Douglas R. Gipson
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Nuclear Generation

Detroit Edison

Fermi 2
6400 North Dixie Highway
Newport, Michigan 48166
(313) 586-5249

July 26, 1994
NRC-94-0055

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, "Proposed Technical Specification Change (License Amendment) and Quality Assurance Program Change for Audit Program," NRC-93-0079, dated September 13, 1993

Subject: Revision to Quality Assurance Program Change for Audit Program

In Reference 2, Detroit Edison requested a Technical Specification amendment to relocate audit program frequency requirements from Technical Specifications into the licensee submitted Quality Assurance (QA) Program and corresponding changes to the QA Program contained in Section 17.2 of the Fermi 2 Updated Final Safety Analysis Report (UFSAR). The proposal was submitted as a lead plant change with the concurrence of the Great Lakes QA Managers organization.

This letter revises only the proposed QA Program change and does not affect the requested Technical Specification revision. The previously requested allowance for a 25% extension in the audit interval is deleted from the proposal based on discussions between Detroit Edison and Nuclear Regulatory Commission representatives on June 23, 1994. The justification for all other changes remains as presented in Reference 2. Approval of the requested program revision will permit implementation of an important step towards a performance based audit scheduling program.

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The revised proposed QA Program change pages are attached. If there are any questions, please contact Ms. Lynne S. Goodman at (313) 586-4097.

Sincerely,

Attachment

cc: T. G. Colburn
J. B. Martin
M. P. Phillips
K. R. Riemer

PROPOSED

QA PROGRAM

CHANGE

PAGES

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. 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).

o. Fitness for Duty Laboratory at least once every 12 months (specified by regulation).

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 17.2.18 govern the audit program.

L. GOODMAN

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17.2.17.3 Vendor or Contractor QA Records

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. 5

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.

17.2.18.5 Scope and Schedule of Audits

The scope and schedule of audits to be performed will be established by Nuclear QA in coordination with the responsible organizations in accordance with the requirements of the Nuclear QA program. Audit schedules will indicate the activity to be audited and the minimum frequency, and will assign the primary responsibility for the performance of the audit. The audit schedule will be reviewed and revised periodically by Nuclear QA in coordination with the responsible organizations to make certain that coverage and schedule reflect current activities.

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Audits are initiated as early as practicable in the life of the activity, consistent with the schedule for accomplishing the activity, to ensure the timely implementation of QA requirements. Audit scope and schedules are established based on the status and importance of the activities performed to ensure the adequacy of, and conformance with, the Nuclear QA program.

Regularly scheduled audits are supplemented by audits for one or more of the following conditions:

a. When it is necessary to assess the capability of a contractor's QA program before awarding a contract or purchase order

b. When, after the award of a contract, sufficient time has elapsed for implementing the QA program and it is appropriate to determine that the organization is adequately performing the functions as defined in the quality assurance program, codes, standards, and other contract documents

c. When significant changes are made in functional areas of the QA program, such as significant reorganization or procedure revisions

d. When it is suspected that the quality of the item is in jeopardy because of deficiencies in the QA program.

e. When a systematic, independent assessment of program effectiveness is considered necessary

f. When necessary to verify implementation of required corrective action.

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.

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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 PRESTRESSED 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.