



FirstEnergy Nuclear Operating Company

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DBNPS Letter Serial 2719
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United States Nuclear Regulatory Commission
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Beaver Valley Power Station Unit 1
Operating License No. DPR-66
Docket No. 50-334

Beaver Valley Power Station Unit 2
Operating License No. NPF-73
Docket No. 50-412

Davis-Besse Nuclear Power Station
Operating License No. NPF-3
Docket No. 50-346

Perry Nuclear Power Plant
Operating License No. NPF-58
Docket No. 50-440

Subject: Change to Regulatory Guide 1.33 Position Described in Proposed FirstEnergy Nuclear Operating Company Quality Assurance Program Manual Revision 1 (TAC Nos. MB0914 and MB0915)

Ladies and Gentlemen:

By letter dated December 27, 2000, the FirstEnergy Nuclear Operating Company (FENOC) requested Nuclear Regulatory Commission (NRC) review and approval of Revision 1 of the FENOC Quality Assurance Program Manual (QAPM). By letter dated April 12, 2001, the NRC requested additional information necessary to complete its review of this revision. The requested information was provided in a letter dated June 4, 2001.

One of the items proposed in the QAPM, Revision 1 and addressed in the June 4, 2001 letter was a proposed alternative for review of license amendment requests by an independent review body. This alternative was described in QAPM Table 1, (Section C. Regulatory Guide 1.33, Quality Assurance Program Requirements [Operations]), Paragraph C.1.a. Based on a telephone conference with the NRC staff on June 21, 2001, FENOC has decided not to pursue NRC approval of this proposed alternative at this time. Therefore FENOC withdraws its request for NRC approval of this proposed alternative. Attachment 1 to this letter contains a revision to Table 1, Paragraph C.1.a with the proposed alternative deleted.

Q004

If you have questions or require additional information, please contact William R. Kanda,
Director of Oversight and Process Improvement at (440) 280-5579.

Very truly yours



Robert F. Saunders

Attachments

Enclosure

cc: NRC Project Manager, Beaver Valley Power Station
NRC Project Manager, Davis-Besse Nuclear Power Station
NRC Project Manager, Perry Nuclear Power Plant
NRC Senior Resident Inspector, Beaver Valley Power Station
NRC Senior Resident Inspector, Davis-Besse Nuclear Power Station
NRC Senior Resident Inspector, Perry Nuclear Power Plant
NRC Region I
NRC Region III
Utility Radiological Safety Board

QUALITY ASSURANCE PROGRAM MANUAL

documentation may proceed provided that this equipment has been identified and released in accordance with non-conforming material procedures and that all required quality documentation has been received and accepted prior to the item being placed in service.

- c. Section 3 requires that records of protective measures maintained during storage for conformance to storage requirements be checked to verify that items are in satisfactory condition for installation. This check shall be made only if equipment requires special storage or handling as specified in procurement documents.
- d. Sections 5.2 and 6.2 list the tests which are to be conducted during construction and post-construction activities. In lieu of these tests, FENOC shall conduct only those tests necessary to verify that work activities specified by work controlling documents have been satisfactorily accomplished during maintenance or modification activities. The requirements of Sections 5.2 and 6.2 of ANSI N45.2.4 shall be used as guidelines in determining these testing requirements.
- e. Section 6.2.1 states in part that "Items requiring calibration shall be tagged or labeled on completion indicating date of calibration and identity of person that performed the calibration." In lieu of this requirement, FENOC may alternatively implement programs that require the equipment to be suitably marked to indicate the date of the next calibration and the identity of the person that performed the calibration.

C. Regulatory Guide 1.33 (Revision 2) [February 1978], *Quality Assurance Program Requirements (Operations)*

1. FENOC commits to the regulatory position of this Guide with the following alternatives:
 - a. ~~Regulatory Position C.3 specifies review of proposed license amendments by the independent review body prior to submittal to the NRC. As an alternative, a committee that is part of the onsite operating organization may perform this review.~~
 - ba. Regulatory Position C.4 specifies audit frequencies for several audit topics. QAPM Section C.2 (Audit) describes alternatives to these frequencies.
2. FENOC commits to the requirements of ANSI N18.7-1976/ANS 3.2 with the following clarifications:
 - a. Section 1 requires that this Standard "apply to all activities affecting the safety-related functions of nuclear power plant structures, systems, and components."

COMMITMENT LIST

THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY THE DAVIS-BESSE NUCLEAR POWER STATION (DBNPS) IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THIS SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS BY THE DBNPS. THEY ARE DESCRIBED ONLY FOR INFORMATION AND ARE NOT REGULATORY COMMITMENTS. PLEASE NOTIFY THE MANAGER-REGULATORY AFFAIRS (419-321-8450) AT THE DBNPS OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.

COMMITMENT

DUE DATE

None

N/A