

Docket No. 50-289

FEB 4 1974

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Metropolitan Edison Company
 ATTN: Mr. John G. Miller
 Vice President
 P. O. Box 542
 Reading, Pennsylvania 19603

Gentlemen:

On January 21, 1974 you submitted by letter copies of your proposed Operating Quality Assurance Plan for Three Mile Island Nuclear Station, Unit 1. We had the opportunity to review a previous draft of this plan and have now completed our review of this later revision. Your proposed Operating Quality Assurance Plan is acceptable provided that you incorporate the changes defined in the enclosure to this letter and file the revised Plan as an amendment to your application by March 1, 1974.

In addition to having the Plan on file, you will be required to implement your Operating Quality Assurance Program before an operating license is issued for Three Mile Island Unit 1.

Sincerely,

Original Signed by
 Albert Schwencer

A. Schwencer, Chief
 Light Water Reactors Br. No. 2-3
 Directorate of Licensing

Enclosure:

Changes re Operating Quality
 Assurance Plan

cc: Mr. George F. Trowbridge, Esquire
 Shaw, Pittman, Potts & Trowbridge
 910 17th Street, NW
 Washington, D. C. 20006

OFFICE →	LWR 2-3	L:C/LWR 2-3					
SURNAME →	RMB RMBernero:kmf	ASchwencer	RVollmer				
DATE →	1/30/74	2/1/74	1/31/74				

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Three Mile Island Unit 1 Operational Quality Assurance

1. The Metropolitan Edison Company (MetEd) states in its QA Program description "on an individual case basis, the Manager-Generation can arrange with other organizations, such as GPU Service Corporation, for assistance in support of the Metropolitan Edison Company Quality Assurance Program; in such cases, he is responsible for assuring that these organizations have suitable Quality Assurance Programs for the work they perform, as further discussed in Section VII". Section VII of MetEd's program describes vendor selection, vendor surveillance, receipt inspection, and receiving test inspection activities.

MetEd has not identified a position within its organization with the assigned responsibility for the review of and concurrence with QA Program(s) developed and/or implemented for them by other organizations, including GPU Service Corporation (GPUSC). Neither has MetEd stated that periodic audits will be conducted of the implementation of the QA program activities delegated to GPUSC and other major organizations/contractors.

Criterion 1 of Appendix B to 10 CFR 50 states, "The applicant may delegate to other organizations the work of establishing and executing the Quality Assurance Program, or any part thereof, but shall retain responsibility therefore".

It is our position that to retain responsibility for delegated portions of the QA Program, MetEd must:

- (a) Identify a position within its organization, filled by a qualified individual, to review and concur with the QA Program(s) of those organizations, including GPUSC, delegated QA Program responsibilities by MetEd.
 - (b) Periodically audit the implementation of the delegated portions of the QA Program being performed by other organizations, including GPUSC.
2. MetEd has not committed to the guidance presented in the "Guidance on Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants", dated October 26, 1973 (Orange Book). It is our position that MetEd must:
 - (a) Commit to the implementation of the guidance contained in the "Orange Book", or
 - (b) Identify any exceptions and describe acceptable alternates.

POUR ORIGINAL