



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE

PECO ENERGY COMPANY
PUBLIC SERVICE ELECTRIC AND GAS COMPANY
DELMARVA POWER AND LIGHT COMPANY
ATLANTIC CITY ELECTRIC COMPANY

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

DOCKET NOS. 50-277 AND 50-278

1.0 INTRODUCTION

By letter dated February 24, 1997, PECO Nuclear Unit of the PECO Energy Company (PECO) transmitted a proposed revision to Revision 13 of the Peach Bottom Atomic Power Station Quality Assurance Program Description in accordance with 50.54(a). The staff has reviewed the submittal in accordance with 50.54(a) and determined that the change to the quality assurance program is acceptable in that the quality assurance program continues to meet the requirements of Appendix B to 10 CFR Part 50. It meets the additional requirements of 50.34(B)(6)(ii) by discussing how the applicable requirements of Appendix B will be satisfied.

This safety evaluation describes the staff's analysis of the proposed alternative to previously approved provisions for the lead auditor qualifications.

2.0 EVALUATION OF PROPOSED ALTERNATIVE FOR THE LEAD AUDITOR QUALIFICATION PROCESS

2.1 Lead Auditor Qualification Process

The licensee's Quality Assurance program description is contained in Appendix D of the Peach Bottom Updated Final Safety Analysis Report. The licensee is presently committed in its quality assurance program to 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 1.146, "Qualification of Quality Assurance Audit Personnel for Nuclear Power Plants," dated August 1980. Section 2.3.4 states the following:

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 the February 24, 1997, submittal, the licensee has proposed the following alternative to the provisions contained in Section 2.3.4 of ANSI N45.2.23-1978:

"Prospective Lead Auditors shall demonstrate their ability to effectively implement the audit process and effectively lead an audit team. This process is described in written procedures which provide for evaluation and documentation of the results of this demonstration. A 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. Upon successful demonstration of the ability to effectively implement the audit process and effectively lead audits, and having met the other provisions of Section 2.3 of ANSI/ASME N45.2.23-1978, the individual may be certified as being qualified to lead audits."

The staff conducted its review in accordance with the guidance in Section 17.2, "Quality Assurance During the Operational Phase," of NUREG-0800, "Standard Review Plan" (SRP 17.2). The introduction paragraph of Section II, "Acceptance Criteria," of SRP 17.2 contains provisions for the use of alternatives to the acceptance criteria contained in SRP 17.2 provided they are evaluated by the staff and are considered to be in compliance with pertinent NRC regulations.

Based on the staff's review it was determined that the alternative for lead auditor qualification proposed by the licensee represents an acceptable alternative to Item 18B3 of SRP 17.1 which is referenced in the criteria for audits in SRP 17.2. This determination was based on the licensee's quality assurance program controls which require that 1) prospective lead auditors effectively demonstrate their ability to implement the audit process and lead an audit team, 2) this demonstration process be described in written procedures or instructions, 3) the results of the demonstration be evaluated and documented, and 4) regardless of the methods used for the demonstration, 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. The alternative also contains provisions that upon successful demonstration of the ability to effectively implement the audit process and effectively lead audits, and 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.

3. CONCLUSION

The staff has also determined that the proposed alternatives to provisions identified in Revision 13 of the Peach Bottom Atomic Station's Quality Assurance Program Description, related to lead auditor qualification, represent an acceptable alternative to the review criteria contained in Section 17.2 of NUREG-0800 and that these changes are acceptable and continue to meet the pertinent requirements of Appendix B to 10 CFR Part 50.

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