

June 20, 2000

Mr. Merrill Atkins
Regulatory Affairs Manager
Yankee Atomic Electric Company
Midstate Office Park Suite 200/210
Auburn, MA 01501

SUBJECT: YANKEE NUCLEAR POWER STATION - QUALITY ASSURANCE PROGRAM
CHANGES (TAC NO. MA5032)

Dear Mr. Atkins:

By letters dated July 9, 1999, and August 31, 1999, Yankee Atomic Electric Company (YAEC) submitted a proposed revision to the quality assurance program description for the Yankee Nuclear Power Station. The change was submitted as a reduction in commitment under the provisions of 10 CFR 50.54(a)(3).

The proposed changes reflect organizational changes and program simplification based on the plant's decommissioned status and served notice of YAEC's intent to apply the Yankee Decommissioning Quality Assurance Program to Independent Spent Fuel Storage Installation activities per 10CFR 72.140(d).

The staff reviewed the proposed change, as documented in the enclosed safety evaluation, and found that the reduction in commitment will continue to satisfy the criteria of Appendix B to 10 CFR Part 50 and applicable administrative control requirements. The change is, therefore, acceptable.

If you have any further questions regarding this issue, please contact me at (301) 415-2972.

Sincerely,

/RA/

Phillip M. Ray, Project Manager
Decommissioning Section
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-29

Enclosure: Safety Evaluation

cc w/encl: See next page

June 20, 2000

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Regulatory Affairs Manager
Yankee Atomic Electric Company
Midstate Office Park Suite 200/210
Auburn, MA 01501

SUBJECT: YANKEE NUCLEAR POWER STATION - QUALITY ASSURANCE PROGRAM
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ACCESSION NUMBER: ML003725064 NRR=106 *No major changes made to SE.

OFFICE	PDIV-D/PM	PDIV-D/LA	*DIPM/IQMB	PDIV-D/SC
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DATE	5/9/00	5/9/00	01/21/00	24 May 00

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Yankee Nuclear Power Station

cc:

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
FOR PROPOSED REVISION 29 TO THE
YANKEE DECOMMISSIONING QUALITY ASSURANCE PROGRAM
YANKEE ATOMIC ELECTRIC COMPANY
YANKEE NUCLEAR POWER STATION
DOCKET NO. 50-29

1.0 INTRODUCTION

By letters dated July 9, 1999 (BYR 99-041), and August 31, 1999 (BYR-99-057), Yankee Atomic Electric Company (YAEC, the licensee) submitted a proposed Revision 29 to its Yankee Decommissioning Quality Assurance Program (YDQAP) for the Yankee Nuclear Power Station (YNPS). The change was submitted as a reduction in commitment under the provisions of 10 CFR 50.54(a)(3). The proposed changes reflect organizational changes and program simplification based on the plant's decommissioned status. The licensee also notified NRC of its intent to apply the YDQAP to Independent Spent Fuel Storage Installation activities per 10 CFR 72.140(d). This evaluation reviews the change for conformance to 10 CFR Part 50, Appendix B, and administrative control requirements. The licensee is committed to ANSI N18.7-1976, "Administrative Controls and Quality Assurance Requirements for the Operational Phase of Nuclear Power Plants," as conditionally endorsed by Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operation)," Revision 2.

2.0 BACKGROUND

YAEC announced the decision to permanently shut down the YNPS in 1992 and stated that the facility was going to be decommissioned. Subsequently, the licensee made many changes at the facility including removal of many major components. The licensee states that there are no safety-related structures, systems, or components (SSCs) at the facility.

Additionally, in separate letters (March 17, April 23, July 21, November 2, 1999, and March 6, 2000), YAEC requested approval of changes to the YNPS Defueled Technical Specifications (TS). The changes included elimination of the positions of Manager of Operations and Plant Superintendent and assignment of the applicable responsibilities to the YAEC Decommissioning Manager. Additionally, the TS changes replaced the review and audit functions performed by the Plant Operations Review Committee (PORC) and the Nuclear Safety Audit and Review Committee (NSARC) with an Independent Reviewers program and an Independent Review and Audit Committee (IRAC), respectively. The NRC will evaluate the TS

change request separately. However, the YDQAP change was assessed for consistency with the TS change request.

3.0 EVALUATION

3.1 Basis of Evaluation

Appendix B to 10 CFR Part 50, "Quality Assurance for Nuclear Power Plants and Fuel Reprocessing Plants," establishes quality assurance (QA) requirements for the design, fabrication, construction, and testing of nuclear power plant safety-related SSCs. Appendix B criteria are used in evaluating the adequacy of QA programs used by holders of licenses. ANSI N18.7 has been endorsed by RG 1.33 as providing methods acceptable for complying with the Commission's regulations regarding overall QA program requirements.

This evaluation was performed in accordance with the guidance of NUREG-0800, the "Standard Review Plan" (SRP), which provides a well-defined, uniform basis for evaluating proposed changes to license commitments. The acceptance criteria for evaluating changes to the licensee description of how the criteria are met are provided by SRP 17.1.

3.2 Proposed Change

The licensee's proposed changes include organizational changes; adding references to 10 CFR Part 72; making editorial changes; limiting the scope and descriptions of activities to reflect the plant's decommissioned status; making changes to adopt recent revisions to 10 CFR 50.54; recognizing the transfer of design work, procurement, and QA and control functions to a contractor; placing greater quality control responsibilities on the organizations performing work while maintaining requirements for QA audit and overview; and changing some of the requirements for control of measuring and test equipment from the plant to vendors.

3.2.1 Organization Changes

The licensee describes several organization changes. These changes included or recognized:

- References to the Nuclear Safety and Audit Committee (NSARC) are changed to the Independent Review and Audit Committee (IRAC).
- Reassignment of the duties of the Manager of Quality Assurance to the Decommissioning Manager of Quality Assurance.
- Reassignment of the duties of the Engineering Manager to the Decommissioning Manager.
- Reassignment of some of the duties of the Director of Quality Assurance to the Oversight Manager.
- Reassignment of some of the duties of the Director of Quality Assurance to the Decommissioning Quality Assurance Manager.

- Elimination of the functions and personnel that are no longer applicable in the decommissioned status. These positions include the Engineering Manager, Shift Supervisors, Licensing Manager, and others. Duties applicable to the decommissioned status were assigned to others including contractors.

The described organization changes, the reassignment of some duties, and elimination of positions and responsibilities that are not applicable to the decommissioned plant, are consistent with 10 CFR Part 50 Appendix B, and ANSI N18.7. The changes provide sufficient authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations. Therefore, the changes are acceptable.

3.2.2 Program Changes Based on the Plant's Decommissioned Status

In addition to organization and title changes described above, the licensee changed the description of the organization's responsibility and limited the responsibility to decommissioning and spent fuel storage. Additionally, the licensee reduced the scope of the SSCs to which the QA program was applicable. The licensee limited the scope to the important-to-safety components associated with spent fuel storage. The licensee stated that there were no safety-related SSCs at the facility due to the cessation of power operations. The licensee stated that the important-to-safety SSCs associated with 10 CFR Part 72 (onsite dry storage of spent fuel) would be subject to the QA program. Also, the licensee noted that the program remained applicable to radioactive waste packaging and transportation in accordance with 10 CFR Part 71.

Application of an approved Part 50 Appendix B QA program to Part 71 and Part 72 activities is authorized by those Parts and is, therefore, acceptable.

3.2.3 Editorial Changes

In conjunction with the above changes, the licensee made a number of editorial changes. Editorial changes are permitted by 10 CFR 50.54(a)(3) and do not require NRC approval. Therefore, the licensee's editorial changes are acceptable. The licensee also eliminated information that duplicates language in QA standards to which the licensee is committed. These changes are authorized by 10 CFR 50.54(a)(3)(v) and are, therefore, acceptable.

3.2.4 Changes to the Scope and Description of Activities

The licensee deleted reference to certain ANSI N45.2 series standards and a Regulatory Guide. Specifically deleted were ANSI N45.2.1-1973, "Cleaning of Fluid Systems and Associated Components During Construction Phase of Nuclear Power Plants"; ANSI N45.2.4-1972, "Installation, Inspection, and Testing Requirements for Instrumentation and Electric Equipment During the Construction of Nuclear Power Generation Plants"; ANSI N45.2.8-1975, "Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants"; and Regulatory Guide 1.29, Revision 3, "Seismic Design Classification." The deleted standards are applicable to construction activities, including construction activities during plant operations. These standards are not required for decommissioning activities. Therefore, deletion of these standards from the YDQAP is acceptable.

Additionally, the licensee redefined the QA program changes that required prior NRC approval. The licensee specified that previous NRC safety evaluations could be used to make changes that reduced QA commitments under the same conditions, without first obtaining NRC approval. NRC regulation 10 CFR 50.54(a)(3) states that "the following changes are not considered to be reductions in commitment: (ii) The use of a quality assurance alternative or exception approved by an NRC safety evaluation, provided that the bases of the NRC approval are applicable to the licensee's facility"; The licensee's change is consistent with 10 CFR 50.54(a)(3)(ii) and is, therefore, acceptable.

3.2.5 Use of Vendors to Perform Quality Activities

The licensee assigned responsibility for the performance of several quality-related activities to vendors. Activities included the performance of QA, engineering, procurement, site management, and control of measuring and test equipment.

The licensee's program describes sufficient control of the quality aspects of the vendors' activities through oversight and audits under the control of the IRAC as overseen by the YAEC president and Chief Executive Officer. The essential elements of 10 CFR Part 50 Appendix B were retained. Therefore, the licensee's changes are acceptable.

4.0 CONCLUSIONS

The proposed changes to the licensee's QA program as described above will continue to satisfy the criteria of Appendix B to 10 CFR Part 50 and applicable administrative control requirements. The changes are, therefore, acceptable.

Principal Contributor: P. Narbut

Date: June 20, 2000