ONCOLOGY SERVICES CORPORATION

110 Regent Court • Suite 100 • State College, PA • 16801 814-238-0375 • 800-628-9076 • Fax: 814-238-8069

030-31765

February 5, 1993

Overnight UPS

U.S. Nuclear Regulatory Commission
Richard W. Cooper, II, Director
Division of Radiation Safety
and Safeguards, Region I
475 Allendale Road
King of Prussia, PA 19406

RE: License 37-28540-01

Dear Mr. Cooper:

Per our meeting of January 27, 1993, Oncology Services Corporation requests an amendment to NRC License No. 37-28540-01 to change the Radiation Safety Officer from David E. Cunningham, Ph.D. to Bernard Rogers, M.D. Dr. Rogers' credentials, which were presented at the meeting, are included for completeness. Dr. Rogers is familiar with the terms and conditions of the license and the applicable regulations. Moreover, Dr. Rogers has been an authorized user on various NRC licenses for brachytherapy since 1976.

Oncology Services Corporation seeks to operate HDR treatment under the license at two centers: The Greater Harrisburg Cancer Center and the Greater Pittsburgh Cancer Center.

OSC has also retained Robert Gallaghar, CHP as a Regulatory Issues Consultant. Enclosed are copies of Mr. Gallaghar's resume and a summary of his Part 35 regulatory compliance experience.

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"SECTION COPY"

FEB 0 8 1993

As RSO, Dr. Rogers would visit both the Pittsburgh and Harrisburg facilities once per week for the next ten weeks. At that point his on-site commmitment would be re-evaluated. As a Regulatory Issues Consultant, Mr. Gallaghar will visit both the Pittsburgh and Harrisburg facilities once per week for the next five weeks and once per month thereafter.

The amendment fee of $460.00 is enclosed.

Thank you for your continued cooperation and assistance in this matter.

Respectfully,

Douglas R. Colkitt, M.D.

DRC:amh
Enclosures

cc: B. Rogers, M.D.
D. Cunningham, Ph.D.
R. Gallaghar
K. Kearney, Esquire(w/encl.)

Curriculum Vitae

Robert G. Gallaghar
17 Park Avenue
East Greenbush, NY 12061

OFFICES: Pittsburgh, PA (412) 835-9555
Washington, DC (301) 469-8087
Albany, NY (518) 477-7974

SUMMARY OF QUALIFICATIONS AND EXPERIENCE

R.G. Gallaghar combines more than 40 years of professional health physics work with about 30 years of top management experience. He has been an officer and a director of 6 corporations, a hospital, several technical societies, trade associations, a chamber of commerce and founded a library on atomic energy. A large part of his professional work has been devoted to medical aspects of radiological safety and loss prevention. The National Institutes of Occupational Health (NIOSH) contracted to have him prepare 7 volumes summarizing the first nationwide occupational health and safety study of about 6,000 hospitals over a 10 year period.

In addition to his contract with NIOSH, he has provided contract studies for OSHA, US-EPA, NRC , and NY State Environmental Conservation. He has managed comprehensive loss prevention and compliance audits for 3 insurance companies involving several hundred hospitals in the U.S.. In 1992, he completed audits of Amersham, Medi & Physics and Babcock-Wilcox's commercial nuclear operations.

Bob is currently certified by the following professional boards:

* American Board of Health Physics - Certified Health Physicist (CHP) to 1995 - (Comprehensive Practice)
* American Board of Industrial Hygiene - Certified Industrial Hygienist (CIH) to 1994
* Board of Safety Professionals: Certified Safety Professional (CSP) to 1994
* International Hazard Control Management Certification Board -Certified Hazard Control Manager (CHCM) to 12/93
* Commonwealth of Massachusetts - Registered Professional Engineer (PE) to 7/94

He has been named as Radiation Safety Officer, on 6 NRC or State licenses for medical, industrial, research and federal agency use of byproduct, source and special nuclear materials. His qualifications and experience as RSO relative to 10CFR Part 35 Medical Use of Byproduct Material are attached along with description of his education and professional association, and employment. Further details and names of references are available upon request.

Feb 1992

Qualifications and Experience of Robert G. Gallaghar Re. 10CFR Part 35 Medical Use of Byproduct aterial, Subpart: "Training and Experience"

35.900 Radiation Safety Officer...certified by

(a) (1) American Board of Health Physics in Comprehensive Health Physics. R.G. Gallaghar has been recertified through 1995. (He is also certified by 3 other professional boards that ve recertified him through 1994 or 1995)

(b) Has had classroom and laboratory training and experience as follows:
(1) 200 hours of classroom and laboratory training that includes.

(I) Radiation physics and instrumentation.
(II) Radiation protection.
(III) Mathematics pertaining to the use and measurement of radioactivity;
(IV) Radiation biology;
(V) Radiopharmaceutical chemistry;

NOTE: In addition R.G. Gallaghar has taught the 5 topics listed above to graduate and post graduate students including MD, Ph.D and ScD at the following:

- Harvard University, Graduate School of Public Health 1956-60 (under Dr. P. Drinker & Dr. Leslie Silverman)
- University of Pittsburgh, Graduate School of Public Health, Dept. of Occupational Health as Assistant Adjunct Professor under Neil Wald, MD
- Guest lectureships at University N. Carolina, GSPH Massachusetts Institute of Technology and the University of California (Berkeley) and the University of Cincinnati, College of Medicine

(2) One year of full time experience as a radiation safety technologist at a medical institution under the supervision of the individual identified as the Radiation Safety Officer on a Commission or Agreement State License that authorizes the medical use of byproduct material;

Robert G. Gallaghar served over 2 years under Dr. Charles Robinson, RSO, Tufts University, Medical, Dental College, Boston, MA

Medical Health Physics Professional Experience - R. G. Gallaghar, CHP
U.S. Public Health Service; Bureau of Radiological Health
Washington, DC (1949-1950) Cincinnati, OH (1950-1954)

Radiological Health Training Section: Preparation, organization, presentation to USPHS, Coast Guard, Marine Hospital Staff, State and local public health officials. Assisted in preparation
With regard to 10 CFR 35 Subpart J 35.900 (2)(c), Robert G. Gallaghar has been identified as Radiation Safety Officer in the following licenses:

Albany Associates in Cardiology, NY D. H license
Applied Health Physics, Inc. 3 NRC Licenses
Capital Materials Testing - NY Dept. of Labor
Nuclear Science & Engineering Corp., NRC
Liberty Mutual Insurance Co, NRC/AEC

Medical Health Physics Professional Experience - R. G. Gallaghar, CHP

U.S. Public Health Service; Bureau of Radiological Health, Washington, DC (1949-1950) Cincinnati, OH (1950-1954)

Radiological Health Training Section. Preparation, organization, presentation to USPHS, Coast Guard, Marine Hospital Staff, State and local public health officials. Assisted in preparation - Radiological Health Handbook.

Occupational Health Branch, Bureau of State Services
Managed film badge service to U.S. Government hospitals, embassies, federal prisons and PHS staff occupationally exposed to radiation. Performed health physics surveys at USPHS hospitals (Cleveland, San Francisco, San Diego, Baltimore, Marthas Vineyard). Lead PHS campaigns to eliminate the use of radium in brachytherapy in U.S. hospitals, especially government owned. Presented talks to medical associations, hospital staffs and wrote several articles on hazards of medical use of radium. Developed and published a widely used method to test for leaking medical radium applicators (referenced in NCRP Report No. 40 "Protection Against Radiation from Brachytherapy Sources"). Performed occupational and environmental surveys for Baltimore City Health Department of Kelly Clinic. Provided medical, health physics services to Cincinnati and Ohio State Officials following the famous radium accident involving 287 people-directed decontaminations of affected persons and assisted. Eugene L. Saenyer MD in medical evaluation. Later worked with Dr. Saenger at Cincinnati General Hospital, Childrens Hospital and at his medical office. Served at Jewish Hospital under Sol. Tapletts, MD in surgery on therapeutic administration of gold-198 for cancer treatment. Provided professional help on deliberate ingestion of radium chloride by a young women. Worked at several Cincinnati hospitals doing routine health physics work on diagnostic and therapeutic uses of X-ray Dr. Saenger and I have published numerous articles such as the text Medical Aspects of Radiation Accidents, US-AEC; "Radium Capsules and their Associated Hazards" R.G. Gallaghar, E.L. Saenger. Am. J. Roentgen, Radiation Therapy & Nuclear Medicine Vol 77 No. 3, March, 1957.

Liberty Mutual Insurance Company, Boston, MA (1954-1960)

Provided health physics support services to insured hospitals, clinics and medical specialists in US and Canada. Performed health physics surveys about 100 medical facilities including management of radium accidents evaluation and control at :

Touro Infirmary, New Orleans, LA
Sister of Mercy Hospital, San Diego, CA
Lynn Hospital, Lynn, MA
Johnstown Memorial Hospital, Johnstown, NY

Named in LMIC's Byproduct Materials license as user and as Radiation Safety Officer.

While working at LMIC Research Center in Hopkinton, MA, I designed, and subsequently manufactured and sold the following equipment for use in brachytherapy.

Periscopic shield 2" Pb thick sides, light, 2 mirrors to give optically correct viewing of brachytherapy applicators and identify radioactive capsules.

Shield/Sterilizer, rotating for storage of individual capsules with central chamber for safe storage of loaded Ernst or other applicator, equipped with locking mechanism.

Nuclear Science - Engineering Corp., Pittsburgh, PA (1960-1662)
Assistant Manger and Radiation Safety Officer named on NRC license which included preparation and distribution of radiopharmaceuticals. RGG managed bioassay laboratory services as well as other health physics, environmental and instrument services for government agencies, medical and industrial clients.

Applied Health Physics Inc., President and RSO.
Providing a broad spectrum of health physics services to the following medical facilities:

Abbott Hospitals, Inc.	Vega Alta	PR 00762
Aliquippa Hospital	Aliquippa	PA 15001
Allegheny General Hospital	Pittsburgh	PA 15212
Allegheny Valley Hospital	Natrona Heights	PA 15065
American Oncologic Hosp.	Philadelphia	PA 19111
Armstrong Memorial Hospital	Kittanning	PA 16201
Beth Israel Hospital	Passaic	NJ 07055
Braddock General Hospital	Braddock	PA 15104
Brookville Hospital	Brookville	PA 15825
Brownsville General Hospital	Brownsville	PA 15417
Bryn Mawr Hospital	Bryn Mawr	PA 19010
Canonsburg General Hospital	Canonsburg	PA 15317
Central Medical Center	New Kensington	PA 15068
City Hospital	Bellaire	OH 43906
Clinton Memorial Hospital	Wilmington	OH 45177
Conemaugh Valley Memorial Hosp	Johnstown	PA 15905-4398
Deaconess Hospital	Cincinnati	OH 45219
Detroit Osteopathic Hosp.Corp.	Southfield	MI 48086-5153
Divine Providence Hospital	Pittsburgh	PA 15212
Doctors Hospital	Columbus	OH 43201
Dubois Regional Medical Center	Dubois	PA 15801-0447
Ellwood City Hospital	Ellwood City	PA 16117-1399
Forbes Regional Health Center	Monroeville	PA 15146
Franklin Regional Medical Ctr.	Franklin	PA 16323
Greenville Regional Hospital	Greenville	PA 16125
Highlands Regional Medical Ctr	Prestonburg	KY 41653
Hinsdale Hospital	Hinsdale	IL 60521
Jameson Memorial Hospital	New Castle	PA 16105-2595
Jeannette Dist. Memorial Hosp.	Jeannette	PA 15644
Latrobe Area Hospital	Latrobe	PA 15650
Lee Hospital	Johnstown	PA 15901
McCullough-Hyde Memorial Hosp.	Oxford	OH 45056
Meadville Medical Center	Meadville	PA 16335
Mercy Hospital	Pittsburgh	PA 15219
Mercy Hospital Fairfield	Fairfield	OH 45014
Mercy Hospital Of Johnstown	Johnstown	PA 15905
Mercy Hospital Of Ohio	Hamilton	OH 45012
Middletown Regional Hospital	Middletown	OH 45044-4898
Monongahela Valley Hospital	Monongahela	PA 15063
Monsour Medical Center	Jeannette	PA 15644
North Hills Passavant Hospital	Pittsburgh	PA 15237
Northwest Medical Center	Franklin	PA 16323
Northwest Medical Center	Oil City	PA 16301
Ohio Valley Hospital	Steubenville	OH 43952
Oswego Hospital	Oswego	NY 13126
Phillipsburg State Gen. Hosp.	Phillipsburg	PA D
Preston Memorial Hospital	Kingwood	WV 26537
Punxsutawney Area Hospital	Punxsutawney	PA 15767
Robert Packer Hospital	Sayre	PA 18840
Ryder Memorial Hospital	Humacao	PR 00661
San Juan City Hospital	Condado	PR 00907
Sewickley Valley Hospital	Sewickley	PA 15143
Shadyside Hospital	Pittsburgh	PA 15232
Shenango Valley Medical Center	Farrell	PA 16121
St. Clair Hospital	Pittsburgh	PA 15243
St. Francis General Hospital	Pittsburgh	PA 15201
St. Francis Medical Center	Pittsburgh	PA 15215
St. Johns Hospital	Cleveland	OH 44102
St. Margaret Memorial Hospital	Pittsburgh	PA 15215
St. Thomas Hospital	St. Thomas	US 00801

Suburban General Hospital	Bellevue	PA	15202
The Toledo Hospital	Toledo	OH	43606
Tioga General Hospital	Waverly	NY	14892
Titusville Hospital	Titusville	PA	16354
Uniontown Hospital	Uniontown	PA	15401
Univ. Of Pgh. Medical Center	Pittsburgh	PA	15203
University Hosp. of Cleveland	Cleveland	OH	44106
V. A. Medical Center	Cincinnati	OH	45220
V. A. Medical Center	Pittsburgh	PA	15206
Warren General Hospital	Warren	PA	16365
Washington Hospital	Washington	PA	15301
West Penn Hospital	Pittsburgh	PA	15224
Wilkes Barre General Hospital	Wilkes Barre	PA	18774

Curriculum Vitae

Bernard R. Rogers, M.D.

EDUCATION AND TRAINING

B.S. 1966	North Carolina Central University Durham, North Carolina Chemistry
M.D. 1971	Meharry Medical College Nashville, Tennessee
Internship 7/71-6/72	Youngstown Hospital Association Youngstown, Ohio
Residency 7/72-6/73	Youngstown Hospital Association Youngstown, Ohio Pathology
Residency 7/73-6/76	University of Minnesota Hospitals Minneapolis, Minnesota Radiation Therapy

LICENSURE AND CERTIFICATION

Certification	Board Certified, American Board of Radiology and Radiation Oncology December, 1977
State Licenses	California, Georgia, Illinois, Maine, Minnesota, Pennsylvania, Tennessee

PROFESSIONAL EXPERIENCE

1991-Present	Clinical Director of Brachytherapy Oncology Services Corporation State College, PA
November 1990- February 1991	Visiting Fellow in Interstitial Brachytherapy and Hypertension Long Beach Memorial Hospital Long Beach, CA
1991	Visiting Fellow in High Dose Brachytherapy Evansville Cancer Center Evansville, Indiana

10/88-10/90	Kankakee Radiation Therapy Center, Medical Director Kankakee, Illinois
8/87-1988	Locum Tenens
6/86-7/87	Central Maine Medical Center Lewiston, Maine Associate, Radiation Oncology Private Practice
6/85-5/86	Locum Tenens
7/76-5/85	St. Cloud, Minnesota Radiation Oncology Private Practice

MEMBERSHIPS

American Society of Therapeutic Radiologists and Oncologists
American Endocurietherapy Society
North Central Cancer Treatment Group (NCCTG) of the Mayo Clinic 1978-1985

PUBLICATION:
ABSTRACT:

Radiation Therapy and BCNU North Central Cancer Treatment Group (Mayo Clinic 1986)

Curriculum Vitae

Robert G. Gallagher
17 Park Avenue
East Greenbush, New York 12061

OFFICES: Pittsburgh, PA (412)835-9550
Washington, DC (301)469-8087
Albany, NY (518)477-7974
1-800-DECON-IT

SUMMARY OF QUALIFICATIONS AND EXPERIENCE

R. G. ("Bob") Gallagher is regarded as an authority on occupational and environmental protection including emergency preparedness, damage control and a broad area of risk evaluation practices that focus upon loss prevention. He combines more than thirty years of top management experience and professional work in radiological safety (health physics), occupational and environmental protection. Bob has founded several corporations, technical associations and a library on atomic energy. He has been an officer and director of six companies, four hospitals, several technical societies, a trade association, a chamber of commerce and taught graduate courses at three universities.

More than 800 organizations in the United States, Canada and Europe have been clients of companies he has managed. These include Westinghouse, Du Pont, IBM, Eastman Kodak, Mayo Clinic, GE, AT&T, as well as federal and state agencies. He has been very successful as an expert witness. He lectures in the United States and Canada on emergency planning, control of radioactive contamination, hospital safety, medical malpractice prevention, decontamination, management and disposal of hazardous wastes. Currently, he concentrates on development and the use of independent audits coupled with the systems approach to loss prevention. His current lecture topics are:

- "Corporate Myopia"
- "Lessons Learned at Chernobyl"
- "Radioactivity in MY Backyard?!"
- "Radiation a Factor in YOUR Life"
- "Environmental, Social and Economic Risks Associated With Underground Storage Tanks"

Bob is a registered professional engineer(PE) and certified by four professional boards. He has dozens of articles and chapters published in technical journals. He has directed, edited and written many reports on special studies as part of contracts with National Institute of Occupational Safety & Health (NIOSH), U.S. Environmental Protection Agency (EPA), U.S. Nuclear Regulatory Commission (US-NRC), New York Dept. of Environmental Conservation and other federal and state agencies. He was a member of the U.S. delegation to USSR for nuclear decontamination and radiation waste management of Chernobyl. He has appeared on a number of radio and television programs and been interviewed by newspapers and magazines in the U.S., Canada, U.K. and USSR.

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EDUCATION:

Stanford University (4 years).....Biological Science(AB)
Western Maryland College (1 year).....Biology
Hahnemann Medical College (1 year).....Medicine
Oak Ridge Institute of Nuclear Studies &
Oak Ridge National Laboratory (1 year)....Health Physics
(National Research Council/U.S. Atomic Energy Commission Post Graduate Fellowship)
University of Cincinnati (1 year).....Liberal Arts

PROFESSIONAL CERTIFICATIONS AND HONORS:

CHP, Certified Health Physicist by the American Board of Health Physics
(Recertified 1989, #66-31)
CIH, Certified Industrial Hygienist by the American Board of Industrial Hygiene
(Recertified 9/92 to 12/31/92, #439)
CSP, Certified Safety Professional by Board of Certified Safety Professionals
PE, Registered Professional Engineer Massachusetts (1961 to Present), #15436
CHCM, Certified Hazard Control Manager by International Hazard Control
Management Certification Board
Sigma Xi (life member National Honorary Research Society)

PROFESSIONAL ACTIVITIES:

Air & Waste Management Association
American Academy of Health Physics
American Academy of Industrial Hygiene
American Association of Radon Scientists and Technologies (1989)
American Chemical Society (1949 - 1962)
American Industrial Hygiene Association
President: Pittsburgh Chapter
American Nuclear Society
American Public Health Association
American Society for Nondestructive Testing (1965 - 1970)
American Society of Safety Engineers
Cincinnati Radiation Society, Founder and Chairman (1950 - 1954)
The Engineering Society of Cincinnati (1951 - 1954)
Health Physics Society (Charter Member 1956 to Present)
Treasurer (2 Terms) - Board of Directors 3 years
President: Northeastern New York Chapter
Western Pennsylvania Chapter
Hospital Association of Western Pennsylvania
National Safety Council
National Safety Management Society
New York Academy of Science
New York Athletic Club
Assistant Professor, Graduate School of Public Health,
University of Pittsburgh, PA (1970)

MILITARY SERVICE:

U.S. Army, active duty: 1942 - 1945 (Infantry; Army Specialized Training Program)

U.S. Public Health Service, active duty: 1949 - 1954;
Promoted to Captain in 1979. (Inactive Reserve: 1954 to Present.)

EXPERIENCE:

DECONtamination International, Inc., Bethel Park, PA (1989 to Present)

Founder, Chairman and a major shareholder of this environmental remediation service company which does business as "DECON International, Inc." This company is the natural outgrowth of the clean-up and waste disposal work which Applied Health Physics, Inc. (AHP) has been doing since 1962. DECON International, Inc. (DECON) was formed to expand the use of decontamination and waste management techniques that Robert G. Gallagher ("RG") innovated in his graduate work at the Oak Ridge National Laboratory; perfected through research and development projects financed by the Bureau of Radiological Health of the U.S. Public Health Service, Liberty Mutual Insurance Company and Nuclear Science and Engineering Corporation. His decontamination skills have been utilized for 30 years by AHP to effectively manage over a hundred decontamination jobs that involved beryllium, arsenic, mercury, asbestos, etc., as well as, radioactive materials. However, "Health Physics" does not pertain to working with nonradioactive materials. Thus, to expand our commercial opportunities into the $400 billion dollar decontamination market, RG instituted a corporate reorganization designed to reduce conflict of interest within AHP and to provide greater professional growth for and profitability of AHP. The creation of DECON has enabled us to expand the commercialization of AHP's proven risk management skills to a very broad scope of environmental problems such as the decontamination of soil and water contamination caused by leaking underground storage tanks. As Chairman and 50% owner, "RG" insists that all corporate efforts adhere to the basic principles of the health physics profession, namely to audit, identify, control and to decontaminate environmental risks to levels that are as low as reasonably achievable (ALARA).

Applied Health Physics, Inc., Pittsburgh, PA, Albany, NY & Washington, DC (1962 to Present)

Chairman, President and founder of this professional radiological health and safety service firm. Directs marketing, business development and technical services which the firm furnishes to industrial and medical users of radiation as well as other hazardous materials. Designed and developed many of the safety services and specialized products and equipment offered by the company. Participates in the company's radiological safety training programs, radiation surveys and decontamination and waste disposal operations. Conducted comprehensive OSHA-type audits for the New York Department of Environmental Conservation Agency, and currently conducts training for hazardous waste compliance inspectors. Currently owns more than 50% of the outstanding stock in this 30 year old company.

Venture, Inc., Bethel Park, PA (1968 to Present)

President and Treasurer of Venture, Inc., a firm engaged in precious metal recovery and commercial real estate investments.

[illegible] Industries, Inc., Albany, NY (1979 to 1980)

Manager, Health, Safety and Security. Reorganized and directed occupational health, safety, environmental protection and security programs for manufacturing operations involving production of depleted uranium armor piercing projectiles, radiation shields and counter-weight for aircraft and missiles. Supervised health physics, medical, industrial hygiene, fire and plant protection personnel. Also managed licenses and permits for domestic manufacturing and export of source and by-product materials and waste disposal. Provided safety training and technical consultation services to employees and to customers.

Hospital Safety, Inc., Bethel Park, PA (1975 to 1979)

President and founder of this firm that provided a unique service to self-insured hospitals. HSI's objective was to prevent medical malpractice claims and to meet the hospital industry's need for experienced and effective means to reduce injuries, illnesses and absenteeism of hospital workers as well as to train hospital employees in proven loss prevention methods which would apply to their jobs in the hospital.

Nuclear Science & Engineering Corp., Pittsburgh, PA (1960 to 1962)

Assistant Manager, Director of the Health Physics Division. Supervised all of NSEC's health and safety activities. Responsible for the planning and direction of the health physics programs for approximately fifty industrial and governmental clients. Supervised such commercial services as bioassay, leak testing, decontamination, instrument repair and calibration. Managed environmental radioactivity monitoring programs at six nuclear power plants.

University of Pittsburgh, Pittsburgh, PA (1960 to 1970)

Originally appointed to the faculty of the Graduate School of Public Health as Adjunct Assistant Professor of Industrial Hygiene with special responsibility for the design and presentation of lectures, laboratory and field programs for the Department of Occupational Health. Later, joined the University's Dept. of Radiation Health as Adjunct Assistant Professor of Health Physics. Served in a part-time capacity to conduct field studies and supervise certain research projects by graduate students.

Liberty Mutual Insurance Co., Boston, MA (1954 to 1960)

Responsible for Health Physics Services. Assisted policyholders in solving a variety of radiological problems and worked with the insurance industry to evaluate many new uses of radiation and nuclear energy. Trained insurance engineers and industrial hygienists in the theory and techniques of performing radiological safety surveys. Served as a member of several technical committees of the Nuclear Energy Liability Insurance Association (NELIA) and helped develop inspection criteria for use in evaluating nuclear energy projects. Considerable experience was gained in damage control and decontamination work following radiation accidents. Placed in charge of the Radiation Laboratory and Calibration Facility at Liberty Mutual's Research Center in Hopkington, Massachusetts and conducted research on safety of encapsulated radioisotope sources and decontamination techniques.

Harvard University, Cambridge, MA (1956 to 1960)

Appointed Lecturer on Radiological Health at the Graduate School of Public Health. Liberty Mutual cooperated by permitting Mr. Gallagher to accept the appointment and to present lectures and laboratory sessions over a period of several years at Harvard. He also lectured at Massachusetts Institute of Technology (MIT), the Post Graduate Medical School of New York University (NYU), University of California (Berkeley) and University of North Carolina during this period of time.

U.S. Public Health Service, Washington, DC, Cincinnati, OH
Active Duty (1949 to 1954) Inactive Reserve (1954 to Present)

Received commission as Lieutenant J.G. grade and served as Health Physicist for U.S. Public Health Service. During this time was a member of the faculty of USPHS, Radiological Health Training Branch. Acted as consultant to hospitals, state and local governments, industrial concerns, and several research and educational institutions. During the nuclear weapons tests in 1951, was assigned to Los Alamos Scientific Laboratory in connection with fallout monitoring from ground zero to 50-75 miles downwind. Work ranged from emergency planning to direct supervision of emergency operations following several accidents involving radioisotopes. While in the Public Health Service, conducted research projects concerning long-term use of radium and decontamination methods. Was promoted to rank of Captain in 1979 as a reserve (inactive) officer.

U.S. Quartermaster Research and Development Laboratories (1948)

Employed as a Microbiologist and later as a Research Chemist. Helped establish tropical deterioration methods of evaluation of fungicides in paints, plastics and paper. Served on the National Research Council's research group investigating tropical deterioration and helped select and produce certain strains of fungi for test purposes. Member, Laboratory Safety Committee.

T.B. Hunter, San Francisco and Ballinger & Co., Philadelphia, PA (1947 to 1948)

Draftsman, junior engineer and laboratory design specialist. Helped design U.S. QMC R&D Lab.

Publications:

"Preparation of an Industry Profile: Study of Ionizing Radiation." J. Birdsong, editor, Centaur Associates, Inc., Washington, DC, March 1980. A comprehensive study of U.S. workers potentially exposed to radiation and evaluation of economic impacts of proposed reductions in permissible radiation limits. "An Economic Study of the Radionuclides Industry." J. Birdsong, editor, Centaur Associates, Inc., Washington, DC, February, 1980. A comprehensive study of the economic activity of 76 segments of the nuclear industry in the USA during 1967-1978. Mr. Gallagher provided technical guidance, collected and analyzed data from 800 interviews from about 200 organizations. He reviewed current licensing and regulatory practices of state and federal agencies. This report was prepared for the U.S. Nuclear Regulatory Commission.

Volume I	Environmental Health & Safety Control
Volume II	Employee Health & Safety Statistics & Records
Volume III	Organization & Administration of Hospital Employees
Volume IV	Special Information

R. G. Gallagher analyzed, edited and contributed a large number of sections in this series of reports of the first comprehensive study of the U.S. hospital industry. This work was done by Applied Health Physics, Inc. for the National Institute for Occupational Safety & Health (NIOSH), Public Health Service, U.S. Dept. of Health, Education & Welfare in 1974.

"Emergency Planning & Procedures" by R. G. Gallagher, Handbook of Radioactive Nuclides, edited by Y. Wang, Published by Chemical Rubber Co., Cleveland, OH, June, 1969.

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"Surface Contamination", edited by B. R. Fish. Published by Pergamon Press, LTD., London, W.I., 1967.

"Health Physics in Medical Applications", by R. G. Gallagher and M. L. Martin. Atomics, Vol. 18, No. 1 (Jan./Feb.) 1965.

"Radiation Accidents & Emergencies in Medicine, Research & Industry." Edited by L. H. Lanzl, J. H. Pingel, and J. H. Rust. Published by C. C. Thomas, Springfield, IL. 1965.

"Medical Aspects of Radiation Accidents", edited by E. L. Saenger. Published by U.S. Atomic Energy Commission, Supt. of Documents, U.S. Government Printing Office, Washington, DC. 1963.

"Testing Radium Capsules for Radon Leakage" by R. G. Gallagher, R. D. Evans and R. G. McAllister, Am. J. Roetg. Ra. Ther. & Nuclear Medicine, Vol., XC, No. 2 (Aug.) 1963.

"Thinking about Radioactivity?", by R. G. Gallagher. Atomics, 1962.

"Radioisotope Hazards Evaluation", by R. G. Gallagher. The National Insurance Buyer (July) 1961.

"In Plant Decontamination Hazards and Procedures", by R. G. Gallagher. Proceedings of the Nuclear Energy Training Course for Insurance Personnel. Published by Braun-Brumfield, Inc., Ann Arbor, MI. 1958.

"Radium Capsules & Their Associated Hazards", R. G. Gallagher, E. L. Saenger, Am. J. Roetg. Rad. Ther. & Nuclear Med. Vol. 77, No. 3 (March) 1957.

"Going into Radiation?", by R. G. Gallagher. Petroleum Processing (March) 1957.

"Long Term Radioactive Exposures, The Kelly Clinic Study", by R. G. Gallagher, M. R. Zavon, H. N. Doyle. Baltimore Health News, Vol. 22, No. 4 (April) 1955.

"Radioactive Contamination in a Radium Therapy Clinic", by R. G. Gallagher, M. R. Zavon, H. N. Doyle. Published in the Public Health Reports, Vol. 70, No. 7 (July) 1955.

"Automatic Sampler, Recorder" A. D. Hosey H. H. Jones O. C. Marsh, R. G. Gallagher, Nucleonics, Vol. 12, (December) 1954.

"Fireman Must Be Protected Against Radiation Hazards", by R. G. Gallagher, Occupational Health, Vol. 3 (March) 1953.

"Emergency Measures and Precautions in Radium Accidents", E. L. Saenger, R. G. Gallagher, D. S. Anthony, P. S. Valear, of American Medical Association, Vol. 149, June 28, 1952.

Also, ten technical papers were published in QM Research Reports the official publications of the Department of Defense Office of the Quartermaster General, Military Planning Division Research and Development Branch, (1948-1949).

Publications in Process:

"Lessons Learned at Chernobyl" (for publication in U.S. delegation to USSR Report 7/90.

"Radioactivity in MY Backyard?" to be published 8/90

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Curriculum Vitae - Robert G. Gallagher

"Environmental, Social and Economic Risks Associated with Underground Storage Tanks: Insurance and Current Impacts on Small Petroleum Marketers."

"Financial Impacts of Trials by Media": An analysis of direct and indirect costs incurred by TV expose of the environmental pollution problems at two manufacturing plants. This article describes the economic and sociological impacts of chronic low level radioactive contamination. It compares the reactions of top management of two international corperations and the results obtained as both companies responded to media reports of environmental risks by "stonewalling" versus "going public with facts".

"Loss Prevention Audits: The diagnosis and treatment of corporate myopis". An analysis of major financial and competitive losses that several multinational giants have experienced recently when environmental, occupational health and safety requirements were ignored. Values of annual audits of CPA's are compared with loss prevention audits by independent CSP's.

"Radiation Emergency Planning and Damage Control Procedures"

"Handbook Management of Radiation Protection Programs" of the CRC series, in Radiation Measurement and Protection, Allen Brodsky, ScD Editor-in-chief. Published by CRC Press, Inc. Boca Ratan, FL

"Financial Protection Against Radioactive Contamination: Insurance or Bonds?" R. G. Gallaghar and A. K. Gallaghar, CPCU.

Additional biographical information is contained in Who's Who in the East, Marquis, Inc., Chicago, IL; and American Men of Science, R.R. Bowker Co., New York (1965).

"SECTION COPY"

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ONCOLOGY SERVICES CORPORATION
110 REGENT COURT, SUITE 100
STATE COLLEGE, PA 16801

60-831/313

February 5, 1996

PAY TO THE ORDER OF Nuclear Regulatory Commission $ 460.00

Four Hundred and Sixty 00/100 DOLLARS

Commonwealth Bank
WEST
STATE COLLEGE, PA 16801

FOR License Amendment

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(4-79)
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L992

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

March 20, 1986

Docket No. 50-410

Mr. B. G. Hooten
Executive Director of Nuclear Operations
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Dear Mr. Hooten:

Subject: Request for Additional Information on Nine Mile Point 2; Generic Letter 83-28, Item 1.1 - Post-Trip Review

By letters dated April 10, 1984 and December 20, 1985 Niagara Mohawk responded to Generic Letter (GL) 83-28, "Required Action Based on Generic Implications of Salem ATWS Events," for Nine Mile Point 2.

In the course of our review of your responses the staff has identified the following significant review item:

1. The response to Action Item 1.1.1 referenced the plant operating procedures and the BWR Owners Group position. These documents need to be provided for our review.

2. The response to Action Item 1.1.6 did not provide adequate criteria for determining the need for independent assessment of the events following an unscheduled reactor trip.

3. The responses to Action Item 1.1 did not address the guidelines and procedures established to ensure that all the physical evidence necessary for an independent assessment of the event is preserved.

4. The responses to Action Item 1.1 did not provide a systematic safety assessment program to assess unscheduled reactor trip.

As noted above, much of the information requested concerning Action Item 1.1 of GL 83-28 has not been provided. Enclosure 1 contains a request for additional information for GL 83-28 Item 1.1. Please provide the information requested in Enclosure 1 within 30 days of the date of this letter.

Enclosure 2 contains review guidelines for GL 83-28, Item 1.1 and is being sent for your information to assist you in your response to Enclosure 1.

cc qa amd

8603260134

The staff would be happy to meet with you to discuss and resolve these issues.

Sincerely,

Mary F. Haughey

Mary F. Haughey, Project Manager
BWR Project Directorate No. 3
Division of BWR Licensing

cc: D. Shum
D. Vassallo

HC: T. R. Loomis } done
D. LoSurdo } GP

FILE COPY 7 7 4 9 0 8 GL 83-28 L992

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

March 20, 1986

RECEIVED
MAR 26 1986
NUCLEAR GENERATION

Docket No. 50-410

Mr. B. G. Hooten
Executive Director of Nuclear Operations
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

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NMPC-SYRACUSE
MAR 25 1986
Unit 2 Nuclear Licensing

RECEIVED
MAR 26 1986
B. G. HOOTEN

8603260134

20 (9a) amd

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Mary F. Haughey

Mary F. Haughey, Project Manager
BWR Project Directorate No. 3
Division of BWR Licensing

cc: D. Shum
D. Vassallo

4C: T. R. Loomis } 1 cy
D. LaSurdo } ea

Mr. B. G. Hooten
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit 2

cc:
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1747 Pennsylvania Avenue, N.W.
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Assistant Attorney General
Environmental Protection Bureau
New York State Department of Law
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Resident Inspector
Nine Mile Point Nuclear Power Station
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Norman Rademacher,
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Bethesda, Maryland 20814

NC: T. Loomis 3/26/86
D. LaSurdo 3/26/86

REQUEST FOR ADDITIONAL INFORMATION FOR GENERIC LETTER 83-28,

ITEM 1.1 - POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE

NINE MILE POINT NUCLEAR STATION, UNIT 2

DOCKET NO. 50-410

1. In the response to Action Item 1.1.1 of Generic Letter 83-28, you indicated that Nine Mile Point, Unit 2's criteria for determining the acceptability of restart are contained in the Interim Operating Procedure (N2-IOP-101A) which will be upgraded to a permanent operating procedure by startup. In addition, you indicated that Nine Mile Point, Unit 2 endorses the BWR Owners Group position with regard to Action Item 1.1.1. However, you have not provided this Interim Operating Procedure and the BWR Owners Group position for our review. We request that you provide the applicable portion of the Operating Procedure and the BWR Owners Group position with regard to Action Item 1.1.1 for our review. We will evaluate these criteria against the review guidelines developed as described in Section A of the attached Review Guidelines related to Generic Letter 83-28.

2. The response to Action Item 1.1.6 of Generic Letter 83-28 with regard to criteria for determining the need for independent assessment of the event following an unscheduled reactor trip is inadequate. We recommend that if any of the review guidelines (as described in Section A of the attached Review Guidelines related to Generic Letter 83-28) are not met, an independent assessment of the event should be performed by the Site Operations Review Committee or a group with similar authority and experience. Therefore, provide a revised response to reflect this recommendation.

3. Describe the guidelines and procedures established to ensure that all the physical evidence necessary for an independent assessment of the event is preserved.

4. You have not provided response to Action Item 1.1.7 of Generic Letter 83-28 which requires an applicant/licensee to provide for our review a systematic safety assessment program to assess unscheduled reactor trips. We recommend that you develop systematic safety assessment procedures in accordance with the review guidelines (as described in Section E of the attached Review Guidelines related to Generic Letter 83-28) to handle unscheduled reactor trips and provide these procedures for our review.

REVIEW GUIDELINES FOR GENERIC LETTER 83-28, ITEM 1.1 - POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE)

The following review guidelines were developed after initial evaluation of the various utility responses to Item 1.1 of Generic Letter 83-28 and incorporate the best features of these submittals. As such, these review guidelines in effect represent a "good practices" approach to post-trip review. We have reviewed the applicant's/licensee's responses to Item 1.1 against these guidelines:

A. The licensee or applicant should have systematic safety assessment procedures established that will ensure that the following restart criteria are met before restart is authorized.

- The post-trip review team has determined the root cause and sequence of events resulting in the plant trip.
- Near term corrective actions have been taken to remedy the cause of the trip.
- The post-trip review team has performed an analysis and determined that the major safety systems responded to the event within specified limits of the primary system parameters.
- The post-trip review has not resulted in the discovery of a potential safety concern (e.g., the root cause of the event occurs with a frequency significantly larger than expected).
- If any of the above restart criteria are not met, then an independent assessment of the event is performed by the Plant Operations Review Committee (PORC), or another designated group with similar authority and experience.

B. The responsibilities and authorities of the personnel who will perform the review and analysis should be well defined.

- The post-trip review team leader should be a member of plant management at the shift supervisor level or above and should hold or should have held an SRO license on the plant. The team leader should be charged with overall responsibility for directing the post-trip review, including data gathering and data assessment and he/she should have the necessary authority to obtain all personnel and data needed for the post-trip review.
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C. The licensee or applicant should indicate that the plant response to the trip event will be evaluated and a determination made as to whether the plant response was within acceptable limits. The evaluation should include:

- A verification of the proper operation of plant systems and equipment by comparison of the pertinent data obtained during the post-trip review to the applicable data provided in the FSAR.
- An analysis of the sequence of events to verify the proper functioning of safety-related and other important equipment. Where possible, comparisons with previous similar events should be made.

D. The licensee or applicant should have procedures to ensure that all physical evidence necessary for an independent assessment is preserved.

E. Each licensee or applicant should provide in its submittal, copies of the plant procedures which contain the information required in Items A through D. As a minimum, these should include the following:

- The criteria for determining the acceptability of restart.
- The qualifications, responsibilities and authorities of key personnel involved in the post-trip review process.
- The methods and criteria for determining whether the plant variables and system responses were within the limits as described in the FSAR.
- The criteria for determining the need for an independent review.

FILE COPY 7 7 4 9 0 6 8 Guidance LB 83-28 L992

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

March 20, 1986

RECEIVED
MAR 26 1986
NUCLEAR GENERATION

Docket No. 50-410

Mr. B. G. Hooten
Executive Director of Nuclear Operations
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Dear Mr. Hooten:

Subject: Request for Additional Information on Nine Mile Point 2; Generic Letter 83-28, Item 1.1 - Post-Trip Review

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NMPC-SYRACUSE
MAR 25 1986
Unit 2 Nuclear Licensing

RECEIVED
MAR 26 1986
B. G. HOOTEN

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The staff would be happy to meet with you to discuss and resolve these issues.

Sincerely,

Mary F. Haughey

Mary F. Haughey, Project Manager
BWR Project Directorate No. 3
Division of BWR Licensing

cc: D. Shum
D. Vassallo

HC: T. R. Loomis } done
D. LaSurdo } JP

Mr. B. G. Hooten
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station
Unit 2

cc:
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Resident Inspector
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Regional Administrator, Region I
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Commission
Nine Mile Point Nuclear Station -
Unit II
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Don Hill
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Suite 550
4520 East West HighWay
Bethesda, Maryland 20814

LPC: T. Loomis 3/26/86
D. LaSurdo 3/26/86

REQUEST FOR ADDITIONAL INFORMATION FOR GENERIC LETTER 83-28,

ITEM 1.1 - POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE

NINE MILE POINT NUCLEAR STATION, UNIT 2

DOCKET NO. 50-410

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POST-TRIP REVIEW (PROGRAM DESCRIPTION AND PROCEDURE)

The following review guidelines were developed after initial evaluation of the various utility responses to Item 1.1 of Generic Letter 83-28 and incorporate the best features of these submittals. As such, these review guidelines in effect represent a "good practices" approach to post-trip review. We have reviewed the applicant's/licensee's responses to Item 1.1 against these guidelines:

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- The methods and criteria for determining whether the plant variables and system responses were within the limits as described in the FSAR.
- The criteria for determining the need for an independent review.

FILE COPY

Generic Ltr 83-28

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

MAR 19 1985

Docket No. 50-410

Mr. B. G. Hooten
Executive Director, Nuclear Operations
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Dear Mr. Hooten:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - PRELIMINARY STAFF REVIEW OF GENERIC LETTER 83-28 RESPONSES, NINE MILE POINT NUCLEAR STATION-UNIT 2

The staff has completed a preliminary review to assess the completeness and adequacy of applicant/licensee responses to Generic Letter 83-28 Items 2.1, 2.2, 3.1.3, 3.2.3, 4.4 and 4.5. For Nine Mile Point 2, your responses were found to be incomplete for Items 2.1, 2.2.2, 3.1.3, 3.2.3 and 4.5.3. Brief descriptions of the deficiencies are provided as guidelines for corrective action in the enclosed request for additional information. Efforts by Owners Groups, INPO and NSSS vendors have been or are being made to produce generic responses that may be useful in meeting the requirements of Generic Letter 83-28 Items 2.1, 2.2.2, and 4.5.3. You may wish to contact these organizations regarding the applicability of such generic responses to your facility.

In order to preserve our present review schedule, the staff requests that you submit for review the supplementary information identified for Items 2.1, 2.2.2, 3.1.3 and 3.2.3 within 60 days and for Item 4.5.3 within 90 days. If you intend to formally endorse the BWR Owners Group response to Item 4.5.3 (NEDC-30844), please advise us within 60 days. Your plant specific response to Item 4.5.3 should then be provided within 90 days after the NRC completes its review and issues its evaluation of NEDC-30844. We request your cooperation in meeting this schedule.

This request for additional information was approved by the Office of Management and Budget under clearance number 3150-0011 which expires April

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MAR 21 198:
B. G. HOOTEN

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30, 1985. Comments on burden and duplication may be directed to the Office of Management and Budget, Reports Management Room 3208, New Executive Office Building, Washington, D.C. 20503.

Sincerely,

A. Schwencer

A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing

cc: See next page

Nine Mile Point 2

Mr. B. G. Hooten
Executive Director, Nuclear Operations
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

cc: Mr. Troy B. Conner, Jr., Esq.
Conner & Wetterhahn
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631 Park Avenue
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Norman Rademacher,
Licensing
Niagara Mohawk Power Corporation
300 Erie Boulevard West
Syracuse, New York 13202

Enclosure

NINE MILE POINT 2

Item 2.1 (part 1) - Incomplete

Licensee needs to submit his new Q List when complete. Has licensee committed to assuring that RTS components are identified as safety-related on all drawings, documents, and in information handling systems?

Item 2.2.2 - Incomplete

Licensee needs to present his evaluation of the NUTAC program and describe how it will be implemented at Nine Mile Point. The staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility. Accordingly the licensee will need to supplement his response to address this concern. This additional information should describe how current procedures will be modified and new ones initiated to meet the elements of this concern.

Item 3.1.3 - Incomplete

Licensee needs to state if he has found any post-maintenance testing requirements for RTS components that may degrade safety. If any such are identified the licensee shall describe actions to be taken including submitting needed Technical Specification changes.

Item 3.2.3 - Incomplete

Licensee needs to submit some type of information for safety-related components other than RTS that was required for Item 3.1.3.

Item 4.5.3 - Incomplete

Licensee needs to provide the results of his review of existing or the proposed BWROG intervals for on-line testing considering the concerns of sub-items 4.5.3.1 to 4.5.3.5 of the generic letter. The response shall show how these intervals result in high reactor trip system availability and present the proposed Technical Specification changes for staff review.

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the technical specification surveillance requirements. The licensee needs to address this conclusion.

NAL CORRESPONDENCE
R 02-80 55-01-013

0 7 7 4 9 8 7 2 8 5

NIAGARA MOHAWK

FROM T. R. Loomis

TO File

DISTRICT Syracuse

DATE April 2, 1986

FILE CODE

SUBJECT Notes of Conference Concerning Generic Letter 83-28

Date: March 31, 1986

Place: NRC Headquarters
Washington, DC

Participants	NMPC	NRC
	A. F. Zallnick	J. Cramer
	T. Loomis	M. Haughey
	R. Randall	D. Shum
		D. Lasser
		Argil Toalston

On March 31, 1986, a meeting was held with the above participants to discuss the NMP2 response to Generic Letter 83-28. The reviewers and their comments are as follows:

Joel Cramer

Section 1.2:

Mr. Cramer stated that after his review of the first portion of Section 1.2 (which concerns the process computer), he had the following comments:

> We need to ensure that we have included a complete list of SOE and analog time history variables. This list should be compared with the list provided in the October 18, 1985 letter to B. G. Hooten (on review guidance for this section). In the event that we don't have the required variables, we must provide justification. Additionally, we could utilize the SPDS variables provided it is supplied by a UPS and has hard data retention.

Sections 1.2.1.5 & 1.2.2.5:

We need to state that we retain all scram data for the life of the plant.

Section 1.2.2.2:

We need to state the sampling rate for the analog variables.

Section 1.2.2.3:

We need to retain the analog parameters at least ten minutes post-scram. If we don't have this capability, we can utilize the hard copy on the strip chart for the analog variable, if it exists, provided the strip charts utilize an uninterruptible power supply (UPS).

D. Shum

Section 1.1.1:

On page 1, we agreed to change paragraph 7.4.2 to include "and SORC has authorized restart."

A. Toalston

Sections 3.1.1, 3.1.2, 3.2.1, 3.2.2, 4.5.1:

Mr. Toalston stated that the region will perform the reviews. He also stated that we should read the requirement literally, perform the required reviews, and state the results of the reviews. (He was referring to the requirements of NUREG-1000, Vol. 2.) He also had additional comments on the following sections:

Section 3.2.1:

We need to make a definitive statement about the review of our maintenance procedures. We should make a clear reference to our technical control and review program.

Section 3.1.2:

We need to make a statement of what our review will consist. This can be done in a step-by-step manner (follow the guidelines of NUREG-1000, Vol. 2). Also, include a schedule. At a later date, we should submit another letter which states that the reviews have been completed.

Section 4.5.1:

The NRC wants NMPC to commit to performing maintenance on the backup scram pilot valves every 18 months. Additionally, we should pull our references to technical specifications and include the actual verbage that the technical specifications would include.

D. Lasser

Section 2.1 (page 2, fifth paragraph):

Add G.E.'s and NMPC's program for ensuring we have received all the SIL's.

Section 2.1 (last paragraph, page 2):

Provide more detail on the GE OEP program.

Section 2.1 (page 3):

We need to include information on the transition period for the vendor manuals. This can best be done by further describing NEL-014G.

Section 2.2.1.1:

R. Randall will include verbage which describes how subcomponents are classified as safety-related and nonsafety-related. General Physics is currently working on this task.

Section 2.2.1.2:

We need to describe how new items are added, changed and verified on the MEL. We also need to describe how unauthorized changes are prevented. We must also describe how this list will be presented as a singular unambiguous list.

Section 2.2.1.4:

Need to describe the management controls for utilizing the MEL.

Section 2.2.1.5:

We need to come up with the procedures. Additionally, we can reference the EQ program.

Section 2.2.2:

Mr. Lasser passed a long list of concerns on this section to Mr. Randall. These concerns appear to be a compromise program between what NUTAC and utility programs aimed towards. This response may warrant industry action. So far, Surry and Farley are the only other utilities which have committed to this program.

Section 4.5.2:

As stated before, we must commit to maintenance on the backup scram plot valves every 18 months, rather than every refueling outage.

Section 4.5.3:

The Owners' Group report has been reviewed, and it appears that the NRC will accept the Groups' analysis. We must include in our response a statement which says that we have compared our plant to the reference plant and we need to describe any differences.

Mr. Lasser passed an additional three pages of comments to Mr. Randall.

T Loomis

T. R. Loomis
Licensing Engineer

TRL:ja
1465G

xc: R. Randall (NMP1 site)
S. Nicolas (NMP1 site)
D. Losurdo
A. F. Zallnick, Jr.
N. L. Rademacher
R. B. Abbott
T. J. Perkins

8704090239 Generic 83-28

FILE COPY

NIAGARA MOHAWK

FROM T. R. Loomis

TO D. LoSurdo

DISTRICT Syracuse

DATE March 12, 1986 FILE CODE

SUBJECT Verification Documentation for Sections 2.2.1.1 and 2.2.1.5 of the April 10, 1984 Letter Concerning Generic Letter 83-28

The purpose of this memo is to aid in the verification of commitments made in response to Generic Letter 83-28.

On April 10, 1984, a letter was sent to the NRC which provides a partial response to Generic Letter 83-28. In that response, Section 2.2.1.1 committed to the following:

2.2.1.1 The criteria for identifying components as safety-related within systems currently classified as safety-related; this shall not be interpreted to require changes in safety classification at the systems level.

Response:

General criteria relative to classifying components as safety-related within safety-related systems are contained in FSAR Section 3.2 and Nuclear Regulatory Commission Regulatory Guide 1.26, Rev. 3. In addition, Engineering Procedures will provide a vehicle for various departments within Niagara Mohawk to request a determination as to the safety-related classifications of components and services. When appropriate, the Equipment Classification List (Q-List) will be updated to reflect such determinations.

In order to verify this commitment, attached is QAP 4.10. Within this procedure, attribute #2 provides the mechanism for Quality Assurance to determine the proper classification of the service, component, etc. It is my understanding that these procedures will be incorporated into the NMP2 operating procedures for startup. We anticipate that this procedure, along with the Unit 2 NEL procedure, which requires QA to review all purchase requisitions, will satisfy this commitment. Although not explicitly stated, it was our intent to have this action completed prior to startup.

Additionally, Section 2.2.1.5 of our April 10, 1984 letter made the following commitment in response to the NRC request:

2.2.1.5 A demonstration that appropriate design verification and qualification testing is specified for procurement of safety-related components. The specifications shall include qualification testing for expected safety service conditions and provide support for the licensees' receipt of testing documentation to support the limits of life recommended by the supplier.

Response:

Safety-related engineering specifications will contain qualification testing requirements. Equipment qualification information is discussed in FSAR Section 3.11.

Again, QAP 4.10 provides the necessary attributes to ensure that these procedures will be established. I refer to attributes 2, 5, 9, 12, 10 and 15, which adequately cover this commitment. Although not specifically stated in our response, attribute 10 verifies that the applicable testing and inspection requirement plus acceptance criteria are to be included. This attribute will address the limits of life of a particular component.

If you have any questions relating to this material, please contact me.

T. R. Loomis
Licensing Engineer

TRL:ja
1413G

xc: A. F. Zallnick, Jr.
S. Nicolas
R. Randall
M. Brause
Project File (2)

NIAGARA MOHAWK POWER CORPORATION

QUALITY ASSURANCE PROCEDURE 4.10

REVISION 5

TITLE

REVIEW OF NMPC PROCUREMENT DOCUMENTS
FOR QUALITY CONTENT

SUPERSEDES

QAP 4.10, REV. 4
QAP 4.20, REV. 1 and CN1

APPLICABILITY

QUALITY ASSURANCE DEPARTMENT

ISSUE DATE

May 29, 1985

APPROVED BY: _____
DIRECTOR, QUALITY ASSURANCE

1.0 GENERAL

A procurement document identifies the requirements which purchased items and services must meet in order to be acceptable. To assure that delivered items and services meet design bases and applicable regulatory requirements, procurement documents must contain the necessary technical and quality requirements commensurate with the function to be performed by the item or service. REV. 5

2.0 SCOPE

This Quality Assurance Procedure (QAP) describes the process by which the Niagara Mohawk Power Corporation (NMPC) Quality Assurance Department (QAD) performs and documents reviews of NMPC-originated procurement documents to assure adequate quality content. NMPC-originated procurement documents include Purchase Requisitions (PRs) and Purchase Orders (POs) with any associated specifications and drawings; and changes to PRs and POs. This QAP applies from the time a procurement document is received by QAD until the QAD review is completed and the procurement document is forwarded to the responsible organization.

3.0 PURPOSE

This QAP provides a uniform method for QAD review of NMPC-originated procurement documents to assure adequate quality content.

4.0 RESPONSIBILITIES

Each Manager-QA (Section) whose work scope includes procurement document review is resporsible for overall compliance with this QAP. REV. 5

Each QA Supervisor whose scope of work includes procurement document review shall assign QAD personnel to review procurement documents and shall assure that reviews are performed in a timely manner and are properly documented. The QA Supervisor shall assure that assigned personnel are trained in this QAP and related material as appropriate. REV. 5

Assigned QAD personnel shall perform procurement document reviews in accordance with this QAP.

5.0 PROCEDURE

5.1 General Requirements

All nuclear-related NMPC procurement documents (except office supplies) and all changes and releases to such documents are transmitted to QAD for quality content review in accordance with appropriate project or departmental procedures. Procurement documents for other activities or projects will be reviewed as determined on an individual basis.

5.0 PROCEDURE (Continued)

5.1 General Requirements (Continued)

The primary procurement document reviewed is the NMPC Purchase Requistion (PR) or Request for Quotation, including any applicable specifications, drawings, or other attachments.

Procurement documents shall be date stamped, logged, and tracked while in the custody of QAD to facilitate traceability and assure prompt processing.

5.2 Checklists

Procurement document reviews shall be documented on a Procurement Document Checklists, Attachment 7.0-a. This QAP shall be used for review of nuclear-related procurement documents. This checklist may be supplemented with additional attributes when deemed necessary by the Manager-QA (Section). Alternate checklists may be developed for other applications, provided the applicable attributes from Attachment 7.0-a are included.

5.3 Review

Upon receipt of a procurement document and any associated specifications and drawings, the assigned reviewer will review the documents to ensure that appropriate quality-related provisions have been included. The reviewer shall address all attributes on the checklist. Explanation for each attribute is provided in the instructions for Attachment 7.0-a. Upon completion of review, the reviewer shall sign and date the checklist.

5.4 Results of Reviews REV. 5

If the procurement document is acceptable, the reviewer shall sign and date the approval block and, if applicable, check the "Receipt Inspection Required" block. (Stamps shall be used when appropriate blocks are not on the referenced form.) The procurement document is then returned to the responsible organization and the procurement document log is updated.

If the procurement document appears to be unacceptable, the reviewer shall discuss the unacceptable condition with the responsible organization. If the unacceptable condition can not be resolved verbally, then the reviewer shall document the deficiency and detail the justification on the checklist. The unacceptable condition shall be discussed with the Supervisor before forwarding the procurement document to the responsible organization.

When a procurement document is resubmitted, it shall be reviewed for correction of previously documented deficiencies. If the procurement document is found to be acceptable, it shall be signed and dated, returned to the responsible organization, and the associated checklist shall be updated to indicate the unsatisfactory condition has been corrected. The procurement document log shall be updated.

5.4 Results of Reviews (continued)

Following the subsequent processing of the associated purchase order, the reviewer should review the purchase order to ensure that the provisions of the QA-accepted document are included. If a purchase order is found lacking or discrepant as issued, a CAR shall be initiated in accordance with QAP 16.03, Corrective Action Requests.

5.5 Revision to Procurement Documents

Subsequent changes/addenda to procurement documents require the same review as the original documents. The review will also include the following:

a) A check to verify that NMPC QAD comments from the review of the original procurement document have not been deleted. This can be accomplished by reviewing the original document or a copy of same.

b) A check to ensure that each change to the procurement document does not adversely affect the original quality assurance requirements.

c) When the Purchasing Department revises a site orginated purchase requisition and routes it through the QAD for re-approval, the QAD reviewer will initial and date the requisition next to the orginal review acceptance stamp. REV. 5

5.6 Records

The procurement document will ultimately be retained in the station document control system. For informational purposes, a copy of the checklist and any written comments may also be retained in the QAD files as appropriate. REV. 5

6.0 REFERENCES

a) AP-7.0 Procedure for Control of Material and Service REV. 5

b) AP-7.1 Procedure for Control of the Use and Transfer of Organic Materials

c) QAP 16.03 Corrective Action Requests

d) ANSI/ASME NQA-1-1983 - Quality Assurance Program Requirements for Nuclear Facilities. (NOTE: Reference becomes mandatory when a commitment for compliance has been incorporated in the Quality Assurance Program for operation at Nine Mile Point Units 1 and 2.) REV. 5

6.0 REFERENCES (continued)

e) ANSI/ANS-3.2-1982 - Administrative Controls and Quality Assurance for Operational Phase of Nuclear Power Plants. (NOTE: Reference becomes mandatory when a commitment for compliance has been incorporated in the Quality Assurance Program for operation of Nine Mile Point Units 1 and 2.) REV. 5

7.0 ATTACHMENTS

a) Procurement Document Review Checklist

b) Examples of QAD Stamps

INSTRUCTIONS FOR COMPLETING THE PROCUREMENT DOCUMENT REVIEW CHECKLIST

BLOCK #	INSTRUCTION	RESPONSIBILITY	
1	Indicate major order or other appropriate number.	QAD Reviewer	
2	Note date the PR was receipt-stamped by QAD.	QAD Reviewer	
3	Record the PR number.	QAD Reviewer	
4	Record PR change number, if applicable, or "NA".	QAD Reviewer	
5	Enter the NMPC location or facility for which the procurement is being made.	QAD Reviewer	
6	Identify the project or activity to which the procurement applies.	QAD Reviewer	
7	Check "Sat", "Unsat", or "NA" for each attribute and note any remarks in the space provided.	QAD Reviewer	
8	Record any general explanatory remarks, including resolution of "Unsat" attributes.	QAD Reviewer	REV. 5
9	Sign and date completed checklist.	QAD Reviewer	

EXPLANATION OF CHECKLIST ATTRIBUTES

ATT. #	EXPLANATION
1	Verify the purchase requisition presented is: a. Form #211-1 (NMPC System Bulletin No. 122) Purchase Requisition or b. Form #211-3 (NMPC System Bulletin No. 123) Bill of Materials/Purchase Requisiton or c. Other approved forms. If Form #211-1 is used, verify it has been signed by an authorized supervisor/lead or storekeeper and approved by an authorized departmental supervisor only. If Form #211-3 is used, verify the "preparer" has initialed or signed the section "By". Verify the individual doing the checking has initialed or signed the section "Chk". (These steps shall not be performed by the same individual.)

EXPLANATION OF CHECKLIST ATTRIBUTES

(Continued)

ATT. #	EXPLANATION
2	Verify the safety-classification indicated is correct. (The procurement document should list the system title, system number, and equipment piece number, as applicable in conjunction with the Q-list in EP-020. If a question exists to the proper classification, you may submit a Request for Determination to Licensing, per EP-190.)
3	Verify the following references are included, as applicable: a 10CFR50, Appendix B, b 10CFR21, c NMPC "Right of Access" statement, d NMPC Purchase Requisition requirements shall be passed on to subtier vendors/contractors, e NMPC requirements to the vendor/contractor for reporting and approving disposition of nonconformances.
4	Verify referenced letters and proposals from selected vendors are included with the PR for review.
5	Verify the requisitioner has included appropriate special process procedures, if applicable, such as welding, heat treating, etc. or shall direct the Contractor to include them. The requisitioner shall have the Contractor submit his procedures to the Project Quality Assurance member for review. The requisitioner must review and approve the technical aspects of these procedural documents at the time of the request for bids. REV. 5
6	If specified, verify the vendor/contractor is qualified by reviewing the Qualified Contractors List (QCL) and vendor/contractor file. NOTE: If a vendor/contractor has expired from the QCL, a purchase order may still be placed if historical data, etc. indicates acceptable performance. However, a statement must be added to the procurement document stating: Acceptance of material, equipment, and services is subject to a requalification survey by the NMPC QAD.
7	Verify, if applicable, the procurement document includes those special requirements for a vendor/contractor that has been conditionally qualified.
8	Verify equipment being procured is not on the "Excluded Equipment List", per EP-240.

EXPLANATION OF CHECKLIST ATTRIBUTES

(Continued)

ATT. #	EXPLANATION
9	Verify the following requirements are adequately included as applicable: a. ANSI N45.2: Quality Assurance Program Requirements for Nuclear Power Plants. b. ANSI N45.2.1: Cleaning of Fluid Systems and Associated Components during Construction Phase of Nuclear Power Plants and Regulatory Guide 1.37. Is the degree of cleanliness described, i.e., Class A, B, C, or D, et cetera? c. ANSI N45.2.2: Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants (During the Construction Phase), and Regulatory Guide 1.38. Level A, B, C, or D? Packaging, shipping, receiving, storage, handling, records, et cetera. d. ANSI N45.2.3: Housekeeping during the Construction Phase of Nuclear Power Plants, and Regulatory Guide 1.39. Zone I, II, III, IV, or V, et cetera. REV. 5 e. ANSI N45.2.4: Installation, Inspection and Testing Requirements for Instrumentation and Electrical Equipment during the Construction of Nuclear Power Generating Stations (IEEE 336) and Regulatory Guide 1.30. Identification of Class I equipment and Class IE electrical systems. Preconstruction Verfication; Installation; Verification during Construction; Post-construction Verification; Data Analysis and Evaluation; Records; Applicable Codes, Standards and Guides, et cetera. f. ANSI N45.2.5: Supplementary Quality Assurance Requirements for Installation, Inspection and Testing of Structural Concrete and Structural Steel during the Construction Phase of Nuclear Power Plants and Regulatory Guide 1.94 (Unit 2). Planning, Procedures and Instructions, Results, Personnel Qualifications, Measuring and Test Equipment, et cetera. g. ANSI N45.2.6: Qualification of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants and Regulatory Guide 1.58. Qualifications, Performance, Records, et cetera.

EXPLANATION OF CHECKLIST ATTRIBUTES

(Continued)

ATT. #	EXPLANATION
9	h. ANSI N45.2.8: Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Mechanical Equipment and Systems for the Construction Phase of Nuclear Power Plants and Regulatory Guide 1.116 (Unit 2). Planning; Procedures and Instructions; Results; Cleaning, Receiving, Storage and Handling; Housekeeping; Personnel Qualifications; Measuring and Test Equipment; Prerequisites; Pre-installation Verification; Control During Installation Process; et cetera.
	i. ANSI N45.2.9: Requirements for Collection, Storage, and Maintenance of Quality Assurance Records and Regulatory Guide 1.88 (Unit 2). General Requirements; Technical Requirements; Receipt of Records, Storage Preservation and Safekeeping; Retrieval; Disposition, et cetera.
	j. ANSI N45.2.10: Quality Assurance Terms and Definitions and Regulatory Guide 1.64.
	k. ANSI N45.2.11: Quality Assurance Requirements for the Design of Nuclear Power Plants and Regulatory Guide 1.64. Program Requirements, Design Input Requirements, Design Process, Interface Control, Design Verification, Document Control, Design Change Control, Corrective Action, Records, Audits, et cetera.
	l. ANSI N45.2.12: Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants and Regulatory Guide 1.144 (Unit 2). Personnel, Audit System, Audit Implementation, Records, et cetera. REV.
	m. ANSI N45.2.13: Quality Assurance Requirements for Control of Procurement of Items and Services for Nuclear Power Plants and Regulatory Guide 1.123 (Unit 2). Planning; Procurement Document Preparation, Review and Change Control; Selection of Procurement Sources; Bid Evaluation and Award; Purchaser Control of Supplier Performance; Verification Activities by Purchaser; Control of Nonconformances; Corrective Action; Acceptance of Item or Service; Quality Assurance Records; Audit of Procurement Program; et cetera.
	n. ANSI N101.4: Quality Assurance for Protective Coatings Applied to Nuclear Facilities and Regulatory Guide 1.54. Coating Materials, Surface Preparation of Substrates, Appplication of Coating Systems, Coating Inspection, Quality Assurance Documentation, et cetera.
	o. ANSI N45.2.23: Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants and Regulatory Guide 1.146 (Unit 2).
10	Verify that applicable testing and inspection requirements plus acceptance criteria are included.

EXPLANATION OF CHECKLIST ATTRIBUTES

(Continued)

ATT. #	EXPLANATION
11	Verify required "hold" points for customer inspection are adequately specified and described.
12	Verify the procurement document has imposed applicable codes, standards and specifications, e.g., ASME, ANSI, ASTM, IEEE, etc., and when the code provides options, does the procurement document specify which option(s) is to be applied? Each reference to codes and/or standards shall include the date of issue or approval and applicable addenda. Only the portions of the code(s) that need to be applied should be referenced.
13	Verify receipt inspection criteria has been addressed (all safety-related and Appendix R fire protection materials must be receipt inspected) including acceptance criteria.
14	Verify identification/marking of materials is specified. Means of identification shall include, but are not limited to the following: Traceability by means of heat number, serial number, part number, or other suitable means, such as Major Order number, Purchase Order number, et cetera. Assurance that the traceability will not be obliterated or lost during fabrication, erection, installation, and use of the item. Identification shall be marked directly on the item or on records traceable to the item as approved by the responsible organization. REV.
15	Verify required documentation has been identified and specified if it should be shipped with the item(s), under separate cover, or both. Examples of such documentation include test reports, instruction and erection manuals, certificates of conformance or compliance, chemical and physical test reports, personnel qualifications, etc.
16	Verify, if applicable, a Documentation Record form has been prepared per QAP 7.30 and attached to the Procurement Document.
17	Verify that, if Fire Protection System materials, equipment and/or services are involved, the procurement document complies with the requirements of the Fire Protection Quality Assurance Program.
18	Verify that, if Organic Materials are being procured, the applicable requirements of AP-7.1 "Procedure for Control of the Use and Transfer of Organic Materials" have been incorporated in the purchase document.
19	Verify, if applicable, a Quality Control Pre-planning Inspection sheet per AP-7.0 has been completed.
20	Verify replacement parts have been procured in accordance with site AP-7.0.

NIAGARA MOHAWK

PROCUREMENT DOCUMENT REVIEW CHECKLIST

MAJOR ORDER NUMBER _____ (1) DATE RECEIVED: _____ (2)

PURCHASE REQUISITION NO. _____ (3) CHANGE NO.: _____ (4)

LOCATION: _____ (5)

PROJECT: _____ (6)

(7)	SAT	UNSAT	NA	REMARKS
1. LATEST PURCHASE REQUISITION FORM/APPROVALS				
2. SAFETY CLASSIFICATION				
3. a. 10CFR 50, APP. B/10CFR 21 REFERENCE				
b. "RIGHT OF ACCESS" STATEMENT				
c. EXTENSION OF REQUISITION TO SUB-VENDORS/CONTRACTORS				
d. VENDOR REPORTING PROCEDURE FOR NONCONFORMANCES				
4. REFERENCED DOCUMENTS ATTACHED				
5. SPECIAL PROCESS PROCEDURE INCLUDING DOCUMENTS REQUIRING NMPC ACCEPTANCE PRIOR TO START OF WORK				
6. VENDOR/CONTRACTOR QUALIFIED FOR ITEMS/SERVICES				
7. SPECIAL VENDOR/CONTRACTOR PROVISIONS FROM QCL INCLUDED				
8. ITEMS NOT ON EXCLUDED EQUIPMENT LIST				
9. ANSI N45.2 SERIES SPECIFIED AS APPLICABLE				
10. TEST & INSPECTION REQUIREMENTS & CRITERIA				
11. HOLD POINTS SPECIFIED				
12. APPLICABLE CODES AND STANDARDS				
13. RECEIPT INSPECTION CRITERIA				
14. MATERIAL IDENTIFICATION, MARKING & TRACEABILITY REQUIREMENTS				
15. MATERIAL CERTIFICATION REQUIREMENTS				
16. DOCUMENTATION RECORD FORM - ENG./QA				
17. FIRE PROTECTION PROGRAM - QA REQUIREMENTS				
18. ORGANIC MATERIAL RESTRICTIONS - AP-7.1				
19. QC PRE-PLANNING INSPECTION SHEET, IF APPLICABLE				
20. a. REPLACEMENT PARTS IN ACCORDANCE WITH AP-7.0				
b. EQUAL TO/OR BETTER THAN STATEMENT, INCLUDED				

REMARKS. (8)

PREPARED BY (9) DATE

122-6.13.85

REV.

INTERNAL CORRESPONDENCE
FORM 112-2 R 07-80 55-01-013

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NIAGARA MOHAWK

FROM A. F. Zallnick, Jr.

TO Mr. R. G. Randall

DISTRICT Syracuse

DATE January 28, 1986 FILE CODE

SUBJECT Commitments in Response to Generic Letter 83-28

This letter is in reference to my January 16, 1986 memo to T. J. Perkins concerning the same subject. In the January 16, 1986 memo, Licensing requested that all actions related to Generic Letter 83-28 be completed prior to fuel load. This memo reaffirms the completion date of February 24, 1986 as the final date to complete actions related to Generic Letter 83-28.

A. F. Zallnick, Jr.
Manager - Nuclear Licensing

AFZ/TRL:ja
1268G

xc: S. Nicolas
R. G. Smith (NMP-1 Site)
K. A. Dahlberg (NMP-1 Site)
R. Coon (NMP-1 Site)
P. Mangano (NMP-1 Site)
W. Yaeger
W. C. Drews
M. Jones

ERNAL CORRESPONDENCE

ORM 112 R 02-80 55-01-013

FILE COPY

Zallnick

NIAGARA MOHAWK

FROM SC Nicolaos

TJ Perkins

DISTRICT Nine Mile Point Nuclear Station

DATE 1/8/86

FILE CODE NMP-13696

SUBJECT Commitments Made in Niagara Mohawk Letter NMP2L 0566

The following is a list of actions and responsible departments regarding Niagara Mohawk's commitment to Generic Letter 83-28, "Required Actions Based on Generic Implications of Salem ATWS Events".

1. Develop Reactor Analysis procedure "Post Reactor Scram Analysis and Evaluation" (Ex: N2-RAP-6). Incorporating guidance provided in Generic Letter 83-28, Section 1.1.

   Due Date - February 28, 1986
   Responsibility - Site (Reactor Physics/RG Smith, Technical Support/ RG Randall)

2. Review maintenance procedures to assure any classification information is correct. Guidance is provided in Generic Letter 83-28, Section 2.1.

   Due Date - February 28, 1986
   Responsibility - Site (Maintenance/KA Dahlberg, I&C/R. Coon)

3. Address the analog trend history monitoring system data and information capability. Guidance provided in Generic Letter 83-28, Section 1.2.

   Due Date - June 30, 1986
   Responsibility - Site (Computer Operations/P. Mangano)

4. Address General Electric SIL's, (Reactor Trip System Vendor) documents pertaining to the Reactor Trip System. Guidance provided in Generic Letter 83-28, Section 2.1.

   Due Date - June 30, 1986
   Responsibility - Site (Technical Support/RG Randall)

5. New program implemented to ensure controlled copies of technical manuals are current.

   Due Date - June 30, 1986
   Responsibility - Site (Central File/B. Yaeger)

6. Review I&C Department procedures with respect to Post-Maintenance testing for reactor trip components. Guidance provided in Generic Letter 83-28, Section 3.1.

   Due Date - March 31, 1986
   Responsibility - Site (I&C/R. Coon)

7. Review maintenance procedures with respect to post-maintenance testing for reactor trip components. Guidance provided in Generic Letter 83-28, Section 3.1.

   Due Date - February 28, 1986
   Responsibility - Site (Maintenance/KA Dahlberg)

8. Review Technical Specifications with respect to post-maintenance testing for all safety related equipment. Guidance provided in Generic Letter 83-28, Section 3.1.

   Due Date - June 30, 1986
   Responsibility - Engineering and Site (Licensing/A. Zallnick, Technical Dept./WC Drews)

9. Review GE SIL's on all other safety-related equipment and incorporate into procedures, as appropriate.

   Due Date - December 31, 1986
   Responsibility - Site (Technical Support/RG Randall)

10. Address potential Technical Specification improvements.

    Due Date - June 30, 1986
    Responsibility - Engineering and Site (Licensing/A. Zallnick, Technical Dept./WC Drews)

11. Review I&C Department procedures with respect to post-maintenance testing of safety-related equipment other than reactor trip components. Guidance provided in Generic Letter 83-28, Section 3.2.

    Due Date - March 31, 1986
    Responsibility - Site (I&C/R. Coon)

12. Review maintenance procedures with respect to post-maintenance testing of safety-related equipment other than reactor trip components. Guidance provided in Generic Letter 83-28, Section 3.2.

    Due Date - February 28, 1986
    Responsibility - Site (Maintenance/KA Dahlberg)

13. Develop procedure for Functional testing of scram pilot valves and back-up scram valves during refueling outages.

    Due Date - June 30, 1986
    Responsibility - (Operations/M. Jones)

SCN/rjb

cc (with attachment)

TE Lempges	RB Abbott	WC Drews	AF Zallnick
RG Smith	RG Randall	KA Dahlberg	R Coon
P Mangano	B Yaeger	T Loomis	P Mazzaferro
D LoSurdo	J Dominey	M Jones	JR Spadafore