

From: Daniel Dorman
To: John Minns
Date: 4/4/01 3:28PM
Subject: TMI-2 Procedure reviews (TAC MB0500)

John,

IQPB has reviewed the amendment package you sent down for concurrence. This is related to the licensee's July 25, 2000, TS Change Request No. 80. The licensee has not provided an acceptable alternative to the biennial procedure review commitment they propose to remove. Therefore we cannot concur with the amendment. More detail on our position is provided in the attached file. Ken Heck will be your point of contact for further discussions on this issue. Ken can be reached at 415-2682.

Dan

CC: Kenneth Heck; Robert Gramm; Theodore Quay

Fundamentally, the licensee has proposed to eliminate a quality assurance commitment from the licensing basis without proposing an acceptable alternative to provide assurance that compliance with Appendix B is maintained. The following lays it out in further detail.

Appendix B to 10 CFR Part 50 establishes quality assurance criteria for nuclear power plants such as TMI-2. Criterion V, "Instructions, Procedures, and Drawings," states in part, "Activities affecting quality shall be prescribed by documented instructions, procedures, or drawings." Criterion VI, "Document Control," states in part, "Measures shall be established to control the issuance of documents, such as instructions, procedures, and drawings, ... These measures shall assure that documents, including changes, are reviewed for adequacy and approved for release by authorized personnel and are distributed to and used at the location where the prescribed activity is performed."

NUREG-0800, "Standard Review Plan," Chapter 17.2, "Quality Assurance During the Operations Phase," provides guidance to the NRC staff for review of proposed quality assurance program changes for operating reactors. The acceptance criteria of NUREG-0800, Chapter 17.2, refer to the acceptance criteria of Chapter 17.1, "Quality Assurance During the Design and Construction Phases." Chapter 17.1, Acceptance Criterion 6B1 states, "Procedures are established and described to assure that obsolete or superseded documents are removed and **replaced by applicable revisions** in work areas **in a timely manner**." (Emphasis added.) Acceptance Criterion 6C1 states, "Procedures are established and described to provide for the preparation of as-built drawings and related documentation **in a timely manner** to accurately reflect the actual plant design." (Emphasis added.)

The TMI-2 TS currently requires that specified procedures "shall be reviewed periodically as required by ANSI N18.7-1976." ANSI N18.7-1976 states that procedures shall be reviewed biennially. The licensee's commitment to ANSI N18.7-1976 provides assurance that the obsolete or superseded material in procedures is replaced by applicable revisions in a timely manner. The proposed amendment would remove from the Technical Specifications to licensee-controlled documents ("administrative procedures") the timeliness requirement for

periodic procedure reviews. Under this proposal, the licensee would have unilateral authority to revise or eliminate the frequency of procedure review. The proposed revision therefore fails to provide reasonable assurance of continued compliance with the provisions of Appendix B to 10 CFR Part 50. In particular, the proposed change does not provide adequate "measures to assure that documents, including changes, are reviewed for adequacy." Therefore the proposed change is not acceptable.

The staff have accepted alternatives to the biennial review of ANSI N18.7-1976 where appropriate basis has been provided to support a conclusion that reasonable assurance of compliance with Appendix B is maintained. However, the licensee's basis for the proposed change is essentially that the change is necessary to make the TMI-2 TS consistent with an anticipated change to the TMI-1 quality assurance program description (QAPD). **TMI-2 has provided no acceptable alternative nor an acceptable basis for eliminating this commitment.** Assuming that TMI-1 pursues a similar change to their quality assurance program description (QAPD), they should provide an alternative with appropriate basis to justify it. Alternatively, the TMI-2 licensee could propose relocation of the biennial review commitment from TS to the TMI-2 QAPD with a new alternative for procedure review frequency and appropriate justification. Following NRC approval of an acceptable alternative, the revision could be adopted in the TMI-1 QAPD as a non-reduction in commitment pursuant to 10 CFR 50.54(a)(3)(ii).

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