

# Maine Yankee

RELIABLE ELECTRICITY SINCE 1972

329 BATH ROAD • BRUNSWICK, MAINE 04011 • (207) 798-4100

April 3, 1997

MN-97-52 JRH-97-74

## UNITED STATES NUCLEAR REGULATORY COMMISSION

Attention: Document Control Desk

Washington, DC 20555

Reference: (a) License No. DPR-36 (Docket No. 50-309)

Subject: Maine Yankee Operational Quality Assurance Program - Revision 11

Gentlemen:

Enclosed is Revision 11 of the Maine Yankee Operational Quality Assurance Program. This revision satisfies the submittal requirements of 10CFR50.71(e)(4).

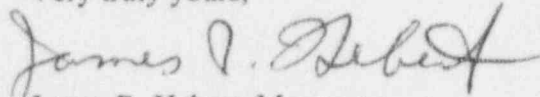
The majority of Revision 11 reflects an organizational realignment of key nuclear safety functions at Maine Yankee. These changes will facilitate safety culture improvements and enhance the effectiveness of the quality assurance program.

While we believe the safety benefits of the organizational changes are clear, we also recognize that recent NRC interpretations of 10CFR50.54(a) would identify the change in reporting relationship of the Quality Programs Manager as a reduction in commitment. Although we view the change as an improvement, we are nonetheless submitting the change for your review and approval.

Section I of the enclosure discusses those changes for which we seek NRC approval. Section II includes those changes which do not constitute reductions in commitment.

If you have any questions regarding the content of the program revision, please contact George Zinke or Steve Downes, (207) 882-6321, ext. 5820.

Very truly yours,



James R. Hebert, Manager

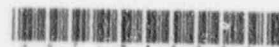
Licensing & Engineering Support Department

JRH/mwf

Enclosure

9704090046 970403  
PDR ADOCK 05000309  
PDR

c: Mr. Hubert Miller  
Mr. J. T. Yerokun  
Mr. Daniel H. Dorman  
Mr. Patrick J. Dosie  
Mr. Uldis Vanags



11 2004

## Maine Yankee Operational Quality Assurance Program Revision 11 Changes

### SECTION I

The following change is submitted in accordance with 10CFR50.54(a)(3), as a reduction in commitment to the Operational Quality Assurance Program (CQAP). Therefore, included with this change as required are the following:

- All pages affected by the change are attached and indicated by brackets.
- Identification of the changes
- The reason for the change.
- The basis for concluding that the revised program incorporating the changes continues to satisfy the criteria of 10CFR50, Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC.

#### 1. IDENTIFICATION OF CHANGE

In Section I, page 1 of 4, Subsection B, ORGANIZATION, paragraph 6, second and third sentences, "As a direct report of the Vice President, Nuclear Safety and Regulatory Affairs, he shall have the direct access to other senior management positions and shall maintain effective communications with them on quality matters under their cognizance. The Quality Programs Manager shall report regularly to the Vice President, Nuclear Safety and Regulatory Affairs and Plant Manager on the effectiveness of the Program."

#### REASON FOR THE CHANGE

The change in the reporting relationship of the Quality Programs manager is part of a larger realignment of nuclear safety functions under a single Company Officer. The reasons behind this larger organizational change are discussed below.

A strong nuclear safety culture rests upon the involvement and commitment of all personnel in an organization. It's the distributed nature of a "safety first" attitude which leads to strong safety performance.

However, distributed ownership of the processes upon which a safety culture depends is not optimum. The closer we can align the ownership of nuclear safety processes, the more synergy we create amongst related processes and more value those processes can add back to the safety culture.

Key nuclear safety processes include:

- the Learning Process,
- the internal oversight processes and functions of quality assurance,
- the external oversight functions and processes such as NSARC,
- the 10CFR50.59 safety evaluation process,
- the licensing basis maintenance processes (such as FSAR updating and commitment tracking), and
- the safety issue resolution functions that lie at the heart of a strong licensing organization

Presently, these processes are distributed throughout the Maine Yankee organization. While this organization is workable, we would receive enhanced safety benefit and be better served by another approach. Accordingly, we are realigning the key nuclear safety processes into a single organization - the Nuclear Safety and Regulatory Affairs Division.

This organization will provide some natural marriages between functions. For instance, the quality assurance and corrective action program(i.e., Learning Process) functions will be united. The ownership of the 50.59 process will reside with the license basis maintenance function. We'll explicitly recognize the importance of the external oversight functions by providing a manager to coordinate those functions with the Maine Yankee organization. And, the safety issue resolution responsibility of licensing will be emphasized, including the creation of a plant licensing section.

Initially, the quality assurance, Learning Process and licensing groups will be combined with little change in internal organizational structure. As we mature, however, we expect evolutionary organization changes and cross-sectional training and experience to be routine.

Besides combining into a single division and changing some names, the immediately apparent organization changes are:

- To cement the connection between the quality assurance and corrective action functions, the Learning Process Manager and Team will report to the QPD Manager. And, to emphasize the importance of the Learning Process, it will remain at a manager level.
- A new position of Manager, Nuclear Safety Oversight has been created to ensure we obtain the maximum value from our oversight functions such as the Nuclear Committee of the Board, the Nuclear Oversight Committee and the Nuclear Safety Audit & review Committee.
- The Ownership of the 10CFR50.59 process has been transferred from the NSE section in QPD, to the safety issues sections of the Regulatory Affairs department, which is also responsible for license basis maintenance.

- The NSE section has been moved from QPD to the Regulatory Affairs department to form the kernel of the plant licensing section. This section will be responsible for LER's, Technical Specification expertise, operability recommendations, notice of violation responses, regulatory inspection interface, and related functions.

Realignment of these functions will provide added value to our safety culture. However, they cannot, on their own, strengthen safety culture without the consistent involvement and commitment of each Maine Yankee employee.

BASIS FOR CONCLUDING THAT THE REVISED PROGRAM INCORPORATING THE CHANGE CONTINUES TO SATISFY THE CRITERIA OF APPENDIX B AND THE SAFETY ANALYSIS REPORT QUALITY ASSURANCE PROGRAM DESCRIPTION COMMITMENTS PREVIOUSLY ACCEPTED BY THE NRC:

Review of the 10CFR50 Appendix B, revealed no specific requirements regarding organizational reporting structure. This change only affects to whom the Quality Programs Manager directly reports. The change does not impede the Manager's ability to have direct access and communication with the President. Measures remain in place to satisfy the following requirements related to such persons performing quality assurance functions:

- Criterion I., first paragraph, fifth sentence states, "The person and organizations performing quality assurance functions shall have sufficient authority and organizational freedom to identify quality problems; to initiate, recommend, or provide solutions; and to verify implementations of solutions."
- Criterion I., first paragraph, sixth sentence states, "Such persons and organizations performing quality assurance functions shall report to a management level such that this required authority and organizational freedom, including sufficient independence from cost and schedule when opposed to safety considerations are provided."
- Criterion I., first paragraph, seventh sentence states, "Because of the many variables involved, such as the number of personnel, the type of activity being performed, and the location or locations where activities are performed, the organizational structure for executing the quality assurance program may take various forms provided the persons and organizations assigned the quality assurance functions have this required authority and organizational freedom."

The Vice President, Nuclear Safety and Regulatory Affairs possesses sufficient independence of both costs and scheduling to ensure that the programs under his oversight are effectively administered and appropriately applied. The Quality Programs Manager is organizationally a direct report of the Vice President, Nuclear Safety and Regulatory Affairs, with a direct line of communication with President, Maine Yankee on all matters involving quality and safety. This is explicitly expressed in Section I page 2 of 4 of the Operational Quality Assurance Program.



We expect that the organizational realignment of key nuclear functions, including the revised reporting relationship of the Quality Programs Manager, will facilitate positive changes in Maine Yankee's safety culture, and lead to an enhanced ability to identify, understand and correct conditions adverse to quality.

## 2. IDENTIFICATION OF CHANGE

In Section II. F, page 13 of 15, ANSI STANDARDS AND REGULATORY GUIDES, ANSI N45.2.9 - 1974 add exception and alternative as follows:

### A. EXCEPTION:

Maine Yankee takes exception to the requirement of "protection equivalent of a NFPA Class A, four hour minimum rated facility.

### ALTERNATIVE:

Door, structures, frames and hardware shall be designed to comply with the requirements of a minimum of a two (2) hour fire rating, meeting NFPA No. 232 guidelines.

## REASON FOR CHANGE

Maine Yankee has documented that, as currently configured, the vault used to store quality records presents a two (2) hour exposure fire hazard. Therefore a 2 hour fire rated enclosure would be adequate to protect the records contained within the vault.

## BASIS FOR CONCLUDING THAT THE REVISED PROGRAM INCORPORATING THE CHANGE CONTINUES TO SATISFY THE CRITERIA OF APPENDIX B AND THE SAFETY ANALYSIS REPORT QUALITY ASSURANCE PROGRAM DESCRIPTION COMMITMENTS PREVIOUSLY ACCEPTED BY THE NRC:

The Operational Quality Assurance Program commits Maine Yankee to ANSI N45.2.9, without exceptions. Section 5.6 of this standard requires a single storage facility provide protection equivalent to a 4 hour minimum fire rated facility. The 1981 revised standard changed the fire rating from four (4) hour to two (2) hour rating. The Nuclear Regulatory Commission has endorsed the two (2) hour rating in the NRC Standard Review Plan NUREG 0800, Revision 2, dated July 1981.

## SECTION II

The following changes identified below do not constitute a reduction in commitment to the Operational Quality Assurance Program (OQAP) document. Therefore, included with these changes, as required, are the following:

- All pages affected by the change are attached and indicated by brackets.
- Identification of the changes.
- The reason for the change.

1. Identification of Change: On sign-off page, names removed.  
Reason for Change: Elimination of the need to correlate individuals with positions held.
2. Identification of Change: On sign-off page, Vice President, Nuclear Safety and Regulatory Affairs.  
Reason for Change: Position newly established as part of organizational realignment.
3. Identification of Change: ATTACHMENT 1, DATE and FROM:  
Reason for Change: To accurately reflect current date and new President, Maine Yankee
4. Identification of the change: Section I.B., page 1 of 4, third paragraph, changed to indicate a change in title for the Vice President of Licensing and Engineering to that of Vice President of Engineering. Change includes the creation of a new position - Vice President of Nuclear Safety and Regulatory Affairs.  
Reason for Change: Reorganization of the Engineering Division and creation of the Nuclear Safety and Regulatory Affairs Division.
5. Identification of the change: Section I.B., page 1 of 4, fourth paragraph, changed NSEG to Quality Programs Department.  
Reason for Change: Administrative change was made in Revision 8 of Maine Yankee's Operational Quality Assurance Program but was not reflected in Revision 10.
6. Identification of the change: Section I.B., page 2 of 4, third paragraph, deleted the last three sentences and added the following: "The Maine Yankee Engineering Support Manager is assigned the responsibility to ensure that YNSD provides the services assigned."  
Reason for Change: To clarify and better define the organizational interface between Nuclear Services Division of (Yankee) and Maine Yankee Atomic Power Company.

7. Changes to the Organizational Chart in Section I, page 4 of 4.

Identification of Change: A Vice President position was established to be responsible for Nuclear Safety and Regulatory Affairs.

Reason for Change: Realignment of the organization.

Identification of Change: Elevated position of General Counsel to Vice President and General Counsel.

Reason for Change: The position of Vice President and General Counsel established as part of the organizational realignment.

Identification of Change: Graphic depiction of the relationship of the Chairman of NSARC.

Reason for Change: To graphically display the reporting relationship for the Chairman of NSARC.

Identification of Change: Realignment of duties for Vice President of Licensing and Engineering and change in title.

Reason for Change: Maine Yankee determined that Licensing should be realigned under the newly established position of Vice President, Nuclear Safety and Regulatory Affairs.

Identification of Change: Elimination of the title Manager, Corporate Engineering.

Reason for Change: The duties of that position will be assumed by the newly created positions of Manager, Configuration Management; Manager, Design Engineering; and Manager, Engineering Programs.

Identification of Change: Elimination of title of Manager, Licensing and Engineering Support.

Reason for Change: The duties of the position will be assumed by the positions of Manager, Engineering Support and Manager, Regulatory Affairs.

Identification of Change: Established position of Manager, Project Management and Construction.

Reason for Change: Established to provide a supporting structure for Maine Yankee's Project Management and Construction initiatives.

<u>Identification of Change:</u>	Established position of Manager, Information Systems, reporting to the Vice President, Financial and Administration.
<u>Reason for Change:</u>	Dedicate resources to develop Information Systems.
<u>Identification of Change:</u>	Established position of Senior Manager, Outage reporting to Vice President, Operations.
<u>Reason for Change:</u>	Clearly define responsibilities for and dedicate resources to outages.
<u>Identification of Change:</u>	Eliminated position of Outage Manager.
<u>Reason for Change:</u>	Positions duties will be assumed by Senior Manager, Outage as indicated above.
<u>Identification of Change:</u>	Security Director reports to the Vice President, Operations instead of Manager, Technical Support.
<u>Reason for Change:</u>	Maine Yankee determined that this was a more effective reporting chain.
<u>Identification of Change:</u>	Established position of Director, Industrial Safety.
<u>Reason for Change:</u>	Maine Yankee determined that this was a more effective reporting chain.
<u>Identification of Change:</u>	Established position of Manager, Learning Process reporting to Manager, Quality Programs Department.
<u>Reason for Change:</u>	Maine Yankee determined that this was a more effective reporting chain.
<u>Identification of Change:</u>	Established position of Manager, Nuclear Oversight.
<u>Reason for Change:</u>	Clearly define responsibilities for and dedicate resources to oversight functions.
<u>Identification of Change:</u>	Graphic depiction of the relationship of the Worker's Concern Program Administrator including direct access to the President, Maine Yankee.
<u>Reason for Change:</u>	To graphically display the reporting relationship of the program within the organization.
<u>Identification of Change:</u>	Established position of Manager, Regulatory Affairs.
<u>Reason for Change:</u>	The position of Manager, Licensing and Engineering Support was eliminated as indicated above. The duties the position will be assuming are ownership of the 10CFR50.59 process and license basis maintenance.



- Identification of Change: Eliminated position of Vice President of Nuclear Services.
- Reason for Change: To clarify and better define the organizational interface between Nuclear Services Division of (Yankee) and Maine Yankee Atomic Power Company
8. Identification of Change: Section II.A., first paragraph, first and second sentences, page 1 of 15, Vice President, Engineering.
- Reason for Change: Change in title as indicated above.
9. Identification of Change: Section II.C., page 1 of 15, NOTE 2, "Revisions to the specified standards and guides will be considered for applicability to the Maine Yankee Operational Quality Assurance Program upon written direction thereof by the Nuclear Regulatory Commission."
- Reason for Change: Change to location from which information is disseminated from the NRC.
10. Identification of Change: Section II. C, NOTE 4 (c), page 2 of 15, "Changes that do not reduce QA Program commitments shall be submitted to the NRC in accordance with 10CFR50.54(a)(3) and 10CFR50.71(e)(4).
- Reason for Change: To reflect changes to the 10CFR50 standard.
11. Identification of Change: Section II.D, page 2 of 15, first and second sentences, "The . . . under the direction of the President. . . The Chairman (NSARC) shall bring unresolved issues to the attention of the Maine Yankee President."
- Reason for Change: The Chairman (NSARC) no longer reports to the position of Vice President, YNSD, it instead reports directly to the President of Maine Yankee.
12. Identification of Change: Section II. E (2), end of sentence, page 3 of 15. Change of "and Appendix A of 10CFR55." to "and 10CFR50.120.
- Reason for Change: Reference cited has been revised and incorporated under 10CFR50.120 to meet the intent of Section II E (2) of the Operational Quality Assurance Program.
13. Identification of Change: Section III. B (2), first sentence, page 1 of 3, "The Vice President, Engineering shall be responsible for:"
- Reason for Change: Realignment of duties discussed above.

14. Identification of Change: Section III. B (5), first sentence, page 3 of 3, "The Manager, Engineering Support, via YNSD services shall is responsible for:"  
Reason for Change: Realignment of the working relationship with YNSD.
15. Identification of Change: Section IV. B (3), first sentence, page 2 of 2, "The Vice President, Engineering shall be responsible for:"  
Reason for Change: Realignment of duties discussed above.
16. Identification of Change: Section V. B (3), first sentence, page 1 of 1, "The Vice President, Engineering shall be responsible for:"  
Reason for Change: Realignment of duties discussed above.
17. Identification of Change: Section VI. B (3), first sentence, page 2 of 2, "The Engineering Division shall be responsible for:"  
Reason for Change: Realignment of duties discussed above.
18. Identification of Change: Section IX. B (2), first sentence, page 1 of 2, "The Engineering Division shall be responsible for:"  
Reason for Change: Realignment of duties discussed above.
19. Identification of Change: Section XI. B (2), first sentence, page 1 of 2, "The Engineering Division shall be responsible for:"  
Reason for Change: Realignment of duties discussed above.
20. Identification of Change: Section XV. B (3), first sentence, page 2 of 2, "The Engineering Division shall be responsible for:"  
Reason for Change: Realignment of duties discussed above.

21. Identification of Change:

Section XVI. B (2), page 1 of 1, added the following section relevant to the newly established Learning Process Department and their responsibilities.

"2. The Learning Process Department shall be responsible for:

a. Establishing procedures which prescribe:

(1) Identification and correction of conditions adverse to quality.

(2) Significant conditions adverse to quality, the cause, and action taken to preclude repetition are documented and reported to management."

Reason for Change:

To strengthen the Operational Quality Assurance Program relevant to the identification, control and documentation of conditions adverse to quality and corrective action taken to preclude repetition.

22. Identification of Change:

Section XVI. B (3), first sentence, page 1 of 1, "The Engineering Division shall be responsible for:"

Reason for Change:

Realignment of duties discussed above.

22. Identification of Change:

Appendix C.

Reason for Change:

Revision 4 to the Quality Assurance Program Approval for Radioactive Material Packages.