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WILLIAM D. HARRINGTON
SENIOR VICE PRESIDENT
NUCLEAR

July 7, 1985

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

BECO Letter No. 85-121

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

Annual Report of Changes to the Boston Edison
Quality Assurance Program Description

- References: (a) Letter from W.D. Harrington, Senior Vice President (BECO) to the NRC Regional Administrator (Region I), dated July 7, 1984; Subject: Annual Report of Changes to the Boston Edison QA Program Description (BECO Ref. 2.84.098)
- (b) Letter from S.D. Ebner, Director of the Division of Reactor Safety (NRC Region I) to W.D. Harrington, Sr. VP (BECO), dated March 11, 1985; Subject: QA Program Description for Boston Edison Company (BECO Ref. 1.84-070)

Enclosure: (A) Summary of QA Program Description Changes (1984-85)

Dear Dr. Murley:

Pursuant to 10CFR50.54(a), Boston Edison hereby submits a summary of Quality Assurance Program Description changes made since the QA Program Description changes were submitted by Reference (a). NRC approval of the latter was given in Reference (b).

Changes were evaluated according to Quality Assurance Department Procedure 2.06, "Evaluation of QA Program Changes and Submittal to the NRC." The evaluation examines each change to determine if any requirements contained in the previously NRC approved QA Program Description were deleted or made less stringent and thereby constitute a reduction of commitments. The evaluation uses 10CFR50, Appendix B, Criterion II requirements as the basis for concluding that the revised program incorporating the change continues to satisfy the criteria of Appendix B.

All changes are summarized in Enclosure (A). None of the 20 changes issued since 7/7/84 resulted in a reduction of commitments.

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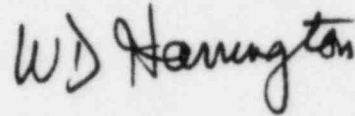
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Applicable changes to the Final Safety Analysis Report (FSAR) are being submitted with Boston Edison's annual FSAR update per 10CFR50.71(e). That submittal will also meet the intent of 10CFR50.54(a)(3)(ii).

I trust that this submittal is acceptable. However, should you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,

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

DAD/nf

cc: QA File 1.6.1

SUMMARY OF QA PROGRAM DESCRIPTION CHANGES (1984-85)

QA Program Change #II-107
Evaluation #84-08

This change modifies Section 5 of BEQAM II as follows:

- Updates a controlled document title (Index of QA Program Related Procedures to 10CFR50, Appendix B Criteria).
- Clarifies maintenance of the QA Program Related Procedures Index and QAD procedure review.
- Defines which PNPS procedures are included in the QA Program Related Procedures Index.
- Reflects that Exhibit II-5-1 is not needed due to the generation of the Index of QA Program Related Procedures.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-117
Evaluation #84-18

This change modifies Section 1 of BEQAM II as follows:

The change reflects the appointing of a VP-Nuclear Operations and corrects the misnaming of the Testing and Standards Section.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-118
Evaluation #84-19

This change modifies Section 2 of BEQAM II as follows:

The change reflects the appointing of a VP-Nuclear Operations.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

* * *

QA Program Change #II-119
Evaluation #84-20

This change modifies Section 4 of BEQAM II as follows:

The referenced section of the Q-List Manual is changed from V to I because Section V has been incorporated into Section I.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-120
Evaluation #84-21

This change modifies Section 7 of BEQAM II as follows:

The referenced section of the Q-List Manual is changed from V to I because Section V has been incorporated into Section I.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-121
Evaluation #84-22

This change modifies Section 18 of BEQAM II as follows:

The change clarifies the scope of audits performed to ensure the Non-Q classification is properly assigned.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-122
Evaluation #84-23

This change modifies Section 1 of BEQAM II as follows:

The change deletes from Figure II-1-2 an unneeded level of organization breakdown.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-123
Evaluation #84-24

This change modifies Section 7 of BEQAM II as follows:

The change provides for purchasing replacement and spare parts from original vendors which supplied Underwriters Laboratories listed or Factory Mutual approved items.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-124
Evaluation #84-25

This change modifies Section 16 of BEQAM II as follows:

The revision provides a more effective means to resolve process and policy issues through the use of the Management Corrective Action Request (MCAR).

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

Enclosure (A)
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QA Program change #II-125
Evaluation #84-26

This change modifies Section 1 of BEQAM II as follows:

The change reflects the current structure of the Executive Office.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-126
Evaluation #85-1

This change modifies Section 15 of BEQAM II as follows:

The change describes and clarifies the use of the Management Corrective Action Request (MCAR) in lieu of the Deficiency Report (DR) for process and policy issues requiring management involvement.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-127
Evaluation #85-2

This change modifies Section 16 of BEQAM II as follows:

The change reflects the revised Management Corrective Action Process which requires preliminary 10CFR Part 21 and 10CFR50.72/.73 reviews for reportability on all corrective action documents, clarifies the use of the MCAR as an escalation document, and transfers descriptions of the MCAR when used in lieu of a DR to Section 15. It also modifies criteria for "significant" to eliminate reference to 10CFR Part 21, 10CFR50.72/.73, and 10CFR50.55e reporting criteria, and criteria associated with policy and process issues addressed separately by the MCAR process.

QA Program Change #II-128
Evaluation #85-3

This change modifies Section 18 of BEQAM II as follows:

The change describes the processing of MCAR's in lieu of DR's for process and policy issues requiring management attention and clarifies the determination of a "significant" DR.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-129
Evaluation #85-4

This change modifies Section 2 of BEQAM II as follows:

The change corrects an obsolete reference by reflecting the reorganization of materials in 10CFR71.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-130
Evaluation #85-5

This change modifies Section 2 of BEQAM II as follows:

The change clarifies the issue and effective date relationship of BEQAM II changes.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-131
Evaluation #85-6

This change modifies Section 15 of BEQAM II as follows:

The change adopts the Deficiency Report (DR) as the method of reporting discrepancies identified during surveillance monitoring and eliminates the Surveillance Finding Sheet (SFS).

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-132
Evaluation #85-7

This change modifies Section 16 of BEQAM II as follows:

The change adopts the Deficiency Report (DR) as the method of reporting discrepancies identified during surveillance monitoring and eliminates the Surveillance Finding Sheet (SFS).

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-133
Evaluation #85-8

This change modifies Section 18 of BEQAM II as follows:

The change adopts the Deficiency Report (DR) as the method of reporting discrepancies identified during surveillance monitoring and eliminates the Surveillance Finding Sheet (SFS).

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

QA Program Change #II-134
Evaluation #85-9

This change modifies Section 2 of BEQAM II as follows:

The change adopts the Deficiency Report (DR) as the method of reporting discrepancies identified during surveillance monitoring and eliminates the Surveillance Finding Sheet (SFS).

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

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QA Program Change #II-135
Evaluation #85-11

This change modifies Section 2 of BEQAM II as follows:

The change reflects current reporting assignments of the Director of Outage Management and the Planning, Scheduling, and Cost Control Manager.

The revised program incorporating this change continues to satisfy the criteria of 10CFR50, Appendix B, and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.