

NRC Regulatory Guide 1.33 - "Quality Assurance Program Requirements (Operation)" (Rev. 2, 2/78) - Endorses ANSI N18.7 - 1976.

The Operational Quality Assurance Program complies with the requirements of this Guide with the following clarifications:

- 1) Paragraph C.3 of Regulatory Guide 1.33 (and Section 4.3.4 of ANSI N18.7 which it references) will be implemented as required by the applicable nuclear facility Technical Specifications which define "Subjects Requiring Independent Review."
- 2) Paragraph C.4 ("Audit Program") of Regulatory Guide 1.33 (and Section 4.5 of ANSI N18.7 - 1976 which it references).

Audit frequencies will be implemented as required by the applicable Code of Federal Regulations, Updated Final Safety Analysis Report, and commitments by various correspondence to the NRC. All other audit frequencies will be based on performance results and importance of the activity relative to safety determined in accordance with the performance-based audit scheduling program. The scheduling program, through an expert panel, uses assessment indicators to identify and schedule audits based on performance results and importance of the activity relative to safety. Potential audit subject areas are periodically assessed against appropriate performance criteria. From these reviews a determination is made in regard to the depth, scope and scheduling of specific audits. Functional areas important to safety are assessed annually (+25%) to identify strengths and weaknesses (if applicable) to determine the level and focus of independent oversight activities for the upcoming year. The basis for the assessment shall include the results of QA audits and surveillance, NRC inspections, LERs (License Event Reports), self-assessments, and applicable condition reports (for example, nonconformance and corrective action reports). Personnel changes, change/increase in functional area responsibilities, industry operating experience, and INPO evaluations may will also be considered. Each area will be assigned a rating with a comparison to previous years. This assessment will be documented, reviewed and approved by QA Management. This document is considered a QA record and will be available for NRC review. Audit subject areas contained in Technical Specifications Section 6.5.2.8 prior to implementation of the Improved Technical Specifications in March, 1995 shall continue to be audited on the frequencies previously designated in the Technical Specifications unless expert panel judgment, based on performance results determines, such an audit to be unnecessary. In such cases the expert panel basis shall be documented.

- 3) Paragraph C.5.a of Regulatory Guide 1.33 (and Section 4.4 of ANSI N18.7 which it references) will be implemented with the clarification that the Plant Safety Review Committee shall perform this activity.