



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE

ILLINOIS POWER COMPANY

CLINTON POWER STATION

DOCKET NO. 50-461

1.0 INTRODUCTION

In letters dated February 25, 1998, and August 13, 1998, the Illinois Power Company submitted a proposed change which will impact commitments made in their quality assurance program. Revision 26 to the Illinois Power Nuclear Program Quality Assurance Manual (QAM) was initiated to make changes in the organization, eliminate the requirement for three tiers of procedures and development of departmental procedures for each Corporate Nuclear Procedure, delete the description of Quality Assurance Department (QAD) general responsibilities, delete specifics as to the description of Updated Safety Analysis Report Table 3.2-2, delete reference to QAD surveillance activities, delete reference to QAD Quality Control direct inspection activities, and adjust the frequency for specific QAD audits.

2.0 EVALUATION

The licensee deleted references to QAD's surveillance and audit activities in several sections in the QAM. The QAM describes the licensee's implementation of all the criteria of 10 CFR Part 50, Appendix B. The licensee's removal of the statements concerning audits is not considered a reduction in commitment but is considered an elimination of redundant commitments since audit activities are addressed in Chapter 18 of the QAM. Chapter 18 requires audits of activities required by the QAM to meet the criteria of Appendix B, 10 CFR Part 50. The licensee also proposes to eliminate the surveillance activities. CPS will continue to conduct oversight activities previously identified as "surveillances" in the form of "program assessments."

- 2.1 The licensee proposes to delete information in paragraph 1.2.2 concerning the "Corporate Nuclear Procedures (CNPs), which specify the management policies for carrying out the Illinois Power [IP] Company Nuclear Program in accordance with regulatory requirements and the Illinois Power Company commitments to regulatory agencies. Each CNP is reviewed and concurred with by responsible department management for incorporation of quality assurance program requirements. The CNPs are approved for use by the IP corporate officer(s) responsible for the activities covered by the CNP. Corporate Nuclear Procedures require the development and use of departmental procedures or instructions to describe interfaces and accomplish the

activities covered by the CNP." The licensee states that deletion will eliminate unnecessary procedure duplication, improve procedure references, and reduce the potential for errors. Procedures and instructions are still required for governing safety-related activities as described by Chapter 5 of the Quality Assurance Manual (QAM).

Corporate Nuclear Procedures were not the only method by which quality assurance procedures were described. Another vehicle to define the requirements and responsibilities for the generation and use of instructions, procedures, drawings, or related material to control activities which affect quality is described in Chapter 5 of the Quality Assurance Manual. This description is sufficient to meet the requirements of Criteria V, Appendix B, 10 CFR Part 50; therefore, the reduction in commitment is acceptable.

- 2.2 The licensee eliminated the manager of Nuclear Training who reports to the manager of Clinton Power Station and transferred all of the responsibilities to the manager of Nuclear Training & Support, who reports to the Vice President. The licensee proposes to change Paragraph 1.3.5 and 1.3.9. The reduction in commitment is acceptable because all of the duties were transferred and the manager receiving the duties reports to a higher level of management.
- 2.3 The licensee moved the responsibility "...of ensuring that the Independent Safety Engineering Group (ISEG) review function is maintained separate and independent from line management..." to the manager of Nuclear Safety & Performance Improvement (NSPI) from the manager of Nuclear Assessment [Quality Assurance]. The sentence was deleted from paragraph 1.3.8 and placed in paragraph 1.3.9. This change continues to comply with Section 13.4.11.3 of NUREG-0800, "Standard Review Plan (SRP) for the Review of Safety Analysis Reports for Nuclear Power Plants." SRP 13.4.11.3 requires ISEG to perform independent reviews of plant operations in accordance with the guidelines of item I.B.1.2 of NUREG-0600 and NUREG-9737. The reduction in commitment is acceptable because all of the duties were transferred and the manager of NSPI reports to the same level of management.
- 2.4 The licensee proposes to create a new department named Nuclear Safety & Performance Improvement (NSPI) in proposed paragraph 1.3.9. The NSPI Department comprises the ISEG and the Employee Concern Program (ECP), which were transferred from the QAD, and the Licensing Department, the Corrective Action Group, the Independent Analysis Group, and Strategic Planning. The ISEG and the Licensing Department transfers are considered reductions in commitment by the licensee. The ISEG transfer is discussed in Section 2.3 of this document. The Licensing Department transfer reduces the management level of reporting. This department previously reported directly to the Vice President and now reports to a department manager who reports to the Vice President. The reduction in commitment is acceptable because all of the duties were transferred and the lower level of management in no way inhibits or hinders the quality functions performed by Licensing Department personnel.

- 2.5 The licensee proposes to delete the Quality Assurance (Nuclear Assessment) Department general responsibilities from paragraph 1.2.3 of Revision 25. The responsibilities are relocated to other sections of the QAM with the exception of the surveillance activities. The relocated paragraphs include 18.3.3.a, 1.2.4, 1.3.8, 2.2.5, 2.3.5, 18.2.1.b.2, 18.2.1.b.4, 2.2.5, 18.2.1.d, 18.2.1.f, 1.2.3, 1.2.4, 4.3.5, 7.3.5, and 18.3.3.b. Instead of performing a QA surveillance, a QA assessment will be performed. A program assessment as defined by the licensee's implementing procedures, is a review or observation of an activity, process, or product to verify that an applicable action has been or is being accomplished in accordance with applicable requirements or management expectations. The reduction in commitment is acceptable because the responsibilities are still described in the QAM for the Quality Assurance Department.
- 2.6 The licensee proposes to delete in paragraph 2.1 the commitment to keep USAR Table 3.2-1 and the description of Table 3.2-1 current. The licensee considers this acceptable because the USAR is required to be kept current per 10 CFR 50.71. The reduction in commitment is acceptable because 10 CFR 50.71 requires the licensee to periodically update its USAR, which would include USAR Table 3.2-1. Paragraph 50.71(e) states: "This submittal shall contain all the changes necessary to reflect information and analyses submitted to the Commission by the licensee or prepared by the licensee pursuant to Commission requirement since the submission of the original FSAR [USAR] or as appropriate, the last updated FSAR... The revisions must reflect all changes up to a maximum of 6 months prior to the date of filing."
- 2.7 The licensee proposes to delete paragraph 2.2.3 of Revision 25, "Quality Assurance Program Documentation," which discusses the current three tiers of procedures that make up CPS's quality assurance program. The deletion of this paragraph will eliminate the requirement to maintain three tiers of documents and allow the elimination of redundant policies, procedures, or instructions. This change will allow the elimination of unnecessary procedure duplication, improve procedure references, and reduce the potential for errors. The reduction in commitment is acceptable because paragraph 5 of the QAM, "Instructions, Procedures and Drawings," discusses the requirements and responsibilities for the generation and use of procedures to control activities which affect quality.
- 2.8 The licensee proposes to move paragraph 6.3.2 of Revision 25 to paragraph 2.3.5.b. The licensee also proposes to move paragraphs 17.3.2.a and 17.3.2.c of Revision 25 to paragraph 2.3.5.c. This restatement adds the document control and records management responsibilities to the Nuclear Training & Support organization. This change is a result of the consolidation of groups described in paragraph 1.3.5. The reduction in commitment is acceptable because the licensee only restates a previous commitment. The implementation of this commitment is now the responsibility of the Nuclear Training & Support organization.
- 2.9 The licensee proposes to delete paragraphs 3.2.10 and 2.2.4 of Revision 25, which require the entire design control process to be subject to audits and surveillances to ensure that design activities are implemented in accordance with program requirements. Removing the statement concerning the conduct of audits is not considered a

commitment reduction but elimination of redundant commitments as audit activities are addressed in Chapter 18 of the QAM. CPS will continue to conduct oversight activities previously identified as "surveillances" in the form of "program assessments." The reduction in commitment is acceptable because surveillance activities will be replaced by program assessments.

- 2.10 The licensee proposes to delete in paragraph 4.2.5 the detailed methods of changes to procurement documents that only require Purchasing and Material Control Department approval. The licensee states that this level of detail is not necessary in the QAM and is addressed by implementing procedures. The new method allows the licensee to make any commercial term modifications. These types of changes will not follow the same review requirements as the original document. The current commitment states only three types (estimated price, cost codes, and taxes) of commercial changes allowed for lesser review. The reduction in commitment is acceptable because the licensee states its method in sufficient detail to describe changes to procurement documents.
- 2.11 The licensee proposes to delete in paragraph 4.2.5 the requirement that audits and surveillances be conducted to ensure that procurement activities are implemented in accordance with program requirements. Removing the statement concerning the conduct of audits is not considered a commitment reduction but elimination of redundant commitments as audit activities are addressed in Chapter 18 of the QAM. CPS will continue to conduct oversight activities previously identified as "surveillances" in the form of "program assessments." The reduction in commitment is acceptable because surveillance activities will be replaced by program assessments.
- 2.12 The licensee proposes to change paragraph 4.3.5.a from "Evaluate supplier technical ability and approve supplier quality assurance program" to "Evaluate suppliers' technical abilities and suppliers' quality assurance programs." The Quality Assurance Department activities associated with suppliers' programs are addressed by Sections 7.3.5 and 18.3.3.b of the QAM. The Quality Assurance Department does not "approve" a supplier's program. The Quality Assurance Department ensures a supplier conforms to the provisions of the applicable procurement document. This proposed change is consistent with Regulatory Guide 1.123, Revision 1, which endorses ANSI N45.2.13-1976. Section 1.2.2.c of ANSI N45.2.13-1976 requires evaluation of the supplier's quality assurance program to assure that it is appropriate and satisfies the requirements for the items or services being purchased. The Quality Assurance Department activities are only a portion of the supplier's "approval" process. The process is described by documented procedures and instructions that remain in place. This is considered to be a reduction in commitment due to the removal of the word "approve." No changes, however, are being made to the current program controls or applicability. The reduction in commitment is acceptable because the licensee is not required to approve a supplier's quality assurance program. However, the licensee is required to perform source surveillances and audits of suppliers' quality assurance programs and facilities and all other applicable requirements in ANSI N45.2.13-1976.
- 2.13 The licensee proposes to delete in paragraphs 7.2.9, 7.3.5.c, and 7.3.5.d the surveillance and audits necessary to ensure that control measures applied to purchased

material, equipment, and services meet the requirements. Removing the statement concerning the conduct of audits is not considered a commitment reduction but elimination of redundant commitments as audit activities are addressed in Chapter 18 of the QAM. CPS will continue to conduct oversight activities previously identified as "surveillances" in the form of "program assessments." The reduction in commitment is acceptable because surveillance activities will be replaced by program assessments.

- 2.14 The licensee proposes to delete in paragraph 9.2.5 the surveillances and audits of special processes to ensure compliance with appropriate codes, standards specifications, and procedures. Removing the statement concerning the conduct of audits is not considered a commitment reduction but elimination of redundant commitments as audit activities are addressed in Chapter 18 of the QAM. CPS will continue to conduct oversight activities previously identified as "surveillances" in the form of "program assessments." The reduction in commitment is acceptable because surveillance activities will be replaced by program assessments.
- 2.15 The licensee proposes to delete "direct" from the phrase "direct inspection" from paragraph 10.2.1.d. The Quality Control group of the Quality Assurance Department is responsible for inspection activities. The Quality Control group performs inspection activities through the monitoring of processes, equipment, and personnel. In the "Terms" section of the QAM, the licensee defines inspection as a phase of quality control which by means of examination, observation or measurement determines the conformance of materials, supplies, components, parts, appurtenances, systems, processes, or structures to predetermined quality requirements. This definition is consistent with the definition for inspection in ANSI N45.2.10-1973. When necessary to provide an adequate level of product quality assurance, the licensee has committed to direct inspection in paragraph 10.2.1.d. The reduction in commitment is acceptable because the term "inspection" as compared to the term "direct inspection" describes the required activities of the quality control organization, as stated in Criteria X, Appendix B of 10 CFR Part 50.
- 2.16 The licensee proposes to delete in paragraph 10.3.3.c the audit and surveillance commitment for inspections. Removing the statement concerning the conduct of audits is not considered a commitment reduction but elimination of redundant commitments as audit activities are addressed in Chapter 18 of the QAM. CPS will continue to conduct oversight activities previously identified as "surveillances" in the form of "program assessments." The reduction in commitment is acceptable because surveillance activities will be replaced by program assessments.
- 2.17 The licensee proposes to delete in paragraph 12.2.3 the surveillances and audits that are conducted on the control of measuring and test equipment. Removing the statement concerning the conduct of audits is not considered a commitment reduction but elimination of redundant commitments as audit activities are addressed in Chapter 18 of the QAM. CPS will continue to conduct oversight activities previously identified as "surveillances" in the form of "program assessments." The reduction in commitment is acceptable because surveillance activities will be replaced by program assessments.

- 2.18 The licensee proposes to delete the following sentence from paragraph 15.2.5, "Procurement documents require that suppliers have similar measures established for the identification, control and dispositioning of nonconformances and that recommended dispositions of *use as is* or *repair* must be reported to IP for approval." This proposal removes from the QAM a redundant commitment that is consistent with Regulatory Guide 1.123, Revision 1, which conditionally endorses ANSI N45.2.13-1976. Section 8.2 of ANSI N45.2.13-1976 states the requirements for nonconformances. The Quality Assurance Department activities are only a portion of the supplier's "approval" process. Procurement documents require provisions for suppliers to report and disposition nonconformances. In addition, QAM paragraph 16.2.1 requires the Corrective Action Program for suppliers to identify conditions adverse to plant safety and quality and promptly report. The reduction in commitment is acceptable because this information is redundant. Procurement activities per the requirements of paragraph 4.2.2.e and 16.2.1 of the QAM and the commitment to Regulatory Guide 1.123, Revision 1, which conditionally endorses ANSI N45.2.13-1976, are sufficient. The licensee considers this to be a reduction in commitment due to the removal of the text from this portion of the QAM. The licensee has not requested any new exceptions to Regulatory Guide 1.123, Revision 1, which conditionally endorses ANSI N45.2.13-1976.
- 2.19 The licensee proposes to change the audit frequency from 12 to 24 months. The licensee states that this change completes an effort started in Revision 25 of the QAM when the audit topics and frequencies were specifically incorporated into Chapter 18. During that revision, the audit frequencies were adjusted based on industry standards and performance (or lack of deficiencies found) in the activity being audited. The radiological environmental monitoring program that incorporates commitments to Regulatory Guide (RG) 4.15 audit frequencies identified in paragraphs 18.2.1.b.11 and 18.2.1.b.14 were not changed in Revision 25. This is an acceptable reduction based on the low number of deficiencies identified during the performance of this audit historically, the requirements in RG 4.15, and ANSI Standard N18.7-1976, which specifies audit frequencies of 2 years for safety-related activities.
- 2.20 The licensee proposes in paragraph 18.2.1.g to add: "Audit planning may credit reviews such as assessments or inspections performed by non-Audits sections of the Quality Assurance Department when determining the scope and activities to be assessed by an audit." The licensee states that this change recognizes that reviews performed by non-auditor personnel in the QAD may be equivalent to the assessment performed during an audit. To avoid duplication and dilution of effort, it is appropriate to evaluate and credit these reviews during audit planning. While the personnel who performed the reviews being evaluated may not be qualified auditors or certified Lead Auditors, they are qualified to perform the assigned assessments by the QAD Training, Qualification and Certification Program procedures. This is considered to be a commitment reduction as it allows for a different means of audit planning than was described previously.

The licensee is committed to Regulatory Guide 1.144, Revision 1, which endorses ANSI N45.2.12-1977. ANSI N45.2.12-1977 defines "auditor" as any individual who performs any portion of an audit, including lead auditors, technical specialists, and others such as management representatives and auditors in training. Only auditors can perform an

audit. Section 4.2.1 of ANSI N45.2.12-1977 states that an audit plan shall identify the audit scope and the activities to be audited. Therefore, any credit given to reviews such as assessments or inspections performed by a non-Audit section member can only be used in determining the audit scope and the activities to be audited. This credit cannot be used to verify performance.

As described by Chapter 1 of the CPS Quality Assurance Manual, all Illinois Power Quality Assurance personnel are independent from work, cost, and scheduling pressures. The Audit Team Leader is responsible to review previous, documented Quality Assurance Department overview activities reports and inspection activities performed by Quality Assurance personnel. The reduction in commitment is acceptable because the auditors are still independent from work, cost, and scheduling pressures and the auditing organization is still responsible for planning the scope of the audit activities.

- 2.21 The licensee proposes in paragraph 18.3.4 to give the Nuclear Safety & Performance Improvement Department (NSPI) the responsibility for the ISEG organization. The transfer of the ISEG from the QAD to NSPI constitutes a reduction in commitment from the currently accepted QAM in that it reassigns an activity from the QAD to another group. However, this is an acceptable reduction in that the ISEG functions, including the quality assurance functions as described in the currently accepted QAM, will continue to be maintained separate and independent from line management. ISEG functions have not been altered and are being performed by the same individuals. The organizational change provides an equivalent level of control over the activity. This change does not affect continued compliance with 10 CFR Part 50, Appendix B. The reduction in commitment is acceptable because all of the duties were transferred and the manager of NSPI reports to the same level of management as does the QAD manager.

3.0 CONCLUSION

The proposed QAM exceptions described above constitute a reduction in commitment in the QAM previously approved by the NRC, however, these exceptions continue to satisfy the provisions in NUREG-0800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants." Therefore, the proposed revision to CPS's QAM, dated February 25, 1998, continues to comply with the quality assurance criteria of Appendix B to 10 CFR Part 50 and is acceptable.

Principal Reviewer: M. Bugg

Date: September 17, 1998