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SUBJECT: Provides addl info in support of proposed change to QA program submitted by util 930728 ltr re biennial review of procedures for facility.

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Carolina Power & Light Company
Robinson Nuclear Plant
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Robinson File No.: 13510H
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DEC 05 1994

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

**H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
PROPOSED CHANGE TO QUALITY ASSURANCE PROGRAM**

Gentlemen:

By letter dated July 28, 1993, Carolina Power & Light (CP&L) Company submitted to the NRC a request to change CP&L's Quality Assurance (QA) program commitments regarding the biennial review of procedures for the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2. The NRC responded to that request by letter dated November 1, 1993, requesting additional information regarding the change to our QA program description to address items contained within its letter, or to propose equivalent alternatives.

The purpose of this letter is to provide additional information in support of our proposed change to our QA program which is provided in Enclosure 1, and to request review and approval of our requested change. We consider that our proposed change to our QA program is consistent with the NRC accepted programs at Peach Bottom Atomic Power Station, Units 2 and 3, Limerick Generating Station, Units 1 and 2, Davis-Besse Nuclear Power Station, Unit No. 1, Waterford 3 Steam Electric Station, Grand Gulf Nuclear Station - Unit 1, Joseph M. Farley Nuclear Plant, Units 1 and 2, V.C. Summer Nuclear Station, Arkansas Nuclear One, Units 1 and 2, River Bend Station - Unit 1, and Fort Calhoun Station, and should likewise be an acceptable alternative to performing biennial procedure reviews.

Similar to the programs at the Peach Bottom Atomic Power Station, Units 2 and 3 and Limerick Generating Station, Units 1 and 2, our proposed change relies on the self-assessment process together with oversight by our Nuclear Assessment organization, instead of periodic Nuclear Assessment audits, conducted specifically to assess the effectiveness of programs and processes in maintaining procedures current. Self-assessment by each line organization has become a part of the normal conduct of operations at HBRSEP. As such, relying primarily on individual self-assessments as proposed here ensures that the responsibility to maintain procedures current is properly retained by the line organizations that use the procedures. The self-assessment process is required by Nuclear Generation Group policy and associated implementing

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documents, and includes the requirement that line organization self-assessments, including identified weaknesses, be documented and corrective actions be tracked to completion. In addition, a new program for tracking and trending the causes of procedure changes will be implemented after approval of our proposed change to the QA program. This program will aid in identifying any procedure change programs or processes which may be ineffective.

In addition to the self-assessment process, the Nuclear Assessment organization will conduct periodic performance based audits to assess the effectiveness of programs and processes in maintaining procedures current. We consider this to be as effective as a biennial sampling of procedures and in fact, is similar to the NRC accepted programs at V. C. Summer Nuclear Station, Peach Bottom Atomic Power Station, Units 2 and 3, Limerick Generating Station, Units 1 and 2, and Grand Gulf Nuclear Station - Unit 1.

In the letter of November 1, 1993, the NRC indicated that non-routine procedures should continue to be reviewed formally at least every two years and revised as appropriate. Our "non-routine" operating procedures (e.g., Emergency Operating Procedures and Abnormal Operating Procedures) are in fact used routinely during the NRC required initial licensed operator training and the continuing licensed operator requalification training programs. Similarly, Emergency Plan implementing procedures and other procedures used to respond to an emergency are used during periodic NRC required emergency drills and exercises. Such frequent usage of "non-routine" procedures within the framework of the procedure development programs and processes specified in this proposed change to the QA program description has been, and will continue to be, effective in identifying and implementing needed changes and enhancements to this category of procedures. Again, this program is comparable to those approved for the nuclear facilities listed above.

Upon NRC approval of our proposed changes to the QA program description, we will replace the performance of biennial reviews of routine plant procedures with the existing programmatic controls that are delineated in the updated "Proposed Replacement of Biennial Review of Plant Procedures with Programmatic Controls" contained in Enclosure 2 of this letter. We maintain that licensed operator initial and requalification training programs and emergency drills and exercises effectively identify potential deficiencies in "non-routine" procedures and that these programs are consistent with programs at other utilities that have successfully received relief from redundant biennial review. A redundant biennial review of these selected procedures provides marginal benefit to safety.

We have reviewed your comment on infrequently used procedures. The existing HBRSEP procedure review process and programs, as detailed in Enclosure 2 of this letter, are designed to ensure review and revision, if necessary, of applicable plant procedures. Thus, whether a procedure is used frequently or not, the dynamic review process should maintain the HBRSEP procedures current and accurate. Our procedure

for conducting infrequently performed tests or evolutions incorporates the recommendations of the Institute of Nuclear Power Operations Significant Operating Experience Report 91-01, "Conduct of Infrequently Performed Tests or Evolutions," to provide additional management controls to assure proper execution of these infrequently performed activities.

We understand that the NRC is reviewing our proposed changes in accordance with the NRC guideline, "Plant Procedure Review Guidance." In accordance with the NRC guideline and the letter dated November 1, 1993, we have proposed equivalent alternatives to this guidance. These equivalent alternatives have been previously approved for other utilities. Accordingly, precedent has been set by the NRC's approval of a similar QA program change at other utilities and there is no evidence that their QA program change has resulted in any adverse safety consequence.

The primary mechanism to ensure that the delineated programs and processes are maintaining plant procedures is our assessment process. This process is comprised of both individual organizational self-assessments and the independent assessments conducted by the Nuclear Assessment organization. These assessments will provide a high degree of confidence that the delineated programs and processes are effective in maintaining procedures current and addresses the issues in the NRC's internal guidelines describing acceptable attributes of licensee proposed alternate procedure control programs.

Questions regarding this matter may be referred to Mr. Keith Jury at (803) 383-1363.

Yours very truly,



R. M. Krich
Manager - Regulatory Affairs

RES:

Enclosures

c: Mr. S. D. Ebnetter, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP
Mr. W. T. Orders, USNRC Senior Resident Inspector, HBRSEP

HBR 2
UPDATED FSAREnclosure 1
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17.2.2 QUALITY ASSURANCE PROGRAM

17.2.2.1 Operations and Maintenance Quality Assurance Program

The H. B. Robinson (HBR) Operations and Maintenance QA Program is controlled by the policies and requirements of the Corporate QA Program. These policies and requirements are implemented through the Plant Operating Manual and other approved procedures. The program is designed to ensure compliance with the NRC Regulatory Guides and ANSI Standards applicable to the operations phase. The commitment to comply or alternatives for CP&L to follow are presented in Section 1.8 of the FSAR. (See Note)

The Corporate QA Manual is structured similar to the following outline:

<u>SECTION</u>	<u>TITLE</u>
1.0	INTRODUCTION
1.1	CP&L Company Quality Assurance Program
1.2	Scope of Application
1.3	Corporate Quality Assurance Manual Control
1.4	CP&L Management Review of CQA Audit Activities
2.0	ORGANIZATION AND RESPONSIBILITIES
2.1	Scope
2.2	Management Responsibilities
2.3	Quality Assurance Functions
3.0	OPERATING PLANT DESIGN ACTIVITY CONTROL
3.1	Scope
3.2	Responsibilities
3.3	Regulatory Commitments
3.4	Design Process
3.5	Design Change Package
3.6	Safety Evaluation
3.7	Design Change Operability and Closeout
3.8	Temporary Design Changes
3.9	Disposition of Deviations Between Design Documents and Plant Configuration
3.10	Design Interface Control
4.0	PROCUREMENT CONTROL
4.1	Scope
4.2	Responsibility
4.3	Regulatory Commitment
4.4	Approval of Vendors
4.5	Items and Services Procurement by Purchase Order
4.6	Procurement by Contract
4.7	Disposition of Vendor Nonconformances
4.8	Verification of Vendor Activities
4.9	Material Upgrading
4.10	Special Procurement

Note: Section 1.8 Contains CP&L's Commitments to NRC Regulatory Guides and ANSI Standards

8

PROPOSED CHANGE TO UFSAR SECTION 1.8

**HBR2
UPDATED FSAR**

Regulatory Guide 1.33

QUALITY ASSURANCE PROGRAM
REQUIREMENTS (OPERATION) REVISION 2,
FEBRUARY 1978

ANSI Standard N18.7-1976

ADMINISTRATIVE CONTROLS AND QUALITY
ASSURANCE REQUIREMENTS FOR THE
OPERATIONAL PHASE OF NUCLEAR POWER
PLANTS

Comply with the provisions of Regulatory Guide 1.33, Rev. 2, February 1978, and the requirements and recommendations for administrative controls described in ANSI N18.7-1976, except as stated below:

f) Section 5.2.2 titled Procedure Adherence: Temporary changes to approved procedures shall be approved by persons specified in the HBR2 Technical Specifications.

[INSERT g: Section 5.2.15 titled Review, Approval and Control of Procedures, states 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. A revision to a procedure constitutes a procedure review." In lieu of this commitment, H. B. Robinson Steam Electric Plant, Unit No. 2 has programmatic controls in place to continually identify procedure revisions which may be needed to ensure that procedures are appropriate for the circumstance and are maintained current.

10 CFR 50.54(a) REVIEW

PROPOSED REPLACEMENT OF BIENNIAL REVIEW OF PLANT PROCEDURES WITH PROGRAMMATIC CONTROLS

Updated Final Safety Analysis Report (UFSAR) Section 1.8: Description of Changes

UFSAR Section 1.8: Add an exception to the H. B. Robinson Steam Electric Plant, Unit No. 2 commitment to ANSI Standard N18.7-1976 "Administrative Controls and Quality Assurance Requirements for the Operational Phase of Nuclear Power Plants," Section 5.2.15, as endorsed by NRC Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation) Revision 2, February 1978."

Reason for Change

In accordance with our commitment to ANSI Standard N18.7-1976, "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants," the affected procedures are reviewed biennially as specified in UFSAR Section 1.8. UFSAR Section 1.8 is cross-referenced in Section 17.2.2.1 and makes adherence to ANSI Standard N18.7-1976 a part of our QA program commitments. H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 proposes deleting the commitment for biennial review of plant procedures. Maintaining plant procedures current to preclude the use of outdated or inappropriate procedures is a continual process. The need for procedure changes may be identified at various times for different reasons. Changes are evaluated for revision and implementation at the time of identification. We have developed programs which enhance the procedure revision process, providing assurance that procedures are appropriate for the circumstance and remain current. These programmatic controls actually exceed the intent of the biennial review process from both a technical and a practical standpoint because they constitute dynamic, rather than static, procedure review methodology. Thus, the biennial review process is redundant to the established programmatic controls and is no longer considered necessary. These programmatic controls are described below.

1. The document change process provides review assessment criteria that is applied to the procedure change process. These criteria address a number of categories, including design verification, technical adequacy, nuclear safety, system/component engineering, operations, human factors, and maintenance reviews. This program is in place to provide a mechanism for end users to identify, document, and initiate processing of procedure improvements as revisions to the affected procedure(s).
2. The Nuclear Plant Modification process requires that procedures be reviewed to determine the effects of a planned plant modification. Guidance is provided for the development of acceptance tests, requiring that tests be thoroughly reviewed

for the effects on nuclear safety, and be approved by authorized personnel. Prior to acceptance of a completed modification for service, the plant operating organization verifies that the required plant procedures and drawings have been appropriately updated.

3. The Corrective Action Program requires that an evaluation be performed for identified adverse conditions. The evaluation for adverse conditions includes the identification of procedural technical inadequacy. Root cause analysis is accomplished and corrective actions are taken for significant adverse conditions. Corrective actions may include recommended procedural enhancements, and require procedure revision to preclude recurrence. In addition, the Corrective Action Program has in place a methodology for trending the procedure preparation and revision process.
4. Administrative Procedures, the Operations Management Manual and the Maintenance Management Manual contain procedures for procedure preparation. These procedures include criteria for reviewing procedures for technical accuracy and correctness.
5. The Operating Experience (OE) program ensures that operating information pertinent to the plant is supplied to various organizations as necessary for action. This process, which meets the guidance of NUREG-0737, "Clarification of TMI Action Plan Requirements," Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff," includes NRC Information Notices; 10 CFR 21 reports; Significant Adverse Condition Reports; items initiated by other industry sources, such as Institute of Nuclear Power Operations (INPO) Significant Operating Experience Reports, Significant Event Reports, Significant by Others Reports, Significant Event Notifications, and Operation and Maintenance Reminders. This program includes provisions for ensuring appropriate corrective action is taken when an inadequacy is identified. This operating information can have an impact on procedures and, if significant, can result in a procedure revisions to enable closure of the applicable reviewed report.
6. The Operating License amendment process requires that an interfacing document review be conducted and that procedures affected by the proposed Operating License amendment be identified and revised to be consistent with the amendment request.
7. The Commitment Tracking Program provides measures for ensuring that procedures which implement commitments made to regulatory agencies, including the NRC and INPO, are maintained current. In addition, administrative controls are in place to preclude the inadvertent negation of a commitment through the procedure revision process.
8. The Technical Manual/Vendor Recommendation Review program provides specific recommendations for actions to be taken for reviewing a technical manual or vendor recommendation for applicability. Included in the review process are

specific instructions for the reviewer to consider the impact of the manual/recommendation on operating and maintenance procedures, surveillance tests, and calibration procedures. Actions resulting from these reviews are tracked until they are dispositioned as appropriate.

9. Management directives concerning procedure usage assign responsibility for procedure compliance and attention to detail in the performance of operational evolutions. Engineering processes include technical staff witness and assistance, as necessary, in conducting surveillance tests to ensure that tests as written work well in the field. Additionally, self-assessment is utilized as the primary means to ensure that the responsibility to maintain procedures current is properly retained by the line organizations that use the procedures.
10. Technical Specifications Section 6.5.1.6.6 requires that the Plant Nuclear Safety Committee perform an overview of procedures, tests, and experiments to assure that processes are effectively maintained. This is accomplished through administrative controls that provide capability for the responsible manager to bring a procedure change to the Committee's attention from a nuclear safety standpoint.
11. The Licensed Operator initial training and requalification program has formal processes in place to identify potential deficiencies in the emergency and abnormal operating procedures and to resolve them. This includes procedure revisions, if appropriate. In addition, use of the simulator is available as an option to validate the operations procedures.
12. The Emergency Plan Drills and Exercises also have formal processes in place to identify potential deficiencies in procedures used to respond to an emergency, and to resolve them. These procedures are used during periodic NRC required emergency drills and exercises. These formal processes also includes procedure revisions, if appropriate.
13. Infrequently used procedures that have a potential to cause a plant transient are reviewed prior to use to determine their adequacy. This proceduralized process introduces management awareness and involvement in these evolutions. If necessary, prior to procedure usage, appropriate management responsibility is assigned, training and procedure pre-job briefings are accomplished, and temporary assignments of additional personnel are made. Utilization of these controls determines if the current procedure is adequate or whether changes are necessary or desirable prior to procedure usage.
14. Line organizations that have responsibility for procedures or procedure categories will perform self-assessments, at least biennially, of the appropriate components that comprise the procedural development program in accordance with established guidelines. These self-assessments will provide a high degree of confidence that the programs and processes identified above are effective in maintaining procedures current.

15. A new process for tracking and trending the causes of procedure changes will be implemented upon approval of this proposed change to the QA program. This process will provide for the timely identification of the reasons for procedure changes and will aid in identifying any of the above described procedure change programs or process which may be ineffective. By tracking and trending the reason for procedure revisions, we will be able to periodically evaluate this information and take corrective actions as necessary. Therefore, this process provides an additional means of ensuring that the above described programs and processes are effective in maintaining procedures current.
16. The Nuclear Assessment organization assesses the programs and processes identified above as part of the their assessment function. These evaluations are performance based to ensure resources are properly allocated to obtain desired results. These assessments enable the Nuclear Assessment organization to focus on significant issues which may impact safety and reliability.

Based on implementation of the above programs, the provision contained in ANSI Standard N18.7 - 1976, "Administrative Controls and Quality Assurance Requirements for the Operational Phase of Nuclear Power Plants," to provide a systematic review of procedures will continue to be met without requiring an additional biennial procedure review.

Effect of Change on HBRSEP UFSAR Chapter 1.8, Conformance to NRC Regulatory Guides

This change takes exception to a commitment previously accepted by the NRC, and changes the description of the Quality Assurance Program. Since the proposed change eliminates the biennial review of plant procedures it represents a reduction in commitment.

The basis for concluding that this change continues to satisfy the criteria of 10 CFR 50, Appendix B, conformance to NRC Regulatory Guides previously committed to in the Safety Analysis Report, and the Quality Assurance program previously accepted by the NRC.

The requirements of 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," and Criterion VI, "Document Control," continue to be satisfied as stated in UFSAR Section 17.2. The proposed change provides an alternative method for ensuring that procedures remain current and appropriate for the circumstances.