

BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Ralph G. Bird

Senior Vice President — Nuclear

BECo 90-081

July 2 1990

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

License DPR-35
Docket 50-293

**ANNUAL REPORT OF CHANGES TO THE BOSTON EDISON
QUALITY ASSURANCE PROGRAM DESCRIPTION**

As required by 10CFR.54(a), Boston Edison submits the annual summary of changes made to the Boston Edison Quality Assurance Program Description as listed in the Boston Edison Quality Assurance Manual (BEQAM), Volume II.

We evaluated each change, summarized in Enclosure (A), to determine if any requirements contained in the previously NRC-approved QA Program Description were deleted or made less stringent. We concluded there were no reductions of commitments. 10CFR50, Appendix B, Criterion II requirements were used to conclude the revised program continues to satisfy the criteria of Appendix B.

R.G. Bird
R.G. Bird

GGW/jmm/4465

Enclosure: (A) Summary of the Boston Edison QA Program Description Changes
(1989-1990)

cc: Mr. R. Eaton, Project Manager
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation
Mail Stop: 14D1
U. S. Nuclear Regulatory Commission
1 White Flint North
11555 Rockville Pike
Rockville, MD 20852

U. S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Senior NRC Resident Inspector
Pilgrim Nuclear Power Station

9007100253 900702
PDR ADCK 05000293
R PDC

Q004
11

SUMMARY OF THE BOSTON EDISON
QA PROGRAM DESCRIPTION CHANGES
(1989-1990)

QA PROGRAM CHANGE #II-222
EVALUATION #89-02

Void; no change was made to the BEQAM.

QA PROGRAM CHANGE #II-223
EVALUATION #89-03

This change modifies Section 2 of BEQAM II as follows:

To reflect title/organizational changes (i.e., Vice President, Nuclear Engineering is now entitled Director of Nuclear Engineering and the Radwaste Section Manager is now the Radwaste and Chemistry Section Manager).

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-224
EVALUATION #89-04

Void; no change was made to the BEQAM.

QA PROGRAM CHANGE #II-225
EVALUATION #89-05

This change modifies Section 15 of BEQAM II as follows:

To clarify existing requirements, add controls and enhance the program for handling nonconforming items. This change also emphasizes how installed nonconforming items are controlled. Prior to this change, the BEQAM implies that a system containing an installed nonconforming item may not be declared operable. This is misleading because if the nonconforming item is redundant, the system may be declared operable according to the Technical Specifications. However, in all cases, the nonconforming item itself may not be declared operable.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-226
EVALUATION #89-06

Void; no change was made to the BEQAM.

QA PROGRAM CHANGE #II-227
EVALUATION #89-07

This change modifies Section 18 of BEQAM II as follows:

To modify the process for handling Quality Assurance internal auditing recommendations, for improving QA Program related activities and/or physical plant conditions.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-228
EVALUATION #89-08

This change modifies Section 16 of BEQAM II as follows:

To remove the term "recurring condition" and provide direction and clarification on this issue. Recurring conditions are not necessarily significant; likewise, some specific occurrences are significant. This change also reflects appropriate organizational changes.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-229
EVALUATION #89-09

This change modifies Section 3 of BEQAM II as follows:

To clarify that design changes are implemented by the Station Organization with technical guidance from Nuclear Engineering.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-230
EVALUATION #89-10

Void; no change was made to the BEQAM.

QA PROGRAM CHANGE #II-231
EVALUATION #89-11

This change modifies Section 7 of BEQAM II as follows:

To add requirements for auditing of suppliers to Section 7 and remove it from Section 18.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-232
EVALUATION #89-12

This change modifies Section 18 of BEQAM II as follows:

To remove requirements for auditing of suppliers from Section 18 and add it to Section 7.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-233
EVALUATION #89-13

This change modifies Section 4 of BEQAM II as follows:

To provide a definition for preliminary procurement documents and to clarify the process for handling supplier generated deviation requests to Boston Edison purchase orders. This change also notes that the potential "Commercial Quality Items" list has been removed from the Q list manual.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-234
EVALUATION #89-14

This change modifies Section 7 of BEQAM II as follows:

To allow an item to be released from the warehouse for special testing; control will be maintained with a conditional release tag.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-235
EVALUATION #89-15

This change modifies Section 7 of BEQAM II as follows:

To identify material purchased with a "UL" or "FM" stamp as a fire protection item after receipt inspection and/or testing.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-236
EVALUATION #89-16

This change modifies Section 10 of BEQAM II as follows:

- To clarify that personnel are "certified" as well as qualified to perform installation inspections.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-237
EVALUATION #89-17

This change modifies Section 7 of BEQAM II as follows:

To clarify that verification of corrective action to Supplier Finding Reports should be verified within 30 days but shall not exceed the next audit or source inspection. This change also allows the option of reporting Supplier Finding Report status to higher levels of management.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-238
EVALUATION #89-18

This change modifies Section 2 of BEQAM II as follows:

To reflect appropriate title changes (i.e., Director of Nuclear Engineering is now entitled Vice President Nuclear Engineering and the Station Director, Vice President Nuclear Operations/Station Director).

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-239
EVALUATION #89-19

This change modifies Section 16 of BEQAM II as follows:

To clarify the definition of "significant condition adverse to quality" by changing ". . . to prevent a safety related item from performing its intended function" to ". . . potential to seriously affect nuclear safety" which is a more encompassing requirement.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-240
EVALUATION #90-01

This change modifies Section 4 of BEQAM II as follows:

To expand the commercial grade dedication program to reflect the guidelines specified in EPRI NP-5652, "Guideline for the Processing of Commercial Grade Items." This change also proceduralizes QA reviews and requirements for procurement which had previously and are currently being performed.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-241
EVALUATION #90-02

This change modifies Section 7 of BEQAM II as follows:

To expand the commercial grade dedication program to reflect the guidelines specified in EPRI NP-5652, "Guideline for the Processing of Commercial Grade Items." This change also proceduralizes QA reviews and requirements for procurement which had previously and are currently being performed.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-242
EVALUATION #90-03

This change modifies Section 5 of BEQAM II as follows:

To require Pilgrim Nuclear Power Station (PNPS) procedures to be reviewed and approved by the Operations Review Committee (ORC) unless they designate a procedure as "ORC review not required" or it is a minor revision as defined in PNPS procedures. The ORC shall review and approve any major revision, including procedures previously designated "ORC review not required" to determine if the change affects this status.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.

QA PROGRAM CHANGE #II-243
EVALUATION #90-04

This change modifies Section 1 of BEQAM II as follows:

To clarify work process changes due to organizational changes. All requirements remain the same, responsibilities differ.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report Quality Assurance Program description commitments previously accepted by the NRC.