

ENCLOSURE 1

PROPOSED TECHNICAL  
SPECIFICATION CHANGES  
(MARKED PAGES)

BROWNS FERRY NUCLEAR PLANT

LIST OF AFFECTED PAGES

UNIT 1

6.0-14

6.0-15

UNIT 2

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UNIT 3

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6.0-15

JUN 30 1988

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions, ~~at least once per 12 months.~~
- b. The performance, training and qualifications of the entire plant staff. ~~at least once per 12 months.~~
- c. The results of actions taken to correct deficiencies occurring in site equipment, structures, systems or method of operation that affect nuclear safety. ~~at least once per 6 months.~~
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50<sub>x</sub>. ~~at least once per 24 months.~~
- e. ~~The Site Radiological Emergency Plan and implementing procedures at least once every 12 months. (Deleted)~~
- f. ~~The Plant Physical Security Plan and implementing procedures at least once every 12 months. (Deleted)~~
- g. Any other area of site operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power.
- h. The fire protection programmatic controls including the implementing procedures at least once per 24 months.

BFN

6.0-14

Unit 1

AMENDMENT NO. 149

SEP 22 1993

- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite license personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The Radiological Environmental Monitoring program and the results thereof, ~~at least once per 12 months.~~
- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975, ~~at least once every 12 months.~~
- ~~m. The performance of activities required by the Safeguards Contingency Plan to meet the criteria of 10 CFR 73.40(d) at least once every 12 months. (Deleted)~~
- n. The Offsite Dose Calculation Manual and implementing procedures, ~~at least once per 12 months.~~
- o. The Process Control Program and implementing procedures for solidification of wet radioactive wastes, ~~at least once per 24 months.~~
- p. (Deleted)

APR 01 1993

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- e. ~~The Site Radiological Emergency Plan and implementing procedures at least once every 12 months. (Deleted)~~
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SEP 22 1993

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ENCLOSURE 2

DISCUSSION AND  
SIGNIFICANT HAZARDS  
CONSIDERATION EVALUATION

BROWNS FERRY NUCLEAR PLANT



## Discussion of Changes

### Introduction

Currently, the Administrative Controls section of the Standard Technical Specifications for General Electric Plants (NUREG-1433, Vol. 1) states that the combination of reviews and audits should be integrated "into a cohesive program that provides senior management with an assessment of facility operation and recommends actions to improve nuclear safety and plant reliability." Therefore, these administrative tools should be sufficiently flexible to allow for senior management direction of resources to focus upon areas requiring increased attention. The proposed changes to the Technical Specification administrative controls would provide such flexibility through the elimination of certain rigid audit frequencies.

Additionally, references to reviews and audits of the facility's Radiological Emergency Plan, and Physical Security/Safeguard Contingency Plan (and of their associated implementing procedures) would be removed from the Technical Specifications because those requirements presently exist within the individual Plans. This action reflects the guidance provided in an NRC Generic Letter 93-07, dated December 28, 1993, and is similar to the Virginia Power submittal of July 20, 1993

### Background

The minimum scope and schedules for the audit program have been specified by the Administrative Controls section of the facility's Technical Specifications. The specific audits and their associated minimum frequencies have been developed and implemented to comply with requirements from various sources including the Code of Federal Regulations (Physical Security Program, Fitness For Duty Program, etc.), Standard Technical Specifications, NRC Generic Letters, industry guidelines and standards (Conformance to Technical Specifications and Operating License, Effectiveness of Corrective Actions, and Training audits). The audits specified by these sources are meant to address programs which are deemed to be essential to the effective management of each nuclear facility. However, the rigid schedules dictated by the Technical Specifications do not allow management the flexibility to recognize good performance by

certain organizations, and resources which could be devoted to areas with perceived weaknesses are diluted by the requirement to audit strong programs at the frequencies set forth in the Technical Specifications. The proposed changes would allow for decreasing the frequencies of certain audits and maintaining the frequency of those audits presently scheduled biennially. The exceptions to this frequency extension would be those audits which have frequencies specifically delineated by the Code of Federal Regulations (i.e., Radiological Emergency Plan and Implementing Procedures Audit, Physical Security Plan and Implementing Procedures Audit, and Safeguard Contingency Plan) and audits associated with fire protection as defined by the present technical specifications.

On December 28, 1993, the NRC published Generic Letter 93-07 which provides guidance for relocating certain requirements (without reducing them) from the Technical Specifications to other NRC-approved program documents. The proposed generic communication specifically addresses the reviews and audits of the Radiological Emergency Plan and implementing procedures and the Physical Security/Contingency Plan and implementing procedures. Currently, the requirements for these reviews and audits are incorporated into the Browns Ferry Radiological Emergency and Physical Security/Contingency Plans. The proposed changes would delete the redundant references in the facilities' Technical Specifications to the requirements which originate in Title 10 of the Code of Federal Regulations [10 CFR 50.54(t) for Emergency Preparedness and 10 CFR 50.54(p), 10 CFR 73.40, 10 CFR 73.55, and 10 CFR 73.56 for Security].

#### Description Of Specific Changes

The proposed amendment would eliminate the references to specific frequencies for each of the Technical Specification required audits, except the fire protection related audits, and would eliminate reference to reviews and audits of the Radiological Emergency Plan, and Physical Security/Contingency Plan. Instead, a statement would be added to the Nuclear Quality Assurance Plan (TVA-NQA-PLN89-A) specifying that the audits listed in the Technical Specifications would be accomplished on a biennial (2 years) frequency as defined in Section 12.2.E.2 of the NQA Plan. The requirements for reviews and annual audits of the

facility Radiological Emergency Plan and Physical Security/Contingency Plan (and their associated implementing procedures) are currently delineated within the NRC-approved Radiological Emergency Plan and Physical Security/Contingency Plan for Browns Ferry Nuclear Plant as provided for in the NRC's generic communication. Each of the proposed changes to the Technical Specifications is discussed by line item below:

Browns Ferry Unit 1, Unit 2, and Unit 3 Technical Specifications:

ADMINISTRATIVE CONTROL Section 6.5.2.8 has been revised to delete the references to specific audit frequencies. In accordance with the Standard Review Plan (SRP) Section 17.3 ("Quality Assurance Program Description") guidance on planned and periodic assessments scheduling and resource allocation, the following statement has been prepared for Section 12.2.E.2 ("Audits") of the NQA Plan and is included in Enclosure 5:

Auditing organizations shall ensure that audit procedures and instructions adequately cover applicable elements of the NQAP. Audit subjects are specified in plant technical specifications and regulatory commitments. Audit frequencies shall be biennially with the exception of fire protection related audits which shall be in accordance with the plant technical specifications. The audit frequencies for programs involving each site Radiological Emergency Plan and Physical Security/Contingency Plan are as required by the Code of Federal Regulations.

Additionally, a proposal is being made in Enclosure 5 to modify alternative number 6 of NRC Regulatory Guide 1.33 in the NQA Plan. Specifically, audit frequencies, with the exception of fire protection audits, will no longer be specified in plant specific technical specifications but instead will be specified as biennial (2 year) in Section 12.2.E.2 of the NQA Plan.

This change neither alters the function nor diminishes the quality of the Audit Program. The Nuclear Safety Review Board (NSRB) retains responsibility for oversight of the Quality Assurance Audit Program. The sole change to the process is associated with the audit frequencies. Specifically, audit frequencies are being specified generically in the NQA Plan.



The Technical Specification-required audits and the impacts of the proposed changes are listed below:

- The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions.

Applicable portions of the Technical Specifications and license conditions are assessed during each audit for the particular area(s) being audited. Reducing the frequency of these audits to biennial (2 years) will not adversely impact compliance with those provisions of the Technical Specifications, the commitments in the NQA Plan to ANSI N18.7-1976, or the effectiveness of audits performed. Compliance with the Technical Specifications and license conditions is evaluated more often than each 12 months although not in a single Technical Specification audit.

- The performance, training, and qualifications of the entire plant staff.

Audits of the plant staff's qualifications ("Training Audits") are conducted annually. The proposed changes will allow management to schedule the time between specific audits to be a maximum of 24 months, as evaluated. This added versatility is not projected to adversely impact the effectiveness of either the Nuclear Training Program or the Audit Program, because management can increase or decrease the audit frequency based upon observed performance and importance to safety.

- The results of actions taken to correct deficiencies occurring in site 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, and currently, an audit is performed every six months to evaluate the programmatic controls which govern the corrective action process. The proposed Technical Specification changes would not negatively affect the review of corrective actions in each audit. Only the biannual audit of programmatic controls will be affected in that management will be given flexibility to adjust the audit's frequency based upon performance as evidenced through trends and other



performance indicators. As such, the proposed changes will not diminish the effectiveness of either the Corrective Action Program or the oversight of that program.

- The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50.

This proposed change would not impact the performance of audits on these activities since these audits are currently being performed "at least once per 24 months." The proposed change does not alter this frequency.

- The Site Radiological Emergency Plan and implementing procedures.

The proposed change would not impact those audits whose frequencies are mandated by Title 10 of the Code of Federal Regulations and the NRC-approved plans. This audit is specified in the BFN Radiological Emergency Plan.

- The Plant Physical Security Plan and implementing procedures.

The proposed change would not impact those audits whose frequencies are mandated by Title 10 of the Code of Federal Regulations and the NRC-approved plans. This audit is specified in the BFN Physical Security/Contingency Plan.

- Any other area of site operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power.

There is no impact upon this Technical Specification line item.

- The radiological environmental monitoring program and the results thereof.

This audit is currently performed once every 12 months. The proposed changes would allow the time between audits to be adjusted based upon the radiological environmental monitoring program's performance to a maximum of 24 months, as evaluated. The program's performance is and will continue to be assessed through self assessments, management reviews, QA assessments and audits, and other trend indicators. This flexibility is consistent with guidance provided by the NRC relative to the implementation of the revised 10 CFR 20.1101(c) (i.e.,

refer to NRC response to NUMARC (NEI) for question 118 in third set of Questions and Answers which indicates that an integrated program of sampling, inspections, internal reviews, independent reviews, and QA audits could be used to assess the effectiveness of the radiological protection program).

- The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December 1977 or Regulatory Guide 1.21, Rev. 1, 1974 and Regulatory Guide 4.1, Rev 1, 1975.

This audit is currently performed once every 12 months. The proposed change would allow the time between audits to be adjusted based upon the performance of the implementation of the Quality Assurance Program to a maximum of 24 months, as evaluated. The program's performance will continue to be assessed through self-assessments and audits, and other trend indicators.

- The performance of activities required by the Safeguards Contingency Plan to meet the criteria of 10 CFR 73.40(d).

The proposed change would not impact these audits whose frequencies are mandated by Title 10 of the Code of Federal Regulations and the NRC-approved plans. In addition, this audit frequency is specified in the BFN Physical Security/Contingency Plan.

- The Offsite Dose Calculation Manual (ODCM) and implementing procedures.

This audit is currently performed once every 12 months. The proposed changes would allow the time between audits to be adjusted based upon the performance of the program implementing the Offsite Dose Calculation Manual to a maximum of 24 months, as evaluated. The program's performance is and will continue to be assessed through self assessments, management reviews, QA assessments and audits, and other trend indicators. Also, the added versatility in the audit program will continue to be consistent with guidance provided by the NRC relative to the implementation of the revised 10 CFR 20.1101(c) (i.e., refer to NRC response to NUMARC (NEI) for question 118 in third set of Questions and Answers which indicates that an integrated program of sampling, inspections, internal reviews, independent reviews, and QA audits could be used to assess the effectiveness of the radiological protection program).

- The Process Control Program (PCP) and implementing procedures for solidification of wet radioactive wastes.

This proposed change would not impact the performance of audits on these activities since these audits are currently being performed "at least once per 24 months." The proposed change does not alter this frequency.

The program's performance is and will continue to be assessed through self assessments, management reviews, QA assessments and audits, and other trend indicators. Also, the added versatility in the audit program will continue to be consistent with guidance provided by the NRC relative to the implementation of the revised 10 CFR 20.1101(c) (i.e., refer to NRC response to NUMARC (NEI) for question 118 in third set of Questions and Answers which indicates that an integrated program of sampling, inspections, internal reviews, independent reviews, and QA audits could be used to assess the effectiveness of the radiological protection program).

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 such, these changes are consistent with the intent of the regulations and are an acceptable alternative.

Specific line item changes involving the audit process include:

ADMINISTRATIVE CONTROLS 6.5.2.8.a, 6.5.2.8.b, 6.5.2.8.k and 6.5.2.8.n have been revised to delete the phrase "at least once per 12 months."

ADMINISTRATIVE CONTROL 6.5.2.8.l has been revised to delete the phrase "at least once every 12 months."

ADMINISTRATIVE CONTROL 6.5.2.8.c has been revised to delete the phrase "at least once per 6 months."

ADMINISTRATIVE CONTROLS 6.5.2.8.d and 6.5.2.8.o have been revised to delete the phrase "at least once per 24 months."



ADMINISTRATIVE CONTROLS 6.5.2.8.e, 6.5.2.8.f, and 6.5.2.8.m have been deleted. The requirements for these audits (Radiological Emergency Plan, Physical Security Plan, and Safeguards Contingency Plan) are specified within the Browns Ferry Nuclear Plant Radiological Emergency Plan, and the Browns Ferry Nuclear Plant Physical Security/Contingency Plan.

#### Significant Hazards Consideration

TVA has concluded that operation of BFN units 1, 2, and 3 in accordance with the proposed change to the technical specifications does not involve a significant hazards consideration. TVA's conclusion is based on its evaluation in accordance with 10 CFR 50.91(a)(1), of the three standards set forth in 10 CFR 50.92(c). TVA's conclusion is based on the following:

1. **The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The likelihood that an accident will occur is neither increased or decreased by this Technical Specification change which only affects review and audit frequencies. This Technical Specification change will not impact the function or method of operation of plant equipment. Thus, there is not a significant increase in the probability of a previously analyzed accident due to this change. No systems, equipment, or components are affected by the proposed change. Thus, the consequences of a malfunction of equipment important to safety previously evaluated in the UFSAR are not increased by this change.

The proposed change only affects review and audit frequencies. As such, the proposed change has no impact on accident initiators or plant equipment, and thus, does not affect the probabilities or consequences of an accident.

Therefore, we conclude that this change does not significantly increase the probabilities or consequences of an accident.



2. The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not involve changes to the physical plant or operations. Since program audits do not contribute to accident initiation, a change related to audit functions cannot produce a new accident scenario or produce a new type of equipment malfunction. Also, this change does not alter any existing accident scenarios. The proposed change does not affect equipment or its operation, and, thus, does not create the possibility of a new or different kind of accident. Therefore, the proposed change does not create the possibility of a new or different kind of accident.

3. The proposed amendment does not involve a significant reduction in a margin of safety.

The proposed change concerning conduct of reviews and audits does not directly affect plant equipment or operation. Safety limits and limiting safety system settings are not affected by this proposed change.

Therefore, use of the proposed Technical Specification would not involve any reduction in the margin of safety.

Based on the above, we have determined that the Technical Specification change request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Therefore, this Technical Specification change request does not involve a significant hazards consideration.

#### Environmental Impact Consideration

The proposed change does not involve a significant hazards consideration, a significant change in the types of or significant increase in the amounts of any effluents that may be released offsite, or a significant increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), an environmental assessment of the proposed change is not required.

ENCLOSURE 3

PROPOSED TECHNICAL  
SPECIFICATION CHANGES

SEQUOYAH NUCLEAR PLANT

LIST OF AFFECTED PAGES

UNIT 1

6-11

6.12

APPENDIX B 5-2

UNIT 2

6-11

APPENDIX B 5-2

## ADMINISTRATIVE CONTROLS

- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety.
- g. All REPORTABLE EVENTS. | R62
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety.
- i. Reports and meetings minutes of the PORC. | R182

## AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions, ~~at least once per 12 months.~~
- b. The performance, training and qualifications of the entire facility staff, ~~at least once per 12 months.~~ | R78
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety, ~~at least once per 6 months.~~
- d. The performance of activities required by the Nuclear Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, ~~at least once per 24 months.~~ | R182
- e. ~~The Site Radiological Emergency Plan and implementing procedures at least once per 12 months. (Deleted)~~
- f. ~~The Plant Physical Security Plan, the Safeguards Contingency Plan, and implementing procedures at least once per 12 months. (Deleted)~~
- g. Any other area of unit operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power.
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months. | R78
- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.



#### ADMINISTRATIVE CONTROLS

- k. The radiological environmental monitoring program and the results thereof, ~~at least once per 12 months.~~
- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures, ~~at least once per 24 months.~~
- m. The PROCESS CONTROL PROGRAM and implementing procedures for SOLIDIFICATION of radioactive wastes, ~~at least once per 24 months.~~
- n. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977 or Regulatory Guide 1.21, Rev. 1, 1974 and Regulatory Guide 4.1, Rev. 1, 1975, ~~at least once per 12 months.~~

R46

#### AUTHORITY

6.5.2.9 The NSRB shall report to and advise the Senior Vice President, Nuclear Power those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

R78

#### RECORDS

6.5.2.10 Records of NSRB activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Senior Vice President, Nuclear Power within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Senior Vice President, Nuclear Power and to the management positions responsible for the areas audited within 30 days after completion of the audit.

R78

R78

R78

#### 6.5.3 THIS SPECIFICATION IS DELETED

R182



- E. All nonroutine reports prior to submittal of the written report (described in Subsections 5.4.2.a, b, and c).
- F. Investigations of all reported instances of noncompliance with Environmental Technical Specifications, associated corrective actions, and measures taken to prevent recurrence.

#### 5.2.2 Audit

The licensee shall conduct an audit ~~once per 18 months~~ of the environmental monitoring program. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. Results of the audit activities shall be maintained and made available for inspection.

R111

#### 5.3 Changes in Station Design or Operation

Changes in station design or operation may be made subject to the following conditions:

- A. The licensee may (1) make changes in the station design and operation, and (2) conduct tests and experiments not described in this document without prior Commission approval, unless the proposed change, test or experiment involves a change in the objectives of the ETS and/or an unreviewed environmental question of significant impact.
- B. A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact

## ADMINISTRATIVE CONTROLS

### AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions, ~~at least once per 12 months.~~
- b. The performance, training and qualifications of the entire facility staff, ~~at least once per 12 months.~~ | R66
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems or method of operation that affect nuclear safety, ~~at least once per 6 months.~~
- d. The performance of activities required by the Nuclear Quality Assurance Program to meet the criteria of Appendix "B", 10 CFR 50, ~~at least once per 24 months.~~ | R169
- e. ~~The Site Radiological Emergency Plan and implementing procedures at least once per 12 months. (Deleted)~~
- f. ~~The Plant Physical Security Plan, the Safeguards Contingency Plan, and implementing procedures at least once per 12 months. (Deleted)~~
- g. Any other area of unit operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power. | R66
- h. The Facility Fire Protection Program and implementing procedures at least once per 24 months.
- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The radiological environmental monitoring program and the results thereof, ~~at least once per 12 months.~~
- l. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures, ~~at least once per 24 months.~~
- m. The PROCESS CONTROL PROGRAM and implementing procedures for SOLIDIFICATION of radioactive wastes, ~~at least once per 24 months.~~
- n. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977 or Regulatory Guide 1.21, Rev. 1, 1974 and Regulatory Guide 4.1, Rev. 1, 1975, ~~at least once per 12 months.~~ | R34

- E. All nonroutine reports prior to submittal of the written report (described in Subsections 5.4.2.a, b, and c).
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- B. A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact

ENCLOSURE 4

DISCUSSION AND  
SIGNIFICANT HAZARDS  
CONSIDERATION EVALUATION

SEQUOYAH NUCLEAR PLANT



## Discussion of Changes

### Introduction

Currently, the Administrative Controls section of the Standard Technical Specifications for Westinghouse plants (NUREG-1431, Vol. 1) states that the combination of reviews and audits should be integrated "into a cohesive program that provides senior management with an assessment of facility operation and recommends actions to improve nuclear safety and plant reliability." Therefore, these administrative tools should be sufficiently flexible to allow for senior management direction of resources to focus upon areas requiring increased attention. The proposed changes to the Technical Specification administrative controls would provide such flexibility through the elimination of certain rigid audit frequencies.

Additionally, references to reviews and audits of the site's Radiological Emergency Plan and Physical Security/Safeguard Contingency Plan (and of their associated implementing procedures) would be removed from the Technical Specifications because those requirements presently exist within the individual Plans. This action reflects the guidance provided in an NRC generic communication, Generic Letter 93-07 published December 28, 1993 and is similar to Virginia Power submittal of July 20, 1993.

### Background

The minimum scope and schedules for the audit program have been specified by the Administrative Controls section of the facility's Technical Specifications. The specific audits and their associated minimum frequencies have been developed and implemented to comply with requirements from various sources including the Code of Federal Regulations (Physical Security Program, Radiological Emergency Plan, Standard Technical Specifications, NRC Generic Letters, industry guidelines and standards (Conformance to Technical Specifications and Operating License, Effectiveness of Corrective Actions, and Training audits). The audits specified by these sources are meant to address programs which are deemed to be essential to the effective management of each nuclear facility. However, the rigid schedules dictated by the Technical Specifications do not allow management the flexibility to recognize good performance by

certain organizations, and resources which could be devoted to areas with perceived weaknesses are diluted by the requirement to audit strong programs at the frequencies set forth in the Technical Specifications. The proposed changes would allow for decreasing the frequencies of certain audits and maintaining the frequency of those audits presently scheduled biennially. The exceptions to this frequency extension would be those audits which have frequencies specifically delineated by the Code of Federal Regulations (i.e., Radiological Emergency Plan and Implementing Procedures Audit, Physical Security/Safeguards Contingency Plan and Implementing Procedures Audit) and audits associated with fire protection as defined by the present technical specifications.

On December 28, 1993, the NRC published Generic Letter 93-07 which provides guidance for relocating certain requirements (without reducing them) from the Technical Specifications to other NRC-approved program documents. The proposed generic communication specifically addresses the reviews and audits of the Radiological Emergency Plan and implementing procedures and the Physical Security/Safeguards Contingency Plan and implementing procedures. Currently, the requirements for these reviews and audits are incorporated into the Sequoyah Radiological Emergency and Physical Security/Safeguards Contingency Plans. The proposed changes would delete the redundant references in the facility's Technical Specifications to the requirements which originate in Title 10 of the Code of Federal Regulations [10 CFR 50.54(t) for Emergency Preparedness and 10 CFR 50.54(p), 10 CFR 73.40, 10 CFR 73.55, and 10 CFR 73.56 for Security].

#### Description Of Specific Changes

The proposed amendment would eliminate the references to specific frequencies for each of the Technical Specification required audits and eliminate reference to reviews and audits of the Radiological Emergency Plan and Physical Security/Contingency Plan. Instead, a statement would be added to the NQA Plan specifying that the audits listed in the Technical Specifications would be accomplished on a biennial (2 years) frequency as defined in the NQA Plan Section 12.2.E.2. The requirements for reviews and annual

audits of the site Radiological Emergency Plan and Physical Security/Contingency Plan (and their associated implementing procedures) are currently delineated within the NRC-approved Radiological Emergency Plan and Physical Security/Contingency Plan for Sequoyah Nuclear Plant as provided for in the NRC's generic communication. Each of the proposed changes to the Technical Specifications is discussed by line item below:

Sequoyah Nuclear Plant Unit 1 and Unit 2 Technical Specifications:

ADMINISTRATIVE CONTROL Section 6.5.2.8 has been revised to delete the references to specific audit frequencies. In accordance with the Standard Review Plan (SRP) Section 17.3 ("Quality Assurance Program Description") guidance on planned and periodic assessments scheduling and resource allocation, the following statement has been prepared for Section 12.2.E.2 ("Audits") of the NQA Plan (and is included in Enclosure 5):

Auditing organizations shall ensure that audit procedures and instructions adequately cover applicable elements of the Nuclear Quality Assurance Program. Audit subjects are specified in plant technical specifications and regulatory commitments. Audit frequencies shall be biennially, with the exception of fire protection related audits which shall be in accordance with the plant technical specifications. The audit frequencies for programs involving each site's Radiological Emergency Plan and Physical Security/Contingency Plan are as required by the Code of Federal Regulations.

Additionally, a proposal is being made in Enclosure 5 to modify alternative number 6 of NRC Regulatory Guide 1.33 in the NQA Plan. Specifically, audit frequencies, not associated with fire protection, will no longer be specified in plant specific technical specifications but specified as biennial (2 years) in Section 12.2.E.2 of the NQA Plan.

This change neither alters the function nor diminishes the quality of the Audit Program. The Nuclear Safety Review Board (NSRB) retains responsibility for oversight of the Quality Assurance Audit Program. The sole change to the process is associated with the audit frequencies. Specifically, audit frequencies are being specified generically in the NQA Plan.



The Technical Specification required audits and the impacts of the proposed changes are listed below:

- The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions.

Applicable portions of the Technical Specifications and license conditions are evaluated during special assessments and selected audits. This change will not adversely impact compliance with those provisions of the Technical Specifications, the commitments in the NQA Plan to ANSI N18.7-1976, or the effectiveness of audits performed. Compliance with the Technical Specifications and license conditions is evaluated by multiple Technical Specification audits.

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

Audits of the facility staff's qualifications ("Training Audits") are conducted annually. The proposed changes will allow management to schedule the time between specific audits to be a maximum of 24 months, as evaluated. This added versatility is not projected to adversely impact the effectiveness of either the Nuclear Training Program or the Audit Program, because management can increase or decrease the audit frequency based upon observed performance and importance to safety.

- The results of actions taken to correct deficiencies occurring in unit 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, and currently, an audit is performed every six months to evaluate the programmatic controls which govern the corrective action process as well as the overall correction of deficiencies. The proposed Technical Specification changes would not negatively affect the review of corrective actions in each audit. Only the biannual audit of programmatic controls will be affected in that management will be given flexibility to adjust the audit's frequency based upon performance as evidenced through trends and other



performance indicators. As such, the proposed changes will not diminish the effectiveness of either the Corrective Action Program or the oversight of that program.

- The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR 50.

This proposed change would not impact the performance of audits on these activities since the audits are currently being performed "at least once per 24 months." The proposed change does not alter this frequency.

- The Site Radiological Emergency Plan and implementing procedures.

The proposed changes would not impact those audits whose frequencies are mandated by Title 10 of the Code of Federal Regulations and the NRC-approved plans.

- The Plant Physical Security Plan, the Safeguards Contingency Plan and implementing procedures.

The proposed changes would not impact those audits whose frequencies are mandated by Title 10 of the Code of Federal Regulations and the NRC-approved plans.

- Any other area of facility operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power.

There is no impact upon this Technical Specification line item.

- The radiological environmental monitoring program and the results thereof.

This audit is currently performed once every 12 months. The proposed changes would allow the time between audits to be adjusted based upon the radiological environmental monitoring program's performance to a maximum of 24 months, as evaluated. The program's performance is and will continue to be assessed through self assessments, management reviews, QA assessments and audits, and other trend indicators. This flexibility is consistent with guidance provided by the NRC relative to the implementation of the revised 10 CFR 20.1101(c) (i.e.,

refer to NRC response to NUMARC for question 118 in third set of Questions and Answers which indicates that an integrated program of sampling, inspections, internal reviews, independent reviews, and QA audits could be used to assess the effectiveness of the radiological protection program).

- The Offsite Dose Calculation Manual (ODCM) and implementing procedures.

This proposed change would not impact the performance of audits on these activities since the audits are currently being performed "at least once per 24 months." The proposed change does not alter this frequency.

The program's performance is and will continue to be assessed through self assessments, management reviews, QA assessments and audits, and other trend indicators. Also, the added versatility in the audit program will continue to be consistent with guidance provided by the NRC relative to the implementation of the revised 10 CFR 20.1101(c) (i.e., refer to NRC response to NUMARC (NEI) for question 118 in third set of Questions and Answers which indicates that an integrated program of sampling, inspections, internal reviews, independent reviews, and QA audits could be used to assess the effectiveness of the radiological protection program).

- The Process Control Program (PCP) and implementing procedures for solidification of radioactive wastes.

This proposed change would not impact the performance of audits on these activities since these audits are currently being performed "at least once per 24 months." The proposed change does not alter this frequency.

The program's performance is and will continue to be assessed through self assessments, management reviews, QA assessments and audits, and other trend indicators. Also, the added versatility in the audit program will continue to be consistent with guidance provided by the NRC relative to the implementation of the revised 10 CFR 20.1101(c) (i.e., refer to NRC response to NUMARC (NEI) for question 118 in third set of Questions and Answers which indicates that an integrated program of sampling, inspections, internal reviews, independent reviews, and QA audits could be used to assess the effectiveness of the radiological protection program).

- The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December 1977 or Regulatory Guide 1.21, Rev 1, 1974 and Regulatory Guide 4.1, Rev. 1, 1975.

This audit is currently performed once every 12 months. The proposed change would allow the time between audits to be adjusted based upon the performance of the implementation of the Quality Assurance Program to a maximum of 24 months, as evaluated. The program's performance is, and will continue to be assessed through self-assessments and audits, and other trend indicators.

- The performance of activities required for environmental monitoring.

This audit is currently performed once per 18 months. The proposed changes will allow management to schedule the time between specific audits to be a maximum of 24 months, as evaluated. This added flexibility will not adversely affect the performance of activities required by the Quality Assurance Program for effluent and environmental monitoring or the audit program. Under the proposed changes, management will be permitted to increase or decrease the audit frequency based upon observed performance.

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 such, we believe these changes are correct and acceptable.

Specific line item changes involving the audit process include:

ADMINISTRATIVE CONTROLS 6.5.2.8.a, 6.5.2.8.b, 6.5.2.8.k, and 6.5.2.8.n have been revised to delete the phrase "at least once per 12 months."

ADMINISTRATIVE CONTROL 6.5.2.8.c has been revised to delete the phrase "at least once per 6 months."

ADMINISTRATIVE CONTROLS 6.5.2.8.d, 6.5.2.8.i, and 6.5.2.8.m have been revised to delete the phrase "at least once per 24 months."



ADMINISTRATIVE CONTROLS 6.5.2.8.e and 6.5.2.8.f have been deleted. The requirements for these audits (Radiological Emergency Plan, Physical Security and Safeguards Contingency Plan) are specified within the Sequoyah Radiological Emergency Plan and Sequoyah Physical Security/Safeguards Contingency Plan.

Appendix B Environmental Technical Specification 5.2.2 has been revised to delete the phrase "once per 18 months."

An additional editorial line item change for the Unit 1 Technical Specifications on page 6-12 is as follows:

AUTHORITY 6.5.2.9 has been revised to read " The NSRB shall report to and advise the Senior Vice President, Nuclear Power of those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8."

#### Environmental Impact Evaluation

The proposed change request does not involve an unreviewed environmental question because operation of SQN units 1 and 2 in accordance with this change would not:

1. Result in a significant increase in any adverse environmental impact previously evaluated in the Final Environmental Statement (FES) as modified by the staff's testimony to the Atomic Safety and Licensing Boards, supplements to the FES, environmental impact appraisals, or decisions of the Atomic Safety and Licensing Board.
2. Result in a significant change in effluents or power levels.
3. Result in matters not previously reviewed in the licensing basis for SQN that may have a significant environmental impact.



### Significant Hazards Consideration

The standards used to arrive at a determination that a Technical Specification change request involves no significant hazards consideration are included in the Commission's regulations, 10 CFR 50.92, which states that no significant hazards considerations are involved if the operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is addressed as follows:

1. **Operation of the facility in accordance with the proposed technical specifications would not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The likelihood that an accident will occur is neither increased or decreased by this Technical Specification change which only affects review and audit frequencies. This Technical Specification change will not impact the function or method of operation of plant equipment. Thus, there is not a significant increase in the probability of a previously analyzed accident due to this change. No systems, equipment, or components are affected by the proposed changes. Thus, the consequences of a malfunction of equipment important to safety previously evaluated in the FSAR are not increased by this change.

The proposed change only affects review and audit frequencies. As such, the proposed change has no impact on accident initiators or plant equipment, and thus, does not affect the probabilities or consequences of an accident.

Therefore, we conclude that this change does not significantly increase the probabilities or consequences of an accident.

2. Operation of the facility in accordance with the proposed technical specifications would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not involve changes to the physical plant or operations. Since program audits do not contribute to accident initiation, a change related to audit functions cannot produce a new accident scenario or produce a new type of equipment malfunction. Also, this change does not alter any existing accident scenarios. The proposed change does not affect equipment or its operation, and, thus, does not create the possibility of a new or different kind of accident. Therefore, the proposed change does not create the possibility of a new or different kind of accident.

3. Operation of the facility in accordance with the proposed technical specifications would not involve a significant reduction in a margin of safety.

The proposed change concerning conduct of reviews and audits does not directly affect plant equipment or operation. Safety limits and limiting safety system settings are not affected by this proposed change.

Therefore, use of the proposed Technical Specification would not involve any reduction in the margin of safety.

Based on the above, we have determined that the Technical Specification change request does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. Therefore, this Technical Specification change request does not involve a significant hazards consideration.

ENCLOSURE 5

PROPOSED NUCLEAR QUALITY ASSURANCE PLAN  
CHANGES AND JUSTIFICATION

## 12.2 Program Elements

- A. An audit plan shall be prepared identifying the audits to be performed and their frequencies and schedule.
- B. Audits shall include: a determination of the effectiveness of QA program elements; evaluation of work areas, activities, processes, and items; review of documents and records; review of audit results with responsible management; and follow-up on corrective action taken for deviations identified during the audit.
- C. Audits shall be performed in accordance with written procedures or checklists by qualified, certified, and appropriately trained personnel not having direct responsibilities in the areas being audited.
- D. Audited organizations shall provide access to facilities, documents, and personnel needed to perform the audits. They shall take necessary action to correct deviations identified by the audit in a timely manner.
- E. Internal Audits
  - 1. The scope of an audit shall be determined by considering such factors as work areas, activities, processes, or items and the specific organizations involved.
  - 2. Auditing organizations shall ensure that audit procedures and instructions adequately cover applicable elements of the NQAP. Audit subjects are specified in plant technical specifications and regulatory commitments. Audit frequencies shall be biennially with the exception of fire protection related audits which shall be in accordance with the plant technical specifications. The audit frequencies for programs involving each site Radiological Emergency Plan and Physical Security/Contingency Plan are as required by the Code of Federal Regulations.
- F. Contractor/Supplier Audits
  - 1. Audits of selected suppliers shall be conducted to verify implementation and adequacy of specified QA requirements.
  - 2. Contractors/suppliers to be audited shall be selected on the basis of the importance of their products or services to safety, status of contract activity, historical performance of the supplier, and potential QA problems that may be discovered during source surveillance inspection activities or earlier audits.
  - 3. Audit schedules shall be prepared and audits shall be conducted in accordance with the schedules.
  - 4. Audit reports shall be prepared and reviewed by the audit team, approved by management, and transmitted to the supplier and appropriate management within TVA.



## APPENDIX B

Page 11 of 20

## Table 2

## REGULATORY GUIDE CONFORMANCE STATUS

- b. For facilities holding a construction permit where system(s) and/or components have been released to the operations organization, temporary changes to procedures, as described above, shall as a minimum be approved by two members of the plant management staff, at least one of whom shall be a designated member of the plant operations management staff.
3. Section 5.2.13.1 - The statement that changes made to procurement documents be subject to the same degree of control as was used in the preparation of the original documents is applied consistent with the requirements of ANSI N45.2.11, paragraph 7.2. Minor changes to documents, such as inconsequential editorial corrections or changes to commercial terms and conditions, may not require that the revised document receive the same review and approval as the original documents.
4. Section 5.2.15 - The guidelines of this section are accepted with the following alternatives:
- a. Minor changes to documents are processed as delineated in Section 6.1.2.F3 of this plan.
- b. TVA has programmatic controls in place that make a biennial review process unnecessarily duplicative. These programmatic controls ensure procedures are periodically reviewed and maintained current when pertinent source material is revised; the plant design changes; and/or any deficiencies occur. TVA has determined that this approach better addresses the purpose of the biennial review process and that, from a technical and practical standpoint, is better suited to ensure the validity of operational phase site procedures and instructions.
5. Section 5.2.17 - The statement that deviations, their cause, and any corrective action completed or planned shall be documented will apply to significant deviations. Other identified deviations will be documented and corrected. This interpretation is consistent with Appendix B to 10 CFR 50, Criterion XVI, "Corrective Action."
6. TVA will comply with regulatory position C.4 except that audit frequencies are as specified in NQA Plan Section 12.2.E.2.

NRC Regulatory Guide 1.37 - "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants," 3/73, endorses ANSI N45.2.1-1973.

TENNESSEE VALLEY AUTHORITY  
NUCLEAR QUALITY ASSURANCE PLAN (TVA-NQA-PLN89-A), REVISION 4  
DESCRIPTION OF CHANGES AND THEIR JUSTIFICATION

<u>SECTION NO. IN REV. 4</u> (12/15/93)	<u>PROPOSED CHANGES</u> <u>TO REVISION 4</u>	<u>JUSTIFICATION</u>
12.2.E.2 (page 65)	Section revised to specify that audit subjects are described in plant technical specifications and regulatory commitments. In addition, this section was revised to show the audit frequency for internal audits.	TVA Nuclear's plant technical specifications are being revised to remove audit frequencies. These frequencies are being moved to the NQA Plan and are being changed to biennially for most audits. The proposed change to audit frequencies will provide added flexibility in scheduling audits and allow management to redirect resources from programs with identified strengths to areas with perceived weaknesses. Specific justifications are also provided in the technical specification change justification portion of this package.
Appendix B, Table 2, Section NRC Reg. Guide 1.33, item 6 (page 88).	Revised to reference new location of audit frequencies.	Reference above justification.

ENCLOSURE 6

PROPOSED TECHNICAL  
SPECIFICATION CHANGES  
(REVISED PAGES)

BROWNS FERRY NUCLEAR PLANT

LIST OF AFFECTED PAGES

UNIT 1

6.0-14

6.0-15

UNIT 2

6.0-14

6.0-15

UNIT 3

6.0-14

6.0-15

## AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of plant operation to provisions contained within the Technical Specifications and applicable license conditions. -|
- b. The performance, training and qualifications of the entire plant staff. -|
- c. The results of actions taken to correct deficiencies occurring in site equipment, structures, systems or method of operation that affect nuclear safety. -|
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50. -|
- e. (Deleted) -|
- f. (Deleted) -|
- g. Any other area of site operation considered appropriate by the NSRB or the Senior Vice President, Nuclear Power.
- h. The fire protection programmatic controls including the implementing procedures at least once per 24 months.



- i. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite license personnel or an outside fire protection firm.
- j. An inspection and audit of the fire protection and loss prevention program shall be performed by an outside qualified fire consultant at intervals no greater than 3 years.
- k. The Radiological Environmental Monitoring program and the results thereof. †
- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975. †
- m. (Deleted) †
- n. The Offsite Dose Calculation Manual and implementing procedures. †
- o. The Process Control Program and implementing procedures for solidification of wet radioactive wastes. †
- p. (Deleted)

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- c. The results of actions taken to correct deficiencies occurring in site equipment, structures, systems or method of operation that affect nuclear safety. †
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- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975. +
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- l. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 4.15, December 1977, or Regulatory Guide 1.21, Rev. 1, 1974, and Regulatory Guide 4.1, 1975. +
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