



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGE

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated February 24, 1997, PECO Nuclear Unit of the Philadelphia Electric Company (the licensee) transmitted a proposed revision to Revision 6 of the Limerick Generating Station (LGS) 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 and 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, and annual supplier evaluation.

2.0 EVALUATION

2.1 Lead Auditor Qualification Process

The licensee's Quality Assurance program description is contained in Appendix 17.2.II, item q of the LGS 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.

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 Regulatory Guide (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. 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 what the NRC staff considers acceptable audit scheduling. Regulatory Position C.3.b(2) specifically addresses the auditing of a supplier's quality assurance program and permits an audit frequency of 3 years provided that the licensee performs an annual evaluation of the supplier's performance as follows:

"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, nonconformance 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)."

The NRC considers the alternative proposed by the licensee to be an acceptable alternative to Regulatory Position C.3.b(2) of RG 1.144 based on the following discussion:

The alternative to the preceding position provides for a continuous or ongoing evaluation of the supplier's performance be conducted rather than a delayed annual evaluation. The staff considers the alternative acceptable as long as the results of the ongoing evaluation are documented and the evaluation findings are reviewed in order to determine if any corrective action is required.

The alternative proposed by the licensee contains provisions for a documented ongoing evaluation of the supplier to be performed. Where applicable, this evaluation takes into account (1) review of supplier-furnished documents such as certificates of conformance, nonconformance 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). The results of the evaluations are reviewed and appropriate corrective action taken. Adverse findings resulting from these evaluations are periodically reviewed in order to determine if, as a whole, they result in a significant condition adverse to quality and to provide input to support supplier audit activities conducted by the licensee or a third party auditing entity.

3.0 CONCLUSION

The staff has determined that the proposed alternatives identified in Revision 6 of the Limerick Generating Station's Quality Assurance Program Description, 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 and these changes are acceptable and continue to meet the pertinent requirements of Appendix B to 10 CFR Part 50.

Principal Contributor: L. Campbell

Date: June 26, 1997