

50-245

DATE: 06/19/00

TRANSMITTAL# QA1-00-221

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Q004

MRR-102

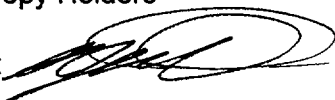


Northeast
Utilities System

50-245
Memo

DECOMM-00-221
June 15, 2000

To: Millstone Unit 1 Northeast Utilities Quality Assurance Program Topical Report
Controlled Copy Holders

From: Steve Strout 
x 0568

Subject: Distribution of Millstone Unit 1 Northeast Utilities Quality Assurance Program
Topical Report Revision 0, Change 4.

Enclosed is Millstone Unit 1 Northeast Utilities Quality Assurance Program (M1 NUQAP) Topical Report Revision 0, Change 4. This change was approved as LBDCCR M1-00-023 and revises Appendix E by taking exception to ANSI N18.7-1976, Section 5.2.15, Review, Approval and Control of Procedures with regard to the biennial review of procedures. The effective date of the change is June 8, 2000.

Changes are in ***bold and italics*** with a revision bar in the right margin.

Change Instructions:

Remove:

Cover Sheet dated 01/01/2000
Appendix E, 3 pages

Insert:

Cover Sheet dated 06/22/2000
Appendix E, 4 pages
Summary of Changes to MP1
QAP Rev. 0 Incorporated as
Change 04

This change becomes effective on **June 22, 2000** and must be inserted into the manual on that date.

Please complete and return the attached Nuclear Document Services coversheet/transmittal form to NDS acknowledging that you have received and inserted your copy of the subject change.

Enclosures

1. Cover Sheet dated 06/22/00
2. Appendix E dated 06/22/00
3. Summary of changes incorporated as part of Revision 0, Change 4.

cc: R. B. Lundin
Nuclear Records
File

MILLSTONE UNIT 1

**NORTHEAST UTILITIES QUALITY
ASSURANCE PROGRAM**

Rev. 0 Change 4
6/22/2000

APPENDIX E

MILLSTONE UNIT 1 QUALITY ASSURANCE PROGRAM

PROGRAM EXCEPTIONS

1. ANSI N45.2.9, states in part, "structure, doors, frames, and hardware should be Class A fire-related with a recommended four-hour minimum rating." The three record storage vaults at NNECO have a two-hour rating.

NNECO's vaults are used for storage of documentation that is unsuitable for filming or awaiting filming.

A records organization exists along with written procedures addressing the control of quality assurance records.

2. ANSI N18.7-1976, paragraph 4.3.2.3 "Quorum" states in part: "A quorum for formal meetings of the (Independent Review) Committee held under the provisions of 4.3.2.2 shall consist of not less than a majority of the principals, or duly appointed alternates..."

A quorum of the Nuclear Safety Assessment Board shall consist of the Chairman or Vice Chairman and at least enough members to constitute a majority of the assigned members. No more than a minority of the quorum shall have line responsibility for operation of one of Northeast Utilities' nuclear units. No more than two alternates shall be appointed voting status at any meeting in fulfillment of the quorum requirements.

3. ANSI N45.2.9-1974, paragraph 1.4, definition of "Quality Assurance Records" states in part: "For the purposes of this standard, a document is considered a quality assurance record when the document has been completed."

Northeast Utilities has developed the following alternative definition to provide guidance during the interim period from the time a document is completed until it is transmitted to the Nuclear Document Services Facility:

"A record is considered a working document until it is transmitted to the Nuclear Document Services Facility (NDSF) at which time it is designated as a Quality Assurance Record. The following maximum time limits are established for the transmittal of working documents to the NDSF:

Operations Documents - Documentation generated during plant operations may be maintained, as needed, by operating plant departments, for up to one year.

New Construction or Betterment Documents - Documents which evolve during new construction or betterment projects shall be transmitted to NDSF within 90 days of completion of a new construction project or turnover of a betterment project or plant operations.

Procurement Documents - Inspection/Surveillance/Audit Reports generated during vendor oversight activities which are used to maintain vendor status for current and future procurements may be maintained, as needed, by Nuclear Materials and Document Management for up to three years.

All Other Working Documents - All other working documents shall be transmitted to NDSF within 6 months of their receipt or completion."

The requirements of ANSI N45.2.9-1974 do not apply to these "working documents" based on paragraph 1.1 of the ANSI standard which states:

"It (ANSI N45.2.9) is not intended to cover the preparation of the records nor to include working documents not yet designated as Quality Assurance Records."

4. Regulatory Guide 1.64 - 6/76, the Regulatory position states, in part, "It should not be construed that such verification constitutes the required independent design verification." Northeast Utilities has developed the following alternative to allow for adequate independent design verification:

This review may be performed by the originator's Supervisor, only if the Supervisor:

Did not specify a singular design approach;

Did not establish the design inputs or did not rule out certain Design considerations;

Is the only individual in the organization competent to perform the review.

Where the Supervisor performs the design review, the next level of management shall fulfill the Supervisor's responsibilities.

5. ANSI N45.2.13 - 1976, paragraph 10.3.4, states in part, "Post-Installation Test requirements and acceptance documentation (should) shall be mutually established by the purchaser and supplier." Involvement by the supplier in establishing Post-Installation Test requirements and acceptance documentation is requested only when it is deemed necessary and proper by the responsible engineering organization.

Northeast Utilities no longer has any nuclear plants under construction. As a result, most procurements are made for spare parts from suppliers who are not the original equipment manufacturer. In these cases, the supplier may have little or no understanding or knowledge of either the operation of the system the component is to be installed in, or applicable Post-Installation Test requirements and acceptance documentation. As such, Northeast Utilities assumes responsibility for establishing Post Installation Test requirements and acceptance documentation.

6. ANSI N45.2.2-1972, paragraph 1.2, states in part that, "The requirements of this standard apply to the work of any individual or organization that participates in the packaging,

shipping, receiving, storage, and handling of items to be incorporated into nuclear power plants."

Since a portion of Northeast Utilities procurement activities involve commercial suppliers which do not fully comply with the requirements of ANSI N45.2.2, the Northeast Nuclear Energy Company Nuclear Materials and Document Management organization verifies through source inspections, receipt inspection, and/or survey activities that the quality of the materials, items, components or equipment is preserved by those suppliers to the extent that packaging, shipping, storage and handling methods are employed which are commensurate with the nature of the product.

7. Deleted (not applicable to Millstone Unit 1)

8. Deleted (not applicable to Millstone Unit 1)

9. Regulatory Guide 1.33 - 2/78, regarding audits, states in part:

(a) "The results of actions taken to correct deficiencies...at least once per 6 months."

(b) "...technical specifications and applicable license conditions - at least once per 12 months."

(c) "The performance, training, and qualifications of the facility staff - at least once per 12 months."

NU has developed an alternative which modifies these Audit frequencies to at least once per 24 months. This alternative has previously been accepted by the NRC via license amendments 79, 184, and 104 for MP1, MP2, and MP3, respectively.

10. Deleted

11. Deleted (not applicable to Millstone Unit 1)

12. Deleted.

13. Deleted (not applicable to Millstone Unit 1)

14. ***ANSI N18.7-1976, Paragraph 5.2.15, "Review, Approval, and Control of Procedures," states in part: "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."***

NU implements administrative and programmatic controls that ensure procedures are maintained current in accordance with 10CFR50, Appendix B, thus meeting the intent of the biennial review.

NU implements administrative controls to perform biennial reviews of non-routine procedures such as ONPs, E-Plan, Security and other procedures that may be dictated by an event.

Programmatic controls specify conditions when the mandatory review of plant procedures apply, and include a requirement to review applicable procedures following an accident or transient and following any modification to a system.

NU utilizes a pre-job briefing practice to ensure that personnel are aware of what is to be accomplished and what procedures will be used prior to beginning a job. In addition, the Procedure Compliance Policy requires that the job be stopped and the procedure be revised or the situation resolved prior to work continuing if procedures cannot be implemented as written.

Additionally, NU Quality Assurance Program requires the review of a representative sample of plant procedures as part of routine audits and surveillances to ensure that existing administrative controls for procedure verification, review and revision are effective in maintaining the quality of plant procedures. Significant procedural deficiencies are identified and corrected through the Station Corrective Action Program. The Station Self-Assessment Program also periodically reviews selected procedures and identifies deficiencies and improvements through the Corrective Action Program.

Summary of Changes to MP1 QAP Rev. 0 Incorporated as Change 04

<u>Section</u>	<u>Summary Description of Changes</u>	<u>Reference</u>
Appendix E	Add exception # 14, which takes exception to ANSI N18.7-1976, section 5.2.15, "Review, Approval and Control of Procedures" with regard to the biennial review of procedures.	LBDCR M1-00-023