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	Item	Facility	Type	Sub	Document Number / Title	Sheet	Revision	Doc Date	Copy #	Media	Copies
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Northeast
Utilities System

Memo

NO-00-0332
October 16, 2000

TO: Northeast Utilities Quality Assurance Program Topical Report Controlled Copyholders

FROM: D. S. Bruce

SUBJECT: NUQAP Topical Report Revision 22, Change 1
(Document No. MP-02-OST-BAP01)

Enclosed is Northeast Utilities Quality Assurance Program (NUQAP) Revision 22, Change 1, which modifies the quality assurance program topical report to reflect the transition to a process based organization. The change includes replacing the titles of "Director" and "Manager" with "Master Process Owner" and "Process Owner", as well as redistribution of responsibilities based on processes instead of functions. The majority of the changes are in QAP 1, "Organization", however the changes in titles and organizational structure impact other sections throughout the NUQAP.

Please replace the entire contents of the existing Quality Assurance Program sections QAP 1, QAP 2, QAP 3, QAP 4, QAP 5, QAP 6, QAP 7, QAP 8, QAP 9, QAP 10, QAP 11, QAP 12, QAP 14, QAP 15, QAP 16, QAP 17, QAP 18 and Appendices B, F, and G, with the enclosed sections. Also, please replace the Table of Contents, Policy Statement and Introduction.

Change 1 changes are in ***bold and italics*** with a revision bar in the right margin. The footer of the affected section includes a reference to Change 1.

Please insert the summary of changes document in the front of your manual. Please note the effective date of the change is **October 17, 2000**.

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

Attachments:

1. Summary of changes incorporated as part of Revision 22, Change 1.

Enclosure:

Change 1 to the Northeast Utilities Quality Assurance Program Topical Report Revision 22.

/dsb

Summary of Changes to NUQAP Rev. 22 Incorporated as Change 1

Section	Summary Description of Changes	Reference
Table of Contents	Appendices - B - changed to "Qualification and Experience Requirements, Process Owner - Oversight"	Request 00-12
Policy Statement	"Director - Nuclear Oversight" changed to "Process Owner - Oversight"	Request 00-12
Introduction	"Director - Nuclear Oversight" changed to "Process Owner - Oversight"	Request 00-12
QAP 1.0	Vice President (VP) - Nuclear Operations, now Vice President (VP) - Generation - Title change only under new process Vice President (VP) - Nuclear Operations - responsible for Station Director, Maintenance, now Vice President (VP) - Generation - responsible for Operate the Asset (which includes Master Process Owner - Operate the Asset, previously Station Director and Unit Operations), Maintain the Asset (previously Maintenance), Support Services and Training VP - Nuclear Technical Services - responsible for Design Engineering, Nuclear Engineering and Plant Engineering, now VP - Nuclear Technical Services - responsible for Manage the Asset (which includes Design, Nuclear, and Plant Engineering), Assessment, Procure the Asset VP - Nuclear Work Services - responsible for Site Services, Nuclear Materials and Document Management, and Unit 1 General Manager, now VP - Nuclear Work Services - responsible for Unit 1 General Manager VP - Human Services - Nuclear responsible for Nuclear Training Services and Emergency Planning, Nuclear Training Services renamed Training, and reports to VP-Generation. Now, Emergency Planning reports to Assessment (under VP- Nuclear Technical Services.) VP - Human Services - Nuclear no longer has Licensing Basis(LB) responsibilities therefore is not required to be defined in the NUQAP. Director-NORA, Regulatory Affairs has been moved under Assessment/Nuclear Technical Services. Oversight responsibilities have been incorporated in responsibilities of Process Owner - Oversight. Director-Nuclear Oversight, Replaced by Process Owner - Oversight. Responsibilities were transferred and reporting relationship left intact.	Request 00-12

Summary of Changes to NUQAP Rev. 22 Incorporated as Change 1

Section	Summary Description of Changes	Reference
	Station Director. Responsible for operations, nuclear safety, chemistry and radiation protection activities. Reports were Assistant Station Director-Safety, Unit Operations an Radiation Protection and Radwaste Services, The Station Director becomes the Master Process Owner - Operate the Asset. Assumes the responsibility for the Shift Technical Advisors previously reporting to his assistant. The assistant director position is eliminated. Radiation Protection and Radwaste Services becomes "Radiological Protection", reporting to Support Service. Unit Operations, Chemistry and Operations support report this position. Maintenance becomes "Maintain the Asset" without change in description. Deputy Process Master Owner statement was added to ensure proper coverage, although it is not considered an LB position. Design Engineering - All responsibilities were incorporated into 1.3.12 "Manage the Asset." Nuclear Engineering -All responsibilities were incorporated into 1.3.12 "Manage the Asset." Plant Engineering -All responsibilities were incorporated into 1.3.12 "Manage the Asset." Site Services - responsible for services in support of the station, including security and fire protection. Now Support Services (1.3.9) is now responsible for services in support of the station, including security and fire protection. In addition, Support Services is responsible for Radiological services and Radiological waste services (previously under Station Director); procedures (previously under Assistant Station Director.); and nuclear records management, previously under Nuclear Materials and Document Management. Nuclear Materials and Document Management. Now Responsibilities of Nuclear Materials and Document Management are now covered by "Procure the Asset", except for nuclear records management - moved to Support Services as described above. Nuclear Training Services Now "Training Services" and reports to VP- Generation. Director title changed to "Master Process Owner." Emergency Planning keeps the same roles and responsibilities but now reports to Assessment. Assistant Station Director - Safety - responsible for corrective actions program, procedures, and the shift technical advisors Position was not licensing basis per standards, and has been eliminated.	

Summary of Changes to NUQAP Rev. 22 Incorporated as Change 1

Section	Summary Description of Changes	Reference
	The corrective action program was assigned to Performance Improvement/Assessment. The shift technical advisors were assigned to Operate the Asset (Master Process Owner - previously Station Director). Procedures have become the responsibility of Support Services. Unit Operations maintains the same general structure. Operations Manager become "Process Owner - Operations" and reports to Master Process Owner - Operate the Asset (which was previously Station Director, who Unit Operations reported to in the past.) Figures 1.0 through 1.3 were modified to reflect new organization. (Note : Directors becomes "Master Process Owners" and Managers becomes "Process Owners"	
QAP 2.0	"Director(s)" becomes "Master Process Owner(s)" "Nuclear Materials and Document Management" becomes "Procure the Asset". "Director - Nuclear Oversight" changed to "Process Owner - Oversight"	Request 00-12
QAP 3.0	"Nuclear Technical Services" becomes "Manage the Asset".	Request 00-12
QAP 4.0	"Nuclear Materials and Document Management" becomes "Procure the Asset".	Request 00-12
QAP 5.0	"Director(s)" becomes "Master Process Owner(s)" "Nuclear Oversight" becomes "Oversight"	Request 00-12
QAP 6.0	"Station Nuclear Document Services" becomes "Procedures and Document Services" "Nuclear Oversight" becomes "Oversight"	Request 00-12
QAP 7.0	"Nuclear Materials and Document Management" becomes "Procure the Asset". Maintenance becomes "Maintain the Asset"; "Site Services" becomes "Support Services", Engineering becomes "Manage the Asset", "operations" becomes "Operate the Asset" "Nuclear Oversight" becomes "Oversight"	Request 00-12
QAP 8.0	"Nuclear Materials and Document Management" becomes "Procure the Asset".	Request 00-12
QAP 9.0	"Nuclear Materials and Document Management" becomes "Procure the Asset". "Nuclear Oversight Department" becomes "Oversight"	Request 00-12
QAP 10.0	"Nuclear Materials and Document Management" becomes "Procure the Asset". "Nuclear Oversight Department" and "Nuclear Oversight" become "Oversight"	Request 00-12
QAP 11.0	"Nuclear Materials and Document Management" becomes "Procure the Asset". "Nuclear Oversight" become "Oversight"	Request 00-12

Summary of Changes to NUQAP Rev. 22 Incorporated as Change 1

Section	Summary Description of Changes	Reference
QAP 12.0	"Nuclear Materials and Document Management" becomes "Procure the Asset". "Nuclear Oversight Department" and "Nuclear Oversight" become "Oversight"	Request 00-12
QAP 14.0	"Nuclear Materials and Document Management" becomes "Procure the Asset". "Nuclear Oversight Department" and "Nuclear Oversight" become "Oversight" "Reactor Engineering and Nuclear Engineering" becomes "Nuclear Fuels and Safety Analysis"	Request 00-12
QAP 15.0	"Nuclear Materials and Document Management" becomes "Procure the Asset". "Nuclear Oversight Department" and "Nuclear Oversight" become "Oversight"	Request 00-12
QAP 16.0	"Nuclear Oversight Department" becomes "Oversight"	Request 00-12
QAP 17.0	"Nuclear Document Services" becomes "Procedures and Document Services"	Request 00-12
QAP 18.0	"Nuclear Materials and Document Management" becomes "Procure the Asset". "Nuclear Oversight Department" and "Nuclear Oversight" become "Oversight"	Request 00-12
Appendix B	"Director - Nuclear Oversight" changed to "Process Owner - Oversight" Table B-1 modified to reflect appropriate process based positions ("Station Director" becomes "Master Process Owner - Operate the Asset", "Manager Chemistry" becomes "Process Owner - Chemistry", "Manager Radiation Protection and Waste Services" becomes "Process Owner - Radiological Services", "Operations Manager" becomes "Process Owner - Operations", "Manager I&C Maintenance" becomes "Process Owner - Plant Reliability 3", "Director - Maintenance" becomes "Master Process Owner - Maintain the Asset and Deputy Master Process Owner - Maintain the Asset", "Manager - Unit System Engineering, Manager - Plant Support Engineering, and Manager - Common System Engineering" replaced with "Process Owner(s)" - "Asset Production". "Configuration Control", "Asset Strategy", "Nuclear Fuel", "Technical", "Maintenance Support Services", "Supervisor, Reactor Engineering" becomes "Team Lead - Reactor Engineering")	Request 00-12
Appendix F	"Director - Nuclear Oversight" changed to "Process Owner - Oversight" "Station Director" becomes "Master Process Owner - Operate the Asset", "Director" and "Manager" titles changed to "Master Process Owner" and "Process Owner" "Director - Nuclear Oversight" changed to "Process Owner - Oversight" SORC membership redefined based on new organization and closer to PORC method	Request 00-12
Appendix G	Technical Specification cross references updated to current organizational positions	Request 00-12

TABLE OF CONTENTS

NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP) TOPICAL REPORT - MILLSTONE POWER STATION

POLICY STATEMENT
NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP)
TOPICAL REPORT - MILLSTONE POWER STATION

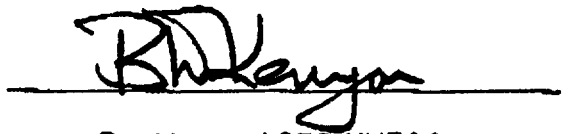
This Northeast Utilities Quality Assurance Program (NUQAP) Topical Report has been developed to achieve quality assurance in all activities affecting the safe operation of Millstone Units 2 and 3. The policies, requirements and tasks contained in this program description have been developed to achieve quality assurance during activities that apply to the design, fabrication, procurement, construction, testing, operation, refueling, maintenance, repair, and modification of Millstone Units 2 and 3.

Northeast Utilities procedures which implement this program are described in various manuals.

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 as Category I. This NUQAP is also applicable 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 program manuals and procedures. Quality Assurance provisions for primary chemistry laboratory activities are detailed in the Northeast Utilities Nuclear Chemistry Laboratory Quality Assurance Manual. Quality Assurance provisions for Millstone Unit 1 are governed by a separate program.

The development and overall responsibility for this program lies with the President and CEO-NNECO, as delegated by the Chairman, President Chief Executive Officer of Northeast Utilities. Corporate authority is delegated to the ***Process Owner*** - Oversight for the preparation and administration of this NUQAP Topical Report. Individual Vice Presidents are responsible for the implementation of their portion of this program. Audits of this program are the responsibility of the ***Process Owner*** - Oversight.

Any revisions or additions shall be approved by affected departments prior to the incorporation of such changes into the program. Final approval of revisions or additions to this Policy Statement rests with the President and CEO-NNECO.



President and CEO-NNECO

INTRODUCTION
NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP)
TOPICAL REPORT - MILLSTONE POWER STATION

This Northeast Utilities Quality Assurance Program (NUQAP) Topical Report contains the quality assurance requirements which are relevant to the safety of Millstone Station Units 2 and 3. This NUQAP Topical Report consists of three parts:

1. Introduction, which defines the purpose of the Topical Program and summarizes its scope and applicability;

2. The NUQAP, which is applicable in its entirety to all activities affecting the safety-related functions of structures, systems, and components in 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 as Category I. This NUQAP is applicable 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 program manuals and procedures.

3. Appendices, which provide supporting statements and tabulations.

This NUQAP Topical Report has been prepared to document that a quality assurance program has been established and implemented to assure that adequate quality requirements are being complied with to safeguard NU employees, contracted personnel and the public during the life of the operating Millstone Station nuclear power plants. Quality Assurance provisions for Millstone Unit 1 are governed by a separate program. In addition, there are other programs to safeguard NU employees, contracted personnel, and the public.

The controls which implement the actions identified in this NUQAP are procedures and instructions which delineate actions and steps necessary to accomplish quality requirements. Procedures and instructions are written by groups, divisions, departments, branches, or sections which have the responsibility for implementing actions as assigned by this NUQAP. Quality procedures and revisions thereto are reviewed by and concurred with by Oversight in accordance with QAP 2.0, "Quality Assurance Program" and QAP 5.0, "Procedures, Instructions, and Drawings".

This NUQAP is responsive to applicable codes, Nuclear Regulatory Commission regulatory requirements, accepted industrial standards and revisions thereto. Provisions are established to update this NUQAP Topical Report in accordance with revisions to codes, standards and regulatory requirements, and to inform cognizant personnel to implement appropriate action to assure the highest standard of quality is achieved for structures, systems, components, and services for the Millstone Station nuclear power plants.

Process Owner - Oversight

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 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. For quality software, the Software Quality Assurance (SQA) Program provides instructions to classify software and describe the appropriate level of documentation that is warranted for software used to support those functions of structures, systems, and components that are affected by the NUQAP.

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 **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. Oversight 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 ***Master Process Owner*** 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.

Oversight 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.

Oversight is responsible for: a) the development, coordination, and administrative control of this NUQAP including coordination of Oversight 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. ***Procure the Asset*** 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, ***Procure the Asset*** 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. ***Procure the Asset*** 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 ***Master Process Owners*** are responsible for implementing this NUQAP within their organization. The ***Process Owner*** - **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 ***Process Owner*** - Oversight.

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.

3.0 DESIGN CONTROL

3.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure that the applicable design requirements, such as design bases, regulatory requirements, codes, technical standards and quality standards, are identified in design documents which are reviewed, approved and controlled in accordance with procedures. Such measures include review for suitability of application of materials, equipment, parts and processes that are essential to the functions of quality structures, systems, and components. Changes to, and deviations from specified requirements are identified, documented and controlled.

Manage the Asset is responsible for controlling design work, administering design control activities (including design interface) and design modifications for quality structures, systems, and components.

The responsibility for administration of the design control program for the Millstone Station nuclear power plants rests with ***Manage the Asset***. The division of responsibilities and jurisdictional boundaries for design control program implementation are set forth in NUSCO/NNECO procedures. Although other organizations may be delegated the task of establishing and executing the design control program or any part thereof, ***Manage the Asset*** shall retain overall responsibility for the program. The applicable requirements of this NUQAP shall be imposed on other organizations delegated the task of establishing or executing the design control program in accordance with QAP 4.0, "Procurement Document Control" and QAP 7.0, "Control of Purchased Material, Equipment and Services".

The interface controls, both internal and external, for organizations performing design work for quality structures, systems, and components are identified and implemented in accordance with procedures. This identification includes those organizations providing criteria, designs, specifications and technical direction.

Measures are applied to verify the adequacy of design. The extent of design verification is specified and documented by the responsible organization. The individuals performing design verification should not (1) have immediate supervisory responsibility for the individual performing the design, (2) have specified a singular design approach, (3) have ruled out certain design considerations, or (4) have established the design inputs for the particular design aspect being verified. The independent design verification should not dilute or replace the responsibility of the supervisors for the quality of work performed under their supervision. Where changes to previously verified designs have been made, design verifications are required for the change, including evaluation of the effects of those changes on the overall design. Design verification may be accomplished by testing. Tests to demonstrate adequacy under adverse design conditions shall comply with the requirements of QAP 11.0, "Test Control." Design errors and deficiencies which adversely affect quality structures, systems, and components in the design process are documented and appropriate corrective action is taken. These design errors

and deficiencies are documented in accordance with design change procedures or as defined in QAP 15.0, "Nonconforming Material, Parts, Components, or Services" and/or QAP 16.0, "Corrective Action".

3.2 IMPLEMENTATION

Manage the Asset is responsible for the design, design review, engineering approval of design changes, design evaluation and design control for the units. Although some portion of the design process may be delegated to other organizations, ***Manage the Asset*** has the responsibility for overall design and final engineering decisions and design control of quality structures, systems, and components.

Oversight performs audits, surveillances, and inspections, as appropriate, to verify that NUSCO/NNECO **processes** are effectively complying with this NUQAP and procedural requirements for design control. Additionally, audits, surveillances and inspections are performed, as appropriate, to verify that vendors are effectively complying with their quality assurance program requirements for design control.

3.2.1 DESIGN PROCESS

Design control measures are applied to design analyses, such as, reactor physics, stress, thermal, hydraulic, nuclear radiation, accident and seismic analyses; compatibility of materials; accessibility for in-service inspection, maintenance, and repair; and delineation of acceptance criteria for inspections and test. Measures established to control design documents are described in QAP 6.0, "Document Control".

Program procedures and instructions define the method of implementing design control measures. These measures require that applicable design requirements, such as, design bases, regulatory requirements, codes and standards, are translated into specifications, drawings, procedures or instructions. Procedures and instructions further require that appropriate quality standards are specified and included in design documents. Materials, equipment, parts and processes, including standard "off the shelf" commercial or previously approved items essential to quality functions are selected and reviewed for suitability of application. The basis for selection may include industry standards, material and prototype hardware testing programs, and design review.

Procedures assure that a documented check is performed to verify the accuracy and completeness of design drawings and specifications before release for procurement, fabrication or construction. Design drawings receive a documented check to verify dimensional accuracy.

Design drawings and specifications issued for design changes are reviewed for completeness and accuracy before release to operations, in accordance with design control procedures.

Procedures describe the provisions to assure that design drawings and specifications are prepared, reviewed and approved in accordance with NUSCO/NNECO requirements and that the documents contain the necessary quality assurance requirements, such as inspections and test requirements, acceptance requirements, and the extent of documenting inspection and test results.

3.2.2 DESIGN CHANGE CONTROL

Procedures and instructions governing design change control during modifications to the Station nuclear plants, the control of discrepant or deficient design conditions, and the reporting of unsatisfactory performance provide for the identification of the need for design changes and a documented method to control these changes. Design and specification changes are subject to design control measures commensurate with those applied during the original design as amended by applicable design or licensing basis changes.

An independent review and approval of design changes is performed by the organization that conducted the original design reviews, unless such review is performed by NNECO or another qualified organization delegated by NNECO to perform this function.

Proposed design change modifications are submitted to the appropriate ***Manage the Asset*** management for processing and review. This review includes the appropriate on-site review committee(s) as required by applicable procedures. If the change involves a quality structure, system or component, the change shall be reviewed by qualified engineering personnel for technical adequacy. Reviews of the safety evaluations associated with proposed design changes are performed by the Nuclear Safety Assessment Board (NSAB). The sequence of the NSAB review depends upon the determination of whether an unreviewed safety question is involved (i.e., in accordance with ANSI N18.7, if a proposed change in the facility involves an unreviewed safety question then the NSAB review is conducted prior to submittal of the proposed change to the NRC for review and the issuance of a license amendment for its implementation).

The combination of these independent reviews by the on-site review committee(s) and NSAB is performed to assure that:

a. the adequacy of the proposed change is substantiated;

b. unreviewed safety questions are properly identified and handled per 10 CFR 50.59;

c. nuclear safety requirements have been addressed.

Errors and deficiencies in design, including the design process, that could adversely affect quality structures, systems, and components are documented and corrective action is taken in accordance with QAP 15.0, "Nonconforming Materials, Parts, Components, or Services" and/or QAP 16.0, "Corrective Action".

Notification of design changes are transmitted to responsible plant personnel prior to implementation and as part of the design change package close out. Procedures describe this notification which assures that personnel are made aware of design change modifications which may affect the performance of their duties.

3.2.3 DESIGN INTERFACE CONTROL

Procedures and instructions identify design interface controls and the resolution of design interface questions during modifications to the station nuclear power plants.

3.2.4 INDEPENDENT DESIGN VERIFICATION

Original designs and design modifications are reviewed for adequacy and the sign-off performed by a person other than the originator of the design. The originator's supervisor may perform this independent review only if the supervisor: (1) did not specify a singular design approach, (2) did not establish the design inputs or rule out certain design considerations, (3) 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. Design verification is documented in accordance with procedures or instructions. Simplified calculations or computer programs may be utilized as alternate means of design verification. When design verification is performed by testing, the tests are performed using procedures, which specify the authority and responsibility of design verification personnel. Responsibility for design adequacy and evaluation is retained by ***Manage the Asset.***

Design verification (if other than by qualification testing) is normally completed prior to release for procurement, fabrication, and construction, or release to another organization for use in other design activities. For those cases where design verification cannot be completed prior to release for procurement, fabrication, and construction, procedures assure that design verification is completed prior to the point when the installation is declared operational.

Procedures describe the requirements which assure the following when testing is considered as an alternate method of design verification:

a. Specifications or procedures provide criteria that specify when verification should be by test.

b. Prototype, component or feature testing is performed as early as possible prior to installation of plant equipment, or prior to the point when the installation is declared operational.

c. Verification by test performed under conditions that simulate the most adverse conditions as determined by analysis.

Particular emphasis is placed on assuring that designs are in conformance with applicable codes, and on selecting the proper design verification or checking method. Procedures and instructions provide the requirements and necessary controls for design verification. These controls include a review to assure that design characteristics can be controlled, verification that there is adequate accessibility for inspection or test, and that inspection and test acceptance criteria are incorporated. Documentation of reviews is provided.

Procedures include requirements which identify the responsibility of design verifiers, the areas and features to be verified, and the extent of the documentation.

Procedures assure that procedural control is established for design documents that reflect the commitments of the nuclear unit FSAR. These procedural controls vary for design documents which receive formal design verification by several disciplines or organizations, and those which can be reviewed by a single individual. The specific design documents and specialized reviews are determined and used as required by the design changes and modifications.

Procedures are established to assure that verified computer programs are certified for a specific use.

NNECO is responsible for assuring that the design documents generated by vendors for the Station nuclear power plants are technically correct, approved, and maintained.

4.0 PROCUREMENT DOCUMENT CONTROL

4.1 GENERAL REQUIREMENTS

This NUQAP provides measures to control the procurement of materials, equipment, parts and services for quality structures, systems, and components for the Millstone Station nuclear power plants to assure compliance with applicable regulatory requirements, procedures, quality assurance standards, and regulations affecting procurement documents. Changes to procurement documents are subject to the same degree of control as utilized in the preparation of the original documents.

4.2 IMPLEMENTATION

4.2.1 PROGRAM

A responsible engineer is selected for each modification to a Station nuclear power plant. The responsible engineer coordinates the preparation, review and approval of procurement documents for quality materials, equipment, parts and services, and assures the technical adequacy and inclusion of quality assurance requirements.

Requests for materials, equipment, parts and services are reviewed for technical adequacy and verification of the quality designation. The appropriate responsible engineer/nuclear unit management reviews and approves such requests in accordance with applicable procedures. ***Procure the Asset*** personnel then perform a procurement engineering evaluation to assure the inclusion and adequacy of quality assurance requirements prior to the issuance of the purchase order. Materials, equipment, and parts for which technical and quality assurance requirements have been previously established within the Material Information Management System ***(MIMS)*** are purchased without additional procurement engineering evaluations.

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible to implement measures for control of associated procurement documents to assure applicable requirements including quality assurance requirements are specified.

Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for the control of procurement documents.

Changes to procurement documents, whether initiated by NNECO or its representative, are subjected to the same degree

of control as that utilized in the preparation of the original document. The procurement of spare or replacement parts for quality structures, systems, or components is subject to the controls of this NUQAP and applicable procedure requirements. The spare or replacement parts are subject to controls equivalent to original or subsequent codes and standards. The use of subsequent codes and standards are controlled in accordance with QAP 3.0, "Design Control".

Procurement engineering evaluations of requests for quality materials, equipment, parts, and services requests are performed by ***Procure the Asset*** personnel to assure that:

a. Adequate technical requirements are specified;

b. The quality assurance requirements are correctly stated, auditable and controllable;

c. There are adequate acceptance and rejection criteria.

4.2.2 PROCUREMENT DOCUMENT PROVISIONS

Procurement documents are prepared, reviewed and approved in accordance with applicable procedures of the issuing organization or department and are available for verification. These procedures require that procurement documents consist of the following, as necessary:

a. The scope of work to be performed;

b. Technical requirements (specified or referenced) including the applicable components and materials Identification requirements, drawings, specifications, procedures, instructions, codes and regulations, and the identification of applicable test, inspection and acceptance requirements, or special process instructions;

c. Quality assurance program requirements to be imposed on vendors which include the applicable requirements of 10 CFR 50, Appendix B, and the NRC regulatory position contained in the regulatory guides and their endorsed ANSI/IEEE standards listed in Appendix C.

d. Right of access which provides, as appropriate, for access to vendor facilities and records for inspection or audit by NNECO or its designated representative; and provides access for events such as those requiring notification of hold points;

e. The documentation required to be prepared, maintained, and/or submitted to NNECO or its representative for review, approval or historical record. The time of submittal of this documentation and the retention and disposition of quality assurance records which are not submitted to NNECO is prescribed, as applicable, for nuclear grade procurements.

4.2.3 SELECTION OF PROCUREMENT SOURCES

The vendor is specified during the procurement process based upon the vendor approval status, qualifications and capabilities to provide the product or service, performance history, and NNECO's ability to verify the quality of the product or service being purchased. NNECO maintains an approved vendors list based upon the technical and quality capability as determined by a direct evaluation of the vendor's facilities and personnel and the implementation of the vendor's quality assurance program.

Procurement documents may be issued to vendors with unapproved quality assurance programs. These procurement documents to unapproved vendor contain detailed supplementary quality assurance requirements and/or witness/hold points to meet NNECO requirements.

Procurement documents are reviewed by ***Procure the Asset*** to assure appropriate quality assurance requirements are specified. The requirements include, as necessary, audits, surveillances, or inspections at the vendor's facilities with scheduled witness/hold points during the fabrication process and/or prior to shipment of the procured items. Acceptance inspections and tests determined by NNECO shall be performed after receipt at Millstone Power Station but prior to installation in the plant or prior to the point when the installation is declared operational.

5.0 PROCEDURES, INSTRUCTIONS AND DRAWINGS

5.1 GENERAL REQUIREMENTS

This NUQAP provides measures for the preparation, review, approval, control and distribution of procedures, instructions and drawings for activities affecting quality structures, systems, and components of the Millstone Station nuclear power plants. The documents include appropriate quantitative and qualitative acceptance criteria which specify the activity to be performed, the methods of fabrication, construction, and testing to be employed; the materials, equipment or parts to be used; a sequence of operation, and the required documentation.

5.2 IMPLEMENTATION

Quality procedures provide direction for personnel performing quality activities. **Oversight** reviews and concurs with other quality procedures which implement this NUQAP as described in Section 5.2.1 below. Comments concerning compliance with this NUQAP and regulatory requirements are resolved prior to issuance of the procedure. Any vendors utilized to perform quality activities for the Station nuclear power plants may be delegated responsibility for preparing, maintaining, issuing and verifying the implementation of appropriate program documents which are selectively reviewed/approved by the appropriate ***Master Process Owner*** or Responsible Engineer. Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for compliance with procedures and instructions. Vendor quality assurance programs are required to clearly delineate the actions to be accomplished in the preparation, review and control of procedures, instructions and drawings and the methods for complying with 10 CFR 50, Appendix B.

5.2.1 PROCEDURES AND INSTRUCTIONS

Procedures and instructions for activities affecting quality are prepared, reviewed, and approved in accordance with written procedures and instructions.

The cognizant ***Master Process Owner*** or responsible engineer assures that any vendors utilized to perform quality activities for the Station nuclear power plants implement quality assurance programs which contain written instructions for preparation, review and approval of procedures and instructions affecting quality. In addition, vendor quality procedures and quality control inspection procedures which are to be used for onsite activities are reviewed for concurrence by **Oversight** to assure compliance with the Northeast Utilities Quality Assurance Program (this NUQAP).

NNECO is responsible for the preparation, review and approval of station and plant quality procedures. The procedures include test

procedures and overall site administrative procedures which implement the requirements of this NUQAP. Each NUSCO/NNECO organization is also responsible for the preparation, review and approval of procedures covering quality activities in accordance with individual license requirements. **Oversight** reviews and concurs with quality procedures and special process procedures. The criteria for documents requiring **Oversight** review and concurrence and their identification are defined in quality procedures to assure:

a. Administrative procedures and manuals comply with this NUQAP and applicable Appendix C regulatory guides and endorsed ANSI/IEEE standards.

b. Work procedures and work documents used to perform quality activities have the necessary quality assurance controls as described in QAP 10.0, "Inspection".

5.2.2 DRAWINGS

The design control and verification measures described in QAP 3.0, "Design Control", are applicable for the review and approval of drawings. Review and approval of new drawings or modifications to existing drawings are described in NUSCO/NNECO procedures. The originating organization may delegate to other organizations or departments the work of design and review activities, or any part thereof, but retains responsibility for this work.

The measures taken to assure the preparation of as-built drawings and related documentation in a timely manner to accurately reflect the actual plant are described in NUSCO/NNECO procedures. Drawings critical to operation are updated prior to system turnover to operation and are available to the operating personnel.

5.2.3 ACCEPTANCE CRITERIA

Cognizant department heads review and approve departmental procedures, instructions and drawings to assure the inclusion of adequate quantitative and qualitative acceptance criteria, as appropriate, for determining satisfactory work performance and quality compliance for applicable quality activities.

6.0 DOCUMENT CONTROL

6.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure controlled distribution of documents pertinent to quality activities performed for the Millstone Station nuclear power plants in accordance with quality procedures.

Documents such as procedures, instructions, drawings, specifications and reports are prepared, reviewed for appropriate qualitative and quantitative acceptance criteria, and approved by authorized personnel in the affected organization. Approved controlled documents are distributed to affected locations in accordance with controlled distribution lists. Changes to controlled documents are reviewed and approved by the same organization which performed the original review and approval, unless otherwise specified in the applicable procedures. Measures are provided for controlling documents to preclude the possibility of use of outdated documents.

6.2 IMPLEMENTATION

6.2.1 RESPONSIBILITY

NUSCO/NNECO procedures and instructions delineate the measures for controlling documents including direction for the review for adequacy, approval by authorized personnel, distribution of controlled documents and verification that changes are promptly incorporated and implemented. These control measures apply to documents affecting quality structures, systems and components during the performance of quality activities for the Station nuclear power plants and include documents such as:

a. Design Specifications;

b. Design, Manufacturing, Construction and Installation Drawings;

c. As-Built Documents;

d. Quality Assurance Program Manuals, Procedures and Instructions;

e. Manufacturing, Inspection and Testing Instructions;

f. Test Procedures;

g. Calculations;

h. Engineering Record Correspondence;

i. Design Basis Documentation Summaries (DBDS)

j. Final Safety Analysis Reports;

k. Procurement Documents;

l. Design Change Records;

m. Topical Report;

n. Nonconformance Reports;

o. Computer Codes.

NUSCO/NNECO procedures describe the measures taken by **Oversight** or individuals other than the person who generated the document but qualified in quality assurance for the control of documents to assure review and concurrence, as necessary, for such documents listed above with regards to quality assurance aspects.

The requirements for control of procurement documents are contained in QAP 4.0, "Procurement Document Control". It is the responsibility of each organization issuing controlled documents to employ document control procedures. The issuing organization is additionally responsible for distribution of the documents to appropriate locations. There shall be provisions to assure that approved changes are included in instructions, procedures, drawings and other documents prior to implementation of the changes.

Any vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing measures for review, approval, control and distribution of controlled documents to assure they are effectively complying with the requirements for document control. Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for document control.

6.2.2 DISTRIBUTION OF CONTROLLED DOCUMENTS

NUSCO/NNECO procedures specify in what manner controlled documents, and revisions thereof, are distributed to appropriate locations prior to commencing the work.

6.2.3 DRAWING CONTROL

Procedures & Document Services is responsible to implement a program, through applicable procedures, for the retention and retrieval of drawings and records submitted by cognizant NUSCO/NNECO personnel. ***Procedures & Document Services*** maintains a drawing

status file which includes drawings newly issued or revised with the latest revision and current status.

Vendors utilized to perform quality activities for the Station nuclear power plants may be delegated the function of drawing control and must furnish periodic status reports listing the revisions of applicable drawings which they issue.

Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for control of drawings.

6.2.4 PROCEDURE AND INSTRUCTION CONTROL

Oversight performs audits, surveillances, and inspections, as appropriate, to verify that NUSCO/NNECO ***processes*** are effectively complying with this NUQAP and procedural requirements, for control of procedures and instructions. Audits, surveillances, and inspections are performed, as appropriate, to verify vendors utilized to perform quality activities are effectively complying with their quality assurance program requirements for control of procedures and instructions.

The originating department is responsible for establishing adequate control over quality procedures and instructions issued by them. The responsible organization also issues status reports or revised indices listing the latest revision of applicable controlled documents issued by them.

7.0 CONTROL OF PURCHASED MATERIAL, EQUIPMENT AND SERVICES

7.1 GENERAL REQUIREMENTS

This NUQAP provides measures for the control of purchased material, equipment, parts and services utilized in quality activities for the Millstone Station nuclear power plants to assure conformance to procurement documents. These measures include provisions for source evaluation and selection, submission of objective evidence by the vendor or subvendors, inspection at the vendor facility, and acceptance inspection and testing of the product upon delivery. Control of quality by vendors and their subvendors is assessed for effectiveness at intervals consistent with the importance, complexity and quantity of the product or service.

7.2 IMPLEMENTATION

The evaluation and selection of vendors is performed in accordance with procedures, which specify that procurement source evaluation and selection measures are performed to determine vendor capability and delineate responsibilities of qualified personnel involved in the evaluation and selection process.

7.2.1 VENDOR QUALIFICATIONS

Procure the Asset utilizes one or more of the following methods in evaluating the qualifications of a potential vendor:

a. Audits performed by **Oversight** and/or ***Procure the Asset*** coordinated review of potential vendor utilizing one or more departments (i.e., ***Manage the Asset, Support Services, Maintain the Asset, Operate the Asset);***

b. Other utility vendor audits and evaluations;

c. Nuclear Procurement Issues Committee (NUPIC) audits;

d. ASME N, NA, NPT, NV, or MM/ MS Certificate of Authorization;

e. ASME Certificate of Accreditation for Authorized Inspection Agencies;

f. Commercial grade surveys and/or coordinated review of a potential vendor utilizing one or more departments, (i.e., engineering, site services, operations, procurement);

g. Source inspection/surveillance.

Evaluations assure that vendors providing quality material, equipment, parts and services employ a quality assurance program that conforms to applicable portions of this NUQAP.

Procure the Asset is responsible for assuring that documented evidence of the evaluation and acceptance of the vendor's quality assurance program is maintained. The determination of vendor approval is based on such factors as prior performance, quality performance data, audits, commercial grade surveys, surveillances and evaluations of the vendor's quality assurance program.

Vendor Certificates of Conformance are periodically evaluated by audits, commercial grade surveys, surveillances, independent inspections and tests, to assure they are valid. This verification of Certificates of Conformance is documented.

7.2.2 SOURCE INSPECTION

Procure the Asset is responsible for the performance of source inspections at vendor facilities to assure that the requirements of a purchase order/contract have been met.

Source inspections are performed in accordance with procedures which provide for the method of inspection, the extent of documentation required and those responsible for implementing those instructions.

Inspection of items occurs either when verifications of procurement requirements cannot be determined upon receipt or the vendor quality assurance program has not been accepted by ***Procure the Asset***.

7.2.3 RECEIPT INSPECTION

Receipt inspection for procured items is performed by ***Procure the Asset*** in accordance with quality procedures which delineate requirements and responsibilities necessary to perform inspection functions. The exception to this is ***Nuclear Fuels and Safety Analysis*** performing receipt inspection for new fuel assemblies in accordance with quality procedures. Contractual obligation fulfillment and specified requirements are verified during receipt inspections.

Receipt inspection of vendor-furnished material, equipment, and parts is performed to assure that these items and acceptance records are examined in accordance with predetermined inspection instructions prior to acceptance, installation and operation. Receipt inspections include, as appropriate:

a. Measures for verifying that the shipment is complete, properly identified, undamaged and corresponds with the required documentation;

b. Measures for inspection of the item's critical characteristics and review of supporting documentation (e.g., mill test reports, NDE reports) as required by the procurement documents;

c. Measures for inspection and acceptance of items in accordance with predetermined methods;

d. Measures for identifying and controlling acceptable items including identification of inspection status prior to release from the receiving inspection area;

e. Measures for identifying, segregating and handling nonconforming items;

f. Measures to ascertain that inspection records or Certificates of Conformance are acceptable prior to release for installation;

g. In cases involving purchased services, the responsible engineer or department head shall designate the means by which services may be accepted, and is given the authority to accept services in accordance with methods defined in NUSCO/NNECO procedures.

7.2.4 VENDOR FURNISHED RECORDS

Records required to be furnished by the vendor are specified in the procurement documents. Certifications or documentation provided by the vendor which attests to conformance, identifies that all the specific procurement requirements have been met (either by reference to the purchase order or by delineation).

The vendor must furnish the following records as a minimum for nuclear grade purchases:

a. Documentation that identifies the purchased material, equipment, or parts and the specific procurement requirements (e.g., codes, standards and specifications) which have been met by the items;

b. Documentation that identifies any procurement requirements which have not been met, together with a description of those Nonconformances dispositioned "accept as is" or "repair."

The responsible ***Procure the Asset*** and/or ***Manage the Asset*** and other appropriate department personnel shall review for acceptability those documents which pertain to the requirements in the procurement document, in accordance with this NUQAP and applicable procedures.

The department that is contracting onsite quality assurance services shall be responsible for the review and acceptability of vendor personnel/equipment certifications prior to the start of work. **Oversight** shall provide oversight of these activities via surveillance, or inspection, as appropriate, to verify compliance with this requirement.

7.2.5 COMMERCIAL DEDICATION

NNECO procedures address the measures taken to assure that for commercial grade items, where specific quality assurance controls for nuclear applications cannot be imposed in a practicable manner, that special dedication requirements are established and implemented.

These measures follow the guidance in Regulatory Guide 1.144, paragraph C. 3. b (1) and Regulatory Guide 1.123 and applicable paragraphs of Section 10 of ANSI N45.2.13.

These measures include appropriate requirements for special categorization and identification within the procurement document, receiving inspection, and additional controls during the installation and testing process to be performed by ***Procure the Asset***, other NUSCO/NNECO ***processes***, or other appropriate groups.

8.0 IDENTIFICATION AND CONTROL OF MATERIALS, PARTS AND COMPONENTS

8.1 GENERAL REQUIREMENTS

This NUQAP provides measures for the identification and control of materials, parts and components, including partially fabricated assemblies utilized in quality activities for the Millstone Power Station. To assure that each item can be traced to associated documentation, the identification of the item is maintained by heat number, lot number, part number, serial number, or other appropriate methods, and is physically marked on the item and/or on records traceable to the item. Documentation associated with materials, parts, and components delineate that these items have been designed, fabricated, manufactured, tested and/or inspected in accordance with the specified requirements. The object of these controls is to prevent the use of incorrect or defective materials, parts and components.

These measures also require NNECO assure that the identification of inspections, tests, and operation status of structures, systems, and components is known to affected organizations.

8.2 IMPLEMENTATION

NNECO procedures establish the responsibilities and requirements for the identification and control of materials, parts and components. The procedures assure that identification and control are maintained throughout fabrication, receipt, handling, storage and installation of items. Provisions include:

a. Requirements for traceability to appropriate documentation such as: purchase orders, contracts, manufacturing documents, drawings, specifications, certifications, inspection and test records, and nonconformance reports;

b. Controls to assure that the correct identification of an item is verified and documented prior to release for fabrication, assembly, shipping or installation;

c. Requirements which assure that the method or location of markings do not affect the function or quality of an item;

d. Establishment of identification requirements in purchase orders, contracts, specifications, drawings, procedures or instructions.

During the performance of quality activities for the Station nuclear power plants, NNECO may delegate any portion of the implementation of the identification and control program to a vendor. If delegated, contracts require that the vendor establish an identification and control program which meets this NUQAP requirements. Audits, surveillances, and inspections are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for identification and control of materials, parts and components.

Receipt inspections are performed to verify that materials, parts and components are properly identified in accordance with procurement requirements. ***Procure the Asset*** is

responsible for assigning and applying necessary identification to the items in accordance with applicable procedures to assure proper identification and traceabiltiy.

In the event that materials, parts or components are nonconforming or the identification becomes lost or illegible, the items are considered nonconforming and are identified and controlled in accordance with QAP 15.0, "Nonconforming Materials, Parts, Components, or Services".

9.0 CONTROL OF SPECIAL PROCESSES

9.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure the control of special processes associated with quality structures, systems, and components of the Millstone Station nuclear power plants by the use of qualified procedures, equipment and personnel.

Special processes are performed under controlled conditions in accordance with special requirements and may include, but are not limited to: welding, cleaning, heat treating, and nondestructive examination and/or testing.

9.2 IMPLEMENTATION

During quality activities performed for the Station's nuclear power plants, the responsible engineer assures that special process data and documentation is reviewed, and that vendor special process procedures utilized for the Station nuclear power plants are qualified and approved, and that personnel and equipment utilizing special processes are properly qualified prior to start of work. Audits, surveillances, and inspections are performed, as appropriate to verify that these vendors are effectively complying with their quality assurance program requirements for control of special processes.

NUSCO/NNECO special process procedures utilized during quality activities for the Station nuclear power plants are prepared, reviewed and approved in accordance with procedures as specified in QAP 5.0, "Procedures, Instructions, and Drawings".

9.2.1 PROCEDURE QUALIFICATION AND CONTROL

NUSCO/NNECO procedures specify that written process control documents are utilized and qualified, as required, in accordance with the applicable specification, codes or standards.

9.2.2 PERSONNEL QUALIFICATION AND CERTIFICATION

Codes, standards and NUSCO/NNECO procedures specify personnel qualification/certification requirements. Personnel responsible for the performance and verification of special processes are trained, tested, and certified as required by applicable specifications, codes and standards. Requirements for the period of certification, examinations, and certification renewal of personnel are also specified. Vendors qualify personnel and maintain records of qualified personnel in accordance with applicable codes, standards, specifications, and vendor purchase order/contract requirements.

The department that is contracting services is responsible for the review of records of qualified personnel, equipment and procedures associated with special processes. ***Procure the Asset*** **or Oversight** shall provide an oversight function via audits, surveillances, or inspections, as appropriate.

Oversight is responsible for assuring the training, testing, and certification of all the Millstone Power Station NU NDE personnel is in accordance with the requirements of Regulatory Guide 1.58 (Rev. 1, 9/80) and ASNT Recommended Practice No. SNT-TC-1A.

9.2.3 SPECIAL PROCESS RECORDS

Records provide objective evidence that special processes were performed in accordance with applicable procedures, by qualified personnel, and that when required by procedures, specifications and codes, such performance was verified. Results of nondestructive examinations are recorded in accordance with applicable specifications, codes and standards. These records are retained by the vendor or supplied to NNECO as required by contract or purchase order. If records are to be retained by the vendor, the contract or purchase order specifies the retention period and instruction for final disposition of records.

Special process documentation such as special process procedures, qualifying data, and personnel and equipment qualification records associated with the performance of special processes at Station nuclear power plants, are kept current and maintained in appropriate NNECO files, with final disposition to the Station Nuclear Document Services Facility.

10.0 INSPECTION

10.1 GENERAL REQUIREMENTS

This NUQAP provides measures to assure that inspections of Millstone Station nuclear power plants quality structures, systems, and components to verify conformance with documented procedures, instructions and drawings are executed in accordance with procedures by qualified personnel independent from the individual or group performing the activity being inspected. If inspection is impossible or disadvantageous, indirect controls by monitoring processing methods, equipment and personnel are provided. Inspection notification and hold points are identified, as required, in the applicable documents.

10.2 IMPLEMENTATION

10.2.1 INSPECTION RESPONSIBILITIES

During the performance of quality activities for the Station nuclear power plants, procedures shall define the need for inspection (e.g., receipt inspection, installation, and product acceptance) to assure quality requirements are met.

Oversight shall perform, as appropriate, audits and surveillances as defined in **Oversight** procedures to verify that procedural requirements are met.

Oversight shall perform inspections of modification and maintenance activities for quality structures, systems, and components. The criteria used to determine when **Oversight** inspection shall be required for these activities and for the preparation of inspection plans shall be identified in **Oversight** procedures. The **Oversight** inspection function includes:

a. Identification of inspection personnel;

b. Review of work procedures and work documents for adequacy of inspection and mandatory hold points;

c. Preparation and approval of inspection plans ensuring that the necessary inspection requirements, methods, and acceptance criteria have been identified;

d. Documentation of inspection results.

Audits, surveillances, and inspections, are performed as appropriate, to verify that any vendor utilized to perform quality activities for the Station nuclear power plants are effectively complying with their quality assurance program requirements for inspection and for the performance or witnessing of inspections at hold or notification points identified in procurement documents. **Oversight** performs audits, surveillances, and inspections, as appropriate, of

onsite vendor activities in this area. All audit, surveillance, and inspection activities are performed under requirements specified in quality procedures.

10.2.2 INSPECTION PLANS

Documented inspection plans may be either a separate document or an integral part of work instruction documents. The plans are based on design specifications, procurement documents, drawings, other specifications, or previous experience, as appropriate.

During the performance of quality activities, procedures provide criteria for the determination of accuracy requirements of inspection equipment and when inspections are required. These procedures describe requirements for the preparation of inspection plans by **Oversight**. Audits and surveillances are performed by **Oversight**, as appropriate, to verify the implementation of the inspection plans.

The inspection criteria, including the use of inspection equipment and their accuracy requirements, are specified in the work procedures, work documents, or inspection plans.

10.2.3 INSPECTION PERSONNEL AND INSPECTION DOCUMENT ACCESS

Inspections are performed by individuals other than those who performed or directly supervised the activity being inspected. Inspection personnel are qualified and/or certified in accordance with appropriate codes, standards, and/or NU training programs;

Inspections are performed by **Oversight** personnel, qualified contracted personnel, and NUSCO/NNECO personnel who are independent from undue pressure such as cost, or schedule considerations. **Oversight** shall assure the certification of its contracted inspection personnel is acceptable prior to the performance of inspection activities. When other departments are contracting for onsite quality assurance inspection services, these departments shall be responsible for the review and acceptability of personnel/equipment certification prior to the start of inspection activities. **Oversight** shall perform audits and surveillances, as appropriate, to verify other department compliance with these requirements.

When vendors are contracted to perform onsite inspection services, their quality control inspection plans/procedures are reviewed and concurred with by **Oversight** in accordance with QAP 5.0, "Procedures, Instructions, and Drawings".

Access to drawings, procedures, specifications or other documented criteria necessary for the performance of inspections is provided prior to performing the inspection activity.

10.2.4 INSPECTION PROCEDURES

Required inspection or surveillance activities are performed and documented according to procedures and/or checklists. Inspection procedures, plans or checklists contain the following:

a. Identification of characteristics to be inspected;

b. Identification of the individual or groups responsible for performing the inspections;

c. Requirements for the necessary measuring and test equipment and the required accuracy of this equipment;

d. Acceptance criteria;

e. A description of the method of inspection when other than direct visual examination using the unaided eye;

f. A record of the results of the inspection;

g. Record of inspector or data recorder.

Procedures specify surveillance of processing methods or testing and operation of equipment when inspection is impossible, inaccessible or not applicable.

Modification, repair, replacement, or rework items are inspected in accordance with original inspection requirements or approved alternatives.

10.2.5 MANDATORY HOLD AND NOTIFICATION POINTS

Mandatory hold points are utilized when an inspection or operation must be performed or witnessed and signed off by the responsible personnel before work can proceed. Mandatory hold points are identified to assure attributes critical to achieving quality requirements at work completion have been verified. Mandatory notification points are used to identify the operations or completed processes that NNECO or its representatives may elect to witness and/or inspect during the fabrication, construction and installation process. Mandatory hold points and notification points, as required, are identified in procurement documents and onsite work procedures/work documents. Procurement documents and onsite work procedures/work documents are subject to the review and concurrence for adequacy of inspection, notification and/or mandatory hold controls by ***Procure the Asset*** and **Oversight**, respectively.

10.2.6 INSPECTION RESULTS EVALUATION

Inspection results are evaluated for acceptability in accordance with applicable procedures which identify the responsible organization.

The evaluations are performed by the personnel who are qualified in accordance with the appropriate regulatory guide and endorsed ANSI standard listed in Appendix C.

Oversight performs audits and surveillances, as appropriate, to verify that inspections are performed in accordance with the requirements of applicable procedures.

11.0 TEST CONTROL

11.1 GENERAL REQUIREMENTS

This NUQAP requires a documented test control program for Millstone Station nuclear power plants quality structures, systems, and components be established to assure that they will perform satisfactorily in service and that test results are documented in accordance with applicable regulatory and technical requirements.

The test control program identifies the quality structures, systems, and components to be tested, method of conducting tests, evaluation of tests and documentation of tests by qualified personnel to assure requirements have been satisfied.

The test control program is systematic and includes proof tests prior to installation, construction tests, operational tests, surveillance tests, and tests following repairs, reworks, replacements, preventive maintenance or modifications as required to verify performance will be satisfactory during operation.

11.2 IMPLEMENTATION

11.2.1 TEST PROGRAM

Test requirements to determine or to verify the capability of an item to meet specified requirements in accordance with design documents, Safety Analysis Reports (SAR), Technical Specifications, procedures or procurement documents, as appropriate, are accomplished by subjecting the item to a set of physical, chemical, environmental or operating conditions. Tests following repair, rework, replacement, preventive maintenance or modification is performed, as required, in accordance with the original design requirements of the item or acceptable alternatives, as applicable. A Test may be repeated when original test results are invalidated.

NUSCO/NNECO procedures delineate the methods and responsibilities for controlling, accomplishing and documenting testing of the Station nuclear power plants quality structures, systems, and components.

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing measures for the control of tests to assure that materials, equipment and parts used in quality structures, systems, and components will perform satisfactorily. Audits, surveillances, and inspections, are performed as appropriate, to verify the performance of selected proof tests when hold points have been identified in purchase order/contracts and to verify these vendors are complying with their quality assurance program requirements for test control. **Oversight** performs audits, surveillances, and inspections, as appropriate, of onsite vendor activities in this area. ***Procure the Asset*** and **Oversight** are responsible for assuring documentation associated with these verification activities are maintained in the appropriate files until forwarded to the Station Nuclear Records Facility in accordance with applicable procedures.

Proof tests, product acceptance tests, post maintenance or modification tests, and periodic surveillance tests are conducted by qualified personnel in accordance with applicable procedures. Personnel performing tests assure that calibrated equipment and instrumentation utilized are within the calibration interval specified. Documentation including test procedures and approved data sheets are maintained in appropriate files until forwarded to the Station Nuclear Records Facility in accordance with applicable procedures.

11.2.2 TEST PROCEDURE PREPARATION AND TEST PERFORMANCE

Testing is accomplished in accordance with approved test procedures which incorporate or reference the requirements and acceptance criteria in the applicable design and procurement documents. The test procedure or test program documents include the following as a minimum:

a. Instructions for the testing method used;

b. Required test equipment and instrumentation;

c. Test requirements, such as acceptance criteria;

d. Hold, notification, inspection points, if required, and data collection points;

e. Test prerequisites such as: calibrated instrumentation; trained, qualified, and licensed or certified personnel; preparation, condition and completeness of item to be tested; suitable and controlled environmental conditions;

f. Methods for documenting or recording test data and results;

g. Provisions for data collection and storage.

11.2.3 TEST EQUIPMENT

NUSCO/NNECO procedures provide the criteria for determining when a test is required and the accuracy requirements of test equipment. The following steps are taken for the control of test equipment:

a. To assure accuracy, test equipment is checked and calibrated in accordance with NUSCO/NNECO procedures;

b. Plant instrumentation used in testing is calibrated. It is maintained in calibration at regular intervals in accordance with established surveillance and/or preventative maintenance procedures;

c. Where special instrumentation is required for testing, the requirements are stated in the procedures. Instrument characteristics, including accuracy requirements, are equivalent to or better than those specified by the vendor.

11.2.4 EVALUATION OF TEST RESULTS

The documented test results are evaluated against the predetermined acceptance criteria by an individual or group having appropriate qualifications. The acceptance status of the test is documented. Deficiencies noted during the evaluation are documented and dispositioned in accordance with procedures.

The evaluation of test results may also be delegated to vendors. When delegated, the vendor is required to assure the use of qualified personnel, evaluate the data against predetermined criteria and document the results of the evaluation and acceptance status of the test. Audits, surveillances, and inspections, are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for test control. **Oversight** performs audits, surveillances, and inspections, as appropriate, of onsite vendor activities in this area.

12.0 CONTROL OF MEASURING AND TESTING EQUIPMENT

12.1 GENERAL REQUIREMENTS

This NUQAP provides measures for the control of measuring and testing equipment (M&TE) used as the basis for acceptance during inspection, testing, and measurement of materials, equipment, and parts affecting quality structures, systems, and components. Periodic calibration and adjustment of M&TE is performed and controlled to assure accuracy is maintained within limits necessary to verify that design and operating condition requirements have been met. Documentation is retained such that all items of M&TE are traceable to their calibration records.

12.2 IMPLEMENTATION

12.2.1 CALIBRATION PROGRAM

Procedures delineate the methods and responsibilities for the control, maintenance and calibration of M&TE including portable and temporarily installed instruments, tools, gages, fixtures, reference and transfer standards, and nondestructive test equipment.

Documentation associated with the calibration of all M&TE is maintained in appropriate files and retained as quality records in accordance with the NU Nuclear Records Program. When the information for the control, use, and calibration of M&TE is in electronic form, this information is controlled and protected in accordance with applicable procedures.

The calibration program is implemented in accordance with the requirements defined in NUSCO/NNECO procedures which describe the measures utilized to maintain the calibration of the M&TE. Functional groups are responsible for implementing these procedures which comply with the requirements contained in specifications and drawings. Procedures related to the M&TE calibration program are reviewed and approved by the appropriate on-site review committeeor the Station Qualified Reviewer Program, as defined in applicable procedures. ***Procure the Asset*** or the appropriate M&TE custodian, as delineated by the purchase order, is responsible for verifying that receipt of calibrated equipment is in conformance with the requirements of procurement documents. ***Procure the Asset*** and **Oversight** are responsible for control of calibrated M&TE used during their inspections.

Department heads/job supervisors are responsible to assure that M&TE is calibrated, issued, and controlled in accordance with the requirements of applicable procedures.

Oversight performs audits, surveillances, and inspections, as appropriate, to verify implementation of the calibration program.

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing measures for the control of M&TE to assure the M&TE are properly calibrated, adjusted and maintained at specified intervals in order to

maintain accuracy within required limits. Audits, surveillances, and inspections, are performed, as appropriate, to verify these vendors are effectively complying with their quality assurance program requirements for control of M&TE.

12.2.2 CALIBRATION STANDARDS

Measuring and test equipment is calibrated at specified intervals based on the required accuracy, purpose, degree of usage, stability characteristics, and other conditions affecting the measurement. Measuring and test equipment shall be permanently marked or tagged with a unique Identification number and the date calibrated and next calibration date indicated on the M&TE.

Procedures describe the measures taken to assure that reference and transfer standards are traceable to nationally recognized standards and that, where national standards do not exist, provisions are established to document the basis for calibration.

Calibration of this equipment should be against standards that have an accuracy of at least four times the required accuracy of the equipment being calibrated. When this is not possible, the standards shall have an accuracy that assures the equipment being calibrated shall be within required tolerance and the basis of acceptance is documented and authorized by the appropriate on-site review committee. In addition, the calibrating standards shall have greater accuracy than secondary standards being calibrated. Calibrating standards with the same accuracy may be used if they can be shown to be adequate for the requirements and the basis of acceptance is documented.

12.2.3 "OUT OF TOLERANCE" CONTROL

M&TE and reference standards when found out of tolerance are so identified and removed from service. A timely review is conducted to determine the validity of previous inspection or test results gained through use of the instrument, and of the acceptability of items previously measured or tested. Where it is determined that use of out of tolerance measuring and test equipment may have resulted in a condition adverse to quality, the condition is promptly identified and corrective action is implemented in accordance with QAP 15, "Nonconforming Materials, Parts, Components or Services" and QAP 16, "Corrective Action" respectively as appropriate.

14.0 INSPECTION, TEST AND OPERATING STATUS

14.1 GENERAL REQUIREMENTS

This NUQAP provides measures for indication, by the use of marking such as stamps, tags, labels or other suitable means, the status of tests and inspections of materials, equipment and parts to preclude the inadvertent bypassing of inspection and test requirements during quality activities performed for the Millstone Station nuclear power plants. These measures provide for the identification of items which have satisfactorily passed required inspections and tests. Measures are also established for indicating the operating status of quality structures, systems, and components to prevent inadvertent operation.

14.2 IMPLEMENTATION

14.2.1 GENERAL

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible for implementing approved measures for the identification of inspection and test status of quality material, equipment and parts to preclude the bypassing of requirements. Audits, surveillances, and inspections, are performed, as appropriate, to verify that these vendors are effectively complying with their quality assurance program requirements for identification of inspection and test status. Elements of this system require that vendors have a controlled fabrication and test operation in order to preclude the inadvertent bypassing of process inspections or tests, and to provide a positive identification of component status throughout all phases of fabrication, testing, and inspection by means of tagging, routing cards, stamping, manufacturing or test reports, labeling or other appropriate methods.

When receipt inspections are performed at the Station, ***Procure the Asset*** assures that traceability is maintained for acceptable quality materials, equipment and parts to indicate conformance to purchase order/contract requirements with the exception of nuclear fuel assemblies, for which traceability is maintained by ***Nuclear Fuels and Safety Analysis***. Nonconforming materials, equipment and parts are identified in accordance with QAP 15.0, " Nonconforming Materials, Parts, Components, or Services."

During tests and inspections of the Station nuclear power plants, a status tagging system is implemented by procedure to prevent inadvertent operations of quality structures, systems, and components.

NUSCO/NNECO procedures describe the measures taken to control the altering of the sequence of required tests, inspections and other operations. The review and approval for these actions is subject to the same control as taken during the original review and approval of tests, inspections and other operations.

Procedures and instructions describe control of the application and removal of markings such as stamps, tags, labels, and other suitable means to indicate the status of quality structures, systems, and components to prevent inadvertent operation, and to preclude omission of inspections, tests or other critical operations. These procedures and instructions delineate the requirements, methods and responsibilities for indicating the status of the affected items. The status of all items requiring calibration is recorded and maintained in accordance with applicable procedures.

Records associated with status identification are maintained in accordance with applicable procedures.

15.0 NONCONFORMING MATERIALS, PARTS, COMPONENTS OR SERVICES

15.1 GENERAL REQUIREMENTS

This NUQAP requires the documentation and control of nonconforming materials, parts, components, or services be performed in accordance with procedures to prevent inadvertent use or installation in Millstone Station nuclear power plant quality structures, systems, or components. These procedures include requirements for identification, documentation, segregation and disposition of nonconforming items; and notification to affected organizations.

15.2 IMPLEMENTATION

15.2.1 PROGRAM

Procedures define personnel responsibilities and establish various measures for identification, documentation, segregation, review and disposition of nonconforming item reports. The means for reporting nonconforming items are available to all NU and vendor personnel assigned at the Millstone Power Station and other personnel involved with Station quality activities.

15.2.2 DOCUMENTATION

Documentation of nonconforming items requires identification of the items, description of the nonconformance, disposition of the nonconformance, inspection requirements and signature approval of the disposition.

Tagging systems are utilized to physically identify nonconforming items prior to installation. ***Procure the Asset*** utilizes tags for received materials, parts and components.

15.2.3 EVALUATION AND DISPOSITION

Evaluations are performed to determine the disposition of nonconforming items and services. The evaluation determines whether an item or service is to be used as is, returned to vendor, repaired, reworked, scrapped or salvaged. An engineering evaluation is performed, if necessary, prior to the resolution of nonconforming conditions. In addition, nonconformances are evaluated for impact on quality structure, system and component operability in accordance with applicable procedures. These evaluations assure that the final condition does not adversely affect safety, operation or maintenance of the item or service. Nonconforming item reports involving deviation from design bases such as "use as is" or "repair" are forwarded to the appropriate engineering organization for review, and disposition. Applicable information is accumulated and records are maintained.

The need to release/use nonconforming materials, parts or components shall be based on such considerations as:

a. Impact on plant safety;

b. Safety of personnel;

c. Suitability of items in the "as is" condition, i.e., probability of eventual satisfactory resolution of the nonconforming condition without repair, rework or replacement.

d. Accessibility of items after release;

e. Cost of removal and repair or replacement should items eventually have to be removed, repaired, or replaced;

f. Effect on the orderly progress of work.

Items repaired are verified by inspecting the items as originally inspected or by a documented method which is equivalent to the original inspection method. Items reworked may require inspection to verify conformance to requirements as defined in applicable procedures.

Oversight performs audits and surveillances, as appropriate, to verify that dispositions for reports documenting nonconforming conditions are adequate.

15.2.4 RECURRENCE CONTROL

A trend analysis of nonconforming conditions documenting program/procedural problems is performed in accordance with procedures. The trend analysis results are periodically reported to upper management, including the senior onsite and offsite nuclear officers and the senior manager responsible for measuring the effectiveness of the quality assurance program, for review and assessment as part of the Station Corrective Action Program reporting as described in QAP 16.0, Corrective Action.

16.0 CORRECTIVE ACTION

16.1 GENERAL REQUIREMENTS

This NUQAP requires that an effective corrective action program be established to assure that conditions adverse to quality at the Millstone Power Station are promptly identified, corrected, and documented in accordance with procedures. These procedures include measures for reporting to appropriate levels of management and determining the root cause and corrective action to preclude recurrence for conditions evaluated as significant conditions adverse to quality.

16.2 IMPLEMENTATION

16.2.1 PROGRAM

Procedures define personnel responsibilities and establish various measures for identification, documentation, review, engineering evaluation, disposition and correction of conditions adverse to quality. The means to identify conditions adverse to quality are available to all NU and vendor personnel assigned to the Millstone Power Station and other personnel involved with Station quality activities.

16.2.2 CORRECTIVE ACTION AND FOLLOW-UP

Procedures describe the measures taken to evaluate if conditions adverse to quality exist and to determine the need for immediate corrective action or disposition. Vice Presidents are responsible for assuring their assigned personnel and their vendors working onsite comply with the corrective action program and for assuring that corrective action is adequate and properly implemented in a timely manner within their organization. Oversight performs audits and surveillances, as appropriate, to verify that NUSCO/NNECO departments are effectively complying with this NUQAP and procedural requirements for the corrective action program and that corrective action is adequate and properly implemented in a timely manner. Audits, surveillances, and inspections, are performed, as appropriate to assure that vendors comply with their corrective action program and that corrective action is adequate.

The Senior Vice President and Chief Nuclear Officer - Millstone has the final authority in the event that agreement on the action to be taken is not reached at lower levels of the nuclear organization.

16.2.3 RECURRENCE CONTROL

Procedures identify responsibility and provide direction for determining appropriate significance level based on actual or potential consequences for conditions adverse to quality.

The significance level determines the need for a root cause determination and for establishing the necessary action to prevent recurrence. In cases of significant conditions adverse to quality, the immediate corrective action, the cause, and recurrence control actions must be documented. Procedures establish the responsibilities and measures taken to accomplish these actions.

An analysis of adverse conditions is performed and trends which identify program/procedure problems are periodically reported to upper management, including the senior onsite and offsite nuclear officers and the senior manager responsible for measuring the effectiveness of the quality assurance program for review. Adverse trends concerning specific vendor performance shall be reported to the affected vendor for resolution and recurrence control, as appropriate.

17.0 QUALITY ASSURANCE RECORDS

17.1 GENERAL REQUIREMENTS

This NUQAP requires the maintenance, identification, retention and retrieval of records to furnish evidence of quality activities performed for the Millstone Station nuclear power plants be implemented in accordance with procedures. These records include but are not limited to: operating logs and the results of reviews, inspections, tests, audits, monitoring of work performance and material analyses. These records also include closely related data such as qualifications of personnel, procedures and equipment. Inspection and test records contain, as a minimum but are not limited to: identification of inspector or data recorder and the acceptability and the action taken in connection with any deficiencies and reportable occurrences noted. Procedures establish requirements concerning record retention such as duration, location and assigned responsibility.

17.2 IMPLEMENTATION

NUSCO/NNECO procedures establish the responsibilities and requirements for the maintenance, identification, retention (e.g., duration, location) and retrievability of records pertaining to materials, equipment, parts, processes or operations relating to quality structures, systems, and components which when founded on observations, measurements or tests can be fully verified, and documented by cognizant personnel.

Vendors utilized to perform quality activities for the Station nuclear power plants are responsible to implement measures for identification, maintenance, retention, retrieval and turnover to NNECO of documented and approved records which contain objective evidence of quality as specified in purchase orders/contracts. Audits, surveillances, and inspections, are performed, as appropriate, to verify that these vendors are effectively complying with their program for quality assurance records.

NUSCO/NNECO quality assurance records are identified, controlled and maintained in appropriate files and are identifiable to specific structures, systems, and components within the Station nuclear power plants. When identification to a specific structure, system, or component is not practical, records are filed by category (e.g., specification, nonconformance reports, audits, etc.).

17.3 RETENTION

NUSCO/NNECO quality assurance records are classified as life records or non-life records as delineated by ***Procedures &*** Document Services. Non-life records are those documents that are maintained for a specific period of time other than the lifetime of a Station nuclear power plant or the particular component or part. Life records are those documents that are maintained for the lifetime of the in-service nuclear power plant or for the life of the particular component or part. In instances where more than one licensing basis document specifies a record retention requirement and they are different (e.g. QA Program commitment versus Unit Technical Specifications) the more restrictive requirement shall apply. Life records are those which would be of significant value in meeting one or more of the following criteria:

a. Demonstrating capability for safe operations;

b. Maintaining, reworking, repairing, replacing or modifying the item;

c. Determining the cause of an accident or malfunction of an item;

d. Providing required base line data for in-service inspection.

Quality assurance records are reviewed and approved by the cognizant qualified NUSCO/NNECO personnel and vendors, as appropriate, and are transmitted to the Station Nuclear Document Records Facility. The responsibility of the Nuclear Document Services Facility upon receipt of records is to maintain and provide controlled retrievability of records affecting the Station nuclear power plants, in such a manner as to prevent destruction of records by fire, flood, theft, and environmental conditions, such as temperature or humidity, as delineated in applicable procedures.

18.0 AUDITS

18.1 GENERAL REQUIREMENTS

This NUQAP requires that a comprehensive system of planned and periodic audits shall be carried out to verify that quality activities for Millstone Station nuclear power plants are performed in compliance with this NUQAP and to determine the effectiveness of the program.

Audits are conducted in accordance with written procedures or checklists by appropriately trained personnel not having direct responsibilities in the areas being audited.

Audit results are documented and reviewed by management having responsibility in the area audited and the responsible management takes the necessary action to address any audit findings revealed by the audit.

18.2 IMPLEMENTATION

18.2.1 PROGRAM

The audit program requires audits of Corporate and Station nuclear power plant quality activities under the oversight of the Nuclear Safety Assessment Board. Audits are performed on activities where the requirements of 10 CFR 50, Appendix B and respective nuclear unit Technical Specifications are being implemented. In addition to those activities, audits are performed on areas associated with indoctrination and training programs, interface control among NNECO and vendors, vendor quality programs and the **Procure the Asset** procurement function. Audits are regularly scheduled on the basis of the status and safety importance of the activities being performed. Regularly scheduled audits are supplemented by audits for one or more of the following conditions:

a. When significant changes are made in functional areas of the quality assurance program, such as significant reorganization or procedure revisions;

b. When it is suspected that the quality of the item is in jeopardy due to deficiencies in the quality assurance program;

c. When a systematic, independent assessment of program effectiveness is considered necessary;

d. When necessary to verify implementation of required corrective action.

Schedules for the audit of Corporate, and Station, quality activities are originated and maintained by **Oversight**. Schedules for vendor quality assurance activities are maintained by the ***Procure the Asset*** and **Oversight**, as appropriate.

Audits are performed as specified in procedures by qualified personnel, using an audit plan prepared by the auditing organization. Audits may include evaluation of the work areas, activities, processes, items, and review of documents and records to determine the effectiveness of implementation and conformance to this NUQAP.

Approved vendors utilized to perform quality activities for the Station nuclear power plants are responsible for developing and implementing a system of planned and periodic audits to verify compliance with and to determine the effectiveness of all aspects of their quality assurance program. ***Procure the Asset*** is responsible for verifying the acceptability of vendor audit programs. Audits, are performed as appropriate, to verify that these vendors are effectively complying with their quality assurance requirements.

In addition to the audits, other methods, such as surveillances and inspections are used to assure that quality activities are in compliance with this NUQAP.

18.2.2 REPORTING OF AUDIT RESULTS

Audit results are reviewed, approved, and reported in accordance with **Oversight** and ***Procure the Asset*** procedures, as applicable. The audit reports are issued to the appropriate management of the area audited to assure appropriate and/or timely corrective action is taken to address conditions adverse to quality identified by the audit findings. In addition, audit data and reports are accumulated as part of the review for quality trends and assessed to assure the effectiveness of this NUQAP.

18.2.3 REVIEW, ACTION, AND FOLLOW-UP OF AUDIT FINDINGS

Audit findings that involve conditions adverse to quality are reviewed and investigated by the management having the responsibility for the area audited. The responsible management is required to take the necessary action to address any conditions adverse to quality identified by the audit and: report the results of such reviews and investigations, take the necessary actions to correct problems reported, and report the completion of corrective action within specified time frames.

Follow-up of audit findings involving conditions adverse to quality is performed by the auditing organization as necessary to verify appropriate actions have been taken to resolve audit findings. Items which cannot be resolved by affected management are submitted for resolution to the Senior Vice President and Chief Nuclear Officer - Millstone.

18.2.4 RECORDS/REPORTS OF AUDITS

Audit records, reports, and associated documentation are retained in the Station Nuclear Document Services Facility, as specified in applicable procedures.

APPENDIX B

NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP) TOPICAL REPORT - MILLSTONE POWER STATION

QUALIFICATION AND EXPERIENCE REQUIREMENTS

This appendix consolidates specific qualification and experience requirements for several key positions within the NNECO organization. Much of this material was relocated from the Unit 3 Final Safety Analysis Report.

PROCESS OWNER - OVERSIGHT

The ***Process Owner - Oversight*** shall satisfy the following requirements:

Graduate of a four-year accredited engineering or science college or university, plus fifteen (15) or more years of industrial experience including five years in positions of leadership, such as lead engineer, project engineer, Audit team leader, etc. At least two years of this experience should be associated with nuclear Quality Assurance Activities, and at least one year of this experience is in a Quality Assurance Organization. A masters degree in engineering or business management is considered equivalent to two years of experience.

Note: The education and experience requirements should not be treated as absolute when similar training or an outstanding record provides reasonable assurance that a person can perform the required tasks.

ANSI N18.1-1971 Requirements

As stated in Appendix C, education and experience requirements for Millstone Station personnel are established by ANSI N18.1 as endorsed by Regulatory Guide 1.8-1977, subject to the exceptions in Appendix E. The table below identifies ANSI N18.1 requirements applicable to specific positions at Millstone Units 2 and 3.

Table B-1

Position	Applicable ANSI N18.1-1971 Requirements
Master Process Owner - Operate the Asset	Plant Manager (4.2.1)*
Process Owner - Chemistry	Radiochemistry (4.4.3)
Process Owner-Radiological Protection	Radiation Protection (4.4.4) - See Note 1
Process Owner - Operations	Operations Manager (4.2.2) - See Note 2
Shift Managers, **Unit Supervisors**	Supervisors Requiring AEC Licenses (4.3.1)
Control Operators, Plant Equipment Operators	Operators (4.5.1)
Process Owner - Plant Reliability 3	Instrumentation & Control (4.4.2)
Master Process Owner - Maintain the Asset ***Deputy Master Process Owner - Maintain the Asset***	Maintenance Manager (4.2.3)
Mechanics, Electricians, Technicians (repairmen)	Repairmen (4.5.3)
Process Owner - Asset Production ***Process Owner - Configuration Control*** ***Process Owner - Asset Strategy*** ***Process Owner - Nuclear Fuel*** ***Process Owner - Technical*** ***Process Owner - Maintenance Support Services*** ***Deputy Master Process Owner - Manage the Asset***	Technical Manager (4.2.4)
Team Lead - Reactor Engineering	Reactor Engineering and Physics (4.4.1)

* Numbers in () refer to section numbers in ANSI N18.1-1971.

Notes:

1. For the position of ***Process Owner - Radiological Protection***, the qualifications considered as minimum acceptable substitutes for a bachelor's degree equivalent are: a high school diploma or its equivalent and four years of applied managerial experience at a nuclear facility in the area of radiation protection.

2. If the Unit 3 ***Process Owner*** - Operations does not hold an SRO license for Unit 3, then the ***Process Owner*** - Operations shall have held an SRO license at a pressurized water reactor (PWR), and the Assistant Manager - Operations shall hold an SRO license for Unit 3.

   If the Unit 2 ***Process Owner*** - Operations does not hold an SRO license for Unit 2, then the ***Process Owner*** - Operations shall have held an SRO license at a PWR, and an individual serving in the capacity of the Assistant Manager - Operations shall hold an SRO ***license*** for Unit 2.

APPENDIX F
NORTHEAST UTILITIES QUALITY ASSURANCE PROGRAM (NUQAP)
TOPICAL REPORT - MILLSTONE POWER STATION

ADMINISTRATIVE CONTROLS[1]

NOTE:
1. "Technical Specification" numbers refer to the unit specific Unit 2/3 Technical Specifications only.

INDEPENDENT SAFETY ENGINEERING GROUP (ISEG) - Unit 3 Only

Function

The ISEG shall include, as part of its function, examination of unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of unit design and operating experience information, including units of similar design, which may indicate areas for improving unit safety. The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities, or other means of improving unit safety to appropriate station/corporation management.

Composition

The ISEG shall be composed of at least four full-time personnel located on site to perform the functions described above for Millstone Unit 3. Each person shall have either:

(1) A bachelor's degree in engineering or related science and at least 2 years of professional level experience in his field, at least 1 year of which experience shall be in the nuclear field, or,

(2) At least 10 years of professional level experience in his field, at least 5 years of which experience shall be in the nuclear field.

A minimum of 50% of these personnel shall have the qualifications specified in (1) above.

Responsibilities

The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification* that these activities are performed correctly and that human errors are reduced as much as practical.

Records

Records of activities performed by the ISEG shall be prepared and maintained, and quarterly reports of completed safety evaluations will be made to the ***Process Owner*** - Oversight.

*Not responsible for sign-off function

REVIEW AND AUDIT

Unit 2/3 Plant Operations Review Committee (Unit 2/3 PORC)

Function

The Unit 2/3 PORC shall function to advise the ***Master Process Owner (MPO) - Operate the Asset*** on all matters related to nuclear safety.

Composition

The Unit 2/3 PORC shall be composed of a minimum of eleven members. Members shall collectively have experience and expertise in the following areas:

Plant Operations
Engineering
Reactor Engineering
Maintenance
Instrumentation and Controls
Health Physics
Chemistry
Work Planning
Quality Assurance

Each Unit 2/3 PORC member shall meet the following minimum qualifications:

1) Have an academic degree in an engineering or physical science field, and have a minimum of five years technical experience in their respective field of expertise,
   or
2) Hold a management position, and have a minimum of five years technical experience in their respective field of expertise.

The members of Unit 2/3 PORC shall be appointed in writing by the ***Master Process Owner (MPO) - Operate the Asset.*** The Unit 2/3 PORC Chairperson and two Vice Chairpersons of the Unit 2/3 PORC shall be drawn from the selected Unit 2/3 PORC members and be appointed in writing by the ***Master Process Owner - Operate the Asset.***

Alternates

The Unit 2/3 PORC Chairperson shall appoint designated alternates for each member in writing to serve on a temporary basis. Each alternate shall meet the minimum qualifications described above for Unit 2/3 PORC members, and shall have the same area of expertise as the member he/she is replacing.

Meeting Frequency

The Unit 2/3 PORC shall meet at least once per calendar month and as convened by the Chairperson.

Quorum

A quorum of the Unit 2/3 PORC shall consist of the Chairperson, or a Vice Chairperson, and four members or designated alternates. However, no more than two alternates may vote at any one time.

Responsibilities

The Unit 2/3 PORC shall be responsible for:

a. Review of: (1) all procedures, except common site procedures, required by Technical Specification 6.8 and changes thereto, 2) all programs, except common site programs required by Technical Specification 6.8 and changes thereto, and (3) any other proposed procedures, programs or changes thereto as determined by the ***Master Process Owner - Operate the Asset*** to affect nuclear safety. Procedures and programs required by Technical Specification 6.8 that are designated for review and approval by the Station Qualified Reviewer Program do not require Unit 2/3 PORC review.

b. Review of all proposed tests and experiments that affect nuclear safety;

c. Review of all proposed changes to Sections 1.0-5.0 of the Technical Specifications;

d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety;

e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Senior Vice President and CNO - Millstone and to the Chairperson of the Nuclear Safety Assessment Board;

f. Review of all REPORTABLE EVENTS;

g. Review of facility operations to detect potential safety hazards;

h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Chairperson of the Nuclear Safety Assessment Board.

i. Render determinations in writing if any item considered under (a) through (d) above, as appropriate and as provided by 10CFR50.59 or 10CFR50.92, constitutes an unreviewed safety question, or requires a significant hazards consideration determination.

j. Review of Unit Turbine Overspeed Protection Maintenance and Testing Program and revision thereto.

k. Review of the Fire Protection Program and implementing procedures.

Authority

The Unit 2/3 PORC shall:

a. Recommend to the ***Master Process Owner - Operate the Asset*** written approval or disapproval of items considered under Responsibilities (a) through (d) above.

b. Provide immediate written notification to the Senior Vice President and CNO - Millstone and the Chairperson of the Nuclear Safety Assessment Board of disagreement between the Unit 2/3 PORC and the ***Master Process Owner - Operate the Asset***; however, the ***Master Process Owner - Operate the Asset*** shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

Records

The Unit 2/3 PORC shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President and CNO - Millstone and Chairperson of the Nuclear Safety Assessment Board.

Site Operations Review Committee (SORC)

Function

The SORC shall function to advise the Senior Vice President and CNO - Millstone on all matters related to nuclear safety of the entire Millstone Station Site.

Composition

The SORC shall be composed of the:

Member:	Director - Unit 1 Operations
Member:	***Master Process Owner- Operate the Asset***
Member:	***Process Owner - Operations Millstone 2***
Member:	***Process Owner - Operations Millstone 3***
Member:	***Process Owner - Radiological Protection***
Member:	***Master Process Owner - Support*** Services
Member:	Designated Member of Unit 1 PORC
Member:	Designated Member of Unit 2/3 PORC
Member:	**Designated Member of Unit 2/3 PORC**
Member:	***Designated Member of Unit 2/3 PORC***
Member:	Designated Member of Oversight

The SORC Chairperson and two Vice Chairpersons of the SORC shall be drawn from the selected SORC members and be appointed in writing by the Senior Vice President and CNO Millstone.

Alternates:

Alternate members shall be appointed in writing by the SORC Chairperson to serve on a temporary basis; however, no more than two alternates shall participate in SORC activities at one time.

Meeting Frequency

The SORC shall meet at least once per six months and as convened by the SORC Chairperson.

Quorum

A quorum of the SORC shall consist of the Chairperson or Vice Chairperson and five members including alternates.

Responsibilities

The SORC shall be responsible for:

a. Review of 1) all common site procedures required by Unit 2/3 Technical Specification 6.8 and changes thereto, 2) all common site programs, required by Unit 2/3 Technical Specification 6.8 and changes thereto, 3) any other proposed procedures, programs, or changes thereto as determined by the designated officer [Senior Vice President and CNO - Millstone] to affect site nuclear safety. Common site programs and procedures required by Unit 2/3 Technical Specification 6.8 that are designated for review and approval by the Station Qualified Reviewer Program do not require SORC review.

b. Review of all proposed changes to " Section 6.0 "Administrative Controls" of the Technical Specifications.

c. Performance of special reviews and investigations and reports as requested by the Chairperson of the Nuclear Safety Assessment Board.

d. Not used.

e. Not used.

f. Review of all common site proposed tests and experiments that affect nuclear safety.

g. Review of all common site proposed changes or modifications to systems or equipment that affect nuclear safety.

h. Render determinations in writing or meeting minutes if any item considered under (a) through (g) above, as appropriate and as provided by 10CFR50.59 or 10CFR50.92, constitutes an unreviewed safety question or requires a significant hazards consideration determination.

i. Review of the common site fire protection program and implementing procedures.

Authority

The SORC shall:

a. Recommend to the Senior Vice President and CNO - Millstone written approval or disapproval in meeting minutes of items considered under Responsibilities (a) through (i) above.

b. Provide immediate written notification or meeting minutes to the President and Chief Executive Officer (CEO) and the Chairperson of the Nuclear Safety Assessment Board of disagreement between the SORC and the Senior Vice President and CNO - Millstone; however, the Senior Vice President and CNO - Millstone shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

Records

The SORC shall maintain written minutes of each meeting and copies shall be provided to the Senior Vice President and CNO - Millstone and Chairperson of the Nuclear Safety Assessment Board.

Nuclear Safety Assessment Board (NSAB)

Function

The minimum qualifications of NSAB members are as follows:

a. The Chairperson and NSAB members shall have:

1. An academic degree in an engineering or physical science field, or hold a senior management position, and

2. A minimum of five years technical experience in their respective field of expertise.

b. The NSAB shall have experience in and shall function to provide independent oversight review and audit of designated activities in the areas of:

1. Nuclear power plant operations;
2. Nuclear engineering;
3. Chemistry and radiochemistry;
4. Metallurgy;
5. Instrumentation and control;
6. Radiological safety;
7. Mechanical and electrical engineering; and
8. Quality assurance practices.

The NSAB serves to advise the Senior Vice President and CNO - Millstone on matters related to nuclear safety and notify the Senior Vice President and CNO - Millstone within 24 hours of a safety significant disagreement between the NSAB and the organization or function being reviewed.

Composition

The Senior Vice President and CNO - Millstone shall appoint, in writing, a minimum of seven members to the NSAB and shall designate from this membership, in writing, a Chairperson and a Vice Chairperson. The membership shall function to provide independent review and audit in the areas listed in Function (b) above.

Alternates

All alternate members shall be appointed, in writing, by Senior Vice President and CNO - Millstone; however, no more than two alternates shall participate as members in NSAB activities at any one time.

Meeting Frequency

The NSAB shall meet at least once per calendar quarter.

Quorum

The quorum of the NSAB shall consist of a majority of NSAB members including the Chairperson or Vice Chairperson. No more than a minority of the quorum shall have line responsibility for operation of the same Northeast Utilities' nuclear unit. No more than two alternates shall be appointed as members at any meeting in fulfillment of the quorum requirements.

Review Responsibilities

The NSAB shall be responsible for the review of:

a. The safety evaluations for changes to procedures, equipment, or systems, and tests or experiments completed under the provisions of 10 CFR 50.59, to verify

that such actions did not constitute an unreviewed safety question as defined in 10 CFR 50.59;

b. Proposed changes to procedures, equipment, or systems that involve an unreviewed safety question as defined in 10 CFR 50.59;

c. Proposed tests or experiments that involve an unreviewed safety question as defined in 10 CFR 50.59;

d. Proposed changes to Technical Specifications and the Operating License;

e. Violations of applicable codes, regulations, orders, license requirements, or internal procedures having nuclear safety significance;

f. All Licensee Event Reports required by 10 CFR 50.73;

g. Indications of significant unanticipated deficiencies in any aspect of design or operation of structures, systems, or components that could affect nuclear safety;

h. Significant accidental, unplanned, or uncontrolled radioactive releases, including corrective actions to prevent recurrence;

i. Significant operating abnormalities or deviations from normal and expected performance of equipment that could affect nuclear safety;

j. The performance of the corrective action program; and

k. Audits and audit plans.

Reports or records of these reviews shall be forwarded to the Senior Vice President and CNO - Millstone within 30 days following completion of the review.

Audit Program Responsibilities

The NSAB audit program shall be the responsibility of Oversight. NSAB audits shall be performed at least once per 24 months in accordance with administrative procedures and shall encompass:

a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions;

b. The training and qualifications of the unit staff;

c. The implementation of all programs required by Specification 6.8;

d. The Fire Protection Program and implementing procedures.

e. The fire protection equipment and program implementation utilizing either a qualified offsite license fire protection engineer or an outside independent fire protection consultant.

f. Actions taken to correct deficiencies occurring in equipment, structures, systems, components, or method of operation that affect nuclear safety; and

g. Other activities and documents as requested by the Senior Vice President and CNO - Millstone.

Records

Written records of reviews and audits shall be maintained. As a minimum these records shall include:

a. Results of the activities conducted under the provisions of this NSAB Section;

b. Deleted

c. Deleted

Station Qualified Reviewer Program

Function

The designated ***Master Process Owner***, **designated *Process Owner,*** designated officer, or Senior Vice President and CNO - Millstone may establish a Station Qualified Reviewer Program whereby required reviews of designated procedures or classes of procedures required by Unit 2/3 PORC, Responsibilities item (a), and SORC, Responsibilities item (a) are performed by Station Qualified Reviewers and approved by designated managers [Responsible Individual(s) for the procedure(s)]. These reviews are in lieu of reviews by the Unit 2/3 PORC or SORC. However, procedures which require a 10CFR50.59 evaluation must be reviewed by the Unit 2/3 PORC or SORC.

Responsibilities

The Station Qualified Reviewer Program shall:

a. Provide for the review of designated procedures, programs, and changes thereto by a Qualified Reviewer(s) other than the individual who prepared the procedure, program, or change.

b. Provide for cross-disciplinary review of procedures, programs, and changes thereto when organizations other than the preparing organization are affected by the procedure, program, or change.

c. Ensure cross-disciplinary reviews are performed by a Qualified Reviewer(s) in affected disciplines, or by other persons designated by cognizant ***Process Owner*** **or** ***Master Process Owner*** as having specific expertise required to assess a particular procedure, program, or change. Cross-disciplinary reviewers may function as a committee.

d. Provide for a screening of designated procedures, programs and changes thereto to determine if an evaluation should be performed in accordance with the provisions of 10CFR50.59 to verify that an unreviewed safety question does not exist. This screening will be performed by personnel trained and qualified in performing 10CFR50.59 evaluations.

e. Provide for written recommendation by the Qualified Reviewer(s) to the responsible ***Process Owner*** for approval or disapproval of procedures and programs considered under Unit 2/3 PORC, Responsibilities item (a) and

SORC, Responsibilities item (a), and that the procedure or program was screened by a qualified individual and found not to require a 10 CFR 50.59 evaluation.

If the responsible manager determines that a new program, procedure, or change thereto requires a 10 CFR 50.59 evaluation, that ***Process Owner*** will ensure the required evaluation is performed to determine if the new procedure, program, or change involves an unreviewed safety question. The new procedure, program, or change will then be forwarded with the 10 CFR 50.59 evaluation to Unit 2/3 PORC or SORC for review.

Personnel recommended to be Station Qualified Reviewers shall be designated in writing by the designated ***Master Process Owner, Process Owner*** or Senior Vice President and CNO - Millstone or- Vice President - ***Generation*** for each procedure, program, or class of procedure or program within the scope of the Station Qualified Reviewer Program.

Temporary procedure changes shall be made in accordance with Specification 6.8.3 with the exception that changes to procedures for which reviews are assigned to Qualified Reviewers will be reviewed and approved as described in Responsibilities (a) through (e) above.

Records

The review of procedures and programs performed under the Station Qualified Reviewer Program shall be documented in accordance with administrative procedures.

Training and Qualification

The training and qualification requirements of personnel designated as a Qualified Reviewer in accordance with the Station Qualified Reviewer Program shall be in accordance with administrative procedures. Qualified reviewers shall have:

a. A Bachelors degree in engineering, related science, or technical discipline, and two years of nuclear power plant experience;

OR

b. Six years of nuclear power plant experience;

OR

c. An equivalent combination of education and experience as approved by a ***Process Owner or Master Process Owner.***

SAFETY LIMIT VIOLATION - Units 2 and 3

The Senior Vice President and CNO - Millstone and the Chairperson of the NSAB shall be notified within 24 hours in the event a Safety Limit is violated.

The Safety Limit Violation Report shall be submitted to the Commission, the Chairperson of the NSAB, and the Senior Vice President and CNO - Millstone, within 14 days of the violations.

RECORD RETENTION - Unit 2

(1) The following records shall be retained for at least five years:

a. Records and logs of facility operation covering time interval at each power level.

b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

c. All REPORTABLE EVENTS.

d. Records of surveillance activities, inspections, and calibrations required by these technical specifications.

e. Records of reactor tests and experiments.

f. Records of changes made to operating procedures.

g. Records of radioactive shipments.

h. Records of sealed source leak tests and results.

i. Records of annual physical inventory of all sealed source material of record.

(2) The following records shall be retained for the duration of the facility operating license:

a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.

b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.

c. Records of facility radiation and contamination surveys.

d. Records of radiation exposure for all individuals entering radiation control areas.

e. Records of gaseous and liquid radioactive material released to the environs.

f. Records of transients or operational cycles for those facility components designed for a limited number of transients or cycles.

g. Records of training and qualification for current members of the plant staff.

h. Records of inservice inspections performed pursuant to the Technical Specifications.

i. Records of quality assurance activities required by the QA Manual.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Part 50.59.

k. Records of meetings of the Unit 2/3 PORC, the NSAB, and the SORC.

l. Records of Environmental Qualification which are covered under the provisions of Specification 6.13.

m. Records of reviews performed for changes made to the Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM) and the Process Control Program.

RECORD RETENTION - Unit 3 Only

(1) In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

(2) The following records shall be retained for at least five years:

a. Records and logs of unit operation covering time interval at each power level;

b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety;

c. All REPORTABLE EVENTS;

d. Records of surveillance activities, inspections, and calibrations required by Technical Specifications;

e. Records of changes made to the procedures required by Specifications 6.8.1;

f. Records of radioactive shipments;

g. Records of sealed source and fission detector leak tests and results; and

h. Records of annual physical inventory of all sealed source material of record.

(3) The following records shall be retained for the duration of the unit Operating License:

a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;

b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;

c. Records of radiation exposure for all individuals entering radiation control areas;

d. Records of gaseous and liquid radioactive material released to the environs;

e. Records of transient or operational cycles for those unit components identified in Technical Specifications Table 5.7-1.

f. Records of reactor tests and experiments;

g. Records of training and qualification for current members of the unit staff;

h. Records of inservice inspections performed pursuant to the Technical Specifications;

i. Records of quality assurance activities required by the Quality Assurance Topical Report not listed in (2) a. through (2) h. above;

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Part 50.59;

k. Records of meetings of the Unit 2/3 PORC, the NSAB, and the SORC;

l. Records of the service lives of all hydraulic and mechanical snubbers required by Technical Specifications 3.7.10 including the date at which the service life commences and associated installation and maintenance records;

m. Records of secondary water sampling and water quality; and

n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.

o. Records of reviews performed for changes made to the Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM) and the Process Control Program.

[1] Relocation of Technical Specification Administrative Controls Related to Quality Assurance in Response to AL 95-06.

APPENDIX G
TECHNICAL SPECIFICATION POSITION CROSS REFERENCE

MILLSTONE UNIT 2

T.S. SECTION	T.S. POSITION	STATION ORGANIZATION POSITION
Responsibility		
6.1.1	Designated Officer Designated Manager	Sr. Vice President and CNO - Millstone ***Master Process Owner- Operate the Asset***
Organization		
6.2.1b Offsite and onsite organizations	Designated Manager	***Master Process Owner- Operate the Asset***
6.2.1c Offsite and onsite organizations	Designated Officer	Sr. Vice President and CNO - Millstone
Facility Staff		
6.2.2	***SS - Shift Supervisor***	***Shift Manager***
Facility Staff Qualifications		
6.3.1a	***Operations Manager***	***Process Owner -Operations***
6.3.1c	***Health Physics Manager***	***Process Owner - Radiological Protection***
Procedures		
6.8.2a	Designated Manager Designated Officer Designated Senior Officer	***Master Process Owner- Operate the Asset*** Vice President - ***Generation or*** Sr. Vice President and CNO - Millstone
6.8.2b	Designated Manager Designated Officer	***Master Process Owner- Operate the Asset*** Vice President -***Generation*** or Sr. Vice President and CNO - Millstone
6.8.2c	Designated Manager Designated Officer	***Master Process Owner- Operate the Asset*** Vice President - ***Generation*** or Sr. Vice President and CNO - Millstone
6.8.2d	***Manager or Director***	***Process Owner or Master Process Owner***
6.8.3c	Designated Manager Designated Officer	***Master Process Owner- Operate the Asset*** Vice President - - ***Generation*** or Sr. Vice President and CNO - Millstone
6.8.5	***Individual from the Radiological Branch or Production Laboratory (POSL)***	***Individual from Nuclear Fuels and Safety Analysis or designee***

High Radiation Area		
6.12.1c	***Health Physics Manager***	***Process Owner - Radiological Protection***
Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM)		
6.15b	Designated Officer	Sr. Vice President and CNO - Millstone

Notes:

1. Generic position titles are as approved by Amendment No. 235 to the Unit 2 Technical Specifications.

MILLSTONE UNIT 3

T.S. SECTION	T.S. POSITION	STATION ORGANIZATION POSITION
Responsibility		
6.1.1	Designated Officer Designated Manager	Sr. Vice President and CNO - Millstone ***Master Process Owner- Operate the Asset***
Organization		
6.2.1b Offsite and onsite organizations	Designated Manager	***Master Process Owner- Operate the Asset***
6.2.1c Offsite and onsite organizations	Designated Officer	Sr. Vice President and CNO - Millstone
Procedures		
6.8.2a	Designated Manager Designated Officer Designated Senior Officer	***Master Process Owner- Operate the Asset*** Vice President - ***Generation*** Sr. Vice President and CNO - Millstone
6.8.2b	Designated Manager Designated Officer	***Master Process Owner- Operate the Asset*** Vice President - - ***Generation*** or Sr. Vice President and CNO - Millstone
6.8.2c	Designated Manager Designated Officer	***Master Process Owner- Operate the Asset*** Vice President - ***Generation*** or Sr. Vice President and CNO - Millstone
6.8.2d	***Manager or Director***	***Process Owner or Master Process Owner***
6.8.3c	Designated Manager Designated Officer	***Master Process Owner- Operate the Asset*** Vice President - ***Generation*** or Sr. Vice President and CNO - Millstone
6.8.5	***Individual from the Radiological Branch or Production Laboratory***	***Individual from Nuclear Fuels and Safety Analysis or designee***
High Radiation Area		
6.12.1c	***Health Physics Manager***	***Process Owner - Radiological Protection***
Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM)		
6.13b	Designated Officer	Sr. Vice President and CNO - Millstone

Notes:
Generic position titles are as approved by Amendment No. 171 to the Unit 3 Technical