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AUTH. NAME      AUTHOR AFFILIATION      R  
BYRAM, R.G.      Pennsylvania Power & Light Co.  
RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Forwards justification for proposed QA program change re  
elimination of biennial procedure review requirements.      O

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# Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Robert G. Byram  
Senior Vice President-Nuclear  
610/774-7502  
Fax: 610/774-5019

SEP 18 1995

U. S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
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**SUSQUEHANNA STEAM ELECTRIC STATION  
REQUEST FOR FSAR/QUALITY ASSURANCE  
CHANGE APPROVAL FOR NON ROUTINE  
PROCEDURE REVIEWS  
PLA-4363**

**FILE R41-2**

Docket Nos. 50-387/NPF-14  
and 50-388/NPF-22

- References:*
1. Letter from Michael C. Modes to R. G. Byram, "Susquehanna Steam Electric Station Request for FSAR Quality Assurance Approval", dated August 15, 1994.
  2. Letter from Robert G. Byram to USNRC, "Request for FSAR/Quality Assurance Change Approval", dated July 14, 1994 (PLA -4142).

In accordance with 10CFR50.54 (a)(3) Pennsylvania Power and Light Company (PP&L) requests approval to change the Quality Assurance Program as described in the Final Safety Analysis Report. The proposed change will modify a commitment to ANSI N18.7 - 1976 Section 5.2.15 concerning the frequency of procedure reviews. PP&L proposes to revise the current biennial review requirement for certain nuclear plant procedures with a requirement to review procedures upon identification of new or revised source material that could affect the procedures. In addition, for procedures which are infrequently used, PP&L proposes a six year periodic review frequency. PP&L is pursuing this change as a Cost Beneficial Licensing Action to reduce the administrative burden and cost of current biennial procedure review requirements. PP&L calculates the savings from the proposed change in excess of \$200,000 per year. PP&L remains committed to procedural adherence, but has found that biennial procedure review infrequently results in the identification of discrepancies which impact procedure quality or effectiveness.

The NRC granted PP&L approval to revise biennial review requirements for routine plant procedures in accordance with existing procedure control programs and the December 21, 1992 NRC memorandum titled "Biennial Procedure Reviews" (Reference #1). The enclosure to the NRC memorandum states that non routine procedures (such as emergency operating procedures, off normal procedures, procedures which implement the emergency plan, etc.) should be reviewed at least every two years and revised as appropriate. The procedures affected by the currently proposed change are non routine under the NRC guidance. However, the attached justification for the proposed change (Attachment 1) identifies the controls used to ensure that these procedures are adequately maintained in accordance with 10 CFR 50 Appendix B, and the Quality Assurance Program as amended.

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The proposed change applies to two classes of event driven procedures; those which are routinely used during operator training and requalification activities or during the performance of emergency preparedness drills, and those which may be less frequently used, but which require timely implementation when called upon (ie. off normal procedures). All of the procedures are enveloped by our administrative programs designed to ensure ongoing procedural quality. In the case of routinely used event driven procedures, the proposed change employs a dynamic process for procedure review and updating, independent sampling of procedures to ensure the ongoing effectiveness of procedure review/revision, and a commitment to review procedures prior to use if procedure implementation exceeds two years, as the means to maintain procedural quality. For the second class of less frequently used event driven procedures, the proposed change employs a six year periodic review frequency in addition to the dynamic process for procedure review and updating, and independent sampling of procedures, to maintain procedural quality. Attachment 2 contains the proposed Susquehanna FSAR Chapter 17.2 change which reflects the proposed change.

The proposed change is based on changes which have been implemented at several other plants, including the Fort Calhoun Station in April of 1994, and the Beaver Valley Station in April of 1995. Please contact Mr. James M. Kenny at (610) 774-7535 if you have any questions concerning this submittal.

Very truly yours,



R. G. Byram

Attachments

copy: Regional Administrator - Region I  
Ms. M. Banerjee, NRC Sr. Resident Inspector  
Mr. C. Poslusny, Jr., NRC Sr. Project Manager

**JUSTIFICATION FOR PROPOSED QA PROGRAM CHANGE  
ELIMINATION OF BIENNIAL PROCEDURE REVIEW REQUIREMENTS**

On July 14, 1994, PP&L requested NRC approval of a change to our Final Safety Analysis Report (FSAR) to eliminate the requirement to perform biennial review of routine plant procedures. This request was based upon existing Susquehanna Steam Electric Station (SSES) procedure control programs and guidance described in NRC memorandum titled "Biennial Procedure Reviews" and dated December 21, 1992. NRC approved our request by correspondence dated August 15, 1994.

The guidance provided in paragraph 2 of the enclosure to the NRC memorandum states that emergency operating procedures, off normal procedures, emergency plan implementing procedures and procedures whose usage may be dictated by an event (non routine procedures) continue to be reviewed biennially. Based on usage of these procedures we believe that a biennial review frequency is unnecessary to assure that event driven procedures remain accurate and effective. Therefore, pursuant to 10CFR50.54 (a) (3), PP&L is requesting approval of a change to the SSES FSAR to eliminate the biennial procedure review requirements for plant emergency operating procedures, off normal procedures, emergency plan implementing procedures<sup>1</sup>, and other procedures whose usage may be dictated by an event.

In place of the current biennial review requirement, PP&L is proposing an approach to procedure review/revision which is tailored to maximize procedure quality and review cost effectiveness. PP&L divides event driven procedures into two groups for the purposes of review/revision. The first group is made up of those procedures which are routinely used during operator training and requalification activities or during the performance of emergency preparedness drills. Examples of these procedures include emergency operating procedures and procedures which implement the emergency plan. As such, over a two year period, these procedures are reviewed through usage. Inaccurate or non-current information is identified and corrected. These procedures are also updated as a result of our dynamic process for procedure review and updating which is triggered by a number of diverse and complimentary programs described later in this analysis. Additionally, PP&L will perform biennial Document Control audits on a sample of the subject procedures, and commits to review any affected procedure which has not been used in the previous two years prior to use.

The second group of event driven procedures are those that may be less frequently used, but which require timely implementation when called upon. Examples of these procedures include off normal procedures and alarm response procedures. These procedures are also updated as a result of our dynamic process for procedure review and updating. Additionally, PP&L will perform biennial Document Control audits on a sample of the subject procedures. However, because of

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<sup>1</sup> Susquehanna SES Emergency Plan section 9.2.2 contains the current biennial review requirement for Emergency Plan implementing procedures (EP-PSPs), and will need to be amended based on approval of the proposed change.



their nature and infrequent use, PP&L proposes a six year periodic review requirement for this class of procedures. The relaxation to a six year review frequency is considered fully adequate to maintain procedure quality given the implementation of biennial Document Control audits on a sample of the subject procedures, the scope and complementary nature of the dynamic review process, and PP&L's experience in performing biennial reviews. PP&L has found that biennial procedure review infrequently results in the identification of discrepancies which impact procedure quality or effectiveness.

PP&L believes that the usage of these event driven procedures, coupled with the aforementioned controls to ensure procedure quality, meets the intent of the procedure review guidance of ANSI N18.7-1976 and is consistent with the quality considerations of 10 CFR 50 Appendix B. A graphical summary of the controls PP&L has in place, or is proposing, to maintain procedure quality is provided later in this analysis.

PP&L is committed to procedural adherence. Additionally, we recognize the significance of procedures that reflect the current as-built plant design conditions, and other facets of plant operation. To maintain effective procedures, procedural reviews are necessary. We believe the most effective method to accomplish this task is through 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, after thirteen years of licensed activity, Susquehanna SES has achieved operational maturity and our personnel understand the necessity of procedures, and therefore recognize the importance of using accurate procedures.

The following Nuclear Department programs provide reasonable assurances that plant procedures are accurately and adequately reviewed.

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. In addition, Susquehanna has implemented procedural controls to ensure that a review of plant procedures, subject to ANSI N18.7-1976, is performed (prior to use), for routine procedures that have not been used in the previous two years.

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, and to meet the guidance provided in NUREG-0737. Because of the significance of INPO SOERs, a specific program is also in place to

address them. These programs require a review of procedures, as appropriate, as part of the event review process.

Deficiency Management Programs - The Deficiency Management program at SSES is controlled by the Condition Report (CR) program. This program requires a review of procedures, as appropriate, as part of the deficiency management dispositioning 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. Also, procedures associated with FSAR revisions are required to be reviewed as part of the FSAR change process.

Quality Assurance Program/Audits - The QA audit program requires 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 biennial Document Control audit scope includes; evaluation of plant procedures for acceptability, procedure program implementation, and deficiency resolution efforts. The procedures identified in this proposed change will be integrated into the biennial Document Control audit scope, to ensure that a representative sample of procedures are evaluated.

Regulatory Required Reviews - Procedural review frequencies established for programs associated with other regulatory requirements (e.g. 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.

For event driven procedures, PP&L considers that our existing programs to identify and implement procedural revisions, coupled with the usage of these procedures in our licensed operator requalification and/or emergency preparedness drill activities, in addition to procedure sampling, and pre-implementation or six year review of infrequently used procedures, results in satisfactory compliance with ANSI N18.7-1976 requirements for procedure reviews; and therefore, does not result in a significant reduction in the effectiveness of plant procedure reviews.



# NON ROUTINE PROCEDURE REVIEW

## SUMMARY OF PROGRAM CONTROLS

The following matrix lists the programmatic controls which are in place, or will be implemented, to maintain procedure quality. The matrix divides quality related procedures into three categories for the purposes of review/revision. PP&L previously received approval to eliminate biennial review requirements for category 1 procedures (routine procedures). The currently proposed change affects category 2 and 3 procedures; however, all three categories are shown here for completeness.

### PROGRAMMATIC CONTROLS

CATEGORY	Dynamic Review	Biennial Audit of Sample	Review Prior to Use if > 2 Yrs.	6 Yr. Periodic Review
1 Procedures routinely used to support plant operation. <i>(Previously approved by NRC)</i>				
2 Procedures which are driven by an event, but which are routinely used in training and drilling.				
3 Procedures, driven by an event, which may be used less frequently than every two years.				



*Enhanced programmatic controls (Proposed).*



*Existing programmatic controls.*

SSSES-FSAR

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.

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 procedures. The review frequency for procedures will be established appropriate to the nature of the activities addressed by the procedures ~~in accordance with NRC memorandum titled "Biennial Procedure Reviews" dated December 21, 1992, and plant procedure programs.~~ 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.

Rev. 48, 12/94

17.2-13

and in accordance with; NRC memorandum titled "Biennial Procedure Reviews" dated 12/21/92, NRC QA Program change approval as documented in a letter from "TBD" on "DATE",



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 procedures as modified by NRC memorandum titled "Biennial Procedure Reviews" dated December 21, 1992, and frequency of program audits.
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	
1.58 Rev. 1	N45.2.6 - 1978*	Qualifications of Inspection, Examination, & Testing Personnel	Commitment to the extent required by ANSI N18.7-1976; personnel who only handle test results or perform document control activities will not be certified.

ATTACHMENT 2  
 PLA-4363  
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NRC QA Program change approval as documented in a letter from "TBD" on "DATE",

