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SUBJECT: Forwards proposed alternative to requirement to perform biennial reviews of plant procedures in accordance w/ANSI Std N18.7-1976,Administrative Controls & QA Requirements for Operational Phase of Nuclear Power Plants.

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Carolina Power & Light Company

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JUL 28 1993

Serial: RNP/93-1772

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

REQUEST FOR CHANGE IN QUALITY ASSURANCE PROGRAM

Gentlemen:

The purpose of this letter is to submit, pursuant to 10 CFR 50.54(a)(3), a proposed alternative to the H. B. Robinson Unit 2 requirement to perform biennial reviews of plant procedures in accordance with ANSI Standard N18.7-1976, Administrative Controls and Quality Assurance Requirements for the Operational Phase of Nuclear Power Plants. In place of this review, Carolina Power & Light Company (CP&L) has existing programmatic controls that continually identify changes to and update procedures at H. B. Robinson Unit No. 2. This change, as indicated in the attached 10 CFR 50.54(a) review, has been identified as a reduction to the commitments contained in UFSAR Chapter 1.8, Conformance to NRC Regulatory Guides, and Chapter 17.2, Quality Assurance (QA) During the Operating Phase. Although this change has been identified as a reduction in commitment, the Quality Assurance Program continues to satisfy the criteria of 10 CFR 50, Appendix B. CP&L believes that the proposed review process is equally or more effective than that provided in ANSI N18.7-1976. However, since this change constitutes a revision to CP&L's commitments to ANSI N18.7, the NRC's review of the proposed change is requested. In accordance with 10 CFR 50.54(a)(3)(iv), CP&L will begin implementation of the proposed change upon approval of the NRC staff or within sixty (60) days from the date of this letter.

Questions concerning this submittal may be referred to Mr. D. B. Waters at (803) 383-1802.

Very truly yours,

Charles R. Dietz
Vice President
Robinson Nuclear Plant

RDC:RES:1st

030081

Attachments

cc: Mr. S. D. Ebneter
Mr. B. L. Mozafari
Mr. W. T. Orders

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BIENNIAL PROCEDURE REVIEW PROCESS REVISION

Attachment 1	Proposed exception to ANSI N18.7-1976, commitments as stated in the UFSAR, Section 1.8
Attachment 2	10 CFR 50.54 review

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, Revision 2, February 1978, and the requirements and recommendations for administrative controls described in ANSI N18.7-1976, except as stated below:

a) Section 4.5 titled Audit Program: The next to last paragraph states, "Periodic review of the audit program shall be performed by the independent review body or by a management representative at least semiannually to assure that audits are being accomplished in accordance with requirements of Technical Specifications and of this Standard." CP&L's QA Auditing Unit is an independent section that monitors all other sections within our organization. Each audit report is reviewed by the Executive Vice President - Power Supply. CP&L feels that these management reviews stated satisfy the requirements of the above paragraph.

b) Section 5.2.1.6 titled Measuring and Test Equipment: See UFSAR Section 17.2.12 for clarification.

c) The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978, shall be established, implemented, and maintained as specified in the HBR 2 Technical Specifications.

d) Section 5.2.17 titled Inspections: The second to the last sentence in the last paragraph, "Deviations, their cause, and any . . . ," to be consistent with paragraph 5.2.11 and 10 CFR 50, Appendix B, the cause of the deviation will be determined for only significant conditions adverse to safety.

e) Section 5.3.9.1 titled Emergency Procedure Format and Content: Emergency procedures shall be in the format as committed to in NUREG-0737, TMI Action Plan.

f) Section 5.2.2 titled Procedure Adherence: Temporary changes to approved procedures shall be approved by persons specified in the HBR 2 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 or desirable. A revision to a procedure constitutes a procedure review." In lieu of these requirements, H. B. Robinson Unit 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 REVIEW

PROPOSED REPLACEMENT OF BIENNIAL REVIEW
OF PLANT PROCEDURES WITH PROGRAMMATIC CONTROLS

UFSAR Sections 1.8 and 17.2.5: Description of Changes

UFSAR Section 1.8: Add an exception to the H. B. Robinson Unit 2 commitment to ANSI N18.7-1976, Section 5.2.15, as endorsed by NRC Regulatory Guide 1.33, Revision 2.

Reason for Change

H. B. Robinson Unit 2 proposes deleting the requirement 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. H. B. Robinson Unit 2 has developed many 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. The existing 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/I&C 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 methodology for trending 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 written correctness.

5. The Operating Experience Feedback (OEF) Review Program ensures that operating information pertinent to the plant is supplied to various organizations as necessary for action. This process, which meets the requirements of NUREG-0737, Item I.C.5, includes NRC Notices, 10 CFR 21 reports, Significant Adverse Condition Reports, items initiated by other industry sources, such as NUMARC and AEOD, and INPO Significant Operating Experience Reports, Significant Event Reports, Significant by Others, Significant Event Notifications, and Operation and Maintenance reminders. This program includes provisions for ensuring appropriate corrective action is taken when an inadequacy is identified. These evaluations can have an impact on procedures and require procedure revisions to enable closure of the applicable report reviewed.

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. The necessary procedure revisions are tracked by the commitment tracking process discussed below.

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 well as written work 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 Specification 6.5.1.6.6 requires that the Plant Nuclear Safety Committee (PNSC) 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 adverse operating procedures and to resolve them. This includes procedure revisions, if appropriate. In addition, use of a procedure on the simulator is available as an option to validate operational procedures.

12. The Emergency Drills and Exercises also have formal processes in place to identify potential deficiencies in procedures used to respond to an emergency, during periodic NRC required emergency drills and exercises, and to resolve them. This 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 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. The Nuclear Assessment Department (NAD) assesses the programs and processes identified above as part of the NAD assessment function. These NAD evaluations are performance-based to ensure resources are properly allocated to obtain desired results. These assessments enable the NAD to focus on significant issues which may impact safety and reliability.

Based on implementation of the above programs, the requirement contained in ANSI N18.7 - 1976 to provide a systematic review of procedures will continue to be met without requiring an additional biennial procedure review.

Effect of Change on H. B. Robinson 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, Criteria 5 and 6 continue to be satisfied as stated in UFSAR 17.2. The proposed change provides an alternative method for ensuring that procedures remain current and appropriate for the circumstances.