



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO NUCLEAR QUALITY ASSURANCE PROGRAM

TOLEDO EDISON COMPANY

CENTERIOR SERVICE COMPANY

AND

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

DAVIS-BESSE NUCLEAR POWER STATION, UNIT NO. 1

DOCKET NO. 50-346

1.0 INTRODUCTION

By letter dated August 24 1998, Toledo Edison Company, Centerior Service Company, and The Cleveland Electric Illuminating Company (the licensees), submitted a request for changes to the Davis-Besse Nuclear Power Station, Unit No. 1, Updated Safety Analysis Report (USAR) Chapter 17.2, "Quality Assurance During the Operations Phase." The proposed changes in the Quality Assurance Program (QAP) would transfer most material receipt inspection functions from the Nuclear Assurance Department's Nuclear Safety and Inspection Section to the Engineering and Services Department's Design Basis Engineering Section.

2.0 EVALUATION

The following activities are presently performed by Nuclear Assurance receipt inspection personnel:

preparing receipt/source inspection procedures and checklists

review of procurement documents for receipt/source inspection planning (including inspection criteria, hold/witness points, and supplier inclusion on the Approved Vendors List)

receipt/source inspection review/verification of vendor supplied documentation (including Certificates of Conformance, Certificates of

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Compliance, and material physical/chemical analysis reports)
receipt/source inspection (including performing/waiving hold points)
items receipt/source inspection acceptance status tagging
item receipt/source inspection release
coordination of corporate receipt/source inspection services.

The licensees propose to transfer the above receipt inspection activities to the Design Basis Engineering organization, except for those related to nuclear fuel and radioactive waste areas. The receipt inspection responsibilities being transferred will continue to be performed by ANSI N45.2.6 qualified personnel independent from the organizations being inspected. The Nuclear Assurance Department's Nuclear Safety and Inspection Section will maintain responsibility for the training and qualification of the Design Basis Engineering inspectors to maintain requisite independence. QAP Section 17.2.10.1 inspection requirements that

individuals performing inspections are other than those who performed or directly supervised the activity being inspected

will continue to be satisfied as individuals performing receipt/source inspections will be other than those who performed or directly supervised the activity being inspected. In addition, Design Basis Engineering receipt/source inspectors will not be subjected to the same operational pressures as those engineers involved with daily plant operation (for example, system engineers) since they will be part of the design control function ensuring that purchased material equipment conform to design/procurement specifications. Also, procurement engineers will continue to perform self-sponsored peer reviews for checking procurement engineering products and services.

Nuclear Assurance/Quality Assessment auditors will continue to provide independent quality assurance oversight/checking of procurement engineering functions, including receipt/source inspection, during surveillance of related processes and audits performed pursuant to 10 CFR 50 Appendix B Criterion XVIII, Technical Specification 6.5.2.8 and QAP 17.2.18.1 requirements.

3.0 CONCLUSION

The proposed reduction in commitment is acceptable because it only changes

licensee self-imposed commitments. This proposal does not take any new exceptions to QAP-committed NRC Regulatory Guides or ANSI Standards that provide the basis for satisfying a 10 CFR 50 Appendix B quality assurance program. The proposed QAP change that was described by the licensees as a "reduction in commitment" continues to satisfy the provisions in Section 17.2 of the Standard Review Plan (NUREG-0800).

Principal Reviewer: M. Bugg

Date: October 28, 1998