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L-19-178

10 CFR 50.54(a)(4)

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

SUBJECT:

Davis-Besse Nuclear Power Station, Unit No. 1

Docket No. 50-346, License No. NPF-3

Response to Request for Additional Information Regarding Request for Approval of Decommissioning Quality Assurance Program for the Davis-Besse Nuclear Power Station (EPID L-2019-LLQ-0000)

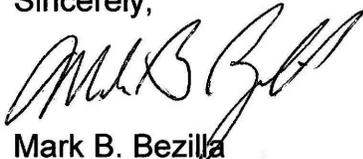
By letter dated April 30, 2019 (Accession No. ML19120A209), FirstEnergy Nuclear Operating Company (FENOC) submitted a request for approval of the decommissioning quality assurance program (DQAP) for Davis-Besse Nuclear Power Station (DBNPS), Unit No. 1, in preparation for the transition of DBNPS to a permanently defueled condition.

On June 28, 2019, the Nuclear Regulatory Commission (NRC) staff requested additional information to complete its review. The FENOC response is attached.

The information provided by this submittal does not invalidate the previous findings of the evaluation conducted in accordance with 10 CFR 50.54(a).

There are no regulatory commitments contained in this submittal. If there are any questions, or if additional information is required, please contact Mr. Thomas A. Lentz, Manager, Nuclear Licensing and Regulatory Affairs, at (330) 315-6810.

Sincerely,



Mark B. Bezilla

Attachment: Response to Request for Additional Information

Davis-Besse Nuclear Power Station, Unit No. 1
L-19-178
Page 2

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager
Utility Radiological Safety Board

Response to Request for Additional Information
Page 1 of 2

The NRC staff's request for additional information is provided in bold text followed by the FENOC response.

Request for Additional Information

Criterion XVIII, "Audits," of Appendix B, "Quality Assurance Program Criteria for Nuclear Power Plants and Fuel Reprocessing Plants," to Title 10 of the Code of Federal Regulations Part 50 states, in part, that audits shall be performed by "personnel not having direct responsibilities in the areas being audited."

Paragraph 18.1 of the proposed DQAP [decommissioning quality assurance program] states, in part:

Measures shall be established for a system of planned and documented audits in order to verify compliance with all aspects of the DQAP and determine the effective implementation of programs covered by the DQAP.... Audit personnel shall not have direct responsibilities in the areas to be audited.

However, paragraph 12.3 of the proposed DQAP suggests that the production management position is responsible for measuring and test equipment (M&TE) and auditing of the M&TE processes. Paragraph 12.3 states, in part (emphasis added):

The management position responsible for production is responsible for the governance of M&TE [measuring and test equipment] and oversight of the site calibration process for Davis-Besse.... This management position is also responsible for governance and oversight of site M&TE Control. This includes assessment of site compliance to the control of M&TE as defined in corporate maintenance procedural guidance.

Confirm that the responsibilities for production and auditing are delegated to separate management positions. Explain how the "assessment" of site compliance to the control of M&TE is different from the "auditing" of this process.

Response:

In the proposed DQAP, Nuclear Oversight is described in Section 1.2.1. The management position responsible for Davis-Besse Nuclear Oversight reports to a corporate management position responsible for Nuclear Oversight, who then reports to the Chief Nuclear Officer (CNO). This reporting chain is responsible for managing periodic audits and quality verification inspections to verify that activities within the scope of the DQAP are performed correctly.

The station management position responsible for production is described in Section 1.3.1. This station management position reports to the station top level management position, who then reports to the CNO. This reporting chain is responsible for station activities and the implementation of quality assurance policies, goals, and objectives.

These two reporting chains are clearly separate and confirm that responsibilities for audit and production are delegated to separate management positions.

“Assessment” in the last sentence of Section 12.3 of the proposed DQAP is not intended to include responsibilities for the performance of an audit. An assessment includes activities such as, but not limited to, self-assessment of the program, use of performance indicators, trending, and field observations. In this context, an assessment evaluates performance against established standards. These standards are generally derived from industry best practices and may include items such as industrial safety, radiological safety, environmental safety, human performance tool use, performance improvement, and training program effectiveness.

“Auditing” is a documented activity performed in accordance with written procedures or checklists to verify, by examination and evaluation of objective evidence, that applicable elements of the quality assurance program have been developed, documented, and effectively implemented in accordance with specified requirements.

FENOC recognizes that the use of “assessment” in Section 12.3 may confuse the roles and responsibilities of the station management chain and thus encroach on the independence of audit personnel. Therefore, FENOC hereby deletes the last sentence in Section 12.3. The revised section is as follows:

12.3 The management position responsible for production is responsible for the governance of M&TE and oversight of the site calibration process for Davis-Besse. This includes the establishment of calibration practices, intervals, accuracy requirements, certification/de-certification, and equivalency decisions, as well as the resolution of technical issues regarding M&TE calibration. This management position is also responsible for governance and oversight of site M&TE Control.

The revised Section 12.3 maintains the responsibility for governance and oversight of the site M&TE Control while eliminating potential confusion regarding the independence of audit personnel.