

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
OFFICE OF NUCLEAR REACTOR REGULATION  
WASHINGTON, D.C. 20555-0001

December 12, 1995

NRC ADMINISTRATIVE LETTER 95-06: RELOCATION OF TECHNICAL SPECIFICATION  
ADMINISTRATIVE CONTROLS RELATED TO QUALITY  
ASSURANCE

Addressees

All holders of operating licenses or construction permits for nuclear power reactors.

Purpose

The U.S. Nuclear Regulatory Commission (NRC) is issuing this administrative letter to inform licensees about recent experiences involving the relocation of technical specification administrative controls related to quality assurance. Any license amendment request related to the content of this Administrative Letter is voluntary. This Administrative Letter does not transmit or imply any new or changed requirements or staff positions. No specific action or written response is required.

Background

Among U.S. Nuclear Regulatory Commission efforts related to technical specification improvements are the issuance of a revision to 10 CFR 50.36, revisions to the Standard Technical Specifications, some generic communications, and many individual license amendments. The revision of 10 CFR 50.36 included specific criteria for determining those design conditions that warrant inclusion in technical specifications as limiting conditions for operation. The staff has reviewed and approved many recent amendment requests that involved incorporating parts of the improved Standard Technical Specifications, relocating requirements that do not satisfy the criteria of 10 CFR 50.36 for inclusion as limiting conditions for operation, and relocating requirements that are controlled directly by regulations and related licensee programs. The relocation of technical specification requirements has included administrative controls as well as limiting conditions for operations and related surveillance requirements.

Increasingly, licensees are requesting amendments to technical specifications that are located in the "administrative controls" section and are related to quality assurance programs. Licensees have frequently requested amendments to these specifications because they contain detailed information that is affected by organizational and process changes. Many licensees have revised their technical specifications to remove excessive detail, thereby gaining flexibility in making organizational changes without the need for a license amendment. Recent amendment requests related to quality assurance have also followed the trend for other technical specifications and have included

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moving requirements to licensee controlled documents and programs. The quality assurance program is a logical candidate for such relocations due to the controls imposed by such regulations as Appendix B to 10 CFR Part 50, the existence of U.S. Nuclear Regulatory Commission-approved quality assurance plans and commitments to industry quality assurance standards, and the established quality assurance program change control process in 10 CFR 50.54(a). The relocation of technical specification requirements in cases where adequate controls are provided by such other methods can reduce the resources spent by licensees and the U.S. Nuclear Regulatory Commission staff in preparing and reviewing license amendment requests.

### Discussion

The staff has reviewed the content of typical technical specification administrative controls related to quality assurance requirements, for those plants that have not converted to the improved Standard Technical Specifications, and compared them to established staff positions and recent amendment requests. On the basis of this review, the staff offers the following observations (which do not go beyond established staff positions) in order to assist those licensees considering amendment requests related to quality assurance requirements:

#### Independent Safety Engineering Group

The existing technical specification requirements related to an independent safety engineering group function may be relocated. The review of any license amendments related to the relocation of the independent safety engineering group function can be facilitated by licensee references to an existing quality assurance plan commitment or the simultaneous submittal of a revision of the quality assurance plan which incorporates the independent safety engineering group functions. As a minimum, the quality assurance plan should contain a commitment related to the functions of the independent safety engineering group organization to a level of detail comparable to that previously contained in the technical specifications. The review process becomes simpler if the existing independent safety engineering group requirements presently in the technical specifications are relocated intact to the quality assurance plan. Any subsequent changes to the independent safety engineering group provisions incorporated into the quality assurance plan would be controlled in accordance with 10 CFR 50.54(a).

#### Reviews and Audits

The technical specification requirements related to review and audit requirements may be relocated to the quality assurance plan. The review of any license amendments related to the relocation of the review and audit functions can be facilitated by licensee references to an existing quality assurance plan commitment or the simultaneous submittal of a revision to the quality assurance plan including the relocated requirements. Commitments may be incorporated into the quality assurance plan by relocating the existing technical specifications intact or by capturing existing structural and administrative requirements by a description of the review and audit

organizations and referencing appropriate industry quality assurance standards such as American National Standards Institute standard N18.7, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," that explicitly duplicate current technical specification provisions. Subsequent changes to the relocated requirements would be controlled in accordance with 10 CFR 50.54(a).

The commitments incorporated into the quality assurance plan may revise existing technical specification audit frequencies by implementation of a performance-based schedule (schedule adjusted according to objective evaluation of plant functional area performance) provided that the maximum audit interval does not exceed the 2-year interval specified in ANSI N18.7. Exceptions to the allowable use of performance-based audit frequencies are: (1) those audit intervals defined by regulations, such as for emergency and security plans, and (2) triennial audits of fire protection plans, conducted by outside qualified fire consultants, which should be maintained in accordance with current technical specification requirements. In addition to changing existing "annual" fire protection audits to a "maximum interval of 24 months," if justified by performance reviews, ongoing U.S. Nuclear Regulatory Commission and industry initiatives may lead to additional changes in the audit practices related to fire protection. In the interim, however, triennial audits conducted by outside qualified fire consultants are being maintained in accordance with the staff positions expressed at various meetings and in correspondence.

#### Procedure Review Process

Existing technical specifications typically contain requirements for the processes related to the review and approval of procedures and changes to procedures. These requirements may be relocated to the quality assurance plan. The review of license amendments related to the relocation of the procedure review processes can be facilitated by licensee references to an existing quality assurance plan commitment or the simultaneous submittal of a revision of the quality assurance plan including a commitment related to the relocated technical specification requirements. As a minimum, the quality assurance plan should contain a commitment to process procedures and procedure changes in accordance with an accepted standard such as ANSI N18.7. Site-specific aspects currently in technical specifications, that do not duplicate ANSI N18.7 provisions, should be relocated to the quality assurance plan. Relocation of the technical specification requirements in this manner, basically relocating them intact to the quality assurance plan, simplifies the U.S. Nuclear Regulatory Commission license amendment review. Any subsequent changes to these provisions would be controlled in accordance with 10 CFR 50.54(a).

#### Records and Record Retention


Technical specification administrative controls typically contain record requirements for particular specifications (such as independent safety engineering group and review and audit functions), as well as a section on general requirements for record retention. These sections may be removed from the technical specifications and placed in the quality assurance plan. The

review of any license amendments related to the relocation of requirements related to records or record retention can be facilitated by licensee references to an existing quality assurance plan commitment or by the simultaneous submittal of a revision of the quality assurance plan that incorporates the relocated technical specification requirements. As mentioned above, the review process is less complicated if the requirements are moved intact to the quality assurance plan. For those current technical specification requirements that are explicitly duplicated in accepted industry standards, reference to those standards is sufficient. Any subsequent changes to these provisions would be controlled in accordance with 10 CFR 50.54(a).

#### Other Changes

The current 10 CFR 50.54(a) change control process requires prior U.S. Nuclear Regulatory Commission review and approval of reductions in commitments contained in the quality assurance plan. In response to a recent petition for rulemaking, the staff is evaluating the 10 CFR 50.54(a) threshold at which U.S. Nuclear Regulatory Commission approval of quality assurance plan changes is required. In addition to the 50.54(a) petition, licensees and the U.S. Nuclear Regulatory Commission staff have recently discussed proposed changes to quality assurance provisions that go beyond those discussed in this administrative letter. Although such proposed changes may ultimately be found to be acceptable, this administrative letter is limited to existing staff positions and lessons learned related to the relocation of technical specification requirements.

This administrative letter requires no specific action or written response. If you have any questions about this letter, please contact the person listed below or the appropriate Office of Nuclear Reactor Regulation project manager.

  
Dennis M. Crutchfield, Director  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

Contact: William Reckley, NRR  
(301) 415-1314

Attachment:  
List of Recently Issued NRC Administrative Letters

LIST OF RECENTLY ISSUED  
NRC ADMINISTRATIVE LETTERS

Administrative Letter No.	Subject	Date of Issuance	Issued to
95-05	Revisions to Staff Guidance for Implementing NRC Policy on Notices of Enforcement Discretion	11/07/95	All holders of OLs or CPs for nuclear power reactors.
95-04	NRC Program Office responsibilities for Decommissioning Activities and Planning for Dry Cask Storage of Spent Fuel	11/07/95	All holders of OLs & CPs for nuclear power reactors.
95-03	Availability of Reactor Vessel Integrity Database	08/04/95	All holders of OLs or CPs for nuclear power reactors.
94-13, Rev. 1	Access to Nuclear Regulatory Commission Bulletin Board Systems	06/29/95	All NRC licensees.
95-02	Cost Beneficial Licensing Actions	02/23/95	All holders of OLs or CPs for nuclear power reactors.
95-01, Supp. 1	Change in Commercial Telephone and Facsimile Numbers at Nuclear Regulatory Commission Headquarters	02/02/95	All NRC licensees.
95-01	Change in Commercial Telephone and Facsimile Numbers at Nuclear Regulatory Commission Headquarters	01/23/95	All NRC licensees.
94-17	Addressing Correspondence to the NRC	12/15/94	All holders of OLs or CPs for nuclear power reactors.
94-16	Revision of NRC Core Inspection Program for Annual Emergency Preparedness Exercise	11/30/94	All holders of OLs or CPs for nuclear power reactors.

OL = Operating License  
CP = Construction Permit

review of any license amendments related to the relocation of requirements related to records or record retention can be facilitated by licensee references to an existing quality assurance plan commitment or by the simultaneous submittal of a revision of the quality assurance plan that incorporates the relocated technical specification requirements. As mentioned above, the review process is less complicated if the requirements are moved intact to the quality assurance plan. For those current technical specification requirements that are explicitly duplicated in accepted industry standards, reference to those standards is sufficient. Any subsequent changes to these provisions would be controlled in accordance with 10 CFR 50.54(a).

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orig /s/'d by DMCrutchfield  
 Dennis M. Crutchfield, Director  
 Division of Reactor Program Management  
 Office of Nuclear Reactor Regulation

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Attachment:  
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DOCUMENT NAME: 95-06.AL

TechEd reviewed this document 10/25/95

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OFFICE	NRR	E	SC/HQMB:NRR	C/OTSB:NRR	C/PECB:NRR
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DATE	10/19/95		10/20/95	10/24/95	11/22/95

OFFICE	D/DRM
NAME	DMCrutchfield
DATE	12/7/95

incorporates the relocated technical specification requirements. As mentioned above, the review process is less complicated if the requirements are moved intact to the quality assurance plan. For those current technical specification requirements that are explicitly duplicated in accepted industry standards, reference to those standards is sufficient. Any subsequent changes to these provisions would be controlled in accordance with 10 CFR 50.54(a).

Comment

The staff recognizes that the current 10 CFR 50.54(a) change control process is restrictive in that it requires prior U.S. Nuclear Regulatory Commission review and approval of reductions in commitments contained in the quality assurance plan. In response to a recent petition for rulemaking, the staff will evaluate the 10 CFR 50.54(a) threshold for obtaining U.S. Nuclear Regulatory Commission approval of quality assurance plan changes. In addition to the 50.54(a) petition, licensees and the U.S. Nuclear Regulatory Commission staff have recently discussed proposed changes to quality assurance provisions that go beyond those discussed in this Administrative Letter. Although such proposed changes may ultimately be found to be acceptable, this Administrative Letter is limited to existing staff positions and lessons learned related to the relocation of technical specification requirements.

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Dennis M. Crutchfield, Director  
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Office of Nuclear Reactor Regulation

\*See previous concurrence

OFC	SEND	HQMB:DRCH:NRR	SC:HQMB:DRCH:NRR	BC:HQMB:DRCH:NRR	C:SPLB:NRR	C:OTSB:NRR
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DATE	PDR?	<i>1/195</i>	<i>1/195</i>	10/25/95*	<i>1/195</i>	<i>1/195</i>
COPY?	Yes No	Yes No	Yes No	Yes No	Yes No	Yes No

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Comment

The staff recognizes that the current 10 CFR 50.54(a) change control process is restrictive in that it requires prior NRC review and approval of reductions in commitments contained in the QAP. In response to a recent petition for rulemaking, the staff will evaluate the 10 CFR 50.54(a) threshold for obtaining NRC approval of QAP changes. In addition to the 50.54(a) petition, licensees and the NRC staff have recently discussed proposed changes to QA provisions that go beyond those discussed in this AL. Although such proposed changes may ultimately be found to be acceptable, this AL is limited to existing staff positions and lessons learned related to the relocation of TS requirements.

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*Per call from J. Conran 11/14  
CRGR has no objection.  
7/14/95*

these requirements proposed after their relocation to the QAP would be performed in accordance with 10 CFR 50.54(a).

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