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NRC-94-0132

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43

Subject: Quality Assurance Program Change - Procedure Upgrade Program

In accordance with 10CFR50.54(a), Detroit Edison requests NRC review and approval of a change to the Fermi 2 Quality Assurance Program as contained in Section 17.2 of the Updated Final Safety Analysis Report (UFSAR).

The proposed change will consolidate the layers of administrative procedures at Fermi 2 in order to make it easier for workers to identify the administrative controls over the process they are using, and to eliminate duplication. The planned change will reduce the challenges to procedure users and also add efficiency to the procedure revision process. Currently, as described in Section 17.2.2.2 of the UFSAR, the QA Program is addressed in the Fermi Management Policy (FMP) and the Fermi Management Directives (FMD). There is considerable duplication between Section 17.2 of the UFSAR, which is the QA Program referenced by 10CFR50.54(a)(2), and the FMP and FMDs. Currently, requirements and implementing actions are contained in the FMDs, Fermi Interfacing Procedures (FIPs) and organizational administrative procedures.

In the future, only Section 17.2 will be considered the Quality Assurance Program Description (QAPD) which meets the requirements of 10CFR50 Appendix B. This will be the only top tier document which describes QA Program requirements. Quality Assurance requirements and implementing actions previously described in the Fermi Management Policy & Directives Manual, Fermi Interfacing Procedures, and organizational administrative procedures will be consolidated and contained in the Fermi Conduct Manuals. The Conduct Manuals will be organized based on functional areas to make it easy for the worker to know where to go to obtain information. Management Policy statements will endorse the Conduct Manuals. The attached figure shows the current and planned hierarchy of administrative controls.

A004.1

The majority of this change does not reduce any commitment in the QA Program and so meets the criteria of 10CFR50.54(a)(3) to be implemented without prior NRC approval. One aspect can be considered a reduction in commitment, therefore, NRC approval is requested. Currently, Section 17.2.2.2.1 requires Fermi Management Directives to be reviewed by the Director, Nuclear Quality Assurance and approved by the Senior Vice President, Nuclear Generation. Currently, the Senior Vice President - Nuclear Generation does not review revisions to Section 17.2. When the proposed change is implemented, the Director, Nuclear Quality Assurance and the Senior Vice President - Nuclear Generation will review changes to Section 17.2 of the UFSAR in order to assure the same level of review for the QA Program. The Conduct Manuals, per the proposed Section 17.2.2.2.1 will be reviewed by the management of the affected organization and approved by the Plant Manager.

Currently, Section 17.2 only states that appropriate levels of management approve implementing procedures. Since the FMDs will be consolidated into the Conduct Manuals, the reduction in approval authority can be considered a reduction in commitment. However, the document containing the QA Program requirements (Section 17.2) will receive the same level of review as currently described for the FMDs in Section 17.2. Implementing action requirements will be approved at a higher level than currently specified for implementing procedure review. Therefore, an appropriate level of review is maintained by this change. This change continues to meet the requirements of 10CFR50, Appendix B. The parts of Section 17.2 of the UFSAR affected by the procedure upgrade program are: 17.2.1.5.2, 17.2.2.1.3, 17.2.2.2, 17.2.2.2.1, 17.2.2.2.2, 17.2.2.2.3, 17.2.2.3, 17.2.2.6, 17.2.2.8, 17.2.3, 17.2.4.1, 17.2.5, 17.2.6, and Table 17.2-1.

Enclosure 1 describes the changes to the affected sections. Enclosure 2 contains marked up pages of Section 17.2.

Detroit Edison would appreciate prompt review and approval of this proposed change, as discussed in a meeting between Detroit Edison and NRC representatives on December 5, 1994. Review and approval by the end of January 1995 would be greatly appreciated.

Please contact Lynne S. Goodman at (313) 586-4097 with any questions.

Sincerely,

Enclosures

cc: B. L. Burgess
T. G. Colburn
J. B. Martin
M. P. Phillips
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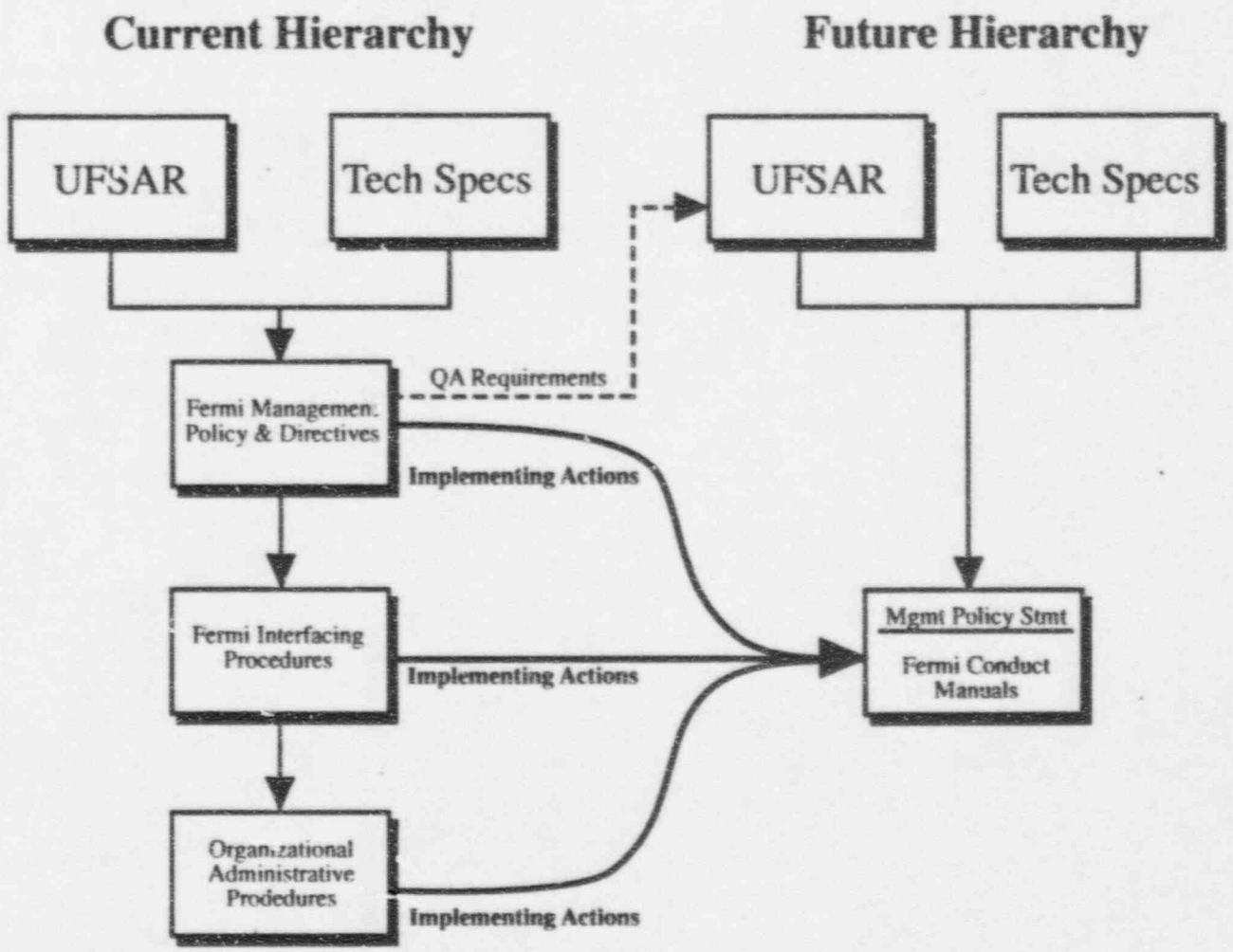
NRC Region III

Administrative Hierarchy



ENCLOSURE 1

SUMMARY OF SPECIFIC CHANGES

Sections 17.2.2.2 and 17.2.2.2.1 -

Redescribes location of QA program description from portions of FMP and FMDs to Section 17.2 of the UFSAR. Describes Fermi Conduct Manuals as the administrative implementing procedures. Mentions the Conduct Manuals are endorsed by management in Management Policy Statements. Describes approval for Section 17.2 and Conduct Manuals. Relocates and expands matrix of 18 criteria of 10 CFR 50 Appendix B from Section 17.2 to QA Conduct Manual. Expands matrix to include QA regulatory guides and endorsed QA ANSI standards.

Section 17.2.2.2.2 -

Deleted. With the consolidation of administrative implementing procedure tiers, the information is redundant to information now in Section 17.2.2.2, except for the sentence regarding QA review of implementing procedures directly or during audits or surveillances, which was already redundant to Section 17.2.6.

Section 17.2.2.2.3 -

Deleted. Startup test program was completed, so the Startup Manual procedures no longer are appropriate to discuss in the QA Program.

Section 17.2.2.8 -

Deleted mention of preoperational and startup test programs since they are completed.

Sections 17.2.1.5.2, 17.2.2.1.3, 17.2.2.3, 17.2.2.6, 17.2.4.1 -

Revised references to FMP and/or FMDs, since they are eliminated.

Section 17.2.3 -

Deleted "departmental" when referring to design control procedures. The Conduct Manuals will be organized by functional areas rather than departments.

Section 17.2.4.1 -

Deleted that procedures are issued by responsible organizations. The Conduct Manuals will be issued centrally and are organized by functional areas rather than by organizations.

Section 17.2.5 and 17.2.6 -

In Section 17.2.5 the list of procedures is revised to reflect Conduct Manual as being administrative implementing procedures and to group technical procedures. The technical procedures previously listed in Section 17.2.6 are now listed in Section 17.2.5 instead and Section 17.2.6 now mentions technical procedures and Fermi Conduct Manuals rather then list some procedures.

Table 17.2-1 -

Deleted. As discussed earlier, the matrix is now referenced in Section 17.2 as being located in the QA Conduct Manual. It will also be expanded in its scope.

ENCLOSURE 2

MARKED UP UFSAR
SECTION 17.2 PAGES

17.2.1.5.2 Supervisor - Audits | 6

The Supervisor - Audits supports the Director by auditing Nuclear Generation units implementing the QA program, including other NQA groups and their activities, performing surveillances, training coordination within Nuclear QA; and by ensuring the content and adequacy of quality program requirements addressed in the Fermi ~~Management Policy and Directives~~ CONDUCT Manuals. | 6

The Supervisor - Audits and staff also evaluate audit results and conduct audits of any onsite architect/engineer (A/E) activities. | 6

17.2.1.5.3 Supervisor - Procurement Quality Assurance

The Supervisor - Procurement Quality Assurance and staff support the Nuclear Generation units involved in the procurement activity by providing the necessary QA functions. Their principal duties include supplier audits, audits and surveillances of the procurement process, source surveillance and commercial grade surveys, and maintenance and issuance of an approved suppliers list. The Supervisor - Procurement Quality Assurance and staff also function to support Plant Engineering. Their principal duties include the review of selected engineering related documents. They also perform audits and surveillances of onsite and offsite engineering organizations including contractors. | 6

17.2.1.6 Director - Nuclear Training

The Director - Nuclear Training is responsible for developing and implementing training programs in support of the safe and efficient operation of the plant. | 6

The training program is described in Section 13.2.

17.2.1.7 Manager - Administration | 6

The responsibilities of the Manager - Administration are described in Subsection 13.1.1. Reporting to the Manager - Administration is the Director - General Purchasing. | 4

Inspection and Delivery Services - General Purchasing

The Inspection and Delivery Services group within the General Purchasing Department may assist Nuclear Generation by providing qualified personnel to perform vendor surveillance and source inspections under the direction of Supervisor - Material Engineering and Support. | 6

17.2.1.8 Review and Audit Organizations | 6

The membership, meeting frequency, minutes, quorum, and other details of the NSRG and the OSRO are described in this subsection and in Section 13.4. These review and audit organizations, which provide a technical review of plant maintenance and operation, have been established in accordance with the Technical | 1

g. No alterations are made to the facility which constitute a change from the current Technical Specifications except as allowed by 10 CFR 50.54(x) and (y) under emergency conditions. Other necessary alterations are made only after formal revision to the Technical Specifications.

The Fermi ~~Management Policy and Directives~~ CONDUCT Manuals, approved and made mandatory by management, ~~are~~ ARE the chief means of communicating the policies, goals, and objectives stated above to Nuclear Generation. Indoctrination sessions will also aid in furthering understanding. See Subsection 17.2.2.7 for further details.

17.2.2.2 Program Documentation

The Nuclear QA program is described IN THIS SECTION OF THE UFSAR (17.2) AND IS SUPPORTED BY FERMI CONDUCT ~~in portions of the Fermi Management Policy and Directives~~ Manuals and implementing procedures. THIS QUALITY ASSURANCE PROGRAM DESCRIPTION (QAPD) AND CHANGES THERETO SHALL BE APPROVED BY THE SENIOR VICE PRESIDENT-NUCLEAR GENERATION AFTER REVIEW BY THE DIRECTOR, NUCLEAR QUALITY ASSURANCE

17.2.2.2.1 Fermi ~~Management Policy and Directives~~ CONDUCT Manuals

The Fermi ~~Management Policy and Directives~~ CONDUCT Manuals address~~es~~ the QA program and other programs associated with the operation, maintenance, and modification of Fermi 2 and ~~for~~ the activities of support organizations. THESE CONDUCT MANUALS ARE ORGANIZED BY FUNCTION AND ARE DIVIDED INTO CHAPTERS WHICH REPRESENT ADMINISTRATIVE IMPLEMENTING PROCEDURES.

Fermi ~~Management Policy and accompanying Fermi Management Directives~~ CONDUCT MANUALS are endorsed by Edison management IN MANAGEMENT POLICY STATEMENT and reflect commitments to meet the applicable regulatory requirements for safe operation, as well as provide for ensuring reliability of operation. ~~This policy and accompanying directives~~ THESE CONDUCT MANUALS are approved by Fermi management and are the basis for the overall management program for Nuclear Generation. ~~The~~ Fermi ~~Policy and Directives~~ CONDUCT Manuals ~~is~~ ARE also applicable, as appropriate, to other Edison departments, suppliers, and contractors who furnish materials, equipment, or services that can affect the safe and reliable operation of Fermi 2.

Fermi ~~Management Directives establish~~ CONDUCT MANUALS IDENTIFY the requirements AND IMPLEMENTING PROCEDURES that management has mandated to be followed. ~~Those directives~~ CONDUCT MANUALS applicable to the QA program describe responsibilities and principal duties for the performance of specific quality-related activities and the QA requirements applicable to those activities. THESE

~~These directives provide for the implementation of quality-related requirements by requiring implementing procedures when necessary to carry out activities.~~ FERMI CONDUCT MANUALS ~~These directives~~ are approved by ~~the Senior Vice President - Nuclear Generation~~ THE PLANT MANAGER after review by ~~the Director - Nuclear Quality Assurance, and by~~ the management of ~~other~~ affected organizations.

~~Nuclear QA is responsible for ensuring that quality program requirements are described in appropriate portions of the~~ CONDUCT ~~manuals~~. ~~The~~ Manuals ~~is a~~ ARE controlled documents and ~~is~~ ARE handled as

described in Subsection 17.2.6. Revisions will be made, as appropriate, and will be subject to the same review and approval required for the original issue. Controlled copies of the manual are issued to identified personnel. Holders of the manual are required to keep it updated as revisions are issued and to be familiar with its applicable contents.

A matrix showing the 18 criteria of 10 CFR 50, Appendix B, and the ~~the policy and directives and organizational procedures~~ MANUALS implementing these criteria is shown in ~~Table 17.2-1~~ THE QA CONDUCT MANUAL (QA REGULATORY GUIDES AND ENDORSED ANSI STANDARDS,

~~17~~.2.2.2.2 Implementing Procedures

Implementing procedures delineate how each onsite quality-related activity is to be performed. These are prepared by Nuclear Generation units and approved by appropriate levels of management. The implementing procedures are reviewed either directly or during audits and surveillances by Nuclear QA personnel to ensure correct inclusion of QA requirements as defined by the Fermi Management Policy and Directives Manual. QA procedures are developed by the responsible groups in Nuclear QA and are approved by the Director - Nuclear Quality Assurance. | 6 | 4

17.2.2.2.3 Startup Manual

Edison developed a Startup Manual which described the organizations, responsibilities, and procedures for the performance of tests during the checkout and initial operations through power ascension testing. The Startup Manual was prepared by the Startup Test Phase Group - Nuclear Production and was reviewed by involved organizations and approved by the Plant Manager.

17.2.2.3 Program Elements

The Nuclear QA program ~~defined~~ IMPLEMENTED in the Fermi ~~Management Policy and Directives Manual~~ CONDUCT MANUALS has the following major elements:

a. Definition of responsibility and authority of those involved in the implementation of the QA program during maintenance, modification, and operation of the plant

b. Identification of items and activities covered by the program and the extent of the applicability of the program, based on the safety-related importance of the item or activity

c. Verification and documentation of quality by personnel with sufficient independence and organizational freedom to effectively control quality

d. Performance of activities affecting quality in accordance with written instructions, procedures, or drawings

problems involving the welding process, the Welding Engineer is the arbiter. Disputes involving operating procedures that cannot be resolved with the responsible organization are to be referred to the OSRO for resolution. In the event the OSRO and the Plant Manager are in disagreement, resolution shall be obtained as described in the Technical Specifications. Disputes on QA program requirements specified in the Fermi ~~Management Policy and Directives~~ Manuals are to be referred through the Director - Nuclear Quality Assurance to the Senior Vice President - Nuclear Generation. Conduct 6

17.2.2.7 Indoctrination and Training of Personnel

Personnel whose responsibilities and duties involve quality-related activities will participate in formal indoctrination and training programs conducted by Nuclear Training. These programs, in conjunction with training provided within the plant organizations, are designed to make personnel knowledgeable of the requirements of the Nuclear QA program, including purpose and scope, and the implementing procedures applicable to their work.

Periodic reviews will be scheduled to maintain a high level of understanding and knowledge of the Nuclear QA program. Special training sessions will be established for personnel requiring specialized skills in the performance of their work. The proficiency of such personnel will be established by appropriate examination, reexamination, and certification as required by codes, standards, and regulations. Files for formal training programs will include the objective, the content of training, the list of attendees, the date of attendance, and records of satisfactory completion. See Subsection 13.2.1 for further details. 6

17.2.2.8 Regulatory Guides and ANSI Standards

The operational QA program is intended to comply with the requirements of 10 CFR 50.55a, Part g; 10 CFR 50, Appendix B; and appropriate regulatory guides as addressed in Appendix A. The program is structured and implemented in accordance with ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," the ANSI standards referenced therein, and the regulatory guides that endorse them as addressed in Appendix A. ~~In addition, the preoperational and startup test programs are conducted in accordance with the guidance provided in Regulatory Guide 1.68 as addressed in Subsection A.1.68.~~

Those structures, systems, and components that are addressed by regulatory guides endorsing American Society of Mechanical Engineers (ASME) codes are described in Section 3.2.

17.2.3 Design Control

Plant Engineering is responsible for the engineering scope of modifications to plant structures, systems, and equipment. Design 6

documents (e.g., drawings, calculations, specifications, procedures, and instructions) originating from or released for review by this group will contain the required regulatory requirements, quality standards, and design bases in accordance with NRC licensing requirements. Design activities may include calculations, analysis, materials selection, equipment arrangement and layout, and specification of test and inspection criteria essential to the safety-related functions of structures, systems, and components. Those design activities performed by individuals within Edison organizations are controlled by ~~departmental~~ design control procedures.

Design control procedures satisfy the applicable QA requirements for design activities as specified in ANSI N45.2.11-1974 and as modified by Regulatory Guide 1.64 as addressed in Subsection A.1.64. Any organization performing design work for Edison must have similar requirements in its procedures before its QA program can be accepted.

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To ensure that the design is adequate and that the above requirements and procedures are satisfied, designs are internally verified by the originating organization. This internal verification of adequacy may be accomplished either by a design review, by alternative calculation methods, or by the establishment of a suitable test program. Where a test program is used to verify the adequacy of a specific design feature in lieu of other verification or checking processes, it will include suitable qualification testing of a prototype unit under the most adverse design conditions. Those proposed changes in the facility which involve changes to the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2) shall also be reviewed by NSRG. Minutes of each NSRG meeting are prepared and approved.

All documentary material reviewed is identified. Copies of minutes are distributed to the originating organization.

During the design reviews, particular attention will be given to ensure that

a. Appropriate quality standards are contained in the documents and clearly delineated

b. The technical information for the materials, components, equipment, and processes is contained in the documents and is suitable for the intended applications. This information will include, as applicable, the physics,seismic, radiation, hydraulics, thermal, strength, and accident analyses used; the compatibility of design for inservice inspection, maintenance, and repair; and the acceptance criteria for inspections and tests. Performance history and failure data on installed components will be considered when similar components are intended for installation as part of a system or structure modification

c. Design interfaces, when more than one organization has participated in the design, are compatible and consistent with the overall design bases and existing systems

d. In the selection of standard commercial or previously approved items with safety-related functions, a review is performed to determine if the characteristics of the item satisfy the requirements of the application

e. The inspection requirements per Subsection 17.2.10 are included and adequate

f. Errors and deficiencies discovered in the design as a result of the reviews are documented and disposition is assigned. A feedback system of corrective action, by distribution of the review comments to the responsible organization, is used to prevent repetitive errors or deficiencies in the design process.

Changes to the basic documents, including field changes as a result of modifications, which affect the technical adequacy of the design, will receive reviews and approvals comparable to the original basic documents. Editorial changes may be made with the approval of the responsible Plant Engineering Supervisor or other designated persons. Copies of editorial changes will be routed to the participating design organization and the Plant Support organization. | 6 | 6

17.2.4 Procurement Document Control

17.2.4.1 General

Design documents are used in the procurement of plant materials, equipment, and services to properly define the technical and quality requirements for each procured item. Procurement packages are prepared or initiated by the responsible individual in accordance with established purchase requisition procedures. | 6

The procurement package originator is responsible for ensuring that the applicable specifications, drawings, test requirements, inspection requirements, special process requirements, codes, standards, and regulatory requirements for safety-related items are specified or referenced in the procurement documents. The procurement packages are reviewed by Material Engineering and Support to ensure (or provide) inclusion of appropriate technical, QA, and documentation requirements, Edison's right of access, and the control of nonconformances. | 6

The procurement document planning, preparation, review, approval, and control process is performed in accordance with procedures prepared ~~and issued~~ by the responsible organizations. Procurement document control procedures require that changes to procurement documents be subject to the same controls as the original document. Procurement document control procedures satisfy

applicable QA requirements described in ANSI N45.2.13-1976 as modified by Regulatory Guide 1.123 as addressed in Subsection A.1.123.

The provisions which ensure that procurement documents contain Edison's right of access to supplier's facilities and records for source inspection and audits are delineated in the Fermi Conduct Manuals ~~Management Directives~~.

17.2.4.2 Procurement of Commercial Quality Items

Procurement of safety-related equipment, parts, and materials at Fermi 2 is in compliance with the plant's design requirements and commitments and is consistent with 10 CFR 50, Appendix B. These items may on occasion be procured commercial quality as replacements in safety-related systems. The criteria used for these commercial-quality procurements are consistent with the definition of commercial-grade items for use in safety-related systems contained in 10 CFR 21.

Safety-related items procured as Commercial Quality require specific engineering evaluations to establish engineering criteria and verification requirements prior to hardware acceptance. The development of engineering criteria includes critical performance characteristics and environmental and seismic requirements. Critical performance characteristics evaluate the item's form, fit, and function. Environmental requirements evaluate humidity, temperature, pressure, and radiation fields in which the hardware is expected to function under normal and accident conditions. Seismic requirements necessitate a need to evaluate the items for operation during and after a seismic event. Verification requirements are developed to ensure that established critical performance characteristics and environmental and seismic requirements are met.

Verification of product quality may be accomplished by sampling. The verification process includes visual inspection, analysis/justification, or testing, either nondestructive or destructive, before release for installation. Other methods that can be used include commercial grade survey of the supplier or source verification. Commercial grade surveys will not be employed as the basis for accepting items from suppliers with undocumented commercial quality control programs or with programs that do not effectively implement their own necessary controls. Commercial grade surveys will not be employed as the basis for accepting items from distributors unless the survey includes the part manufacturer(s) and the survey confirms adequate controls by both the distributor and the part manufacturer (s). Surveys are led by Nuclear QA personnel. Under certain circumstances, equipment, parts, or materials can be verified by post installation testing.

Other verification activities are performed at the direction of Fermi 2 Material Engineering and Support and overseen by Nuclear Quality Assurance in accordance with the Fermi 2 Quality

Assurance Program with the exception that some source verifications are performed by QA. 5

Documentation resulting from engineering evaluations and hardware verifications is designed to be auditable and become permanent plant procurement records. It may also be used to replicate generic or specific engineering evaluations during subsequent procurements.

Nuclear QA will ensure that such requirements are included in the detailed procedures. Independent audits by Nuclear QA will ensure compliance with the established procedures.

17.2.5 Instructions, Procedures, and Drawings

Activities affecting quality are performed in accordance with approved instructions, procedures, or drawings. These documents include the necessary limits and tolerances on materials, equipment, processes, and procedures for all activities from design through operation. Also included are qualitative or quantitative acceptance criteria to ensure that important operations have been accomplished satisfactorily. The basis for determining the need for procedures and their content is consistent with the requirements of ANSI N18.7-1976 and Regulatory Guide 1.33 as addressed in Subsection A.1.33.

Documents established to ensure that activities affecting quality are accomplished in accordance with applicable codes, standards, specifications, and drawings include the following:

a. Fermi ~~Management Policy and Directives~~ CONDUCT MANUALS, INCLUDING ADMINISTRATIVE IMPLEMENTING PROCEDURES AND NQA PROCEDURES
~~b. Administrative procedures~~
b. ~~c. NQA procedures~~ TECHNICAL PROCEDURES, INCLUDING BUT NOT LIMITED TO:
~~d.~~ Operating procedures, ~~including~~ Radiation Protection PROCEDURES 6
~~e.~~ Maintenance ~~procedures~~ AND MODIFICATION PROCEDURES, PERIODIC CALIBRATION &
~~f.~~ Test procedures, SPECIAL TEST PROCEDURES, AND FUEL HANDLING PROCEDURES.

Nuclear Generation unit supervisors are responsible for ensuring compliance to procedures by personnel under their direction. Independent auditing by Nuclear QA will further ensure and verify onsite compliance with the approved procedures. The activities of Edison support organizations and vendors or contractors are also audited by Nuclear QA to verify compliance with requirements. 2

17.2.6 Document Control

Documents defining the performance of quality-related activities are controlled to ensure that only current and correct information is used at the work location. Such documents include, but are not limited to, the following:

a. Design specifications, calculations, and analyses
b. Design, manufacturing, and construction drawings
c. Procurement documents

d. Fermi ~~Management Policy and Directives~~ CONDUCT MANUALS
e. ~~NQA procedures~~ TECHNICAL PROCEDURES
~~f. Operating procedures~~
~~g. Periodic test procedures~~
~~h. Special test procedures~~
~~i. Administrative procedures~~
~~j. Maintenance and modification procedures~~
~~k. Fuel-handling procedures~~
l. Nonconformance and design-change documents.

Such documents are drafted, reviewed, and approved by appropriate individuals or groups to ensure that the documents are adequate and that they include appropriate quantitative or qualitative acceptance criteria for determining that prescribed activities have been accomplished satisfactorily. Nuclear QA reviews such documents either directly or by audits and surveillances as appropriate for the type of document to ensure the inclusion of QA program requirements. The appropriate review and approval process is described in administrative procedures. The issuance of approved documents is made in accordance with established distribution lists.

Changes to such documents will meet the same requirements as the original document and will be reviewed and approved by the same organizations that performed the original review and approval, unless this responsibility is specifically delegated by these organizations to another qualified responsible organization.

Supervisors are responsible for ensuring that the correct revisions of necessary documents are being used to accomplish work.

During inspection, surveillance, and audit activities, Nuclear QA will verify that required documents such as drawings, specifications, instructions, or procedures are available at the work location.

6 The Director - Plant Support is responsible for maintaining and making available a document control system that identifies the current revision of procedures, specifications, drawings, procurement documents, and other such quality-related documents. The requirements for retaining and storing the quality-related documentation required above and other historical records are described in Subsection 17.2.17.

17.2.7 Control of Purchased Material, Equipment, and Services

Individuals designated by procedure approve the placement of contracts based on the analysis and recommendation of the
6 appropriate Nuclear Generation organizational units. The evaluation of the QA capabilities of such vendors and contractors is the responsibility of Nuclear QA.

6 Plant Support is responsible for supplier selection and bid evaluations. Requisitions are routed to the Supervisor -

TABLE 17.2-1 THE 18 CRITERIA OF 10 CFR 50, APPENDIX B, AND IMPLEMENTING ORGANIZATION PROCEDURES

Criterion	Subject	Fermi Management Policy and Directives	Nuclear Assurance Procedures	Nuclear Quality Assurance Procedures	Technical Engineering Procedures	Plant Engineering Procedures[2]	Nuclear Operations Procedures[3]	NSRG Procedures	Fermi Interface Procedures[4]
I	Organization	X	X	X		X	X	X	
II	QA Program	X							X
III	Design Control	X				X			X
IV	Proc. Doc. Control	X	X						X
V	Inst. Proc. Dwgs.	X		X			X		X
VI	Document Control	X							X
VII	Cont. Purch. Matl.	X	X	X		X			X
VIII	Ident./Cont. Matl.	X	X				X		
IX	Special Processes	X			X		X		X
X	Inspection	X		X		X	X		X
XI	Test Control	X	X			X	X		
XII	Cont. of M&TE	X					X		
XIII	Hdlg., Stor., Shpg.	X	X				X		X
XIV	Status Indication	X	X				X		X
XV	Nonconformances	X	X						X
XVI	Corrective Action	X							X
XVII	Records	X							X
XVIII	Audits	X		X					X

[1] Includes maintenance, modification, training, and OSRO.

[2] Includes QA organization as well as other nuclear organization responsibilities.

[3] Includes Material Engineering

DELETE