UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE

SOUTHERN CALIFORNIA EDISON

SAN ONOFRE NUCLEAR GENERATING STATION, UNITS 1, 2 AND 3

DOCKET NOS. 50-206, 50-361 AND 50-362

1.0 INTRODUCTION

By letter dated February 6, 1998, Southern California Edison (SCE) transmitted Change Notice 43 to the SCE Quality Assurance Topical Report SCE-1-A Amendment 19 dated December 1997, in accordance with 10 CFR 50.54(a). Change Notice 43 proposes to modify the qualification requirements of lead auditors by relying on the demonstrated ability of lead auditor candidates to effectively implement the audit process and effectively lead an audit team rather than requiring the participation of the lead auditor candidate in a minimum of five quality assurance audits within a three year period prior to qualification. This safety evaluation describes the staff's analysis of the proposed alternative to previously approved provisions for the lead auditor qualifications.

2.0 EVALUATION OF PROPOSED ALTERNATIVE REQUIREMENTS FOR LEAD AUDITOR QUALIFICATION

The licensee's quality assurance program description is contained in SCE Quality Assurance Topical Report SCE-1-A. The licensee is presently committed in its quality assurance program to Section 2.3.4, "Audit Participation," of ANSI N45.2.23-1978, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants," as endorsed by Regulatory Guide 1.146, "Qualification of Quality Assurance Audit Personnel for Nuclear Power Plants," dated August 1980. Section 2.3.4 states the following requirements for the qualification of lead auditors:

"The prospective Lead Auditor shall have participated in a minimum of five (5) quality assurance audits within a period of time not to exceed three (3) years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit within the year prior to the individual's qualification."

As described in the February 6, 1998, submittal, the licensee has proposed the following alternative to the provisions contained in Section 2.3.4 of ANSI N45.2.23-1978:

"Prospective Lead Auditors shall demonstrate their ability to effectively implement the audit process and effectively lead an audit team. This process is described in written procedures which provide for evaluation and documentation of the results of this demonstration. In addition, the prospective Lead Auditor shall have participated in at least one Nuclear Oversight audit within the year preceding the individual's effective date of qualification. Upon successful demonstration of the ability to effectively implement the audit process and effectively lead audits, and having met the other provisions of Section 2.3 of ANSI/ASME N45.2.23-1978, the individual may be certified as being qualified to lead audits."

The staff conducted its review in accordance with the guidance in Section 17.2, "Quality Assurance During the Operational Phase," of NUREG-0800, "Standard Review Plan" (SRP 17.2). The introduction paragraph of Section II, "Acceptance Criteria," of SRP 17.2 contains provisions for the use of alternatives to the acceptance criteria contained in SRP 17.2 provided they are evaluated by the staff and are considered to be in compliance with pertinent NRC regulations.

Based on the staff's review it was determined that the alternative for lead auditor qualification proposed by the licensee represents an acceptable alternative to Item 18B3 of SRP 17.1 which is referenced in the criteria for audits in SRP 17.2. This determination was based on the licensee's proposed quality assurance program controls which require that 1) prospective lead auditors effectively demonstrate their ability to implement the audit process and lead an audit team, 2) this demonstration process be described in written procedures or instructions, 3) the results of the demonstration be evaluated and documented, and 4) regardless of the methods used for the demonstration, the prospective lead auditor shall have participated in at least one nuclear oversight audit within the year preceding the individual's effective date of qualification. In addition to the above, the alternative also states that all other provisions of Section 2.3 of ANSI N45.2.23-1978 regarding qualification of lead auditors will be met prior to the individual's certification.

3.0 CONCLUSION

The staff has determined that the proposed qualification requirements for prospective lead auditors identified in Change Notice 43 to the SCE Quality Assurance Topical Report SCE-1-A Amendment 19 dated December 1997, represent an acceptable alternative to the review criteria contained in Section 17.2 of NUREG-0800 provided that the above described quality assurance program controls are implemented to properly evaluate the demonstrated abilities of prospective lead auditors. The proposed changes are acceptable and continue to meet the pertinent requirements of Appendix B to 10 CFR Part 50.

Principal Contributors: R. Smith
W. Haass

Date:

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Date: March 27, 1998