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September 12, 1984
EF2-72,792

Mr. James G. Keppler
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Reference: Fermi 2
NRC Docket No. 50-341

Subject: FSAR Changes Relative to the Nuclear Safety Review Group

Pursuant to 10CFR50.55(f), approval is requested to make two changes which would reduce stated or implied commitments to the Quallity Assurance program description in the FSAR. Both changes deal with the off-site review committee designated the Nuclear Safety Review Group (NSRG). The changes are as follows:

1. FSAR Section 17.2.15

Description (See attached marked-up)

REMOVE LAST SENTENCE OF FIRST PARAGRAPH

This change removes the implied requirement that the Nuclear Safety Review Group (NSRG) approval of proposed corrective action is required for nonconforming material considered to be a significant condition adverse to quality.

Rationale:

The NSRG is not st ctured to operate in such an inline fashion. There are no NRC or standards requirements (Fermi 2 Technical Specifications; 10CFR50 Appendix B, ANSI N18.7-1976) that NSRG approval be obtained prior to implementing corrective actions except if an unreviewed safety question or Technical Specification revision is involved. Section 17.2.16 of

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the Fermi 2 FSAR, which deals with corrective action, already provides that corrective actions for significant conditions adverse to quality be documented and reported to the NSRG chairman as well as to the Superintendent - Nuclear Production.

2. FSAR Section 17.2.15

Description (See attached mark-up FSAR page 17.2-23):

AT THE END OF THE LAST SENTENCE REPLACE "...and the NSRG for their review and assessment" WITH "for his review and assessment"

This change removes the requirement that NSRG review all trend analysis reports generated by QA.

Rationale:

While the NSRG would likely review any such report of significance, as well as some of the base documents such as audit and inspection reports, it should not be burdened with another all inclusive specific review requirement adding to an already lengthy list. This specific review requirement does not appear in 10CFR50 Appendix B, the Fermi 2 Technical Specifications or in the related standard, ANSI N18.7-1976.

Neither of these changes is considered to reduce the effectiveness of the Quality Assurance program. Your prompt review and approval is requested.

Please direct any questions to Mr. O. Keener Earle at 313-586-4211.

Sincerely,

cc: Mr. P. M. Byron*
Mr. F. Hawkins*
Mr. M. D. Lynch*
USNRC, Document Control Desk*
Washington, D. C. 20555

*With Attachment

Corrective action will be proposed by technically qualified organizations and approved by supervisory personnel having responsibility for the nonconforming item. ~~If the nonconformance is considered to be a significant condition adverse to quality, the proposed corrective action will also be reviewed by the NSRG.~~

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Copies of completed nonconformance documents are maintained in the plant files.

35 The acceptability of rework, repair, or replacement of materials, parts, components, systems, and structures is verified by inspecting and testing the item for conformance with its original requirements or acceptable alternatives. The inspection and test records are documented and become part of the QA records for the item.

The Nuclear QA Department periodically analyzes quality data obtained from various reports, such as nonconformance documents, inspection reports, and audit reports, to determine what quality 56 trends exist. The analysis is reported to the Superintendent - Nuclear Production ~~and the NSRG for their review and assessment.~~ for his review and assessment.

17.2.16 Corrective Action

Measures are established to ensure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of a significant condition adverse to quality, procedures require that the cause be determined and corrective action be taken to preclude recurrence, and that the significant condition, its cause, and the corrective action be documented and reported to the Superintendent - Nuclear Production and the NSRG chairman. The Nuclear QA Department reviews all nonconformance 56 documents to determine whether the cause of the problem has been identified and adequate action initiated. The Superintendent - Nuclear Production is notified of conditions requiring further action. The QA requirements in procurement documents or contracts require the vendor or contractor not only to identify material or parts that do not conform to the procurement requirements, but also to determine and correct the causes for the 35 nonconformances.

When vendors furnish products that do not conform to the requirements of the applicable purchase contract, the Nuclear QA Department conducts a reappraisal of the vendor's QA program when appropriate. Results of the reappraisal, together with a request for specific corrective actions, are transmitted to the vendor. If the vendor does not improve his QA program and products as requested, the Nuclear QA Department may have the 56 vendor removed from the list of approved suppliers.