

YANKEE ATOMIC ELECTRIC COMPANY

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1671 Worcester Road, Framingham, Massachusetts 01701

July 9, 1985
FYR 85-75
2.C.2.1

United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. John A. Zwolinski, Chief
Operating Reactors Branch No. 5
Division of Licensing

References: (a) License No. DPR-3 (Docket No. 50-29)
(b) Letter, USNRC to All Licensees, dated July 8, 1983
(Generic Letter 83-28)
(c) Letter, YAEC to USNRC, dated November 5, 1983 (FYR-84-09)
(d) Letter, YAEC to USNRC, dated January 13, 1984 (FYR 84-09)
(e) NUTAC Response on Generic Letter 83-28, Section 2.2.2,
"Vendor Equipment Technical Information Program," dated
March 1984
(f) Letter, Westinghouse to Westinghouse Owners Group, dated
September 15, 1983 (WOG 83-24)
(g) Letter, USNRC to YAEC, dated April 9, 1985 (NYR 85-69)

Subject: Generic Letter 83-28, Request for Additional Information

Dear Sir:

Enclosed is our response to Reference (g), request for additional
information, as noted below.

We have reviewed your request for additional information [Reference (g)],
Item 2.2.2.(a), and our Vendor Equipment Technical Information Program. We
consider that our Vendor Equipment Technical Information Program, which
utilizes Reference (e) as a model, is a valid response to Reference (b),
Section 2.2.2.

Yankee actively participated in the NUTAC on Generic Letter 83-28,
Section 2.2.2, Vendor Equipment Technical Information Program. The findings
of this committee, its approach and its position are described in Reference
(e). Yankee endorses this approach as a realistic program which is attentive
to nuclear safety and is achievable. This program is considered an acceptable
program which meets the intent and objectives of Generic Letter 83-28,
Section 2.2.2.

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United States Nuclear Regulatory Commission
Attention: Mr. John A. Zwolinski

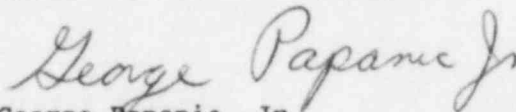
July 9, 1985
Page 2

A compilation of all our previous responses to Reference (b), Section 2.2.2 [including clarification of Reference (g), Item 2.2.2.(b), minor changes and updates], is enclosed and replaces all our previous responses in this area.

We trust this additional information is satisfactory; however, if you have any questions, please contact us.

Very truly yours,

YANKEE ATOMIC ELECTRIC COMPANY

A handwritten signature in cursive script that reads "George Papanic, Jr.".

George Papanic, Jr.
Senior Project Engineer - Licensing

GP/gms

Enclosure

ENCLOSURE

YANKEE ATOMIC ELECTRIC COMPANY
RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION GENERIC LETTER 83-28

Item 2.2.2 Vendor Interface (Program for all Safety-Related Components)

NRC Position

2. For vendor interface, licensees and applicants shall establish, implement and maintain a continuing program to ensure that vendor information for safety-related components is complete, current and controlled throughout the life of their plants, and appropriately referenced or incorporated in plant instructions and procedures. Vendors of safety-related equipment should be contacted and an interface established. Where vendors cannot be identified, have gone out of business, or will not supply information, the licensee or applicant shall assure that sufficient attention is paid to equipment maintenance, replacement, and repair, to compensate for the lack of vendor backup, to assure reliability commensurate with its safety function (GDC-1). The program shall be closely coupled with Action 2.2.1 above (equipment qualification). The program shall include periodic communication with vendors to assure that all applicable information has been received. The program should use a system of positive feedback with vendors for mailings containing technical information. This could be accomplished by licensee acknowledgement for receipt of technical mailings. It shall also define the interface and division of responsibilities among the licensee and the nuclear and non-nuclear division of their vendors that provide service on safety-related equipment to assure that requisite control of the applicable instructions for maintenance work on safety-related equipment are provided.

YAEC Response

Yankee has actively participated in the NUTAC on Generic Letter 83-28, Section 2.2.2, Vendor Equipment Technical Information Program. The findings of this Committee, its approach and position are described in Reference (e). Yankee endorses the NUTAC approach as a realistic program which is attentive to nuclear safety and is achievable. This program is considered an acceptable program which meets the intents and objectives of Section 2.2.2 of Generic Letter 83-28.

The Vendor Equipment Technical Information Program (VETIP) at Yankee has been formalized and implemented as a procedure, AP-0075, Vendor Equipment Technical Information Program" (copy attached for information). This program utilizes the NUTAC program as a model and is tailored to Yankee's specific needs and requirements and consists of the following components.

- An Operational Information Review Program (OIRP) as described in our procedure, AP-0020, "Operating Information Review" (copy enclosed for information) assures that pertinent information received within and without the company is reviewed, assessed, distributed and acted upon by appropriate plant personnel. This program is established in response to NUREG-0737, Item I-C-5, Procedures for Feedback of Operating Experience to Plant Staff.
- Evaluations performed under AP-0020, Operating Information Review program procedure are tracked pursuant to our programmatic procedure, AP-0055, Open Items and Commitment Tracking (a copy is attached for information). Recommendations for improvement requiring changes in maintenance procedures, test requirements, or operating procedures that result from evaluations are entered on the follow system as appropriate. A cognizant department or party is assigned responsibility by management to revise appropriate procedures, documents, etc. This responsibility in conjunction with a due date is then entered into the Open Item and Commitment Tracking System, which currently is a computerized open item tracking system called PROCTR. These items are reviewed and tracked to completion pursuant to AP-0055, Open Item and Commitment Tracking. Periodically, reports on open items are distributed to cognizant department supervisors/managers. The Plant Superintendent is appraised of areas of concern to ensure appropriate and timely actions are implemented.
- A positive interface program has been implemented with Westinghouse, our Nuclear Steam System Supplier (NSSS) as described in Reference (f) (copy of cover letter plus applicable pages attached for information). This program will ensure that Yankee is kept abreast of the latest developments and problems disclosed by our NSSS. These bulletins are reviewed under our Operational Information Review Program.

In addition, Westinghouse forwarded a complete set of Westinghouse technical bulletins and data letters; thus, providing the plant with a complete, current and controlled set of equipment technical information bulletins and data.

- The Nuclear Plant Reliability Data System program reports issued on a periodical basis to the plant are retained for investigating, evaluating and checking of current problems associated with vendor products, as needed.
- The Significant Event Evaluation and Information Network See-in program reports (Significant Event Reports and Significant Operating Experience Reports) are appropriately reviewed under our Operation Information Review program described above. Applicable information is incorporated into appropriate procedures, drawings, etc., or placed under our document control system per AP-0075, VETIP.

- Vendors of safety-related equipment are and will be utilized for assistance when problems dictate that such direct interaction is necessary or would be beneficial to ensure that such equipment will operate or continue to operate in a safe manner.
- Equipment technical information received from sources such as USNRC I&E Bulletins, USNRC I&E Notices, USNRC Letter to YAEC, Nuclear Network Other Vendor Technical Information requiring evaluation, 10 CFR 21 Reports, etc., is reviewed under our current Operational Information Review Program procedure, AP-0020.
- Equipment technical information received from vendors through the procurement process is reviewed by the cognizant department and if appropriate, is incorporated into applicable procedures, drawings, etc., or placed under our document control system per AP-0075, VETIP.
- Administrative procedures require that a listing of reference material pertinent to the conduct of the procedure, manufacturing equipment specification, etc., be included in the applicable reference section of the procedure. Moreover, applicable procedures will be revised to clarify that this includes appropriate Vendor/Manufacturer Equipment Technical Information. These revision(s) will be completed as part of the scheduled biennial procedure review program in accordance with the Yankee Operational Quality Assurance Program (YOQAP-1-A). As the number of references increases, the program as presently established may be altered to maintain simplicity and reduce unnecessary procedure lengthiness. Traceability to necessary reference materials will be maintained.
- Vendor(s), contractor(s), or technical representatives who perform services on safety-related systems, components, structures shall be an approved/qualified supplier of such services or be specifically approved as described in our procedure, AP-0211, "Material and Service Review Procurement Program" (copy enclosed for information).
- Where vendors cannot be identified, have gone out of business or will not supply appropriate information, sufficient attention shall be paid to equipment maintenance, replacement and repairs to compensate for lack of vendor assistance to assure systems reliability commensurate with its safety function.

In addition the multitude of Technical Specification surveillance tests (channel calibrations, channel checks, channel functional test) and other plant surveillance provides an adequate basis to ensure that equipment is operating at a level commensurate with its importance to safety. These procedures are reviewed by management for indication of possible problems so that appropriate corrective action can be taken in a timely fashion.

The implementation of this program, coupled with Yankee's many years of successful operation during which the company has demonstrated its attentiveness to reactor safety and its capability to design, engineer, and maintain a safe operating plant will assure that safety-related system, components, and structures are maintained and operated with current information to ensure reliability commensurate with its intended safety function.

Item 3.1 Post-Maintenance Testing (Reactor Trip System Components)

NRC Position

3. Licensees and applicants shall identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which can be demonstrated to degrade rather than enhance safety. Appropriate changes to these test requirements, with supporting justification, shall be submitted for staff approval. (Note that action 4.5 discusses on-line system functional testing.)

Documentation Required

Licensees and applicants should submit a statement confirming that actions 3.1.1 and 3.1.2 of the above position have been implemented.

Technical Specification Changes Required

Changes to Technical Specifications, as a result of action 3.1.3, are to be determined by the licensee or applicant and submitted for staff approval, as necessary.

YAEC Position

The requirement of Generic Letter 93-28, section 3.1.3 did not require a response to item 3.1.3. However, a review was performed pursuant to this section. No Technical Specifications changes were identified.

Item 3.2 Post-Maintenance Testing (all Other Safety-Related Components)

NRC Position

3. Licensees and applicants shall identify, if applicable, any post-maintenance test requirements in existing Technical Specifications which are perceived to degrade rather than enhance safety. Appropriate changes to these test requirements, with supporting justification, shall be submitted for staff approval.

Documentation Required

Licensees and applicants should submit a statement confirming that actions 3.2.1 and 3.2.2 of the above position have been implemented.

Technical Specification Changes Required

Changes to Technical Specifications, as a result of action 3.2.3, are to be determined by the licensee or applicant for staff approval, as necessary.

YAEC Position

The requirements of Generic Letter 83-28, Section 3.2.3 did not require a response to item 3.2.3. However, a review was performed pursuant to this section. No Technical Specification changes were identified.

OPERATING INFORMATION REVIEW

FOR INFORMATION
ONLY

SCOPE

To assure that information pertinent to plant safety originating both within and outside the company is effectively and efficiently reviewed, evaluated, distributed and acted upon by appropriate plant personnel.

ENCLOSURES

AP-0020 - Pgs. 1-3 - Rev. 3
APF-0020.1 - Rev. 3

REFERENCES

1. NUREG 0737, Item I.C.5, Procedures for Feedback of Operating Experience to Plant Staff
2. NUREG 0660, Task I.C., Item 5, Procedures for Feedback of Operating Experience
3. 1984 INPO Evaluation of Yankee Nuclear Generating Station (Finding TS 3-1)

DISCUSSION

The objectives of this procedure are:

1. To identify organizational responsibilities for the review of information pertinent to plant safety. [1]
2. To define and track the course of action resulting from such reviews. [1]
3. To provide a mechanism for documenting that such actions are accomplished in an efficient and timely manner by appropriate plant personnel.
4. To ensure that plant personnel do not routinely review extraneous and unimportant information. [1]
5. To ensure that pertinent information is incorporated into procedures and training programs or forwarded for information and that conflicting information is not conveyed until resolution is reached. [1]
6. To provide requirements for periodic internal audits and independent checks of the review process to ensure its proper performance. [1][3]

An Evaluation Coordinator from the Technical Services Department will be assigned responsibility for the implementation, coordination, and performance of this procedure.

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The basic functions of the program are:

1. Screening of information to determine applicability to the plant and need for further evaluation.
2. Evaluation of information by an individual or group with experience in the subject area. This evaluation should address the adequacy of the plant's programs and/or equipment in view of the material being evaluated or make recommendations for improvement.
3. Feedback to plant staff to make operators and affected departments aware of important information.
4. Follow the evaluation and any actions required to their conclusions.

The following documents, as a minimum, will be handled by this procedure:

- a. USNRC I&C Bulletins
- b. USNRC I&E Information Notices
- c. USNRC Letters to YAEC
- d. INPO Significant Event Reports (SER)
- e. INPO Significant Operating Experience Reports (SOER)
- f. Bulletins, Reports and appropriate letters from vendors

PROCEDURE

A. Screening (initial evaluation)

1. The Plant Superintendent and/or Evaluation Coordinator will screen the above-listed documents. Notation of reason for initial evaluation should be made for documents which do not require further evaluation if that reason is not obvious.
2. Information requiring further evaluation will be processed per part B.
3. Information which does not require further evaluation will be routed to selected individuals or departments for information.
4. If the determination is made that a document placed in routing requires an evaluation, it will be forwarded to the Evaluation Coordinator with note of explanation and be processed per Part B.

5. Copies will be sent to Training and the Shift Technical Advisors if the document is applicable to plant operation.

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B. Evaluation

1. The Evaluation Coordinator will initiate APF-0020.1 and:
 - a. Assign one or more departments responsibility for evaluation.
 - b. Assign due date for completion of evaluation.
 - c. Enter information on Tracking System.
 - d. Forward document to department(s) assigned.
2. The responsible department will evaluate the information and submit the evaluation to the Evaluation Coordinator or Technical Director by the due date.

NOTE: If more time is required for evaluation, contact the Evaluation Coordinator for an extension.

3. The Technical Director will determine the adequacy of the evaluation, additional routings or review and any further action required and return the evaluation to the Evaluation Coordinator.
4. Completed evaluations will be forwarded to Administration for filing.

C. Follow and Feedback of Information

1. The Evaluation Coordinator maintains the status of documents requiring evaluation and actions resulting from the evaluation.
2. Feedback to plant staff is accomplished by selected routing and distribution prior to and/or after evaluation.
3. Feedback to operators is accomplished by the Training Department and Shift Technical advisors.

D. Program Audits

1. The Operational Quality Assurance Department performs an audit of the program on an annual basis.
2. A review of program effectiveness will be conducted on an annual basis.

EVALUATION OF OPERATING EXPERIENCE

Date: _____

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Responsibility for Evaluation: _____

Evaluation Due: _____

Document: _____

Related Material: _____

EVALUATIONS: Note: Use additional paper if necessary

_____ NOT APPLICABLE TO YANKEE (Provide justification)

_____ ADEQUATELY ADDRESSED AT YANKEE (Provide justification)

_____ RECOMMENDATIONS FOR CORRECTIVE ACTION

_____ OTHER

SIGNED: _____ DATE _____

APPROVED: _____ DATE _____
Technical Director

PORC REVIEW: NO _____ YES _____ Mtg. No. _____

ACTION REQUIRED _____

REVIEWED _____
Plant Superintendent

cc: Training
STA
Routing
TS

OPEN ITEMS AND COMMITMENT TRACKING

FOR INFORMATION
ONLY

SCOPE

To assign responsibilities for tracking of open items and commitments and to provide guidance on how the objective will be accomplished.

ENCLOSURES

AP-0055 - Pgs. 1-2 - Rev. 2

REFERENCE

1. Current Users Manual for Computer Program (Issued by NSD)
"Project Commitment Tracking and Responsibility System" (PROCTR) 11
2. AP-0020, "Operating Information Review" 11
3. INPO Finding TS.3-2 (1984) 11

DEFINITIONS

Closeout/Closed - The designation given when all required actions have been completed for an Open Item. [3] 11

PROCTR - The "Project Commitment Tracking and Responsibility System," a computer program on the Yankee NSD VAX computer. [1, 3] 11

DISCUSSION

Yankee has established a computerized open items tracking system (PROCTR) to provide a method to follow open items and commitments. Operation of the system is detailed in Reference 1. The system is operated jointly by the plant and NSD. 11

The Technical Services Department Licensing Engineer is responsible for entering and updating information on the system for which the plant is responsible. Department Managers/Supervisors are responsible for insuring that information supplied to the Licensing Engineer is accurate and that due dates are met.

The following areas should be followed by the plant:

I & E Inspection Items

Plant Operation Review Committee Open Items

Items requiring evaluation per Reference 2

Commitments to the NRC requiring action by the plant

INPO Evaluation Items

Yankee NSD Memos requiring action by the Plant

The system is not limited to the above areas. Management determines what items will be followed and will utilize the flexibility of the system to meet current requirements.

Performance of this procedure is dependent on operability of the computer system. Failure of the system may require that manual methods be used until the computer is back in service. The end product of this procedure is to meet regulatory commitments and follow plant requirements. Records of performance of this procedure are not required to be retained.

PROCEDURE

1. The Technical Services Department(TSD) Licensing Engineer will review incoming NRC correspondence and YAEC correspondence to the NRC for commitments and open items pertaining to the plant and insure they are entered on the system.
2. The Plant Superintendent will insure the above documents are forwarded to the TSD Licensing Engineer and will forward any other items to be included on the system.
3. The Evaluation Coordinator will forward Items requiring evaluation and follow by Reference 2 for inclusion on the system. ¶
4. The PORC Secretary will forward items which require PORC follow for inclusion on the system.
5. Due dates will be included as appropriate. Where due dates are appropriate but not indicated, the Licensing Engineer will confer with the cognizant department or individual and assign the due date. ¶
6. On a bi-weekly basis, reports on open items should be produced and distributed to cognizant department managers at the plant. ¶
7. The TSD Licensing engineer will periodically review the status of open items with cognizant department supervisors/managers and appraise the Plant Superintendent of areas of concern. ¶
8. The TSD Licensing Engineer will update the tracking system using information supplied from the departments.
9. The Plant Superintendent will periodically be provided a listing of Open Items. ¶
10. The cognizant individual is responsible for insuring that due dates are met or that extensions are granted.
11. Open Items will be closed out after documentation or notification commensurate with the type of item to be closed, has been submitted to the TSD Licensing Engineering. Examples are verbal, written or action by committee. ¶

VENDOR EQUIPMENT TECHNICAL INFORMATION PROGRAM

FOR INFORMATION
ONLY

SCOPE

To define the handling and responsibilities for vendor technical equipment information for Safety Class Systems, Components and Structures.

ENCLOSURES

AP-0075 - Pgs. 1-2 - Rev. 1
Attachment A - Rev. 1
Attachment B - Pgs. 1 - Rev. 1

DEFINITIONS

Equipment Technical Information (ETI) - Vendor supplied engineering and technical information (drawings, manuals, etc.) and changes thereto, equipment qualification data (provided by the equipment vendor or qualification lab), and industry-developed information, including utility and NRC originated information (SER, SOER, IEB, IEN, etc.)

REFERENCES

1. Generic Letter 83-28, dated July 8, 1983.
2. NUREG 1000, Generic Implication of ATWS Events at the Salem Nuclear Power Plant
3. Letter, YAEC to USNRC, dated June 22, 1984 (FYR 84-70)
4. NUTAC Response on Generic Letter 83-28, Section 2.2.2
Vendor Equipment Technical Information Program, March 1984
5. Memo, L. Richardson to J. D. Haseltine, YRP 426/84 dated May 8, 1984
6. Letter, YAEC to USNRC dated January 13, 1984 (FYR 84-09)
7. AP-0204, "Safety Classification of System, Components, and Structures"
8. AP-0020, "Operating Information Review Program"
9. AP-0222, "Job Orders"
10. AP-0055, "Open Item and Commitment Tracking"
11. Letter Westinghouse to Westinghouse Owner Group dated September 15, 1983 (WDG-83-242)
12. Safety Classification of System Manual

FOR INFORMATION
ONLY

DISCUSSION

This procedure will be used as a guideline for full Implementation of Reference 3, scheduled for current completion Dec 31, 1985. The Vendor Equipment Technical Information Program (VETIP) is composed of two basic systems. One system (Attachment A) is utilized to ensure that appropriate information is available and current for the Reactor Trip System. This system will establish a positive interface with the appropriate vendors or will require sufficient attention to be paid to equipment maintenance, replacement, and repair to compensate for lack of vendor backup. The second system (Attachment B) is utilized for the balance of safety related equipment. This system is composed of the positive interface program established by the NSSS (Westinghouse), Review of See-In program reports (SER& SOER), direct contact with vendors (as applicable), review of I&E Bulletins, I&E Notices, USNRC Letters (as applicable).

The procedure steps are used to indicate different portions of the VETIP and do not reflect an order in which the procedure must be accomplished.

PROCEDURE

1. The Reactor Trip System VETIP is outlined in Attachment A.
2. The balance of safety related equipment VETIP is outlined in Attachment B.

FINAL CONDITION

The ETI has been reviewed and incorporated as necessary into applicable procedures, drawings, etc.

ATTACHMENT A

REACTOR TRIP SYSTEM VETIP

FOR INFORMATION
ONLY

PROCEDURE

1. The cognizant department will review ETI received and incorporate into appropriate procedures, drawings, etc, as applicable.
2. If the ETI is to be used in lieu of a procedure or a portion of a procedure then the ETI shall be placed under the controls of AP-0223, Document Control.
3. Identify applicable technical information on the procurement document where available, and request a Certificate of Conformance (COC) for direct replacement, where possible.
4. ETI received under the operating experience assessment program will be handled per AP-0020. The cognizant department is responsible for incorporating applicable ETI per step 1.
5. Where vendors have gone out of business or will not supply the information, sufficient attention will be paid to maintenance and repairs to assure a high reactor trip system reliability.
6. AP-0055, Open Items and Commitment Tracking shall be utilized, as applicable, to ensure appropriate ETI is evaluated.

ATTACHMENT B

SAFETY CLASS SYSTEM VETIP

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PROCEDURE

1. The cognizant department will review ETI received and incorporate into appropriate procedures, drawings, etc, as applicable.
2. If the ETI is to be used in lieu of a procedure or a portion of a procedure then the ETI shall be placed under the Controls of AP-0223, Document Control.
3. The interface program with Westinghouse (NSSS) is established as follows: [11, required action 2.d vendor interface (technical information)].
 - a. Changes to Westinghouse technical manuals, instructions, etc. received will be forwarded via the Technical Services Department to the cognizant department who will process per step 1.
 - b. Technical bulletins and data letters will be handled per AP-0020, Operating Information Review.
4. Vendors of safety class systems, components, and structures will be utilized for assistance as necessary. ETI received via this method will be handled per step 1.
5. ETI received from sources such as I&E Bulletins, I&E Notices, USNRC letters to YAEC, INPO Significant Operating Experience Reports (SOER), INPO Significant Event Reports (SER), 10CFR21 reports received, etc. will be reviewed under AP-0020, Operating Information Review.
6. ETI received from the procurement process will be reviewed and handled per step 1.
7. ETI obtained via design changes are handled per AP-0222, Job Orders and step 1.
8. Nuclear Plant Reliability Data System Program Reports are issued by INPO on a periodic basis. These reports are normally routed and are available for evaluating and checking of current problems associated with vendor products as needed.
9. When vendors have gone out of business or will not supply appropriate information, sufficient attention will be paid to equipment maintenance, repairs, and plant changes to assure reliability commensurate with its safety function.
10. AP-0055, Open Items and Commitment Tracking shall be utilized, as applicable, to ensure appropriate ETI is evaluated.

MATERIAL & SERVICE PROCUREMENT PROGRAM

FOR INFORMATION
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SCOPE

To identify the programmatic and procedural requirements necessary to assure that applicable regulatory requirements, design bases and other requirements which are necessary to assure adequate quality, are suitably included or referenced in the documents for procurement of material, equipment and services.

ENCLOSURES

AP-0211 - Pgs. 1-12 - Rev. 12
APF-0211.1 - Pg. 1 - Rev. 12
APF-0211.1A - Pg. 1 - Rev. 12
APF-0211.2 - Pg. 1 - Rev. 12
APF-0211.3 - Pg. 1 - Rev. 12
APF-0211.4 - Pg. 1 - Rev. 12
AP-0211 - Attachment A - Pgs. 1-2 - Rev. 12
AP-0211 - Attachment B - Pgs. 1-3 - Rev. 12

DEFINITIONS

1. "Basic Components", when applied to nuclear power reactors means a plant structure, system, component or part thereof necessary to assure (1) the integrity of the reactor coolant pressure boundary, (2) the capability to shut down the reactor and maintain it in a safe shutdown condition, or (3) the capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposures comparable to those referred to in Sections 100.11 of this chapter. "Basic component," when applied to other facilities and when applied to other activities licensed pursuant to Parts 30, 40, 50, 70 or 71 of this chapter, means a component, structure, system or part thereof that is directly procured by the licensee of a facility or activity subject to the regulations in this part and in which a defect* or failure to comply* with any applicable regulation in this chapter, order, or license issued by the Commission could create a substantial safety hazard*. In all cases, "Basic component" includes design, inspection, testing, or consulting services important to safety that are associated with the component hardware, whether these services are performed by the component supplier or others. A commercial grade item is not a part of a basic component until after dedication.
2. "Commercial Grade Items" means an item that is (1) not subject to design or specification requirements that are unique to facilities or activities licensed pursuant to Part 30, 40, 50, 70 or 71 of this chapter and (2) used in applications other than facilities or activities licensed pursuant to Part 30, 40, 50, 70 or 71 of this chapter and (3) to be ordered from the manufacturer/supplier on the basis of specifications set forth in the manufacturer's published product description (for example a catalog).

* See Reference 8 for specific definition of these terms

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REFERENCES

1. 10 CFR Appendix B
2. Yankee Operational Quality Assurance Program - YOQAP-1-A
3. ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants".
4. ANSI N45.2.13-1976, "Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants".
5. 10 CFR Part 21, Reporting of Defects and Noncompliance
6. YAEC, Approved Vendors List for Operating Plants
7. YAEC, Operations Guideline Book; Guideline No. 1, "Policy for Material Purchases, Design Changes, Repairs and Alterations, Bids, Nonconformance Reports, QA Records".
8. YAEC, Technical Administrative Guideline Book; Guideline No. 6, "Policy for 10 CFR 21 Reporting".
9. YAEC, Engineering Guidelines Book II, "General Specifications".
10. Memo, C.J. Campbell to D. Hanson/D. Moody; Subject, "10 CFR Part 21 Language for Purchasing Agreements", dated January 6, 1981.
11. Memo, J.R. Woffman/D.B. Pike to Holders of Engineering Guideline Book; Subject, "Appendix A to YA-Gen-1", MEG 154/82, dated February 26, 1982.
12. AP-0001, "Plant Procedures"
13. AP-0204, "Safety Classification of Systems, Components and Structures"
14. AP-0206; "Nonconforming Material, Parts and Components"
15. AP-0212, "Control of Purchased Material, Equipment and Services"
16. AP-0221, "Plant Record Management"
17. AP-0226, "Qualification and Training of Personnel"
18. AP-0227, "Corrective Actions"

DISCUSSION

This procedure establishes the plant requirements for the preparation review, issue, and control of purchase documents. These requirements shall be utilized and/or incorporated into applicable purchasing guidelines and procedures to assure adequate quality of procured material and/or services.

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The procedure is divided into several areas as follows:

- I. General
- II. Responsibilities
- III. Procurement Document Preparation, Review and Change Control
- IV. Selection of Procurement Sources
- V. Bid Evaluation and Awards
- VI. Purchase Evaluation of Supplier Performance
- VII. Verification Activities
- VIII. Control of Nonconformances
- IX. Corrective Action
- X. Acceptance of Item or Service
- XI. Quality Assurance Records
- XII. Audits of Procurement Program

PROCEDURE

I. GENERAL

- A. This procedure applies to the procurement of material and/or services for those systems, components, and structures or items delineated in Reference 13, "Safety Classification of Systems, Components and Structures". [4,1.1]
- B. A procurement document shall be initiated and approved prior to contracting for systems, components, structures, or services.

1. Services:

a. Plant Originated Requests for Services:

Services in this context mean actual hands-on work on safety classified components, systems or structures or items delineated in Reference 13, performed by personnel outside those considered as plant employees. For instance, hiring contractors to; stellite valve seats, on site or away; flush plant systems; or repair safety class equipment, on site or away; to perform welding, heat treating, in-service inspections, non-destructive testing activities or calibration of measuring and test equipment. Analytical work, advice, consultation and other such "software" is not considered a "service" for purposes of MPR generation unless 10 CFR Part 21 applies.

b. NSD Originated Requests for Services are performed in accordance with Reference 7.

- C. Material and/or service procurements, except for NSD initiated services, are initiated by the cognizant individual utilizing the Material and Service Purchase Request (MPR) Forms: APF-0211.1, 0211.1A, and 0211.4.

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Attachment A identifies the items that shall be addressed in APF-0211.1, 0211.1A, and 0211.4

Attachment B details the requirements for defining the level of proposed or procured items.

- D. In all cases, the procurement vehicle must contain the same information as detailed on the approved MPR, supplements and/or revision and the Review Form (YPP-8), except for editorial, quantity, and associated changes created by these exceptions.
- E. Changes to the MPR, except editorial, shall be implemented as follows:
 - 1. Supplement(s) to the MPR shall be utilized to add or change requirements.
 - 2. Revisions to the MPR shall be utilized to delete all previous requirements.
 - 3. Changes to quantities may be made by the cognizant individual or a supervisor in the same department.
- F. Material requiring QA shall be purchased from vendors on the Approved Vendors List (AVL) or vendors that are specifically reviewed and approved by QA Department prior to use.
- G. Yankee Atomic Electric Company may act as either the supplier or purchaser. [4,1.2.1]
- H. The MPR shall be approved by the Department Head or his alternate.
- I. The MPR shall be forwarded to Stores.
- J. Stores shall provide for the following, as applicable:
 - 1. Identification of Q/A number.
 - 2. MPR Status (APF-0211.2) and Control (APF-0211.3).
 - 3. Complete requisition.
 - 4. Issue a copy of QA and non-QA related MPR's to the Plant Fire Protection Coordinator (at TSD) for items purchased for the Fire Protection System.
 - 5. Level of item(s).
- K. Stores maintains Q/A folders retaining all pertinent documentation or referencing their location pursuant to Reference 16, "Plant Record Management".

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- L. The Plant Superintendent or his alternate shall approve the requisition and return it to Stores.
- M. The MPR, requisition, and pertinent documents shall be forwarded to NSD (telecopy if priority and need dictate).
- N. The reviewed procurement document and Purchase Order copy, if approved, shall be returned to Stores.
- O. Blanket Purchase Orders shall be written for a term not to exceed one year (normally based on a calendar year).
- P. QA shall review the procurement vehicle for verification that it conforms to the approved MPR.
- Q. Stores shall distribute copies, as applicable.

II. RESPONSIBILITIES [2, IV.B]

- A. The Nuclear Services Division Quality Assurance (QA) Department shall be responsible for:
 - 1. Audit of procurement document control, including the preparation, review, and approval of purchase requisitions for material, equipment, and services covered by the Operational Quality Assurance Program.
 - 2. Review of procurement documents initiated by the Plant or the Yankee Nuclear Services Division.

- B. The Plant shall be responsible for:

- 1. The preparation, review, issue, and control of purchase documents.
 - 2. Preparation of detail as to how purchase documents are prepared, reviewed, approved, issued, and controlled.
 - a. The cognizant department is responsible for the identification of applicability of 10 CFR 21 requirements.

NOTE: 10CFR21 reporting requirements apply to suppliers of "Basic Components" which are not "Commercial Grade". [8]

- b. The Department Head or his alternate is responsible for review and approval of the procurement document prior to the issuance of a requisition.
 - c. The Plant Superintendent or his alternate is responsible for review and approval of requisitions prior to the issuance of a purchase order.

- C. The Nuclear Services Division Engineering and/or Project Departments shall be responsible for:
 - 1. Preparation of engineering specifications which detail the technical and quality requirements for material, equipment and services.
 - 2. Initiation and/or review of purchase documentation for material, equipment, and services required for Plant changes.
- D. The NSD Construction Department shall be responsible for initiation and/or review of purchase document for construction services including contractor supplied material and equipment required for Plant changes.
- E. The Vice President(s) and Manager of Operations and their staff shall be responsible for the review and approval of procurement documents.

III. PROCUREMENT DOCUMENT PREPARATION, REVIEW, AND CHANGE CONTROL

A. Preparation

- 1. The procurement document shall address the following areas, as appropriate.
 - a. Engineering specification
 - b. Technical requirements
 - c. Quality Assurance requirements
 - d. Drawings
 - e. Codes and/or Standards
 - f. Regulations
 - g. Procedures and Instructions
 - h. Testing requirements
 - i. Inspection requirements
 - j. Packaging, Shipping, Handling and Storage requirements
 - k. Requirements for non-approved vendors to incorporate appropriate quality assurance program requirements in subtier procurement documents [4, 3.2.3]
 - l. Right of access to the supplier facility and records for surveillance to procurement specifications.
[2, IV.C.1.c.6][4,3.2.4]

m. Documentation submittal, review, timing thereof, record retention and disposition as applicable [4,3.2.5] [2,VII.C.1.d.1][13,VII.C.1.g]

n. Handling and disposition of nonconformances [4,3.2.6]

NOTE: See Section VII, Control of Nonconformances

o. Notification, hold or witness, points [4,6.2][2,VII.C.1.c]

p. Method of acceptance as follows:

NOTE: See Section X

1. Material

a. Source Verification and/or

b. Receipt Inspection and/or

c. Certificate of Conformance (C of C)

d. Post Installation Test

2. Services

a. Technical verification of data produced and/or

b. Surveillance and/or audit of the activity and/or

c. Review of object evidence for compliance to procurement requirements.

q. Requirements to allow traceability of material and parts to the appropriate documentation. [2,VIII.C.1.a]

2. The procurement document, associated correspondence, meetings, etc. shall provide for a description of the material and/or service and shall be utilized to establish an understanding between YANKEE and suppliers or purchases. [4,3.2.1][4,6.2]

B. Review and Change Control

1. Review and approval of the procurement document shall be in accordance with the requirements of Section II.

2. These reviews shall be documented prior to the release and availability of this documentation for verification. [2,IV.C.1.a] The review shall include the following:

a. Appropriate preparation requirements

b. Determination of any additional or modified design criteria

- c. Analysis of exceptions or changes requested or specified by the Supplier and determination of the effects such changes may have on the procurement document, material and/or service.
- 3. Review and approval of changes and revisions to procurement documents shall be at least equivalent to those for the original document. [2,IV.C.1.d]
- 4. Spares and replacement parts procurement documents shall receive the equivalent review of the original equipment except as follows: [2,IV.C.1.e][4,3.1][7][9][11]
 - a. Items that meet the requirements of the Component Exclusion Criteria of Reference 13.
 - b. Proprietary fittings, such as Swagelok, Gyrolok, NUPRO, Cajon, Sno-Trik, Parker-Hannifin, etc. [9]
 - c. Instrument valves, such as Whitey, Hoke, etc. [9]
 - d. ASCO solenoid valves and repair kits. [9]
 - e. Steam traps. [9]
 - f. Gaskets, Seals, Seal Cartridges, Packing and O-Rings. [9]
 - g. Filter cartridges for liquid system filters. [9]
 - h. Atkomatic Solenoid valves and repair kits. [9]
 - i. Diaphragms used in certain valves to isolate the plug from the controlled fluids are not considered part of the pressure boundary and do not require MPR review. [7]
 - j. A meter, gauge or recorder if it is not required to be operable during the "follow phase" of an off-normal condition. [7]
 - k. Instrumentation tubing if it is normally effectively isolated from primary pressure by a closed valve, excess flow check valve, flow limiting device, orifice or diaphragm. [7]
 - l. Tric-Nuts (Power Installation Tooling, Catalog 210) [11]
 - m. Behringer Tube Clamps - 1/2 inch, 3/8 inch, and 3/4 inch, size [11]
 - n. Eaton Corporation Fasteners [11]
 - 1. Part No. 17280-1224 (#12 Bolt)

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2. Part No. C31244 (1/4 - 20 Bolt)
3. Part No. C31507 (1/4 - 20 Bolt)

NOTE:

The above will normally use a Plant identified Q/A document series. This list may be added to on a periodic basis without revising this procedure. However, additions shall be approved by NSD Engineering, Operations and Operational Quality Assurance via a memo. This list will be revised when the procedure is revised.

Documentation for the above listed components shall include a C of C for the material that the material(s), part number(s), drawing number(s) and revision number(s) of the material provided are identical to the material(s), part number(s), drawing number(s) and revision number(s) of the material(s) requested on the purchase order, as applicable.

5. Procurement documents and associated correspondence shall be implemented as soon as possible to ensure adequate understanding of procurement requirements. [4,6.2]

IV. SELECTION OF PROCUREMENT SERVICES

A. General

1. Material and/or services shall be purchased from manufacturers or suppliers that are on the "Approved Vendors List for Operating Plants" or that have been specifically approved by QAD. [4,3.2.3]
2. Purchases from non-approved vendors shall require vendor evaluation, surveillance, or receipt inspection witnessing as determined by QA. Non-approved vendors shall be utilized only when material and/or services are not available from an approved vendor.

V. BID EVALUATION AND AWARDS

- A. Bids and evaluations thereof for the awarding of contracts are handled by NSD.
- B. Bids for material, items or services costing greater than \$300 but which do not require a contract should be obtained and award will be based on cost, availability and performance.

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VI. PURCHASER EVALUATION OF SUPPLIER PERFORMANCE

A. General

1. Evaluation of suppliers is performed through the use of the following, as applicable. [4,6.1]
 - a. Vendor Evaluation
 - b. Audits
 - c. Nonconformance Reports
 - d. Plant Information Reports
 - e. License Event Reports
 - f. Surveillance
 - g. Receipt Inspections
 - h. Source Inspections

VII. VERIFICATION ACTIVITIES [4,7]

A. General

1. Verification activities shall be planned and implemented, as appropriate to assure conformance of procured items and services to identified requirements.
2. Verification activities shall meet the requirement of the approved procurement document and Reference 15, AP-0212, "Control of Purchased Material, Equipment and Services"

VIII. CONTROL OF NONCONFORMANCE [4, 8]

- A. Nonconformances are handled pursuant to Reference 14, AP-0206, "Nonconforming Material, Parts and Components" [4,8.1]
- B. Nonconformances at the suppliers level are handled pursuant to their QA program and the procurement document and shall address the following as applicable: [4,8.2]
 1. Review of the Nonconforming item
 2. Submittal of a nonconforming report as directed by YANKEE
 3. Recommended disposition and technical justification.

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IX. CORRECTIVE ACTION [4, 9]

- A. Corrective actions are handled per Reference 18, AP-0227, "Corrective Action".

X. ACCEPTANCE OF ITEM OR SERVICE [4, 10]

- A. Acceptance by Source Verification. Acceptance by source verification should be considered when the item or service is:
1. Vital to plant safety; or
 2. Difficult to verify quality characteristics after delivery; or
 3. Complex in design, manufacture, and test.
- B. Acceptance by Receiving Inspection. Acceptance solely by receiving inspection is satisfactory when the items or services are:
1. Relatively simple and standard in design, manufacture, and test; and
 2. Adaptable to standard or automated inspections and/or tests of the end product to verify quality characteristics after delivery; and
 3. Such that receiving inspection does not require operations which could adversely affect the integrity, function, or cleanness of the item.
- C. Acceptance by Supplier Certificate of Conformance. In certain procurement actions which do not involve direct inspection by the Purchaser, the Purchaser may accept an item or service from a Supplier based only on a Supplier's certificate of conformance that the specified requirements have been met. However, specific supplemental documentation, such as material certificates or reports of tests performed, may be required by procurement documents. Acceptance by this method is satisfactory when the item or service is of simple design and involves standard materials, processes and tests. Such items may be fabricated subject to selected qualification, sample, or batch testing to establish or maintain a minimum quality confidence level.
- D. Acceptance by Post Installation Test at the Nuclear Power Plant Site. Acceptance by this method is satisfactory when performed following the accomplishment of at least one of the preceding methods and when:

NOTE: Post installation test requirements and acceptance documentation should be mutually established by the Purchaser and Supplier.

1. It is difficult to verify the quality characteristics of the item without it being installed and in use; or
 2. The item requires an integrated system checkout or test with other items to verify its quality characteristics; or
 3. The item cannot demonstrate its ability to perform its intended function except when in use.
- E. Acceptance of Services Only. The guidelines outlined in the above primarily deal with hardware items and related services. In certain cases involving: procurement of services only, such as third party inspection; engineering and consulting services; and installation, repair, overhaul or maintenance work; the Purchaser may accept the service by any or all of the following methods:
1. Technical verification of data produced.
 2. Surveillance and/or audit of the activity.
 3. Review of objective evidence for conformance to the procurement document requirements such as certifications, stress reports, etc.

XI. QUALITY ASSURANCE RECORDS [4, 11]

- A. Records shall be collected, stored and maintained pursuant to Reference 16, AP-0221, "Plant Record Management"

XII. AUDITS OF PROCUREMENT PROGRAM [4, 12]

Per Section II.A of this procedure.

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The following items shall be addressed, as applicable:

- a. Date MPR initiated
- b. Identification of cognizant person
- c. Identification of Job Order Number
- d. Identification of PA, PDCR, or EDCR number
- e. Identification of specifications(s):
 - (1) An approved NSD specification, eg, YA-GEN-2, or if not available,
 - (2) the original specification(s), or
 - (3) the manufacturer's specification
- f. Identification of Safety Class (1, 2, 3, SC, Requires QA, etc)
NOTE: Complete and attach AP-0211.4 if QA required
- g. Identification of Level of Item (determined by Stores)
- h. Date wanted
- i. Cost estimate: (Total Cost)

NOTE: Any request greater than \$300 should have a memo attached and provide for the following:

- 1. Need and purchase of material
 - 2. Vendor Choice
 - a. Sole Source
(Reason: Unique/Matching/Accessory)
 - b. Low Bidder (three bids if possible)
 - c. Emergency
 - 3. Not to exceed cost without written approval
- j. Original Work Unit
 - k. Work Order Number
 - l. Previous P.O. Number

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- m. Previous Q/A Number
- n. Estimated Delivery Time (in stock; 1, 2, etc. week delivery)
- o. Material For (eg, P-15, Yankee Plant)
- p. Item - Identify each separate item or service by a sequential number (eg. 01, 02, 03, 04, etc)
- q. Quantity
- r. Units (eg. ea, pr, box, gross, etc)
- s. Description of Goods and/or Services and:
 - (1) Scope of Work
 - (2) Technical Requirements
 - (3) Right of Access
 - (4) Documentation Requirements
- t. Unit Cost
- u. Identify Method of Acceptance(s)
- v. Order From -

NOTE: Also indicate shipping address if different from the Order-From-Address
- w. Attention - Name person quoting item at vendor site

CLASSIFICATION OF ITEMS

The requirements for packaging, shipping, receiving, storage and handling are divided into four levels with respect to protective measures to prevent damage, deterioration or contamination of the items, based upon the important physical characteristics and not upon the important functional characteristic of the item with respect to safety, reliability and operation. It should be recognized, however, that within the scope of each level there may be a range of controls and that the DETAILED requirements for an item are dependent on the importance of the item to safety or reliability. For example, even though a reactor vessel and structural steel are classified as level D, the degree of protection and control over the reactor vessel should exceed that of the structural steel. Each of the specific items governed by this procedure shall be classified into one of these four levels. The manufacturer's documented standard or minimum requirements shall be considered when classifying the items. Items, once classified, shall be restricted to the level or higher for each of the packaging, shipping, receiving, storage and handling operations. Items shall not be classified according to the requirements of one level, then packaged, shipped, received, stored or handled according to a level of lower grade. Any package unit or assembly made up of items of different levels shall be classified to the highest level designated for any of the respective parts. If the unit is disassembled, a level shall be indicated for each part.

Materials requiring quality assurance, and subjected to the requirements of Reference 3, shall be categorized under one of the following levels:

1. LEVEL A

Items classified to Level A are those that are exceptionally sensitive to environmental conditions and require special measures for protection from one or more of the following effects: temperatures outside required limits, sudden temperature changes, humidity and vapors, gravitational (g) forces, physical damage and airborne contamination (eg, rain, snow, dust, dirt, salt spray, fumes).

The following shall be used as a guide for classifying items intended for this level classification:

- (1) Special electronic equipment and instrumentation.
- (2) Special materials, such as chemicals that are sensitive to environment.

2. LEVEL B

Items classified to Level B are those that are sensitive to environmental conditions and require measures for protection from the effects of temperature extremes, humidity and vapors, g forces, physical damage and airborne contamination and should not require special protection required for Level A items.

The following shall be used as a guide for classifying items intended for this level classification:

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- (1) Instrumentation
- (2) Electrical penetrations
- (3) Batteries
- (4) Welding electrode and wire
- (5) Control rod devices
- (6) Motor control centers, switchgear and control panels
- (7) Motors and generators
- (8) Precision machined parts
- (9) Erection spares, such as gaskets, "O" rings
- (10) Air handling filters
- (11) Computers
- (12) Special nuclear material (fuel) and sources. The requirements of the AEC fuel license and conditions and other governmental agencies shall be met.

3. LEVEL C

Items classified to Level C are those that require protection from exposure to the environment, airborne contamination, g forces and physical damage. Protection from water vapor and condensation is not so important as that for Level B items.

The following shall be used as a guide for classifying items intended for this level classification:

- (1) Pumps
- (2) Valves
- (3) Fluid filters
- (4) Reactor internals
- (5) Compressors
- (6) Auxiliary turbines
- (7) Instrument cable

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- (8) Refueling equipment
- (9) Thermal insulation
- (10) Fans and blowers
- (11) Cement
- (12) Electrical cable

4. LEVEL D

Items classified to Level D are those that are less sensitive to the environment than Level C. These items require protection against the elements, airborne contamination, and physical damage.

The following shall be used as a guide for classifying items for this level classification.

- (1) Tanks
- (2) Heat exchangers and parts
- (3) Accumulators
- (4) Demineralizers
- (5) Reactor vessel
- (6) Evaporators
- (7) Steam generators
- (8) Pressurizer
- (9) Piping
- (10) Structural items
- (11) Reinforcing steel
- (12) Aggregates

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Date _____ ONLY

Cogn. Per. _____

Job Order No. _____

PA, PDCR, or EDCR No. _____

Specification_____

*Safety Classification_____

Level of Item _____

Date Wanted _____

Cost Estimate _____

Material For _____

Rev. 12 ACN #1

YANKEE PLANT - MATERIAL AND SERVICE PURCHASE REQUEST

Q/A No. _____

(Continuation Sheet)

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[illegible]

MPR STATUS FORM

[illegible]

Form is Not a Required Record; Subject to Change Without Formal Approval

YANKEE ATOMIC ELECTRIC COMPANY

ROWE, MASSACHUSETTS

DOCUMENT CONTROL (PURCHASED MATERIAL & SERVICES

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Q/A Number: _____

System: _____

Cognizant Person: _____

Safety Class: _____

	<u>INITIALS</u>	<u>NUMBERS</u>	<u>FILE DATE</u>
Material Purchase Request Form:	_____	_____	_____
Supply Requisition	_____	_____	_____
Review Form Filed in Stores:	_____	_____	_____
Purchase Order (YPP-8)	_____	_____	_____

MPR _____

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The following requirements shall apply to this purchase order.

ITEM:

1. YES ☐ NO ☐ Packaging and Shipping shall be in accordance with ANSI N45.2.2-1972, Level _____ with the following exceptions:
- 1) Section 3.7.1 & A 3.7.1 Containers. **Alternative:** Containers shall be of suitable construction to assure material is received undamaged.
- 2) Section 3.7.2 Crates and Skids, Sentence No. 2. **Alternative:** Skids or runners shall be used on boxes with a gross weight of 100 pounds or more if practical, allowing a minimum floor clearance for forklift tines as provided by 4 inch lumber.
- 3) Section A.3.5.1 (1) Caps and Plugs - Item (1), Sentence 1. **Alternative:** Non-metallic plugs and caps shall be of a contrasting color.
- 4) Section A.3.9 (1) Second Group Marking. **Alternative:** Containers shall be adequately marked to provide identification and retrieveability.
- 5) Section A.3.9. (4) Second Group Marking. **Alternative:** Container markings shall be applied with waterproof MK or paint in characters whose size permit easy recognition.
- 6) Section A.3.9 (6) Second Group Marking. **Alternative:** Marking shall be adequate to provide identification, traceability and instructions for special handling, as applicable.
2. YES ☐ NO ☐ Packaging and shipping shall be in accordance with manufacturer's/vendor's instruction: _____
(Instruction Identification)
3. YES ☐ NO ☐ Packaging and shipping shall be in accordance with manufacturer's/vendor's recommendations.
4. YES ☐ NO ☐ Material to be hand carried; packaging shall be utilized to protect the material as necessary.
5. YES ☐ NO ☐ A Certification of Compliance stating that items supplied are equal to or better than requested by this Purchase Order.
6. YES ☐ NO ☐ A Certification of Compliance relating the material supplied to this Purchase Order.
7. YES ☐ NO ☐ The manufacturer is supplying commercial grade _____ (eg. cable) and the vendor is allowed to take exception to the testing requirements specified in Yankee Specification _____, Rev. _____, paragraphs _____. The Vendor may substitute his specification for these paragraphs.
8. YES ☐ NO ☐ Please calibrate the equipment listed on this purchase order traceable to the National Bureau of Standards showing both **AS FOUND (Before Adjustments)** and **AS LEFT (After Adjustments)** calibration values and data. Documentation of traceability and AS FOUND and AS LEFT values shall be returned with the equipment.
9. YES ☐ NO ☐ The provisions of 10 CFR 21, regulations promulgated by the Nuclear Regulatory Commission, apply to this transaction. You are to notify Yankee Atomic Electric Company immediately if you believe you have a reportable condition. (10).
10. YES ☐ NO ☐ The vendor shall notify the Operational Quality Assurance Department, _____ (Name) of Yankee Atomic Electric Company at _____ (Tel. No.), Ext. _____ (Quantity) hours prior to shipment.
11. YES ☐ NO ☐ The material covered by this purchase order shall be certified to be qualified to meet the requirements of _____ (code, standard, etc.) for the service conditions specified. Documentation providing proof of this qualification, such as test reports, including Report No. _____ (if available) shall be provided. If qualification documentation is available for equipment which is similar, but not identical to the equipment under this purchase order, the seller shall justify the applicability of the qualification documentation to the purchased equipment. If no qualifications exist for the specified equipment the seller shall so state in writing.
- *** 12. Documentation requested shall be submitted to the Purchaser with delivery of the product (s) or under separate cover immediately thereafter.
- *** 13. If unable to comply with the listed requirements you shall notify Yankee Atomic Electric Company Operational Quality Assurance Department at (617) 872-8100, Extension 2450 or 2458 for resolution.
- ***
- NOTES
1. Check Items 1-11 as applicable.
 2. Items 12 & 13 shall be applied to all procurement request.
 3. List any other requirements on the MPR Form, APF-0211.1 or APF-0211.1A.

Westinghouse
Electric Corporation

Water Reactor
Divisions

Nuclear Services
Interchange Division
Box 228
Pittsburgh Pennsylvania 15230

FOR INFORMATION
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September 15, 1983

WOG-83-242

TO: Westinghouse Owners Group Representatives
and
Technical Specification Subcommittee Members

Westinghouse Owners Group
Technical Specification Subcommittee
Guideline for Utility Responses to
Generic Letter 83-28, 7/8/83
"Required Action Based on Generic Implications
of Salem ATWS Events"

On July 8, 1983, the NRC issued Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events", to all licensees, applicants, and holders of construction permits. This letter requires utility responses covering a host of topics within 120 days of the date of issuance.

At their meeting of July 26, 1983, the Tech Spec Subcommittee requested Westinghouse to develop a guideline for response to the topics raised in the generic letter. The Westinghouse input was prepared and was presented to the Tech Spec Subcommittee for review at their meeting of September 8, 1983, in Pittsburgh. Their comments were subsequently incorporated into the guideline and it is now being transmitted for your use in preparing your response to 83-28.

It should be understood that this input is generic and must be reviewed closely for applicability to your plant. In some cases, this information may not apply to all utilities. It should also be understood that this input was not developed so that the words could be used verbatim in your response; rather, they are to serve merely as an aid.

This guideline was prepared using the format of Generic Letter 83-28 for easy reference. The following is a brief summary of its content:

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G.L. 83-28,

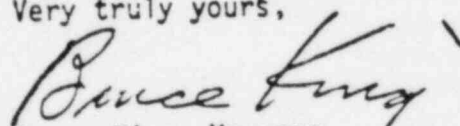
Section

Westinghouse Guideline Summary

- | | |
|---|--|
| 1.1 Post Trip Review | Utility Specific Response |
| 1.2 Data and Info Capability | Discussion of generic capabilities of W computer systems, PAMS equipment, and SPDS. |
| 2.1 Equipment Class and Vendor Interface (R.T. System) | General discussion of W classification practices. Verification of documents, procedures, and info handling systems are utility specific. In addition, a summary of the latest W/Owner vendor interface program is outlined. For more info on the AIF classification activities, please contact the AIF coordinator, Pat Higgins (301-654-9260, Ext. 273 or 209). |
| 2.2 Same as 2.1 - All Safety Related Components | |
| 3.1 Post Maintenance Testing (RTS) | Current WOG efforts are restricted to R.T. Switchgear components only. |
| 3.2 Post Maintenance Testing (All other S.R. Equipment) | Utility Specific Response - No WOG Programs in effect. |
| 4.1 R.T.S. Reliability (Vendor Mods) | W input provided explaining all modifications made to R.T. Switchgear and how to verify their implementation. |
| 4.2 R.T.S. Reliability (PM and Surv. Program R.T. Breakers) | Scope of current WOG activities outlined. Some areas of responses are utility specific since no WOG programs are defined. |
| 4.3 R.T.S. Reliability (Auto Shunt Trip) | WOG effort underway to develop generic design and response to SER questions. See Shunt Trip package. |
| 4.4 R.T.S. Reliability (B&W plants) | N/A |
| 4.5 R.T.S. (System Funct. Testing) | W input provided where applicable. Some parts utility specific. |

If you have need for additional information or clarification, please advise.
Thank you.

Very truly yours,


Bruce King, Manager
Westinghouse Owners Group

/pab
Attachment
cc: WOG Alternates

Required Action 2.1 Equipment Classification and Vendor Interface (Reactor Trip System Components) and

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2.2 Equipment Classification and Vendor Interface (All Safety-related Components)

1. Verification of documents, procedures, and information handling systems - utility specific review.

2. Equipment classification design verification, and qualification.

a. Equipment Classification

Equipment classification for Westinghouse supplied equipment is accomplished by following the guidelines established in ANS 18.2 for fluid system components and the Class 1E definition provided in IEEE standards for electrical components. Lists of systems and major components resulting from this evaluation are typically contained in Sections 3.2, 3.10, and 3.11 of the utility's FSAR. The industry has not yet developed criteria for component classification to the level indicated by the NRC in paragraph 2.2 (1)(1) of G.L. 83-28. One approach to address this issue could be a detailed inventory of parts within each system or major component with engineering judgements applied to each part's classification and necessary controls. An alternate method would be a hierarchical approach to define the components safety classification based on component reliability data, etc. There are currently no WOG programs approved that address classification in the detail implied in G.L. 83-28.

The Westinghouse QA program is described in WCAP-8370 or Chapter 17 of the FSAR. This program applies to the design, procurement and fabrication activities involving safety-related structures, systems and components and has been approved by the NRC. Westinghouse has also established a policy which ensures that all orders, including spare parts, that identify equipment for safety-related applications in nuclear plants will be processed through the Water Reactor Divisions for which this QA program was prepared (see Vendor Interface section).

Westinghouse provides guidance on parts procurement, mandatory and recommended maintenance and ensures communication to utilities on relevant issues via a Technical Bulletin system.

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b. Design Verification and Qualification

Design verification is accomplished by a review of the design by a qualified individual or task group and by testing or analysis. This testing or analysis provides assurance that the system/component will perform properly during all anticipated service conditions. Guidance provided by IEEE standards 323, 344 and associated "daughter" documents, Regulatory Guide 1.89, and 1.100, NUREG-0588, IE Bulletin 79-01B are considered as they apply to the utility receiving equipment. Where required, a qualified life is established as part of the qualification program. Any maintenance, including replacement of parts, that is required to maintain this qualified life is communicated to the utility at the time when the equipment is received.

c. Importance to Safety Classification

The AIF has recently formed a working group to address the most recent questions raised by the Staff on the issue of the "important to safety" classification. It is recommended that the WOG closely follow this activity and support the AIF efforts on this subject.

d. Vendor Interface (Technical Information)

It is the policy of the Westinghouse Electric Corporation to be a reliable supplier of equipment, parts, and services needed by our customers for use in nuclear power plants. Orders for such equipment, parts and services for safety-related applications are to be given the special attention which is required by applicable regulatory requirements as well as commercial practices. The following information summarizes pertinent parts of this Westinghouse policy on the W/customer interface:

Definition of Safety-Related Equipment, Parts and Services

Equipment, parts and services are safety-related if the utility customer for whom the equipment, parts or services are intended indicates that he has responsibility under Nuclear Regulatory Commission Regulation 10 CFR Part 21 for reporting any defects, as defined in that regulation, in the equipment, parts or services as delivered to him or which may subsequently occur.

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Screening of Orders Entered

All orders entered are screened by the Westinghouse District Sales Offices, Distributors, Engineering Service Offices, or Repair Plants to determine whether or not safety-related nuclear equipment, parts or services are involved. Our nuclear utilities have been informed that they must ensure that procurement documents issued by them or by their sub-contractors or agents to Westinghouse clearly indicate if the equipment, parts or services are for a nuclear plant and if so whether or not they are safety-related if they expect Westinghouse to ensure that applicable NRC regulatory requirements are met.

If an order is received for equipment, parts or services for a nuclear plant without any indication of whether or not it is safety-related, then the customer will be asked the following question:

Does the customer have any responsibility under 10 CFR Part 21 for reporting defects, as defined in that regulation, which exist in the equipment, parts or services at the time of delivery or which may subsequently occur?

If the answer to this question is yes, the order is entered through an approved order entry channel.

If the answer to this question is no, normal commercial practices apply.

Approved Order Entry Channels

All orders for equipment parts identified by the purchaser or through screening for safety-related applications are processed through the Water Reactor Divisions (WRD). All safety-related service orders will be placed with divisions who are on an approved supplier list for the particular services requested. If no approved supplier is listed for requested services, the order will be processed through WRD.

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Qualification and Training

NRC regulations place the responsibility for ensuring that regulatory requirements are met in the procurement of safety-related equipment, parts or services on the utility. The utility is required to provide any special requirements to those providing safety-related equipment, parts or services. Westinghouse will ask for any special requirements or instructions from the customer when safety-related equipment, parts or services are involved and to ensure that the work done conforms to those special requirements or instructions.

Informing Customers - Instruction Books

Instruction books are provided by divisions supplying equipment or parts. Such instruction books include information necessary for proper and safe installation, operation, maintenance and repair in ordinary commercial applications of such equipment and parts.

Westinghouse divisions providing services are to obtain copies of appropriate instruction books for the equipment and parts which they service from the divisions which originally supplied the equipment or parts. WRD is to include in its equipment specifications and purchase orders for equipment and parts appropriate requirements for copies of instruction books for its customers and for its own use in developing recommendations to its customers for installation, operation, maintenance and repair of the equipment and parts in nuclear applications.

Instruction books for safety-related equipment are subject to the quality assurance requirements of 10 CFR Part 50 Appendix B and are to be included on the quality assurance release which must accompany any delivery of safety-related equipment or parts.

Substantive errors discovered in instruction books for safety-related equipment after delivery to the customer are subject to the reporting requirements of 10 CFR Part 21. Correction of errors may be accomplished by WRD Technical Bulletins in lieu of revising the instruction books or, in cases in which WRD is not involved, by supplementary information provided directly to its customers by the involved division.

Informing Customers - Technical Bulletins

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Information supplementing or revising the instruction books or other similar materials necessary for proper and safe installation, operation, maintenance or repair of WRD-supplied equipment or parts in nuclear applications is provided by WRD in the form of Technical Bulletins. Preparation of such Technical Bulletins has been centralized within WRD and is subject to the same design control process which applies to the equipment, parts and services to which they relate. Technical Bulletins which are safety-related are so identified.

All Technical Bulletins will be transmitted by WRD to every Westinghouse NSSS customer, domestic and international, and such other WRD customers as are affected. Responsibility for this distribution has been centralized for customers with operating plants and for customers for plants not yet in operation in order to ensure that all Technical Bulletins are promptly distributed. Customers have been requested to provide the necessary distribution lists for their organizations.

All distributions of safety-related Technical Bulletins are now accompanied by a return receipt. The return receipts are pre-addressed to a central point in WRD for recording all Technical Bulletins transmitted and their status. Technical Bulletins for which receipt is not acknowledged within a reasonable time are retransmitted.

A list of current Technical Bulletins and Data Letters will be prepared and transmitted to all customers periodically but not less frequently than once per year. This transmittal is to be in the form of a Technical Bulletin and is to be transmitted in the same manner as any other Technical Bulletin. Appendix A is Bulletin NSD-TB-83-05 which gives the index of currently valid Technical Bulletins.

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