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## ADMINISTRATIVE CONTROLS

### REVIEW (Continued)

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the OSRO.

### AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRG. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions;
- b. The performance, training and qualifications of the entire unit staff;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50;
- e. The fire protection programmatic controls including the implementing procedures by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation, utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least every third audit;

## ADMINISTRATIVE CONTROLS

### AUDITS (Continued)

- g. Any other area of unit operation considered appropriate by the NSRG or the Senior Vice President;
- h. The radiological environmental monitoring program and the results thereof;
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures;
- j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes; and
- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975.

### RECORDS

6.5.2.9 Records of NSRG activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRG meeting shall be prepared, approved, and forwarded to the Senior Vice President within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Senior Vice President within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Senior Vice President and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

### 6.5.3 TECHNICAL REVIEW AND CONTROL

#### ACTIVITIES

6.5.3.1 Procedures required by Technical Specification 6.8, and other procedures which affect plant nuclear safety as determined by the Plant Manager, and changes thereto, shall be prepared by a qualified individual/organization.

## ADMINISTRATIVE CONTROLS

### REVIEW (Continued)

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the OSRO.

### AUDITS

6.5.2.B Audits of unit activities shall be performed under the cognizance of the NSRG. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions ~~at least once per 12 months~~;
- b. The performance, training and qualifications of the entire unit staff ~~at least once per 12 months~~;
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety, ~~at least once per 6 months~~;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50, ~~at least once per 24 months~~;
- e. The fire protection programmatic controls including the implementing procedures ~~at least once per 24 months~~ by qualified licensee QA personnel;
- f. The fire protection equipment and program implementation, ~~at least once per 12 months~~ utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least every third year;

*audit*

## ADMINISTRATIVE CONTROLS

### AUDITS (Continued)

- g. Any other area of unit operation considered appropriate by the NSRG or the Senior Vice President;
- h. The radiological environmental monitoring program and the results thereof ~~at least once per 12 months~~;
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures ~~at least once per 24 months~~;
- j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes ~~at least once per 24 months~~; and
- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975 ~~at least once per 12 months~~.

### RECORDS

6.5.2.9 Records of NSRG activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRG meeting shall be prepared, approved, and forwarded to the Senior Vice President within 14 days following each meeting.
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the Senior Vice President within 14 days following completion of the review.
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the Senior Vice President and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

### 6.5.3 TECHNICAL REVIEW AND CONTROL

#### ACTIVITIES

6.5.3.1 Procedures required by Technical Specification 6.8, and other procedures which affect plant nuclear safety as determined by the Plant Manager, and changes thereto, shall be prepared by a qualified individual/organization.

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PROPOSED

QA PROGRAM

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#### QA PROGRAM INSERT

##### Insert for Section 17.2.18.5

A prominent factor in developing and revising audit schedules will be performance in the subject area. The audit schedule will be revised so that weak or declining areas get increased audit or surveillance coverage and strong areas receive less coverage. A maximum interval is set to ensure that all areas receive periodic audit coverage.

The following internal Nuclear Generation areas will be audited at least once per 24 months, except where a specific frequency is listed. A 25% interval extension is permitted to be able to schedule the audit based on plant activities, 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. These cases are noted in the following list.

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the entire unit staff.
- c. The results of actions taken to correct deficiencies occurring in unit equipment, structures, systems, or method of operation that affect nuclear safety at least once per 12 months.
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10CFR Part 50.
- e. The fire protection programmatic controls including the implementing procedures by qualified licensee QA personnel.
- f. The fire protection equipment and program implementation, utilizing either a qualified offsite licensee fire protection engineer(s) or an outside independent fire protection consultant. An outside independent fire protection consultant shall be utilized at least every third audit.
- g. Any other area of unit operation considered appropriate by the Nuclear Safety Review Group or the Senior Vice President-Nuclear Generation.
- h. The radiological environmental monitoring program and the results thereof.



- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes.
- k. The performance of activities required by the Quality Assurance Program to meet the provisions of Regulatory Guide 1.21, Revision 1, June 1974 and Regulatory Guide 4.1, Revision 1, April 1975. (Radioactive Effluents and Environmental Monitoring)
- l. The Safeguards Contingency Plan and Security Program at least once every 12 months (specified by regulation).
- m. Access Authorization at least once per 24 months (specified by regulation).
- n. Fitness for Duty at least once every 12 months (specified by regulation as nominal frequency, so 25% may be applied).
- o. Fitness for Duty Laboratory at least once every 12 months (specified by regulation as nominal frequency, so 25% may be applied).
- p. Emergency Preparedness at least once per 12 months (specified by regulation).
- q. Radiological Protection at least once per 12 months (specified by regulation).
- r. Station Blackout.
- s. Nonradiological Environmental Protection Program.



INSERT FOR SECTION A.1.33

Exception is taken from the audit program scope and frequency of audits described in Regulatory Guide 1.33 and ANSI N18.7-1976 as endorsed by Regulatory Guide 1.33. The provisions in the Quality Assurance Program described in Subsection 17.2.8 govern the audit program.

L. GOODMAN

17.2.17.3 Vendor or Contractor QA Records

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Vendors or contractors who exercise the option to retain QA records will comply with the following requirements:

- a. Meet Edison's requirements on collection, storage, and maintenance of records
- b. Make records available on demand for use by Edison or its agent
- c. Inform Edison of any intent to dispose of QA records and permit Edison to take possession of records in accordance with agreed-upon terms.

17.2.18 Audits

Within Edison, the implementation of a comprehensive system of planned and periodic audits is the responsibility of Nuclear QA. Nuclear QA provides a direct audit function of the implementation of the QA program. These audits are performed to verify compliance with all aspects of the QA program, including audits of vendors and service contractors.

17.2.18.1 Audit Personnel

Audit personnel are qualified in accordance with ANSI N45.2.23 and are provided appropriate training to ensure that they are competent to perform the required audits. The proficiency of audit personnel is maintained by active participation in the audit process and by participation in training or orientation programs.

Audits and evaluations of selected subjects may be conducted by using technical specialists from outside the NQA organization. Technical specialists, who occasionally serve as audit team members, will receive indoctrination and training appropriate for the audit function performed.

17.2.18.2 Vendor and Service Contractor Audits

Nuclear QA, supported by technical specialists when appropriate, performs audits, source verification, and commercial grade surveys of vendors and service contractors to verify and evaluate their QA programs, procedures, and/or activities, to ensure that they are meaningful and are effectively complying with all aspects of the QA program and procurement requirements. Nuclear QA also verifies that the vendors and contractors review and audit the QA programs of their suppliers as required.

Nuclear QA performs audits or surveillances of special-purpose inspections, such as inservice inspections, performed by contractors to ensure that the inspection work is being properly performed.

Audits are conducted in accordance with established procedures and by personnel having no direct responsibilities in the areas being audited. Audits, source verifications, and commercial grade surveys performed by other nuclear utilities may be accepted as satisfying Detroit Edison's criteria based on a documented evaluation of the report. The audit results are reported to the Director - Nuclear Quality Assurance, the management of the organization audited, and the affected Edison organizations. Edison requires written reports from each organization on the measures taken to correct deficiencies and prevent recurrence. Appropriate follow-up, including reaudits, is made to determine that nonconformances are effectively corrected and that the corrective action precludes repetitive occurrences.

#### 17.2.18.3 Nuclear Generation Audits

Nuclear QA is responsible for independent audits of Nuclear Generation unit activities to verify compliance with the QA program and to assess its effectiveness. The activities audited include those described in the governing procedures that apply to the plant and onsite support organizations.

Copies of the audit report are distributed to appropriate Nuclear Generation management, including the Senior Vice President - Nuclear Generation, the Director - Nuclear Quality Assurance and affected organizations. The NSRG receives a copy of reports of audits for which the NSRG has responsibility to review.

If a condition adverse to quality is discovered that may affect the safe operation of the plant, it will be brought to the attention of the Plant Manager, in accordance with Subsection 17.2.16. After an audit of an organization has been completed, the appropriate Nuclear Generation manager is responsible for a written report of the corrective action taken in response to any nonconforming conditions identified in the audit report. Appropriate follow-up by Nuclear QA, including reaudits, is made to determine that conditions adverse to quality are effectively corrected and that corrective action precludes repetitive occurrences.

Nuclear QA will verify that the correct revisions of procedures, drawings, and other documents are being used when performing an activity affecting quality. This will be accomplished during inspections, surveillances, and audits.

#### 17.2.18.4 Nuclear Safety Review Group

The NSRG is responsible for review and audit as specified in the Technical Specifications. In addition to these activities, the NSRG will review such other activities as have been established in its charter.

1.93. For discussions of those guides, see the applicable sections of this appendix.

For details refer to Sections 8.2 and 8.3.

A.1.33 REGULATORY GUIDE 1.33 (February 1978, Revision 2),  
QUALITY ASSURANCE PROGRAM REQUIREMENTS (OPERATION)

Fermi 2 is in conformance with the requirements of Regulatory Guide 1.33, with the following exceptions: The Quality Assurance program as described in Subsection 17.2.7 permits the conditional release of material lacking the specified quality assurance records, provided the item can be readily removed. The program allows for functional testing on conditionally released materials that have been installed; however, they will not be placed in service unless a technical evaluation has been performed and documented via a safety evaluation in accordance with 10 CFR 50.59 and in accordance with approved procedures. When differences exist between Regulatory Guide 1.33 and the Technical Specifications, the latter shall take precedence.

SEE 1  
INSERT

Exception is also taken to full compliance with some of the regulatory guides listed in Section C.2 of Regulatory Guide 1.33. The Fermi 2 position on regulatory guides listed in Section C.2 is stated elsewhere in this appendix.

A.1.34 REGULATORY GUIDE 1.34 (December 1972), CONTROL OF  
ELECTROSLAG WELD PROPERTIES

Electroslag welding has been performed only on the turbine shielding wall in the field for Fermi 2. Although Edison specifications did not specifically prohibit it, no use of electroslag welding on core support structures or ASME Class 1 or 2 vessels or components can be identified. Most of those components that would be expected to have electroslag welding were completed and fabricated before this guide was issued.

A.1.35 REGULATORY GUIDE 1.35 (January 1976, Revision 2),  
INSERVICE SURVEILLANCE OF UNGROUTED TENDONS IN PRE-  
STRESSED CONCRETE CONTAINMENT STRUCTURES

This guide does not apply to Fermi 2, which does not use a concrete containment.

A.1.36 REGULATORY GUIDE 1.36 (February 1973), NONMETALLIC  
THERMAL INSULATION FOR AUSTENITIC STAINLESS STEEL

The Fermi 2 design is in conformance with the requirements of this regulatory guide.

For details refer to Subsection 5.2.3.3.