



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE

CONSUMERS POWER COMPANY

BIG ROCK POINT AND PALISADES PLANTS

DOCKET NOS. 50-155 AND 50-235

1.0 INTRODUCTION

By letter dated February 20, 1997, Consumers Power Company, the licensee, transmitted proposed changes to Revision 17 of its Quality Program Description for Operational Nuclear Power Plants (CPC-2A) in accordance with 10 CFR 50.54(a)(3)(ii). Specifically, the proposed changes identify alternatives to the previously approved provisions related to lead auditor qualifications and annual supplier evaluation. The staff has reviewed the submittal in accordance with 10 CFR 50.54(a) and determined that the proposed changes to CPC-2A are acceptable in that the quality assurance program continues to meet the requirements of Appendix B to 10 CFR Part 50.

2.0 EVALUATION

2.1 Lead Auditor Qualification Process

Section 2.3.4, "Audit Participation," of ANSI N45.2.23-1978, "Qualification of QA Program Audit Personnel for Nuclear Power Plants," as endorsed by Regulatory Guide (RG) 1.146, "Qualification of Quality Assurance Audit Personnel for Nuclear Power Plants," dated August 1980, states that:

The prospective Lead Auditor shall have participated in a minimum of five (5) quality assurance audits within a period of time not to exceed three (3) years prior to the date of qualification, one audit of which shall be a nuclear quality assurance audit within the year prior to the individual's qualification.

As described in its submittal the licensee has proposed the following alternative to the requirements contained in Section 2.3.4 of ANSI N45.2.23-1978:

The prospective lead auditor shall demonstrate his ability to properly implement the audit process defined by this Standard and Consumers Power Company program/procedure, to effectively lead an audit team, and to effectively organize and report results, including participation in at least one nuclear quality assurance audit within the year preceding date of certification.

Enclosure

Based on the staff's review it was determined that the alternative proposed by Consumers Power Company represents an acceptable option to Section 2.3.4 of ANSI N45.2.23-1978. This determination was based on the licensee's program controls which require that (1) prospective lead auditors effectively demonstrate their ability to lead an audit team and effectively implement the audit process and (2) that the licensee describe this demonstration process in written procedures and that the results of these activities are evaluated and documented. The alternative also requires that the prospective lead auditor shall have participated in at least one nuclear quality assurance audit within the year preceding the individual's effective date of qualification and that having met the other provisions of Section 2.3 of ANSI N45.2.23-1978, the individual may be certified as being qualified to lead audits.

## 2.2 Annual Supplier Evaluation

ANSI N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants," as endorsed by NRC RG 1.144, "Auditing of Quality Assurance Programs for Nuclear Power Plants," Revision 1, dated September 1980, describes a method acceptable to the NRC staff for complying with regulations concerning auditing of quality assurance programs for nuclear power plants. Specifically, Section 3.5.2 of ANSI N45.2.12-1977 requires that audits of quality assurance activities be regularly scheduled to ensure that the quality assurance program is adequate and that activities are being performed in accordance with the quality assurance program. Regulatory Position C.3, of RG 1.144, discusses acceptable audit scheduling. In particular, Regulatory Position C.3.b(2), which addresses the auditing of a supplier's quality assurance program, permits an audit frequency of up to 3 years, provided that the licensee performs an annual evaluation of the supplier's performance in accordance with the following requirements:

A documented evaluation of the supplier should be performed annually. Where applicable, this evaluation should take into account (1) review of supplier furnished documents such as certificates of conformance, non-conformance notices, and corrective actions, (2) results of previous source verifications, audits, and receiving inspections, (3) operating experience of identical or similar products furnished by the same supplier, and (4) results of audits from other sources (e.g., customer, ASME, or NRC audits).

As described in its submittal the licensee has proposed the following alternative to the requirements contained in Regulatory Position C.3.b(2), of RG 1.144:

Consumers Power Company will review the information described in the second paragraph of section C.3.b(2) of Regulatory Guide 1.144, Revision 1, 1980, as it becomes available through its ongoing receipt inspection, operating experience and supplier evaluation programs, in lieu of performing a specific evaluation on an annual basis. The results of the reviews are promptly considered for effect on a supplier's continued qualification and adjustments made as necessary (including corrective actions, adjustments of supplier audit plans, and

input to third party auditing entities as warranted). In addition, the results are reviewed periodically to determine if, as a whole, they constitute a significant condition adverse to quality requiring additional action.

Based on the staff's review it was determined that the alternative proposed by Consumers Power Company represents an acceptable option to Regulatory Position C.3.b(2) of RG 1.144. Specifically, the alternative to the preceding position provides for a documented ongoing evaluation of the supplier's performance, rather than a delayed annual evaluation. Where applicable, this evaluation takes into account the review of supplier-furnished documents such as certificates of conformance, non-conformance notices, and corrective actions, as well as evaluating the results of previous source verifications, audits, and receiving inspections. The proposed alternative also provides for the review of operating experience information pertaining to equipment failures and evaluation of the results of audits from other sources (e.g., customer, ASME, or NRC audits) for their effect on supplier qualification status. As described in the licensee's program, the results of these evaluations are reviewed and appropriate corrective action taken. Furthermore, adverse findings resulting from these evaluations are periodically reviewed to determine if, in the aggregate, they result in a significant condition adverse to quality. Additionally, the results of these evaluations are used to provide input to support supplier audit activities conducted by Consumers Power Company or third party auditing organizations.

### 3.0 CONCLUSION

The staff has determined that the proposed changes to Revision 17 of Consumers Power Company's Quality Program Description for Operational Nuclear Power Plants (CPC-2A), related to lead auditor qualifications and annual supplier evaluation represent an acceptable alternative to the review criteria contained in Section 17.2 of NUREG-0800, the Standard Review Plan, and that these changes continue to meet the requirements of Appendix B to 10 CFR Part 50.

Principal contributor: R. Latta

Date: April 18, 1997