

ATTACHMENT

Section I - Operational Quality Assurance Plan Revisions

1. Incorporate a reorganization of the Oyster Creek Nuclear Generating Station Plant staff, the Generation Construction and Maintenance Department Organization, and the Material Division. This reorganization represents major changes throughout the QA Plan and constitutes the major revision of the Plan. To best understand the reorganization, refer to Section II-Organization, Page 16 of the Operational Quality Assurance Plan revision.
2. Incorporate a revision in the project interface documents between General Public Utilities Corporation and Jersey Central Power & Light Company. Refer to Pages 37 and 38.
3. Incorporate a change in JCP&L's commitment to Reg. Guide #1.88 and ANSI N45.29 to be consistent with progress made since June 30, 1978, and our discussions with Region I Inspection and Enforcement personnel after their February 9, 1979, QA inspection at Oyster Creek. Refer to Page 59.
4. Incorporate a requirement that inspection and test requirements be part of design consideration, and that test documents include inspection and test criteria and methods which assure the design characteristics can be controlled, inspected, and tested as appropriate. This revision has been incorporated as a result of your "Request For Additional Information And Staff Positions On The Operational Quality Assurance Plan For Oyster Creek Nuclear Generating Station", dated 8/14/79. Refer to Items I and J on Page 65.
5. Incorporate a change in the requirement for independent design reviews which are accomplished by a person's supervisor to be consistent with the current NRC position. This was incorporated as a result of your "Request For Additional Information And Staff Positions On The Operational Quality Assurance Plan For The Oyster Creek Nuclear Generating Station", dated 8/14/79. Refer to Item L on Page 65.
6. Incorporate a change in the requirement for utilizing distributors and sales offices when procuring materials, parts, and components. Refer to Item J on Page 80.
7. Incorporate a change in the wording of how Operational Quality Assurance notifies a contractor that its product does not comply with purchase order requirements. Refer to Item N on Page 82.

8. Incorporate a change in the responsibility for performing inspections of materials subject to degradation such as fire stops, seals, and fire retardant coatings from the Manager-Safety and Security to the General Public Utilities Fire Prevention Task Force. Refer to Items P and R on Page 88.
9. Incorporate a change in the wording of Item I on Page 93.
10. Incorporate a clarification to Appendix C. Refer to Items Q and R on Page 103.
11. Incorporate a revision to require that nonconformance and corrective action review, approval, and concurrence be in accordance with Appendix B of this Plan. Refer to Item J on Page 108.
12. Incorporate a revision in the requirement for performing security audits once every two years. This revision is to make the QA Plan consistent with the Operating Technical Specification requirements. Refer to Item A on Page 111.
13. Incorporate a revision to the QA System List, Part I, to remove the fire protection system, to include those portions of non-nuclear safety related systems which must be seismically designed to protect nuclear safety related systems, and to include the fire main and diesel pumps into the QASL Part I listing. Refer to Page 116.
14. Incorporate a clarification as to what "preparation responsibility", "concurrence responsibility", and "approval of responsibility" means when utilized in Appendix B. Refer to Page 124.
15. Delete the requirement that Site QA concur with job orders in order to be consistent with our practice. Refer to Appendix B Page 126.
16. Incorporate the comment: "in the case of nuclear fuels and fuel related work, Manager-Generation Stations/Nuclear fulfills the responsibilities of the Manager-Generation Engineering". Refer to Page 127.
17. Several paragraphs letter changes have been made to accommodate new paragraphs.

Section II - Comments and Clarifications - With regard to your "Request For Additional Information And Staff Positions On The Operational Quality Assurance Plan For The Oyster Creek Nuclear Generating Station", dated 8/14/79, the following comments and clarifications are provided:

1. With regard to your Item #2, JCP&L relies upon its audit program to establish compliance with the QA program requirements. This audit program is very extensive and complies with the requirements of the Operational Quality Assurance Plan. The purpose of the management review is to provide upper management with an evaluation of the effectiveness of the QA program. JCP&L has taken this requirement very seriously and has utilized outside consulting services in the past to perform this management review. These management consultants have been asked to look at the program from a management sense and to provide observations and recommendations which would help upper management to make the QA program more effective and efficient. The most recent management review was performed by means of personnel interviews where the consulting organization interviewed a large cross section of JCP&L personnel from top management down into the bargaining unit. It was very extensive and quite comprehensive. Observations and recommendations are very broad, programmatic and organizational type recommendations which require the attention of the highest levels of management. JCP&L feels that this type of management review is important, and as a result, has structured its management review commitment in the Operational Quality Assurance Plan to fulfill this need. JCP&L feels that a two year cycle is adequate for such an extensive management review. In addition to this commitment to do a management review of the QA Program effectiveness, Item Number 17 on Page 30 of the Quality Assurance Plan, Revision 3, states that the Manager-Operational Quality Assurance is responsible for "Appraising the Vice President-Generation of the effectiveness and adequacy of this program". This requirement is implemented on a continuing basis and supplements the two year management review. For these reasons, JCP&L feels that the two year cycle is justified.
2. With regard to your Item #3, please refer to the President's Policy Statement, at the beginning of the Operational Quality Assurance Plan. JCP&L feels that the policy statement adequately addresses your request.
3. With regard to your Item #25, this subject is addressed in Section XI.H on Page 108.

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4. With regard to your Item #26, this concern is addressed in JCP&L's commitment to ANSI N45.2.9, Page 58.
5. With regard to your Item #27, please refer to Page 51, first paragraph for clarification.
6. With regard to your Item #28, please refer to Page 111, Items A, C, D, F, and G. These items address the scheduling of audits. Item A also requires that each element of the Operational Quality Assurance Program be audited at least once every two years. These elements include, among other things: maintenance and modification, Section IV of the QA Plan; preparation review, approval, and control design specifications, Section IV of the QA Plan; the preparation, review, approval, and control of procurement documents, Section V of the QA plan; instructions, procedures, and drawings, in various sections of the QA Plan; receiving inspection, Section V of the QA Plan; plant inspection, Section VI of the QA Plan; indoctrination and training programs, Section III of the QA Plan; the implementation of test procedures, Section VI of the QA Plan; and calibration of measuring and test equipment, Section VI.f of the QA Plan. The other areas you mentioned operation and indoctrination and training programs are audited in accordance with our commitments in Chapter 6 of the Operating Technical Specifications. See Section XII.N of the QA Plan, Page 113.

In conclusion, all of those areas which you have mentioned and other Operational Quality Assurance Plan areas which you have not mentioned, are audited on a planned and periodic basis in accordance with the requirements of Section XII of the QA Plan.

7. With regard to your Item #29, please refer to Section XII.D, Page 111 of the QA Plan for clarification.
8. With regard to your comment #35, JCP&L submitted a letter to the Director Office of Nuclear Material Safety and Safeguards on October 23, 1979. This letter was submitted as a result of a meeting we had with that organization on September 6, 1979, and should satisfy that comment.

JERSEY CENTRAL POWER & LIGHT COMPANY  
OYSTER CREEK NUCLEAR GENERATING STATION

PROVISIONAL OPERATING  
LICENSE NO. DPR-16

Revision 4 to  
Amendment Number 71 to the  
Application for a Full Term License

Docket No. 50-219

Applicant submits, by this Revision 4 to Amendment Number 71 to the Application for a Full Term License for Oyster Creek Nuclear Generating Station changes Amendment Number 71.

JERSEY CENTRAL POWER & LIGHT COMPANY

BY:

*Steven R. Finkbeiner*  
Vice President

STATE OF NEW JERSEY  
COUNTY OF MORRIS

Sworn and subscribed to before me this 17<sup>th</sup> day of April, 1980.

*Phyllis A. Kabis*  
Notary Public

PHYLLIS A. KABIS  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires Aug. 16, 1984



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

JERSEY CENTRAL POWER & LIGHT COMPANY

}  
Docket Number 50-219  
}

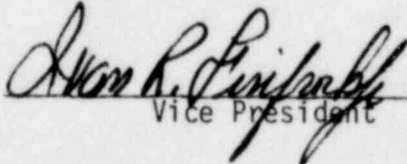
CERTIFICATE OF SERVICE

This is to certify that a copy of Revision 4 to Amendment Number 71 to the Application for a Full Term License for the Oyster Creek Nuclear Generating Station, filed with the U. S. Nuclear Regulatory Commission on April 17, 1980, has this 17 day of April 1980, been served on the Mayor of Lacey Township, Ocean County, New Jersey by deposit in the United States mail addressed as follows:

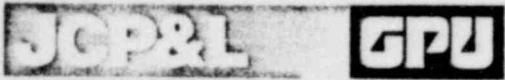
The Honorable Henry Von Spreckelsen  
Mayor of Lacey Township  
P. O. Box 475  
Forked River, New Jersey 08731

JERSEY CENTRAL POWER & LIGHT COMPANY

BY:

  
Vice President

DATED: April 17, 1980



Jersey Central Power & Light Company  
Madison Avenue at Punch Bowl Road  
Morristown, New Jersey 07960  
(201) 455-8200

April 17, 1980

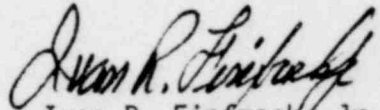
The Honorable Henry Von Spreckelsen  
Mayor of Lacey Township  
P.O. Box 475  
Forked River, New Jersey 08731

Dear Mayor Von Spreckelsen:

Enclosed herewith is one copy of Revision 4 to Amendment Number 71 to the Application for a Full Term License for the Oyster Creek Nuclear Generating Station.

This document was filed with the U. S. Nuclear Regulatory Commission on April 17, 1980.

Very truly yours,

  
Ivan R. Finrock, Jr.  
Vice President

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Enclosures