



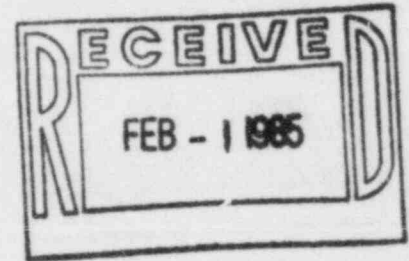
# Public Service Company of Colorado

16805 WCR 19 1/2, Platteville, Colorado 80651

January 29, 1985  
Fort St. Vrain  
Unit #1  
P-85028

Regional Administrator  
Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

ATTN: Mr. Eric Johnson



Docket No.: 50-267

Subject: QA Procedure Review Program

- References:
- 1) PSC Letter Gahm to Collins, dated May 1, 1984 (P-84127)
  - 2) NRC Letter Denton to Walker, dated October 16, 1984 (G-84392)
  - 3) PSC Letter Lee to NRC Regional Administrator, dated January 4, 1985 (P-85003)
  - 4) NRC Letter Martin to Lee, dated January 17, 1985 (G-85024)

Dear Mr. Johnson:

This letter is in response to the NRC request for a report clarifying the phased implementation of the QA Procedure Review Program.

Two Public Service Company commitments to the NRC are involved in this report. One is to establish procedures for review and concurrence by QA of safety-related procedures and changes thereto. The other is to implement a QA review of the content and adequacy of Technical Specification Procedures.

In order to clarify the implementation of the QA Procedure Review Program, and to address the two PSC commitments, the report consists of three attachments.

Attachment 1 provides background information associated with the program, and provides a basis from which the program was derived.

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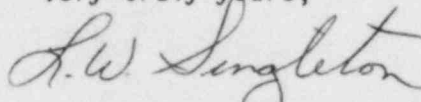
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Attachment 2 provides the implementation status of the program, and includes methodology used to integrate the two commitments.

Attachment 3 provides the timetable anticipated for completion of the procedure review process.

If you have any further questions in this matter, please contact Mr. M. H. Holmes at (303) 571-8409.

Very truly yours,



L. W. Singleton  
Manager, Quality Assurance Division

LWS/MJF/clk

Attachments

ATTACHMENT 1

BACKGROUND  
INFORMATION

1. As a result of NRC comments made concerning the Fort St. Vrain Quality Assurance Program described in Appendix B of the Final Safety Analysis Report and telephone conversations with Mr. Dick Brickly of the Regional Administrator's staff, Quality Assurance provided the NRC with the QA proposals for resolving the NRC comments, and outlined an implementation plan for appropriate areas.

The NRC Comments and QA Proposals are contained in Reference 1), P-84127. Since the purpose of this correspondence is to clarify the QA procedure review process, the NRC Comment and QA Proposal relevant to that subject contained in that letter is repeated here in its entirety. This provides ready access to the material and enhances continuity of this submittal.

NRC Comment - Procedures subordinate to the Administrative Procedures shall be reviewed by QA.

QA Proposal - Permanent procedures involving safety-related activities will be reviewed and concurred with by the QA Department to verify conformance to applicable quality related requirements.

Upon approval of the proposal, implementation of QA review and concurrence will proceed in the following manner:

- 1) Commencing immediately, QA will conduct a review of the FSV procedure system (currently - 1,950 procedures) to determine those procedures which involve safety-related activities. Concurrently, QA will develop guidelines to verify conformance of those procedures to applicable quality requirements.
- 2) Upon completion of 1) above, QA will undertake a review of all procedures determined to involve safety-related activities. The schedule for initial QA review will be concurrent with the PORC review of plant procedures, which reviews all applicable plant procedures on an annual basis. Procedures not reviewed by PORC will be scheduled for QA review on a systematic basis. Findings as a result of this review will be submitted to the responsible organization for resolution prior to QA concurrence with the procedure.
- 3) New or revised procedures involving safety-related activities are to be routed through the QA Department as they are submitted for review

and concurrence. Facility administrative procedures will be revised accordingly to permit QA review and concurrence of applicable procedures.

The QA procedure review and concurrence process is expected to be fully implemented by January 1, 1986.

2. In the USNRC Preliminary Report Related to The Restart and Continued Operation of Fort St. Vrain, the NRC reiterated its desire for QA to review safety-related procedures, and added an additional requirement that the NRC staff had determined that Technical Specification Procedures should be reviewed relative to content and adequacy.

The NRC statements are contained in Reference 2), G-84392. The NRC statements as they appear on page viii of the Executive Summary under Actions Required Following Restart are repeated here in their entirety to provide the continuity previously mentioned.

- g. Establish a procedure for review and concurrence by the QA organization of safety-related procedures and changes thereto.
- i. A review by the QA organization of the content and adequacy of the Technical Specification Procedures is important, and the staff has determined that this should be implemented.

These two requirements were established in Section 5 of the NRC report and are listed as Items 3.b. and 3.d. in the CONCLUSIONS of that section.

QA felt that Item i., above, required clarification due to the broad scope of interpretation possible. This concern was expressed during conversations with Mr. R. E. Ireland of the NRC on November 29, 1984, at Fort St. Vrain. It was agreed that QA would perform a "line-by-line" review of the Technical Specification Surveillance Requirements to verify that each and every test item specified is included in the testing process, and that the Surveillance Tests address the system or components specified in the Surveillance Requirements.

3. In January, 1985, Public Service Company submitted a status of responses to the NRC Report.

The PSC response related to the QA procedure review as contained in Reference 3), P-85003, is repeated in the following in its entirety.

- h. NRC Finding: Establish a procedure for review and concurrence by the QA organization of safety-related procedures and changes thereto.

PSC Response: Quality Assurance procedures are being established, and Administrative Procedure G-2 is being revised to provide for QA review and concurrence of safety-related procedures. Full implementation of this program is targeted for January 1, 1986.

- j. NRC Finding: A review by the QA organization of the content and adequacy of the Technical Specification Procedures is important, and the staff has determined that this should be implemented.

PSC Response: Scope of potential criteria for the Quality Assurance review process of the Technical Specification Procedures is being discussed within Public Service Company.

The Quality Assurance review of Technical Specification Surveillance Test Procedures, excluding the Environmental Surveillance Requirements (ESR's), will begin in conjunction with the implementation phase of the new or revised test procedures. Full implementation of the QA review noted above is targeted for January 1, 1986.

4. As a result of the meeting on the Fort St. Vrain assessment report response held on January 15, 1985, the NRC provided a list of commitments made by PSC during the meeting.

The entire list is contained in Reference 4), G-85024. The part which relates to the QA procedure review is found in Enclosure 3, Section VI, Item B of that letter, and is repeated below.

- B. A report clarifying the phased implementation of the QA procedural changes will be submitted by January 31, 1985.

ATTACHMENT 2  
IMPLEMENTATION STATUS

Quality Assurance has conducted a review of the Fort St. Vrain procedures, developed guidelines to be used in the QA procedure review process, and is in the flow path for routing of new or revised procedures.

The guidelines used by QA in the procedure review process are contained in Quality Assurance General Procedure (QAGP) 5, Quality Assurance Review of Nuclear Project Procedures, which was effective January 15, 1985.

This procedure, QAGP-5, implements the requirements of Administrative Procedures Manual (APM) Procedure G-2, FSV Procedure System which put QA in the procedure review flow path. This was accomplished under Issue 14 of APM G-2 which was effective December 31, 1984.

As of January 25, 1985, QA has processed 91 procedures as part of the overall procedure review process.

Although 21 of the procedures processed were Technical Specification Surveillance Requirements (SR) Tests, the review conducted did not include, nor was it intended to examine, the content and adequacy elements of the SR Test Procedure Review Program.

In preparation for that program, the criteria which will be used to evaluate those procedures have been established.

Major elements include: test procedure content consistent with type of SR Test specified; demonstration of functional intent; inclusion of test acceptance criteria; and return-to-service provisions.

A procedure describing the review process and containing the evaluation criteria is being developed.

The SR Test Review Program will be a "one time" process. That is, all Technical Specification SR Tests will be reviewed in conjunction with the implementation phase of the SR Test Program resulting from the Technical Specification rewrite program. New SR Tests required by Technical Specification Amendments issued after that program is complete will be reviewed in the same manner so that all SR Tests are subjected to the evaluation criteria for content and adequacy.

Subsequent revisions or changes to these SR Tests will be reviewed in accordance with the provisions of QAGP-5. Since the initial review will evaluate the content and adequacy elements of the SR Tests, this method will provide an on-going, integrated program which does not require multiple control elements.



ATTACHMENT 3

COMPLETION  
SCHEDULE

The procedures needed for the review and concurrence by the QA organization of safety-related procedures and changes thereto have been established. As a result, the commitment has been fulfilled and is complete.

The procedure review process for all new or revised procedures has begun. Review of all other applicable procedures is to be scheduled to optimize quality review output without a total drain of manpower resources. It is anticipated, based on the review cycle and the approximately 2,000 procedures involved in the process, that QA will have completed a review of all procedures - at least one time - by July 1, 1986.

The procedure needed for the review by the QA organization of the content and adequacy of the Technical Specification Procedures is being developed. The procedure is scheduled to be issued by April 1, 1985.

The review of the Technical Specification Surveillance Requirement (SR) Test Procedures, excluding the Environmental Surveillance Requirements (ESR's), will begin in conjunction with the implementation phase of the SR Test Program.

It is anticipated that QA will have completed a review of all SR Test Procedures by January 1, 1986.