

BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 7, 1983

BECO Letter No. 83-177

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

License No. DPR-35
Docket No. 50-293

Quality Assurance Program Description
Submittal (10CFR50.54(a))

- References: (a) Letter from Dennis L. Ziemann, Division of Reactor Licensing, to J.E. Howard, dated November 12, 1975, Subject: QA Program Description Acceptance.
- (b) Letter from W.D. Harrington, Sr. Vice President - Nuclear (BECO) to the NRC Regional Administrator (Region I), dated June 16, 1983; Subject: QA Program Description Submittal - Request for Schedule Relaxation.

Dear Sir:

Pursuant to 10CFR50.54(a)(2), Enclosure (A) is forwarded for review; it is the current description of the Quality Assurance Program. It is being forwarded according to the schedule requested in Reference (b).

The NRC previously approved, via Reference (a), our Quality Assurance Program Description dated October 1975. A comparison of the October, 1975 document and the current Quality Assurance Program has been performed, and changes from the October 1975 QA Program Description are identified in Attachments (1) and (2).

Attachment (1) identifies changes which were found not to reduce the commitments of the October 1975 QA Program Description.

Attachment (2) identifies a change by which some of the commitments of the October 1975 QA Program Description were reduced. Justification for this change is given in the attachment.

We will fully implement the program following NRC approval or 60 days from date of this letter, whichever occurs earlier.

Accol
Add: W. Haas

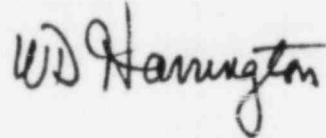
BOSTON EDISON COMPANY

Regional Administrator

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We believe that the information forwarded by this letter satisfies the requirements of 10CFR50.54(a)(2). Should you require any additional information, or have any questions, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W.D. Harrington". The signature is written in a cursive, slightly slanted style.

JK/mat

Attachments:

- (1) QA Program Changes - No Commitment Reductions
- (2) QA Program Change - Commitment Reduction

Enclosure:

- (A) Boston Edison Quality Assurance Manual, Volume II,
(BEQAM II)

1975 QA PROGRAM CHANGES - NO COMMITMENT REDUCTIONSECTION 1

The changes in this section include the following:

- (1) Revised to incorporate organizational changes; these changes are reflected throughout the BEQAM, Volume II.
- (2) Editorial revisions.

Some material appearing in Section 1 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 2, 3, 4, 7, 15, and 18.

SECTION 2

The changes in this section include the following:

- (1) Revised to incorporate more recent editions of Regulatory Guide/ANSI Standards.
- (2) Revised the use of Project Quality Plans.
- (3) Revised to incorporate 10CFR50.59 requirements.
- (4) Incorporated process for including non-safety-related items on Q-List at discretion of executive management.
- (5) Incorporated process for applying QA controls to selected fire protection activities and licensed shipping casks.
- (6) Editorial revisions.

Some material appearing in Section 2 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 1, 4, 5, and 10.

SECTION 3

The changes in this section include the following:

- (1) Revised to incorporate current BECo processes for design control.
- (2) Editorial revisions.

Some material appearing in Section 3 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 2 and 5.

SECTION 4

The changes in this section include the following:

- (1) Revised to incorporate current procurement process.
- (3) Editorial revisions.

Some material appearing in Section 4 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 2 and 17.

SECTION 5

The changes in this section include the following:

- (1) Included Station quality assurance related Special Orders/Procedures with department procedures.
- (2) Incorporated processing requirements for supplier submitted procedures.
- (3) Deletion of quality assurance related procedure index for all department procedures.
- (4) Revised BECo procedure controls.
- (5) Editorial revisions.

Some material appearing in Section 5 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 2, 3, and 6.

SECTION 6

The changes in this section include the following:

- (1) Incorporated current document control requirements.

Some material appearing in Section 6 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Section 5.

SECTION 7

The changes in this section include the following:

- (1) Editorial revisions.

Some material appearing in Section 7 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 1 and 18.

SECTION 8

The changes in this section include the following:

- (1) Incorporated traceability requirements.
- (2) Editorial changes.

SECTION 9

The changes in this section include the following:

- (1) Editorial changes.

Some material appearing in Section 9 of the 1975 QA Program Description has been relocated to Section 10.

SECTION 10

The changes in this section include the following:

- (1) Reflects current inspection control requirements and processing of inspection reports.
- (2) Editorial changes.

Some material appearing in Section 10 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 2, 5, 9, 12, and 16.

SECTION 11

The changes in this section include the following:

- (1) Incorporated requirements for deficiencies identified during proof-testing and post-work testing.
- (2) Incorporated personnel and performance requirements for tests.
- (3) Editorial revisions.

SECTION 12

The changes in this section include the following:

- (1) Revised responsibilities and calibration requirements to improve the control of measuring and test equipment.
- (2) Incorporated the process of controlling new measuring and test equipment.
- (3) Incorporated the process of controlling calibrations performed by the Engineering, Planning, and Research Department.
- (4) Editorial revisions.

Some material appearing in Section 12 of the 1975 QA Program Description has been relocated to Section 18.

SECTION 13

The changes in this section include the following:

- (1) Editorial changes.

Some material appearing in Section 13 of the 1975 QA Program Description has been relocated to Section 18.

SECTION 14

The changes in this section include the following:

- (1) Clarified the scope and purpose of tagging equipment and systems.
- (2) Editorial changes.

Some material appearing in Section 14 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 5, 15, and 18.

SECTION 15

The changes in this section include the following:

- (1) Simplified the disposition of supplier's NCR's.
- (2) Detailed use of NCR's at installation inspection.

Some material appearing in Section 15 of the 1975 QA Program Description has been relocated to a more appropriate section; specifically, Section 16.

SECTION 16

The changes in this section include the following:

- (1) Editorial changes.

Some material appearing in Section 16 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 17 and 18.

SECTION 17

The changes in this section include incorporation of the following Quality Assurance record requirements:

- (1) Review and approval of supplemental information.
- (2) Fire protection classification.
- (3) Preservation
- (4) Receipt Control
- (5) Safekeeping
- (6) Identification
- (7) Non-permanent Classification

Some material appearing in Section 17 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 2 and 5.

SECTION 18

The changes in this section include the following:

- (1) Incorporated requirements for dispositioning Deficiency Reports.
- (2) Editorial changes.

Some material appearing in Section 18 of the 1975 QA Program Description has been relocated to more appropriate sections; specifically, Sections 1 and 16.

1975 QA PROGRAM CHANGES - COMMITMENT REDUCTION1975 QA PROGRAM DESCRIPTION - SECTION 2

ANSI N45.2.12, Draft 3, Revision 1, June 1973

CHANGE DESCRIPTION

The QA Program commits BECo to the 1977 version of ANSI N45.2.12 and to the 1976 version of N18.7. The previous program commitment was to the 1973 draft version of N45.2.12 which required "annual" audits of certain QA Program elements. The 1977 edition requires audits to be regularly scheduled on the basis of their status and importance. The revised program requires bi-annual audits of QA Program elements consistent with N18.7, Paragraph 4.5.

JUSTIFICATION

The revised audit program satisfies 10CFR50, Appendix B. The revised audit program also commits to audit frequencies which are consistent with the ANSI N18.7-1976 and Regulatory Guide 1.33, Rev. 2; the choice of ANSI N45.2.12-1977 ensures this consistency, and reflects current industry practice. Commitment to Regulatory Guide 1.144 also reflects the current NRC position. Audit frequencies are consistent with Boston Edison's Technical Specifications.