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April 24, 1981
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TMI Program Office
Attn: Dr. B. J. Snyder
Program Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
TMI Unit 2, Recovery Quality Assurance Plan

This letter is written in response to your letter dated March 20, 1981, which specified some outstanding items on the TMI Unit 2 Recovery QA Plan. Our positions on the two Regulatory Guides noted in your letter are as follows:

- A. Regulatory Guide 1.58: Appendix C of the TMI-2 Recovery QA Plan will be revised to indicate compliance with Regulatory Guide 1.58, Revision 1, July, 1979, "Qualifications of Nuclear Power Plant Inspection, Examination and Testing Personnel" which endorses ANSI N45.2.6-1978.
- B. Regulatory Guide 1.146: An addition will be made to Appendix C of the TMI-2 Recovery QA Plan specifying commitment to the regulatory position as stated in Regulatory Guide 1.146 August, 1980 "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants" and ANSI N45.2.23.

In addition, the following clarification will be stated for Regulatory Guide 1.58:

- 1. The guidance of Regulatory Guide 1.58 shall be followed as it pertains to the qualifications of personnel who verify conformance of work activities to quality requirements. The qualifications of plant operating personnel concerned with day-to-day operation, maintenance, and certain technical services shall conform to Regulatory Guide 1.8.
- 2. Not all personnel who:

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- a. Review and approve inspection and testing procedures,

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- b. Evaluate the adequacy of activities to accomplish the inspection and test objectives,
- c. Evaluate the adequacy of specific programs used to train and test inspection and test personnel,
- d. Certify Level III individuals in specific categories or classes,

will be certified as meeting the Level III capability requirements of ANSI N45.2.6-1978.

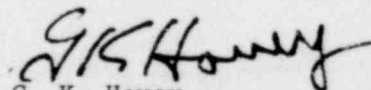
Rather these personnel will be determined by management through evaluation of their education, experience, and training to be fully qualified and competent to perform these functions. The basis for the determination will be documented.

Level III inspectors will be utilized in full compliance with Reg. Guide 1.58. Additional review and approval may be performed by supervisory personnel determined by management to be fully qualified and competent as specified in clarification 2 above. Statements in Appendix C regarding R.G. 1.58 are intended to clarify this position.

The above positions as stated, are being implemented and will be included in the next revision to the Recovery QA Plan. The revision will be issued before February 28, 1982.

Your letter also requested that we provide a complete listing of system, structures, and components to which the TMI-2 Recovery QA Plan applies within 90 days of the receipt of your letter. This list is currently being developed and should be available in the time period you stated.

Sincerely,



G. K. Hovey
Vice-President and
Director, TMI-2

GKH:MJS:JJB:djb

cc: L. H. Barrett, Deputy Program Director