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

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Change in Quality Assurance Program--Biennial Procedure Review
San Onofre Nuclear Generating Station
Units 2 and 3

This letter requests NRC approval of a change to the Quality Assurance (QA) Program as described in the San Onofre Nuclear Generating Station (SONGS) Updated Final Safety Analysis Report (UFSAR) and QA Topical Report. Currently, the UFSAR and QA Topical Report, by reference to ANSI N18.7, require biennial review of plant procedures. The Enclosure provides the justification for the proposed change to eliminate biennial review by taking credit for other existing processes which render the biennial review redundant and unproductive.

Southern California Edison has determined that this change does not involve a reduction in a commitment. In accordance with 10 CFR 50.54(a)(3)(iv), the change outlined in the Enclosure will be effective immediately upon NRC approval of this letter or within 60 days after the submittal date of this letter, whichever occurs first. Applicable changes to the UFSAR and the Topical QA Manual will be made at a later date in accordance with our regular revision program. The administrative procedure which governs biennial review, SO123-VI-1.0.2, "Annual/Biennial Review of Orders, Procedures and Instructions," will be revised after NRC approval of this letter or after 60 days following the submittal date of this letter, whichever occurs first.

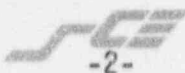
This change frees plant resources from the performance of redundant and unnecessary procedure reviews, thus allowing for a concentration of available resources on more safety significant issues. This change also results in a cost savings greater than \$100,000. Therefore, this change is being submitted as a Cost Beneficial Licensing Action.

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If you have any questions regarding this change, please contact me.

Sincerely,

Walter C. Marshall

cc: L. J. Callan, Regional Administrator, NRC Region IV
J. E. Dyer, Director, Division of Reactor Projects, Region IV
K. E. Perkins, Jr., Director, Walnut Creek Field Office, NRC Region IV
J. A. Sloan, NRC Senior Resident Inspector, San Onofre Units 2 & 3
M. B. Fields, NRC Project Manager, San Onofre Units 2 and 3

JUSTIFICATION FOR
DELETION OF BIENNIAL PROCEDURE REVIEW

1. INTRODUCTION/SUMMARY:

ANSI N18.7-1976 recommends that all safety-related procedures be reviewed no less frequently than every two years. Edison is committed to ANSI N18.7 through acceptance of the recommendations of Regulatory Guide 1.33 which endorses the ANSI Standard.

ANSI N18.7-1976 permits modification of the biennial review requirement based on such attributes as operational maturity of the plant, type and complexity of the activity involved, and establishment of a program which provides a systematic review and feedback of information based on procedure usage. Through the years of operation at San Onofre, numerous processes have been established which ensure that procedures are current and accurately reflect the plant design and regulatory requirements. These processes, which are detailed below, eliminate the need for biennial review of routine procedures.

2. BACKGROUND:

2.1 Technical Specifications

The San Onofre Units 2 and 3 Technical Specifications Section 6.0, Administrative Controls, Section 6.8.2, Procedures and Programs, states:

"Each procedure of 6.8.1 above, and changes thereto, shall be approved by the Station Manager; or by (1) the Deputy Station Manager, (2) the Manager, Operations, (3) the Manager, Maintenance, (4) the Manager, Technical, or (5) the Manager, Health Physics as previously designated by the Station Manager; prior to implementation and shall be reviewed periodically as set forth in administrative procedures."

2.2 San Onofre Updated Final Safety Analysis Report

The San Onofre Units 2 and 3 Updated Final Safety Analysis Report, Section 3A.1.33, Regulatory Guide (RG) 1.33, Quality Assurance Program Requirements, states:

"San Onofre Units 2 and 3 are consistent with the recommendations of Regulatory Guide 1.33. The Quality Assurance Program provisions to be applied to safety-related and fire protection program items are described in section 17.2. Nonsafety-related items which are considered important to safety are operated, controlled, inspected, and tested by qualified personnel in accordance with Technical Specification requirements. Radiation protection program controls are discussed in paragraph 12.1.1.2. The above programs are subject to independent audits, surveillance, and inspections by the

SCE Quality Assurance Organization to assure implementation of program requirements."

2.3 San Onofre Quality Assurance Topical Report

The San Onofre Quality Assurance Topical Report, Table 17.2-1, "SCE Quality Assurance Program Compliance to Guides, Requirements, and Standards," states San Onofre's compliance with Regulatory Guide 1.33, Revision 2. In the remarks section of the same table entry the Topical Report states that Regulatory Guide 1.33 endorses ANSI N18.7.

2.4 American National Standards Institute (ANSI) N18.7-1976

ANSI N18.7-1976, Section 5.2.15, "Review, Approval and Control of Procedures, " states:

"Each procedure shall be reviewed prior to initial use. The frequency of subsequent reviews shall be specified and may vary depending on the type and complexity of the activity involved, and may vary with time as a given plant reaches operational maturity. Applicable procedures shall be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction. Applicable procedures shall be reviewed following any modification to a system.

"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. A revision of a procedure constitutes a procedure review."

2.5 Code of Federal Regulations

10 CFR 50.54(a)(3), "Conditions of licenses," states:

"After March 11, 1983, each licensee described in paragraph (a)(1) of this section may make a change to a previously accepted quality assurance program description included or referenced in the Safety Analysis Report, provided the change does not reduce the commitments in the program description previously accepted by the NRC. Changes to the quality assurance program description that do not reduce the commitments must be submitted to the NRC in accordance with the requirements of Sec. 50.71(e)."

10 CFR 50.54(a)(3)(iv) further adds:

"Changes to the quality assurance program description included or referenced in the Safety Analysis Report shall be regarded as accepted by the Commission upon receipt of a letter to this effect from the appropriate

reviewing office of the Commission or 60 days after submittal to the Commission, whichever occurs first."

2.6 NRC Guidance

In a memorandum from Charles E. Rossi (NRC) to Directors of the Division of Reactor Safety for Regions I, II, III, IV, and V; dated December 21, 1992; Subject: Biennial Procedure Reviews, the NRC provided the following guidance on elimination of biennial procedure reviews:

- (1) Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system, as specified by Section 5.2 of ANSI N18.7/ANS 3.2 which is endorsed by RG 1.33.
- (2) Non-routine procedures (procedures such as emergency operating procedures, off-normal procedures, procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event) should be reviewed at least every two years and revised as appropriate.
- (3) At least every two years, the Quality Assurance (or other "independent") organization should audit a representative sample of the routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.
- (4) Routine plant procedures that have not been used for two years should be reviewed before use to determine if changes are necessary or desirable.

3. DISCUSSION:

To ensure that nuclear plant procedures are accurate and current, ANSI N18.7-1976 recommends that all safety-related procedures be reviewed "no less frequently than every two years" (paragraph 5.2.15, subparagraph 4) by an individual knowledgeable in the area affected by each procedure. However, the ANSI N18.7-1976 permits modification of this requirement based on such attributes as operational maturity of the plant, type and complexity of the activity involved, and establishment of a program which provides a systematic review and feedback of information based on procedure usage. Edison is committed to ANSI N18.7 through acceptance of the recommendations of Regulatory Guide 1.33 which endorses the ANSI Standard.

3.1 Processes Which Perform the Same Function as Biennial Review

Through the years of operation at San Onofre, numerous processes have been established which ensure that procedures are current and accurately reflect the plant design and regulatory requirements. These processes involve significant levels of review from various sources and numerous checks and balances to ensure adequacy and accuracy of the procedures. The processes utilize a dynamic "hands on" approach using real issues (addressed in a timely manner) as opposed to the more static biennial procedure review process. Examples of these processes include, but are not limited to, the following:

- (1) The configuration control process requires a review of all proposed design modifications by groups which are potentially affected by the proposed modification. This review requires that all procedures potentially affected be identified and reviewed and all required changes or revisions be made to the appropriate procedures in conjunction with the implementation of the design modification.
- (2) The non-conformance report process requires a disposition by engineering. This process includes consideration of procedural changes as a result of the disposition of the nonconformance and implementation where appropriate.
- (3) The Root Cause Program (RCP) requires the performance of root cause evaluations of hardware, programmatic, and human performance errors. This program entails the use of hindsight to identify errors and the sources of these errors. Use of this self-critical approach in a thorough and planned manner ensures the most comprehensive analysis possible for identifying "lessons learned" to serve as a basis for improving future performance to the highest attainable level. The RCP also entails the identification of potential procedure revisions and changes required to address the identified root causes of previous errors.
- (4) The San Onofre Independent Safety Engineering Group (ISEG) reviews NRC Bulletins, Information Notices, Significant Event Reports, and Significant Operating Event Reports, as well as 10 CFR 21 reports/issues and Combustion Engineering Technical Bulletins for applicability to San Onofre to determine whether any actions are required to address the specific situation. As part of this review, applicable procedures are evaluated for their accuracy and appropriateness, and any findings are provided to cognizant management which prompts any required procedural changes.
- (5) Amendments to the San Onofre Technical Specifications require the performance of procedure impact assessments to determine the impact of the change on existing procedures. Affected procedures are changed where appropriate.
- (6) Determination of corrective actions required to address and respond to NRC Notices of Violation, Generic Letters, and other regulatory concerns include a review of applicable

procedures and the delineation of any proposed changes necessary to implement the established corrective action.

- (7) A Procedure Modification Permit (PMP) is used by on-shift operators to facilitate the use of existing plant procedures for plant conditions which may be different from those conditions assumed when the original procedure was developed. The PMP changes are formally documented and provided to the Operations Procedures Group for evaluation and incorporation in procedure revisions and changes.
- (8) Requiring that procedures be kept current and accurate is a basic tenet of San Onofre's management philosophy. This philosophy is established as policy in Nuclear Organization Directive D-009, "Formality and Attention to Detail," which states:

"Whenever either the letter or intent of procedures can not, or should not, be met, a formal process must be followed to authorize proceeding unless immediate action is required to minimize the danger to the public or personnel health and safety or to prevent significant equipment damage."

This policy is implemented through administrative procedures which detail the processes to be used to ensure that procedures are changed in a timely manner and is reinforced in the course of access authorization training.

- (9) Quality Assurance (QA) performs periodic audits of the procedure development program using a representative sampling process to provide verification that the program is effective. In addition, QA samples a representative number of program and implementing work procedures during every audit to ensure procedures are current.
- (10) Division Investigation Reports are prepared to provide analysis of significant events which include programmatic failures, human errors, and/or procedural errors. Corrective actions may include the specification of procedure revisions and changes.
- (11) Procedural changes resulting from "lessons learned" during the course of previous outages are recommended and implemented, if deemed warranted, as part of outage planning efforts.
- (12) The Licensed Operator Requalification Program provides a mechanism to identify potential procedural deficiencies during simulator and classroom training. Potential procedural deficiencies are identified to the Operations Procedures Group for resolution through appropriate procedural changes.

These "hands on" processes are superior to the reviews conducted as part of the biennial review process. Therefore, the biennial review

of San Onofre procedures is duplicative, unnecessary, and does not result in enhanced safety at the plant.

To comply with the current Technical Specification requirement that procedures be periodically reviewed, it is proposed that any routine procedures which have not been reviewed in the preceding five years be required to be reviewed within the following twelve months.

3.2 NRC Guidance

In December 1992 the NRC issued a memorandum which addresses the elimination of biennial review by licensees. This memorandum cites four points which should be addressed by licensees in their submittals on elimination of biennial review. Each of these points is addressed below:

- (1) Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system, as specified by Section 5.2 of ANSI N18.7/ANS 3.2 which is endorsed by RG 1.33.

The NRC approved San Onofre Quality Assurance Program and administrative controls require applicable procedures, as determined by station management, to be reviewed following an accident, an unexpected transient, significant operator error, or equipment malfunction.

- (2) Non-routine procedures (procedures such as emergency operating procedures, off-normal procedures, procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event) should be reviewed at least every two years and revised as appropriate.

Emergency Operating Procedures (EOIs), Abnormal Operating Procedures (AOIs), Annunciator Response Procedures associated with the EOIs and AOIs, and other similar "non-routine" Operations procedures receive regular review during licensed operator requalification training. This training includes extensive use of the EOIs and AOIs and their associated Annunciator Response Procedures as part of simulator training, with each EOI used approximately every year and each AOI used approximately every other year. Potential procedural deficiencies which are identified are referred to the Operations Procedures Group for resolution through appropriate procedural changes. This process precludes the need for an additional redundant biennial review. Emergency Plan Implementing Procedures and Security Plan Implementing Procedures are being reviewed annually, as required by the current San Onofre Technical Specifications.

- (3) At least every two years, the Quality Assurance (or other "independent") organization should audit a representative sample of the routine plant procedures that are used more

frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

The intent of the NRC's guidance is being met by required Quality Assurance (QA) audits of functional areas. QA audits of each major functional area are conducted approximately every other year. These QA audits programs are conducted in accordance with the Technical Specifications and the approved Quality Assurance Program. Each audit of a functional area includes a review of procedures for the area being audited. These reviews evaluate the adequacy of procedures as well as their implementation. Furthermore, significant problems associated with Edison's procedure review and revision process would be observed as performance and/or compliance issues in the nuclear programs' procedures and would be identified in program audits, assessments, and/or through established corrective action programs. If concerns are noted, Quality Assurance management has the flexibility to initiate corrective actions and/or conduct a separate audit or assessment of the procedure review and revision process when and if deemed necessary. As such, a separate requirement for a biennial audit of procedures is not warranted.

- (4) Routine plant procedures that have not been used for two years should be reviewed before use to determine if changes are necessary or desirable.

Significant work activities at San Onofre are preceded by a pre-job briefing (tailboard) which is required by administrative procedures. The purpose of this briefing is to assess the scope of the work and verify adequate preparation prior to commencement of the work activities. The briefing includes a review of applicable procedures. Each significant evolution is practiced or verbally walked through to ensure the personnel understand and are familiar with the procedures involved in the evolution. Any problems identified at that time, with either the adequacy or implementation of the procedures, are addressed. In addition, administrative controls governing modifications to plant equipment, industry events, station events, and NRC and INPO correspondence require that potentially affected procedures be identified and revised as necessary. These elements supplant the need for an additional requirement to review routine plant procedures which have not been used during the preceding two years.

3.3 Cost Beneficial Aspect of the Proposed Change

The biennial review process is a manpower intensive effort entailing the processing of 1500-2000 procedures per year with the processing and review of each procedure requiring approximately 2 manhours. This change results in a cost savings greater than \$100,000.

Therefore, this change constitutes a Cost Beneficial Licensing Action.

4. CONCLUSION:

Based on the justification provided above, existing processes provide adequate assurance that routine procedures at San Onofre will remain current and fit for use without the need for the redundant biennial review requirement. Therefore, it is proposed that the requirement for biennial review of routine procedures be eliminated. In accordance with 10 CFR 50.54(a)(3)(iv), this change will be effective immediately upon NRC approval of the change or within 60 days after the change is submitted to the NRC, whichever occurs first. Applicable changes to the UFSAR and the Topical QA Manual will be made at a later date in accordance with the regular revision program.

Elimination of biennial review of routine procedures frees plant resources from the performance of redundant and unproductive procedure reviews, thus allowing for a concentration of available resources on more safety significant issues. In addition, this change also results in a cost savings greater than \$100,000. Therefore, this change constitutes a Cost Beneficial Licensing Action.