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January 14, 1994

Re: Indian Point Unit No. 2
Docket No. 50-247

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Quality Assurance Program Description Revision

This letter requests approval of a change to our Quality Assurance Program Description (QAPD) Revision 10. This change is in addition to the changes described in a letter dated December 21, 1993 which submitted revision 11 of the QAPD.

The QAPD contains a commitment to comply with Regulatory Guide (RG) 1.33, Revision 2, February, 1978. RG 1.33 endorses American National Standards Institute N18.7-1976/ANS-3.2 "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants" (ANSI 18.7). Section 5.2.15 of ANSI 18.7, 3rd paragraph, requires that "the frequency of subsequent [procedure] reviews shall be specified...." Additionally, Section 5.2.15 of ANSI 18.7, 4th paragraph, requires that "plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable."

We believe that the requirement to periodically (e.g., biennially) review plant procedures, absent a substantive initiating cause, is inefficient and no longer necessary. The continuing increased emphasis on the development and strict use of procedures together with numerous self-assessment processes we have established more than offset the need for a periodic procedure review. As an alternate, for most plant procedures, we plan to rely on a number of established self-assessment processes, which inherently evaluate the need for reviewing and revising procedures. This will result in a more efficient method for procedure updates.

Accordingly, we propose to incorporate the alternate methods in the QAPD in place of current provisions which reflect the ANSI 18.7, 5.2.15 procedure review requirements.

We will assess the effectiveness of these alternate methods in an audit conducted at least every 2 years.

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Although we consider the alternate methods a suitable replacement for the periodic review process for most plant procedures, we intend to continue biennial reviews for non-routine plant procedures and higher tier non-technical plant administrative procedures, i.e., Station Administration Orders (SAO's) and Administrative Directives (AD's). The latter are generally policy documents which may not be evaluated by the self-assessment processes.

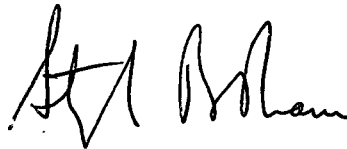
Attachment 1 describes self-assessment processes which evaluate the need for revising procedures.

Attachment 2 contains a description of the page changes and the revised QAPD pages which describe the alternate methods and associated audits.

We believe that the alternate methods do not constitute a reduction in commitment per 10 CFR 50.54(a). However, since the alternate methods are not an exact equivalent to the requirements of ANSI 18.7, your approval is requested prior to implementing the alternate methods.

Upon receipt of your approval, we will implement the alternate methods and incorporate them into the next revision of the QAPD. Should you have any questions regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



cc: Mr. Thomas T. Martin
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Attachment 1

Self-Assessment Processes and
Methods of Procedure Reviews

Self Assessment Processes and Methods of Procedure Reviews

The following processes evaluate the need for revising procedures:

1. The administrative controls for plant modifications stipulate responsibilities for review of plant modifications by plant personnel and the preparation of new or revised operating procedures necessitated by the modification.
2. The administrative controls for nonconformances stipulate consideration of root cause determinations, including incorrect procedures, and provide for corrective action.
3. The administrative controls for the analysis of plant events and significant occurrences provide for determination of root cause and trending including consideration of procedural inadequacies, use of incorrect procedures and corrective action.
4. The operator feedback program, including operator training input, requires that discrepancies, problems and recommended changes to operating procedures be reported to the Operations staff for evaluation and possible procedure revision. This program provides for documenting the proposed change, reasons therefore and a determination of whether applicable requirements of the FSAR and plant Technical Specifications are satisfied.
5. Administrative controls for maintenance provide for identification of procedural inadequacies and evaluations for procedure revision when performing reviews of completed work packages.
6. Station administrative controls provide for a review for adequacy for temporary procedure changes for operating maintenance, technical services and radiation protection procedures.
7. The surveillance test program requires that procedure inadequacies, identified during performance of the procedure be documented and evaluated for revision to the procedure.
8. The operating experience review program provides for the review of NRC Information Notices, INPO Reports and vendor technical equipment information. The evaluation of these various sources of information includes consideration of the adequacy of existing procedures and the need for corrective action.
9. The Quality Assurance Program provides for ongoing audits and surveillances which typically review procedures on a sampling basis in the particular areas chosen. Procedure inadequacies and recommended corrective action or follow-up are identified in the audit or surveillance reports.

10. Licensing correspondence resulting, for example, from NRC inspection reports and NRC generic letters include determination of corrective action (example: procedural revisions). Commitments made are tracked to completion.

Summary

The self-assessment processes discussed above provide ongoing requirements for and opportunities to initiate reviews of procedures and revisions to procedures for specific initiating causes. For frequently used routine plant procedures the assessment processes provide an acceptable alternate to the requirements of ANSI 18.7.

The following types of procedure reviews and associated controls will be accomplished:

1. Routine plant procedures that are used more than every two years shall be reviewed and revised, as necessary, as determined by the self assessment processes described above.
2. Routine plant procedures that have not been used for two years shall be reviewed before use to determine if changes are necessary or desirable.
3. Non-routine procedures (e.g. emergency operating, off normal, emergency plant implementation and other procedures which are event initiated) shall be reviewed every two years and revised as appropriate.
4. Station Administrative Orders (SAOs) and Administrative Directives (ADs) shall be reviewed every two years and revised as appropriate.
5. At least every two years Nuclear Quality Assurance will audit a representative sample of each of the preceding review categories 1 through 4, to evaluate whether the procedure review and revision program is being implemented effectively.