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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

August 14, 1979

Docket No. 50-219

Mr. I. R. Finfrock, Jr.
Vice President - Generation
Jersey Central Power & Light Company
Madison Avenue at Punch Bowl Road
Morristown, New Jersey 07960

Dear Mr. Finfrock:

We are reviewing the Jersey Central Power & Light Company Revision 2 to the Operational Quality Assurance Plan transmitted by your letter dated June 30, 1978.

Based on our preliminary review of your submittal we find that we need additional information to continue our review. The enclosure describes the additional information required and states the staff position on various items in the Quality Assurance Plan. If you have any questions concerning the enclosure, please contact Stanley Nowicki at (301) 492-7218.

Sincerely,

Dennis L. Ziemann

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Operating Reactors

Enclosure:
Request for Additional
Information

cc:
See next page

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cc
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ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION AND STAFF POSITIONS ON THE OPERATIONAL QUALITY ASSURANCE PLAN FOR THE OYSTER CREEK NUCLEAR GENERATING STATION

1)	Section (II)	Please provide Jersey Central Power & Light Company's qualification requirements for the Manager - Operational Quality Assurance and the Quality Assurance Supervisor.
2)	Section (II & XII)	The Operational Quality Assurance Plan states on pages 17 and 110 that management reviews the Operational Quality Assurance Program "at least every two years." It is the staff position that this should be done annually. Please revise the Operational Quality Assurance Plan to reflect this staff position or provide justification for the deviations.
3)	Section (II)	Describe measures for communicating to all responsible organizations and individuals that quality policies, QA manuals, and procedures are mandatory requirements which must be implemented and enforced.
4)	Section (V)	Items F and G on page 78 discuss the evaluation of contractors from a quality standpoint by the Manager - Operational Quality Assurance. Please clarify that the evaluations are such that the Jersey Central Power & Light Company is assured that Appendix B to 10 CFR Part 50 will be implemented.
5)	Section (III)	Page 52 addresses training of personnel. Please provide a commitment that methods are provided for documenting the content of each training session, who attended, the time and date, and the results.
6)	Section (III)	Describe measures which assure that 1) quality-related activities are performed with specified equipment under suitable environmental conditions and 2) pre-requisites are satisfied before inspection and test.
7)	Section (III)	Page 52 states that Jersey Central Power & Light Company shall "utilize the guidance" of a number of Regulatory Guides and ANSI standards. Please make this a commitment to "meet the Regulatory Position" of the Regulatory Guides and "meet the requirements" of ANSI N45.2.12 which is not endorsed by a Regulatory Guide. In addition, we request you update your commitments in this area to the latest available NRC quality assurance guidance which is given in the following documents:

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Regulatory Guide 1.8	Rev. 1R	5/77
Regulatory Guide 1.28	Rev. 1	3/78
Regulatory Guide 1.30		8/72
Regulatory Guide 1.33	Rev. 2	2/78
Regulatory Guide 1.37		3/73
Regulatory Guide 1.38	Rev. 2	5/77
Regulatory Guide 1.39	Rev. 2	9/77
Regulatory Guide 1.58		8/73
Regulatory Guide 1.64	Rev. 2	6/76
Regulatory Guide 1.74		2/74
Regulatory Guide 1.88	Rev. 2	10/76
Regulatory Guide 1.94	Rev. 1	4/76
Regulatory Guide 1.116	Rev. 0-R	5/77
Regulatory Guide 1.123	Rev. 1	7/77

ANSI N45.2.12 (Draft 3, Rev. 4, 2/74)

We will evaluate "exceptions" (we suggest they be called "alternatives,") to these documents upon receipt of the updated information. Indicate the NRC guidance which will not be followed, and provide the alternative.

Since your position on Regulatory Guide 1.54 is given in response to question 11 in Supplement 6 to Amendment 68 to the Application for a Full Term License and since the NRC no longer reviews commitments to Regulatory Guide 1.54, reference to this Regulatory Guide can be deleted from the Operational Quality Assurance Plan.

8) Sections (IV, V, & XII)

Item AE on page 67 and item S on page 71 both use "should" in two places. Please change these "shoulds" so that a commitment is provided or justify not doing so. Similarly, address the two "mays" in item Y on page 82 and the two "mays" in item A on page 108 to indicate requirements or justify not doing so.

9) Section (III)

Describe provisions which assure that the NRC will be notified of changes to the Operational Quality Assurance Plan prior to implementation and in organizational elements within 30 days after announcement. (Note that minor editorial changes and personnel reassignments of a nonsubstantive nature do not require NRC notification.)

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10) Section (IV)

Describe measures which assure that 1) design documents identify inspection and test criteria and 2) design characteristics can be controlled, inspected, and tested.

11) Section (IV)

Item L on page 64 addresses the use of a designer's supervisor to independently verify a design. If permitted, this activity should be under the following controls:

> If in an exceptional circumstance the designer's immediate supervisor is the only technically qualified individual available, this review can be conducted by the supervisor provided that:
>
> a. The other provisions of Regulatory Guide 1.64 are satisfied,
>
> b. The justification is individually documented and approved in advance by the supervisor's management, and
>
> c. Audits by the quality assurance organization cover the frequency and effectiveness of this practice.
>
> The commitment to Regulatory Guide 1.64 should reflect this position or provide an alternative for the staff's evaluation. (See item 7.)

12) Section (IV)

Describe measures which assure that materials, parts, and equipment which are standard, commercial (off the shelf) or which have been previously approved for a different application are reviewed for suitability prior to selection.

13) Section (V)

Section V.1 needs to be clarified in the area of timeliness. Please show that procurement documents are reviewed and approved prior to release and that contractors' quality assurance programs are reviewed and concurred with, prior to initiation of activities affected by the program.

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14) Section (V)

On page 79, item I states that contractors must be evaluated at least once every five years to remain on the Contractor Classification List. Please provide a commitment to meet the staff position relative to the requirements of Section 3.4.2 of ANSI N45.2.12, Draft 3, Revision 4 (February 1974) which follows:

> In lieu of conducting annual audits of active suppliers (not including principal contractors) NRC will accept a commitment to the following alternative program as assurance that an acceptable external audit program has been established:
>
> > In lieu of routinely conducting an annual reaudit of each active supplier, a formal evaluation of the supplier is performed each year after the initial audit to determine if a reaudit is required during the upcoming year. This evaluation must be formal with the results documented and approved by responsible QA management, and it must consider pertinent factors such as the results of other audits, history of performance of product and/or service, and effectiveness of implementation of the supplier's QA program.
> >
> > This annual assessment shall consider the complexity of the component concerned and the degree of the quality and process control required by the supplier's effort. As a result of this evaluation, suppliers requiring a formal reaudit are identified. Regardless of the results of the evaluation, suppliers will be reaudited every three years.

15) Section (VIII)

Describe measures which assure that correct item identification is verified and documented prior to release for fabrication, assembling, shipping, and installation.

16) Section (VII)

Describe measures which assure that special processes are performed using written process sheets (or equivalent) with recorded evidence of verification.

17) Section (VI)

Please clarify item I on page 84 as to the prerequisites for an inspector to sign and date the authorization for work to proceed beyond a hold point.

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18) Section (VI)

Please clarify the last sentence in item J on page 84 to indicate that the "preestablished requirements" are the original design and inspection requirements or acceptable alternatives.

19) Section (VI)

Describe measures which assure that provisions are established for indirect control by monitoring processing methods, equipment, and personnel if direct inspection is not possible.

20) (App. B)

Item VI B on page 126 indicates that the Manager-Operational Quality Assurance concurs with maintenance, modification, replacement, and repair procedures "on a sampling basis." Please identify what personnel, knowledgeable in QA, reviews all of these procedures to determine the need for: a) inspection, b) identification of inspection personnel, and c) documenting inspection results. This review should not be made on a sampling basis.

21) Section (VI)

Please provide Jersey Central Power & Light Company's position on the attached "QA Branch Interpretation on Calibration Accuracy Requirements."

22) Section (IX)

Describe measures wh assure that qualified individuals accomplish the special handling, preservation, storage, cleaning, packaging, and shipping activities described in Section IX of the Operational Quality Assurance Plan.

23) Section (XI)

Please identify the individuals or groups having responsibility and authority for disposition and approval of nonconforming items. For each means of nonconformance control noted in part D of Section XI, describe measures which assure that documentation: 1) identifies the nonconforming item, 2) describes the nonconformance, 3) details the disposition of the nonconformance, 4) describes the inspection requirements, and 5) includes signature approval of the disposition.

24) Section (XI)

The last sentence in part N of Section XI indicates that nonconformance dispositioned "use as is" or "reject" require formal documentation in accordance with appropriate procedures. This appears to be too limiting in that all nonconformances should be properly documented in accordance with appropriate procedures. Please clarify. Also, for offsite work, describe measures which assure that nonconformance reports

dispositioned "accept as is" or "repair" are made part of the inspection records, forwarded with the hardware, and reviewed by Jersey Central Power & Light Company.

25) Section (XI) — Describe measures which assure that conditions adverse to quality (such as nonconformances, failures, malfunctions, deficiencies, deviations, and defective material and equipment) are evaluated to determine the need for corrective action to preclude repetition.

26) Section (X) — Describe measures which assure that sufficient records are maintained to provide documentary evidence of the quality of items and of the activities affecting quality.

27) Section (XII) — Part B of Section XII states that external audits are controlled by the procurement control section of the Operational Quality Assurance Plan. This implies that the commitments of Section XII of the plan do not apply to external audits. Please clarify.

28) Section (XII) — Describe measures which assure that audits are regularly scheduled on the basis of the status and safety importance of the activities being performed, that audits are performed in the areas where the requirements of Appendix B to 10 CFR Part 50 are being implemented, and that audits include the safety-related activities associated with:

a. Operation, maintenance and modification.

b. The preparation, review, approval, and control of designs, specifications, procurement documents, instructions, procedures, and drawings.

c. Receiving and plant inspections.

d. Indoctrination and training programs.

e. The implementation of operating and test procedures.

f. Calibration of measuring and testing equipment.

29) Section (XII) — Describe measures which assure that audit data are analyzed and the results, which indicate quality trends and the effectiveness of the QA program, are reported to management for review and assessment.

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30) Section (IV)

Describe measures which assure that plant modifications are reviewed by qualified personnel to assure inclusion of appropriate fire protection requirements. These reviews should include items such as:

a. Verifying adequacy of wiring isolation and cable separation criteria.

b. Verifying appropriate requirements for room isolation (sealing penetrations, floors, and other fire barriers).

31) Section (X)

Describe measures which assure that instructions and procedures for design, installation, inspection, test, maintenance, modification, and administrative controls are reviewed to assure the proper inclusion of fire protection requirements such as precautions, control of ignition sources and combustibles, provisions for backup fire protection if the activity requires disabling a fire protection system, and restriction on material substitution unless specifically permitted by design and confirmed by design review.

32) Section (VI)

Describe measures which assure that penetration seals are installed and fire retardent coatings are applied by trained personnel using approved procedures.

33) Section (VI)

Describe measures which assure that QA/QC verifies testing of fire protection systems and verifies that test personnel are effectively trained.

34) Section (IV)

Part 6 of Regulatory Guide 1.143 of July, 1978, concerns independent verification of design and procurement documents. Item L on page 64 of the Operational Quality Assurance Plan indicates that an independent design review or design verification is not required for the Quality Group D Augmented portion of the plan. Please make this item applicable to Group D or justify not doing so.

35)

The QA program requirements of 10 CFR Part 71, "Packaging of Radioactive Material for Transport and Transportation of Radioactive Material Under Certain Conditions," applies to each person authorized by the Commission to receive, possess, use or transfer licensed materials if he delivers such materials in accordance with 10 CFR §71.12 to a carrier for transport or transports such materials outside the confines of his plant or other place of use.

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Pursuant to 10 CFR §71.51 the licensee must establish, maintain and execute a QA program for its shipping activities. This QA program applies to the design, fabrication, assembly, testing, use (preparation of packages for shipment) and maintenance, and is to satisfy each of the applicable criteria specified in Appendix E, "QA Criteria for Shipping Packages of Radioactive Material," to Part 71. Since Appendix E of Part 71 is substantively the same as Appendix B to Part 50, Paragraph 71.51(d) allows use of a Commission approved QA program based upon applicable criteria of 10 CFR Part 50 Appendix B with regard to transport packages.

Although the regulations provide for acceptability of the Part 50 QA program, an application must be filed with the Transportation Branch, NMSS, committing the applicant to apply the previously approved Appendix B QA program to the applicable transportation activities of the licensee.

With regard to activities related to packaging and transport of radioactive materials at the Generation Division of JCP&L, as described in your operational QA plan, control of the radioactive material is not effectively transferred to another licensee (the packages are loaded by JCP&L under their facility licenses). Thus, delivering the material to a carrier for transport remains the responsibility of JCP&L. JCP&L then must conduct their activities in accordance with Part 71. The proposed limitations as described by JCP&L for their transportation activities (last paragraph p. 4, Rev. 2) in the QA plan eliminate most, if not all, of the eighteen criteria of Appendix B of 10 CFR Part 50 or Appendix E of 10 CFR Part 71 and are thus not acceptable.

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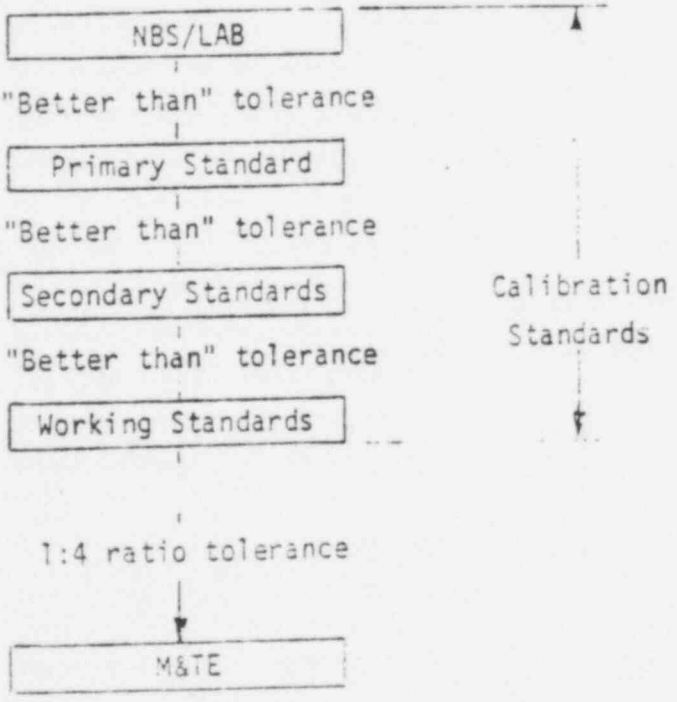
QA BRANCH INTERPRETATION ON CALIBRATION ACCURACY REQUIREMENTS

Calibration standards shall have an accuracy, range, and stability which are adequate to verify that the equipment being calibrated is within the required tolerance. The tolerance of calibration standards shall be better than the tolerance of lower level calibration standards being calibrated.

Measuring and test equipment (M&TE) used for measuring, gauging, testing, inspection or control to determine compliance with design, specifications, or other technical requirements shall be calibrated against standards having tolerances not greater than one-fourth the required tolerance of the M&TE being calibrated.

M&TE which is used both for calibration and measuring or test shall follow the one-fourth tolerance requirement.

In situations where it is impractical to comply with the above calibration equipment of a lesser accuracy is allowed providing the justification and basis are documented and authorized by responsible management and the equipment being calibrated can be shown to be within the tolerance and adequate for the requirements of the equipment being calibrated. The following calibration diagram is provided for illustration:



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