

Detroit
Edison

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10CFR50.90

December 13, 1996
NRC-96-0125

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) NUREG 1433, "Standard Technical Specifications for General Electric Plants, BWR/4", dated January 1991
 - 3) Generic Letter 93-07, "Modification of the Technical Specification Administrative Control Requirements for Emergency and Security Plans," dated December 28, 1993
 - 4) Federal Register Notice - Volume 58, No. 245, "...Technical Specifications on Effluents from Nuclear Power Reactors," dated December 23, 1993
 - 5) BWOG - 09, Revision 0, "Improved Standard Technical Specification Change Traveler", dated January 30, 1994
 - 6) NRC letter from William T. Russell to the Owners Group Chairpersons of the Improved Standard Technical Specifications (STE) Committees, dated October 25, 1993
 - 7) Federal Register Notice - Volume 59, No. 181, "Technical Specifications," dated September 20, 1994
 - 8) Detroit Edison Letter to NRC, NRC 93-0079 "Proposed Technical Specification Change (License Amendment) and Quality Assurance Program Change for Audit Program", dated September 13, 1993
- 170001
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- 9) Generic Letter 87-07, "Information Transmittal of Final Rulemaking for Revisions to Operator Licensing-10CFR 55 and Conforming Amendments," dated March 19, 1987
- 10) Draft Generic Letter, "Guidance for Modification of Technical Specifications to reflect ..., 'Technical Specifications on Effluents from Nuclear Power Reactors',..., " date filed December 22, 1993 (FR Doc. 93-31335)
- 11) Detroit Edison Letter to NRC, "Proposed Technical Specification Change (License Amendment) for Administrative Controls", NRC-94-0107, dated December 15, 1994
- 12) NRC Administrative Letter (AL) 95-06, "Relocation of Technical Specification Administrative Controls Related to Quality Assurance"; dated December 12, 1995
- 13) NRC Letter to Detroit Edison, "Proposed Changes to Administrative Controls Section of the Fermi 2 Technical Specifications", dated January 24, 1996
- 14) Detroit Edison Letter to NRC, "Revision to Proposed Technical Specification Change (License Amendment) for Administrative Controls, NRC-96-0064, dated July 25, 1996

Subject: Additional Information for Proposed Technical Specification Change on Administrative Controls (TAC No. M91189)

On December 15, 1994, Detroit Edison proposed a License Amendment (Reference 11) to change the administrative controls Section 6.0 of the Fermi 2 Technical Specifications (TS). On July 25, 1996 Detroit Edison (Reference 14) modified the proposed TS change to be consistent with AL 95-06, the Improved Standard TS (ISTS) and pending changes to the ISTS. Detroit Edison is submitting this letter to:

- 1) Provide a copy of the changes to the Quality Assurance Program (QAP) that will become effective when this TS amendment is approved and implemented as agreed to in Reference 13.
- 2) Provide a matrix or cross reference table to clearly indicate the new location of administrative controls being relocated from Section 6.0.
- 3) Address the reporting relationship of the Independent Safety Engineering Group (ISEG). Section 6.2.3.4 currently states:

"The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the Vice President Nuclear Engineering and Services."

Reference 13 stated that Detroit Edison would relocate the ISEG requirement intact, however, after further consideration Detroit Edison plans to revise this section concurrently with the relocation.

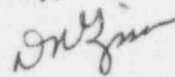
The ISEG TS requirement will be relocated from the TS to the QAP intact with exception of the following change:

"The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the **Manager, Nuclear Assessment**."

The Vice President Nuclear Engineering and Services position was vacated and no longer exists. The Manager, Nuclear Assessment position was created in 1995. The Manager, Nuclear Assessment reports directly to the Senior Vice President Nuclear Generation as did the Vice President Nuclear Engineering and Services. Detroit Edison does not consider this a reduction of commitment because the Nuclear Assessment Manger reports directly to the Senior Vice President Nuclear Generation as did the Vice President Nuclear Engineering and Services.

Additionally included as Attachment 1 to this letter is a matrix which indicates the new location of administrative controls relocated from section 6.0 by the proposed TS change. If you should have any questions concerning this submittal please contact Joseph M. Pendergast, Licensing Engineer at (313) 586-1682.

Sincerely,



Attachments

cc: A. B. Beach
M. J. Jordan
A. J. Kugler
A. Vogel
Region III
Supervisor, Electric Operators, Michigan
Public Service Commission - J. R. Padgett

RELOCATION CROSS-REFERENCE MATRIX

Current Section 6 Topic	New Location
TS 6.2.2.f - Administrative Controls on Working Hours	TS 6.8.6 - Procedures and Programs
TS 6.2.3.4 - ISEG Requirements	QAP
TS 6.3 - March 29, 1980 NRC Letter	Change does not involve relocation
TS 6.4 Training requirements	Change does not involve relocation
TS 6.5 - Review and Audit	QAP
TS 6.6.1.b - Reportable Event and Review	QAP
TS 6.5 OSRO Requirements	QAP
TS 6.5.1.6.j - OSRO review of the Security Plan	Fermi 2 Security Plan
TS 6.8.1.e - Security Plan Implementation	Security Plan
TS 6.5.1.6.k - OSRO review of the Emergency Plan	Emergency Plan
TS 6.8.1.f - Emergency Plan implementation Procedures requirement	Emergency Plan
TS 6.8.2 - Review and approval process for administrative procedures	QAP
TS 6.8.1 - Review and approval for each plant procedure	QAP
TS 6.8.3 - Review and approval process for administrative procedures	QAP
TS 6.8.1 - Review and approval process for temporary changes	QAP
TS 6.8.4 -	QAP
TS 6.8.5.b - In Plant Radiation Monitoring Program	Chapter 12 UFSAR
TS 6.8.5.f - Radiological Environmental Monitoring Program	Chapter 11 UFSAR
TS 6.10 - Record retention requirements	QAP
TS 6.11 - Radiation Protection Program	Chapter 13 UFSAR
TS 6.12 - High radiation area	Previously requested change withdrawn by Reference 14
TS 6.13 - Process Control Program	QAP
TS 6.9.1.8 - Requirement for the Annual Radioactive Effluent Release Report (i.e., "...within 90 days after January 1...")	Change does not involve relocation

**Quality Assurance Program
Changes**

17.2.1.5.4 Director - Nuclear Training

The Director - Nuclear Training is responsible for developing and implementing training programs in support of the safe and efficient operation of the plant.

The training program is described in Section 13.2.

17.2.1.6 Manager - Administration/Executive Council Staff (ECS)

The responsibilities of the Manager - Administration/ECS are described in Subsection 13.1.1. Reporting to the Manager - Administration/ECS is the Director - General Purchasing.

Inspection and Delivery Services - General Purchasing

The Inspection and Delivery Services group within the General Purchasing Department may assist Nuclear Generation by providing qualified personnel to perform vendor surveillance and source inspections under the direction of Supervisor - Material Engineering and Support.

17.2.1.7 Review and Audit Organizations

The membership, meeting frequency, minutes, quorum, and other details of the NSRG and the OSRO are described in this subsection and in Section 13.4. These review and audit organizations, which provide a technical review of plant maintenance and operation, have been established in accordance with the below listed criteria. The membership of the NSRG and the OSRO will be supplemented by Edison personnel or consultants as necessary.

17.2.1.7.1 Onsite Review Organization (OSRO)

17.2.1.7.1.1 Function

The OSRO shall function to advise the Plant Manager on all matters related to nuclear safety as described in Subsection 17.2.1.7.1.6.

17.2.1.7.1.2 Composition

The OSRO chairman shall be the Plant Manager and the membership shall be composed of a minimum of 6 but not more than 11 plant management representatives whose responsibilities include the functional areas of: operations, maintenance, radiation protection, engineering/technical support and quality assurance. All members shall be appointed in writing by the OSRO Chairman. The qualifications of each OSRO member shall meet or exceed the requirements and recommendations of Section 4.2 or 4.3 of ANSI N18.1-1971.

17.2.1.7.1.3 Alternates

The Chairman may designate in writing other members who may serve as the Vice Chairman of the OSRO. Alternates may be designated for specific OSRO members. No more than two alternates shall participate as voting members in OSRO activities at any one time. All alternate members shall be appointed in writing by the OSRO Chairman.

17.2.1.7.1.4 Meeting Frequency

The OSRO shall meet at least once per calendar month and as convened by the OSRO Chairman or a Vice Chairman.

17.2.1.7.1.5 Quorum

The quorum of the OSRO necessary for the performance of the OSRO responsibility and authority provisions of this section (17.2.1.7.1) shall consist of the Chairman or Vice Chairman and four members including alternates.

17.2.1.7.1.6 Responsibilities

The OSRO shall be responsible for:

- a. Review of all Plant Administrative Procedures and changes thereto;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. Review of the safety evaluations for plant procedures and changes thereto completed under the provisions of 10 CFR 50.59;
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Senior Vice President - Nuclear Generation and to the Nuclear Safety Review Group;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;

- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Nuclear Safety Review Group;
- j. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Senior Vice President - Nuclear Generation and to the Nuclear Safety Review Group; and
- k. Review of changes to the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, and major modifications to the Radwaste Treatment Systems.
- l. Review of the Fire Protection Program.

17.2.1.7.1.7 Reportable Event Action

Each REPORTABLE EVENT shall be reviewed by the OSRO, and the results of this review shall be submitted to the NSRG and the Senior Vice President - Nuclear Generation.

17.2.1.7.1.8 The OSRO shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Subsection 17.2.1.7 1.6a through d. prior to their implementation.
- b. Render determinations in writing to the Nuclear Safety Review Group with regard to whether or not each item considered under Subsection 17.2.1.7.1.6a through f. constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Senior Vice President - Nuclear Generation and the Nuclear Safety Review Group of disagreement between the OSRO and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Technical Specification 6.1.1.

17.2.1.7.1.9 Records

The OSRO shall maintain written minutes of each OSRO meeting that, at a minimum, document the results of all OSRO activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the Senior Vice President - Nuclear Generation and the Nuclear Safety Review Group.

17.2.1.7.2 NUCLEAR SAFETY REVIEW GROUP (NSRG)

17.2.1.7.2.1 FUNCTION

The NSRG shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological controls,
- g. Mechanical and electrical engineering, and
- h. Quality assurance practices.

The NSRG shall report to and advise the Senior Vice President - Nuclear Generation on those areas of responsibility in Subsections 17.2.1.7.2.7 and 17.2.1.7.2.8.

17.2.1.7.2.2 Composition

The Senior Vice President - Nuclear Generation shall appoint at least nine members to the NSRG and shall designate from this membership a Chairman and at least one Vice Chairman. The membership shall collectively possess experience and competence to provide independent review and audit in the areas listed in Subsection 17.2.1.7.2.1. The Chairman and Vice Chairman shall have nuclear background in engineering or operations and shall be capable of determining when to call in experts to assist the NSRG review of complex problems. All members shall have at least a bachelor's degree in engineering or related sciences or at least 10 years of responsible power plant experience of which a minimum of 3 years shall be nuclear power plant experience. The Chairman shall have at least 10 years of professional level management experience in the power field and each of the other members shall have at least 5 years of cumulative professional level experience in one or more of the fields listed in Subsection 17.2.1.7.2.1.

17.2.1.7.2.3 Alternates

All alternate members shall be appointed in writing by the NSRG Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NSRG activities at any one time.

17.2.1.7.2.4 Consultants

Consultants shall be utilized as determined by the NSRG Chairman to provide expert advice to the NSRG.

17.2.1.7.2.5 Meeting Frequency

The NSRG shall meet at least once per 6 months.

17.2.1.7.2.6 Quorum

The quorum of the NSRG necessary for the performance of the NSRG review and audit functions of the Technical Specifications shall consist of the Chairman or his designated alternate and at least one half of the remaining NSRG members of whom two may be alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

17.2.1.7.2.7 Review

The NSRG shall be responsible for the review of Subsection 17.2.1.7.2.7a and shall review Subsection 17.2.1.7.2.7b through i:

- a. The safety evaluations for (1) changes to procedures, equipment, facilities or systems and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;
- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the OSRO.

17.2.1.7.2.8 Audits

Audits of unit activities shall be performed under the cognizance of the NSRG. These audits shall encompass topics listed in Subsection 17.2.18.5.

17.2.1.7.2.9 RECORDS

Records of NSRG activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRG meeting shall be prepared, approved, and forwarded to the Senior Vice President - Nuclear Generation within 14 days following each meeting.
- b. Reports of reviews encompassed by Subsection 17.2.1.7.2.7 shall be prepared, approved, and forwarded to the Senior Vice President - Nuclear Generation within 14 days following completion of the review.
- c. Audit reports encompassed by Subsection 17.2.1.7.2.8 shall be forwarded to the Senior Vice President - Nuclear Generation and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

17.2.1.7.3 Independent Safety Engineering Group (ISEG)

17.2.1.7.3.1 Function

The ISEG shall function to examine unit operating characteristics, NRC issuances, industry advisories, Licensee Event Reports, and other sources of plant design and operating experience information, including plants of similar design, which may indicate areas for improving unit safety.

17.2.1.7.3.2 Composition

The ISEG shall be composed of at least five dedicated, full-time engineers located onsite, each with a bachelor's degree in engineering or related science and at least two years professional level experience in his field, at least one year of which experience shall be in the nuclear field.

17.2.1.7.3.3 Responsibilities

The ISEG shall be responsible for maintaining surveillance of unit activities to provide independent verification (not responsible for sign-off function) that these activities are performed correctly and that human errors are reduced as much as practical.

17.2.1.7.3.4 Authority

The ISEG shall make detailed recommendations for revised procedures, equipment modifications, maintenance activities, operations activities or other means of improving unit safety to the Nuclear Assessment Manager.

17.2.2 Nuclear Quality Assurance Program

The Nuclear QA program established for plant operations applies to all quality-related activities associated with the structures, systems, and components identified as safety related. The program is designed to comply with the requirements of Appendix B to 10 CFR 50, NRC regulatory guides, and the endorsed ANSI standards that are used in structuring the program and in developing procedures to implement it. In all cases the required implementation procedures are established before the initiation of a given activity and must comply with the governing QA program.

Application of the 10 CFR 50, Appendix B QA program to activities conducted under 10 CFR 71 is limited to procurement, maintenance, repair and use of transportation packages for shipment of radioactive materials. Design, fabrication, assembly, and modification of shipping casks will not be conducted under this QA program.

17.2.2.1 Corporate QA Policies, Goals, and Objectives

The Senior Vice President - Nuclear Generation has the ultimate authority for establishing QA policy. He is assisted by the Nuclear Assessment Manager and the Director - Nuclear Quality Assurance in establishing goals and objectives.

Assurance Program with the exception that some source verifications are performed by QA.

Documentation resulting from engineering evaluations and hardware verifications is designed to be auditable and become permanent plant procurement records. It may also be used to replicate generic or specific engineering evaluations during subsequent procurements.

Nuclear QA will ensure that such requirements are included in the detailed procedures. Independent audits by Nuclear QA will ensure compliance with the established procedures.

17.2.5 Instructions, Procedures, and Drawings

Activities affecting quality are performed in accordance with approved instructions, procedures, or drawings. These documents include the necessary limits and tolerances on materials, equipment, processes, and procedures for all activities from design through operation. Also included are qualitative or quantitative acceptance criteria to ensure that important operations have been accomplished satisfactorily. The basis for determining the need for procedures and their content is consistent with the requirements of ANSI N18.7-1976 and Regulatory Guide 1.33 as addressed in Subsection A.1.33.

Documents established to ensure that activities affecting quality are accomplished in accordance with applicable codes, standards, specifications, and drawings include the following:

- a. Fermi Conduct Manuals, including administrative implementing procedures and NQA procedures
- b. Technical procedures, including, but not limited to:
Operating procedures, radiation protection procedures, maintenance and modification procedures, periodic calibration and test procedures, special test procedures, and fuel handling procedures.

Nuclear Generation unit supervisors are responsible for ensuring compliance to procedures by personnel under their direction. Independent auditing by Nuclear QA will further ensure and verify onsite compliance with the approved procedures. The activities of Edison support organizations and vendors or contractors are also audited by Nuclear QA to verify compliance with requirements.

17.2.5.1 Technical Review and Control

17.2.5.1.1 Activities

Procedures required by Technical Specification 6.8, and other procedures which affect plant nuclear safety as determined by the Plant Manager, and changes thereto, shall be prepared by a qualified individual/organization.

17.2.5.1.2 Review

17.2.5.1.2.1

Each procedure or procedure change prepared in accordance with 17.2.5.1.1 above and not reviewed in accordance with 17.2.1.7.1.6 shall be reviewed for technical adequacy by a qualified individual other than the individual that prepared the procedure or change thereto. Each such review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review(s) shall be performed by personnel of the appropriate discipline.

17.2.5.1.2.2

Each procedure required by Technical Specification 6.8.1.h through j, or changes thereto, shall be reviewed by the Superintendent-Radiation Protection or his designee. The Environmental Program Coordinator (an alternate title may be designated for this position) will review any changes pertaining to Technical Specification 6.8.1.j. These reviews may be performed in lieu of, or in addition to, those required by 17.2.5.1.2.1.

17.2.5.1.3 Safety Evaluations

When required by 10 CFR 50.59, a safety evaluation to determine whether or not an unreviewed safety question is involved shall be included in the review. Pursuant to 10 CFR 50.59, NRC approval of items involving unreviewed safety questions shall be obtained prior to approval of the procedure or procedure change.

17.2.5.1.4 Qualifications

Individuals performing the reviews and evaluations in accordance with 17.2.5.1.2.1 through 17.2.5.1.3 above shall meet or exceed the qualifications stated in Sections 4.2 or 4.4 of ANSI N18.1-1971 for the appropriate discipline, and shall be members of the plant staff previously designated in writing by the Plant Manager.

17.2.5.1.5 Records

Written records of reviews and evaluations performed in accordance with items 17.2.5.1.2.1 through 17.2.5.1.3 above, including recommendations for approval or disapproval, shall be prepared and maintained.

17.2.5.2 Review and Approval Process and Temporary Change Process

17.2.5.2.1

Each plant administrative procedure, and changes thereto, shall be reviewed in accordance with 17.2.1.7.1.6, and approved by the Plant Manager prior to implementation, and shall be reviewed periodically thereafter as set forth in administrative procedures.

17.2.5.2.2

Each plant procedure required by Specification 6.8.1, other than administrative procedures, and changes thereto, shall be reviewed in accordance with 17.2.5.1, and approved by the Plant Manager prior to implementation and shall be reviewed periodically thereafter as set forth in administrative procedures. The Plant Manager may delegate approval authority in writing for specific types of procedures to a management representative responsible for the functional area.

17.2.5.2.3

Temporary changes to procedures of Technical Specification 6.8.1 may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the unit management staff, at least one of whom holds a Senior Operator license on Fermi 2; and
- c. The change is documented, and reviewed and approved in accordance with either 17.2.5.2.1 or 17.2.5.2.2, as appropriate, within 14 days of implementation.

17.2.5.3 Process Control Program (PCP)

The PCP shall be approved by the Commission prior to implementation.

17.2.5.3.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Subsection 17.2.17.4.3n. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the OSRO and the approval of the Plant Manager.

17.2.6 Document Control

Documents defining the performance of quality-related activities are controlled to ensure that only current and correct information is used at the work location. Such documents include, but are not limited to, the following:

- a. Design specifications, calculations, and analyses
- b. Design, manufacturing, and construction drawings

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.

17.2.17.4 Record Retention

17.2.17.4.1

In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

17.2.17.4.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE EVENTS.
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Technical Specification 6.8.1.
- f. Records of sealed source and fission detector leak tests and results.
- g. Records of annual physical inventory of all sealed source material of record.

17.2.17.4.3

The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report.
- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.
- c. Records of doses received by all individuals for whom monitoring was required.
- d. Records of gaseous and liquid radioactive material released to the environs.
- e. Records of transient or operational cycles for those unit components identified in Technical Specification Table 5.7.1-1.
- f. Records of reactor tests and experiments.
- g. Records of training and qualification for current members of the unit staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- i. Records of quality assurance activities required by the Operational Quality Assurance Manual.
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- k. Records of meetings of the OSRO and the NSRG.
- l. Records of the service lives of all hydraulic and mechanical snubbers required by Technical Specification 3.7.5 including the date at which the service life commences and associated installation and maintenance records.
- m. Records of analyses required by the radiological environmental monitoring program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- n. Records of reviews performed for changes to the OFFSITE DOSE CALCULATION MANUAL and PROCESS CONTROL PROGRAM.
- o. Records of radioactive shipments.

17.2.18.4 Nuclear Safety Review Group

The NSRG is responsible for review and audit as specified in Subsection 17.2.1.7.2.7 and 17.2.1.7.2.8. 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.

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 or a frequency is specified by regulation.

- 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