



U.S. NUCLEAR REGULATORY COMMISSION
STANDARD REVIEW PLAN
OFFICE OF NUCLEAR REACTOR REGULATION

SECTION 13.4

REVIEW AND AUDIT

REVIEW RESPONSIBILITIES

Primary - Quality Assurance Branch (QAB)

Secondary - None

I. AREAS OF REVIEW

QAB reviews and evaluates the applicant's plan for conducting reviews and audits of operating phase activities that are important to safety, as described in the applicant's preliminary safety analysis report (PSAR) or final safety analysis report (FSAR). The primary focus of attention should be on the procedures that will be used to implement the licensee's responsibility pursuant to 10 CFR §50.59 relating to proposed changes, tests, and experiments, and on the procedures for after-the-fact review evaluation of unplanned events, such as abnormal occurrences. At the PSAR review stage, the applicant's commitment to follow the recommendations of Regulatory Guide 1.33 is examined. At the FSAR stage, the applicant's proposed implementation plan for conducting reviews and audits is evaluated. Procedures for both onsite offsite (independent) review should be described, as follows:

1. Qualified members of the onsite operating organization and persons independent of the onsite organization should participate in the review of safety-related operating activities. The PSAR should provide a clear commitment for the applicant to meet Section 4 of ANSI N18.7-1972.
2. Qualified members of the onsite operating organization are expected to participate in the review of operating activities to assist the plant manager either as part of their individual job responsibilities or as members of a functional review group. The FSAR should describe how the onsite organization functions with respect to review of proposed changes to systems or procedures, tests, and experiments, and of unplanned events that have operational safety significance.
3. The FSAR should provide a detailed description of the procedure and organization employed to examine safety-related operating activities independent of the operating organization. The information should be sufficient to describe how and when such a program is to be implemented, relative to fuel loading of the first unit.

USNRC STANDARD REVIEW PLAN

Standard review plans are prepared for the guidance of the Office of Nuclear Reactor Regulation staff responsible for the review of applications to construct and operate nuclear power plants. These documents are made available to the public as part of the Commission's policy to inform the nuclear industry and the general public of regulatory procedures and policies. Standard review plans are not substitutes for regulatory guides or the Commission's regulations and compliance with them is not required. The standard review plan sections are keyed to Revision 2 of the Standard Format and Content of Safety Analysis Reports for Nuclear Power Plants. Not all sections of the Standard Format have a corresponding review plan.

Published standard review plans will be revised periodically, as appropriate, to accommodate comments and to reflect new information and experience.

Comments and suggestions for improvement will be considered and should be sent to the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Washington, D.C. 20545.

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II. ACCEPTANCE CRITERIA

The staff position applicable to this section of the FSAR is the set of requirements and recommendations found in ANSI N18.7-1972 at Sections 4.1-4.5, as endorsed by Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)."

III. REVIEW PROCEDURES

Selection and emphasis of various aspects of the areas covered by this review plan will be made by the reviewer on each case. The judgment on the areas to be given attention during the review is to be based on an inspection of the material presented, the similarity of the material to that recently reviewed on other plants, and whether items of special safety significance are involved.

The review of this section of the PSAR consists of determining that the applicant has committed to meeting the acceptance criteria of II, above.

The review of this section of the FSAR consists of an analysis of the information submitted by detailed comparison with the acceptance criteria of II, above. When the reviewer has determined that the requirements and recommendations of the referenced sections of the standard have been implemented in the applicant's plans for conducting reviews and audits, the review of this section of the SAR is complete.

IV. EVALUATION FINDINGS

The reviewer verifies that the information presented and his review support conclusions of the following type, to be used in the staff's safety evaluation report:

"The applicant's program for review and audit of plant operations is in conformance with staff positions described in Regulatory Guide 1.33 and applicable industry standards (ANSI N18.7-1972), and is acceptable. The major features of the review and audit program will be incorporated in the administrative controls section of the plant technical specifications."

The evaluation finding for this section should also include the following:

1. A brief description of the two-level review process.
2. A statement of the applicant's commitment to perform independent reviews and audits in accordance with a written charter.

V. REFERENCES

1. Regulatory Guide 1.33, "Quality Assurance Program Requirements (Operation)."
2. ANSI N18.7-1972, "Standard for Administrative Controls for Nuclear Power Plants," American National Standards Institute (1972).
3. 10 CFR §50.59, "Authorization of Changes, Tests, and Experiments."

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