

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 11, 1998



MEMORANDUM TO: Loren Plisco, Director  
Division of Reactor Projects  
Region II

FROM: Herbert N. Berkow, Director  
Project Directorate II-2  
Division of Reactor Projects - I/III  
Office of Nuclear Reactor Regulation

SUBJECT: CATAWBA NUCLEAR STATION - RESPONSE TO TIA 97-14,  
FREQUENCY REQUIREMENTS FOR QUALITY ASSURANCE AUDITS  
(TAC NOS. M98929 AND M98930)

By memorandum dated June 5, 1997, Region II requested that NRR perform a technical review of Catawba's Quality Assurance (QA) Topical Report, which was prepared for Duke Power facilities in general. The purpose of the review was "to determine if, for Catawba specifically, but all Duke facilities in general, the changes to the report of only placing an audit frequency on Category 1 [defined by the licensee as safety-related components and services] functions met the intent stated in the licensee's justification for removing all the audit frequencies from the TS [Technical Specifications] Section 6.5.2.9, by Amendment Nos. 96 and 90." Those amendments dealt with the relocation of audit frequency provisions from the Technical Specifications into the QA program. Currently, QA audits are only required for the licensee-defined QA Category 1 functions.

The safety evaluation attached to this memorandum provides details prepared by the NRR Quality Assurance, Vendor Inspection, and Maintenance Branch. We have concluded that the licensee modified its QA program in accordance with the licensing submittals provided as part of License Amendments 96 and 90.

We would like to note that for certain nonsafety-related audits, the Nuclear Safety Review Board remains responsible for the conduct of the associated audits in accordance with Technical Specification provisions.

This completes our efforts on the subject TIA. If you have any questions, please contact the Catawba project manager, Peter Tam (301-415-1451).

Docket Nos. 50-413 and 50-414

Attachment: Safety Evaluation

cc w/att: C. W. Hehl, RI  
G. E. Grant, RIII  
T. P. Gwynn, RIV

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Handwritten signature of Herbert N. Berkow in black ink.

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

CATAWBA NUCLEAR STATION

DOCKET NOS. 50-413 AND 50-414

FREQUENCY REQUIREMENTS FOR QUALITY ASSURANCE AUDITS

(REGION II TIA 97-014)

1.0 INTRODUCTION

By memorandum, J. R. Johnson to H. N. Berkow, dated June 5, 1997, Region II requested that NRR perform a technical review of Catawba's Quality Assurance (QA) Topical Report, which was prepared for Duke Energy Corporation (previously Duke Power Company) facilities in general. The purpose of the review was "to determine if, for Catawba specifically, but all Duke facilities in general, the changes to the report of only placing an audit frequency on Category 1 [defined by the licensee as safety-related components and services] functions met the intent stated in the licensee's justification for removing all the audit frequencies from the TS [Technical Specifications] Section 6.5.2.9, by Amendment Nos. 96 and 90." Those amendments dealt with the relocation of audit frequency provisions from the TS into the QA program. Currently, QA audits are only required for the licensee-defined QA Category 1 functions.

The NRR Quality Assurance, Vendor Inspection, and Maintenance Branch (HQMB) has performed a review of the Catawba QA Topical Report.

2.0 BACKGROUND

Technical Specification (TS) Section 6.5.2.9 had originally stated that audits performed under the cognizance of the Nuclear Safety Review Board (NSRB) would be performed at specific frequencies. By letter dated December 18, 1991, the licensee proposed to delete the prescriptive audit frequencies in the TS; however, the QA program commitments for the conduct of audits was to be modified. Specifically, the licensee's letter stated:

Audit frequencies are being deleted here but in the revised QA Topical we are preparing the following statement, using SRP [Standard Review Plan] 17.3 guidance on planned and periodic assessment scheduling and resource allocation: "Audits of selected aspects of operational phase activities are performed with a frequency commensurate with safety significance and in such a manner as to assure that an audit of all safety-related functions is completed within a period of two (2) years. The audit system is reviewed periodically and revised as necessary to assure coverage commensurate with the current and planned activities."

The staff's associated Safety Evaluation (SE) stated that "audit frequency requirements are now addressed in the Duke Quality Assurance Topical and are performance based on the safety significance and extent of activities."

The Duke QA program 17.3.3.2.2 states that:

Audits of selected aspects of operational phase activities are performed with a frequency commensurate with safety significance and in such a manner as to ensure that an audit of all QA Condition 1 functions is completed within a period of two (2) years. The audit system is reviewed periodically and revised as necessary to assure coverage commensurate with current and planned activities.

Further, the Introduction of the Duke QA program defined QA Condition 1 as:

QA Condition 1 covers those systems and their attendant components, items, and services which have been determined to be nuclear safety related. These systems are detailed in the Safety Analysis Report applicable to each nuclear station. The Topical report applies in its entirety to systems, components, items, and services identified as QA Condition 1.

We conclude that the licensee modified its QA program in accordance with the licensing submittals provided to support License Amendment Nos. 96 and 90, as accepted by the staff's SE. There was no licensee commitment to relocate explicit audit frequency provisions for other than safety-related audits, nor was a relocation of all audit frequencies a condition of the staff's SE. The Duke QA program provides for a graded application of quality controls based on safety significance (QA Conditions 1 through 4).

For the categories of nonsafety-related audits (such as for QA Condition 3 fire protection area) the licensee is still encumbered with implementing the TS provisions. The NSRB remains responsible for (1) review of Quality Verification Department audits relating to station operations and actions taken in response to those audits (Section 6.5.2.8.i), and (2) audits of fire protection (Sections 6.5.2.9.g and .h). The NSRB would need to be able to justify the adequacy of the audit periodicity for nonsafety-related fire protection audits that are under their cognizance.

### 3.0 CONCLUSION

The Duke QA program was modified in accordance with the licensee's submittals associated with License Amendments 96 and 90 that resulted in a relocation of audit frequency provisions.

Principal Contributors: Robert Gramm  
Edward J. Ford

Date: March 11, 1998