

January 30, 1996

Mr. B. Ralph Sylvia
Executive Vice President - Nuclear
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
P.O. Box 63
Lycoming, NY 13093

SUBJECT: 10 CFR 50.54 QUALITY ASSURANCE PROGRAM CHANGE REVIEW

- References:
- (1) Letter dated November 6, 1995, from R. Sylvia, Niagara Mohawk to U.S. Nuclear Regulatory Commission transmitting a Request for Approval of a Quality Assurance Topical Report Change
 - (2) Administrative Letter dated February 23, 1995 from U. S. Nuclear Regulatory Commission to all holders of operating licenses or construction permits for nuclear power reactors regarding Cost Beneficial Licensing Actions

Dear Mr. Sylvia:

This letter is in regard to your 10 CFR 50.54 submittal requesting a change to the Quality Assurance Topical Report (QATR) for the Nine Mile Point Units 1 and 2.

The proposed change is a reduction in a commitment to ANS 3.2-1982, concerning the frequency of procedure reviews. The change was submitted as a cost beneficial licensing action. However, as stated in Attachment 1 from Administrative Letter 95-02, changes to the Quality Assurance Plan under 10 CFR 50.54(a) are not considered cost beneficial licensing actions.

The Region I staff has reviewed this submittal, in accordance with 10 CFR 50.54(a), and has approved your request for exception to the biennial review of plant procedures with the following change. In your letter, dated November 6, 1995 you stated that QATR Section B.5.2, "Instructions, Procedures, and Drawings" will be revised. In subsequent phone conversations between the NRC and Niagara Mohawk representatives, it was agreed that the following paragraph will be added to QATR Section B.5.2.

All applicable plant procedures are reviewed/revise as required by programmatic control stimuli such as: licensee commitments, industry events, venter technical input, deviation/event reporting, user feedback, plant modifications, station events or training experiences, and Quality Assurance input. The adequacy of the procedure review, approval and control process for procedures that are used within a 24-month interval* will be reviewed during QA audits at least every two years as required by 10 CFR 50 Appendix B. Administrative procedures, and procedures used during every fuel cycle, are included in this population.

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- * A 24-month interval is defined as 24-months with a maximum allowable extension of 25% consistent with the Technical Specification provision for extension of surveillance requirements.

The Region I staff expectation is that the acceptability of the selected procedures will be ensured during the conduct of such QA audits and that root cause of significant procedural deficiencies will be determined and corrected.

The effectiveness of your Quality Assurance Program and procedure implementation will continue to be the subject of routine regional inspections.

Sincerely,

ORIGINAL SIGNED BY:

Glenn Meyer, Chief
Operator Licensing - Human
Performance Branch
Division of Reactor Safety

Docket Nos. 50-220
50-410

cc:

R. Abbott, Vice President-Nuclear Generation
C. Terry, Vice President-Nuclear Engineering
M. McCormick, Vice President - Safety Assessment and Support
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 concurred
 via e-mail
 on 1/23/96
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