



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 12, 1995

MEMORANDUM TO: Suzanne C. Black, Branch Chief  
Quality Assurance and Maintenance Branch  
Division of Reactor Controls and Human Factors

FROM: Walter P. Haass, Quality Assurance Section  
Quality Assurance and Maintenance Branch

SUBJECT: SUMMARY OF THE NEI MEETING ON THEIR PETITION TO AMEND  
10 CFR 50.54

On August 29, 1995, representatives of NEI met at OWFN with members of the NRC staff to discuss the NEI rulemaking petition to modify the regulatory requirements, as currently codified in 10 CFR 50.54(a), for changing licensee quality assurance programs. Attendees at the meeting are identified in Attachment 1.

NEI's objective in submitting the petition is to revise the present requirement so as to assure the focus of staff and licensee personnel on quality assurance issues that are most important to safety and to eliminate the reporting and review of programmatic changes that are considered of less significance. The latter changes could be implemented by the licensee without prior NRC review and approval. It was estimated that all licensees as a group could save about \$1 million annually if the proposed revision is enacted.

Much discussion was devoted to how licensees would delineate between programmatic changes requiring NRC review and those that could be implemented without prior review. Issues such as departure from commitments made to regulatory guides and industry standards, and organizational changes that reduce the responsibility and authority of the quality assurance function were discussed as to whether these changes would require reporting and review prior to implementation. The NEI representatives indicated that they have not yet defined what types of changes would be necessary to submit under the proposed requirement. A concern was also discussed regarding how NRC inspectors would treat unreportable programmatic changes. The latter changes would be reported periodically in accordance with 10 CFR 50.71(e).

The NEI representatives indicated that there would likely be a need for a self-assessment function by licensees to determine whether a decrease in the effectiveness of their quality assurance programs was occurring as a result of programmatic changes.

The NEI representatives stated that they were in the process of developing guidance that would be used to assist licensees in implementing the revised change controls. Conceptually, it is planned to supplement NSAC/125, "Guidelines for 10 CFR 50.59 Safety Evaluations" dated June 1989. The NEI representatives indicated that NEI would like to meet again with the NRC in the October timeframe to discuss the guidance.

OTHER ISSUES DISCUSSED

Other global issues discussed included:

- Revisions to the NEI graded QA guidance, including the expert panel, would be available in the Fall, 1995.
- There would be a NEI/QA managers forum held at least annually to discuss QA matters.
- Optional criteria would be developed by NEI for the qualifications of lead auditors.
- Performance-based audit frequency criteria would be developed by NEI.
- NEI representatives expressed their view that pilot programs (e.g., graded quality assurance) should consist of at least six licensees to be representative of the industry rather than individual licensees.
- NEI will be submitting a petition for rulemaking to provide for a performance-based alternate to Appendix B.

CONCLUSION:

The NRC staff and the NEI representatives agreed to meet in the near future to continue the dialogue on the guidance for the 50.54(a) petition.

Attachment: Meeting Attendance List

DISTRIBUTION:

Central Files/PDR  
 NRC meeting attendees  
 GMizuno  
 AThadani  
 BBoger  
 MModes, RI  
 JBlake, RII  
 MJordan, RIII  
 WAng, WCFO

\* PREVIOUS CONCURRENCE

DOCUMENT NAME:G:\NEIMTG54

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

OFFICE	DRCH/TQMB	DRCH/TQMB	E	DRCH/TQMB	E				
NAME	WHAASS	RGRAMM	RG	SBLACK	SB				
DATE	9/7/95*	09/12/95		09/12/95		09/ /95		09/ /95	

OFFICIAL RECORD COPY

USNRC  
MEETING ATTENDANCE LIST  
50.54(a) PETITION

August 29, 1995

Robert Gramm, NRR/HQMB  
Tom Martin, RES/REG Dave Cop.  
Adrian Heymer, NEI  
Steve Floyd, NEI  
James Taylor-Brown, Entergy Operations, Inc.  
Mike Knapch, McGraw-Hill  
Mike Schoppman, FP&L  
Theresa Sutter, Bechtel  
Mack Cutchin, NRC/OGC  
Ted Heatherly, STS  
Juan Peralta, NRC/NRR/HQMB  
C.W. Nilsen, NRC/RES  
Walter P. Haass, NRC/NRR/DRCH/HQMB  
Hans Renner, NUS  
Suzanne Black, NRC/NRR/DRCH/HQMB  
Michael Lesar, NRR/ADM  
David L. Meyer, NRC/ADM  
Lee Russell, BGE  
Lee Spessard, NRC/NRR/DRCH  
Melinda Malloy, NRR/ADPR