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Docket Number 50-346

License Number NPF-3

Serial Number 1-957

July 31, 1991

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Subject: Request For Change in Quality Assurance Program Biennial  
Procedure Review

Gentlemen:

The Toledo Edison Company hereby submits, pursuant to 10 CFR 50.54(a)(3), a proposed alternative to the requirement to perform biennial reviews of plant procedures in accordance with ANS/ANSI 3.2-1982, Administrative Controls and Quality Assurance For Nuclear Power Plants. In place of this review, Toledo Edison has existing programmatic controls that continually identify changes to and update procedures at the Davis-Besse Nuclear Power Station, Unit Number 1. In addition to these programmatic controls, an annual quality assurance surveillance of randomly selected procedures will be conducted following approval of this proposed change. This annual surveillance will provide assurance that procedures are being maintained current.

This change, as indicated in the attached 10 CFR 50.54(a) review, has been identified as a reduction to the commitments identified in USAR Chapter 17.2, Quality Assurance Program for Station Operation. Although this change has been identified as a reduction in commitment, the Quality Assurance Program continues to satisfy the criteria of 10 CFR 50, Appendix B.

Toledo Edison requests your approval of the proposed change by August 30, 1991. This expeditious review is requested due to the large number of man-hours that would be utilized in performing unnecessary biennial reviews of procedures during the upcoming seventh refueling outage (7RFO). Elimination of the static biennial review would permit redirection of resources to procedure changes resulting from plant changes during the 7RFO.

Operating Companies:  
Cleveland Electric Illuminating  
Toledo Edison

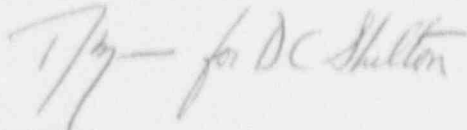
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If you have any questions concerning this matter, please call  
Mr. R. W. Schrauder, Manager - Nuclear Licensing, at (419) 249-2366.

Very truly yours,

A handwritten signature in dark ink, appearing to read "JCS/ach" or similar, written in a cursive style.

JCS/ach

Attachment

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector  
A. B. Davis, Regional Administrator, NRC Region III  
J. B. Hopkins, NRC/NRR DB-1 Senior Project Manager  
Utility Radiological Safety Board

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BIENNIAL PROCEDURE REVIEW PROCESS REVISION

Attachment, page 1	Proposed exception to ANS/ANSI 3.2-1982 Section 5.2.15
Attachment, page 2	10CFR50.54 review

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Table 17.2-1 (Continued)

APPLICABLE NRC REGULATORY GUIDES, ANSI STANDARDS, AND INDUSTRY CODES

NRC REGULATORY GUIDE,  
INDUSTRY CODES

ANSI STANDARDS

TOLEDO Edison POSITION

- ANSI/ANS 3.2-1982  
"Administrative Controls  
and Quality Assurance For  
Nuclear Power Plant"
- F. Section 5.2.15 requires that "plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable. This requirement for routine follow-up review, can be accomplished in several ways, including (but not necessarily limited to): documented step-by-step use of the procedure (such as occurs when the procedure has a step-by-step checkout associated with it), or detailed scrutiny of the procedure as part of a documented training program, drill, simulator exercise, or other such activity. A revision of a procedure constitutes a procedure review." In lieu of these requirements, Davis-Besse has many existing programmatic controls, which identify the necessity for procedure alterations to ensure that procedures are appropriate for the circumstance and are maintained current. Additionally, Davis-Besse performs an annual Quality Assurance surveillance of randomly selected plant procedures. The surveillance will provide added assurance that existing programmatic controls provide for timely revision of procedures.

17.2-54a

10 CFR 50.54 Review July 18, 1991

PROPOSED REPLACEMENT OF BIENNIAL REVIEW OF PLANT PROCEDURES WITH PROGRAMMATIC CONTROLS AND YEARLY SURVEILLANCE.

Change Number 1

Table 17.2-1, add Item 4, Position 1.F, page 17.2-54a.

Description of Change

- F. Section 5.2.15 requires that "Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable. This requirement for routine follow-up review, can be accomplished in several ways, including (but not necessarily limited to): documented step-by-step use of the procedure (such as occurs when the procedure has a step-by-step checkoff associated with it), or detailed scrutiny of the procedure as part of a documented training program, drill, simulator exercise, or other such activity. A revision of a procedure constitutes a procedure review." In lieu of these requirements, Davis-Besse has many existing programmatic controls, which identify the necessity for procedure alterations to ensure that procedures are appropriate for the circumstance and are maintained current. Additionally, Davis-Besse performs an annual Quality Assurance surveillance of randomly selected plant procedures. The surveillance will provide added assurance that existing programmatic controls provide for timely revision of procedures.

Reason for Change 1

Toledo Edison proposes deleting the requirement for a biennial review of plant procedures. Maintaining Plant Procedures current to preclude the use of outdated or inappropriate procedures is a dynamic process. The need for procedure changes may be identified at various times for various reasons. Changes are evaluated for implementation at the time of identification. Davis-Besse has developed many programs which enhance the procedure alteration process which provides assurance that procedures are appropriate for the circumstances and remain current/up-to-date. These programmatic controls address the intent of the static biennial review process and from both a technical and a practical perspective, provides greater assurance that procedures will be maintained current. The biennial review is redundant to the established programmatic controls and is no longer considered necessary. These existing controls are described below:

1. The Plant Modification Program requires an interfacing document review and alteration of procedures affected by the modification be performed. The Program provides additional measures for assuring that all procedures affected by the modification are updated to reflect the changes, prior to returning the modified system to service.
2. The Potential Condition Adverse to Quality Reporting and Management Corrective Action Reporting Programs require that an evaluation for disposition be performed and remedial action(s) be taken to fix or improve an identified condition adverse to quality. These actions may identify procedural inadequacies and require a procedure(s) alteration to preclude recurrence.

Reason for Change 1 (Continued)

3. The Test Control Program requires that test personnel are qualified to perform the test procedure, and the use of approved and controlled test procedures. Deficiencies encountered during the conduct of test procedures are documented and evaluated to determine if test procedure alteration is needed. Resolution is provided prior to final approval of the test results.
4. The Conduct of Operations and Maintenance Control Programs require the use of approved and controlled procedures by qualified personnel, and strict adherence to procedures. The program also encourages user feedback on the adequacy of procedures and prompt identification and initiation of necessary procedure alterations and actions to be taken when procedures cannot be performed as written.
5. The Preparation and Control of Updated Safety Analysis Report (USAR) Changes Program requires that when changes are being made to the USAR an interfacing document review of procedures be performed. Affected procedures are altered prior to issuing the USAR change.
6. The Revision, Review and Control of Quality Assurance Manuals requires that when changes are being made to the Quality Assurance Manuals an interfacing document review of procedures be performed. Affected procedures are altered prior to issuing the manual revision.
7. The Vendor Manual Control Program provides for the procurement, receipt, review, approval, change, control and distribution of vendor manuals and other vendor technical information. The program requires approval of vendor manuals or vendor correspondence prior to use. Subsequent revisions & changes to vendor manuals and other vendor technical information are also approved and procedures are reviewed for impact and approval provisions are made to ensure that affected procedures are current.
8. The Operating Experience Assessment Program provides measures for ensuring that NRC Notices, Significant Operating Experience Reports, Significant Event Reports, Significant By Other Notifications, Operating Plant Experience Reports, Operations and Maintenance Reminders, Preliminary Safety Concerns and Transient Assessment Program Reports are evaluated to determine if programmatic or technical inadequacies exist at Davis-Besse. The program includes provisions for ensuring appropriate corrective action is taken when an inadequacy is identified. These evaluations can have an impact on procedures and require procedure alterations to enable closure of the applicable report.
9. The Operating License Amendments Program requires an interfacing document review and that procedures affected by the proposed licensing amendments are identified and altered to be consistent with the amendment requirements.
10. The Commitment Management Program provides measures for ensuring that procedures which implement commitments made to regulatory agencies are maintained current.

\* Reason for Change 1 (Continued)

11. The Specifications Program requires an interfacing document review to identify procedures which may be affected by a proposed specification or specification alterations. The program has provisions for ensuring that alterations to the affected procedures is made effective concurrently with the issue of the specification or specification alteration.
12. The Control of Procedures Program requires an interfacing document review to identify procedures which are affected by development or alteration of a procedure. The program also has provisions for ensuring that required alterations to affected procedures are made effective concurrently.
13. The Quality Assurance Audit and Surveillance Program provides added assurance that procedures are adequate, appropriate to the circumstances and do not contain outdated information. These attributes are verified during the performance of audits and surveillances.
14. The Setpoint Control Program requires an interfacing document review to identify procedures which are affected as a result of a setpoint change. The program contains provisions for ensuring affected procedures are altered concurrent with the setpoint change.
15. The Document Change Request Program provides measures for ensuring that an interfacing document review be performed to identify procedures which may be affected by changes to configuration control documents. It contains provisions for assuring that impacted procedures are updated prior to effectivity and closeout of the Document Change Request.

Additionally, Davis-Besse will perform an annual surveillance of randomly selected plant procedures to ensure that the existing programmatic controls are maintaining plant procedures current.

Effect of Change on the Davis-Besse USAR Chapter 17.2 Quality Assurance Program Description Commitments

This change reduces the Quality Assurance Program description commitments previously accepted by the NRC. The proposed change is a change to a quality assurance program description. Since the proposed change eliminates the biennial review of plant procedures it represents a reduction in commitment. NRC approval is required prior to implementing the proposed change.

The basis for concluding that this change continues to satisfy the criteria of 10CFR50 Appendix B and the Safety Analysis Report quality assurance program description commitments previously accepted by the NRC is as follows:

The requirements of 10CFR50 Appendix B Criteria 5 and 6 are still fully satisfied by USAR 17.2.5 and 17.2.6 which remains unchanged. The proposed change provides an alternate method for ensuring that procedures remain current and appropriate for the circumstances.