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*See Proposed Change To Tech Specs*

SUBJECT: Application for amends to licenses DPR-80 & DPR-82, revising TS 6.1, "Responsibility" & relocating TS 6.5, "Review & Audit" & sections 6.8.lc, 6.8.ld, 6.8.2 & 6.8.3 of TS 6.8, "Procedures & Programs."

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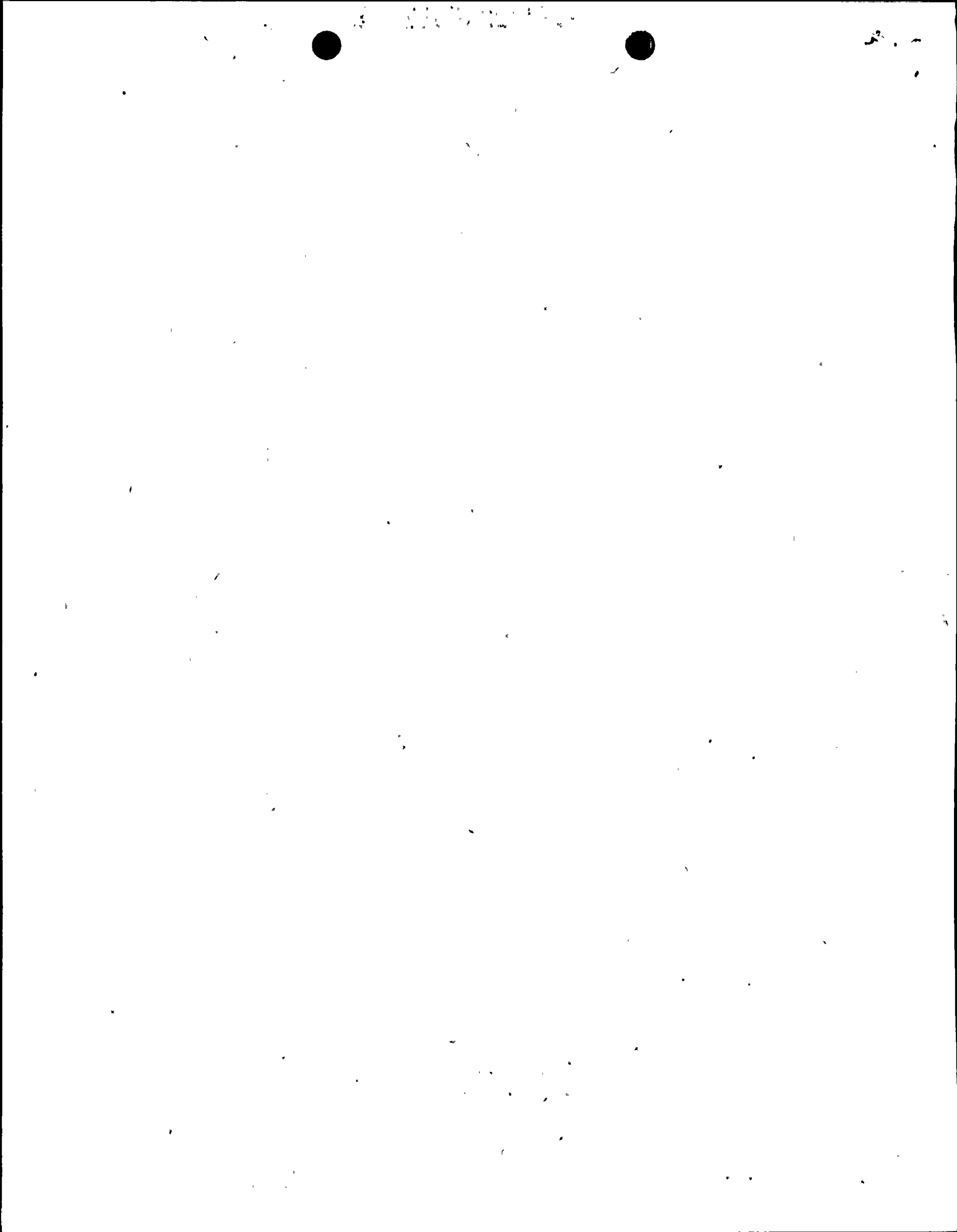
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Pacific Gas and Electric Company

Diablo Canyon Power Plant  
P.O. Box 56  
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Robert P. Powers  
Vice President—Diablo Canyon  
Operations and Plant Manager

August 8, 1996

PG&E Letter DCL-96-176



U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Submittal of Supplemental Information for PG&E License Amendment Request  
95-08

Dear Commissioners and Staff:

PG&E letter DCL-95-276, dated December 19, 1995, submitted License Amendment Request (LAR) 95-08. LAR 95-08 proposed a revision to the Diablo Canyon Power Plant (DCPP) Technical Specifications (TS) to revise TS 6.1, "Responsibility;" and to relocate TS 6.5, "Review and Audit;" and sections 6.8.1c, 6.8.1d, 6.8.2, and 6.8.3 of TS 6.8, "Procedures and Programs;" in accordance with guidance in an NRC letter from William T. Russell to the chairpersons of the industry owners groups, dated October 25, 1993, and the Commission's Final Policy Statement for relocation of TS. Associated proposed changes to the DCPP Quality Assurance Program and Final Safety Analysis Report were also provided with the LAR.

During review of LAR 95-08 the NRC staff identified comments and questions regarding the submittal. The attachments to this letter provide revised Attachments D, E, F, and G for LAR 95-08 that address these comments and questions, and correct a pagination problem inadvertently introduced during original LAR distribution. These attachments are direct substitutes for the original attachments provided in the LAR.

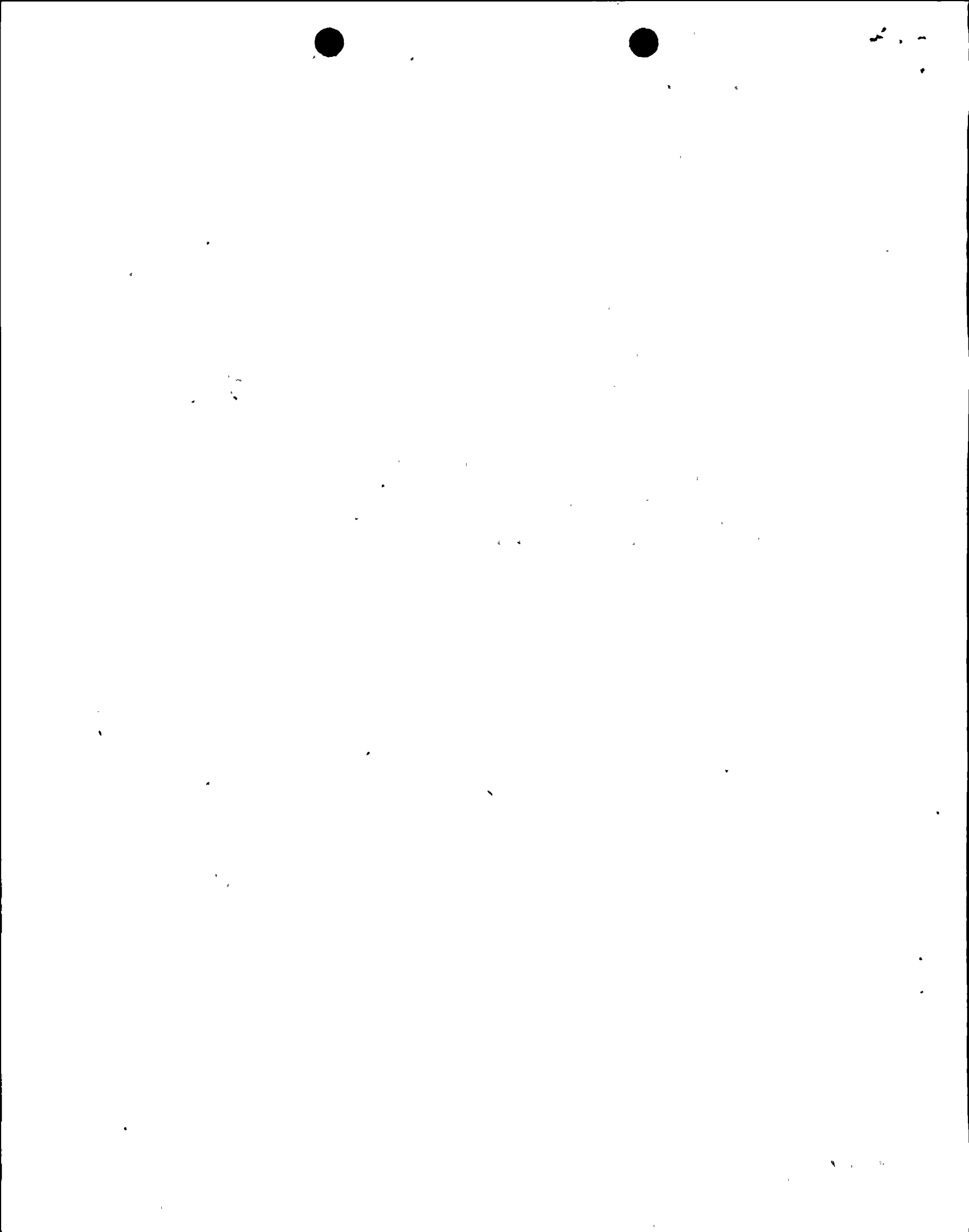
The enclosed information does not affect the conclusions of the safety evaluation or the no significant hazards consideration determination performed for LAR 95-08.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert P. Powers'. The signature is written in a cursive, flowing style.  
Robert P. Powers

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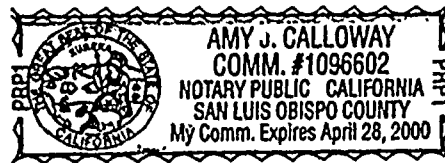
Subscribed and sworn to before me  
this 8th day of August, 1996.  
County of San Luis Obispo  
State of California

Attorneys for Pacific Gas and  
Electric Company  
Christopher J. Warner  
Richard F. Locke

Amy J. Calloway  
Notary

Richard F. Locke  
Richard F. Locke

cc: Edgar Bailey, DHS  
Steven D. Bloom  
L. J. Callan  
Kenneth E. Perkins  
Michael D. Tschiltz  
Diablo Distribution



Attachments .

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## PROPOSED REVISION TO FSAR CHAPTER 17

As part of the proposed Technical Specification (TS) relocation included in License Amendment Request (LAR) 95-08 contained in Attachments A through C of this submittal, the requirements of the relocated TS would be relocated to Chapter 17 of the Diablo Canyon Power Plant (DCPP) Final Safety Analysis Report (FSAR) Update. At the time of the relocation of the TS to the FSAR Update, some requirements will be revised. The proposed revisions to the relocated TS may impact the effectiveness of the Quality Assurance (QA) Program. Consequently, the proposed revisions are being submitted for review and approval in accordance with 10 CFR 50.54(a)(3). The specific revisions proposed are as follows:

### A. FSAR UPDATE SECTION 17.2.

FSAR Update Section 17.2 will be revised to incorporate the requirements of relocated TS 6.5.2. TS 6.5.2.1 through 6.5.2.5, TS 6.5.2.7, and 6.5.2.8 would be relocated verbatim to the FSAR Update. As part of the relocation of TS 6.5.2.6, the responsibilities of the Plant Staff Review Committee (PSRC) will be revised. The responsibilities will be revised to replace PSRC review of proposed changes to procedures and programs with reviews by qualified individuals. All proposed changes are required to be evaluated to determine if a 10 CFR 50.59 evaluation is required to make the change. If a 10 CFR 50.59 evaluation is required, it will be reviewed by the PSRC. Reviewers would also be required to determine whether additional cross-disciplinary reviews are necessary. If necessary, the cross-discipline reviews will be performed by appropriate qualified reviewers.

The requirements that define the new program and procedure review function, that will take the place of reviews presently performed by the PSRC, are proposed to be located in FSAR Update Section 17.5 as discussed later in this attachment. Additionally, FSAR Update Section 17.3 will be revised to define a new review and approval function for proposed changes or modifications to plant systems or equipment that affect nuclear safety.

This proposal is consistent with NUREG-1431, Revision 0 (this requirement, as well as most of the administrative requirements of TS Section 6, was removed in Revision 1 of NUREG-1431), which recognizes that there are several ways of performing effective reviews. Reviews may





be performed by qualified individuals, rather than by committees, as long as the reviews include a determination as to whether additional cross-disciplinary reviews are necessary. These determinations would be required by additions to FSAR Update Sections 17.3 and 17.5. Since effective reviews will continue to be performed, nuclear safety will not be affected.

The PSRC would also improve its effectiveness in performing its safety review function. Since the PSRC will no longer have to review routine procedure changes that do not significantly affect nuclear safety, it can focus on issues that potentially have more safety significance.

These changes are being made so that the required reviews are performed by qualified individuals capable of assessing the impact of the changes on plant operation more efficiently than the PSRC.

This change is consistent with NUREG-1431, Rev. 0. It is also consistent with the TS for McGuire Units 1 and 2.

FSAR Update Section 17.2 would also be revised to incorporate the requirements of relocated TS 6.5.3.1 through 6.5.3.7, 6.5.3.9, and 6.5.4. These TS would be relocated verbatim to the FSAR Update.

**B. FSAR UPDATE SECTION 17.3**

FSAR Update Section 17.3 would be revised to define how modifications to plant equipment are reviewed and approved. It will require, when appropriate, independent reviews, cross-disciplinary reviews, safety evaluations and approval by the plant manager or his designee.

**C. FSAR UPDATE SECTION 17.5**

FSAR Update Section 17.5 would be revised to add several new subsections. These subsections would contain the requirements currently contained in TS 6.5.1, "Technical Review and Control," and TS 6.8.2 and 6.8.3, "Procedures and Programs."

TS 6.5.1.1

FSAR Update Section 17.5 would be revised to clarify that the procedure and program review requirements, currently located in TS 6.5.1.1, are applicable when creating or revising plant programs and procedures. The requirements in FSAR Update Section 17.5 will also apply when creating



or revising corporate procedures and procedures used by support organizations if they can have an immediate effect on plant operations, or the operational status of safety-related structures, systems, or components. They do not apply to editorial or typographical changes.

This proposed change to TS 6.5.1.1, as it is relocated to FSAR Update Section 17.5, is a clarification. TS 6.5.1.1 was intended to apply to activities under the control of the plant manager and were not intended to apply to all licensee activities, such as those performed in the corporate headquarters by support organizations, unless those activities directly affected plant operations. Consequently, review and approval requirements being added to FSAR Update Section 17.5 should only apply to programs and procedures that are under the plant manager's control, affect plant operations, or affect the operational status of safety-related structures, systems, or components. Since there are no changes to existing requirements or practices, nuclear safety is not affected. The exclusion of editorial and typographical changes is appropriate since these changes to programs or procedures cannot affect nuclear safety.

Present wording has caused confusion, since it does not specifically say which procedures should be controlled in accordance with the TS. For example, it could be interpreted to require all corporate procedures to be reviewed by the PSRC.

Exclusion of editorial and typographical changes from the normal review process is consistent with the TS for Byron Units 1 and 2, and Joseph M. Farley Units 1 and 2.

#### TS 6.5.1.2

At the time of relocation, TS 6.5.1.2 would be revised to remove the requirement for previous designation of reviewers by the plant manager by discipline or procedure category. Reviewers qualified to perform program or procedure reviews will be designated by the plant manager or his designee. However, they will not be designated by discipline or procedure category.

A requirement is also being added to ensure that reviews are performed by qualified personnel with appropriate technical backgrounds. A responsible organization shall be assigned for each procedure. This organization shall ensure that reviews are performed by qualified personnel of the appropriate disciplines.



The requirement to previously designate reviewers by discipline or procedure category does not improve the quality of reviews or nuclear safety. In practice, the approval authority of a program or procedure does not rely on prior designations. Instead, the approval authority will assure that the proposed change has been reviewed by individuals that are knowledgeable of the related subject and capable of performing the required review.

The reviewer designation system could have a negative affect on the quality of reviews. If the most knowledgeable and qualified individual to perform an urgently needed review is not designated for reviews in the correct procedure category, the review would have to be performed by someone else.

Obtaining and maintaining designations by discipline or procedure category has proven to be a significant administrative burden and has added complexity and unnecessary delays to the procedure review process. During initial implementation, the types of activities covered by procedures and programs were reviewed and it was determined that at least 24 categories were necessary to meet the intent of the TS requirement. Each procedure was then labeled with the appropriate category and reviewers were designated for categories they expected to review. However, some procedures included requirements that were specific to more than one discipline, so it was not clear which category should be assigned. It was also unclear as to which of the 24 designations a reviewer should have. Furthermore, as individuals moved from one staff position to another, the procedures they expected to review changed. Consequently, reviews have often been delayed when the right reviewer, with the right background, education, and experience has been designated, but not in the right category. Updating designations has also proven to be a constant necessity and a significant administrative burden.

It was also determined that this designation system indirectly contributes to a lack of adherence to procedures. Unnecessary delays make revising procedures more difficult. This discourages individuals who identify procedure discrepancies from initiating revisions.

This proposal is consistent with the TS for McGuire Units 1 and 2, Byron Units 1 and 2, and Joseph M. Farley Units 1 and 2.



TS 6.8.2

FSAR Update Section 17.5 would be revised to contain relocated TS 6.8.2. At the time of the relocation, the requirements of TS 6.8.2. would be revised to require that the procedures identified in TS 6.8.1 be approved by the plant manager or his designee, in accordance with approved administrative procedures, prior to implementation. Additionally, the requirements that administrative procedures; procedures implementing the Security Plan, Emergency Plan, and Process Control Program; the Offsite Dose Calculation Procedure; and Environmental Radiological Monitoring Procedure and changes thereto, be reviewed by the PSRC prior to implementation would be deleted. However, any 10 CFR 50.59 evaluations required to implement a change to these documents would be reviewed by the PSRC.

The change in approval authority is consistent with NUREG-1431, Rev. 0. Allowing a knowledgeable individual designated by the plant manager to approve procedures, rather than requiring them to be approved by the plant manager, is not expected to affect nuclear safety. Designated approvers would have an equivalent level of knowledge and experience to that of the plant manager. In fact, since the plant manager cannot be a technical expert in all areas, individuals below the level of plant manager may be more knowledgeable of a subject area for a specific procedure.

The proposed revision will eliminate an unnecessary layer of review and simplify the procedure review process without impacting plant safety. The simplification of the procedure review and approval process will eliminate barriers that currently discourage the revision of procedures and contribute to a lack of procedure adherence.

The proposed revision is consistent with NUREG-1431, Rev. 0.

TS 6.8.3

FSAR Update Section 17.5 would be revised to contain relocated TS 6.8.3. At the time of the relocation, the requirements of TS 6.8.3 would be revised to remove the requirement for an individual with a Senior Reactor Operators license to approve some temporary procedure changes. The requirement would be revised to specify that a Senior Reactor Operator is only required to approve temporary procedure changes for the types of procedures listed below:





1. All operations section procedures
2. Surveillance test procedures
3. Emergency Plan implementing procedures
4. Any other procedure if the proposed change affects equipment or system operating status.

A sentence is also being added to ensure that the Shift Foreman of the affected unit is informed of changes when appropriate.

Other temporary procedure changes shall be approved by two management staff members who meet applicable qualification requirements of ANSI/ANS 3.1-1978.

This change does not affect nuclear safety, since it retains the requirement for temporary procedure changes to be approved by an individual with a Senior Reactor Operators license, when a review by someone with his knowledge and experience is needed. It also allows the approval to be performed by a more appropriate staff member when the knowledge and experience of an individual with a Senior Reactor Operators license is not needed. For example, a senior maintenance engineer may be a more appropriate person to approve a technical change to a complex maintenance procedure. In addition, this change may improve nuclear safety, since individuals on shift with Senior Reactor Operators licenses will be distracted less frequently by requests to approve temporary procedure changes.

This change will streamline the temporary procedure change process so plant personnel can correct procedure discrepancies more easily. This is expected to improve adherence to procedures, since incorrect procedures will be easier to correct.

- This change proposes requirements for approval of temporary procedure changes by a Senior Reactor Operator that are similar to requirements in the Wolf Creek Unit 1 TS.

D. FSAR UPDATE SECTION 17.18

FSAR Update Section 17.18 would be revised to incorporate requirements of TS 6.5.3.8. As part of the relocation of TS 6.5.3.8, the audit frequencies specified in TS 6.5.3.8 would be revised. Attachment E of this submittal describes the proposed changes and provides the justification for and assessment of these changes on the effectiveness of the DCPP QA Program.



## PROPOSED REVISION TO FSAR UPDATE SECTION 17.18

### A. DESCRIPTION OF CHANGES

The Quality Assurance (QA) Program as described in Section 17.18 of the Final Safety Analysis Report (FSAR) Update would be revised to include the following:

Audits are performed either biennially or annually. They are regularly scheduled on a formal audit schedule prepared by the Manager, Nuclear Quality Services (NQS). The audit schedule is reviewed regularly by the NQS Manager and the Nuclear Safety Oversight Committee (NSOC), and revised as necessary to assure adequate coverage as commensurate with activities and past performance. Audits are performed by trained personnel not having direct responsibilities in the area being audited and in accordance with approved audit plans. Additional audits may be performed as requested by NSOC, the Nuclear Power Generation (NPG) Senior Vice President & General Manager or the Manager of NQS.

The following areas shall be audited at least once per 24 months:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable licenses.
- b. The performance, training, and qualifications of the entire plant staff.
- c. The results of actions taken to correct deficiencies occurring in plant equipment, structures, systems, or method of operation that affect nuclear safety.
- d. The performance of activities required by the QA Program to meet the criteria of Appendix B, 10 CFR 50.
- e. The Fire Protection and Loss Prevention Program, in accordance with the annual (1 year) and biennial (2 year) audit and inspection requirements of NRC Generic Letter (GL) 82-21.
- f. The Fire Protection and Loss Prevention Program, in accordance with the annual and triennial (3 year) audit requirements of NRC GL



82-21. This audit is usually performed in alternate years from item e. above.

- g. The Radiological Environmental Monitoring Program, its implementing procedures, and program results.
- h. The Offsite Dose Calculation Procedure and its implementing procedures.
- i. The Process Control Program and implementing procedures for processing and packaging radioactive wastes.
- j. The Nonradiological Environmental Monitoring Program.

The following activities shall be audited at least once per 12 months unless specified otherwise. However, if the audit frequencies required by the governing regulations are changed, audit frequencies shall at least meet the revised minimum requirements.

- k. The performance of activities required by the QA Program for effluent monitoring.
- l. The Security Program in accordance with 10 CFR 73.55(g)(4) and 10 CFR 73.56(g).
- m. The Access Authorization Program in accordance with 10 CFR 73.56(g)(1) - at least once per 24 months. If a contractor's or vendor's Access Authorization Program is accepted, that contractor's or vendor's Access Authorization Program shall be audited in accordance with 10 CFR 73.56(g)(2) - at least once every 12 months.
- n. The Emergency Response Program in accordance with 10 CFR 50.54(t).
- o. The Fitness for Duty Program in accordance with 10 CFR 26.80.
- p. The Radiation Protection Program in accordance with 10 CFR 20.
- q. Any other area of operation considered appropriate by NSOC; the NPG Senior Vice President and General Manager, or the NQS



Manger, at a frequency determined by NSOC or the requesting individual.

The changes are noted in the marked-up FSAR Update pages and the proposed FSAR Update pages (Attachments F and G).

## B. BACKGROUND

Attachments A, B, and C of this letter propose to relocate the requirements of Technical Specification (TS) 6.5.3.8, "Audits," to the QA Program described in Chapter 17 of the Diablo Canyon Power Plant (DCPP) FSAR Update.

NUREG-1431, Rev. 0 states that reviews and audits should be integrated into a concise program that provides senior management with an assessment of facility operation and recommends actions to improve nuclear safety and plant reliability. Those audits specified are meant to address programs and systems which are essential to the effective management of a nuclear facility. Most audits are required to be performed biennially, but some are required by the TS to be performed more frequently. Most audit frequencies were established in the 1970s and many administrative control programs have improved significantly since the frequencies were established. Experience has shown that, in many cases, these elevated frequencies are no longer necessary. Consequently, the overall effectiveness of the audit program can be improved by changing some audits to a biennial frequency and re-assigning audit resources to weak areas.

The audit requirements that would be relocated to Chapter 17 of the FSAR Update, specified in Section A above, and their associated minimum frequencies, have been developed from various sources, such as the Code of Federal Regulations, NUREG-1431, Rev. 0, NRC GLs, and industry guidelines and standards.

## C. EVALUATION OF CHANGES

The proposed changes would allow for decreasing the frequency of some audits to biennial. The exceptions to this frequency extension would be those audits which have frequencies specified by the Code of Federal Regulations, the Emergency Plan, the Physical Security Plan, and the Fitness For Duty Program.





This change does not alter the function or quality of DCP's audit program. NSOC retains responsibility for oversight of the QA Program. The NQS Manager retains the responsibility to report to NSOC on the effectiveness of the QA Program. The administrative procedure that controls NSOC activities will be revised to reflect these changes.

An evaluation of each of the proposed changes is provided below:

1. The conformance of facility operation to provisions contained within the TS and applicable license conditions.

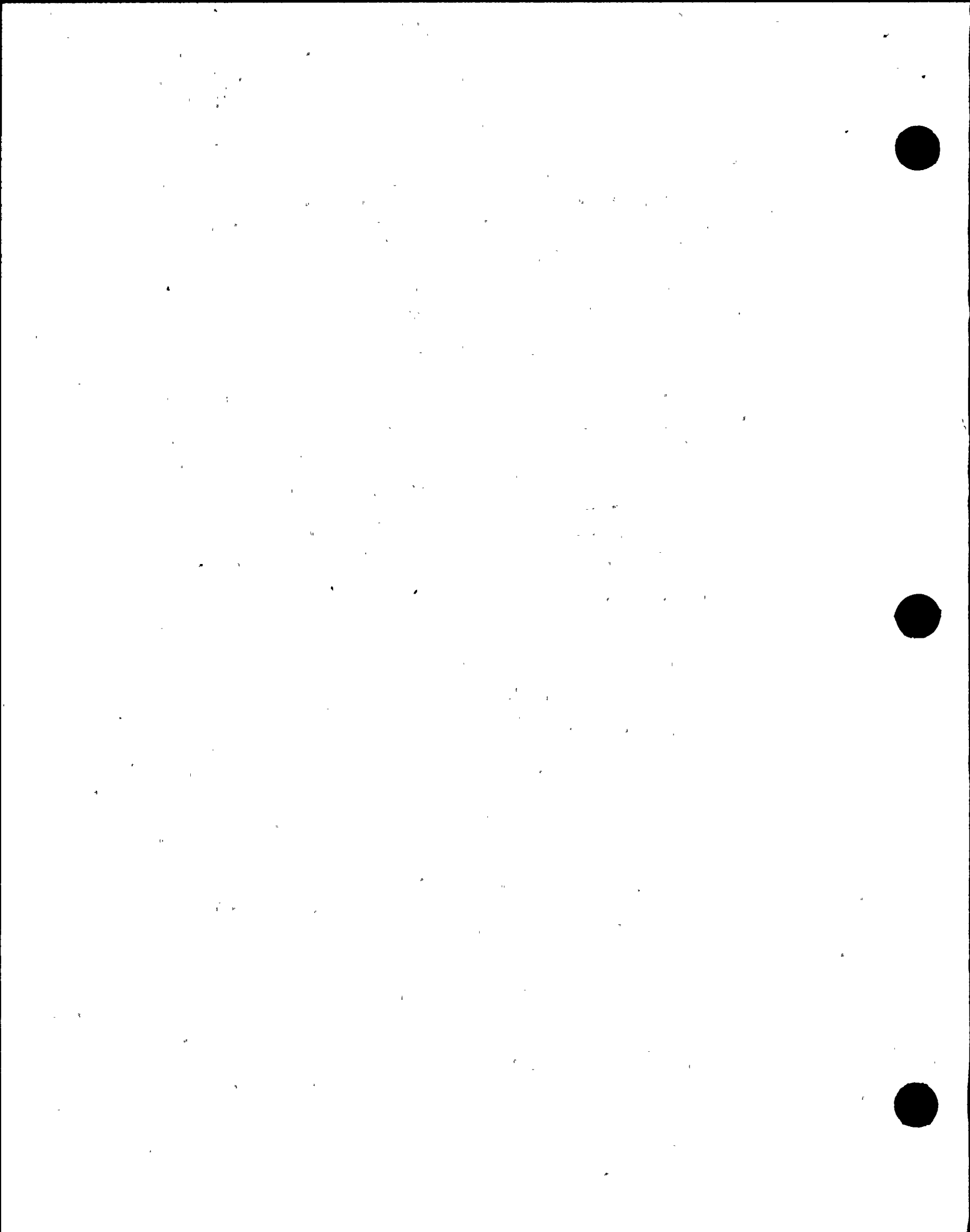
Applicable portions of the TS and license conditions are assessed during each audit for the particular area(s) being audited, and an annual audit is conducted to evaluate those areas which are not evaluated in other audits. Additionally, compliance with the TS and license conditions is monitored on an on-going basis by NPG management and various oversight groups. Results of audits during the last several years indicate that reducing the frequency of the annual audit to biennial will not adversely impact compliance with those provisions of the TS. No significant problems were identified during the audits.

A statement will be added to FSAR Update Section 17.18 to clarify PG&E's commitment to Regulatory Guide (RG) 1.33. Specifically, the requirement to perform an audit of the conformance of the facility to provisions of the TS every 12 months is being changed to a biennial frequency as stated in Sections 17.18 and table 17.2 of the FSAR Update.

2. The performance, training, and qualifications of the entire facility staff.

Audits of the facility staff's performance, training and qualifications are currently conducted annually. The proposed changes will extend this frequency to once every 24 months. Results of audits over the last several years indicate that this extension will not adversely impact the effectiveness of the Nuclear Training Program. No significant problems have been identified.

Additionally, NPG's training program is accredited by the Institute of Nuclear Power Operations (INPO). Maintaining this accreditation requires an extensive periodic effectiveness assessment to be



performed independently by INPO. This assessment and biennial audits should be adequate to ensure that the training program will remain effective.

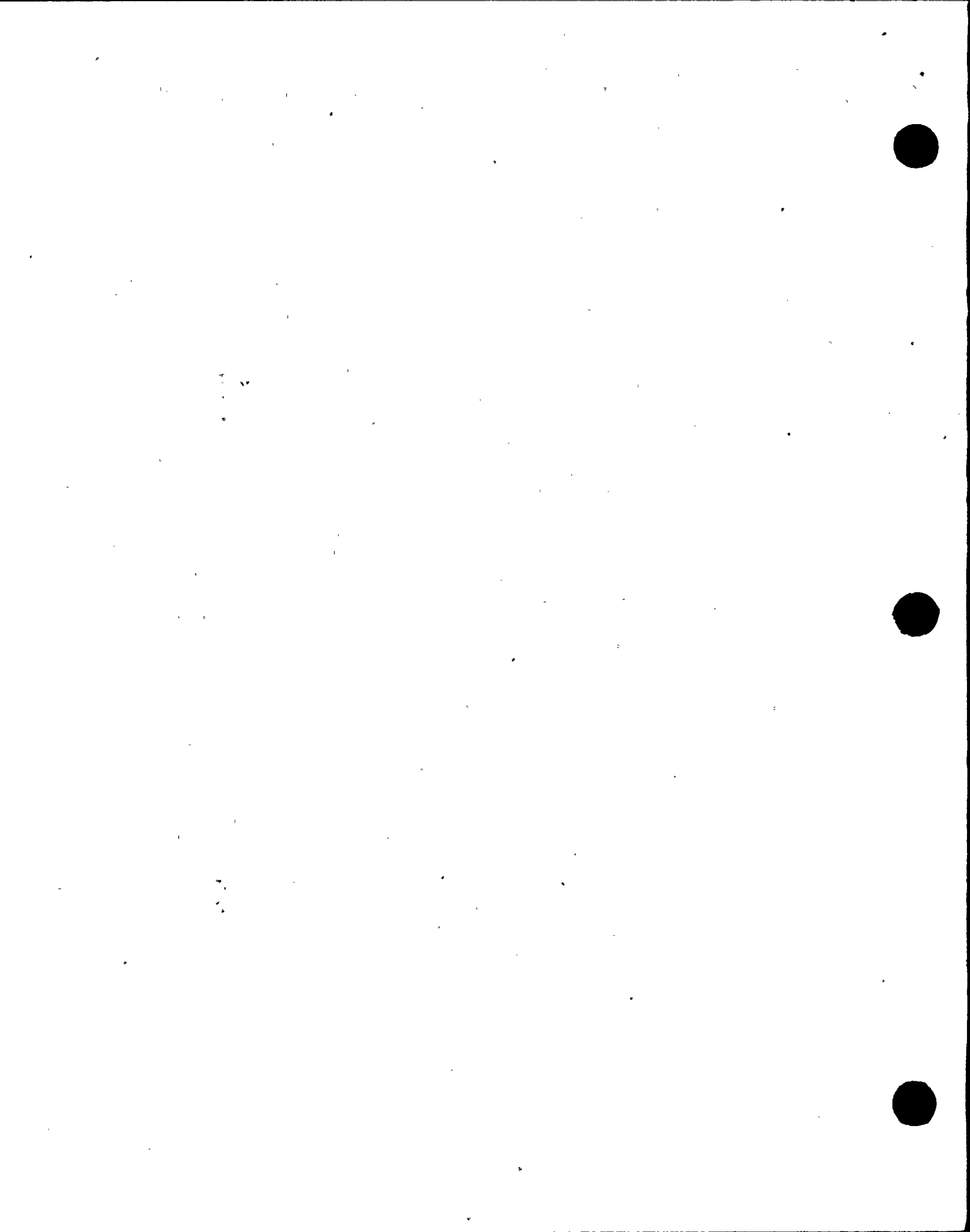
A statement will be added to FSAR Section 17.18 to clarify PG&E's commitment to RG 1.33. Specifically, the requirement to perform a training audit every 12 months is being changed to a biennial frequency as stated in Section 17.18 and Table 17.2 of the FSAR Update.

3. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems, or method of operation that affect nuclear safety.

The results of actions taken to correct identified deficiencies are evaluated as part of each audit for the specific area being audited; currently, an audit is performed every six months to evaluate the programmatic controls which govern the corrective action process. The proposed changes would allow these corrective action program audits to be performed every 24 months. The results of actions taken to correct identified deficiencies would still be evaluated routinely as part of audits of other areas.

Results of audits over the last several years indicate that this extension will not adversely impact the effectiveness of the corrective action program or of the audit program. Few deficiencies have been identified and none were significant. Furthermore, the effectiveness of the corrective action program is monitored on an on-going basis through trend evaluations and through monitoring of performance indicators. As such, the proposed changes will not diminish the effectiveness of either the corrective action program or the oversight of that program.

A statement will be added to FSAR Section 17.18 to clarify PG&E's commitment to RG 1.33. Specifically, the requirement to perform a corrective action audit every six months is being changed to a biennial frequency as stated in Section 17.18 and table 17.2 of the FSAR Update.



4. The Fire Protection Program and implementing procedures.

Audits of the Fire Protection and Loss Prevention Program are currently conducted annually, biennially, and triennially.

The proposed changes affect the independent fire protection and loss prevention audit by utilizing either qualified offsite licensee personnel or an outside fire protection firm (annual audit), and an audit of the Fire Protection and Loss Prevention Program by an outside qualified fire consultant (triennial audit). The changes will combine the annual and triennial audits into one biennial audit, which will be alternated with the current annual and biennial Fire Protection Program audit. Hence, each year a fire protection audit will be performed, and a qualified outside consultant will be utilized in alternate years.

This will not adversely impact the effectiveness of either the Fire Protection/Loss Prevention Program or the Audit Program. The proposed alternate Audit Program continues to evaluate the areas addressed in NRC GL 82-21, utilizes the same recommended resources, and is comprehensive in its review of fire protection and loss prevention features.

5. The Radiological Environmental Monitoring Program.

This audit is currently performed once every 12 months. The proposed changes would allow the audit to be performed every 24 months. Results of audits over the last several years indicate that this extension will not adversely impact the effectiveness of the Radiological Environmental Monitoring Program or of the Audit Program. No significant problems have been identified.

The purpose, scope, and thoroughness of QA audits will not be affected; management oversight of the audit process will not be diminished; and the audits will be performed at frequencies commensurate with safety significance and not less than biennially (as defined above). As such, these changes are appropriate and acceptable.

