



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 21, 1992

MEMORANDUM FOR: M. Wayne Hodges, Director
Division of Reactor Safety
Region I

Albert F. Gibson, Director
Division of Reactor Safety
Region II

Hubert J. Miller, Director
Division of Reactor Safety
Region III

Samuel J. Collins, Director
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Region IV

Kenneth E. Perkins, Director
Division of Reactor Safety & Projects
Region V

FROM: Charles E. Rossi, Director
Division of Reactor Inspection
and Licensee Performance
Office of Nuclear Reactor Regulation

SUBJECT: BIENNIAL PROCEDURE REVIEWS

By memoranda dated September 27, 1991, and March 3, 1992, your comments were requested regarding proposed guidance for reviewing licensee-requested changes to quality assurance programs concerning biennial procedure reviews. We have considered your responses and incorporated them, as appropriate, into this memorandum. The purpose of this memorandum is to issue the resulting guidance for reviewing licensee-requested changes in this quality assurance program area. NRC Committee for the Review of Generic Requirements (CRGR) staff member comments have also been incorporated into this guidance.

Licensees typically commit to one of the different versions of ANSI/ANS Standards N18.7 and 3.2. Regulatory Guide (RG) 1.33, "Quality Assurance Program Requirements (Operational)," endorses ANSI N18.7-1976/ANS 3.2 and its requirement that "Plant procedures shall be reviewed... no less frequently than every two years." (Section 5.2.15). Each version of the standard states that the frequency of subsequent reviews shall be specified and may vary depending on the complexity of the activity involved and may vary with time as a given plant reaches operational maturity. In addition, each version of the standard requires that applicable procedures be reviewed following a modification to a system and following an unusual incident such as an accident, an unexpected transient, a significant operating error, or an equipment malfunction. These

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ENCLOSURE

Plant Procedure Review Guidance

Programmatic controls should specify that all applicable plant procedures will be reviewed following an unusual incident, such as an accident, an unexpected transient, significant operator error, or equipment malfunction and following any modification to a system, as specified by Section 5.2 of ANSI 3.7/ANS 3.2 which is endorsed by RG 1.33.

Non-routine procedures (procedures such as emergency operating procedures, off-normal procedures, procedures which implement the emergency plan, and other procedures whose usage may be dictated by an event) should be reviewed at least every two years and revised as appropriate.

At least every two years, the Quality Assurance (or other "independent") organization should audit a representative sample of the routine plant procedures that are used more frequently than every two years. The audit is to ensure the acceptability of the procedures and verify that the procedure review and revision program is being implemented effectively. The root cause of significant deficiencies is to be determined and corrected.

Routine plant procedures that have not been used for two years should be reviewed before use to determine if changes are necessary or desirable.