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October 3, 1984

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Mr. James G. Keppler
Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Submittal of Changes Pursuant
to 10CFR50.55(f)

Dear Mr. Keppler:

As required by 10CFR50.55(f), and in accordance with your letter of August 6, 1984, The Cleveland Electric Illuminating Company submits the changes to the quality assurance program description which have been made since June 2, 1983, the date on which the program description was submitted to you. None of the changes reduce commitments in the program description. Also submitted are the changes which were made between March 11, 1983 (the date specified in 10CFR50.55(f) (3)), and June 2, 1983. None of these changes reduce commitments in the program description.

In this connection we would note that during inspections conducted at Perry on April 4-8, April 13-15, May 10-13, and June 15, 1983, a side-by-side comparison of the Corporate Nuclear Quality Assurance Program (CNQAP) Manual was made between the original 1978 document (Revision 0) and all subsequent revisions. The resulting Inspection Report No. 50-440/83-13; 50-441/83-12 found that, except for changes in Section 0200 of the Manual, there had been no significant reduction in program controls. Section 0200 was subsequently revised (Program Revision Notice dated October 27, 1983) to remove the inspectors' concerns. See Inspection Report 50-440/83-25; 50-441/83-24. Based upon these Inspection Reports, we believe that CNQAP as reviewed by your inspectors establishes the appropriate baseline for the quality assurance program description.

In June 1983, Revision 5 of CNQAP Section 0200 added to Article 1.7.1 the requirements of 10CFR50.55(f) (3) to inform the NRC within 90 days of changes to the quality assurance program description which do not reduce commitments in the program description. Through a misinterpretation of the regulations, this article was revised in November 1983 to conform to 10CFR50.54(a) (3), which requires an annual submittal of changes in the quality assurance program descriptions of operating licensees. The error was detected during preparation of this submittal and promptly corrected. Mr. C. Shuster, Nuclear Quality Assurance Manager, discussed this matter with Mr. F. Hawkins of your office on September 18, 1984.

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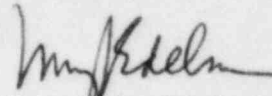
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October 3, 1984

A complete summary of changes made after March 11, 1983, is given in Attachment 1. Part A of Attachment 1 summarizes those changes made within the two-month period between the commencement of the NRC inspections noted above and our submittal of the quality assurance program description to Region III on June 2, 1983. Part B of Attachment 1 summarizes those changes made between June 2, 1983, and the present date.

This submittal fulfills the requirements of 10CFR50.55(f) to report changes to the QA program description. If you need further information, please contact Mr. C. Shuster, Manager, Nuclear Quality Assurance Department, or Mr. B. Walrath, General Supervising Engineer, Operational Quality Section, at the Perry site (216) 259-3737.

Very truly yours,



Murray R. Edelman
Vice President
Nuclear Group

MRE/BDW:ajs

cc: Jay Silberg, Esq.
John A. Grobe
John Stefano
USNRC Document Control Desk

Attachment 1 - Summary of QA Program Changes

SUMMARY OF QA PROGRAM CHANGESA. Summary of Changes to PNPP Construction Phase QA Program Made Between 3/11/83 and 6/1/83

1. Change: The Nuclear Group was created transferring overall project responsibility from the Vice President - System Engineering and Construction to the Vice President - Nuclear, and eliminating the position of Division Manager - Nuclear Engineering and Construction. Concurrently, the Cleveland Electric Illuminating Company (CEI) clarified its direct responsibility for construction management. These changes were reflected in the following sections of the CNQAP Manual:

Section 0100, Revision 8 (effective 3/14/83), Articles 1.3 (first paragraph); deletion of a paragraph between 1.3.2 and 1.3.3; 1.3.3 (first, third, fourth, ninth, tenth, twelfth, and deletion of a paragraph between the twelfth and thirteenth paragraphs); 1.3.4.1 (first paragraph); 1.3.4.1, II (first and second paragraphs); 1.3.4.1, II, A (title, and second, third and fourth paragraphs); and 1.3.4.1, III (fifth paragraph); Section 0200, Articles 1.1 (third paragraph) and 1.6 (first paragraph); Section 0300, Articles 1.1 (second paragraph), 1.2.2 (first paragraph), 1.2.3 (first and third paragraphs), 1.2.4, 1.2.5 (second paragraph) and 1.3 (first paragraph); Section 0400, Articles 1.2 (first paragraph) and 1.3 (first paragraph); Section 0600, Articles 1.2 (second paragraph) and 1.3 (second paragraph); Section 0700, Articles 1.2 (first paragraph), 1.2.1 (subparagraphs a, b and c); Section 0800, Article 1.3 (first paragraph); Section 0900, Article 1.3 (first paragraph); Section 1100, Articles 1.2 (fifth paragraph) and 1.3 (first and second paragraphs); Section 1200, Articles 1.2 (second paragraph) and 1.3 (first paragraph); Section 1300, Articles 1.2 (first paragraph) and 1.3 (first, second, fourth and sixth paragraphs); Section 1400, Article 1.2.1 (subparagraph d); Section 1500, Article 1.3 (eight paragraph); Section 1700, Article 1.3 (first and fifth paragraphs); and Section 1800, Article 1.2 (second paragraph, subparagraph a).

Reason: This change was made to focus corporate nuclear responsibilities.

Basis: This change represented no reduction in commitment.

2. Change: The Nuclear Quality Assurance Department was reorganized creating a separate audit element and restructuring the Program Quality Section and the Training/Administration Section into the Operations Quality Section and the Procurement and Administration Quality Section. This change was reflected in revisions to the following sections.

Section 0100, Revision 8 (effective 3/14/83), Articles 1.3.4.1, III (third paragraph); 1.3.4.1, III, B, C and D (entire Articles); Section 0300, Article 1.2.2 (third paragraph); Section 0400, Article 1.2 (third paragraph); Section 0500, Article 1.3 (third, fourth and sixth paragraphs); Section 0700, Articles 1.2.2 subparagraph c, item 3) and 1.3 (third, fourth, fifth and sixth

2. Change: (cont'd)

paragraphs); Section 0800, Article 1.3 (second, third, fifth and sixth paragraphs); Section 0900, Article 1.3 (second, third, fifth and sixth paragraphs); Section 1000, Articles 1.2 (second paragraph), 1.2.1 (first paragraph), 1.2.2 (second paragraph), 1.2.3 (first paragraph), and 1.3 (second and fourth paragraphs); Section 1100, Articles 1.2 (third, fourth and sixth paragraphs), and 1.3 (fifth and sixth paragraphs); Section 1200, Article 1.3 (fourth, sixth and seventh paragraphs); Section 1300, Article 1.3 (sixth, seventh and eighth paragraphs); Section 1400, Article 1.3 (third and fifth paragraphs); Section 1500, Article 1.3 (second, third, fifth, sixth and tenth paragraphs); Section 1600, Article 1.3 (second, fourth and seventh paragraphs); Section 1700, Article 1.3 (third paragraph); and Section 1800, Article 1.3 (second, fourth, fifth, sixth and seventh paragraphs).

Reason: The Nuclear Quality Assurance Department was restructured to support the testing and operations phases, as well as create more independence for all audit functions.

Basis: This change represented no reduction in commitment.

3. Change: Added paragraphs seven and eight to Section 0100, Revision 8.

Reason: To address delegation of quality assurance and technical support functions to NUSAC and NUS, acting as agents for CEI.

Basis: This is not a reduction in commitment.

4. Change: Revision 8 to Section 0100, Article 1.3.4.1, IV modified by adding "after IC&R and acceptance/preoperational testing completion" to the first sentence following "from the time of turnover".

Reason: Editorial change to clarify the definition of jurisdictional transfer of completed systems/components to the operating organization.

Basis: This change represents no reduction in commitments.

5. Change: Perry Plant Department organization modified by making the Training Unit report directly to the Plant Manager instead of to the General Supervisor, Nuclear Services. This change is reflected in Revision 8 to Section 0100, Articles 1.3.4.1, IV, E (first and second paragraphs) and 1.3.4.1, IV, F.

Reason: To focus responsibility for training of operating personnel.

Basis: This change represents no reduction in commitment.

6. Change: Revision 8 to Section 0100, Article 1.3.4.1, II, C (second paragraph) revised.

Reason: Editorial change to more clearly define Test Procedure Review Committee (TPRC) responsibilities.

Basis: This change represents no reduction in commitment.

7. Change: Revised statement of organizational freedom and authority for the Quality Assurance organization in revision 5 to Section 0200, Article 1.2 (third paragraph, subparagraph d).
Reason: Clarification, changes are editorial in nature.
Basis: This change represented no reduction in commitment.
8. Change: Revision 5 of Section 0200, Article 1.3 (first paragraph), and Figure 1 added.
Reason: Clarificaion of the hierarchy of program documents.
Pasis: This change represented no reduction in commitment.
9. Change: Requirements for the Quality Assurance Advisory Committee charter changed from "...an approved charter addressing frequency, membership, and responsibilities" to "...an approved charter addressing membership, meeting frequency, authority and duties" in revision 5 to Section 0200, Article 1.4 (third paragraph).
Reason: Editorial change to clarify program requirements.
Basis: This change represented no reduction in commitment.
10. Change: Revision 5 of Section 0200, Article 1.5 (first paragraph), "shall" changed to "should".
Reason: Change was editorial in nature, with the intent still to resolve disputes at the lowest possible level.
Basis: This change represented no reduction in commitment.
11. Change: Revision 5 of Section 0200, Article 1.6 (subparagraphs a, b and c) "and certification" added after "qualification".
Reason: Clarification of requirement.
Basis: This change represented no reduction in commitment.
12. Change: Added Article 1.7.1 in revision 5 to Section 0200 for reporting changes to the NRC approved quality assurance program to the NRC.
Reason: To incorporate the requirements of 10CFR50.55(f).
Basis: This was a new commitment which did not reduce any previous commitments.
13. Change: Added that some FSAR changes are reviewed "with the NRC for their approval before acceptance as an SAR deviaiton." in revision 4 of Section 0300, Article 1.2.1 (third paragraph).
Reason: Editorial change to reflect existing practice.
Basis: This represented no reduction in commitment.

14. Change: Revision 5 of Section 0500, Article 1.1 (first paragraph).
The last sentence was revised.
- Reason: To clarify program requirements related to approval and training for implementing procedures and instructions.
- Basis: This change represented no reduction in commitment.
15. Change: "Shall review and approve those instructions, procedures and policies which delineate the program emthods of complying with" revised to "...shall review instructions and shall review and approve policies and procedures which delineate methods of complying with the requirements of the Manual and the criteria specified by 10CFR50, Appendix B," revision 5 of Section 0500, Article 1.2.1 (subparagraph c).
- Reason: Editorial change to clarify Nuclear Quality Assurance Department reviews and approvals since program methods are delineated in procedures and policies.
- Basis: This change represented no reduction in commitment.
16. Change: Subparagraphs i, j and k added in revision 5 to Section 0500, Article 1.2.1.
- Reason: Provide clarification by specifically including review, approval and issue criteria for vendor instruction manuals, procedure revisions and supplemental program documents such as Special Project Plans and Records Expediting Action Plans.
- Basis: This change represented no reduction in commitment.
17. Change: Revision 4 to Section 0700, Article 1.1 (first paragraph), revised last sentence and added a new last sentence.
- Reason: To clarify spare and replacement part program requirements and be consistent with the Operations QA Program as described in Chapter 17.2 of the FSAR.
- Basis: This change represented no reduction in commitment.
18. Change: Revision 4 to Section 0700, Article 1.2.1 (subparagraph d), expanded.
- Reason: Editorial change to clarify that both technical and quality assurance evaluations are required to qualify a supplier.
- Basis: This change represented no reduction in commitment.
19. Change: Revision 4 to Section 0700, Article 1.2.2 (subparagraph d, item 4) add "...if possible,...".
- Reason: Editorial change to make Section 0700 compatible with Section 1500 requirements for segregating nonconforming items.
- Basis: This change represents no reduction in commitment.

20. Change: Revision 4 to Section 0700, Article 1.2.2 (subparagraph e) and Revision 5 to Section 1800, Article 1.1.
- Reason: Clarification regarding use of results by industry cooperative evaluation, such as those conducted by the Coordinating Agency for Supplier Evaluation (CASE).
- Basis: This change represents no reduction in commitment.
21. Change: Revision 4 to Section 0700, Article 1.2.4 (subparagraph d).
- Reason: Editorial, changed from "communications procedures" to "correspondence control procedures".
- Basis: This change represents no reduction in commitment.
22. Change: Revision 5 to Section 0900, Articles 1.1 and 1.3 (first paragraph) modified.
- Reason: Addressed special processes used to control ASME Section XI repair and replacement activities.
- Basis: This change represents no reduction in commitment.
23. Change: Revision 3 to Section 1100, Article 1.1, added "...selected IC&R...".
- Reason: Clarification to address types of tests already included in the QA program.
- Basis: This change represents no reduction in commitment.
24. Change: Added commitment to ANSI N45.2.2 and Regulatory Guide 1.38 in revision 4 to Section 1300, Article 1.1.
- Reason: Clarification of a commitment incorporated in the program.
- Basis: This change represents no reduction in commitment.
25. Change: Records policy statements revised in revision 4 to Section 1400, Article 1.3 (sixth paragraph) and revision 4 to Section 1700, Articles 1.2.1 (subparagraphs a and b) and 1.2.2.
- Reason: Clarification, changes are editorial in nature.
- Basis: This change represented no reduction in commitment.
26. Change: Operating logs deleted from list of Construction Quality Assurance records in revision 4 to Section 1700, Article 1.2.3 (subparagraph b).
- Reason: Operating logs are not part of records collected during the construction phase.
- Basis: This is not a reduction in commitment. Operating logs are identified as quality assurance records in Chapter 17.2 of the FSAR.

27. Change: Revision 5 to Section 1800, Article 1.2 (fourth paragraph) added subparagraphs b and j.

Reason: Clarification to address all requirements of ANSI N45.2.12.

Basis: This change represented no reduction in commitment.

B. Summary of Changes to Construction Phase QA Program Made after 6/1/83

1. Change: CEI upper management was restructured as follows: the Senior Vice President retired; the President moved up to Chairman of the Board; the trustees elected a new President; and chief management responsibilities were split between the Chairman and the new President, the Chairman taking responsibility for company operations and the President for financial and administrative functions. As a result, the Vice President, Nuclear Group, now reports to the Chairman through the Executive Vice President instead of to the President through the Senior Vice President and the Executive Vice President.

In addition, two new administrative elements were formed: Cost and Schedules Section, reporting to the Vice President, Nuclear; and Community Relations Section, reporting to the manager, Perry Project Services Department.

These changes to the QA Program description are reflected in revision 9 to Section 0100 in Articles: 1.3.3 (first and seventh paragraphs, pages 2 and 3); 1.3.4.1 (page 4); 1.3.4.1, I, A (page 4); 1.3.4.1, I, B (page 5); 1.3.4.1, I, C (first paragraph, page 5); 1.3.4.1, II, A (first paragraph, page 6); 1.3.4.1, V (page 13-14); 1.3.4.2, I (page 15); and 1.3.4.2, I, E (page 16-17). Changes also are reflected in the organizational charts on page 18-19.

Reason: Organizational changes to support changing needs of the project and corporation.

Basis: This change represents no reduction in commitment.

2. Change: Organizational elements were renamed in Nuclear Design & Analysis Section (all elements); Nuclear Test Section (Administration & Scheduling changed to Administration & Planning); and Perry Project Services Department (Construction Buying Section changed to Procurement Section).

Revision 9 to Section 0100, Articles 1.3.4.1, I, A (page 4); 1.3.4.1, II, C (page 7); and 1.3.4.2, I, A (page 15).

Reason: Titles were changed to better reflect functions.

Basis: This change represents no reduction in commitment.

3. Change: Minor changes in wording were made to describe functions not previously mentioned specifically.

Revision 9 to Section 0100, Articles 1.3.4.1, I, C (page 6); 1.3.4.1, IV, D (page 13); 1.3.4.1, IV, E (page 13) and 1.3.4.2, I, A (page 15).

Reason: Clarification by identifying specific responsibility for functions previously implied.

Basis: This change represents no reduction in commitment.

4. Change: On site liaison and coordination of personnel functions with CEI corporate headquarters was reassigned to Nuclear Project Training Section instead of reporting directly to the Manager, Perry Project Services Department.

Revision 9 to Section 0100, Article 1.3.4.1, I, D (first paragraph).

Reason: Improved administration of CEI personnel functions.

Basis: This change represents no reduction in commitment.

5. Change: Project management was restructured as follows: The position of Vice President, Nuclear Operations was established, and made directly responsible for plant operations, plant engineering and design to support operations, and the Project training program. At this time, the Reliability and Design Analysis Section was created in Nuclear Engineering Department, and the Nuclear Project Training Section was renamed Perry Training Section and transferred from Perry Project Services Department to the newly formed Nuclear Operations Division. The System Completion Group was created in the Nuclear Construction Department, and the Nuclear Test Section was transferred from the Nuclear Construction Department to the Nuclear Operations Division. The Superintendent of Plant Operations, PPD, was given a special assignment to oversee test and start-up activities; for the duration of that assignment, he reports directly to the Vice President, Nuclear Operations.

In related moves, the role of Field Construction Administration (an element of Nuclear Construction Administration Section) was redefined to reflect a shift in Project emphasis from bulk construction to systems completion; responsibility for warehousing was transferred from Field Construction Administration to the Maintenance Section, Perry Plant Department; Perry Plant Department Training Unit was integrated into the Perry Training Section; responsibilities of Operational Quality Section were changed by adding review of Work Authorizations to the programmatic address of system completion/turnover activities; Nuclear Design & Analysis Section was reorganized into disciplines instead of activity-oriented elements; a System Engineering Response Team was established in ND&AS to provide design support for system completion/turnover; Administration & Special Projects Section was transferred from Nuclear Engineering Department to Perry project Services Department and renamed Procedures and Records Section; Records Control Unit was transferred from Facilities

5. Change: (cont'd)

and Services Section and integrated into Records Management Unit of Procedures and Records Section; and Data Systems was transferred from Perry Project Services Department to Information Services Department (a CEI corporate department) to make better use of computer expertise existing within the company.

These changes to the QA program description are reflected in Revision 10 to Section 0100 in Articles: 1.3.3 (first, third and seventh paragraphs, pages 2 and 3); 1.3.4.1 (first paragraph, page 4); 1.3.4.1, I (first and second paragraphs, page 4); 1.3.4.1, I, A (first, third and fourth paragraphs, pages 4 and 5); 1.3.4.1, I, C (entire Article, pages 5 and 6); 1.3.4.1, II, B (second paragraph, page 7); 1.3.4.1, IV (third paragraph, page 10); 1.3.4.1, IV, B (page 10); 1.3.4.1, IV, E (page 11); 1.3.4.1, V (page 11); 1.3.4.1, V, A (entire Article, pages 11 and 12); 1.3.4.1, V, B (page 12); 1.3.4.1, V, C (entire article added, pages 12 and 13); 1.3.4.1, VI (first and second paragraphs, page 13); 1.3.4.2, I (first paragraph, page 15); 1.3.4.2, I, A (entire Article, pages 15 and 16); 1.3.4.2, I, B (entire Article, page 16); 1.3.4.2, I, C (first, third and fourth paragraphs, page 16); and 1.3.4.2, III (entire Article, page 18).

Reason: Organizational change to support changing needs of the project.

Basis: These changes represented no reduction in commitment.

6. Change: Changes were made in revision 10 to Section 0100 to the following articles to correct organizational titles or to clarify relationships: 1.3.4.1, II (first paragraph - "organizational elements" changed to "departments") and (third paragraph - "Quality Audit Element" changed to "Quality Audit Unit"); 1.3.4.1, II, C (first sentence - "Quality Records and Administration/NRC Activities" changed to "Administration and Records"); 1.3.4.1, II, D ("Quality Audit Element" changed to "Quality Audit Unit"); 1.3.4.1, IV, C ("Plant Technical Section" changed to "Technical Section"); 1.3.4.1, VII (first and third paragraphs - "Administration and Scheduling" changed to "Administration/Scheduling").

Reason: Editorial corrections.

Basis: These changes represented no reduction in commitment.

7. Change: Revision 10 to Section 0100, Article 1.3.4.1, III (ninth paragraph).

Reason: Editorial changes to clarify Nuclear Quality Assurance Department's use of QA agents.

Basis: This change represents no reduction in commitment.

8. Change: Revision 10 to Section 0100, Article 1.3.4.1, III (first, second and fourth paragraphs, page 9).

Reason: Functions of Cost and Schedules Section were redefined and the Section was reorganized.

8. (cont'd)

Basis: This change represents no reduction in commitment.

9. Change: Title and organizational references to reflect changes made to Section 1 of the Corporate Nuclear Quality Assurance Program (CNQAP) Manual in Revisions 9 and 10 were made to other sections as outlined below:

Section 0200 (Revision 6, effective 6/4/84) - Article 1.6, first paragraph; Article 1.7, second paragraph.

Section 0300 (Revision 5, effective 6/11/84) - Article 1.3, second paragraph.

Section 0500 (Revision 6, effective 6/11/84) - Article 1.2; Article 1.3, second and sixth paragraphs.

Section 0600 (Revision 5, effective 6/4/84) - Article 1.2, second paragraph; Article 1.3, second paragraph.

Section 0700 (Revision 5, effective 6/4/84) - Article 1.2.1, subparagraphs a, b and c; Article 1.3, sixth and seventh paragraphs.

Section 0800 (Revision 5, effective 6/4/84) - Article 1.3, second, fourth and fifth paragraphs.

Section 0900 (Revision 6, effective 6/4/84) - Article 1.3, sixth paragraph.

Section 1100 (Revision 4, effective 6/25/84) - Article 1.3, first and ninth paragraphs.

Section 1200 (Revision 5, effective 6/11/84) - Article 1.3, first, second, third and sixth paragraphs.

Section 1300 (Revision 5, effective 6/11/84) - Article 1.3, first, sixth and eighth paragraphs.

Section 1400 (Revision 5, effective 6/11/84) - Article 1.3, seventh paragraph.

Section 1600 (Revision 5, effective 6/11/84) - Article 1.3, fourth paragraph.

Section 1700 (Revision 5, effective 6/4/84) - Article 1.3, fifth paragraph.

Section 1800 (Revision 6, effective 6/4/84) - Article 1.3, second, fifth and sixth paragraphs.

Reason: Reflection of organizational changes described in items 1 through 8 above.

Basis: These changes represent no reduction in commitment.

10. Change: Responsibilities were formally assigned for carrying out tasks related to preservice examination, and inservice examination and testing.

Section affected, and the location of specific revised wording that incorporates the change are as follows:

Section 0200 (Revision 6, effective 6/4/84) - Article 1.2, first paragraph (subparagraph f) and third paragraph (subparagraph c).

Section 0900 (Revision 6, effective 6/4/84) - Article 1.2, fourth paragraph.

Section 1000 (Revision 5, effective 6/25/84) - Article 1.1, second paragraph; Article 1.2, second paragraph; Article 1.2.3, first, second and third paragraphs; Article 1.3, second and fourth paragraphs.

Section 1100 (Revision 4, effective 6/25/84) - Article 1.1, second paragraph; Article 1.2, second, sixth and seventh paragraphs; Article 1.3, fifth, seventh and ninth paragraphs.

Section 1400 (Revision 5, effective 6/11/84) - Article 1.2.1, subparagraph d.

Section 1600 (Revision 5, effective 6/11/84) - Article 1.2, third paragraph, last line item in the Article.

Reason: Included requirements that address Section XI of the ASME Boiler and Pressure Vessel Code.

Basis: These changes represent no reduction in commitment.

NOTE: These changes were established by Program Revision Notices dated 11/7/83 and formally incorporated in the next subsequent revision to the affected Sections.

11. Change: Added a commitment to conduct an independent assessment of QA program effectiveness annually in Section 0200, Article 1.4, second paragraph.

NOTE: This commitment was established by Program Revision Notice dated 10/27/83 and was formally incorporated in Revision 6 to Section 0200.

Reason: Corrective action in response to Inspection 50-440/83-13; 50-441/83-12 (subsequently closed in Inspection 50-440/83-25; 50-441/83-24).

Basis: This change represents no reduction in commitment.

12. Change: Section 0200, Article 1.7.1 changed by substituting 10CFR50.54(a) for 10CFR50.55(f) as a reference and changing the requirement for submitting changes that do not reduce commitments for NRC review from 90-day notification to annual notification.

12. Change: (cont'd)

NOTE: This change was established by Program Revision Notice effective 11/14/83 and subsequently incorporated in revision 6 to Section 0200.

Reason: Compliance with NRC rule requiring NRC notification of changes to the quality assurance program description. This change erroneously made the requirements applicable to operating plants applicable to Perry's construction QA program. The error was identified and corrective action taken (see change 17).

Basis: This change was not intended to reduce commitments but the requirements were misinterpreted.

13. Change: Responsibility for reviewing procurement documents for professional services of consultants and agents was assigned to the Manager, Nuclear Quality Assurance Department vice the Procurement and Administration Quality Section.

NOTE: This change was established by Program Revision Notice effective 2/21/84, and formally incorporated in Revision 3 of Section 0400.

Reason: This change elevated QA reviewing level for professional service agreements due to their unique nature.

Basis: This change represents no reduction in commitment.

14. Change: Reference to "basic project documents" in the program description of document control measures changed to "designated project documents" in revision 5 of Section 0600, Article 1.2 (second paragraph).

Reason: Editorial change to clarify applicability of document control procedures.

Basis: This change represents no reduction in commitment.

15. Change: Revision 4 of Section 1100 - Article 1.2, fifth paragraph; Article 1.3, fourth paragraph.

Reason: Editorial change to clarify that acceptance tests for nonsafety systems are part of the overall test program.

Basis: This change represents no reduction in commitment.

16. Change: Reference to Regulatory Guide 1.58 revised to include both the August 1973 and September 1980 Revisions in revision 7 to Appendix I.

NOTE: This change was established by Program Revision Notice effective 11/7/83, and formally incorporated in revision 7 of Appendix I.

16. (cont'd)

Reason: Incorporate FSAR commitment to the September 1980 Revision. (Project Organization personnel are now being qualified to ANSI N45.2.6 - 1978; contractor personnel are being qualified as specified in procurement documents, which is generally ANSI N45.2.6 - 1973.)

Basis: This change represents no reduction in commitment.

17. Change: Section 0200, Article 1.7.1 corrected by substituting 10CFR50.55(f) for 10CFR50.54(a) as a reference, and changing the requirement for submitting changes that do not reduce commitments for NRC review from annual to 90-day notification.

NOTE: This change to Revision 6 of Section 0200 was established by Program Revision Notice effective 9/18/84. It will be incorporated as a page change at time of next formal revision of Section 0200.

Reason: Compliance with NRC rule for informing the NRC of changes to the quality assurance program description. This change corrects a misinterpretation of requirements, which is described in change 12.

Basis: This change brings the program into full compliance with 10CFR50.55(f).