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5928-08-20046

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

THREE MILE ISLAND NUCLEAR STATION, UNIT 2 (TMI-2)
POSSESSION ONLY LICENSE NO. DPR 73
DOCKET NO. 50-320
TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 86

SUBJECT: DELETION OF TECHNICAL SPECIFICATION SECTIONS 6.5, REVIEW AND
AUDIT

In accordance with 10 CFR 50.4(b)(1), enclosed is TMI Unit 2 Technical Specification Change Request (TSCR) No. 86. The proposed change will delete the TMI-2 Technical Specification (TS) section 6.5, Review and Audit. TS 6.5.1 Technical Review and Control requirements and TS 6.5.3 Audits requirements will be implemented by the current and proposed changes to the GPU Nuclear Post-Defueling Monitored Storage Quality Assurance Plan for Three Mile Island Unit 2 (PDMS QAP). TS 6.5.2 Independent Safety Review Function requirements will be deleted with no replacement.

Using the standards in 10 CFR 50.92, GPU Nuclear has concluded that this proposed change does not constitute a significant hazards consideration, as described in the enclosed analysis performed in accordance with 10 CFR 50.91(a)(1).

Enclosure 1 provides the list of regulatory commitments for this request. Enclosure 2 provides the Safety Evaluation and No Significant Hazards Consideration Analysis. Enclosures 3 and 4 provide the revised and marked-up TS pages, respectively. Enclosures 5 and 6 provide the marked-up PDMS QAP pages and the Exelon/AmerGen Station Qualified Review procedure AD-AA-102, respectively, for information only.

Pursuant to 10 CFR 50.91(b)(1), a copy of this TSCR is provided to the designated official of the Commonwealth of Pennsylvania, Bureau of Radiation Protection, as well as the chief executives of the township and county in which the facility is located.

GPU Nuclear requests that the review and approval of this request be coordinated with a similar Emergent proposal for TMI-1, dated November 13, 2007 (ML073240040) so that the implementation of the amendment requests can be coordinated simultaneously at both TMI-1 and TMI-2.

There is one regulatory commitment contained in the enclosure to this letter. Please contact Adam Miller of TMI-1 Regulatory Assurance at (717) 948-8128 if you have any questions.

NMSS01
NMSS

I declare under penalty of perjury that the foregoing is true and correct. Executed on 11th day of June, 2008.

Very truly yours,



Joseph J. Hagan
President and Chief Nuclear Officer

JJH/awm

Enclosures: 1) List of Regulatory Commitments
2) Safety Evaluation and No Significant Hazards Consideration Analysis
3) TMI-2 Technical Specifications Revised Pages
4) Markup of TMI-2 Technical Specifications Revised Pages
5) Markup of TMI-2 PDMS QAP Revised Pages
6) Exelon/AmerGen Procedure, AD-AA-102, Station Qualified Review

cc: USNRC Region I Administrator
USNRC TMI-2 Senior Project Manager
USNRC TMI Senior Resident Inspector
Chairman, Board of Supervisors of Londonderry Township
Chairman, Board of County Commissioners of Dauphin County
Director, Bureau of Radiation Protection, PA Department of Environmental Resources
File No. 08020

Enclosure 1
List of Regulatory Commitments

The following table identifies those actions committed to by GPU Nuclear in this document. Any other statements in the submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	COMMITTED DATE	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes/No)	PROGRAMMATIC (Yes/No)
GPU Nuclear commits to revising the applicable GPU Nuclear PDMS QAP for the Three Mile Island Unit 2 sections 3.3 and 5.2 as described in this submittal (Enclosure 5) for independent technical reviews (Station Qualified Reviews)	Implement with amendment	Yes	No

Enclosure 2

**TMI Unit 2 Technical Specification Change Request No. 86
Safety Evaluation and No Significant Hazards Consideration Analysis**

1.0 Technical Specification Change Request (TSCR) No. 86

GPU Nuclear requests that the revision for Table of Contents page vi, and pages 6-2 through 6-6 be inserted into the existing TMI-2 Technical Specifications (TS).

The revised pages (showing the change location with a vertical bar on the right side of the page) are provided in Enclosure 3. Enclosure 4 provides a markup of the current pages. Enclosure 5 provides a markup of the proposed changes to the GPU Nuclear Post-Defueling Monitored Storage Quality Assurance Plan for Three Mile Island Unit 2 (PDMS QAP) (Reference 1) for information only. Enclosure 6 provides the Exelon/AmerGen procedure for performing independent technical reviews, AD-AA-102, "Station Qualified Review," for information only. GPU Nuclear plans to use elements of this procedure to perform independent technical reviews for TMI-2.

2.0 Description of Proposed Change

The proposed changes will specifically delete the Technical Specification (TS) 6.5.1 requirements for Technical Review and Control, utilizing instead the Technical Review and Control and Design Control requirements of the NRC-approved GPU Nuclear Post-Defueling Monitored Storage Quality Assurance Plan for Three Mile Island Unit 2 (PDMS QAP) (Reference 1) and proposed changes to the PDMS QAP. The proposed changes will delete the TS 6.5.2 requirements for the Independent Safety Review (ISR) Function process with no replacement process. The proposed changes will also delete the TS 6.5.3 requirements for Audits, utilizing instead the Audit process described in Section 18 and Appendix A of the PDMS QAP.

3.0 Background

AmerGen has submitted a TMI Unit 1 Technical Specification Change Request (TSCR) No. 330, "Deletion of Technical Specification Requirements for Review and Audit, and Additional Administrative Changes," on November 13, 2007 (Reference 2). Part of this TSCR will remove the Responsible Technical Reviewer (RTR) and Independent Safety Review (ISR) programs for TMI-1. TMI-2 also uses the same RTR and ISR programs and qualified personnel for technical review and audit activities performed on TMI-1. GPU Nuclear wants TMI-2 to maintain consistent technical review and audit programs and personnel similar to TMI Unit-1 and, therefore, is submitting a similar TSCR.

4.0 Technical Analysis

The proposed TS changes conform to NRC regulatory guidance presented in the Review and Audits and Procedure Review Process sections of Administrative Letter 95-06. Accordingly, a technical specification/process matrix has been developed containing the existing TS requirements and a reference to an existing section of the PDMS QAP. No relocation of deleted TS requirements to the PDMS QAP is necessary since the applicable Technical Review and Control and Audit deleted TS requirements are contained in existing PDMS QAP requirements and proposed changes associated with this submittal (Enclosure 5) and are equivalent to the TS requirements being deleted; except for the ISR program, which is being deleted. Therefore, no "relocation" of these

deleted TS to the PDMS QAP is required. Future changes to the technical review and audit requirements of the PDMS QAP are governed by regulation 10CFR50.54(a).

The regulation governing TS requirements is 10 CFR 50.36 and it states for administrative controls that they are "the provisions relating to organization and management, procedures, record keeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The specific content of the administrative controls section of the TS is, therefore, that information which the NRC deems essential for the safe operation of the facility, and which is not already adequately covered by other regulations. Accordingly, the NRC has determined that requirements that are not specifically required under 50.36(d)(5), and are not otherwise necessary to obviate the possibility of an abnormal situation, or event, giving rise to an immediate threat to the public health and safety, can be removed from the administrative controls section of the Technical Specifications. The scope of this license amendment includes deletion of the Technical Review and Audit sections from the TMI-2 TS.

Accordingly, the proposed TS changes meet the above requirements in that the subject sections are not otherwise necessary to obviate the possibility of an abnormal situation or event, giving rise to an immediate threat to the public health and safety. The proposed removed sections involve procedure preparation, review and approval activities, design control, independent safety reviews and specification of activities required for audits.

In addition, the Standard Technical Specification (STS) Administrative Control sections do not contain the amount of detail for Review and Audit as found in the TMI-2 TS 6.5 sections. The NRC has approved NUREG-1430, Standard Technical Specifications – Babcock and Wilcox Plants. The Standard Technical Specifications were developed based on the criteria in the "Final Commission Policy Statement on Technical Specifications Improvement for Nuclear Power Reactors," dated July 22, 1993, and subsequently codified in 10 CFR 50.36. The preface to these documents encourages licensees to adopt some or all of the improved TS into their existing TS. The TS sections proposed herein for deletion do not appear in the improved STS presented in NUREG-1430, and accordingly, are not required to be in the TS.

The technical review RTR program will be replaced by the technical review program known as the Station Qualified Review (SQR) program (Enclosure 6). The SQR program will be implemented through station qualified reviewers (SQRs). The RTRs and SQRs have similar qualification requirements. The SQRs' qualification requirements meet the appropriate sections of the ANSI/ANS-3.1 revision that is committed to for TMI-2, which is ANSI/ANS 3.1-1978. Under the new proposal, TMI-2 SQRs will not have the alternate qualification path of seven years experience in lieu of meeting the ANSI 3.1 standard, as the current TS afford. The PDMS QAP Section 3.3 will be revised to state that design verification shall be performed by competent and qualified individuals(s) other than those who performed the original design and completed prior to relying upon the component, system, structure, or computer program to perform its function. The PDMS QAP Section 5.2 will be revised to state that independent technical reviews shall be in accordance with TMI approved procedures and that procedures within the scope of the PDMS QAP shall be independently technically reviewed prior to implementation by a qualified individual knowledgeable in the area affected. The technical reviewer shall be an individual other than the originator.

The ISR Function TS requirements and associated ISR program are being deleted with no replacement process. The need for the ISR Function originated from the post TMI Unit 2 accident and TMI-1 restart period and is no longer required because there are no longer any operational systems classified as safety related systems. TMI-2 was originally designed and constructed in compliance with appropriate 10CFR50 Codes and Standards. Due to the non-operating and defueled status of TMI-2 during the PDMS phase, there are no structures, systems and components that perform a safety function.

Therefore, technically, there cannot be independent safety reviews. TMI-2 TS do identify certain structures, systems and components required to be operable and require the application of design and procedure controls on a graded basis should modifications or new/revised procedures be required. The requirements of the PDMS QAP Section 3.0, Design Control, and Section 5.0 Instructions, Procedures, and Drawings, provide for adequate design and procedure controls and thus ISR requirements are no longer applicable and need to be deleted from the TS.

Revisions to the administrative controls section of the TMI-2 TS are currently subject to a no significant hazards consideration determination pursuant to 10 CFR 50.92. This determination is oriented to the design and operational requirements described in the TS. The administrative controls selected for deletion are considered by the NRC in the above referenced AL 95-06 to be quality assurance requirements, and therefore qualify for incorporation into documents describing the licensee's quality assurance program. As stated in AL 95-06, 10 CFR 50.54(a) and 10CFR50.59 are the appropriate regulations for controlling changes to these and other quality assurance program requirements. Future changes to the PDMS QAP and the independent technical review process, as described in the PDMS QAP, are controlled by 10CFR 50.54(a) process. Prior NRC approval is required of any changes to the quality assurance program that reduce the commitments in the program description as accepted by the NRC. Accordingly, the proposed license amendment removing these administrative requirements from the TS while utilizing documents subject to the controls of 10 CFR 50.54(a), results in an equivalent level of regulatory authority while providing for a more appropriate change control process.

Technical Specification/Process Matrix

TMI TS Section	TS Topic	PDMS QAP Section	Evaluation
6.5	Review and Audit		
6.5.1	Technical Review & Control	5	Equivalent
6.5.1.1	TS 6.7 Procedures	5	Equivalent
6.5.1.2	TS Appendix A	5	Note 1
6.5.1.3	Test & Experiments	14	Equivalent
6.5.1.4	Modifications	3	Note 2
6.5.1.5	TS Violations	5	Note 1
6.5.1.6	Reportable Events	5	Note 1

6.5.1.7	Cross-Disciplinary Reviews	5	Note 1
6.5.1.8	Written records for Technical Reviews	5 and 17	Equivalent
6.5.1.9	Qualifications for Responsible Technical Reviewers (RTRs)	5	Note 3
6.5.2	Independent Safety Review (ISR)		
6.5.2.1	Director responsibilities	Deleted	
6.5.2.2	Independence for ISRs	Deleted	
6.5.2.3 a through j	Technical Experience areas	Deleted	
6.5.2.4	Technical Consultants	Deleted	
6.5.2.5	Scope of ISR	Deleted	
6.5.2.5.a	UFSAR Changes	Deleted	
6.5.2.5.b	Safety-Related Procedure Changes	Deleted	
6.5.2.5.c	TS changes & License Amendments	Deleted	
6.5.2.5.d	Violations, Deviations and Reportable Events	Deleted	
6.5.2.5.e	Audit Report Summaries	Deleted	
6.5.2.5.f	Other matters involving plant	Deleted	
6.5.2.6	Qualifications for ISRs	Deleted	
6.5.2.7	ISR Records	Deleted	
6.5.3	Audits		
6.5.3.1	Audits performed in accordance with PDMS QAP	18 & Appendix A	Equivalent
6.5.3.1.a	Conformance to TS & License	18 & Appendix A	Equivalent
6.5.3.1.b	PDMS QAP activities	18 & Appendix A	Equivalent
6.5.3.1.c	Radiation protection Plan	18 & Appendix A	Equivalent
6.5.3.1.d	Fire Protection Program	18 & Appendix A	Equivalent
6.5.3.1.e	Independent Fire protection and loss prevention program-licensee personnel	18 & Appendix A	Equivalent
6.5.3.1.f	Independent Fire protection and loss prevention program-outside consultant	18 & Appendix A	Equivalent
6.5.3.1.g	ODCM	18 & Appendix A	Equivalent
6.5.3.1.h	Other areas of unit operation	18 & Appendix A	Equivalent
6.5.3.2	Audits report records	18 & Appendix A	Equivalent

Note 1: The change is equivalent with the proposed changes to PDMS QAP Section 5.2. The scope of, and requirements for, technical reviews and independent technical reviews are described in the SQR program implemented by Exelon/AmerGen Procedure AD-AA-102, "Station Qualified Review " (Enclosure 6). GPU Nuclear plans to use the elements of this procedure to perform independent technical reviews for TMI-2.

Note 2: The change is equivalent with the proposed changes to PDMS QAP Section 3.3

Note 3: SQRs are qualified to the education and experience requirements of ANSI/ANS-3.1 1978 to which the TMI station (Units 1 and 2) are committed.

5.0 **Regulatory Analysis**

5.1 No Significant Hazard Consideration

GPU Nuclear has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

No physical changes to the TMI-2 Facility, will occur as a result of this proposed amendment. The proposed changes will not alter the physical design or operational procedures associated with any plant structure, system, or component. As such, the change is administrative in nature and does not affect initiators of analyzed events or assumed mitigation of accidents.

The proposed changes involve the deletion of several administrative requirements from the Technical Specifications (TS). The TS requirements involve Technical Review and Control and Audits that are now controlled under the TMI-2 Post Defueling Monitored Storage Quality Assurance Plan (PDMS QAP).

In accordance with the guidance provided in NRC Administrative Letter 95-06, "Relocation of Technical Specification Administrative Controls related to Quality Assurance," the proposed changes are an acceptable method for removing technical specification quality assurance requirements.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes are administrative in nature. The proposed changes do not alter the physical design, safety limits, or safety analysis assumptions associated with the operation of the plant. Accordingly, the changes do not introduce any new accident initiators, nor do they reduce or adversely affect the capabilities of any plant structure, system, or component to perform their safety function.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No.

The proposed changes conform to NRC regulatory guidance regarding the content of plant Technical Specifications. The guidance is presented in Administrative Letter 95-06 and NUREG-1430. The relocation of these administrative requirements to the PDMS QAP will not reduce the quality assurance commitments as accepted by the NRC, nor reduce administrative controls essential to the safe operation of the plant. Future changes to these administrative requirements will be performed in accordance with NRC regulation 10 CFR 50.54(a), consistent with the guidance identified above. Accordingly, the replacement of TS requirements by existing proposed TMI-2 PDMS QAP requirements results in an equivalent level of regulatory control.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, GPU Nuclear concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

10CFR 50.36, Technical specifications

10 CFR 50.36, "Technical specifications," provides the regulatory requirements for the content required in a licensee's TS. 10 CFR 50.36(d)(5), Administrative Controls states: Administrative controls are the provisions relating to the organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner.

The NRC provided guidance for the content of TS in its "Final Policy Statement on Technical Specifications Improvement for Nuclear Power Reactors", 58 FR 39132, July 22, 1993. In particular, the NRC indicated that certain items could be relocated from the TS to licensee-controlled documents, and identified criteria to be used to determine the functions to be included in the TS. The NRC's policy statement provides that particular details of administrative controls may be relocated to licensee-controlled documents where section 50.54, 50.59, or other regulations provide adequate regulatory control. The NRC adopted revisions to 10 CFR 50.36, "Technical Specifications," pursuant to

which the rule was revised to codify and incorporate these criteria. In adopting the revision of the rule, the NRC indicated that the intent of these criteria could be utilized to identify the optimum set of administrative controls in the TS. The NRC further concluded that the specific content of the administrative controls section of the TS is, therefore, that information which the Commission deems essential for the safe operation of the facility and which is not already adequately covered by other regulations. Accordingly, the NRC has determined that requirements that are not specifically required under 50.36(d)(5), and are not otherwise necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety can be removed from TS administrative controls.

Consistent with this policy position, the NRC staff issued Administrative Letter (AL) 95-06, December 12, 1995, identifying TS administrative control requirements that qualify for relocation to licensee quality assurance control documents subject to the controls of 10 CFR 50.54(a). Requirements identified by AL 95-06 included review and audit, procedure review and approval, and record retention requirements. The scope of changes proposed herein conforms to the NRC staff position presented in AL 95-06.

NRC approved NUREG-1430, Standard Technical Specifications – Babcock and Wilcox Plants were developed based on the criteria in the "Final Commission Policy Statement on Technical Specifications Improvement for Nuclear Power Reactors," dated July 22, 1993, and subsequently codified in 10 CFR 50.36. The preface to these documents encourages licensees to adopt some or all of the improved TS into their existing TS. The TS sections proposed herein for relocation do not appear in the improved Standard Technical Specification (STS) presented in NUREG-1430, and accordingly, are not required to be in the TS.

The proposed license amendment to remove these administrative requirements while utilizing documents subject to the controls of 10 CFR 50.54(a) conforms to NRC guidance as stated above, and results in an equivalent level of regulatory control. GPU Nuclear has determined that the proposed changes do not require any exemptions or relief from regulatory requirements and do not affect conformance with any General Design Criteria.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 Environmental Consideration

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10).

Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 References

- 1) GPU Nuclear Post-Defueling Monitored Storage Quality Assurance Plan for Three Mile Island Unit 2 Revision 11, dated May 12, 2008
- 2) Letter from Pamela B. Cowan (AmerGen) to U.S.Nuclear Regulatory Commission, " Oyster Creek Technical Specification Change Request No. 336, TMI Unit 1 Technical Specification Change Request No. 330, Deletion of Technical Specification Requirements for Review and Audit, and Additional Administrative Changes," dated November 13, 2007 (ML073240040)

8.0 Precedence

- 1) Oyster Creek Nuclear Generating Station (OCNGS), and Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1) Re: Amendments to Relocate the Independent Onsite Safety Review Group Function to the Quality Assurance Topical Report (TAC NOS. MC2406 and MC2407), dated November 8, 2004 (ML042710014).

Enclosure 3

TMI-2 Technical Specifications Revised Pages

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DELETED

ADMINISTRATIVE CONTROLS

DELETED

DELETED

6.5.2 DELETED

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ADMINISTRATIVE CONTROLS

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Enclosure 4

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ADMINISTRATIVE CONTROLS

6.5 DELETED REVIEW AND AUDIT

6.5.1 DELETED TECHNICAL REVIEW AND CONTROL

~~The GPU Nuclear Cognizant Officer shall be responsible, through its contracted agent, the TMI-1 License holder for ensuring the preparation, review, and approval of documents required by the activities described in Sections 6.5.1.1 through 6.5.1.7 as assigned in the TMI review and approval matrix within his functional area of responsibility of assigned in the GPUN Review and Approval Matrix. Implementing approvals shall be performed at the cognizant manager level or above.~~

DELETED ACTIVITIES

~~6.5.1.1 Each procedure required by Section 6.7 and other procedures including those for tests and experiments and SUBSTANTIVE CHANGES thereto shall be prepared by a designated individual(s) or group knowledgeable in the area affected by the procedure. Each such procedure, and SUBSTANTIVE CHANGES thereto, shall be given a technical review by an individuals(s) or group other than the preparer, but who may be from the same organization as the individual who prepared the procedure or change.~~

~~6.5.1.2 Proposed changes to the Technical Specifications shall be reviewed by a knowledgeable individual(s) or group other than the individual(s) or group who prepared the change.~~

~~6.5.1.3 Proposed tests and experiments shall be reviewed by a knowledgeable individual(s) or group other than the preparer but who may be from the same division as the individual who prepared the tests and experiments.~~

~~6.5.1.4 Proposed modifications to unit structures, systems, and components necessary to maintain the PDMS condition as described in the PDMS SAR shall be designed by an individual/organization knowledgeable in the areas affected by the proposed modification. Each such modification shall be technically reviewed by an individual/group other than the individual/group which designed the modification but may be from the same group as the individual who designed the modification.~~

~~6.5.1.5 Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, shall be reviewed by a knowledgeable individual(s)/group other than the individual/group which performed the investigation.~~

~~6.5.1.6 All REPORTABLE EVENTS shall be reviewed by an individual/group other than the individual/group which prepared the report.~~

~~6.5.1.7 Individuals responsible for reviews performed in accordance with Section 6.5.1.1 through 6.5.1.6 shall include a determination of whether or not additional cross disciplinary review is necessary. If deemed necessary, such review shall~~

ADMINISTRATIVE CONTROLS

ACTIVITIES

be performed by the appropriate personnel. Individuals responsible for reviews considered under Sections 6.5.1.1, 6.5.1.3, and 6.5.1.4 shall render determinations in writing with regard to whether or not NRC approval is required pursuant to 10 CFR 50.59.

DELETED RECORDS

6.5.1.8 Written records of activities performed in accordance with Sections 6.5.1.1 through 6.5.1.7 shall be maintained in accordance with Section 6.9.

DELETED QUALIFICATIONS

6.5.1.9 Responsible Technical Reviewers shall meet or exceed the qualifications of ANSI/ANS 3.1 of 1978 Section 4.6 or 4.4 for applicable disciplines, or have 7 years of appropriate experience in the field of his or her specialty. Credit toward experience will be given for advanced degrees on a one-to-one basis up to a maximum of two years. Responsible Technical Reviewers shall be designated in writing.

6.5.2 DELETED INDEPENDENT SAFETY REVIEW

DELETED FUNCTION

6.5.2.1 The GPU Nuclear Cognizant Officer shall be responsible, through its contracted agent, the TMI-1 License holder, for ensuring the independent safety review of the subjects described in Section 6.5.2.5, as assigned in the TMI Review and Approval Matrix.

6.5.2.2 Independent safety review shall be completed by an individual or group not having direct responsibility for the performance of the activities under review, but who may be from the same functionally cognizant organization as the individual or group performing the original work.

6.5.2.3 GPU Nuclear, Inc. shall collectively have access to the experience and competence required to independently review subjects in the following areas:

- a. — Nuclear Unit operations
- b. — Nuclear engineering
- c. — Chemistry and radiochemistry
- d. — Metallurgy

ADMINISTRATIVE CONTROLS

FUNCTION (cont'd)

- e. — Instrumentation and control
- f. — Radiological safety
- g. — Mechanical engineering

- h. — Electrical engineering
- i. — Administrative controls and quality assurance practices
- j. — Other appropriate fields such as radioactive waste management operations associated with the unique characteristics of TMI-2.

6.5.2.4 Consultants may be utilized as determined by the GPU Nuclear Cognizant Officer to provide expert advice.

DELETED RESPONSIBILITIES

6.5.2.5 ~~The following subjects shall be independently reviewed by Independent Safety Reviewers (ISRs):~~

- a. ~~Written evaluations of changes in the facility as described in the Safety Analysis Report, of changes in procedures as described in the Safety Analysis Report, and of tests or experiments not described in the Safety Analysis Report, which are completed without prior NRC approval under the provisions of 10 CFR 50.59(e) (1). This review is to verify that such changes, tests or experiments did not involve a change in the Technical Specifications or requires NRC approval pursuant to 10 CFR 50.59. Such reviews need not be performed prior to implementation.~~
- b. ~~Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or requires NRC approval pursuant to 10 CFR 50.59(e). Matters of this kind shall be reviewed prior to submittal to the NRC.~~
- c. ~~Proposed changes to Technical Specifications or license amendments shall be reviewed prior to submittal to the NRC for approval.~~
- d. ~~Violations, deviations, and reportable events which require reporting to the NRC in writing. Such reviews are performed after the fact. Review of events covered under this subsection shall include results of any investigations made and the recommendations resulting from such investigations to prevent or reduce the probability of recurrence of the event.~~

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (cont)

- e. ~~Written summaries of audit reports in the areas specified in Section 6.5.3.~~
- f. ~~Any other matters involving the plant which a reviewer deems appropriate for consideration or which is referred to the independent reviewers.~~

DELETED QUALIFICATIONS

~~6.5.2.6 The ISRs shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five years of professional level experience in the area being reviewed or have nine years of appropriate experience in the field of his or her specialty. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.~~

DELETED RECORDS

~~6.5.2.7 Reports of reviews encompassed in Section 6.5.2.5 shall be maintained in accordance with Section 6.9.~~

6.5.3 DELETED AUDITS

~~6.5.3.1 Audits of unit activities shall be performed in accordance with the TMI-2 PDMS QA Plan. These audits shall encompass:~~

- a. ~~The conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions.~~
- b. ~~The performance of activities required by the PDMS QA Plan.~~
- c. ~~The Radiation Protection Plan and applicable implementing procedures.~~
- d. ~~The Fire Protection Program and implementing procedures.~~
- e. ~~An independent fire protection and loss prevention program inspection and technical audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.~~
- f. ~~An inspection and audit of the fire protection and loss prevention program by an outside qualified fire consultant.~~

ADMINISTRATIVE CONTROLS

6.5.3 AUDITS (can't)

- g. ~~The ODCM and implementing procedures.~~
- h. ~~Any other area of unit operation considered appropriate by the PDMS Manager or the GPU Nuclear Cognizant Officer.~~

DELETED RECORDS

~~6.5.3.2 Audit reports encompassed by Section 6.5.3.1 shall be forwarded for action to the management positions responsible for the areas audited and the GPU Nuclear Cognizant Officer within 60 days after completion of the audit. Upper management shall be informed in accordance with the TMI-2 PDMS QA Plan.~~

6.5.4 DELETED

Enclosure 5

Markup of TMI-2 PDMS QAP Revised pages

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3.0 DESIGN CONTROL

- 3.1 TMI-2 was originally designed and constructed in compliance with appropriate 10 CFR 50 Codes and Standards. Due to the non-operating and defueled status of TMI-2 during PDMS, there will no longer be any structures, systems, or components which perform a safety function. However, the TMI-2 Technical Specifications do identify certain structures, systems, and components required to be operable. Such structures, systems, and components are considered within PDMS QA Plan Scope and, thus, require the application of design controls on a graded basis should modifications be required. Systems and major components within PDMS QA Plan Scope are identified in a Component Record List (CRL) document.
- 3.2 To the extent defined in Section 2.0, measures shall be established for PDMS to ensure design criteria are included or correctly translated into design documents. These measures, as a minimum, shall ensure that applicable design inputs are identified and documented. Changes from approved design inputs shall be identified, approved, documented, and controlled. Inputs shall be translated into design output documents containing the technical and quality requirements that must be satisfied.
- 3.3 To the extent necessary, design control measures shall be implemented by controlled written procedures. Such procedures may address the following design activities:
- 3.3.1 The organizational structure, authority, and responsibility of personnel involved in preparing, reviewing, and approving design documents.
- 3.3.2 Design input requirements necessary to permit the correct performance of design process activities. ALARA considerations, if appropriate, shall be specified.
- 3.3.3 Design process activities sufficient to ensure that design inputs are correctly translated into specifications, drawings, procedures, or instructions.
- 3.3.4 Internal and external design interface controls and lines of communication among participating design organizations and across technical disciplines.
- 3.3.5 ~~Design verification methods such as design review or alternate calculations. Verification may be performed by any competent party not responsible for the original design.~~ **Design control measures shall be applied to verify the adequacy of design, such as by one or more of the following:**
- Performance of design reviews,
 - Use of alternate calculations,
 - Performance of qualification tests.

The results of design verification shall be documented including the identification of the verifier. Design verification shall be performed by competent and qualified individual(s) other than those who performed the original design, but may be from the same organization. This verification may be performed by the originator's supervisor,

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provided the supervisor did not establish the design approach, rule out certain design considerations, did not establish the design inputs used in the design, or the supervisor is the only individual in the organization competent to perform the review. In all cases, the design verification shall be completed prior to relying upon the component, system, structure, or computer program to perform its function.

The extent of the design verification required is a function of the importance of the function, the complexity of the design, the degree of standardization, the state of the art, and the similarity with previously proven designs.

- 3.3.6 Design and specification changes, including field changes, subject to design control measures.
- 3.3.7 Records of design activities shall be generated in sufficient detail to permit Nuclear Safety Assessment auditing as required by this Plan.

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5.0 INSTRUCTIONS, PROCEDURES, AND DRAWINGS

- 5.1 During the PDMS period, activities within PDMS QA Plan Scope shall be prescribed by and accomplished in accordance with written instructions, procedures, or drawings of a type appropriate to the circumstances. Procedural adherence shall be mandatory.
- 5.2 Standard guidelines for the format, content, review, and approval of instructions, procedures, and drawings shall be specified in division/department administrative procedures. Procedural documentation shall be prepared, reviewed, and approved by individuals knowledgeable in the area affected by the procedure. Technical and independent reviews shall be in accordance with TMI Review and Approval Matrix **Approved Procedures. Procedures within the scope of this quality assurance plan and changes to those documents shall be independently technically reviewed prior to implementation by a qualified individual knowledgeable in the area affected. The technical reviewer shall be an individual other than the originator. The reviewer shall determine if additional cross-disciplinary reviews are required to ensure all applicable technical disciplines are included in the review. The independent technical review shall ensure technical accuracy, compliance to regulatory requirements, and shall verify the originator's determination to whether items reviewed constitute a change to any licensing basis document.**

Technical reviewers shall be trained and qualified to perform the technical reviews. Technical reviewers shall have the experience and training required by applicable standards. Technical reviewers shall have experience in areas such as:

- **Chemistry**
- **Instrumentation and controls**
- **Mechanical and electrical systems**
- **Nuclear power technology**
- **Radiological controls**
- **Operations**
- **Engineering**

- 5.3 Typical procedure types that shall be established, as necessary, are:
- 5.3.1 Administrative Procedures - Organizational responsibilities, interface relationships, and general plant administrative implementation controls are specified.
- 5.3.2 Operating Procedures - Provide instructions in sufficient detail to safely operate plant systems and components required to be operable per the PDMS Technical Specifications.
- 5.3.3 Surveillance and Test Procedures - Provide detailed instructions for implementing PDMS Technical Specification surveillance and test requirements.
- 5.3.4 Maintenance Procedures - These include both corrective and preventive maintenance. Skills normally possessed by qualified maintenance personnel may not require detailed step-by-step delineation in written procedures.

Enclosure 6

Exelon/AmerGen Procedure, AD-AA-102, Station Qualified Review



Nuclear

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Level 3 – Information Use

STATION QUALIFIED REVIEW

1. PURPOSE

- 1.1. This procedure establishes the requirements for the site review and approval of procedures and other documents using the Station Qualified Reviewer (SQR) and Site Functional Area Manager (SFAM)/Plant Manager.
 - 1.1.1. This procedure by means of this statement, transitions all individuals qualified under the Independent Technical Review (ITR) program or Responsible Technical Reviewer (RTR) program to comparable qualifications in the Station Qualified Reviewer (SQR) program.
 - 1.1.2. This procedure replaces the Independent Technical Review and Responsible Technical Review programs and shall be used in lieu of either review when ITR or RTR is specifically called for.
- 1.2. This procedure applies to:
 - 1.2.1. Technical Review of administrative and implementing procedures at the stations.
 - 1.2.2. The review of the Offsite Dose Calculation Manual (ODCM), Core Operating Limits Report (COLR) and the Technical Requirements Manual (TRM).
 - 1.2.3. Proposed changes to the Technical Specifications, their Bases, and the Operating License.
- 1.3. This procedure does not apply to procedures within the Human Resources (HR), Business Operations (BO) categories, or technical welding procedures approved by the corporate welding engineer.

2. TERMS AND DEFINITIONS

- 2.1. SQR Review: A review performed by the SQR that is separate from the preparer that ensures that the document is technically and functionally accurate.
- 2.2. Cross-Disciplinary Review: A review of a document performed by one or more qualified individuals that have technical expertise in the areas addressed by the procedure. The intent of this review is to identify impacts on other organizations and ensure that the document is technically and functionally accurate relative to the Cross Disciplinary Reviewer's area of expertise.
- 2.3. Document: Generic terminology used throughout this procedure to refer to Procedures and other documents (TS, COLR, TRM, etc.) that are subject to SQR review.

3. **RESPONSIBILITIES**

3.1. **Licensing SFAM**

- Certifies SQR candidates.

3.2. **Plant Manager**

- Approves the appointment and designates qualified SQRs.

3.3. **Site Functional Area Manager (SFAM)**

- Authorizes documents reviewed and approved by the SQR unless PORC and / or Plant Manager authorization is required.
- Ensures an adequate complement of SQRs exist within functional area.
- Ensures that the change documentation package includes necessary elements (e.g. 50.59 / 50.54 / 72.48 reviews, documentation of cross-disciplinary reviews, etc).
- Approves/Authorizes editorial procedure changes.

3.4. **Station Qualified Reviewer**

- Performs the SQR review of new or revised documents and approves them if appropriate.
- Specifies the required reviews.
- Ensures that an appropriate cross-disciplinary review(s) of the procedure is performed by qualified individual(s).
- Determines who is qualified to perform cross-disciplinary review.
- Reviews the documentation package.
- Notifies the Licensing SFAM upon a job transfer to a new functional area in order to re-apply for SQR qualification for the new area.

Exelon NDE
Level III

Functions as SQR Reviewer for technical procedures in area of certification.
Performs the SQR review of new or revised NDE documents in area of certification and approves them if appropriate.
Ensures that an appropriate cross-disciplinary review of the procedure is performed as necessary.

4. **MAIN BODY**

4.1. **Station Qualified Review (SQR) Qualification Requirements**

- 4.1.1. **MEET** the requirements of the appropriate sections of ANSI/ANS-3.1 (or equivalent ANS/ANSI qualification requirements: e.g. ANSI N18.1-1971) that is committed to for the site.

Clinton

MAINTAIN Logic System Functional/System Functional review qualifications for Operation, Instrumentation and Control, and Electrical disciplines. **(CM-1)**

1. **COMPLETE** a Station Qualified Reviewer Candidate Qualification Application (AD-AA-102-1002, Station Qualified Reviewer Qualifications).
- 4.1.2. **If** an SQR transfers into a different Functional Area Group, **then** the SQR shall **NOTIFY** the Licensing SFAM.
1. **COMPLETE** a Station Qualified Reviewer Candidate Qualification Transfer Application (AD-AA-102-1002, Station Qualified Reviewer Qualifications).
- 4.1.3. Licensing SFAM shall **ENSURE** that appropriate qualification re-evaluations are performed prior to reassigning the SQR to a different functional area.
- 4.2. **Station Qualified Review Scope**
- 4.2.1. The SQR shall only approve documents that they are qualified to review/approve.
- 4.2.2. The following items require Station Qualified Review:
- Administrative and implementing procedures for the station required by the stations' Technical Specifications and Quality Assurance Program.
 - Offsite Dose Calculation Manual (ODCM), Core Operating Limits Report (COLR) and the Technical Requirements Manual (TRM).
 - Proposed changes to the Technical Specifications, their Bases, and the Operating License
1. **If** a procedure is determined to require PORC review in accordance with the current approved PORC procedure, **then** the SQR shall **APPROVE** the document, however, PORC shall review / recommend the document for approval as appropriate.
- 4.2.3. Editorial changes to procedures do **not** require SQR review/approval.

4.3. SQR Review

- 4.3.1. The SQR shall not be the same individual as the preparer of the document.
- 4.3.2. The SQR and the SFAM may be the same individual.
- 4.3.3. **PROVIDE** the review, confirmation, and/or substantiation of the appropriateness of a proposed document change activity including adherence to regulatory, quality, and Exelon Nuclear requirements.
- 4.3.4. **RENDER** a determination of whether or not a cross-disciplinary review(s) of the document change activity is necessary.
 - 1. **ENSURE** that adequate cross-disciplinary review(s) have been performed by qualified individual(s), to ensure that the document is appropriate for the intended application.
 - 2. The cross-disciplinary reviewer(s) should inform the SQR of any previous involvement with the document change activity under review so that the SQR can knowledgably use the cross-disciplinary review to support approval or require a different cross-disciplinary reviewer.
- 4.3.5. **When** revisions involve interpretation, changes in technical specifications, or are complicated changes, **CONSIDER** consulting with a peer.

4.4. Site Functional Area Manager (SFAM) Authorization

- 4.4.1. **ENSURE** that the documentation package for the activity is complete including appropriate regulatory reviews (e.g. 10CFR50.59 / 10CFR 72.48 / 10CFR 50.54) and other review documentation.

5. DOCUMENTATION

- 5.1. Completed change documentation package is a quality record.
- 5.2. Completed SQR qualifications are placed in the candidates training record until such time as those training records are archived by Records Management.

6. REFERENCES

6.1. Commitments

6.1.1. Clinton

CM -1, Licensee Event Report 1997-031, Condition Reports 1-97-12-304, and 1-99-07-064 (Clinton Station Specific portion of step 4.1.1.)

6.2. User References

- 6.2.1. LGS / PBAPS UFSAR section 13
- 6.2.2. Quality Assurance Program
- 6.2.3. TVA plants, SER Tac Nos, 5105, 5106, 5107, 5054, 5055, and 5056, dated August 26, 1999
- 6.2.4. Procedures:
 - 1. AD-AA-101, Processing of Procedures
 - 2. LS-AA-104, Exelon 50.59 Review Process
- 6.2.5. Training & Reference Material:
 - 1. AD-AA-102-1001, SQR Reviewers Guide
 - 2. AD-AA-102-1002, SQR Qualifications

6.3. Writer's Reference

- 6.3.1. ANSI/ANS-3.1
- 6.3.2. Regulatory Guide 1.33
- 6.3.3. ANSI N18.1-1971

7. ATTACHMENTS

- 7.1 Attachment 1, SQR Process Flowchart

ATTACHMENT 1
SQR Process Flowchart
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