

Detroit
Edison

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September 13, 1993
NRC-93-0079

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

- References: 1) Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-43
- 2) Detroit Edison Letter to NRC, NRC 93-0062, Dated
May 24, 1993
- 3) Nuclear Regulatory Commission Meeting Summary for
June 9, 1993, Dated June 23, 1993

Subject: Proposed Technical Specification Change (License
Amendment) and Quality Assurance Program Change
for Audit Program

Pursuant to 10 CFR 50.90, Detroit Edison Company hereby proposes to amend Operating License NPF-43 for the Fermi 2 plant by incorporating the enclosed change into the Plant Technical Specifications. The proposed change relocates audit program frequency requirements from Technical Specifications into the licensee submitted Quality Assurance Program. Pursuant to 10 CFR 50.54(c), Detroit Edison is also proposing the corresponding change to the Quality Assurance Program contained in Section 17.2 of the Fermi 2 Updated Final Safety Analysis. The Technical Specification change is submitted as a lead plant change with the concurrence of the Great Lakes QA Managers organization. The Great Lakes QA Managers organization is an information sharing group of QA Managers from midwestern licensees. The group members share a common interest in improving the effectiveness of their audit and assessment programs.

This amendment eliminates the frequency requirements for the audit program from Technical Specifications. The relocation of the audit program frequencies to the Quality Assurance (QA) Program will allow Detroit Edison to adjust the audit frequencies with NRC oversight rather than the current situation which has the NRC controlling the audit program. The NRC will retain oversight since all changes to the QA Program are treated per 10 CFR 50.54(a). The change will allow Detroit Edison to adjust audit frequencies based upon plant performance of specific programs and organizations. Each licensee

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will use their own monitoring program to adjust their audit program. Statements in this submittal refer specifically to Detroit Edison's assessment methodology. This change will also allow each licensee some leeway to better focus the efforts of audit and surveillance personnel on how to improve weak or declining performance areas. This idea was recently discussed during the Public Workshop on NRC's Program for Elimination of Requirements Marginal to Safety and in a meeting at NRC headquarters on June 9, 1993, as summarized in Reference 3.

Enclosure 1 provides a description and evaluation of the proposed change and an analysis of the significant hazards consideration assessment using the standards in 10 CFR 50.92.

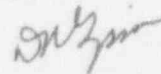
Enclosure 2 provides marked up pages of the existing Technical Specifications to show the proposed change and a typed version of the affected Technical Specification pages with the proposed changes incorporated. Page 6-12 of Technical Specifications is also affected by the proposed change included in Reference 2.

Enclosure 3 provides the proposed QA Program modification.

Detroit Edison has evaluated the proposed Technical Specifications against the criteria of 10 CFR 50.92 and determined that no significant hazards consideration is involved. The Fermi 2 Onsite Review Organization has approved and the Nuclear Safety Review Group has reviewed the proposed Technical Specifications and concurs with the enclosed determinations. In accordance with 10 CFR 50.91, Detroit Edison has provided a copy of this letter to the State of Michigan.

If you have any questions, please contact Mr. Glen D. Ohlemacher at (313) 586-4275.

Sincerely,



Enclosures

cc: T. G. Colburn

W. J. Kropp

M. Phillips

Supervisor, Electric Operators, Michigan

Public Service Commission - J. R. Padgett

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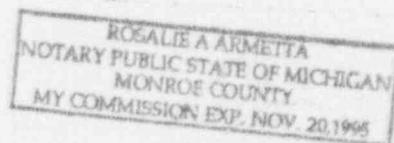
I, DOUGLAS R. GIPSON, do hereby affirm that the foregoing statements are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

D. R. Gipson

DOUGLAS R. GIPSON
Senior Vice President

On this 13th day of September, 1993, before me personally appeared Douglas R. Gipson, being first duly sworn and says that he executed the foregoing as his free act and deed.

Rosalie A. Armetta
Notary Public



Enclosure 1 to
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Enclosure 1
DESCRIPTION, EVALUATION,
AND ANALYSIS OF
SIGNIFICANT HAZARDS CONSIDERATION
ASSESSMENT
OF THE PROPOSED CHANGE

ENCLOSURE 1

FERMI 2
NRC DOCKET 50-341
OPERATING LICENSE NPP-43

INTRODUCTION

Currently Section 6.5.2.8 of the Technical Specifications contains requirements for the audit program. Areas to be audited and frequencies of the audits are specified. Since these requirements are in Technical Specifications, no flexibility exists to adjust the audit program to make the audits more meaningful. Audits are required to be performed regardless of activities in progress. For example, the audit of processing and packaging of radioactive wastes is required when due, even if minimal processing and packaging is being performed the month it is due and considerable processing and packaging activities will be performed the following month. A much more meaningful performance based audit could be performed if the audit was delayed a month in these circumstances. Some activities are conducted only during refueling outages, so it makes sense to audit those activities (e.g. inservice inspection) during refueling outages and not to audit the environmental monitoring program at that time. The Technical Specification does not prevent an extra audit from being added to cover an activity during a refueling outage, but it does prevent delaying an audit to either catch or avoid a refueling outage. The lack of flexibility can also lead to auditing an activity prior to corrective action completion when the audit could have measured the effectiveness of corrective action if postponed a short time. Additionally, the current audit program requirements can claim resources for auditing non-problem areas that would be better used in monitoring and assessing weak areas or areas of decreasing performance before they become weak areas.

This proposed Technical Specification change deletes the audit program frequency requirements from the Fermi 2 Technical Specifications and relocates the audit frequencies to the Quality Assurance Program located in the Updated Final Safety Analysis Report (UFSAR) Section

17.2. This proposed change will allow Detroit Edison some leeway to adjust the audit program with NRC oversight per 10 CFR 50.54(a).

The Fermi 2 Quality Assurance Program is proposed to be amended to include a listing of audited areas, that the schedule will be based on performance, and the maximum interval between audits. A 25% extension in the audit interval will be permitted to be able to adjust the audit schedule to better match plant activities so that the types of problems mentioned earlier do not occur. Frequencies of audits required by specific regulations to be performed at certain intervals will also be specified, but the 25% extension will not be applied to these audits unless permitted by the wording of the regulation.

The proposed Technical Specifications change is being submitted as a lead plant change with the concurrence of the Great Lakes QA Managers organization, an information sharing group of QA Managers from midwestern licensees. The QA Program changes needed to complement the Technical Specification change will vary between licensees, in part due to current differences between audit programs and QA Programs. Changes to Technical Specification Section 6.5.2.8 are needed to implement this revision.

EVALUATION OF TECHNICAL SPECIFICATION CHANGE

The proposed change is to relocate the audit program frequency requirements from the Technical Specifications to the QA Program located in Section 17.2 of the UFSAR. Specifically, the change revises Section 6.5.2.8 of the Technical Specifications to delete the frequencies of audits. The basis for the proposed change is that it allows Detroit Edison some flexibility in establishing audit frequencies based upon the performance of the program or organization being audited. Any audits required to be conducted at a specified frequency by 10 CFR will continue to be done at the required frequency unless a specific exemption is or has been granted or the rule is changed. Fermi 2 has received no such approved exemptions.

This change is administrative in nature and does not impact the actual operation of the plant. It will improve safety by allowing a shift in resources to concentrate on weak or declining performance areas/organizations and thus improve the safety performance of the plant. Areas with a consistently high performance would be audited less frequently, but areas with poor or declining performance would be audited or surveilled more frequently. The current process has proven to be not necessarily effective in that some audits have been required to be performed again before the affected organizations have had a chance to respond and show the results of the corrective actions to the last audit. This has been particularly true of audits which are

required to be performed every 6 or 12 months. This change is consistent with the Improved Technical Specifications in that the revised section 5.5.2.3 on Audit Responsibilities in the Improved Technical Specifications does not contain any frequencies for the audited areas.

In accordance with 10 CFR 50.54(a), licensees can make changes to the QA Program in the UFSAR provided the changes do not reduce commitments in the program previously accepted by the NRC. Changes that do reduce commitments must be submitted to the NRC and receive approval prior to implementation. The requirement in 10 CFR 50.54(a) ensures that the NRC has the opportunity to review any future reductions in audit coverage as specified in the QA Program prior to the reductions in commitment being made. Concurrent with the review of this Technical Specification change, the NRC will have the opportunity to review the proposed initial QA Program revision incorporating the details of the audit program and so will be able to raise any concerns with the proposed audit scheduling. While Detroit Edison will have ownership of the audit program frequency requirements, the NRC will have oversight and will retain approval authority over any reductions in commitments. This proposal, therefore, is similar to previously endorsed relocations of Technical Specification requirements to other documents, such as Fire Protection specifications to the UFSAR and environmental monitoring requirements to the Offsite Dose Calculation Manual.

In relocating frequencies from the Technical Specifications, the requirement to use an outside independent fire protection consultant at least every third year to audit fire protection equipment and program implementation was changed to every third audit. The change from every third year to every third audit maintains the same fraction of outside independent viewpoint.

The main benefit of this proposed change is to provide more flexibility so that Quality Assurance oversight efforts can be better focused based on performance and plant activities. An additional advantage of controlling the audit program frequency in the QA Program is that the QA Program can be revised more efficiently than the Technical Specifications, saving NRC and Detroit Edison resources. The Technical Specification revision process is resource and time intensive. QA Program changes requiring NRC review prior to implementation are generally reviewed within 60 days after submittal. This is more efficient than the typical Technical Specification change.

This revision is consistent with draft Standard Review Plan 17.3 which discusses that in a performance based QA Program, audits are scheduled

based on plant and activity status, the safety significance of activity being assessed, and past performance.

SIGNIFICANT HAZARDS CONSIDERATION

In accordance with 10 CFR 50.92, Detroit Edison has made a determination that the proposed Technical Specification amendment involves no significant hazards considerations. To make this determination, Detroit Edison must establish that operation in accordance with the proposed amendment would not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated, or 2) create the possibility of a new or different kind of accident from any accident previously evaluated, or 3) involve a significant reduction in a margin of safety. The basis for this determination is as follows:

The proposed change to relocate the audit program frequency requirements to the Quality Assurance Program does not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated,

This change is administrative in nature and does not impact the operation of the plant or the plant's response to any accident. Because it will allow more flexibility in assigning resources to assess weak or declining performance areas, the plant safety performance will be improved.

- 2) create the possibility of a new or different kind of accident from any accident previously evaluated,

This change is administrative in nature and does not affect the operation or design of the plant; therefore, there is no change in the possibility of a new or different kind of accident from any accident previously evaluated.

- 3) involve a significant reduction in a margin of safety.

This change is administrative in nature and does not affect the operation of the plant; therefore, there is no change in the margin of safety. Relocating the audit program frequency requirements to the Quality Assurance program will allow a more dynamic and responsive audit program. Audits will be able to be scheduled more effectively based on performance and the status of related activities. This should result in a more effective audit program that will contribute to an improvement in safety.

ENVIRONMENTAL IMPACT

Detroit Edison has reviewed the proposed Technical Specification change against criteria of 10 CFR 51.22 for environmental considerations. The proposed change does not involve a significant hazards consideration, nor significantly increase the amount of effluents that may be released offsite, nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, Detroit Edison concludes that the proposed Technical Specifications do meet the criteria given in 10 CFR 51.22(c)(9) for a categorical exclusion from the requirements for an Environmental Impact Statement.

EVALUATION OF THE QA PROGRAM REVISION

As discussed earlier, a listing of audited areas, a requirement that schedules be based on performance, and the maximum intervals for audits are to be added to the QA Program. It is proposed to amend Section 17.2.18.5 of the UFSAR (see Enclosure 3) to include the listing of required audits and audit frequencies. An allowance is provided for a 25% extension in the audit interval, except for those audits whose frequency is specified in a regulation. For those cases for which the regulation specifies only a nominal frequency, the 25% interval extension will be permitted. The QA Program already discusses revision of the audit program schedule based on the status of activities. A provision is added discussing that a prominent factor in audit scheduling will be performance of activities in the audit program scope.

The proposed scope of the audit program to be specified in the QA Program is the audits specified by Technical Specifications and audits specified by NRC rules or which are committed to elsewhere in the UFSAR explicitly or by reference to another document. Having an integrated list of required or committed audits will help personnel in the future, especially when they consider modifications to the audit program. Since the list of audits is greater than that currently in the Technical Specifications there is no reduction in scope.

The proposed maximum audit intervals are established at 24 months at this time, with the exception of audits of activities required by regulations to be conducted at specified frequencies and the corrective action audit. The corrective action audit's maximum interval will be set at 12 months, due to the importance of this program and how it affects other programs' performance. This area is also looked at during the audit of each area's performance. The actual corrective action audit frequency will temporarily stay at every 6 months until performance improves. This is an example of how

performance will be used in scheduling audits. The proposed 24 month frequency for most audits will allow some flexibility so that oversight can be better focused based on performance and activities in progress, while assuring that each area will be audited at a minimum frequency.

A 25% extension is permitted to the specified interval except for frequencies required by regulation to allow some flexibility so audits can be scheduled wisely based on activities being performed.

Some performance parameters that will be used in determining the audit schedule will include the result of the previous audit, assessment report results, and corrective action trends. Areas that demonstrate poor or declining performance will be audited or surveilled more frequently than specified and other areas will in some cases be audited less frequently than currently specified. These adjustments should have a positive impact on safety as resources are shifted to better focus on weak or declining performance areas, while still providing periodic audit coverage of other stronger areas.

Section A.1.33 of the UFSAR will also be revised to state that exception is taken from the audit program scope and frequency described in Regulatory Guide 1.33 and ANSI N18.7-1976 as endorsed by R.G.1.33. Proposed Section A.1.33 will refer to Section 17.2.18 for governing provisions for the audit program.

NRC approval of the QA Program change implementing this Technical Specification change is requested concurrently with approval of the Technical Specification change. Detroit Edison requests that a letter lengthening the NRC review cycle for the QA Program change be sent if the Technical Specification revision is not approved within 60 days of submittal, so that the QA Program change does not get approved prior to the Technical Specification change. A 30 day implementation period is requested following approval of the Technical Specification change to permit revision of site procedures.

CONCLUSION

Based on the evaluation above: 1) there is reasonable assurance that the health and safety of the public will not be endangered by the operation in the proposed manner, and 2) such activities will be conducted in compliance with the Commission's regulations and the proposed amendments will not be inimical to the common defense and security or to the health and safety of the public.