

Omaha Public Power District
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402/636-2000

December 11, 1992
LIC-92-0321

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Mail Station P1-137
Washington, DC 20555

Reference: Docket 50-285

Gentlemen:

SUBJECT: Revision to the Fort Calhoun Station Quality Assurance Program
Related to ANSI N18.7 - 1976

In accordance with 10 CFR 50.54(a)(3) Omaha Public Power District (OPPD) is requesting NRC approval of the attached revision to the Fort Calhoun Station Quality Assurance Program contained in Appendix A of the Updated Safety Analysis Report (USAR). The revision modifies a commitment to ANSI N18.7 - 1976 Section 5.2.15 concerning the frequency of procedure reviews. OPPD proposes to revise the commitment to this requirement by replacing the biennial review process with an alternative commitment to review procedures upon identification of new or revised source material that potentially could affect the procedures. It has been determined that this revision is a reduction to our previous commitment, and therefore requires NRC approval prior to implementation. The requirements of 10 CFR 50 Appendix B will continue to be met with the implementation of this revision.

Attachment A provides a description and justification for the proposed change, and Attachment B contains the marked-up page of Appendix A of the USAR, indicating the proposed revision.

In addition to the QA Plan, OPPD has committed to the NRC to conduct biennial procedure reviews in response to various issues, such as Safety Enhancement Program Item No. 44. If the proposed revision to the QA Plan is approved, OPPD will consider these commitments to be revised also. If you should have any questions, please contact me.

Sincerely,

W. G. Gates
W. G. Gates
Vice President

WGG/brh

Attachments

c: LeBoeuf, Lamb, Leiby & MacRae
J. L. Milhoan, NRC Regional Administrator, Region IV
R. P. Mullikin, NRC Senior Resident Inspector
S. D. Bloom, NRC Project Manager

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W. G. Gates
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ATTACHMENT A

IDENTIFICATION OF CHANGE

OPPD wishes to revise a commitment to ANSI N18.7 - 1976 contained in Appendix A of the Fort Calhoun Station Updated Safety Analysis Report (USAR) related to the frequency of procedure reviews. ANSI N18.7 - 1976 Section 5.2.15 requires that procedures be reviewed no less frequently than every two years (i.e. biennial review) or prior to usc, whichever is less frequent.

OPPD proposes to revise the commitment to this requirement by replacing the biennial review process with an alternative commitment to review procedures upon identification of new or revised source material that potentially could affect the procedures.

REASON FOR CHANGE

Fort Calhoun Station has approximately 4000 procedures that are included in the biennial procedure review program. Maintaining these procedures in an accurate and useful condition is a dynamic process. The need for changes may be identified through various mechanisms and at various times. Such changes must be evaluated for implementation at the time of identification. Requiring a static review process, such as the biennial review currently in ANSI N18.7 - 1976, in addition to the dynamic process, does not add value commensurate with the resources required.

BASIS FOR CONCLUSION THAT THE CHANGE SATISFIES 10 CFR PART 50, APPENDIX B

OPPD initiated a Procedure Upgrade Project to conduct a detailed technical review and verification of Station procedures to incorporate industry practices and human factors. All safety related procedures have been verified, validated and issued; non-safety related procedures are currently being reviewed.

Additionally, OPPD has established programs for evaluating the need for, and the timing of, procedure changes to ensure procedures are maintained in an accurate and current condition. Listed below are key examples of administratively controlled processes that have been established at the Fort Calhoun Station which are used to identify potential procedure changes.

- Plant Modification Program - The plant modification program incorporates a review of all modifications by a multi-disciplinary Plant Review Committee approved team, to identify the need for procedure revisions. Affected procedures are revised either prior to acceptance for operability or final acceptance of the modification. [Standing Order G-21, "Modification Control."]
- Procedural compliance - It has been established that plant personnel will comply with procedures verbatim and will make procedure changes when a procedure cannot be implemented as written. [Standing Order O-1, "Conduct of Operations," Safety Enhancement Program Item No. 44.]

- Operating Experience Review Program - The operating experience review program, which includes NRC Bulletins, Notices and Generic Letters, Part 21's, along with INPO Significant Operating Experience Reports, Significant Event Reports and other documents from INPO includes requirements to review procedures for possible enhancement. This program implements NUREG-0737 Item I.C.5, "Procedures for Feedback of Operating Experience to Plant Staff." [Nuclear Operations Division Quality Procedure No. 21, "Operating Experience Review Program (OER)."]
- Vendor Manual Program - Fort Calhoun Station has implemented a program to ensure receipt of vendor bulletins and notices. This information is evaluated for applicability. This is a requirement of Generic Letters 83-28 and 90-03. [Standing Order G-62, "Control of Vendor Manuals."]
- Issuance of License Amendments - Evaluation of changes to the Operating License and Technical Specifications includes mechanisms to review and identify necessary procedure revisions. [Nuclear Operations Division Quality Procedure No. 7, "Facility License Changes (FLCs)," Safety Enhancement Program Item No. 60.]
- Security and Emergency Plans - Technical Specification 5.5.2.8 requires periodic independent review of the Security Plan, Safeguards Contingency Plan, and the Emergency Plan along with the implementing procedures for these programs.
- Infrequently Performed Procedure Program - Fort Calhoun Station has a program for the implementation of infrequently performed procedures to ensure these procedures are properly planned, reviewed and implemented. [Standing Order G-92, "Conduct of Infrequently Performed Procedures."]
- Corrective Action Program - Fort Calhoun Station's corrective action program includes Corrective Action Reports, Incident Reports, the Human Performance Enhancement System, Licensee Event Reports and other documents that identify plant problems. These are reviewed to determine the cause and corrective actions required to resolve the concern. [Quality Assurance Manual Procedure 20, "Control of Internal Deficiencies and Corrective Action," Standing Order R-4, "Station Incident Reports," Nuclear Operations Division Quality Procedure No. 20, "Human Performance Enhancement System Program (HPES)."]
- Ongoing Commitment Program - Ensures commitments made to the NRC as corrective actions to Violations, LER's, Generic Letters, and other NRC correspondence which detail procedural or administrative actions are not inadvertently deleted. [Nuclear Operations Division Quality Procedure No. 34, "Ongoing Commitment Program," and Standing Order G-30, "Setpoint Procedure Changes and Generation."]

- Surveillance Test Program - The Surveillance Test Program requires that anomalies and deficiencies be reported. [Standing Order G-23, "Surveillance Test Program."]

Based on implementation of the above programs, the requirement contained in ANSI N18.7 - 1976 to provide a systematic review of procedures will continue to be met without requiring an additional biennial procedure review. Therefore, CPPD has concluded that the requirements of 10 CFR Part 50, Appendix B, Section V, will continue to be met.

ATTACHMENT B

- B. Standard: ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operations Phase of Nuclear Power Plants"

Regulatory Guide: RG 1.33, Revision 2, "Quality Assurance Program Requirements (Operations)"

Position: OPPD's QA Program and QA Plan comply with the applicable requirements of this standard and Regulatory Guide with the following alternatives or exceptions:

1. Preoperational testing of Fort Calhoun Station is completed, therefore, these requirements are implemented only to the extent required by the Station Technical Specifications and as applicable to preoperational testing associated with station modification activities and post-maintenance testing.
2. OPPD's audit program is a four-tiered program consisting of (1) regularly scheduled internal and external audits conducted on a 3 year cycle by the Quality Assurance & Quality Control Department, (2) regularly scheduled QA surveillances conducted by the Quality Assurance & Quality Control Department, (3) scheduled audits performed by or under the cognizance of, the Safety Audit and Review Committee in accordance with the Station Technical Specifications, and (4) a management review to determine the adequacy and effectiveness of OPPD's Quality Assurance Program performed under the auspices of the Safety Audit and Review Committee.
3. OPPD uses a dynamic procedure review process instead of a static two year review cycle to prevent the use of outdated or inappropriate documents. This dynamic process ensures applicable procedures and instructions are reviewed for possible revision upon the identification of new or revised source material.

- C. Standard: ANSI N45.2.1-1973, "Cleaning of Fluid Systems and Associated Components During the Construction Phase of Nuclear Power Plants"

Regulatory Guide: RG 1.37, Revision 0, "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water Cooled Nuclear Power Plants"

Position: OPPD's QA Program and QA Plan comply with the applicable requirements of this standard and Regulatory Guide to the extent that these requirements apply to activities affecting quality performed in the operations phase of the Fort Calhoun Station as delineated in OPPD's QA Plan.

- D. Standard: ANSI N45.2.2-1972, "Packaging, Shipping, Receiving, Storage and Handling of Items for Nuclear Power Plants (During the Construction Phase)"

Regulatory Guide: RG 1.38, Revision 2, "Quality Assurance Requirements for Packaging, Shipping, Receiving, Storage and Handling of Items for Water Cooled Nuclear Power Plants"

Position: OPPD's QA Program and QA Plan comply with the requirements of this standard and Regulatory Guide to the extent that these requirements apply to activities affecting quality performed in the operations phase of Fort Calhoun Station.

- B. Standard: ANSI N18.7-1976, "Administrative Controls and Quality Assurance for the Operations Phase of Nuclear Power Plants"

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