

QA Program (Audits)  
Procedure No.: 35741B  
Issue Date: 10-1-76

SECTION I  
INSPECTION OBJECTIVE

Ascertain whether the licensee has developed and implemented a QA Program relating to audits of activities that is in conformance with Regulatory requirements, commitments in the application and industry guides or standards.

SECTION II  
INSPECTION REQUIREMENTS

1. Program Review

- a. Verify that the scope of the audit program has been defined and that it is consistent with FSAR commitments and Technical Specification requirements.
- b. Verify that responsibilities have been assigned in writing for the overall management of the audit program including:
  - (1) Determining the adequacy of the qualifications of audit personnel.
  - (2) Determining the need for special training of audit personnel and/or inclusion of special expertise.
  - (3) Determining the independence of audit personnel.
  - (4) Assuring corrective actions are taken for deficiencies identified during audits.
  - (5) Determining when reaudits are required.

- (6) Issuance of audit reports to management.
  - (7) Periodic review of the audit program to determine its status and adequacy.
  - (8) Preparation of the long range audit plans or schedules.
- c. Verify that methods or administrative channels have been defined for taking corrective actions when deficiencies are identified during audits.
  - d. Verify that the audited organization is required to respond in writing to audit findings.
  - e. Verify that distribution requirements for audit reports and corrective action responses have been defined.
  - f. Verify that checklists or procedures are required to be used in the performance of audits.

2. Implementation

- a. Review the current long range audit schedule or plan in effect and verify that areas to be audited and audit frequencies identified are consistent with Technical Specification requirements and FSAR commitments.
- b. Review the audit reports for the two recently completed audits and determine the following:
  - (1) An audit checklist or procedure was prepared, used and covered the areas designated in the audit schedule.
  - (2) Auditors were independent of any direct responsibility for the activities which they audited.
  - (3) Deficiencies identified during the audit have been resolved or they are currently being carried as an "open item."
  - (4) The audited organization has responded in writing to the audit findings.

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- (5) Distribution of audit reports and response was  
consistent with program requirements.

SECTION III  
INSPECTION GUIDANCE

References: ANSI N18.7-1976, ANSI N45.12-1973; Section 6 of the proposed Technical Specifications; Section 17 of the FSAR.

- 1.a Section 6 of the proposed Technical Specifications and Section 17 of the FSAR normally define the scope of the licensee's independent audit program. The inspector should determine that the documented scope of the corporate audit program is consistent with these documents. Responsibility for the audit program may rest with the corporate QA group and/or the company nuclear review group. If responsibility for audit is divided the inspector should review both programs.

- 1.b Audit program requirements are discussed in Section 4.5 of ANSI N18.7-1976, ANSI N45.2.12-1973 and Section 17 of the FSAR. Fomral designation of responsibility to manage and implement the program requirements should be verified.
  
- 1.d Section 4.5 of ANSI N45.2.12-1973 specifies that the audited organization shall respond to audit findings within 30 days.
  
- 1.e Receipients of audit reports should also receive copies of the response.
  
- 2.a The long range audit schedule should demonstrate that the licensee's audit program is consistent with Technical Specification requirements and FSAR commitments. The frequency of audits should be commensurate with the safety significance of the safety related function. Normally the maximum audit intervals will

be specified in the FSAR and Technical Specifications. ANSI N18.7 specifies that all safety related activities should be audited at least every two years.

2.b.(1) The inspector should determine whether the scope and depth of the individual audit sufficiently covered the scheduled or master plan area for which credit was taken. For example, an audit of operating procedures alone would not be sufficient to take credit for completion of a major audit of PROCEDURES.

2.b.(4) If sufficient time has not elapsed since the audits for the audited organization to respond, verify responses have been received for any two previous audits.

Note: 1. The inspection requirements established in this module should not be reinspected when subsequent units at multiunit sites are licensed unless site management, Section 6 of Facility Technical

Specifications and the approved Quality Assurance have been revised for the new unit.

2. The program review function should be completed during the Operational Preparedness Phase of MC 2513.
3. An audit program for plant operation is not required until the facility license is issued. Therefore, inspection of program implementation may be deferred if necessary, but should be completed within the first six-month period of operation.
4. For record keeping purposes, the program review and program implementation phases of the inspection will be assigned as 50% of the total inspection effort.