BOSTON EDISON COMPANY
800 BOYLSTON STREET
BOSTON, MASSACHUSETTS 02199

October 4, 1984
BECo. 84-168

WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

Mr. Domenic B. Vassallo, Chief
Operating Reactors Branch #2
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

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

Revised Response to Item 2.2.1.4 of Generic Letter 83-28

Dear Sir,

By letter of November 7, 1983, Boston Edison responded to requests made by the NRC in Generic Letter 83-28. Among those items responded to was item 2.2.1.4, which concerned management controls used to verify that the procedures for preparation, validation and routine use of the information handling system have been followed.

At the time of that response, documents designated both "Q" and "Non-Q" were reviewed by the Boston Edison Quality Assurance Department (QAD). However, the strengthening of the QAD surveillance monitoring function has eliminated the need for QAD review of "Non-Q" documents. The Boston Edison Quality Assurance Manual (BEQAM) has been amended to reflect this change.

To reflect this change to response 2.2.1.4, we have prepared an amended response whi h follows. Please substitute this for our response of November 7, 1983.

2.2.1.4 The Boston Edison Quality Assurance Program is defined in the Boston Edison QA Manual, Volume II. The BEQAM requires that structures, systems, and components designated safety-related, and other items for which the Vice Presidents agree to use the QA Program management controls, be identified on the Q-List. The Q-List is the "information handling system" referred to in NUREG 1000. The BEQAM requires that the Q-List be established and maintained by the Nuclear Engineering Manager.

The Nuclear Engineering Manager implements this responsibility through NED Procedure 6.07, "Maintaining the Q-List." The Q-List is controlled, and the latest revision is distributed to the locations of use.

Each originating department is responsible to properly classify documents as Q (QA Program applies) or Non-Q. Areas documented included proposed plant modifications, procurement, and work implementation (Maintenance Requests).

A055
1/0

The QAD performs random surveillance monitoring and periodic scheduled audits of all QA Program related activities. The preparation, validation, and routine use of the Q-List is within the scope of these inspections and audits. Details of these functions are as follows:

1. Periodic Audits

Planned periodic audits are performed to verify that procedures for preparation, validation, and routine use of the Q-List have been followed and are effective. These audits are performed by qualified personnel not having responsibilities in the areas being audited and using written checklists according to QAD Procedure 18.01. Audit results are documented and reviewed by management, and follow-up action on deficient areas is taken.

The following details auditing activities related to the Q-List that have been performed and will continue to be performed in the future:

Audit Nos. 82-3 and 82-23 - "Design Control" evaluated the adequacy of management controls defined in Nuclear Engineering Department procedures for the initiation, review and approval, and control of changes to the Q-List. In addition, these audits assessed the effectiveness of implementation of these controls and that performance of these activities are supported by appropriate documentation.

Specifically, QA audits evaluated the entire Q-List update process to assure that:

- Required changes are forwared (via a Drawing Revision Notification (DRN), Request for Q-List Revision (RQR), Plant Design Change Bill of Materials, etc.) to the Systems & Safety Analysis (S&SA) Group which has the responsibility for maintaining the Q-List.
- An index is maintained by the S&SA Group of requested changes received.
- Requested changes are reviewed and approved by appropriate personnel for inclusion in a Q-List revision.
- The Q-List is updated, as required, to reflect approved Q-List changes.

Audit No. 83-11 "Procurement Process" evaluated the use of the Q-List. Specifically, procurement documents were reviewed to assure that the Quality Category designation indicated on the procurement document correctly reflects what is indicated in the Q-List.

Audit No. 83-9 "Corrective Action" - The dispositions of Nonconformance Reports (NCR's) were reviewed and bounced against the Q-List (e.g., the disposition may be based on something being outside the pressure boundary - the Q-List would be reviewed to assure this was the case).

Audit 83-21 "Maintenance" included a review of Maintenance Request (MR) forms to assure that Q-List numbers are indicated as required.

The QA Department schedule for performance of required audits ensures that those Q-List related activities will be verified as being performed in the future.

2. Surveillance Monitoring Activities

Surveillance monitoring activities are performed according to Quality Assurance Department Procedure (QADP) 18.04 in support of, and as supplements to, audits to provide quality assurance coverage of operations activities. Surveillance monitoring probes/specific elements of plant in-process functions in order to verify compliance with operations related procedures. Such surveillances also serve as a follow-up mechanism to verify corrective action on deficiencies identified during auditing activities.

The Monthly Surveillance Schedule is based upon:

1. The frequency and depth of the surveillance commensurate with the quantity and difficulty of work/tests in progress, and the activities' safety significance.

2. Changing plant operating conditions.

3. Trends observed during previous surveillances and other activities such as audit results, LER's, INPO reports, and reports of outside agencies such as the U. S. Nuclear Regulatory Commission.

Surveillance Monitoring Activities are planned and unplanned, selective and random, and with sufficient detail to effectively monitor and report the conditions at the Pilgrim Nuclear Power Station. The scope of monitoring includes verification that procedures for preparation, validation, and routine use of the Q-List have been followed.

Very truly yours,

J E Howard for

W.D. Harrington

PMK/ns

cc: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Regulatory Commission
Washington, D. C. 20555