PRIORITY 1
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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:9407210217 DOC.DATE: 94/07/14 NOTARIZED: NO DOCKET #
FACIL:50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylva 05000387
50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
AUTH.NAME AUTHOR AFFILIATION
BYRAM,R.G. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Requests approval of change to FSAR to revise biennial review of nuclear plant procedures.Proposed SSES FSAR Chapter 17.2 & justification for rev to biennial review requirements encl.

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	RGN1 FILE	1	1			
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PRIORITY 1 DOCUMENT

PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

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JUL 14 1994

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR FSAR/QUALITY ASSURANCE
CHANGE APPROVAL
PLA-4142 FILE R41-2

Docket Nos. 50-387
and 50-388

In accordance with 10CFR50.54 (a) (3), Pennsylvania Power & Light Company (PP&L) requests approval of a change to the Final Safety Analysis Report (FSAR) to revise the biennial review of nuclear plant procedures. Currently the FSAR commits to biennial reviews of certain plant technical procedures by reference to ANSI N18.7-1976, Section 5.2.15. This proposed change will provide for the review of plant procedures in accordance with plant programs and the NRC guidance on biennial procedure reviews. This change to the biennial review cycle will not result in a significant reduction in the effectiveness of plant procedure reviews.

PP&L is committed to procedural adherence. Additionally, we recognize that to maintain effective procedures, procedural reviews are necessary. We believe the most effective method to accomplish this task is by implementation of efficient procedure control programs, effective procedure change processes, and by the use of the procedures. Our existing procedure programs assure that revisions to plant activities are incorporated into the applicable procedures in a timely manner to assure proper performance of the system or function. The procedure change process incorporates instructions addressing the change preparation, reviews, authorizations, approvals, issuance, and the use and control of revised procedure. Also, Nuclear Department personnel understand the necessity for and the use of procedures, and therefore, recognize the importance of using updated procedures. However, performing procedure reviews biennially, as is currently required, is a redundant process that effectively serves no safety, operational or regulatory purpose. Therefore, PP&L is submitting this change to revise the biennial review of plant procedures to reflect our existing procedural review processes.

Attachment 1 contains the proposed Susquehanna FSAR Chapter 17.2 change. Attachment 2 contains justification for the revision to the biennial review requirements. The programs described in Attachment 2 are fully implemented; however, some procedural upgrades/revisions to improve procedural review consistency and incorporate NRC guidance are currently being implemented. These changes will be finalized prior to initiating an approved revised program. Additionally, existing plant procedure programs will be revised to modify the review frequencies following NRC approval of this request.

Q004 1/1

Please contact R. D. Kichline (610) 774-7916 if you have any questions concerning this submittal.

Very truly yours,

R. G. Byram

Attachments

cc: NRC Region I
Mr. C. L. Miller, NRC - OWFN
Mr. G. S. Barber, NRC Sr. Resident Inspector - SSES
Mr. C. Poslusny, Jr., NRC Project Manager - Rockville

The OQA Program requires that safety-related activities be performed by properly qualified personnel under suitably controlled conditions. Controlled conditions include: the use of appropriate tools and equipment, processes and procedures; suitable environmental conditions; and assurance that prerequisites have been satisfied. The OQA Program also addresses the need for verification of quality by inspection, examination, and test.

The Manager - NQA is responsible for establishing and maintaining the OQA Program and for ensuring that it provides adequate control of all activities. The Manager - NQA is responsible for assuring that functions delegated to principal contractors are being properly accomplished. Supplier QA programs are evaluated to determine that the requirements of 10CFR50 Appendix B will be implemented and this evaluation is documented.

The corporate OQA policies, goals, and objectives are transmitted to the persons performing activities which are required by the OQA Program and supporting documents. The commitments of the OQA Program are described in FSAR Section 17.2 which also assigns responsibilities for implementing OQA Program commitments. The OQA Manual contains Operational Policy Statements (OPS) which stipulate PP&L QA policies, goals and objectives for implementing the OQA Program commitments. These policies give generic direction for the performance of activities. A synopsis of the OPS and a matrix which cross-references them to each criterion of Appendix B to 10 CFR Part 50, is contained in Table 17.2-2.

In accordance with NRC memorandum titled "Biennial Procedure Reviews" dated December 21, 1992, and plant procedure programs.

The OQA Program is patterned after and fully complies with ANSI N18.7-1976 as modified by NRC Regulatory Guide 1.33, Revision 2 except for the review frequency of ~~certain~~ procedures, ~~which employ standardized methods for reagent preparation.~~ The review frequency for ~~these reagent preparation~~ procedures will be established appropriate to the nature of the activities addressed by the procedures. The degree of compliance with other regulatory guides and associated ANSI Standards is listed in Table 17.2-1. Where guides, codes or standards are nonexistent or inadequate, PP&L will develop methods to provide the necessary control. The OQA Program requirements are mandatory for all safety-related activities. Each functional unit manager is responsible for assuring that safety-related activities performed by that functional unit meet the requirements of the OQA Program. The Manager - NQA is responsible for the audit, review, inspection and verification of activities both on site and offsite to assure that they are accomplished according to the OQA Program requirements. QC activities shall be performed in compliance with the OQA Program requirements.

TABLE 17.2-1

OPERATIONAL QUALITY ASSURANCE PROGRAM

COMPLIANCE MATRIX

NRC Reg. Guide	ANSI Standard	Subject	Clarifications & Exceptions
1.8 Rev. 1	ANS 3.1 - 1978	Personnel Selection & Training	Chapter 13
1.28 Rev. 1	N45.2 - 1977	QA Program Requirements for Nuclear Facilities	Full compliance
1.30 8/72	N45.2.4 - 1972*	Electrical Installation, Inspection & Testing	Commitment to the extent required by ANSI N18.7-1976. Calibration status of installed plant instrumentation is maintained via a computer information system.
1.33 Rev. 2	N18.7 - 1976	Administrative Controls & Operational QA	Full compliance except for review frequency of ~~certain reagent preparation~~ procedures.
1.37 3/73	N45.2.1 - 1973*	Cleaning Fluid Systems & Components	Commitment to the extent required by ANSI N18.7-1976.
1.38 Rev. 2	N45.2.2 - 1972*	Packaging, Shipping, Receiving, Storage & Handling	Commitment to the extent required by ANSI N18.7-1976.
1.39 Rev. 2	N45.2.3 - 1973*	Housekeeping	Commitment to the extent required by ANSI N18.7-1976.
1.54 6/73	N101.4 - 1972*	QA for Protective Coatings	

QS modified by NRC memorandum titled "Biennial Procedure Reviews" dated December 21, 1992

ATTACHMENT 2

JUSTIFICATION FOR PROPOSED CHANGE

Pursuant to 10CFR50.54 (a) (3), PP&L is requesting approval of a change to the Susquehanna Steam Electric Station's (SSES) Final Safety Analysis Report (FSAR) to revise biennial procedure review requirements of plant procedures. Justification for the proposed change is based upon Nuclear Department programs, and enhancements to these programs based on NRC guidance concerning biennial procedural reviews (dated December 21,1992).

The SSES FSAR currently requires biennial reviews of certain plant procedures pursuant to ANSI N18.7-1976, Section 5.2.15 to meet Regulatory Guide 1.33. This ANSI standard states in part that "plant procedures shall be reviewed...no less frequently than every two years ..."; however, it also states in part that "the frequency of subsequent reviews (after initial use) shall be specified and may vary depending on the type and complexity of the activity involved, and may vary with time as a given plant reaches operational maturity." The purpose of these periodic reviews is to ensure that currently used procedures include the latest information available to assure safe operation of the plant. At SSES programs are currently established that effectively assure procedures are upgraded to current information. Additionally, to assure effective programmatic control, a number of programs are being revised in accordance with NRC guidance concerning biennial procedure reviews to assure consistent procedural review application.

PP&L is committed to procedural adherence. Additionally, we recognizes the significance of procedures that reflect the current as-built plant design conditions, and other facets of plant operations. To maintain effective procedures, procedural reviews are necessary. We believe the most effective method to accomplish this task is by implementation of efficient procedure control programs and by the use of the procedures. Our existing procedure programs assure that revisions to plant activities are incorporated into the applicable procedures in a timely manner to assure proper performance of the system or function. Also, Nuclear Department personnel understand the necessity for and the use of procedures, and therefore, recognize the importance of using updated procedures. However, performing procedure reviews biennially, as is currently required, is a redundant process that effectively serves no safety, operational or regulatory purpose. Therefore, PP&L is submitting this change to revise the biennial review of plant procedures to reflect our existing procedural review processes. This change to the biennial review cycle will not result in a significant reduction in the effectiveness of plant procedure reviews.

The following Nuclear Department programs provide reasonable assurances that plant procedures are accurately and adequately reviewed. Where noted, revisions to the programs are being made to either assure consistency of procedure reviews, or conform to NRC guidance. These revisions will be completed prior to revising the biennial review requirements.

Procedural Controls - The SSES procedures controls program requires that all affected procedures be reviewed following specific events. These events include: unusual incidents, such as an accident, an unexpected transient, significant operator errors, or equipment malfunctions where the procedure contributed to the cause of the incident or where the procedures were inadequate in mitigating the effects of the incident.

Design/Modification Program - The SSES plant procedures are based on the latest design. Plant procedures potentially affected by a plant design change/modification are required to be reviewed as part of the design change/modification process.

IER Program - The Industry Events Review Program (IERP) is the primary mechanism that is utilized to review industry events at SSES. Because of the significance of INPO SOERs, a specific program is also in place to address them. Currently a review of procedures, as appropriate, is conducted as part of these review processes; however, these programs are being revised to specifically identify procedural reviews as part of the evaluation process.

Deficiency Management Programs - The Deficiency Management program at SSES consists of three main elements; the Significant Operating Occurrence Reports (SOOR), the Nonconformance Reports (NCR), and the Engineering Deficiency Reports (EDR). Currently a review of procedures, as appropriate, is conducted as part of the deficiency management dispositioning process; however, these program elements are being revised to specifically identify procedural reviews as part of the evaluation process.

Technical Specification/FSAR Change Implementation Program - The Technical Specification (TS) change implementation program requires that existing procedures be reviewed against approved TS amendments and procedural changes be incorporated, as required by the amendment. Requirements are being incorporated into the FSAR revision procedure to assure that procedures associated with a FSAR change are reviewed as part of the FSAR revision process.

Quality Assurance Program/Audits - The QA audit program require audits of programs that are identified in the Operational Quality Assurance (OQA) program at SSES. Document control, which includes procedures, is a 10CFR50 Appendix B component of the SSES OQA program, and is therefore, incorporated in the existing audit program. The SSES QA audit program will be enhanced to assure that the biennial Document Control audit includes: evaluation of plant procedures for acceptability, the procedure program implementation, and deficiency resolution efforts.

Regulatory Required Reviews - Procedural review frequencies established for programs associated with other regulatory requirements (e.g. Security Plan, Emergency Plan, applicable procedures associated with Commonwealth of Pennsylvania regulations) will be maintained. Procedural controls associated with these programs will not change.

Procedure Change Process - The procedure change program provides for the preparation, review (to included 10CFR50.59 reviews), authorization, approval, issuance, and use and control of plant procedure revisions. These processes effectively establish a mechanism to assure that the review of plant procedures is performed in a manner that maintains the accuracy and quality of revised procedures, and also assures that revised procedures received the appropriate departmental committee reviews. In addition, PP&L's Nuclear Department's defense-in-depth policy requires that procedure reviews be performed in a professional manner that is consistent with the values of the department.

In accordance with NRC guidance, the following plant procedures will retain a biennial review cycle: Emergency Operating Procedures (EOP's), Off Normal Procedures (ON's), Emergency Preparedness (EP) Position Specific Procedures (PSP's), and any event driven procedures. Additionally, a requirement to review plant procedures (prior to use) that have not been used in the previous two years, is being incorporated into the procedures and instructions program.

PP&L considers the existing programs currently implemented at SSES, coupled with incorporation of the additional program elements identified in NRC guidance, to satisfactorily comply with ANSI N18.7-1976 requirements for procedure reviews. Therefore, the revision to the biennial review cycle will not result in a significant reduction in the effectiveness of plant procedure reviews.

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EXTERNAL:	DMB/OSS	1	1	IHS	1	1
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JUL 14 1994

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR FSAR/QUALITY ASSURANCE
CHANGE APPROVAL
PLA-4142 FILE R41-2

Docket Nos. 50-387
and 50-388

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