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QA

August 2, 1991

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
Quality Assurance Program

Gentlemen:

This letter constitutes a request for change to the Waterford 3 S.E.S. Quality Assurance Program as described in our updated (December 18, 1990) Final Safety Analysis Report, Chapter 17, Table 17.2.1 Item (4). Currently the UFSAR, by endorsing Regulatory Guide 1.33 Revision 2, 1978, refers to ANSI N18.7 which requires the biennial review of Plant Procedures. We hereby request an exception to the biennial review commitment based on the justification attached.

The proposed change establishes an alternative method of maintaining procedures current in accordance with 10CFR50, Appendix B, in lieu of biennial reviews imposed by ANSI N18.7, Section 5.2.15, and stipulated in Waterford 3 S.E.S. Administrative Plant Procedure UNT-001-003.

The alternative method implements a dynamic process for assessing procedural adequacy by initiating procedure review, change or revision, based on new or revised source material potentially affecting the intent of procedures. The change is considered necessary to promote the quality of procedure review and revision controls through the effective use of resources and does not consider age as a requirement for procedure review.

The proposed change includes an additional commitment to perform a biennial Quality Assurance audit using a representative sampling process. This audit will provide verification that the inputs/feedbacks outlined in the enclosed justification are in compliance with existing programmatic controls used to maintain procedures current.

Attachment 1 contains the proposed change to the UFSAR. Attachment 2 contains the justification for change.

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While initially the change may appear to be a lessening of commitment, the attached justification supports the alternative method of maintaining procedures current, as equivalent to or better than that prescribed by ANSI N18.7-1976. We will assume that this proposed change is acceptable 60 days from the date of this letter unless informed otherwise as provided by 10CFR 50.54.a.3(iv). UNT-001-003 will be revised immediately thereafter and the change will be incorporated into the UFSAR by our normal UFSAR submittal.

If you have any questions concerning this information, please contact P.L. Carepino at (504) 739-6692.

Very truly yours,



RFB/PLC/ssf

Attachments

cc:

R.D. Martin, NRC Region IV
D.L. Wigginton, NRC-NRR
R.B. McGehee
N.S. Reynolds
NRC Resident Inspectors Office

Attachment 1
Affected FSAR Page

WSES-FSAR-UNIT-3

Table 17.2-1 (Sheet 5 of 9)

<u>Document</u>	<u>Comment</u>
4. Regulatory Guide 1.33, Rev. 2, February 1978 (continued . .)	7. ANSI N18.7, Section 5.2.15 states, [Plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years.] Waterford 3 has programmatic control requirements in place that initiate procedure reviews upon identification of new or revised source material that has a potential to affect the intent of the procedure. A biennial audit is performed by the Quality Assurance Department to verify compliance with existing programmatic controls used to maintain procedures current.

Attachment 2
Justification for Change

JUSTIFICATION FOR PROPOSED CHANGE

ANSI N18.7, Section 5.2.15, prescribes the requirement to perform biennial review of plant procedures. The intent is to ensure that existing procedures are periodically reviewed and revised as necessary to address the following elements which many have changed or come into existence.

1. Technical information
2. Industry experience
3. Plant behavior
4. Feedback based on use

Programmatic controls have been effected at Waterford 3 which are equivalent to or more effective in meeting this requirement from a technical and practical standpoint than the static biennial review process. These controls assess the procedural impact of the above listed elements and other elements prescribed by ANSI N18.7, utilizing a dynamic process, and account for the identification of the vast majority of revisions/changes to our procedures. Performing biennial reviews in addition to these controls is considered an overall weakness in our program by allowing for the postponement of required action and imposing a significant drain on plant resources without a commensurate improvement in plant safety.

Therefore, Waterford 3 proposes that the static biennial review commitment be replaced with an alternative commitment to review procedures upon identification of new or revised source material potentially affecting the intent of the procedure. Similar changes have been approved by the NRC for Virgil C. Summer Nuclear Station and Donald C. Cook Nuclear Plants, Units 1 and 2.

It is our belief that the dynamic process is necessary to maintain procedures in an accurate and useful condition and is more responsive than the static biennial review process specified by ANSI N18.7.

Listed below are procedurally controlled mechanisms that have been established at Waterford 3 which assess procedural impact and determine the need for review or revision.

1) Plant Design/Modification Program

The plant design/modification program requires an interface review of all modifications by groups which are potentially affected by the modification. This interface review requires that all procedures potentially affected by the modification be identified and changes or revisions made prior to closure of the modification package.

In addition, when a significant design change is necessary because of an incorrect design, the design process and verification procedures are reviewed and modified as necessary.

2) Corrective Action Program

It is the responsibility of all Waterford 3 personnel to identify and document conditions adverse to quality, industrial safety, and plant reliability. The corrective action program includes Quality Notices (QN's), Security Incident Reports (SIR's), Potential Reportable Events (PRE's), Licensee Event Reports (LER's), Significant Occurrence Reports (SOR's), NRC Inspection Reports (IR's), Nonconformance Condition Identifications (NCI's), and Outside Agency Reports.

Corrective action for all the above listed items requires root cause identification. Should inadequate procedures be identified, they are promptly changed or revised.

3) Off-Normal Occurrence

Root cause investigation threshold criteria has been established to further investigation event which occur at the station and are considered to be outside of normal expected operation including severe or unusual plant transients, safety system malfunction or improper operation, major equipment damage, events involving nuclear safety or plant reliability, deficiencies in design, analysis, operation, maintenance procedures or training that cause a significant event, fuel handling or storage events, excessive radiation exposure or severe personnel injury, and excessive discharge of radioactivity. Corrective action for these events requires appropriate procedures to be reviewed and necessary changes or revisions performed.

4) User Feedback and Procedure Compliance

All Waterford 3 personnel are required to notify supervision or management when procedural guidance cannot or should not be followed. The procedure is then evaluated, and if required changed prior to the commencement of work. Individuals assigned to a task are required to review the procedure in its entirety prior to starting work.

Plant Operation Advisory Groups in the areas of Administrative Services, Security, Technical Services, Operations, and Maintenance have been established and are responsible for routinely identifying, reviewing and evaluating concerns or areas that need improvement or enhancement. In addition these groups provide the vehicle to receive feedback from the work force for improvements in all areas. The above listed activities may result in formal recommendations to review or change procedures.

5) Operating Experience Review

Waterford 3 is an active participant in the Significant Event Evaluation and Information Network (SEE-IN) Program. Operations Assessment and Information Dissemination Group (QA&ID) provides the necessary instructions for evaluating material from the SEE-IN program [e.g., Significant Event Reports (SER's), Significant Operating Experience Reports (SOER's), Operations and Maintenance Reminders (O&MR's), Combustion Engineering Information Bulletins (CEIB's)] and for disseminating such information to plant personnel. This evaluation includes the review of applicable procedures. Recommendations are made to resolve underlying problems and implementation may include changes to plant procedures. Internal and external effectiveness reviews are performed to ensure the program is maintained.

Administrative procedures governing the Vendor Equipment Technical Information Program (VETIP) provide control of incoming equipment technical information (ETI) whether it arrives directly from the vendor or from other industry or regulatory sources (i.e., Nuclear Network, NPRDS, SEE-IN, NRC Bulletins, etc.) so it receives the appropriate engineering/technical review evaluation, and distribution for the following:

- prompt warnings to key personnel
- timely incorporation into maintenance or operating procedures, equipment data/purchasing records and training programs
- future procedure review and revision cycles

6) Licensed Document Change/50.59 Evaluation

Changes to licensing documents such as the Technical Specifications and FSAR require an evaluation for impact on procedures and may result in procedure changes as required.

All proposed changes to the facility or procedures and any new tests or experiments that have a potential to affect, either directly or indirectly, nuclear safety are reviewed for impact on procedures.

7) Commitments Management System (CMS)

The CMS program at Waterford 3 is a comprehensive system, governed by administrative controls, utilized to insure that commitments/requirements and recommendations/good practices are tracked, included, and maintained in appropriate implementing procedures. Correspondence to and from regulatory agencies (e.g., Generic Letters, NRC Information Notices, NRC Information Bulletins, Security Incident Reports, NRC Inspection Reports, Reports to the NRC,

Federal Register, Environmental Protection Agency and Waterford 3 responses to the forgoing) is reviewed for inclusion in the CMS system. Action items concerning procedures are tracked until the procedure is revised or changed.

Passive commitments (on-going requirements) are tied to the procedures which implement the stated requirement. Passive commitments are primarily those requirements which are required to be addressed by procedure. Passive commitments are extracted from source documents including the generic correspondence listed above, CFR, licensing documents (i.e., Technical Specifications, Emergency Plan, Security Plan, FSAR, and all endorsements to documents therein). Any change to source criteria is updated and evaluated against the implementing procedures. The need for change or revision is then formally transmitted to the appropriate department/group.

8) Plant Trending Program

Events Analysis and Reporting, Operations, Maintenance, Plant Engineering, Radiation Protection, Fire Protection, and Plant System Engineering are groups which currently implement trending programs. The trending process includes the collection of trend data which is indicative of equipment and personnel performance, evaluation of that data, and identification of follow-up actions necessary to improve equipment and/or personnel performance. Trending follow-up action for adverse trends may result in procedure changes and improvements.

9) Operator Requalification Training

Licensed operator training, a documented training program makes frequent use of procedures. Resolution of noted discrepancies would result in procedure revisions.

10) Quality Assurance/ISEG

The Quality Assurance Program includes a review of procedures as part of its audit and surveillance process which is based on a two year cycle.

The Independent Safety Engineering Group conducts reviews, surveillance and assessments of plant operating and maintenance activities in order to develop and present recommendations to management for resolution (e.g., revised procedures, equipment modification, maintenance activities, operating activities or any other means of improving safety).

11) Security/Emergency Planning

The security program and its implementing procedures are currently reviewed annually in accordance with 10CFR 73.40 and 10CFR 73.55. The emergency preparedness program and its implementing procedures are reviewed annually in accordance with the Emergency Plan. These periodic reviews are not affected by the proposed UFSAR change and will be continued.

In addition, Waterford 3 commits to perform a biennial Quality Assurance audit to provide verification that the existing programs and activities listed above are in compliance therefore, maintaining procedures current. This audit will provide additional strength by ensuring the input/feedback is being addressed vs. ensuring that a document reflects a revision date within a specified time frame.

CONCLUSION

Our Quality Assurance Program in conformance with ANSI N18.7-1976, requires that plant procedures be reviewed no less frequently than every two years. As discussed, we have established additional procedurally controlled mechanisms that contain their own revision control elements when affected by changes in source material. We believe that these additional controls coupled with a biennial Quality Assurance audit of the programs and activities used to maintain our procedures current, provides equivalent or better compliance with the intent of ANSI N18.7-1976. We further believe that the minor changes to our administrative controls necessary to implement the proposed change will enhance both the technical and practical aspects of our procedure review/revision control process by adequately addressing an identified need or concern in a timely fashion.