESPONSIBILITIES

The SVP & CNO resolves all disputes related to the implementation of the NUQAP for which resolution is not achieved at lower levels within the organization.

1.7 SUCCESSION OF RESPONSIBILITY FOR OVERALL PLANT OPERATION

The succession to responsibility for overall plant instructions or special orders, in the event of absences, incapacitation of personnel or other emergencies, is as follows:

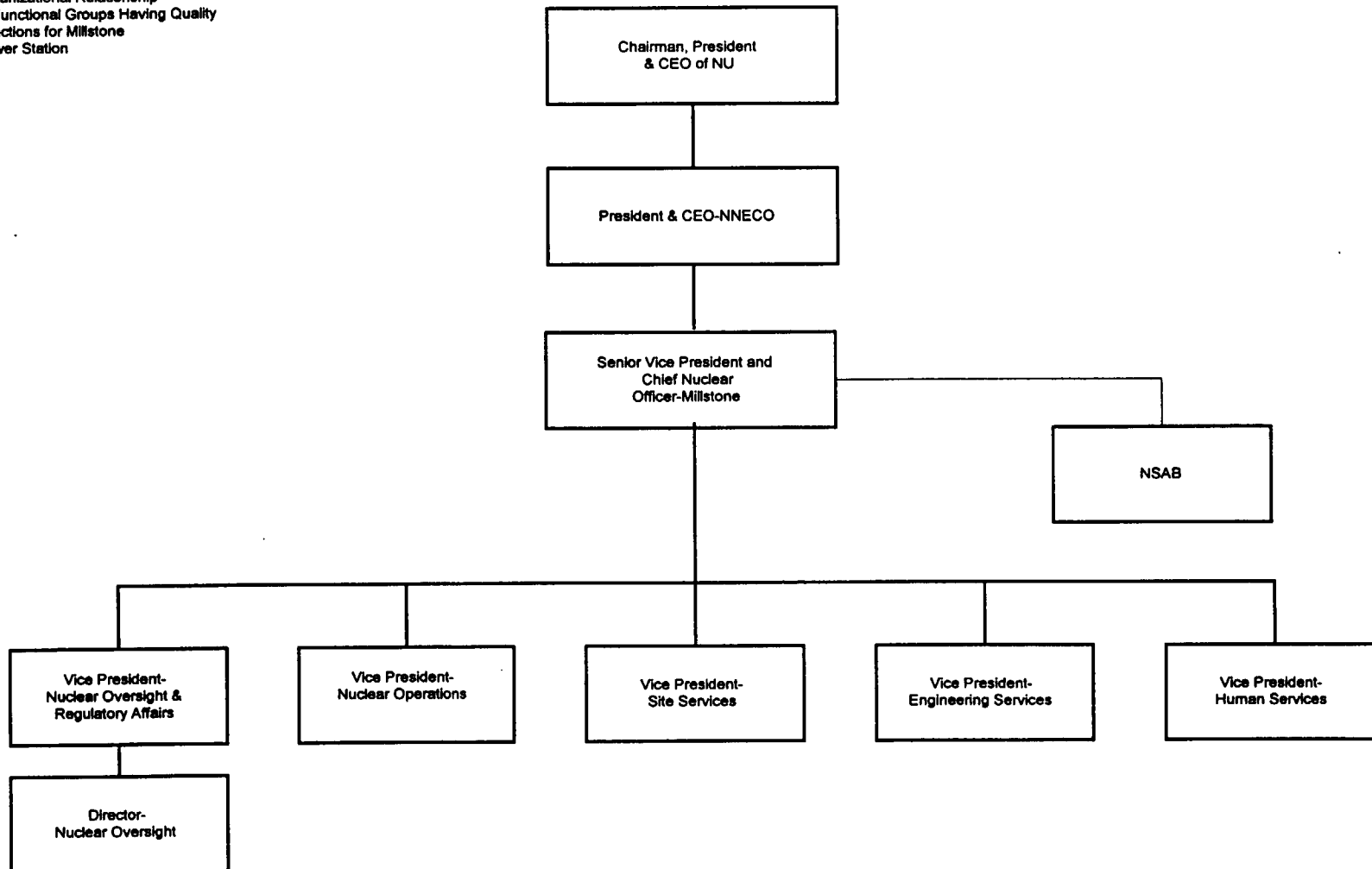
- Vice President-Nuclear Operations
- Station Director
- Licensed Manager-Nuclear Operations or Licensed Assistant Manager-Operations designated by Vice President-Nuclear Operations
- Shift Manager (SRO)
- Licensed Unit Supervisor (SRO)

1.8 ORGANIZATION CHARTS

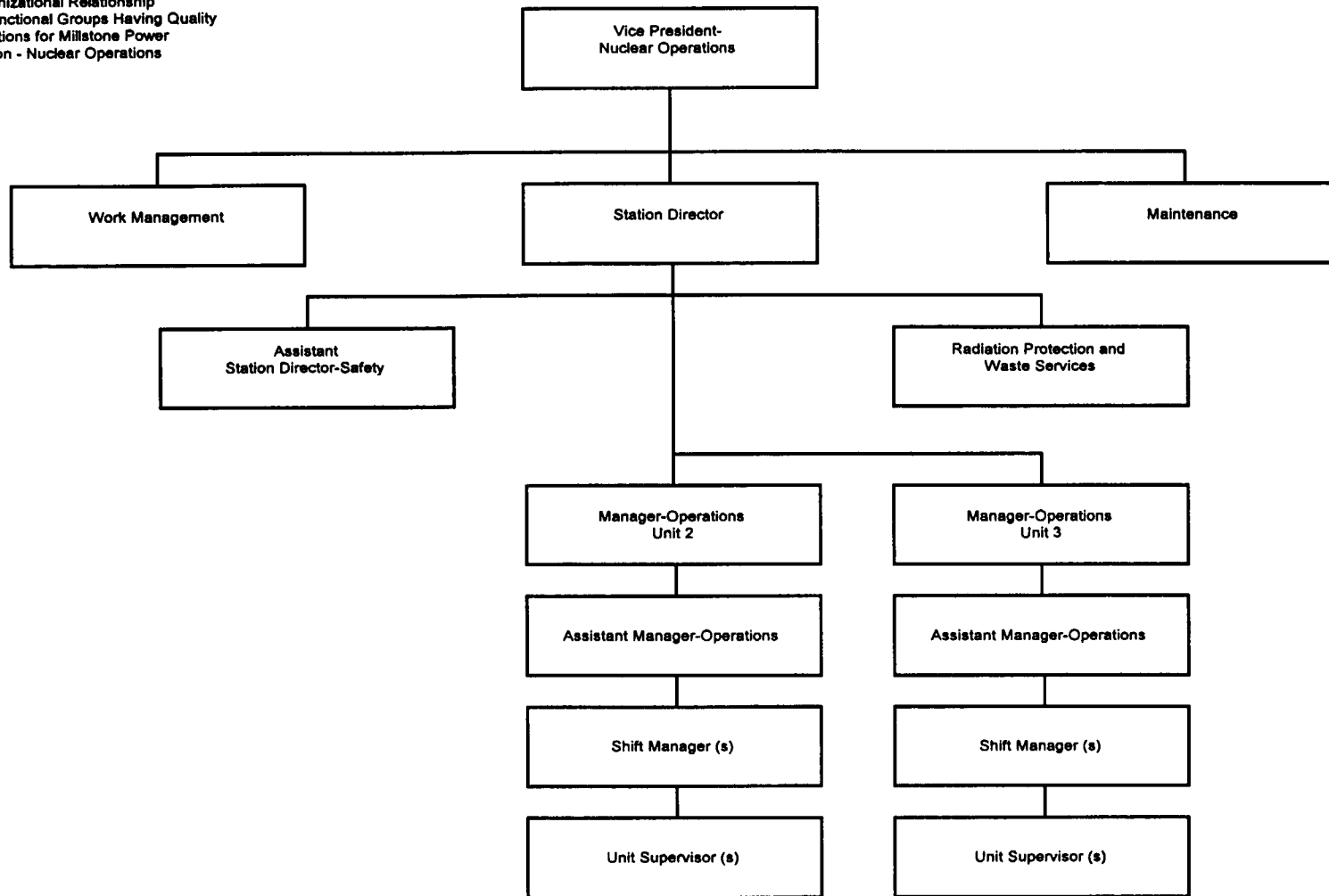
NOTE

The following organization charts are incorporated by reference in the Millstone Station Emergency Plan. Changes to these organization charts require an effectiveness review in accordance with 10 CFR 50.54 (q).

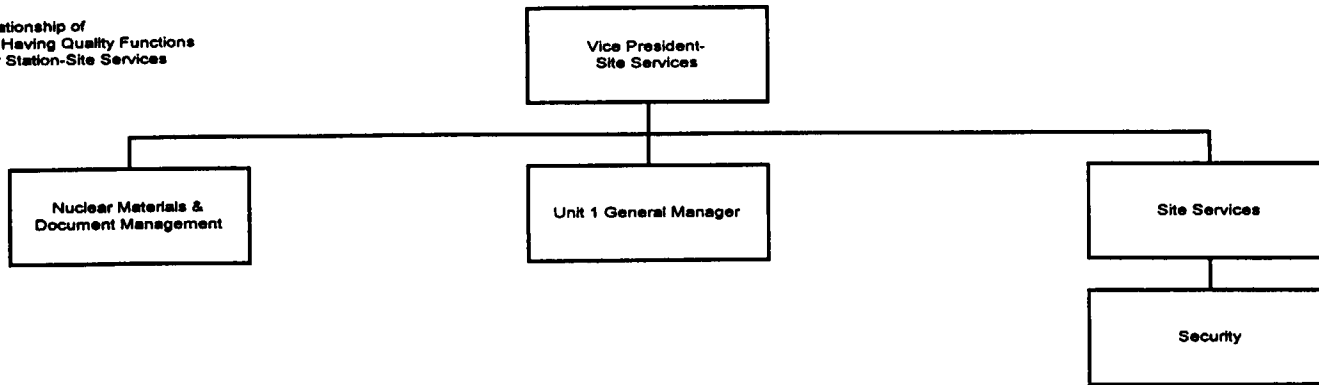
Organizational Relationship
of Functional Groups Having Quality
Functions for Millstone
Power Station



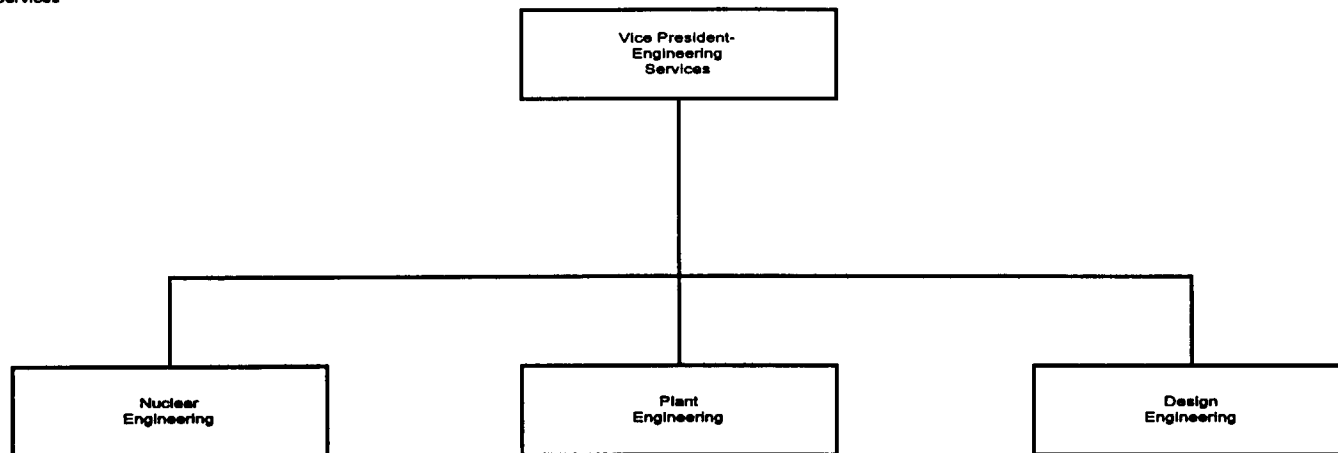
Organizational Relationship
of Functional Groups Having Quality
Functions for Millstone Power
Station - Nuclear Operations



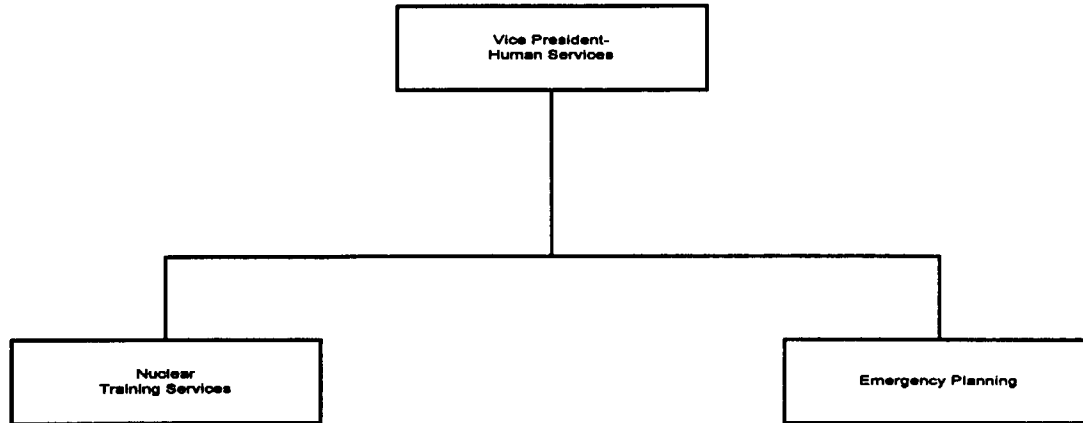
Organizational Relationship of
Functional Groups Having Quality Functions
for Millstone Power Station-Site Services



Organizational Relationship of Functional Groups Having
Quality Functions for Millstone Power Station -
Engineering Services



**Organizational Relationship of Functional Groups
Having Quality Functions for Millstone Power Station -
Human Services**



2.0 QUALITY ASSURANCE PROGRAM

2.1 GENERAL REQUIREMENTS

Northeast Utilities (NU) has established a Quality Assurance Program (NUQAP) for the Millstone Power Station which complies with the criteria of 10CFR50, Appendix B, and follows the regulatory documents and their endorsed ANSI/IEEE standards identified in Appendix C with exceptions as identified in Appendix E. The quality assurance requirements set forth in the attached Policy Statement, supplemented by quality assurance procedures, provide the primary basis of this program and the NU policy with regard to quality assurance for all the Millstone Station nuclear power plants. This NUQAP Topical Report is established to accomplish the required level of quality in activities carried out throughout the life of the Station's operating nuclear power plants.

This NUQAP applies in its entirety to all activities affecting the safety-related functions of structures, systems and components of Millstone Units 2 and 3. Safety-Related structures, systems and components are functionally identified in Appendix A of this NUQAP and are designated Category I by Northeast Utilities. Applicability of Appendix A to each FSAR is addressed by existing Nuclear Unit specific Design Bases and Licensing commitments, and also as specifically identified in each FSAR addressing Section 3.2.1 of Regulatory Guide 1.70. This NUQAP is also applicable in its entirety to materials, equipment, parts, consumables and services designated Category I.

This NUQAP applies to other quality programs including Anticipated Transient Without Scram (ATWS) Quality Assurance, which is applicable to MP-2 only (MP-3 commits to Generic Letter 85-06), and to Electrical Equipment Qualification (EEQ), as defined by NU commitments. Portions of this NUQAP are also applicable to Fire Protection Quality Assurance (FPQA), Station Blackout Quality Assurance (SBOQA) and Radwaste Quality Assurance (RWQA) which are delineated in applicable procedures. Quality Assurance provisions for Millstone Unit 1 are governed by a separate program.

The Materials, Equipment, and Parts List (MEPL) Program provides instructions to identify structures, systems, components, materials, equipment, parts, consumables, quality software and activities that need to be identified as safety-related or augmented quality.

The requirements of this NUQAP are implemented by Northeast Utilities Service Company (NUSCO), the Northeast Nuclear Energy Company (NNECO) which operates Millstone Power Station, and their vendors performing activities affecting quality structures, systems, and components of the Station's nuclear power plants.

Procedures define the required indoctrination and training of personnel performing activities affecting quality, as necessary, to assure that suitable proficiency is achieved and maintained.

Training sessions are documented. The content of the training sessions is described, attendees and attendance date indicated, and the results (e.g., examination results) of the training sessions recorded, as applicable.

Periodic program review of the status and adequacy of this NUQAP is accomplished by Nuclear Oversight audits, surveillances and inspections, by Nuclear Safety Assessment Board (NSAB) reviews, and by the independent review team which performs the annual Management Quality Assurance Review described herein and in QAP 1.0, "Organization", Section 1.5. Organizations outside NU are required to review the status and adequacy of that part of this NUQAP for which they have been delegated responsibility.

2.2 IMPLEMENTATION

2.2.1 GOALS AND OBJECTIVES

The goals of this NUQAP are to maintain quality levels in an effective and efficient manner and to assure a high degree of functional integrity and reliability of Station nuclear power plant quality structures, systems, and components. To meet these goals, the following objectives of this NUQAP have been defined:

- a. Define, through procedures, the quality activities that apply to design, fabrication, procurement, construction, testing, operation, refueling, repair, maintenance and modification of the Station nuclear power plants;
- b. Establish, assign, and document the responsibilities for the conduct of those activities affecting quality structures, systems, and components;
- c. Establish confidence that (a) quality activities for the Station nuclear power plants are performed consistent with NU policies and (b) quality activities are performed by qualified personnel, and are verified through a system of audits, surveillances, and inspections of those organizations with quality responsibilities;
- d. Apprise the Senior Vice President and Chief Nuclear Officer - Millstone (SVP & CNO) of unresolved problems and trends which could have a significant effect on nuclear power plant safety.

2.2.2 PROGRAM DOCUMENTATION

This NUQAP defines the NU nuclear policies, goals, and objectives, and is used as guidance for the development of the various division, department, branch, or section procedures. Revisions to this NUQAP shall be made as needed to reflect current requirements and descriptions of activities prior to implementation. These revisions shall be made in accordance with a NNECO Procedure.

Revisions to this NUQAP, which reduce commitments previously accepted by the NRC, are submitted to the NRC for review and approval prior to implementation.

Revisions which do not reduce previously accepted commitments are periodically submitted to the NRC as required by 10 CFR 50.54 (a)(3) and 10 CFR 50.55 (f)(3).

Quality procedures are developed by the departments performing quality activities. These procedures are reviewed for concurrence by the departments which are responsible for implementing portions of these procedures and are approved by the initiating department. The Nuclear Oversight Department reviews other department quality procedures for compliance with this NUQAP and concurs with such procedures as described in QAP 5.0, "Procedures, Instructions and Drawings". Changes to procedures are subjected to the same degree of control as that utilized in the preparation of the original document.

Each Vice President and Director is responsible for implementation of this NUQAP within their organization which includes individual departmental procedure requirements applicable only to their respective activities. In addition, they are responsible for the preparation, approval, and distribution of those instructions, operating procedures, testing procedures, or other instructions where further guidance is necessary.

2.2.3 STRUCTURES, SYSTEMS AND COMPONENTS

This NUQAP applies to all activities affecting the safety-related functions of the structures, systems and components as addressed in the Safety Analysis Reports (SARs). Safety-Related structures, systems, and components are functionally identified in Appendix A and also as specifically identified in each FSAR addressing Section 3.2.1 of NRC Regulatory Guide 1.70.

For structures, systems and components covered by the ASME Code, NUSCO/NNECO procedures describe the measures taken to assure that the quality assurance requirements contained in the code are supplemented by the specific guidance of the applicable regulatory guides and endorsed ANSI standards listed in Appendix C.

For structures, systems and components, regulatory commitments and NUSCO/NNECO procedures describe the measures taken to assure that the quality assurance requirements are met.

The degree of control over activities affecting quality structures, systems, and components is consistent with their importance to safety. Such controls include use of appropriate equipment, establishment of suitable environmental conditions, and assurance that all prerequisites for a given activity have been satisfied. This NUQAP provides controls over special processes and skills necessary to attain the required quality, and the need for verification of quality by inspection and test.

The Nuclear Oversight Department and applicable NUSCO/NNECO technical organizations jointly determine and identify the extent quality assurance controls are applied to quality structures, systems, and components. The quality assurance controls are in conformance with this NUQAP, which complies with the 18 criteria set forth in Appendix B to 10 CFR 50.

2.2.4 PARTICIPATING ORGANIZATIONS

The organization for Millstone Power Station activities affecting the quality of structures, systems, and components is identified in QAP 1.0, "Organization", which also briefly describes assigned responsibilities.

The Nuclear Oversight Department is responsible for: a) the development, coordination, and administrative control of this NUQAP including coordination of Nuclear Oversight Department procedure review and approval; b) assuring issuance of this NUQAP Topical Report as a controlled document (as described in QAP 6.0, "Document Control", and; c) the review and concurrence with quality procedures and revisions written by other departments. Procedure reviews shall be performed in accordance with QAP 5.0, "Procedures, Instructions, and Drawings".

Northeast Utilities (NU) requires that its approved vendors performing quality activities invoke upon their subvendors, via purchase orders/contracts, requirements for a quality assurance program to meet the applicable criteria of Appendix B to 10 CFR 50, including the applicable elements of the regulatory guides and their endorsed

ANSI/IEEE standards identified in Appendix C. However, NU retains overall responsibility for the Millstone Power Station Quality Assurance Program. The specific quality activities performed by these organizations are specified in the procurement documents. Nuclear Materials and Document Management is responsible for the review and approval of these vendors' quality assurance programs prior to initiation of contracted activities.

The object of the review is to verify that these vendors have an adequate quality assurance program to meet applicable requirements of 10 CFR 50, Appendix B.

In addition to the initial review, Nuclear Materials and Document Management is responsible for the subsequent performance, as appropriate, of audits, surveillances, and inspections of approved vendor's quality assurance programs to assure continued implementation of quality requirements. Nuclear Materials and Document Management assures that the quality assurance programs of vendors that perform quality activities are periodically reviewed to assure that the vendors are implementing adequate programs. Evaluation, review, and monitoring of vendor quality programs is conducted in accordance with section QAP 7.0, "Control of Purchased Material, Equipment and Services".

Vendors may be delegated the execution of quality assurance functions by Contract. These Contracts are reviewed and approved in accordance with this NUQAP. These vendors may be contracted to perform quality activities under their approved quality assurance program or directly under the requirements of this NUQAP.

2.2.5 INDOCTRINATION AND TRAINING

A program is established and maintained for quality assurance indoctrination and training which provides confidence that the required level of personnel competence and skill is achieved and maintained in the performance of quality activities. Quality procedures delineate the requirements for an indoctrination program to assure that personnel responsible for performing quality activities are instructed in the purpose, scope, and implementation of quality procedures and that compliance to these documents is mandatory. Each NUSCO/NNECO Department is responsible for assuring assigned personnel who perform quality activities have been appropriately indoctrinated and trained.

Nuclear training programs shall be developed and implemented to provide training for all individuals attached to or associated with the Station nuclear power plants. Additional guidance is established in NUSCO/NNECO procedures.

Procedures describe the nuclear training program requirements which assure that:

- a. Documentation of formal training and qualification programs includes the objective, content of the program, attendees, date of attendance; and results (e.g., examination results), as applicable.
- b. Proficiency of personnel performing and verifying activities affecting quality is established and maintained. Personnel proficiency is established and maintained by training, examination/testing, and/or certification based upon the requirements of the activity. Acceptance criteria are developed to determine if individuals are properly trained and qualified;
- c. Certificates or other documentation of qualification clearly delineate the specific functions personnel are qualified to perform and the criteria used to qualify personnel in each function.

This program also requires the head of each department to be responsible for a training plan which assures that personnel performing quality activities are trained in the principles and techniques of the activity being performed.

2.2.6 MANAGEMENT PARTICIPATION

Millstone Power Station Vice Presidents and Directors are responsible for implementing this NUQAP within their organization. The Director - Nuclear Oversight will assist in development, coordination, and review of the program.

The SVP & CNO assures that a management review of this NUQAP is conducted on an annual basis by an independent team to assess the scope, status, implementation, and effectiveness, and to assure compliance with NRC licensing commitments. ***The SVP & CNO has delegated the responsibility for the management review to the VP-NORA.***

Actions considered by the Management Quality Assurance Review may include, but are not limited to:

- a. Review of selected procedures and documents;
- b. Verification of the implementation of selected procedural requirements;

- c. Review of past audit results and other inspection/review results such as those from previous Management Quality Assurance Reviews, the NRC or other departments.

The Management Quality Assurance Review's findings of deficiencies and recommendations for program improvement are forwarded to the SVP & CNO who shall assure appropriate corrective action is taken.