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Docket No. 50-461

10CFR50.54(a)(3)

Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subject: Proposed Changes to the Clinton Power Station Quality Assurance Program

Dear Sir:

Based on improvements in various program processes and the experience of Clinton Power Station (CPS) personnel, Illinois Power (IP) has concluded that certain quality assurance functions can be performed effectively without in-line Nuclear Assessment (NA) department (previously known as the Quality Assurance department) involvement. As a result, IP proposes to change several activities described in the current IP Nuclear Program Quality Assurance Manual. These changes include: inspection planning; in-line review of procurement documents, procedures, Maintenance Work Request (MWR) packages and Condition Reports (CRs); periodicity of the NA department audit; and receipt inspection. In accordance with the provisions of 10CFR50.54(a)(3), IP intends to implement these changes within 60 days of the date of this letter. In addition, IP has consolidated Non-Destructive Examination (NDE) responsibilities and has reassigned the Independent Safety Engineering Group (ISEG) to the Nuclear Assessment department. All of the above changes and several other minor changes were discussed with members of NRC Region III staff at a meeting in the Region III office on June 15, 1993. The details of and reasons for the proposed changes are described in Attachment 1 of this letter. The proposed revision 24 of the quality assurance manual, the 10CFR50.59 safety evaluation, the 10CFR50.54(a) evaluation and the matrix of changes which lists all changes made are also enclosed with this letter.

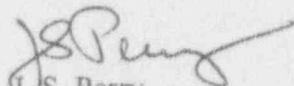
This letter is submitted to request approval of the changes in inspection planning, the NA department audit periodicity, receipt inspection, and the in-line review of procurement documents, procedures, MWRs and CRs and to identify the consolidation of NDE responsibilities and the reassignment of ISEG resources. As a result of these changes, activities described in the current IP Nuclear Program Quality Assurance Manual will be revised as described in the matrix of changes and proposed revision 24 of the manual. The intent of the current planning and oversight activities, however, will continue to be fulfilled,

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thereby assuring the current level of quality is maintained. These changes are justifiable as the quality assurance program will continue to satisfy the requirements of 10CFR50 Appendix B, and Reg Guide 1.33/ANSI N18.7 (1976) as described in USAR Section 1.8.

Sincerely yours,


J.S. Perry
Senior Vice President

RSF/nls

Attachment/enclosures

cc: NRC Clinton Licensing Project Manager
Regional Administrator, Region III, USNRC
NRC Resident Office, V-690
Illinois Department of Nuclear Safety

Quality Assurance Program Changes

Inspection Planning

Presently, as part of the processing of a new maintenance item, Nuclear Assessment department personnel determine what quality verification inspections, such as hold and witness points, are planned into Maintenance Work Request (MWR) and Preventive Maintenance packages. The guidance for determining these inspections exists in site procedures. Maintenance planners within the Plant Maintenance department determine all other details and documents that make up the MWR package with input from the Nuclear Station Engineering department (NSED).

Illinois Power proposes to consolidate the inspection planning function into the work planning function performed by the maintenance planners within the Plant Maintenance department. Nuclear Assessment department personnel will perform the inspections that the planners specify in the work packages. Individual inspectors will continue to have the freedom to expand the scope of the inspection as appropriate. Additionally, the Nuclear Assessment department will maintain independent oversight through performance-based surveillances and audits of maintenance activities.

Maintenance planners are independent of maintenance production supervision and currently perform inspection planning that is reviewed by the Nuclear Assessment department. Maintenance planners currently assign "critical points" which specify points in the job sequence that require maintenance supervision oversight. Assigning critical points is a process similar to inspection planning. The detailed task knowledge of the maintenance planners and the empowerment of the inspectors to conduct performance-based inspections will enhance the overall inspection process. Chapter 1 of the IP Nuclear Program Quality Assurance Manual will be revised to describe this change as detailed in the enclosed matrix of changes and draft revision 24 of the manual.

Procurement Document Review

Presently, Nuclear Assessment department personnel review purchase requisitions and the corresponding purchase orders for quality-related procurements to confirm that quality assurance requirements are appropriate for the item ordered. The current quality assurance program and its implementing procedures require NSED to specify appropriate quality assurance requirements and product acceptance criteria. Technical requirements for procurement requisitions for quality related purchases are specified by an NSED preparer and reviewed by a second NSED individual. The procurement requisitions are converted to purchase orders and approved by the Purchasing and Material Control department. The NA department reviews have been primarily qualitative in nature, e.g., verifying that quality assurance requirements including receipt inspection criteria are consistent with the item being procured, that suppliers are selected from the Qualified Suppliers List and that specific requirements of the purchase requisitions are accurately translated into the purchase orders.

Personnel in NSED and the Purchasing and Material Control department are properly trained and qualified, and are accountable for establishing the appropriate quality assurance requirements for purchased items and ensuring accurate translation of technical and quality requirements into purchase orders. Illinois Power proposes to leave the responsibility for procurement document reviews with NSED and the Purchasing and Material Control department personnel and replace the in-line Nuclear Assessment department review of these documents with performance-based surveillances and audits of related activities. This change enhances the overall quality program by emphasizing individual performance, with appropriate Nuclear Assessment department oversight. Chapter 4 of the IP Nuclear Program Quality Assurance Manual will be revised to describe this change as detailed in the enclosed matrix of changes and draft revision 24 of the manual.

Procedure Reviews

Nuclear Assessment department personnel presently review new and selected revised procedures as part of the approval process. These procedures include those for tests, special tests, Technical Specification surveillances and procedures that specify repair or rework activities. Nuclear Assessment department personnel also review changes to the Updated Safety Analysis Report (USAR) and Corporate Nuclear Procedures (CNP's). The purpose of these Nuclear Assessment department reviews is to assure effectiveness of the programs associated with these documents. The Nuclear Assessment department reviews have been primarily qualitative in nature, e.g., verifying that program requirements have been met and that the document is administratively correct. It is Illinois Power's philosophy that quality is achieved through personnel knowledge and motivation to perform the work correctly, backed by independent review and performance-based evaluation of overall execution. Illinois Power personnel responsible for developing and maintaining these documents are producing high quality documents, as demonstrated by the low number and the insignificance of deficiencies identified by the existing Nuclear Assessment department in-line reviews.

Illinois Power proposes to establish performance-based surveillances of the activities associated with the different documents in lieu of the in-line document review process. Illinois Power's experience has shown that performance-based surveillances and audits are better methods for evaluating effectiveness than document reviews, and these surveillances tend to identify more significant problems as well as performance weaknesses.

These changes will enhance the ability of the Nuclear Assessment department to verify that quality-related activities are effectively executed and ensure sufficient oversight of documents to maintain quality program requirements. Chapters 1, 2, 5, and 11 of the IP Nuclear Program Quality Assurance Manual will be revised to describe these changes as detailed in the enclosed matrix of changes and draft revision 24 of the manual.

Maintenance Work Request and Condition Report Reviews

Nuclear Assessment department personnel presently perform in-line review of MWRs during the initiation process, and MWRs and CRs during the close-out process. These reviews are generally performed to fulfill the NA department responsibility of assuring these programs are effective and to assure nonconforming material conditions receive appropriate dispositions. Illinois Power personnel responsible for creating these documents have been producing high quality documents, as demonstrated by the low number and the insignificance of deficiencies identified by the existing in-line reviews. Illinois Power proposes to replace these in-line reviews with performance-based surveillances of maintenance activities (for MWRs) and corrective actions (for CRs). Performance-based oversight enhances the ability of the Nuclear Assessment department to assure the effectiveness of maintenance/modification processes and CR corrective action implementation. Additionally, Illinois Power will continue independent oversight through performance-based audits of maintenance activities.

Chapters 1, 2, 3 and 15 of the IP Nuclear Program Quality Assurance Manual will be revised to describe these program changes as detailed in the enclosed matrix of changes and draft revision 24 of the manual.

Nuclear Assessment Department Audit

Currently, the audit of the Nuclear Assessment department quality assurance functions is performed on an annual basis. The annual periodicity of this audit is a holdover from construction and more frequent than the twenty-four month periodicity recommended by ANSI N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," and endorsed by Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)."

Illinois Power proposes to change the periodicity of the audit of the Nuclear Assessment department quality assurance functions to twenty-four months to be consistent with ANSI N18.7 and CPS Technical Specification 6.5.2.8.d requirements. Technical Specification 6.5.2.8.d requires that audits of activities required by the quality assurance program to meet 10CFR50 Appendix B criteria be performed at least once every twenty-four months.

Chapters 1 and 18 of the IP Nuclear Program Quality Assurance Manual will be revised to incorporate this change in audit periodicity.

Receipt Inspection

Presently, receipt inspections are performed by trained and certified receipt inspectors reporting to the Nuclear Assessment department. These personnel also perform many of the tests and inspections necessary to dedicate commercial grade items for use in safety-related applications.

Illinois Power's philosophy is that these inspection and testing functions could be effectively performed by another organization as part of a consolidation of procurement-related functions. Therefore, the receipt inspection function and the commercial grade dedication test and inspection functions currently performed by the NA department receipt inspectors may be transferred to another department in the future. Pursuant to any transfer of the receipt inspection function, the Nuclear Assessment department will maintain independent oversight of receipt inspection activities during performance-based surveillances and audits.

To allow the flexibility to transfer the receipt inspection responsibility from the Nuclear Assessment department to another organization, Chapters 1, 7, 10, and 14 of the IP Nuclear Program Quality Assurance Manual will be revised to indicate that receipt inspections will be performed by certified receipt inspectors without reference to a specific department being responsible for that activity.

Non-Destructive Examination

Previously, Non-Destructive Examination (NDE) personnel reported to the Supervisor - Quality Engineering and Verification in the NA department and additional qualified NDE resources were available in the In-Service Inspection (ISI) section of NSED. These NDE resources have been consolidated into the Nuclear Station Engineering department reporting to the Supervisor - ISI.

This change has enhanced the overall quality of the NDE program by having a single line of management for the total NDE function. The Nuclear Assessment department has retained some NDE expertise and will conduct independent oversight of NDE activities during performance-based surveillances and audits of the NDE process.

Chapters 2, 9 and 10 of the IP Nuclear Program Quality Assurance Manual will be revised to incorporate this organizational change as detailed in the enclosed matrix of changes and draft revision 24 of the manual.

Independent Safety Engineering Group

Previously, the Independent Safety Engineering Group (ISEG) reported to the Supervisor - ISEG within the Licensing and Safety department. A reorganization has placed the ISEG in the Nuclear Assessment department reporting to the Supervisor - ISEG. Additionally, the Engineering Assurance group which was previously part of NSED now reports to the Supervisor - ISEG. This change enhances the expertise of the Nuclear Assessment department in the area of engineering and technical support. It also consolidates oversight functions under the Manager of Nuclear Assessment while maintaining ISEG independence. The Manager - Nuclear Assessment ensures that ISEG functions are maintained separate and independent from quality assurance functions but with appropriate interface.

Chapters 1 and 18 of the IP Nuclear Program Quality Assurance Manual will be revised to incorporate this organizational change as detailed in the enclosed matrix of changes and draft revision 24 of the manual.

IP NUCLEAR PROGRAM QA MANUAL
Revision 24 Matrix of Changes

Entire Manual

Page	Para.	Change/Reason For Change
All	All	Added Centralized Commitment Tracking Numbers(CCT-XXXXX) directly after the applicable sentence or paragraph for identification of prior commitments to manual content.
All	NA	Removed the dates at the bottom of each page. A decision was made during the processing of revision 23 not to allow individual page/chapter changes. Since any change will now require revision of the entire manual revision dates on each page are not necessary, manual simplification.
First Page of each Chapter	NA	Removed the approved by: Manager-Nuclear Assessment block as individual chapter revisions are no longer allowed, manual simplification.
All	NA	Changed Quality Assurance Department, Manager, and personnel references to Nuclear Assessment Department, Manager and personnel. Due to a recent organizational change.
All	NA	Changed Nuclear Planning and Support Department, Manager, and personnel references to Nuclear Support Services Department, Manager, and personnel. Due to a recent organizational change.
All	NA	Changed Licensing and Safety Department, Manager and personnel references to Licensing Department, Director and personnel. Due to a recent organizational change.
All	NA	Changed "Department Manager" references to "Department heads", organizational change.

IP NUCLEAR PROGRAM QA MANUAL
Revision 24 Matrix of Changes

Table of Contents

Page	Para.	Change/Reason For Change
i	NA	Removed List of Effective Pages. The entire manual was changed to Revision 23 during the last annual update which will require full manual revisions in lieu of chapter revisions in the future which eliminates the need for a list of effective pages.
i	NA	Changed Appendix "A" to Glossary of Terms and deleted old Appendix "A" that addressed revisions to the Quality Assurance Manual which is covered in Chapter 2 and by implementing procedure QAP 102.02.

IP NUCLEAR PROGRAM QA MANUAL
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Introduction

Page	Para.	Change/Reason For Change
11	4 & 6	Corrected description/reference to Appendix "A" and added an explanation of the Centralized Commitment Tracking numbers placed in the Quality Assurance Manual. Appendix "A" was changed from a description of how to make revisions to the Illinois Power Nuclear Program Quality Assurance Manual to a Glossary of Terms. Revisions to the manual are addressed in Chapter 2 and Implementing Procedure QAP 102.02.

IP NUCLEAR PROGRAM QA MANUAL
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Authorization

Page	Para.	Change/Reason For Change
iii	1	Removed sentence "It is emphasized that the portion of the program assigned to the Quality Assurance organization primarily concerns verification activities, such as inspection, auditing, surveillance, evaluating and reporting effectiveness, and providing recommended solutions to noted problems." to emphasize that the major portion of the Quality Assurance Program is carried out by IP departments other than Nuclear Assessment. The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity. Also changed "Department Manager" to "department head". The Licensing Department is managed by a director.
iii	Approval Signature Line	Added "/Date" to signature line to indicate revision date which is no longer listed at the bottom of each page or the first page of each chapter.

IP NUCLEAR PROGRAM QA MANUAL
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Chapter 1

Page	Para.	Change/Reason For Change
1 of 7	1.1	Removed words "the establishment of" to take credit for the prior establishment of the organization.
1 of 7	1.2.1(3)	<p>Changed: "Each CNP is reviewed and concurred with by the Manager-Quality Assurance for QA program requirements."</p> <p>to: "Each CNP is reviewed and concurred with by responsible department management for incorporation of quality assurance program requirements." to remove the Nuclear Assessment department from in-line document reviews. In-line responsibility remains with the responsible department with Nuclear Assessment oversight through Nuclear Assessment department management review and concurrence.</p>
2 of 7	1.2.1(4)	<p>Changed: "The organizational structure and functional responsibility assignments are such that: (1) attainment of quality objectives is by individuals assigned responsibility for specifying quality or performing work to specifications; (2) verification of conformance to established quality requirements is by those who do not have direct responsibility for specifying, producing, or expediting products; and (3) personnel in key quality assurance functions have direct access to responsible management."</p> <p>to: "The organizational structure and functional responsibility assignments are such that: (1) attainment of quality objectives is by individuals assigned responsibility for specifying quality requirements or performing work to specifications; (CCT 8196) and (2) personnel performing the quality assurance functions of verification, surveillance and audits have direct access to responsible management and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations."</p> <p>This provides wording more consistent with 10CFR50 Appendix B.</p>

IP NUCLEAR PROGRAM QA MANUAL
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Chapter 1

Page	Para.	Change/Reason For Change
2 of 7	1.2.1(5)	<p>Changed: "Specific Quality Assurance activities (job duties and responsibilities) have been identified for each section within the QA department and are based on the amount and type of activities conducted. Staffing levels are established so that the work can be accomplished in a manner supportive of plant operations and outages. Further, once a year the QA department manning levels are reassessed and personnel levels are revised as necessary to assure adequate and timely coverage of QA activities. This review permits recruiting and training activities to be carried out in such a manner as to provide trained Quality Assurance personnel necessary to assure the quality of the work. Quality Assurance personnel are free from non-QA duties and provide full attention to assuring the effective implementation of the QA program. Effectiveness of the program is assured by Quality Assurance department participation in the work planning, through surveillance and audits, by the authority of Quality Assurance personnel to stop specific work activities where it appears that quality may be jeopardized, and the authority of the Manager - Quality Assurance to initiate a Stop Work Action."</p> <p>to: "Activities affecting safety related functions (job duties and responsibilities) have been identified. (CCT 8309) Effectiveness of the program is assured through verifications, surveillances, audits and by the authority of individuals performing these activities to stop specific work activities where it appears that quality may be jeopardized, and the authority of the Manager - Nuclear Assessment to initiate a Stop Work Action. (CCT 8192)"</p> <p>This clarifies that the Quality Assurance Program is also implemented by personnel outside of the Nuclear Assessment Department with Nuclear Assessment Department oversight through various means to assure effectiveness. Other editorial changes made for clarification and simplification.</p>

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Chapter 1

Page	Para.	Change/Reason For Change
2 of 7	1.2.1(6)	<p>Changed: "Inspectors are provided with approved inspection procedures and instructions prior to performing inspection operations. (During plant operations emergencies, inspections may be performed without written procedures.) To further assure that inspections are done in a timely manner, the QA organization identifies specific inspection points in the work documents and makes provisions for notification of verification/inspection witness, and hold points. In addition, designated QA personnel regularly attend and participate in planning, scheduling and status meetings during testing, operations and outages to assure (1) they are kept abreast of day-to-day projected work assignments throughout the plant and (2) that the necessary QA inspection controls, acceptance criteria, procedural controls and qualified QA staffing is available to properly carry out the assigned tasks."</p> <p>to: "Inspection personnel are provided with procedures and instructions prior to performing inspection operations. (During plant operations emergencies, inspections may be performed without written procedures.) (CCT 8304) To further assure that inspections are done in a timely manner, specific inspection points are identified in work documents with provisions for notification of inspection/witness, and hold points. (CCT 8305)"</p> <p>Allows inspection planning responsibility to exist outside the Nuclear Assessment department with the Nuclear Assessment department retaining oversight responsibility. Other editorial changes made for clarification and simplification.</p>
2 of 7	1.2.2	<p>Removed reference to Figure 1-1 for the organizational structure. To eliminate unnecessary duplication of the description of the organizational structure. Also made two minor editorial changes, removing the word "individual" in the sentence which describes the purpose of the section and changing "within IP" to "at Clinton Power Station".</p>
2 of 7	1.2.2.1	<p>Changed "Chairman, President and Chief Executive Officer of IP" to Executive Vice President - Energy Supply" to reflect a recent reorganization.</p>

IP NUCLEAR PROGRAM QA MANUAL
Revision 24 Matrix of Changes

Chapter 1

Page	Para.	Change/Reason For Change
2 of 7	1.2.2.1	Changed "Vice President" to "Senior Vice President" to correct title.
3 of 7	1.2.2.2	<p>Changed: "The Senior Vice President is responsible for the overall effectiveness of the Quality Assurance Program and is responsible for establishing the quality assurance policies, goals and objectives, as well as testing, maintenance, operations, nuclear support, and engineering. The Senior Vice President is also responsible for assuring that annual management reviews are conducted and documented on the status, adequacy and effectiveness of the overall QA program. The Senior Vice President is responsible for assuring that the authority and independence of Quality Assurance personnel are such that they can effectively assure the conformance to quality requirements and are independent of undue influences and responsibilities for schedule and costs."</p> <p>to: "The Senior Vice President is responsible for the overall effectiveness of the Quality Assurance Program and for assuring oversight of the quality assurance program for effectiveness. The Senior Vice President is responsible for assuring that the authority and independence of personnel performing quality assurance functions are such that they can effectively assure the conformance to quality requirements and are sufficiently independent from cost and scheduling when opposed to safety considerations."</p> <p>This provides management flexibility in oversight of the Quality Assurance Program consistent with Regulatory Guide 1.33 and ANSI N18.7 and recognizes that some quality assurance program activities are performed by personnel not in the Nuclear Assessment department. New wording is consistent with 10CFR50 Appendix 'B'. Removed unnecessary detail for simplification.</p>
3 of 7	1.2.2.4	Removed specific responsibilities covered in other sections of the manual, for Quality Assurance Manual simplification.

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Chapter 1

Page	Para.	Change/Reason For Change
3 of 7	1.2.2.5	Removed "The Manager - Nuclear Planning and Support is responsible for controlling the Nuclear Program procedures governing the procurement activities." Removed specific responsibilities for planning and executive plans, resource management, medical services, nuclear program staffing and change department name to Nuclear Support Services. Wording eliminates unnecessary detail in the program manual and reflects recent organizational change. Changed "integrated" to "integration", editorial
4 of 7	1.2.2.8	Added responsibility for the Manager Nuclear Training to manage the Emergency Preparedness Program. Recent organizational change. Removed detailed description of duties to eliminate unnecessary detail from the Quality Assurance Manual.
4 of 7	1.2.2.9	Removed qualifications of the Manager-Nuclear Assessment, covered in the Updated Safety Analysis Report and detail description of the Nuclear Quality Assurance Program. To remove unnecessary detail from the Quality Assurance Manual. Added words to address that the ISEG reports to the Manager-Nuclear Assessment and to emphasize their independence from the Quality Assurance function. Also other minor editorial changes for clarity.
4 of 7	1.2.2.9.1	Removed Director-Nuclear Assessment responsibilities to reduce unnecessary detail in the Quality Assurance Manual and limit responsibility discussion to department head.
4 of 7	1.2.2.10	Spelled out meaning of abbreviation USAR. Also removed the responsibility for ISEG activities. Changed "Manager-Licensing and Safety" to "Director-Licensing" and removed the responsibility for management of the Emergency Preparedness Program. To reflect recent organizational changes. Removed unnecessary details in the description of Director Licensing responsibilities.
5 of 7	1.2.2.11	Removed some responsibility details for simplification of the Quality Assurance Manual and made a minor editorial change.

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Chapter 1

Page	Para.	Change/Reason For Change
5 of 7	1.2.3	Removed reference to organizational structure (Figure 1-2). (CCT-8201)
5 of 7	1.2.3	Removed responsibility: "Review Quality-related procurement requisitions and, as specified, Condition Reports, procedures, instructions and other Quality-related documents." (CCT-8182) Removed Nuclear Assessment from in-line document reviews leaving responsibility with line management, with Nuclear Assessment performing performance based assessment to determine program effectiveness. Also other minor editorial changes.
5 of 7	1.2.3	Removed responsibility to review all changes to the USAR. (CCT-8316) Remove Nuclear Assessment from in-line document reviews leaving responsibility with line management with Nuclear Assessment responsible for assuring effectiveness through oversight.
5 of 7	1.2.3	Removed reference to responsibility for trend analysis to eliminate unnecessary detail from the Quality Assurance Manual, trend analysis is discussed in chapter 16.
6 of 7	1.2.3(f)	Removed the words "develop and" to take credit for the audit, surveillance and inspection programs which have already been developed. Other editorial changes made for clarity. Changed QA to Quality Assurance.
6 of 7	1.2.3.(h)	Changed "QA" to "Quality Assurance"; editorial.
6 of 7	1.2.3(i)	Changed "QA Management" to "management"; editorial.
6 of 7	1.2.3.1	Removed Quality Engineering and Verification section description. Remove unnecessary detail from QAM. (CCT-8223)
6 of 7	1.2.3.3	Removed Quality Systems section description. Remove unnecessary detail from the QAM. (CCTs-8321, 8322 and 8324)
6 of 7	1.2.3.4	Removed Audit Section description. Remove unnecessary detail from the QAM. (CCTs-8325, 8326 and 8327)

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Chapter 1

Page	Para.	Change/Reason For Change
6 of 7	1.2.3.5	Removed Program Monitoring Section description. Remove unnecessary detail from the QAM.
6 of 7	1.2.4(1)	<p>Changed: "Activities affecting the quality of safety-related systems, structures and components are performed by or under the cognizance of various IP organizations. Other sections of QA may perform some of the functions of another QA section provided that personnel are adequately trained, qualified/ certified and these work activities are performed to the same (or similar) procedure and instructions."</p> <p>to: "Activities affecting the quality of safety-related systems, structures and components are considered quality assurance program activities and are performed by, or under the cognizance of various IP organizations. Any department may perform these quality assurance activities provided that personnel are adequately trained, qualified/certified, have the required authority and organizational freedom, and these work activities are performed in accordance with approved procedures and instructions." (CCT-39591)</p> <p>Recognize that Quality Assurance functions can be performed by personnel other than those in the Nuclear Assessment department.</p>
6 of 7	1.2.4(1)	Removed "between members of these organizations" and changed "Chairman and CEO." to "Executive Vice President - Energy Supply" (CCT-8618) Remove limitations on types of disagreements or disputes to be brought to management's attention.
7 of 7	1.2.4(2)	Removed "and quality assurance with the Quality Assurance Department" when referring to responsibilities to ensure that it is understood that other departments are responsible for Quality as well as the Nuclear Assessment Department.
NA	1.2.5	Removed nuclear program organization charts. QA Manual simplification.

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Chapter 2

Page	Para.	Change/Reason For Change
1 of 5	2.2	Changed "package" to "packaging"; editorial.
1 of 5	2.2.1	Changed "Quality Assurance" to "Quality assurance" to clarify description of the program.
2 of 5	2.2.2	Changed Quality Assurance program "implementation" to "revisions". Also removed the first paragraph explaining the past implementation and statement that the program is fully implemented. Removed reference to Appendix A in the description of QA Manual revisions. Changed words describing when a change should be submitted to the NRC for approval to more accurately describe requirements. Also removed unnecessary detail describing the change submittal process for Quality Assurance Manual simplification.
2 of 5	2.2.3.a.	Replaced reference to "Nuclear Policy Statements" with the words "Policy Documents" to remove unnecessary detail from the Quality Assurance Manual for simplification.
3 of 5	2.2.3.b.2	Changed responsibility for reviewing CNPs from Manager-Nuclear Assessment to responsible department management. (CCT-40847) Remove Nuclear Assessment from in-line reviews and leave responsibility with responsible management.
3 of 5	2.2.3.c	Removed reference to Table 2-1, (CCT-8340) because Table 2-1 was removed from the manual.
3 of 5	2.2.3.c	Replaced "Corporate Nuclear Procedures and the IP Nuclear Program Quality Assurance Manual." with "The upper tier documents listed in section 2.2.3 a&b above." To include Policy Documents, Records Management Standards and ISI Manual to list of upper tier documents implemented by department procedures and instructions.
3 of 5	2.2.4	Changed "Manager or Director" to "department head" in the description of who is responsible for proper qualification of personnel, for manual simplification.
4 of 5	2.2.5 (1)	Changed "Regular management reviews..." to "Regular reviews..."; editorial.

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Chapter 2

Page	Para.	Change/Reason For Change
4 of 5	2.2.5 (1)	<p>Changed: "This review function consists of meetings with key QA personnel, as well as review of QA department audit and status reports, and the performance of a IP Nuclear QA Program assessment, which is preplanned and documented. Corrective action required as a result of adverse conditions identified during the assessment are documented, tracked, and completion is verified and documented by IP Quality Assurance."</p> <p>to: "This review function consists of meetings with key Nuclear Assessment personnel, as well as review of audits and reports, and the performance of an IP Nuclear Quality Assurance Program assessment, which is preplanned and documented. Corrective action required as a result of adverse conditions identified during the assessment are documented, tracked, and completion is verified and documented. (CCT 8342)"</p> <p>To provide for organizational freedom for responsible departments to document, track and verify completion of corrective actions. Also minor editorial changes for clarity.</p>
4 of 5	2.2.5 (2)	<p>Added "or authorized agent" to the sentence stating who audits suppliers' quality assurance programs and removed "in activities", editorial.</p>
4 of 5	2.3.2	<p>Added item c. Maintain procedures/instructions to the extent necessary to carry out activities affecting quality. To ensure responsibility for adequate procedures rests with the responsible department.</p>
5 of 5	2.3.4	<p>Removed specific Nuclear Station Engineering responsibilities covered in over chapters of the manual and added overall responsibility "a. Implement the design control program for CPS, including design interface control activities." Quality Assurance Manual simplification.</p>
5 of 5	2.3.5.a	<p>Removed "Establish," from Nuclear Training's responsibility to maintain and implement a Licensed Operator Training program and a General Employee Training program. Added Maintenance and Technical Training program. Take credit for the established training program.</p>

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Chapter 2

Page	Para.	Change/Reason For Change
5 of 5	2.3.6	Removed specific Nuclear Assessment responsibilities covered in other chapters in the manual for manual simplification.
5 of 5	2.3.6	Removed Nuclear Assessment responsibility "Review all changes to the USAR, with the exception of Chapter 16, Technical Specifications." To remove Nuclear Assessment from the in-line review process.
5 of 5	2.3.6	Added Nuclear Assessment responsibilities: <ul style="list-style-type: none"> a. Perform activities to ensure the established quality assurance program meets requirements and is effectively executed. b. Identify quality problems and assure corrective actions are effective.
5 of 5	Table 2-1	Removed Table 2-1 for manual simplification and eliminate confusion about the degree of applicability indicated in the table.

IP NUCLEAR PROGRAM QA MANUAL
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Chapter 3

Page	Para.	Change/Reason For Change
1 of 5	3.2(2)	Editorial change to correct grammar and spacing.
3 of 5	3.2(5)d.	Removed "release" and "distribution" from the list of activities performed by each organization in relation to drawings specifications, data sheets, etc. These activities are performed by the Document Control Group."
4 of 5	3.2(8)	Changed "operations" to "operation", editorial.
4 of 5	3.2(9)	Changed "The" to "These", editorial.
4 of 5	3.2(10)	<p>Changed: "When a verification test cannot be performed prior to installation, proposed testing programs shall be reviewed and approved by Illinois Power to ensure that the program is conducted within licensing limitations prior to the point when the installation would become irreversible, and that no unresolved safety questions are involved."</p> <p>to: "When a verification test cannot be performed prior to installation, proposed testing programs shall be reviewed and approved by Illinois Power to ensure that no unresolved safety questions are involved and the testing is conducted within licensing limitations prior to the point when the installation would become irreversible."</p> <p>Editorial.</p>
4 of 5	3.2 (11)	Removed responsibility assignment from this description section and added surveillances to the methods used to ensure design activities are implemented in accordance with program requirements. Editorial.
4 of 5	3.3.2.a	Removed "Develop and" from Nuclear Station Engineering responsibility to implement the design control program for CPS, including design interface control activities. To take credit for the design control program that has been developed.
5 of 5	3.3.2.f	Removed "in the central file" from the end of this section and other minor editorial changes for clarity.

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Chapter 3

Page	Para.	Change/Reason For Change
5 of 5	3.3.4	Removed Nuclear Assessment responsibility to "Review the authorizing work documents for implementing design changes for systems, components and structures and ensure that the IP Nuclear Quality Assurance program requirements are incorporated." The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity.
5 of 5	3.3.4.a	Removed the word "periodic" and added surveillances to the methods used to determine design control activities meet the applicable requirements. Editorial.

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Chapter 4

Page	Para.	Change/Reason For Change
1 of 3	4.2	Removed responsibility assignments from this description section, editorial.
1 of 3	4.2(2)&(3)	<p>Changed: "Purchase requisitions for materials, parts, components or services for CPS are originated by the CPS organization having a need for the material, part, component or service for the operation, maintenance, refueling, repair or modification of the plant.</p> <p>Purchase requisitions are prepared in accordance with documented procedures that require:</p> <p>a.Applicable specifications, drawings, quality control requirements, and related documents be included or referenced."</p> <p>to: "Purchase requisitions for materials, parts, components or services are originated for the operation, maintenance, refueling, repair or modification of the plant. (CCT 8350)</p> <p>Purchase requisitions are prepared in accordance with documented procedures that require:</p> <p>a.Applicable specifications, drawings, quality requirements, and related documents be included or referenced." (CCT 8351)</p> <p>Editorial change.</p>
2 of 3	4.2(4)	<p>Removed "The Quality Assurance department verifies appropriate Quality requirements are specified." (CCT-8353) because the originating department is responsible for specifying requirements on purchase requisitions. The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity. Also other minor editorial changes.</p>

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Chapter 4

Page	Para.	Change/Reason For Change
2 of 3	4.2(5)	<p>Changed: "Quality Assurance performs a review to ensure the requirements ("a" through "f" above) have been met."</p> <p>to: "a review is performed to ensure the requirements ("a" through "f" above) have been met." (CCT-8347)</p> <p>Responsibility for ensuring the Quality requirements are specified in purchase requisitions is shared by NSED and Nuclear Support Services. The quality assurance oversight functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity. Also remove "for placement on the Qualified Suppliers List" editorial.</p>
2 of 3	4.2(6)	Changed "Nuclear Planning and Support" to "Purchasing and Material Control". Organizational change.
2 of 3	4.2(7)	Removed the word "periodic" and added surveillances to the methods used to determine design control activities meet the applicable requirements. Editorial.
3 of 3	4.3.2 & 4.3.3	Added section for Purchasing and Material Control responsibility and transferred responsibility for preparing purchase orders from Nuclear Support Services to Purchasing and Material Control. Also renumbered subsequent sections, to clarify responsibilities. Organizational change.
3 of 3	4.3.3.b	Added responsibility for Purchasing and Material Control to review purchase orders/contracts for quality assurance program requirements. To remove the Nuclear Assessment Department from in-line reviews and incorporate those reviews into the appropriate line functions.
3 of 3	4.3.4.d.	Removed "to perform", editorial.

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Chapter 4

Page	Para.	Change/Reason For Change
3 of 3	4.3.5	Removed Nuclear Assessment responsibility to "Verify appropriate Quality requirements are specified for materials, parts, components or services for CPS." The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity.
3 of 3	4.3.5.b	Removed the word "periodic" and added surveillances to the methods used to determine design control activities meet the applicable requirements. Editorial.

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Chapter 5

Page	Para.	Change/Reason For Change
1 of 2	5.2(1) and 5.3.1	Removed the word "issuing" from the individual departments' responsibilities for developing, reviewing, approving and complying with formal documentation as this activity is the responsibility of the document control organization which does this for each department. (CCT-8277)
1 of 2	5.2(2)	Removed reference to Table 2-1 which has been removed from the manual. (CCT-8278)
1 of 2	5.2(3)	Removed the word "periodic" and the responsibility assignment. Editorial.
2 of 2	5.3.2	Removed the Nuclear Assessment responsibility to "review selected CPS departmental procedures and instructions for QA program requirements." This responsibility statement was redundant to the other responsibility listed in 5.3.2.a and supports the approach that the quality assurance function of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity.
2 of 2	5.3.2.a.	Removed the word "periodic" and added ", are adequate". Editorial.

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Chapter 6

Page	Para.	Change/Reason For Change
1 of 3	6.2(1)	Removed description of how to make temporary changes to procedures as this is adequately described in the USAR and station procedures, manual simplification. Also corrected reference outline.
2 of 3	6.2(2)a.	Removed responsibility assignment from this description section.
2 of 3	6.2(2)f.	Spelled out inservice inspection prior to ISI.
2 of 3	6.2(2)g.	Removed Corrective Action documents from the list of controlled documents. Not all Corrective Action documents are controlled documents. Changed "Nuclear Policy Statements" to "policy documents".
3 of 3	6.2.(3)b.	<p>Changed: "A program for approving the receipted documents for use in activities associated with CPS by that organization."</p> <p>to: "A program for reviewing and approving the documents received for use in activities associated with CPS by that organization."</p> <p>Editorial.</p>
3 of 3	6.2(5)	Removed the word "periodic" and removed responsibility assignment from this description section. Editorial.
3 of 3	6.3.3.a.	Removed the word "periodic". Editorial.

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Chapter 7

Page	Para.	Change/Reason For Change
1 of 5	7.2	Removed responsibility assignments from this description section.
1 of 5	7.2(3)	Removed "The Quality Assurance department specifies the Quality Assurance program requirements that must be met by suppliers." Remove Nuclear Assessment from in-line document review and eliminate duplication in responsibility between NSED and Nuclear Assessment. (CCT-8354) This supports the approach that the quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity.
1 of 5	7.2(3)	<p>Changed: "Where necessary, the determination of a supplier's acceptability includes information obtained through audits of the supplier by the Quality Assurance organization."</p> <p>to: "Where necessary, a supplier's acceptability is determined by an audit of the supplier's Quality Assurance program." (CCT-8355)</p> <p>Editorial change requested by the Audits group to clarify meaning/intent, since such audits may be performed by a utility cooperative.</p>
1 of 5	7.2(3)	<p>Changed: "Such audits are performed in accordance with a written plan or checklist to determine the ability of suppliers to comply with Quality Assurance program requirements of the procurement document."</p> <p>to: "Such audits are performed in accordance with a written plan or checklist to determine the ability of the supplier to comply with the Quality Assurance program requirements of the procurement document." (CCT-8355)</p> <p>Editorial change.</p>

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Chapter 7

Page	Para.	Change/Reason For Change
1 of 5 and 2 of 5	7.2(3)	<p>Changed: "The determination of a supplier's acceptability may be made by means other than audits of the supplier by Quality Assurance."</p> <p>to: "The determination of a supplier's acceptability may be made by means other than audits."</p> <p>Changed: "When these means are either not available or do not permit a complete evaluation of a supplier's Quality capabilities, Quality Assurance will conduct a survey or an audit of the supplier."</p> <p>to: "When these means are either not available or do not permit a complete evaluation of a supplier's Quality capabilities, a survey or an audit will be conducted of the supplier."</p> <p>Changed: "The Quality Assurance department is responsible for maintaining the qualified suppliers list."</p> <p>to "A Qualified suppliers list is maintained." to remove language which implies Nuclear Assessment has the sole responsibility for determining supplier acceptability. (CCT-8356)</p>
2 of 5	7.2(4)	<p>Changed: "Purchasing and material control is assigned the responsibility of ascertaining that required technical and quality assurance reviews and evaluations..."</p> <p>to: "a review is performed to ensure that the required technical and quality assurance evaluations..."</p> <p>Manual simplification, describe program in description sections and assign responsibility in responsibility sections.</p>

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Chapter 7

Page	Para.	Change/Reason For Change
2 of 5	7.2(5)	<p>Changed: "Following the award of the contract or placement of the purchase order, the Quality Assurance organization is responsible for performing periodic surveillances and evaluations at the supplier's facility, as necessary, to verify continued compliance with the quality assurance requirements of the procurement documents. The results of these surveillances and evaluations are documented. Where specified in the purchase order or contract, source inspections at the supplier's facility are accomplished by the Quality Assurance organization or qualified agent to verify that the procured item or service is being supplied in compliance with the requirements of the procurement documents. Such inspections are accomplished in accordance with written procedures, plans, and/or checklists containing or referencing appropriate acceptance criteria."</p> <p>to: "Following the award of the contract or placement of the purchase order, surveillances and evaluations at the supplier's facility are conducted to verify continued compliance with the quality assurance requirements of the procurement documents. Where specified in the purchase order or contract, source inspections of the supplier's facility are accomplished by qualified individuals or qualified agent to verify that the procurement item or service is being supplied in accordance with the requirements of the procurement documents. Such inspections are accomplished in accordance with written procedures, plans, and/or checklists containing or referencing appropriate acceptance criteria. (CCT 7997)"</p> <p>Manual simplification/editorial, specifically defining the QA program in general rather than in terms of the Nuclear Assessment department's responsibilities. Responsibilities are described in the responsibility section.</p>

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Chapter 7

Page	Para.	Change/Reason For Change
2 of 5	7.2(6)	<p>Changed: "Upon receipt at CPS, Nuclear Planning and Support is responsible for the control of safety-related materials, parts, and components. Quality Assurance inspection personnel are responsible for inspecting, releasing, and identifying purchased material and equipment as to the inspection status as required by the purchase order."</p> <p>to: "Upon receipt at CPS, safety-related materials, parts, and components are controlled. Qualified inspection personnel are responsible for inspecting, releasing, and identifying purchased material and equipment as to the inspection status. (CCT 8357)."</p> <p>This change recognizes that the organizational structure for executing the quality assurance program may take various forms provided that persons and organizations assigned the quality assurance oversight functions have direct access to responsible management and sufficient independence from cost and schedule when opposed to safety considerations. Also removes the limitation on inspections to those specified in the purchase order. The Nuclear Assessment department will share the quality assurance function with the organization responsible for receipt inspection in that program effectiveness will be assured in other than an in-line approach as appropriate using surveillances and audits.</p>

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Page	Para.	Change/Reason For Change
2 of 5	7.2(7)	<p>Changed: "After receipt inspection, storeroom personnel of Nuclear Planning and Support are responsible for forwarding the material to a controlled storage area or releasing it for installation or further work. Personnel from other departments also perform acceptance activities such as evaluation of content of technical documents required by the purchase order, and the conduct of special tests and measurements which are identified in the purchase order. When these activities are accomplished, QA personnel verify that those acceptance activities were accomplished prior to final acceptance of an item. Receipt inspections are accomplished in accordance with written procedures and/or plans containing or referencing appropriate acceptance criteria."</p> <p>to: " Acceptance activities such as evaluation of content of technical documents required by the purchase order, and the conduct of special tests and measurements which are identified in the purchase order are also performed. Receipt inspections are accomplished in accordance with written procedures and/or plans containing or referencing appropriate acceptance criteria. After receipt inspection, the purchased material is forwarded to a controlled storage area or released for installation or further work. (CCT 8188)"</p> <p>Manual simplification, to describe the program in the description section and assign responsibility in the responsibility section.</p>

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Chapter 7

Page	Para.	Change/Reason For Change
2 of 5 and 3 of 5	7.2(8)	<p>Changed: "The validity of a supplier's certificate of conformance is ascertained through any of the following methods: source inspection, independent inspection agency, receipt inspections, surveillance, testing of hardware, Quality Assurance audits or surveillances.</p> <p>to: "The validity of a supplier's certificate of conformance is ascertained through any of the following methods: source inspection, independent inspection agency, receipt inspections, surveillance, testing of hardware, quality assurance audits or surveillances.</p> <p>Removed the capital letters from the words Quality Assurance which implies that only the Nuclear Assessment Department, formerly the Quality Assurance Department, audits these activities and recognize audit results from other departments/organizations (NUPIC, INDEX, NUMARC). (CCT-8358)</p>
3 of 5	7.2(10)	<p>Changed: "The Quality Assurance department conducts periodic surveillances and audits of the control measures..."</p> <p>to: "Surveillances and audits are conducted of the control measures..."</p> <p>and changed "Quality Assurance audits of suppliers" to "Audits of suppliers".</p> <p>Remove the wording which implies only the Nuclear Assessment Department audits these activities and recognize audit results from other departments/organizations (NUPIC, INDEX, NUMARC). (CCT-8358)</p>
4 of 5	7.3.3(b)	<p>Changed "Quality Assurance" to "Qualified inspectors". To use qualified inspectors in other departments.</p>
4 of 5	7.3.5.a	<p>Changed "evaluations" to "surveillances", and removed "as necessary". Editorial.</p>
4 of 5	7.3.5.b	<p>Changed "evaluations" to "audits" and removed "periodic" and "as necessary". Editorial.</p>

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Page	Para.	Change/Reason For Change
4 of 5	7.3.5.c	Removed the word "periodic". Editorial.
5 of 5	7.3.5.d	Removed the word "as necessary". Editorial.
5 of 5	7.3.5e	Changed "evaluations or audits" to "the surveillances and audits". Editorial.
5 of 5	7.3.5	Removed "Perform and document receipt inspection of purchased items, including verifying the required documentary evidence of conformance to procurement requirements is available at CPS and verifying activities of other groups are accomplished prior to final acceptance of an item and release for use." Organizational change, receipt inspection may be performed by another organization in the future.
5 of 5	7.3.5	Removed reference to performance of receipt or source inspections by the Nuclear Assessment department as these inspections may be done by another organization in the future. Removed "Review purchase requisitions and specify the Quality Assurance Program requirements for the item(s) to be procured." because this is covered in section 7.3.2.a Nuclear Station Engineering responsibilities. The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity.

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Chapter 8

Page	Para.	Change/Reason For Change
1 of 3	8.2.a.	Changed "items of purchase" to "purchased items". Editorial.
2 of 3	8.2	Removed responsibility assignments from this description section, editorial.
2 of 3	8.2(3)	<p>Changed: "During fabrication, assembly, installation, and shipping activities at a supplier's facility, the supplier is responsible for identification and control of materials, parts, and components in accordance with the requirements of the IP purchase order."</p> <p>to: "During fabrication, assembly, installation, and shipping activities at a supplier's facility, the supplier conducts verification inspections and is responsible for identification and control of materials, parts, and components in accordance with the requirements of the IP purchase order." (CCT-8296)</p> <p>To clarify the supplier's responsibility for quality under the Quality Assurance Program.</p>
2 of 3	8.2(5)	Removed "verification inspections and" from the sentence stating what the Nuclear Assessment Department conducts. To remove prescriptive inspections from the Quality Assurance Program Manual. The performance of surveillances and audits adequately describes the quality function to assure program effectiveness. Also removed the word "periodic", editorial.
2 of 3	8.3.2.a	Removed "Develop and" from the sentence which describes the program responsibility for material identification and control. Take credit for the program which has already been developed.
3 of 3	8.3.3.a	Removed "Develop and" from the sentence which describes the responsibility for the inventory control system. To take credit for the inventory system which has been developed.
3 of 3	8.3.4	Removed "Ensure that suppliers comply with approved procedures." to remove implied continuous oversight and cover with the remaining responsibility for conducting surveillances and audits.

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Chapter 8

Page	Para.	Change/Reason For Change
3 of 3	8.3.4	<p>Changed: "Conduct verification inspections and periodic surveillances and audits of the identification and control of items to ensure compliance with the requirements of this chapter."</p> <p>to: "Conduct surveillances and audits of the identification and control of items to ensure compliance with program requirements. (CCT 8298)"</p> <p>Remove prescriptive inspections from the Quality Assurance Program Manual and an editorial change. The performance of surveillances and audits adequately describes the quality functions to assure program effectiveness.</p>

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Chapter 9

Page	Para.	Change/Reason For Change
1 of 4	9.2	Removed "Special processes include welding, heat treatment, nondestructive examination (testing), chemical cleaning, pipe bending, and special coatings." To eliminate redundant material covered in Section 9.1.
2 of 4	9.2	Removed: "Nuclear Station Engineering specifies special processes in technical documents and procurement requisitions. The control of scheduled ISI examinations and inspections is the responsibility of the Nuclear Station Engineering Department. The control of other special processes is the responsibility of CPS Plant Staff. The control of NDE to support plant operations is the responsibility of the QA department." Also removed other responsibility assignments from this description section. Responsibility for Non-destructive Examination has been assigned to Nuclear Station Engineering. (CCT-8005) Organizational change, and to describe responsibility in the responsibility section.
2 of 4 and 3 of 4	9.3.1a&b and 9.3.2i	Removed "Establish and " from these responsibilities to take credit for the established programs. Editorial.
3 of 4	9.3.2 and 9.3.3	Consolidated Non-destructive Examination (NDE) responsibilities in Nuclear Station Engineering. The Nuclear Station Engineering Department performs the majority of the NDE at Clinton Power Station. Through the implementation of the inservice Inspection Program, this change will consolidate all NDE activities.
3 of 4	9.3.3a	Removed the word "periodic", editorial.
4 of 4	9.3.3	Removed "If radiography is performed by IP, maintain the required NRC license for radioactive source material." from the list of Nuclear Assessment responsibilities. This type of work is contracted through a licensed provider and NSED has the responsibility to contract this work.

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Chapter 10

Page	Para.	Change/Reason For Change
2 of 3	10.2	Removed "Qualification requirements of inspection personnel; and" from the list of items identified in the programs of inspection. To remove implication that inspector qualification requirements are specified in work documents. Also other minor editorial changes including the removal of responsibility assignments.
2 of 3	10.2.c.	<p>Changed: "Inspection personnel are qualified and certified in accordance with the requirements of applicable codes or standards and are persons other than those who performed or directly supervised that activity being inspected. The qualifications and certifications of inspection personnel are maintained current."</p> <p>to: "Inspection personnel are qualified and certified in accordance with the requirements of applicable codes, standards and written procedures. Inspections are performed by persons other than those who performed or directly supervised the activity being inspected. The qualifications and certifications of inspection personnel are maintained current. (CCT 24343)"</p> <p>Editorial clarification.</p>

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Page	Para.	Change/Reason For Change
2 of 3	10.2	Removed "The Quality Assurance department is responsible for inspection of plant structures, systems, and components. The Nuclear Station Engineering department is responsible for scheduled ISI Program examinations and inspections. Inspections conducted include: maintenance and modification inspection, receipt inspection, new fuel inspection, inspections of surveillance tests, inspections of functional and preoperational tests, ISI examinations and inspections, and housekeeping inspection. The Quality Assurance department is responsible for evaluating and determining the acceptability of inspection results in accordance with specified inspection criteria. The Nuclear Station Engineering Department is responsible for evaluating and determining the acceptability of scheduled ISI Program examination and inspection results. The Quality Assurance Department and the Nuclear Station Engineering Department may use the services of other IP department personnel or may engage the services of external organizations to accomplish any inspections, evaluations or reviews of inspection and test results." This material is adequately covered in the responsibility sections and the implementing procedures. Manual simplification and Non-destructive Examination program is the responsibility of the Nuclear Station Engineering Department. (CCT-8017)

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Chapter 10

Page	Para.	Change/Reason For Change
2 of 3	10.2	<p>Changed: "The need to invoke the requirements of ANSI N45.2.6 on suppliers is evaluated by the Quality Assurance department and the Nuclear Station Engineering Department during the review of procurement documents for items and services. The complexity of the item and the extent of source and receipt inspection are factors which are considered when determining whether or not to invoke ANSI N45.2.6."</p> <p>to: "The need to invoke the requirements of ANSI N45.2.6 1978 'Qualification of Inspection, Examination, and Testing Personnel for Nuclear Power Plants' on suppliers is evaluated during the review of procurement documents for items and services. The complexity of the item and the extent of source and receipt inspection are factors which are considered when determining whether or not to invoke ANSI N45.2.6. (CCT-8018)"</p> <p>To remove the Nuclear Assessment department from in-line review of procurement documents as described in changes to Chapter 4. Also leaves discussion of responsibilities to the responsibility section.</p>
2 of 3	10.2(3)	Removed "IPQA", the word "periodic", and removed the responsibility assignment/editorial.
3 of 3	10.3.1.a	Removed "Develop and" from CPS Plant Staff responsibilities for implementing a program that provides for inspection. To take credit for the program that has already been developed.
3 of 3	10.3.2.b	<p>Changed: "Develop and implement an inspection program for scheduled ISI program examinations and inspections."</p> <p>to: "Implement an inspection program for scheduled ISI program examinations and inspections and perform NDE to support plant operations."</p> <p>Take credit for developed programs and transfer NDE to Nuclear Station Engineering.</p>

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Page	Para.	Change/Reason For Change
3 of 3	10.3.3.a.	Changed: "Develop and implement an inspection program for CPS." to: "Implement an inspection program for CPS, excluding Material Receipt, ISI, NDE and Welding Inspection. (CCT 8021)" Take credit for inspection program which has been developed and clarify scope of responsibility.
3 of 3	10.3.3.c.	Changed "the" to "an", editorial.
3 of 3	10.3.3.d.	Removed the word "periodic", editorial.

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Chapter 11

Page	Para.	Change/Reason For Change
2 of 3	11.3.1.a	Removed "Develop and" from the CPS Plant Staff responsibility for implementing testing programs to take credit for the programs which have been developed.
3 of 3	11.3.3	Removed Nuclear Assessment responsibility for reviewing and approving test procedures and approving test results. The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity.
3 of 3	11.3.3.a	Removed the word "periodic", editorial.

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Chapter 12

Page	Para.	Change/Reason For Change
3 of 3	12.2	Removed responsibility assignments from this description section, editorial.
3 of 3	12.2(4)	Removed the word "periodic", editorial.
3 of 3	12.3.1 (a)(b)(d)	Removed the wording under Plant Staff responsibility to develop programs and leave only the responsibility for implementation to take credit for the programs which have already been developed.
3 of 3	12.3.2	Removed the Nuclear Assessment responsibility to review the M&TE control program of suppliers performing work at CPS. Suppliers performing work at CPS are subject to audits and surveillances (per Chapter 7) which verify compliance with the requirements of the CPS M&TE program.
3 of 3	12.3.2a	Removed the word "periodic", editorial.

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Chapter 13

Page	Para.	Change/Reason For Change
1 of 2	13.2(4)	Removed "document reviews" from the methods used to determine if appropriate procedures and controls are being applied regarding handling, storage and shipping of materials and equipment. To remove the Nuclear Assessment Department from the in-line document review process and clarify that this is verified during audits and surveillances. (CCT-8007) Also removed the word "periodic" and responsibility assignments from this section, editorial.
2 of 2	13.3.1 and 13.3.3	Removed the wording which refers to developing programs as these programs have been developed and currently only require implementation.
2 of 2	13.3.1.b	Removed the word "radioactive", editorial.
2 of 2	13.3.4	Removed "document reviews" from the Nuclear Assessment responsibility to verify compliance with the requirements of this chapter. To remove the Nuclear Assessment Department from the in-line document review process and clarify that this activity is verified by audits and surveillances. Also removed the word "periodic", editorial.

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Chapter 14

Page	Para.	Change/Reason For Change
1 of 3	14.1	<p>Changed: "To define the requirements and responsibilities for identifying the inspection, testing and operational status of materials, parts, components and assemblies to assure that only items which have passed the required inspections and tests are installed or operated."</p> <p>to: "To define the requirements and responsibilities for identifying the inspection, test and operating status of materials, parts, components and assemblies to assure that only items which have passed the required inspections and tests are installed or operated."</p> <p>Editorial.</p>
2 of 3	14.2b	Changed QA to Quality Assurance, editorial.
2 of 3	14.2	Removed the responsibility assignments from this description section, editorial.

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Chapter 14

Page	Para.	Change/Reason For Change
2 of 3	14.2(2)	<p>Changed: "Quality Assurance is responsible for the identification of the inspection status on materials, parts and components. As imposed by the contract documents, suppliers performing activities at CPS or furnishing materials, parts, components or assemblies for use at CPS also have responsibilities for the identification of inspection, test and operating status of items under their control. CPS Plant Staff and the QA Department review and approve the programs of suppliers performing work at CPS to ensure compatibility with the CPS status indication system."</p> <p>to: "Inspection personnel are responsible for the identification of the inspection status on materials, parts and components. (CCT 7998) As imposed by the contract documents, suppliers performing activities at CPS or furnishing materials, parts, components or assemblies for use at CPS also have responsibilities for the identification of inspection, test and operating status of items under their control. (CCT 8083) The programs of suppliers performing work at CPS are reviewed and approved to ensure compatibility with the CPS status indication system." (CCT 8084)</p> <p>Recognize that not all inspection personnel report to the Nuclear Assessment department. Remove the Nuclear Assessment department from the in-line document review process and clarify that verification by Nuclear Assessment is through audits and surveillances performed in accordance with Chapter 7. Also remove responsibility assignments from this description section.</p>
2 of 3	14.2(3)	Removed the word "periodic", editorial.
2 of 3 and 3 of 3	14.3.1 14.3.2	Removed the references to developing programs and establishing procedures. It is only necessary to implement the established procedures and developed programs in place currently.
3 of 3	14.3.1.d	Moved the responsibility to implement programs to indicate status of nonconforming items from the Quality Assurance Department to Plant Staff. Plant Staff is responsible for the programs which indicate status.

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Chapter 14

Page	Para.	Change/Reason For Change
3 of 3	14.3.3	Removed the responsibility for reviewing and approving programs of suppliers to ensure compatibility with the various status indicating systems from Nuclear Assessment as this responsibility was shared with Plant Staff. (CCT-8084) The Nuclear Assessment department will continue to perform audits and surveillances per Chapter 7 to verify this activity as necessary.
3 of 3	14.3.3	Plant Staff is responsible for the programs which indicate status. Moved responsibility for implementing programs to indicate status of nonconforming items from Nuclear Assessment to Plant Staff to reflect this.
3 of 3	14.3.4	Removed the responsibility for indicating receipt inspection status. This responsibility may be performed by another organization in the future.
3 of 3	14.3.4.a.	Removed the word "periodic", editorial.

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Chapter 15

Page	Para.	Change/Reason For Change
1 of 4	15.2.(1)c.	Replaced "they" with "nonconforming items", editorial clarification.
2 of 4	15.2(1)f. d)	Corrected the spacing between the words "for" and "that".
2 of 4	15.2.i	Removed "and reviewed by the Quality Assurance Department." after "Acceptable alternatives to original inspection or test requirements may be used provided they are assessed for adequacy and the rationale documented." The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity. Also added a comma to correct punctuation.
2 of 4	15.2	Removed "Reports documenting nonconforming items are reviewed by the Quality Assurance Department prior to closeout to verify that the nonconformances were properly documented, dispositioned, corrected and inspection and/or acceptance verification is completed." The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity.
3 of 4	15.2(5)	Changed "the Vice President - Clinton Power Station" to "the Vice President and Manager Clinton Power Station".
3 of 4	15.2(7)	Removed the word "periodic" and the responsibility assignment, editorial.
3 of 4	15.3.3.b.	Changed: "Evaluate and document, together with NSED, the safety significance of nonconforming items." to: "Coordinate with NSED to evaluate and document the safety significance of nonconforming items." Editorial.

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Page	Para.	Change/Reason For Change
3 of 4	15.3.3.c	<p>Changed: "Develop and implement procedures, instructions or work control documents for the correction of nonconforming items with repair or rework dispositions."</p> <p>to: "Develop and implement procedures, instructions or work control documents for the control and correction of nonconforming items with repair or rework dispositions."</p> <p>Editorial.</p>
4 of 4	15.3.4	<p>Removed the words "Establish and" before Nuclear Support Services' responsibility to implement an effective program for processing supplier nonconformance reports. To take credit for the established program.</p>
4 of 4	15.3.5.a	<p>Removed the words "Establish and" from the Nuclear Station Engineering responsibility to implement a program for dispositioning nonconforming items. To take credit for the established program.</p>
4 of 4	15.3.5.b.	<p>Changed: "Evaluate and document, together with Plant Staff, the safety significance of nonconforming items."</p> <p>to: "Coordinate with Plant Staff to evaluate and document the safety significance of nonconforming items."</p> <p>Editorial.</p>

Chapter 15

Page	Para.	Change/Reason For Change
4 of 4	15.3.6	<p>Removed the Nuclear Assessment responsibilities:</p> <ul style="list-style-type: none">-Establish and implement a program for verifying acceptable disposition as required by the disposition of nonconformances.-Establish and implement programs for the review of nonconformances to verify effectiveness in meeting the requirements of the chapter.-Perform review of conditional release justifications.-Ensure that procurement documents require suppliers to establish a nonconformance program consistent with this chapter. <p>The quality assurance functions of assuring effectiveness will be implemented in a performance based (off-line) manner as appropriate while leaving departments performing a quality activity with the in-line responsibility for that activity. The Nuclear Assessment Department will still perform periodic surveillances of the nonconformance programs.</p> <p>Also changed: "Conduct periodic surveillances/ audits of the Nonconformance Program at CPS to ensure compliance with the requirements of this chapter."</p> <p>to: "Conduct surveillances and audits of the nonconformance control program at CPS to ensure compliance with the requirements of the IP Nuclear Quality Assurance Program."</p> <p>Editorial.</p>

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Chapter 16

Page	Para.	Change/Reason For Change
1 of 3	16.2(1)	<p>Changed: "Reporting may be accomplished through various reporting documents as defined in documented procedures."</p> <p>to: "Reporting may be accomplished through various reporting documents as defined in procedures."</p> <p>Editorial.</p>
1 of 3	16.2(2)	<p>Changed: "The IP Quality Assurance Department performs trend analysis on conditions adverse to plant safety and/or quality to determine if a trend representing a significant condition adverse to plant safety and/or quality exists. Nuclear Station Engineering performs trend analysis of conditions documented on maintenance work documents to identify equipment failure and reliability concerns."</p> <p>to: "Trend analysis is performed on conditions adverse to plant safety and/or quality to determine if a trend representing significant conditions adverse to plant safety and/or quality exists. (CCT 8014) Trend analysis of conditions documented on maintenance work documents to identify equipment failures and reliability concerns is also performed."</p> <p>To describe the program in the program description section and assign responsibilities in the responsibility section and other minor editorial changes.</p>
2 of 3	16.2(4)	<p>Changed: "Corrective action is evaluated by the Quality Assurance Department to determine its effectiveness, including steps taken to identify the cause of significant conditions adverse to plant safety..."</p> <p>to: "Corrective action is evaluated to determine its effectiveness, including steps taken to identify the cause of significant conditions adverse to plant safety..."</p> <p>This change removes responsibilities assignment from the program description section.</p>

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Chapter 16

Page	Para.	Change/Reason For Change
2 of 3	16.3	Removed reference to established trend analysis programs and renumbered sections accordingly. Trend analysis is just one of the tools used to evaluate the effectiveness of the corrective action program. Remove unnecessary details from Quality Assurance Manual.
2 of 3	16.3.2.a	Removed "Establish and" in the beginning of sentence describing the Nuclear Program Departments' responsibility for implementing a corrective action procedure(s)...
3 of 3	16.3.4.b.	Removed the word "periodic", editorial.

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Chapter 17

Page	Para.	Change/Reason For Change
1 of 2 and 2 of 2	17.2	Removed responsibility assignments from this description section, editorial.
2 of 2	17.2(5)	Removed the word "periodic", editorial.
2 of 2	17.3.1.b	Removed the capital letters from the words Quality Assurance, corrected department title, removed the word "maintenance" and added a comma to the sentence, editorial.
2 of 2	17.3.3.a	Removed the word "periodic" and added "surveillances and", editorial.

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Chapter 18

Page	Para.	Change/Reason For Change
1 of 3	18.2(1)	Changed: "The IP Quality Assurance organization has the responsibility for implementing the QA audit program. The audit program provides for the following:" to: "The audit program provides for the following:" Editorial.
1 of 3	18.2(1)b	Changed: "Additionally, QA program audits include indoctrination and training programs; interface control between IP, the audited organizations and other affected organizations; USAR commitments; and Technical Specification requirements." to: "Additionally, program audits include indoctrination and training programs; interface between IP audited organizations and other affected organizations; USAR commitments; and Technical Specification requirements. (CCT 8105)" Editorial.
2 of 3	18.2(1)k.	Changed "re-audits" to "re-audit", editorial.

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Chapter 18

Page	Para.	Change/Reason For Change
2 of 3	18.2(2)	<p>Changed: "Within the Quality Assurance organization, the Supervisor - Audits has the responsibility for maintaining and implementing an audit plan which verifies that applicable elements of the Quality Assurance program have been developed, documented, and implemented in accordance with the requirements of this manual. Audits will be initiated as early in the life of the activity as practicable consistent with the schedule for accomplishing the activity to assure timely implementation of the quality assurance requirements. The plan is reviewed periodically to insure that it is current and may be augmented at any time based on recommendations from the Nuclear Review and Audit Group, or Nuclear Program personnel as the scope of work and other requirements for auditing an activity change."</p> <p>to: "Audits are initiated as early in the life of the activity as possible consistent with the schedule for accomplishing the activity to assure timely implementation of the quality assurance requirements. (CCT 1433) Audits may be augmented at any time based on recommendations from the Nuclear Review and Audit Group, or Nuclear Program personnel as the scope of work and other requirements for auditing an activity change. (CCT 1434)"</p> <p>Editorial/manual simplification, remove unnecessary detail from the QA Manual.</p>
2 of 3	18.2(4)	<p>Changed: "IP management obtains an independent audit of the IP Quality Assurance organization on an annual basis."</p> <p>to: "IP management obtains independent audits of the IP Nuclear Assessment organization."</p> <p>To remove commitment to audit annually and audit biennially, which is consistent with Regulatory Guide 1.33 Quality Assurance Program requirements (Operations).</p>
3 of 3	18.3.3	<p>Moved responsibility for Independent Safety Engineering Group to the Nuclear Assessment organization. Organization change.</p>

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Appendix A

Page	Para.	Change/Reason For Change
NA	NA	The former Appendix A "Revisions to the IP Nuclear Program Quality Assurance Manual" was deleted to simplify the manual as the revision of the manual is addressed in Chapter 2 and implementing procedure QAP-102-02. This Appendix was replaced with the new Appendix A "Glossary of Terms".
A-3 of 10	Examina- tion	Changed "gaging" to "gauging", editorial.
A-3 of 10	Hold Point	Changed "the Quality Verification section (QV) of the Quality Assurance department" to "inspection personnel". and changed "QV" to "inspection personnel". To remove wording which implies that all inspection personnel report to the Nuclear Assessment department.
A-6 of 10	Receipt Inspection	Removed "performed by Quality Assurance Inspectors verifying that the" and replaced with "which verifies that" because receipt inspectors may be transferred to another department, in the future.
A-10 of 10	Verifica- tion/ Inspection Point	Changed "Quality Verification (QV)" to "inspection personnel". To remove implication that all inspection personnel report to Nuclear Assessment.

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Appendix B

Page	Para.	Change/Reason For Change
B-6 of 12	NA	Corrected reference to Chapter 16 applicability to the security plan.