

Mr. L. W. Myers  
Senior Vice President  
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Post Office Box 4  
Shippingport, PA 15077

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE PROPOSED  
FIRSTENERGY NUCLEAR OPERATING COMPANY QUALITY ASSURANCE  
PROGRAM MANUAL (TAC NOS. MB0914 AND MB0915)

Dear Mr. Myers:

By letter dated December 27, 2000, FirstEnergy Nuclear Operating Company (FENOC) submitted a request for Nuclear Regulatory Commission (NRC) approval of FENOC Quality Assurance Program Manual (QAPM), Revision 1. This letter was submitted on the Beaver Valley Power Station, Davis-Besse Nuclear Power Station, and Perry Nuclear Power Plant dockets. The NRC staff was verbally informed that FENOC staff at Beaver Valley Power Station would be the primary point of contact for this project. The NRC staff has determined that additional information is required to complete its review. Enclosed is the request for additional information (RAI) which was discussed with FENOC staff via teleconference on April 4, 2001. It was agreed that your response would be provided within 60 days of the date of this letter.

Please contact me with any questions or comments regarding this project. I may be reached at (301) 415-3053 or [ljb@nrc.gov](mailto:ljb@nrc.gov).

Sincerely,

Lawrence J. Burkhart, Project Manager, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-334, 50-412, 50-346, and 50-440

Enclosure: RAI

cc w/encl: See next page

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Sincerely,

Lawrence J. Burkhardt, Project Manager, Section 1  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-334, 50-412, 50-346, and 50-440

Enclosure: RAI

cc w/encl: See next page

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Accession No. ML010960148

\* RAI incorporated with no significant changes

OFFICE	PDI-1/PM	PDI-2/LA	IQMB/SC	PDI-1/SC (A)
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DATE			4/9/01*	

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REQUEST FOR ADDITIONAL INFORMATION REGARDING  
FIRSTENERGY NUCLEAR OPERATING COMPANY  
QUALITY ASSURANCE PROGRAM MANUAL PROPOSED CHANGES

DATED DECEMBER 27, 2000

Note: The request for additional information (RAI) refers to change identifiers (side bars) referenced in Attachment 3 (Proposed FirstEnergy Nuclear Operating Company [FENOC] Quality Assurance Program Manual, Red-Line Version) and Attachment 4 (Change Descriptions) of the request for approval of the FENOC Quality Assurance Program Manual (QAPM), Revision 1, submitted by letter dated December 27, 2000.

1. The Direct Final Rule, effective on April 26, 1999 (64 FR 9030), revises the regulation of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.54(a)(3) to provide additional flexibility for licensees making changes to their QAP without obtaining Nuclear Regulatory Commission (NRC) approval of these changes in advance. Forty-nine changes to the QAP have been identified in Attachment 4 of the submittal. Please identify those changes considered to be reductions in commitments.
2. The QAPM revision creates a corporate QA oversight function (Attachment 3, Section A.2.a). Please clarify whether this function implements the guidance of ANSI N18.7-1976, Section 4.3, for independent review. Clarify how the provisions of Section 4.3 are implemented. Describe any reporting relationships between the sites and the corporate function. (Side Bar 3)
3. Changes in the commitment to Regulatory Guide (RG) 1.8, "Personnel Selection and Training," should continue to be subject to the review requirements of 10 CFR 50.54(a). RG 1.8 is explicitly referenced by Standard Review Plan 17.3 as applicable to the QA regulations of Appendix B. (Side Bar 6)
4. The original wording "the guidance will be applied to activities comparable in nature and extent to construction phase activities," is clearer than the proposed clarification (Attachment 3, Section A.7.a.5) and should be retained. (Side Bar 9)
5. The revised QAPM differentiates between audits that satisfy Appendix B requirements and those that do not. Identify which of the audits listed in Section C.2.a satisfies Appendix B requirements. Clarify any differences in QAP implementation for the two audit types, particularly with respect to RG 1.144 and RG 1.146. (Side Bar 16)
6. Commitments to the following regulatory guides (and associated standards) are proposed to be removed from the QAPM: RG 1.26, RG 1.29, RG 1.54, RG 1.55, RG 4.15, and RG 1.78. If these commitments are duplicated elsewhere in the Final Safety Analysis Reports (FSARs), please provide the reference to applicable FSAR sections for each plant. If these commitments are to be relocated in conjunction with the QAPM revision, identify the FSAR sections where they will be relocated, provide marked-up pages indicating any revisions that will be made to the relocated commitments, and provide an implementation schedule consistent with the proposed

Enclosure

QAPM revision. Cite instances where an NRC safety evaluation has approved removal of any of these commitments to RGs from a licensee's QAP. (Side Bars 19, 21, 33, 34, 48, 49)

7. With respect to RG 1.30, the QAPM commitment is revised to meet the intent instead of the positions of the RG. Clarify the term "intent" by specifying the proposed exceptions or alternatives to RG 1.30. (Side Bar 22)
8. The QAPM revision proposes an exception to the guidance of ANSI 18.7, Section 4.3, in that license amendments will not be independently reviewed. The basis provided (Attachment 4) is that amendments are reviewed by an onsite review body (ANSI 18.7, Section 4.4). Since the onsite review body already reviews license amendment changes as part of its responsibilities, the exception effectively eliminates independent review. Provide additional justification for this exception. (Side Bar 24)
9. The revised commitment to RG 1.33 reduces the scope of applicability of QA requirements to structures, systems, and components (SSCs) that are "safety-related." Currently, the QAPM is applicable to SSCs that are "important to safety." The regulations do not always differentiate between the terms "important to safety" and "safety-related." For example, the General Design Criteria apply to SSCs important to safety, although the term "safety-related" is generally implied. IEEE Standard 279, which addresses protection systems, refers to important to safety functions; this standard is incorporated by reference into the regulations (10 CFR 50.55a(h)). Further, SSCs that are "important to safety", but not necessarily "safety-related," generally fall within the scope of most QAPs to an extent consistent with their importance to safety (Appendix B, Criterion II). Examples of nonsafety-related SSCs that are important to safety include those associated with systems designed to prevent or mitigate anticipated transients without scram, station blackout, and fire protection. A more complete discussion should be provided, which defines the scope of the FENOC QAP in general and the specific examples cited above. (Side Bar 26)
10. Procedural controls are generally included in plant technical specifications under administrative controls (10 CFR 50.36(a)(5)). The NRC has allowed licensees to relocate certain administrative controls, including those for procedure adherence, to the QAP. For each plant covered by the QAPM, identify the licensing basis document that includes the process for controlling temporary changes to procedures. For each plant, identify the regulatory process used for controlling these changes. Cite references to NRC safety evaluations that have approved control of these changes through the 10 CFR 50.59 change control process. (Side Bar 30)