

PERRY NUCLEAR POWER PLANT

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United States Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket No. 50-440
10CFR50.54(a)(3) Review Of Changes In Administrative
Controls For Procedures and Instructions

Gentlemen:

Two changes to the administrative process for procedures and instructions are planned for implementation at the Perry Nuclear Power Plant (PNPP). The first proposed change involves use of a systematic review and feedback process for incorporating operating experience into procedures and instructions, to meet the goals of ANSI N18.7-1976 "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants". This dynamic process will be utilized in lieu of a static biennial review process. The second change involves the designation of appropriate review and approval authorities for plant administrative procedures.

Review of these changes is being requested pursuant to the provisions of 10CFR50.54(a)(3), as they are considered to reduce the commitments in the quality assurance program description previously accepted by the NRC. Effects of the commitment reduction are minimal. The proposed methods and existing procedure maintenance/change mechanisms offer equivalent controls for ensuring adequacy of PNPP procedures and instructions.

Attachment 1 to this letter provides the details and bases for the changes. Attachment 2 provides marked-up pages from the Updated Safety Analysis Report. Unless otherwise informed, the proposed changes will be considered approved within 60 days as provided by 10CFR50.54(a)(3)(iv).

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs at (216) 280-5833.

Very truly yours,

BSF:sc

Attachments

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cc: NRC Project Manager
NRC Resident Inspectors Office

Operating Companies
Cleveland Electric Illuminating
Toledo Edison

NRC Region III

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Summary of the First Proposed Change - Biennial Periodic Reviews

The first change applies to the Perry Nuclear Power Plant (PNPP) Updated Safety Analysis Report (USAR) Section 1.8 "NRC Regulatory Guide Assessment". Table 1.8-2 of this section discusses the degree of conformance with various Quality Assurance (QA) related Regulatory Guides and the American National Standards Institute (ANSI) standards they endorse.

This table commits to Regulatory Guide (RG) 1.33 Quality Assurance Program Requirements (Operations) Rev. 2 (2/78) for the Perry Nuclear Power Plant. This Regulatory Guide endorses ANSI N18.7-1976. The subject of the proposed change is the performance of periodic reviews of procedures and instructions as stated in Section 5.2.15 of ANSI N18.7-1976.

ANSI N18.7-1976 Section 5.2.15 states: "In order to ensure that the procedures in current use provide the best possible instructions for performance of the work involved, systematic review and feedback of information based on use is required." In order to meet this goal, it provides guidance that "plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable." PNPP takes exception to the static biennial frequency provision, and instead implements dynamic measures to ensure, on a continual basis, the quality and correctness of procedures and instructions, and that necessary or desirable changes are incorporated.

Details of the Change - Biennial Periodic Reviews

The following details are proposed for insertion into the USAR Table 1.8-2 "Degree of Conformance" column at RG 1.33 (page 1.8-68):

Section 5.2.15 of ANSI N18.7-1976: This section includes a sentence which states "plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable." PNPP takes exception to the static biennial frequency provision, and implements dynamic measures to ensure on a continual basis the quality and correctness of procedures and instructions. A systematic review and feedback process is in place to identify and implement necessary and desirable changes based on:

1. Experience gained from use of procedures and instructions, including documented step-by-step use of certain procedures and instructions.
2. Detailed scrutiny of procedures and instructions as part of training, drills, simulator exercises, qualification, validation/verification, and event critiques.
3. Implementing procedure and instruction changes identified through corrective action program responses, issue investigations, and quality assurance surveillances.
4. Designating procedures and instructions which are affected by plant modifications and changes to design documents.

5. Updating procedures and instructions to implement license amendments, Technical Specification, USAR and QA Plan changes, and the results of operating experience reviews.

Basis for the Change - Biennial Periodic Reviews

As noted above, ANSI N18.7-1976 Section 5.2.15 states: "In order to ensure that the procedures in current use provide the best possible instructions for performance of the work involved, systematic review and feedback of information based on use is required." In order to meet this goal, it provides guidance that "plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable."

The proposed change to the periodic review process offers effective controls to meet the goal of a "systematic review and feedback of information based on use". The proposed change is supported by existing mechanisms which ensure the quality and correctness of procedures and instructions. These mechanisms take place in real time to identify changes and, as such, are responsive to plant needs and changing conditions. This approach is superior to relying on a scheduled periodic review which is static in nature and largely redundant with ongoing procedure and instruction maintenance/change mechanisms.

The NRC has approved this concept at other plants which have established a dynamic process in order to maintain procedures in an accurate and useful condition. Such programmatic controls are considered equivalent to or more effective in meeting the intent of ANSI N18.7-1976 than the static biennial review process.

Listed below are procedurally controlled mechanisms that are established at PNPP and currently account for the identification of the vast majority of changes to procedures and instructions. These controls adequately provide input to procedure and instruction revisions, thereby making the static biennial review process unnecessary for PNPP.

1. Program controls are established to ensure that plant modifications and design changes are reviewed by potentially affected groups prior to implementation. Prior to closure of the modification package, affected procedures and instructions are updated or placed on hold as required by the responsible group.
2. Program controls are established that require plant personnel to either comply with instructions or to make instruction changes when an instruction cannot be performed as written.
3. The industry Operating Experience Review (OER) program has proceduralized controls established that require the review of Information Notices (INs), Significant Operating Experience Reports (SOERs), Operations and Maintenance Reminders (O&MRs), Service Information Letters (SILs), Significant Event Reports (SERs), Vendor notifications and other regulatory and industry information for applicability to Perry, and for the determination of required actions. These reviews include an evaluation of applicable procedures and instructions adequacy as well as requesting necessary changes.

4. The proceduralized Procedure/Instruction Change Request form provides a mechanism for documenting deficiencies or problems, and provides for evaluation and incorporation of required changes into procedures and instructions.
5. Program controls are established requiring Technical Specification amendments and USAR revisions to be evaluated for impact on plant procedures and instructions. Changes are made accordingly.
6. Program controls are established that require formal documentation of drill and exercise critiques (e.g., fire drills, emergency response team drills, medical emergency drills, annual Emergency Plan exercise, etc.). Deficiencies and recommendations noted are reviewed and used to update affected procedures and instructions.
7. Licensed Operator Training, Licensed Operator Requalification Training and Non-Licensed Operator Training make frequent use of procedures and instructions including Off-Normal and Emergency Instructions. Deficiencies and recommendations noted are reviewed and used to update the affected procedures and instructions.
8. The PNPP Corrective Action program, which utilizes Potential Issue Forms (PIFs) to identify areas that do not meet employees expectations, is an effective method of identifying the need for or desirability of changes to plant procedures and instructions.
9. Quality Assurance surveillances of Perry processes and programs are continually performed. Procedure and instruction deficiencies and recommendations noted are reviewed and used to update affected procedures and instructions.
10. BWR Owners Group upgrades to Emergency Procedure Guidelines are implemented after NRC concurrence and internal 10CFR50.59 evaluation.
11. Program controls are established for infrequently performed tests or evolutions.
12. The procedure change program provides for the preparation, review (including 10CFR50.59 reviews), authorization, approval, issuance, and use and control of plant procedure and instruction changes. These processes effectively establish a mechanism to ensure that the review of plant procedures is performed in a manner that maintains the accuracy and quality of revised procedures and instructions, and also ensures that they receive the appropriate departmental reviews.

A key function of PNPP management personnel is to ensure that plant procedures are appropriate and are followed or revised as necessary. In addition, for complex evolutions, PNPP management reviews the integrated plans and associated procedures and instructions, and ensures that post-evolution activities include submitting Procedure/Instruction Change Requests to capture recommended improvements.

In addition to the above dynamic process, several static reviews are performed to meet requirements currently included in the plant Technical Specifications (TS), specifically, annual reviews of the Security Plan and Emergency Plan and their implementing instructions (TS 6.5.3.1.f), and a periodic review of procedures and instructions (TS 6.8.2). The periodic review of procedures and instructions to meet the current Technical Specification requirement will be performed on a four year periodicity, and will be designed to review those procedures and instructions which are not revised or are not reviewed by one of the above described methods over the four year period.

Summary of the Second Proposed Change - PAP Approval by Plant Manager Versus Multiple Department Directors

The second change applies to the approval of procedures. The PNPP Updated Safety Analysis Report Chapter 17.2 states that the department Directors are responsible for approving administrative procedures, in addition to the approval by the General Manager of the Perry Nuclear Power Plant Department (also known as the Plant Manager). This requires the routing of Plant Administrative Procedures (PAPs), which are the higher tier administrative procedures at Perry, to the department Directors for approval signature. The subject of the proposed change is to remove the requirement for the Directors to sign PAP revisions and changes, while retaining the General Manager, PNPPD approval requirement.

Details of the Change - PAP Approval by Plant Manager Versus Multiple Department Directors

The following text changes are proposed for inclusion in various portions of USAR Chapter 17.2:

SECTION 17.2.1.3.2.1 "Perry Departments"

PAGE 17.2-4a

CHANGE The specific responsibilities of the General Manager, PNPPD, and the Directors, include the following: ...

- d. Reviewing and implementing plant administration, operation, testing, repair, maintenance, refueling, health physics, and emergency procedures and instructions as required by the Technical Specifications and this QA Program. The General Manager, PNPPD, is the approval authority for plant administrative procedures.

SECTION 17.2.1.3.2.2 "Perry Nuclear Assurance Department (PNAD)"

PAGES 17.2-10a and -11

CHANGE The specific responsibilities of the Director, PNAD, include the following:

- a. Provide for the preparation and review of procedures and changes thereto, required to implement the requirements of this QA Program.
...
- c. Provide for the review of procedures prepared by other organizations when these procedures control or exercise an effect upon an activity that falls within the scope of this document.

SECTION 17.2.2.2 "Requirements"

PAGE 17.2-19

CHANGE The Operational QA Program requires: ...

d. QA review of procedures and instructions required to implement the QA Program to assure consistency with that program.

SECTION 17.2.5.3.2 "Director, Perry Nuclear Assurance Department"

PAGE 17.2-31

CHANGE The Director, PNAD, is responsible for the review of policies, procedures, and instructions required to implement the quality assurance program to assure consistency with the requirements of that program.

SECTION 17.2.7.3.2 "Director, Perry Nuclear Assurance Department"

PAGE 17.2-38

CHANGE The Director, PNAD, is responsible for the review of Perry procedures for the control of purchased equipment, material and services.

SECTION 17.2.11.3.2 "Director, Perry Nuclear Assurance Department"

PAGE 17.2-47

CHANGE The Director, PNAD, is responsible for the review of test control procedures and instructions for testing activities to be conducted at the plant.

SECTION 17.2.14.3.2 "Director, Perry Nuclear Assurance Department"

PAGE 17.2-53

CHANGE The Director, Perry Nuclear Assurance Department is responsible for maintaining the inspection status... Further, through audits and inspections, and the review of plant administrative control procedures, the Director, PNAD, shall verify...

SECTION 17.2.15.3.2 "Director, Perry Nuclear Assurance Department"

PAGE 17.2-56 and 56a

CHANGE The Director, PNAD is responsible for the identification, documentation and segregation of nonconforming items... Further, through vendor/contractor QA program audits and inspections, and the review of plant administrative control procedures, the Director, PNAD shall verify...

SECTION 17.2.17.3.1 "Director, Perry Nuclear Assurance Department"

PAGE 17.2-62

CHANGE The Director, PNAD, is responsible for the review of the general requirements for the maintenance of quality assurance records; the review of major participating organizations' procedures for the maintenance of Quality Assurance records; establishing...

Basis for the Change - PAP Approval by Plant Manager versus multiple Department Directors

A review of ANSI N18.7-1976 determined there is no regulatory basis for requiring PNPP department Directors to approve Plant Administrative Procedures (PAPs). ANSI N18.7-1976 states in Section 5.2.15 that procedures shall be

approved as designated by the owner organization before initial use. This provision provides discretion in determining appropriate approval authorities for procedures.

Features associated with the proposed change include:

1. The General Manager, PNPPD (also known as the Plant Manager) will be the single approval authority for PAPs.
2. PAP revisions, changes, and cancellations will continue to be reviewed by the responsible departments with comments resolved prior to submitting the document for approval.
3. PNAD will continue to review PAP revisions, changes, and cancellations, and will retain review signature authority on those PAPs required to implement the quality assurance program, to ensure consistency with the requirements of the QA Program.


The above described reviews and approvals will be incorporated into the PAPs which control the administrative procedure process.

The proposed change in the PAP approval process, including the associated features outlined above, offers equivalent controls to Director approval of PAPs. Therefore, sufficient basis exists for discontinuing the practice. A major benefit received from the change will be improved efficiency and timeliness in processing procedure revisions and changes.

Summary

The proposed changes outlined above continue to satisfy the criteria of 10CFR50 Appendix B and the QA Program description in USAR Chapter 17.2. The requirements of 10CFR50 Appendix B Criterion 5, "Instructions, Procedures, and Drawings," and Criterion 6 "Document Control" are fully maintained in USAR Sections 17.2.5 and 17.2.6. The proposed changes provide acceptable alternate methods for ensuring that procedures and instructions remain current and accurate and that procedures are adequately reviewed and approved.

TABLE 1.8-2 (Continued)

<u>Regulatory Guide (Rev.;RRRC Category)</u>	<u>Degree of Conformance</u>	<u>Reference</u>
1.33 (Continued)	used, the activities that were accomplished are documented after-the-fact and receive the same degree of review as if they had been preplanned."	
<p>INSERT A </p>	<p>Section 6.2.1 of ANSI N45.2.4-1972: The last paragraph of this section deals with tagging and labeling. PNPP will comply with an alternate last paragraph which reads: "Each safety-related item of process instrumentation is identified within our Repetitive Task Program. This program maintains a record of calibration status including the date of calibration. The date and the identity of the person performing the calibration is readily available. In certain cases PNPP may also use tags or labels attached to the installed instrumentation to provide this information.</p>	
1.37 - (Revision 0 - 3/73;RRRC Cat. 1)		
Quality assurance requirements for cleaning of fluid systems and associated components of water cooled nuclear plants	For operations, Regulatory Guide 1.37 will be applied to activities comparable in nature and extent to construction phase activities.	4.5, 6.1.1, 10.3.6, 17.2

1.8-68

INSLRT A

Section 5.2.15 of ANSI N18.7-1976: This section includes a sentence which states "plant procedures shall be reviewed by an individual knowledgeable in the area affected by the procedure no less frequently than every two years to determine if changes are necessary or desirable." PNPP takes exception to the static biennial frequency provision, and implements dynamic measures to ensure on a continual basis the quality and correctness of procedures and instructions. A systematic review and feedback process is in place to identify and implement necessary and desirable changes based on:

1. Experience gained from use of procedures and instructions, including documented step-by-step use of certain procedures and instructions.
2. Detailed scrutiny of procedures and instructions as part of training, drills, simulator exercises, qualification, validation/verification, and event critiques.
3. Implementing procedure and instruction changes identified through corrective action program responses, issue investigations, and quality assurance surveillances.
4. Designating procedures and instructions which are affected by plant modifications and changes to design documents.
5. Updating procedures and instructions to implement license amendments, Technical Specification, USAR and QA Plan changes, and the results of operating experience reviews.

17.2.1.3.2.1 Perry Departments

The Operating Organization consists of the Vice President, Nuclear - Perry and four departments and one section whose functions and responsibilities are described in Section 13.1.2.2. The four departments are: The Perry Nuclear Power Plant Department (PNPPD); The Perry Nuclear Assurance Department (PNAD); The Perry Nuclear Services Department (PNSD); and The Perry Nuclear Engineering Department (PNED). The section is the Regulatory Affairs Section (RAS).

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The General Manager, PNPPD, is directly responsible for the safe, efficient, and reliable operation of Perry. The General Manager, PNPPD, and the other department directors are also responsible for the execution of the required administrative controls and the Perry Operational Quality Assurance Program as defined within this chapter. The specific responsibilities of the General Manager, PNPPD, and the Directors, include the following:

- a. Operating Perry in compliance with the requirements of the operating license including Technical Specifications and this QA Program.
- b. Initiating corrective action (including shutdown of the units as required by the Technical Specifications), when operations are not being conducted in accordance with the requirements contained in Item a, above.
- c. Assuring that conditions adverse to quality, when identified, are corrected for all activities involving operations, maintenance, repair, refueling, testing, training, and plant engineering.

- d. Reviewing ~~Approving~~ and implementing plant administration, operation, testing, repair, maintenance, refueling, and instructions emergency procedures ~~as required~~ by the Technical Specifications and this QA Program. The General Manager, PNPPD, is the approval authority for all plant administrative procedures.

The specific responsibilities of the Director, PNAD, include the following:

- Provide for the preparation and*
a. ~~Prepare,~~ review and ~~approve~~ ^{of} procedures and changes thereto,
required to implement the requirements of this QA Program.

- b. Provide for the review and approval of the QA program of contractors providing services, and of vendors supplying materials, parts or components covered by the scope of this document.

- c. Provide for ^{the} review ~~and approval~~ of procedures prepared by other organizations when these procedures control or exercise an effect upon an activity that falls within the scope of this document.

- d. Provide direction and supervision of the PNAD organization.
- e. Maintain a working interface and communication with the NRC, other organizations, consultants, contractors, vendors, and others as required to effectively execute the policies presented in this description of the QA Program.
- f. Provide for a system of planned and periodic audit and inspection of organizations, contractors and vendors performing activities that fall within the scope of this document.
- g. Provide for a system of planned and periodic internal audit to assure the implementation of QA policies, procedures and instructions by organizations addressed in the Operational QA Program.
- h. Establish and assure the continuous implementation of an indoctrination and training program for PNAD QA/QC personnel and assure that a quality assurance indoctrination is provided to appropriate personnel outside the QA organization.
- i. Regularly report to the Vice President, Nuclear - Perry, the status of quality activities, and bring to his attention immediately, any significant quality-related problem or deficiency.

Program is mandatory for all CEI organizations and for all contractors or vendors providing items or services covered under the scope of this document.

Section 17.2 is the primary corporate document describing the Nuclear Quality Assurance Program for Perry. Each of the eighteen criteria of 10 CFR 50 Appendix B, and the responsibilities for the corresponding activities are addressed in detail in the eighteen sections which comprise the document. The requirements of this program shall be implemented in accordance with detailed procedure manuals and instructions.

All procedures and instructions shall be approved and established, with training accomplished, prior to the start of the activity being controlled. Issuance, distribution and revision shall be controlled to preclude the use of obsolete documents.

17.2.2.2 Requirements

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The Operational QA Program requires:

- a. Identification of structures, systems and components to which the Operational Quality Assurance Program is applicable (see Section 3.2).
- b. QA Program controls for computer code programs which affect safety-related items. These controls shall apply to development, access, use, maintenance, and modification of computer code programs. These controls shall include sufficient measures to assure computer code programs will provide accurate output.

- c. Special equipment, environmental conditions, skills or processes to be provided as necessary to safeguard structures, systems and components covered under the scope of this QA Program. Personnel are provided with suitable equipment and tools necessary to perform quality and quality assurance functions required by this program.

- d. QA review ~~and approval~~ of procedures and ~~review of~~ instructions required to implement the QA Program to assure consistency with that program.

- e. Notification to the NRC for review and acceptance prior to implementation of changes in the Quality Assurance Program that reduce commitments previously accepted by the NRC, and notification to the NRC of changes in organizational elements within 30 days after announcement. (The NRC need not be notified of personnel reassignments or editorial changes.)
- f. Commitment to regulatory positions in the appropriate issue of Regulatory Guides as detailed in Table 1.8-2.
- g. The establishment of indoctrination and training programs such that:
 - 1. Personnel responsible for performing activities that fall within the scope of this document are instructed as to the purpose, scope and implementation of the applicable manuals, procedures and instructions.
 - 2. Personnel verifying activities covered under the scope of this document are trained in the principles, techniques and requirements of the activity being performed.

17.2.5.3 Responsibilities and Authorities

17.2.5.3.1 Department General Managers and Directors

Department general managers and directors shall be responsible for the preparation and implementation of procedures, instructions and/or drawings in accordance with the policy and requirements of this section, which direct the performance of activities that fall within the scope of Section 17.2.

17.2.5.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for ^{the} reviewing ^{of} and approving policies and procedures, and ~~shall review~~ instructions required to implement the quality assurance program to assure consistency with the requirements of that program.

17.2.6 DOCUMENT CONTROL

17.2.6.1 Policy

Procedures shall be established and utilized to control those documents which specify, describe or evidence activities covered under the scope of the QA program at Perry.

17.2.6.2 Requirements

As a minimum, written document control procedures shall be established to provide for the control of the following documents:

- a. Quality Assurance Plan.
- b. Administrative Procedures.

Commercial grade items shall be subject to receipt inspection as delineated in 17.2.7.2.1.(d) to provide the necessary assurance that an acceptable item has been furnished. Special quality verification requirements shall be considered when specific quality assurance controls appropriate for nuclear applications cannot be imposed in a practicable manner.

17.2.7.3 Responsibilities and Authorities

17.2.7.3.1 Department General Managers and Directors

Each department general manager or director is responsible for the establishment of procedures to ensure the control of purchased equipment, material and services and for the development and administration of the special service agreements with their agents and consultants.

17.2.7.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for assuring through audit, inspection, source surveillance, and program evaluation techniques, that control of purchased equipment, material and services is established, approved, implemented, and effective.

The Director, PNAD, ^{is responsible for the} ~~reviews and approves~~ ^{of} Perry procedures for the control of purchased equipment, material and services.

- h. Mandatory hold or witness points for inspection by PNAD, the Authorized Nuclear Inspector and/or other designated personnel.
- i. Provisions for control of jumpers, lifted leads and jurisdictional or safety tags.
- j. Provisions for returning a system to normal configuration upon completion of the test.

Test results shall be documented, evaluated and their acceptability determined by a responsible individual or group.

17.2.11.3 Responsibilities and Authorities

17.2.11.3.1 General Manager, PNPPD, and Director, PNED

The General Manager, PNPPD, and Director, PNED, are responsible for conducting test and test control activities at the plant in accordance with approved written procedures which conform to the requirements of this section. The general manager assumes responsibility for test control of each system when that system is accepted from NTS as ready for fuel loading and startup. Startup testing shall be reviewed by the PORC and, if acceptable, a recommendation for approval shall be made to the General Manager, PNPPD, and Director, PNED.

17.2.11.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for ^{the} reviewing ~~and approving~~ ^{cf} test control procedures and ~~reviewing~~ instructions for testing activities to be conducted at the plant. He shall further verify the implementation of test control requirements through the conduct of inspections and audits.

- c. Established inspection and test requirements which shall not be bypassed or have the sequence altered, except by a revision to the inspection or test procedure, or as detailed by approved project procedures/instructions.
- d. Records on the installation or erection, and its inspections and tests, which shall reflect the operating status of systems, structures and components.
- e. Identifying and preventing the inadvertent use of nonconforming, inoperative, or malfunctioning structures, systems or components by documenting the condition and appropriately tagging the item(s).

17.2.14.3 Responsibilities and Authorities

17.2.14.3.1 General Manager, PNPPD; Director, PNED, and Director, PNSD

The General Manager, PNPPD, Director, PNED, and Director, PNSD are responsible for maintaining the test and operating status of plant safety-related structures, systems and components.

17.2.14.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for maintaining the inspection status of plant safety-related structures, systems and components and for the identification and tagging, when applicable, of nonconforming items at the plant. Further, ~~through review and approval~~ ^{and the} of plant administrative control procedures, audits and inspections the Director, PNAD, shall verify the adequate establishment of programs for inspection, test and operating status both at the plant and in the facilities of vendors and contractors as appropriate.

nonconformances, and the timeliness and adequacy of the reporting and resolution of nonconformances. Significant results shall be reported to management for review and assessment.

17.2.15.3 Responsibilities and Authorities

17.2.15.3.1 General Manager, PNPPD; Director, PNED; and Director, PNSD

The General Manager, PNPPD; Director, PNED; and Director, PNSD are responsible for identifying, controlling, assisting in providing dispositions, and resolving nonconforming items at the plant in accordance with written approved procedures which conform to the requirements of this section. In addition, the General Manager, PNPP, and Director, PNED, are responsible for analyzing and trending failures of plant equipment.

Additionally, the Director, PNED, is responsible for providing technical reviews of nonconformances, obtaining information from responsible design organizations, and assisting in developing dispositions to nonconformances when requested.

17.2.15.3.2 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for the identification, documentation, and segregation of nonconforming items at the plant. This director is responsible for reviewing nonconformance dispositions for adequacy, providing approval, performing inspection of replacement, reworked or repaired items, and closeout of nonconformances generated at the plant. Further, through review and approval of plant administrative

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control procedures and vendor/contractor QA program audits and inspections, the Director, PNAD, shall verify the adequate implementation of nonconformance control both at the plant and in the

facilities of vendors and contractors. The Director, PNAD, is responsible for the performance and reporting of periodic quality trend analysis of nonconformances.

17.2.16 CORRECTIVE ACTION

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17.2.16.1 Policy

Measures shall be established which ensure that conditions adverse to quality, such as malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances be identified promptly and corrected. The cause of significant conditions adverse to quality shall be determined and corrective action shall be taken to preclude repetition. The identification, cause and actions taken to correct conditions adverse to quality shall be documented and reported to the appropriate levels of management.

Significant conditions as delineated in 10 CFR 50.72 or 10 CFR 21 shall be reported to appropriate management levels within the affected organization.

17.2.16.2 Requirements

Procedures shall be established which detail and implement at least the following corrective action system measures:

- a. Conditions adverse to quality shall be corrected and shall be evaluated as to the significance of the condition.
- b. Significant conditions adverse to quality shall have action taken to prevent recurrence.

- g. Documented measures shall be established to assure retrievability of records and to preclude their loss by such means as duplicate files, microfilming, etc.

17.2.17.3 Responsibilities and Authorities

17.2.17.3.1 Director, Perry Nuclear Assurance Department

The Director, PNAD, is responsible for ~~approving~~ ^{the review of} the general requirements for the maintenance of quality assurance records; ~~reviewing~~ ^{the} ~~and approving~~ ^{of} major participating organizations' procedures for the maintenance of Quality Assurance records; establishing a program for the identification, storage, retrieval, and maintenance of Quality Assurance records including indexing, permanent storage, maintenance, and retrievals; and performing planned and periodic audits to verify adequacy and implementation of QA record requirements by both internal organizations and external suppliers.