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10 CFR 50.90

December 10, 2008  
5928-08-20238

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555-0001

Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
Possession Only License No. DPR 73  
NRC Docket No. 50-320

Subject: Response to Request for Additional Information on Technical Specification  
Change Request (TSCR) No. 86  
Deletion of Technical Specification Sections 6.5, Review and Audit

Reference: 1) Letter from U.S NRC to Joseph J. Hagan, "Request for Additional Information  
(RAI) on Technical Specification Change Request No. 86 for the Three Mile  
Island Nuclear Station, Unit 2," dated November 12, 2008

Our letter dated June 11, 2008, as supplemented by letter dated September 15, 2008,  
forwarded the Technical Change Request No. 86 (TSCR 86) for Three Mile Island Nuclear  
Station (TMI), Unit 2. TSCR 86 requests deletion of Technical Specification 6.5, Review and  
Audit. In Reference 1, NRC stated that TSCR 86 was accepted for review on July 11, 2008 and  
has determined that additional information is required to complete the review. A restatement of  
the RAI and our response is included in the enclosure to this letter.

No new regulatory commitments are established by this submittal.

If any additional information is needed, please contact Adam Miller at (717).948-8128.

NMSS01  
NRB

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 10<sup>th</sup> day of December 2008.

Respectfully,

A handwritten signature in black ink, appearing to read "J. Hagan", written in a cursive style.

Joseph J. Hagan  
President and Chief Nuclear Officer

Enclosure: 1) Response to RAI for TSCR No. 86

cc: USNRC Region I Administrator  
USNRC TMI-2 Senior Project Manager  
USNRC TMI-2 Inspector  
USNRC TMI-1 Senior Resident Inspector  
Director, Bureau of Radiation Protection-PA Department of Environmental Resources  
Chairman, Board of County Commissioners of Dauphin County  
Chairman, Board of Supervisors of Londonderry Township  
File No. 08020

**Enclosure 1**

**Response to RAI for TSCR No. 86**

REQUEST FOR ADDITIONAL INFORMATION  
THREE MILE ISLAND NUCLEAR STATION, UNIT 2  
TECHNICAL SPECIFICATION CHANGE REQUEST 86

DOCKET NO. 50-320

By letter dated June 11, 2008, as supplemented by letter dated September 15, 2008, GPU Nuclear, Inc. submitted Technical Specification Change Request No. 86 (TSCR 86), for the Three Mile Island Nuclear Station, Unit 2 (TMI-2). TSCR 86 requests deletion of Technical Specification 6.5, Review and Audit. In reviewing GPU Nuclear's submittal, the U.S. Nuclear Regulatory Commission staff has determined that the following information is needed to complete its review.

1. Technical Specification (TS) 6.5.1 provides that the GPU Nuclear Cognizant Officer shall be responsible, through its contracted agent, the TMI, Unit 1 license holder, for ensuring the preparation, review, and approval of documents required by the activities described in TS 6.5.1.1 through 6.5.1.7, as assigned in the TMI Review and Approval Matrix. Implementing approvals shall be performed at the cognizant manager level or above.

Your June 11, 2008, submittal notes that an equivalent requirement is provided in Section 5.0 of the GPU Nuclear Post-Defueling Monitored Storage Quality Assurance Plan (QAP). However, QAP Section 5.0 does not include this requirement. Please indicate where this requirement is included in the QAP or other licensing document, and thus, why deletion of this TS is appropriate.

In addition, your proposed changes to Section 5.2 of the QAP delete reference to the TMI Review and Approval Matrix. Please indicate where the QAP addresses the information in this matrix (e.g., organizations and levels of management that are responsible for review and approval of various documents or products), provide revisions to the QAP that address this area, or describe why this deletion does not result in a reduction of quality controls previously accepted by NRC.

**Response:**

The level of procedural process administrative detail as described in the TMI Review and Approval Matrix (as embodied in TMI Policy and Procedure Manual 1000-ADM 1291.01 Exhibit 1B) is beyond the current requirements for TS 6.5, as specified in 10CFR36(d)(5), Administrative Controls. The level of procedural process administrative detail as described in the TMI Review and Approval Matrix is also beyond the current requirements for quality assurance plans as specified in 10CFR50 Appendix B. Note that since TMI-2 is in a non-operating and defueled status, there are no longer any structures, systems, or components that perform a safety related function. Therefore, the quality assurance requirements of 10CFR50, Appendix B, do not specifically apply. There is no intent to transfer the Review and Approval Matrix from the technical specifications to the quality assurance plan. It is requested to delete this requirement and replace with the administrative process for procedure review and approval that is used at other Exelon/AmerGen plants.

A similar proposal for operating plants, TMI Unit 1 and Oyster Creek Nuclear Generating Station, is in the process of being approved by NRC and the associated Exelon/AmerGen Quality Assurance Topical report (QATR) does not contain the level of detail as specified in the TMI Review and Approval Matrix. That level of detail is controlled in Exelon/AmerGen administrative procedure AD-AA-101, Processing of Procedures and T&RMs [Training & Reference Material]. The current proposal is to delete the TMI Review and Approval Matrix and implement similar administrative controls performed at other Exelon/AmerGen plants.

2. TS 6.5.1.1 provides that procedures required by TS 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 individual(s) or group other than the preparer, but who may be from the same organization as the individual who prepared the procedure or change.

Your June 11, 2008, submittal notes that an equivalent requirement is provided in Section 5.0 of the QAP. The revised Section 5.2 of the QAP that was included in your submittal does address this review process. However, QAP Sections 2.3 (which addresses the scope of the QA Program) and 5.3 do not appear to address procedures for flood protection program implementation, which is specified in TS 6.7.1. Please indicate where flood protection procedures are addressed in the QAP, provide revisions to the QAP that address this area, or provide additional justification for your request that this TS be deleted.

**Response:**

Flood procedures would be included under the general category for QAP 2.3.12, Additional items/ activities deemed necessary by plant management. The procedure types listed in QAP 5.3 are not meant to be all-inclusive and are prefaced with the general introductory statement "Typical procedure types...." In general, flood protection procedures, and their subsequent revisions, would be considered under the general category of Operating Procedures and would receive an independent technical review. In order to eliminate possible future misinterpretations, the QAP 5.3.2 will be amended, as indicated in the attached mark-up, that the flood protection program is included in the Operating Procedure category.

3. TS 6.5.1.2 provides that proposed changes to the TS shall be reviewed by a knowledgeable individual or group other than the individual or group who prepared the change.

Your June 11, 2008, submittal notes that this TS is equivalent to the proposed changes to the QAP Section 5.2, and that the Station Qualified Review (SQR) program and its implementing procedure, AD-AA-102, will be used to perform independent technical reviews for TMI-2. However, it appears that the QAP does not specifically state that proposed changes in TS will be reviewed in accordance with the SQR program. Please specify where the QAP states that proposed changes in TS will be reviewed in accordance with the SQR program, provide revisions to the QAP that address this area, or provide additional justification for your request that this TS be deleted.

**Response:**

The QAP 5.2 section will be amended, as indicated in the attached mark-up, that the independent technical reviews will be performed in accordance to the Station Qualified Review (SQR) Program.

4. TS 6.5.1.3 provides that 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.

Your June 11, 2008, submittal indicates that an equivalent requirement is located in Section 14.0 of the QAP. However, Section 14.0 of the QAP does not appear to address the review of proposed tests and experiments. Also, QAP Section 11.0 ("Test Control") also does not appear to address the review of proposed tests and experiments. Please describe where the equivalent requirement is located in the QAP, provide revisions to the QAP that address this area, or provide additional justification for your request that this TS be deleted.

**Response:**

Proposed tests and experiments would be implemented by procedures that fall under the QAP 5.3.3 Surveillance and Test Procedure category. Since they are in scope procedures, they, and their revisions, would fall under the requirements of QAP 5.2 requirements and would receive an independent technical review in accordance with the SQR program. In order to eliminate possible future misinterpretations, the QAP 5.3.3 will be amended, as indicated in the attached mark-up, that proposed tests and experiments are included in the Surveillance and Test Procedure category.

5. TS 6.5.1.5 provides that investigation of all violations of the TS, 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.

Your June 11, 2008, submittal notes that the this TS is equivalent to the proposed changes to the QAP Section 5.2, and that the SQR program and its implementing procedure, AD-AA-102, will be used to perform independent technical reviews for TMI-2. However, Section 5.0 of the QAP does not address review of investigation of TS violations. Also, the SQR program does not apply to review of investigation of TS violations. Please describe where the equivalent requirement is located in the QAP, provide revisions to the QAP that address this area, or provide additional justification for deletion of this TS (e.g., explain what review or corrective action programs at TMI-2 would address this area).

**Response:**

It is desired that TMI-2 follow the same processes in place for TMI-1. TMI-1, under the Exelon/AmerGen QATR would perform an independent review under the Corrective Action Program for this category of events. The QAP 16.4 will be amended, as indicated in the attached mark-up, to include requirements consistent with the Exelon/AmerGen QATR 2.2 that an independent review body reviews violations, deviations and reportable events that require a report to the NRC.

6. TS 6.5.1.6 provides that all reportable events shall be reviewed by an individual/group other than the individual/group which prepared the report.

Your June 11, 2008, submittal notes that the this TS is equivalent to the proposed changes to the QAP Section 5.2, and that the SQR program and its implementing procedure, AD-AA-102, will be used to perform independent technical reviews for TMI-2. However, Section 5.0 of the QAP does not address review of reportable events. Also, the SQR program does not apply to review of reportable events. Please describe where the equivalent requirement is located in the QAP, provide revisions to the QAP that address this area, or provide additional justification for deletion of this TS (e.g., describe what programs at TMI-2 would apply to this area).

**Response:**

The QAP will be amended as described in response to Question 5

7. TS 6.5.1.7 provides that individuals responsible for reviews performed in accordance with TS 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 be performed by the appropriate personnel. Individuals responsible for reviews considered under TS 6.5.1.1 [procedures], 6.5.1.3 [tests and experiments], and 6.5.1.4 [modifications] shall render determinations in writing with regard to whether or not NRC approval is required pursuant to 10 CFR 50.59.

Your June 11, 2008, submittal notes that the this TS is equivalent to the proposed changes to the QAP Section 5.2, and that the SQR program and its implementing procedure, AD-AA-102, will be used to perform independent technical reviews for TMI-2. The proposed changes to Section 5.2 of the QAP address cross-disciplinary reviews for instructions, procedures, and drawings, and the SQR program addresses cross-disciplinary reviews for procedures and changes to TS. However, cross-disciplinary reviews of tests and experiments (TS 6.5.1.3), modifications (TS 6.5.1.4), investigation of TS violations (TS 6.5.1.5), and reportable events (TS 6.5.1.6) are not covered in the QAP or the SQR program procedure. Please describe where the equivalent requirement is located in the QAP, provide revisions to the QAP that address this area, or provide additional justification for deletion of this TS (e.g., explain what programs at TMI-2 would apply to this area).

Also, neither QAP Section 5.2 nor the SQR program procedure include a requirement for reviewers to render determinations in writing with regard to whether NRC approval is required, pursuant to 10 CFR 50.59, for reviews considered under TS 6.5.1.1 [procedures], 6.5.1.3 [tests and experiments], and 6.5.1.4 [modifications]. Please describe where the

equivalent requirement is located in the QAP, provide revisions to the QAP that address this area, or provide additional justification for deletion of this TS (e.g., explain what programs at TMI-2 would apply to this area).

**Response:**

Tests and Experiments will be implemented as special test procedures and will receive a cross-disciplinary review in accordance with the SQR program.

Modifications do not receive a cross-disciplinary review in accordance with the SQR program described in QAP 5.2. However, modifications will receive an independent design verification review in accordance with the proposed QAP 3.3.5 markups included with our original submittal, dated June 11, 2008. Although the words "cross-disciplinary review" are not explicitly contained in QAP 3.3.5, the modification process contains design control measures that require a multidiscipline review process whereby each discipline (i.e., mechanical, electrical, structural, I&C, etc.) employed receives an independent design verification by an individual/group other than the originator individual/group. The Design Reviewer signature of a configuration change package documents that the signer has performed an overall review and assured that any required discipline reviews have been completed. The collective design verification is the equivalent of the cross-disciplinary review as performed for a procedure. The process is controlled in accordance with Exelon/AmerGen CC-AA-103, Configuration Change Control for Permanent Physical Plant Changes.

Tech Spec Violations and Reportable events will receive an independent technical review as described in Question 5 and 6 Responses.

Procedures, tests and experiments and modifications, and their revisions, receive a review in accordance with 10CFR50.59. The 50.59 review preparer and independent reviewer are required to render determinations in writing with regard to whether prior NRC approval is required. While the SQRs and modification design reviewers are not required to render determinations in writing with regard to whether prior NRC approval is required, they are required to review the 50.59 review performed for these activities.

8. TS 6.5.1.9 provides that 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 seven 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.

Your June 11, 2008, submittal notes that this TS is equivalent to QAP Section 5.0, and that the 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. However, the SQR program does not apply to reviews of tests and experiments (TS 6.5.1.3), modifications (TS 6.5.1.4), investigation of TS violations (TS 6.5.1.5), and reportable events (TS 6.5.1.6). Please describe where equivalent requirements for reviewer qualifications are provided in the QAP or in other programs at TMI-2 that apply to reviews of the areas noted above.

**Response:**

The SQR program does apply to reviews of tests and experiments as described in Question 4 Response.

Modifications receive independent technical reviews by qualified individuals/groups under the design verification process. TMI-2 modifications design verification follows the same process that is used for TMI-1 modifications. Individual performing TMI-1 design verification (Design Reviewers) are qualified to the education and experience requirements of ANSI/ANS 3.1 1978.

TS violations (TS 6.5.1.5), and reportable events will receive independent technical reviews as described in Question 5 Response.

In addition, the QAP 2.12 will be amended, as indicated in the attached mark-up, to include a statement that the verifiers (independent technical reviewers, Design Reviewers) comply with the qualification requirements of ANSI/ANS 3.1-1978

9. TS 6.5.2, "Independent Safety Review," provides for an independent review of various subjects or products and provides the requirements for independent safety reviewer qualifications.

Your June 11, 2008, submittal requests deletion of TS 6.5.2. Your justification for this deletion is that since there are no structures, systems, and components (SSCs) that perform a safety function at TMI-2, then "technically, there cannot be independent safety reviews." However, TS 6.5.2 does not address safety-related SSCs. Therefore, the justification provided for the deletion of TS 6.5.2 is not applicable. Please provide justification for your proposed deletion of TS 6.5.2.

**Response:**

The original purpose of the ISR was to replace the Med Ed Corporate Technical Support Staff (Generation Review Committee) review of the various subjects or products listed in TS 6.5.2 that invariably involved safety related systems. There is no current Generation Review Committee organization at TMI-2, nor are there safety related systems. The original licensing basis for the reason to establish an ISR (as documented in an NRC SER (Reference 1)) no longer exists, therefore, the requirement to conduct ISRs is no longer required. In addition, based on the PDMS condition of the facility and the lessened probability and consequences of previously analyzed accidents, the ISR program is no longer needed.

10. TS 6.5.3 provides requirements for audits.

Your June 11, 2008, submittal notes that this TS is equivalent to Section 18.0 and Appendix A of the QAP, which address audits and audit frequencies. The proposed deleted TS are encompassed within these sections of the QAP, for the most part. However, TS 6.5.3.2 notes that audit reports 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. Section 18.6 of the QAP notes that audit reports shall be issued in a "timely manner." Please indicate whether Section 18.6 of the QAP will be revised to be consistent with TS 6.5.3.2 or describe how programs or procedures at TMI-2 dictate similar requirements.

**Response:**

The TMI-2 QAP 18.6 will be amended, as indicated in the attached mark-up, to include a statement that Audit reports will be issued within 60 days to the management of the assessed organization.

11. Your September 15, 2008, supplemental submittal proposes to delete the reference to TS 6.5.1, in TS 6.7.2. Your submittal also proposes to delete references to TS 6.5.1.9 and TS 6.5.1, in TS 6.7.3. However, deletion of these TS references removes the overall technical review requirements for procedures, including requirements for qualifications for the technical reviewers. Please indicate whether your proposed changes to TS 6.7.2 and TS 6.7.3 will include a reference to the QAP, as a replacement for the deletion of the references to TS 6.5.1 and TS 6.5.1.9, and please submit any additional proposed changes to the TS.

**Response:**

NUREG 1430 STS for Sections 5.4, Procedures and 5.5, Programs and Manuals do not contain procedural technical review requirements and technical reviewer qualification requirements. Overall unit staff qualification requirements are contained in TMI-2 TS 6.3.1, and meets ANSI N 18.1-1971 for comparable technical staff verifier positions. It is desired to maintain the same qualifications for SQRs for both TMI1 and TMI-2, therefore, the QAP 5.2 will be amended, as indicated in the attached mark-up to include a statement that SQRs will be qualified ANSI/ANS 3.1 of 1978.

12. Please include a revised "Technical Specification/Process Matrix" in your response to this request for additional information.

**Response:**

Technical Specification/Process matrix is revised to match discussions in Questions 1 through 11 Responses:

### 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	Note 2
6.5.1.4	Modifications	3	Note 3
6.5.1.5	TS Violations	5	Note 4
6.5.1.6	Reportable Events	5	Note 4
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 5
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	Note 6

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. In addition, the QAP 5.2 will be revised to state that independent technical reviews will be performed in accordance with the SQR Program.

Note 2: Proposed tests and experiments are considered special tests under the scope of QAP 5.3.3.

Note 3: The change is equivalent with the proposed changes to PDMS QAP Section 3.3 and use of Exelon/AmerGen procedure CC-AA-103.

Note 4: QAP 16.4 will be revised to indicate that TS violations and Reportable Events will receive an independent technical review in accordance with the CAP program.

Note 5: SQRs are qualified to the education and experience requirements of ANSI/ANS-3.1 1978 to which the TMI-1 is committed. QAP 2.12 will be revised to state that the TMI-2 verifiers (independent technical reviewers, Design Reviewers) comply with the education and experience requirements of ANSI/ANS 3.1-1978.

Note 6: QAP 18.6 will be revised to state that Audit Reports will be issued to management within 60 days.

13. Please indicate whether the QAP (e.g., Sections 2.17, 18.2, and 18.9) will be updated to reflect the proposed deletion of TS 6.5 requirements.

**Response:**

QAP Sections 2.17, 18.2, and 18.9 will be amended, as indicated in the attached mark-up, to remove references to deleted sections of the Technical Specifications.

14. Please indicate whether TSCR 86 received the reviews required by TS 6.5.1.2, 6.5.1.7, and 6.5.2.5.c.

**Response:**

TSCR 86 has received the reviews required by TS 6.5.1.2, 6.5.1.7, and 6.5.2.5.c.

Reference 1.

NRC SER Supporting No. 77 to Facility Operating License No. DPR-50, Docket No. 50-289, dated April 28, 1982.

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- 2.9 The PDMS QA Plan shall be maintained in accordance with written procedures that comply with appropriate regulatory requirements. Copies of the Plan may be distributed as "Controlled" or "Uncontrolled" copies in accordance with approved document control procedures. Changes to this Plan shall be incorporated into implementing procedures in accordance with an approved document control process. .
- 2.10 The effectiveness of the QA Program is evaluated and reported to the Vice President GPU Nuclear Oversight and the GPU Nuclear Cognizant Officer through the surveillance, monitoring, and auditing functions. Vice President GPU Nuclear Oversight shall be responsible for evaluating deficiencies for the detection of any adverse quality trends.
- 2.11 Records of commitments to regulatory requirements are maintained by the Licensing (Regulatory Engineering, etc.) organization. The TMI-2 PDMS SAR and associated License form the initial basis of these commitments. They must be complied with in conjunction with this PDMS QA Plan.
- 2.12 The GPU Nuclear QA Program includes requirements for formal indoctrination and training/retraining programs of personnel performing or verifying activities within PDMS QA Plan Scope. These programs are implemented by appropriate training plans and procedures/ AND VERIFIERS COMPLY WITH THE QUALITY REQUIREMENTS OF ANSI/ANS 3.1-1978.
- 2.13 QA programs and implementing procedures for suppliers or contractors providing materials and services for GPU Nuclear which are covered under the scope of this QA Program shall be subject, when specified in procurement documents, to review and acceptance by Vice President GPU Nuclear Oversight or his designee prior to the commencement of any activity within PDMS QA Plan Scope.
- 2.14 It is the responsibility of the Vice President GPU Nuclear Oversight, supported by his staff, to provide for the effective administration of this Plan. Accordingly, all queries regarding the scope or interpretation of the Plan shall be addressed to the Vice President GPU Nuclear Oversight. Disputes involving quality arising from a difference of opinion, shall, if possible, be resolved at the level at which such disputes occur. If this is not possible, the difference of opinion shall be escalated through supervisory/management levels until resolution is achieved.
- 2.15 Quality Verification (Inspection Services, Quality Control, etc.) shall make the decision on matters concerning inspection and acceptance to established requirements. The director of the applicable engineering group shall make the decision on matters concerning interpretation of technical requirements or design changes.
- 2.16 Organizations that are implementing approved nuclear QA Programs may apply those programs, as necessary, in support of this Plan.

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2.17 Independent oversight is provided by the TMI-2 Company Nuclear Review Board (CNRB). The CNRB serves to independently assure that the TMI-2 structures, systems and components are maintained so as to protect the health and safety of the workers, the public and the environment and to enable effective and efficient dismantlement and decommissioning in the future. The committee is sponsored by the Vice President GPU Nuclear Oversight and advisory to the GPU Nuclear Cognizant Officer.

2.17.1 The responsibilities of the TMI-2 CNRB include the following:

- 2.17.1.1 Review trends of information obtained through PDMS surveillance and inspections to ascertain the overall stability of TMI-2 systems, structures and components.
- 2.17.1.2 Review evaluations made pursuant to 10 CFR 50.59, audit reports, corrective action program reports, Independent On-Site Safety Review Group Reports, and any other license related material forwarded by AmerGen to the GPU Nuclear Cognizant Officer to ensure that operational related concerns have been properly resolved. *THE STATION QUALIFIED REVIEW (SQR) PROGRAM.*
- 2.17.1.3 Review AmerGen activities associated with TMI-2 Technical Specification 6.5.1 "Technical Review and Control" to ensure that any GPU Nuclear concerns associated with this Technical Specification are identified.
- 2.17.1.4 Review activities and events at other permanently shutdown nuclear power plants and related facilities to determine if a similar event could occur at TMI-2 and make appropriate recommendations.
- 2.17.1.5 Conduct periodic physical walk-downs of the facility to independently assess the overall stability of TMI-2 systems, structures and components. Walk-downs may include independent monitoring and sampling.
- 2.17.1.6 Assess the impact of TMI-1 activities that interface with TMI-2.
- 2.17.1.7 Identify work required to preserve the stability of TMI-2 and report the need for such work to the GPU Nuclear Cognizant Officer.
- 2.17.1.8 Provide an independent annual report to the FirstEnergy Nuclear Committee of the Board.

2.17.2 The collective expertise/qualifications for the TMI-2 CNRB shall include:

- 2.17.2.1 Quality Assurance
- 2.17.2.2 Radiological
- 2.17.2.3 Environmental

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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 Approved Procedures AND THE SQR PROGRAM. 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

ANSI/ANS 3.1-1978

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. INCLUDING THE FLOOD PROTECTION PROGRAM

5.3.3 Surveillance and Test Procedures - Provide detailed instructions for implementing PDMS Technical Specification surveillance and test requirements. INCLUDING PROPOSED TESTS AND EXPERIMENTS AND OTHER 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.

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## 16.0 CORRECTIVE ACTION

16.1 Section 15.0 of this Plan describes the program that will be established to identify and control nonconforming items, services, and activities within PDMS QA Plan Scope during the PDMS period. Integral to the program to control nonconformances, requirements to accomplish prompt and effective corrective action shall be established. Requirements for the corrective action program shall be included in appropriate written procedures.

16.2 Nonconformances shall be evaluated to determine the cause of the condition and the need for corrective action. Evaluations and resulting dispositions shall be made by competent personnel. Nonconformances shall be dispositioned "scrap," "repair," "rework," "use-as-is," or an appropriate administrative correction. Corrective action necessary to preclude recurrence of nonconformances shall also be determined and implemented, as appropriate.

16.3 Management controls shall be established to ensure that required corrective actions are being addressed by responsible organizations in a timely manner. Disputes regarding corrective action issues shall be escalated to appropriate levels of management for resolution, if necessary. Follow-up activities shall be conducted to verify implementation of corrective actions and to close-out corrective action documentation.

16.4 Significant nonconformances (e.g., violations reportable to the NRC) shall be documented and reported to appropriate levels of GPU Nuclear management. Such reports shall identify the nonconformance, its cause, and the corrective action taken.

16.5 Records of nonconformances and their associated corrective actions shall be maintained in accordance with the Technical Specifications and governing administrative procedures. Periodically, these records shall be reviewed and analyzed to identify adverse quality trends, if any. Results of significant adverse trends will be reported to the appropriate levels of management.

An independent review body reviews violations, deviations and reportable events that require a report to the NRC in accordance with regulatory requirements and company procedures. This includes the review of results of any investigations made and the recommendations resulting from such investigations. These include items such as:

- events, as defined in applicable site technical specifications.
- significant operating abnormalities or deviations from normal or expected performance of plant safety-related structures, systems, or components.
- violations of applicable codes, regulations, orders, technical specifications, license requirements or internal procedures or instructions having safety significance.

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## 18.0 AUDITS

- 18.1 During PDMS, a system of planned and scheduled audits shall be established for both GPU Nuclear and supplier functions which affect items and activities within PDMS QA Plan Scope. Audits include an objective evaluation of practices, procedures, and instructions including an independent review of activities, items, and records within PDMS QA Plan Scope which demonstrate effective implementation. The audit system shall be defined and implemented in accordance with written procedures and is a Level III verification activity as defined in Section 2.0 of this Plan.
- 18.2 Audit areas required by the TMI-2 Technical Specifications shall be scheduled and conducted in compliance with Appendix A. Audit schedules shall be periodically reviewed and revised, as necessary, to ensure that appropriate audit coverage is maintained. Unscheduled audits may be conducted at any time or as requested by responsible GPU Nuclear management.
- 18.3 An individual audit plan describing the audit to be performed shall be developed and documented by the auditing organization. This plan shall identify the audit scope, the requirements, the activities to be audited, the applicable documents, and written procedure or checklists to be used in performing the audit.
- 18.4 Audits shall be performed by trained and qualified personnel not having direct responsibilities in the areas being audited. Qualification and training requirements shall be established and documented, and records of qualifications shall be maintained and kept current. Personnel selected for audit assignments shall have experience or training commensurate with the scope, complexity, or special nature of the activities to be audited. For each audit, an appropriately qualified individual shall be appointed as audit team leader. Other audit team members shall be utilized as required and will be classified as either auditors or technical specialists, depending on their function on the audit team.
- 18.5 Audits shall be conducted in accordance with approved procedures and/or checklists. Audited organizations shall provide sufficient support to assure the accuracy of audit results. Selected elements of the QA program shall be audited to the depth necessary to determine whether or not they are being implemented effectively. Objective evidence shall be examined. Conditions requiring prompt corrective action shall be reported immediately to management of the audited organization. At the conclusion of the audit, a post-audit conference shall be held with management of the audited organization to discuss audit results and present any adverse audit findings (i.e., nonconformances). WITHIN 60 DAYS AFTER COMPLETION OF THE AUDIT.
- 18.6 Audit reports shall be issued in a timely manner following performance of the audit. Reports shall contain a summary of audit results, an evaluation of QA Program implementation, and a description of adverse findings, if any. Audit reports shall be distributed to responsible management in both the audited and the auditing organizations. In addition, all audit reports shall be distributed to the Vice President GPU Nuclear Oversight and the GPU Nuclear Cognizant Officer.

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- 18.7 Management of the audited organization or activity shall review and investigate any adverse audit findings to determine and schedule appropriate corrective action including action to prevent recurrence. A response shall be made as requested by the audit report, giving results of the review and investigation. Responsible Audit organizations shall conduct follow-up activities to verify that appropriate corrective actions have been taken in a timely manner.
- 18.8 Audit findings shall be periodically reviewed and analyzed to identify adverse quality trends, if any. Results of these reviews shall be reported to management and the Vice President GPU Nuclear Oversight and the GPU Nuclear Cognizant Officer. Section 16.0 of this Plan addresses trending activities associated with other types of nonconformance report documentation.
- 18.9 Records of audit activities shall be maintained as required by the Technical Specifications and audit system implementing procedures.