

- f. Any other matters involving safe operation of the nuclear power plant which a reviewer deems appropriate for consideration, or which is referred to the independent reviewers.

#### 6.5.2.6 QUALIFICATIONS

The independent reviewer(s) shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the area being reviewed or have 9 years of appropriate experience in the field of his speciality. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

#### RECORDS

- 6.5.2.7 Reports of reviews encompassed in Section 6.5.2.5 shall be prepared, maintained and transmitted to the cognizant division Vice President.

#### 6.5.3 AUDITS

- 6.5.3.1 Audits of unit activities shall be performed in accordance with the TMI-1 Operational Quality Assurance Plan. These audits shall encompass:
  - a. The conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions.
  - b. The performance, training and qualifications of the entire unit staff.
  - c. The verification of the non-conformances and corrective actions program to be properly implemented and documented as related to action taken to correct deficiencies occurring in unit equipment, structures, systems or methods of operation that affect nuclear safety.
  - d. The performance of activities required by the Operational Quality Assurance Plan to meet the criteria of Appendix "B" 10 CFR 50.
  - e. The Emergency Plan and Implementing procedures.
  - f. The Security Plan and implementing procedures.
  - g. The Fire Protection Program and implementing procedures.
  - h. The Offsite Dose Calculation Manual (ODCM) and implementing procedures.

- i. The Process Control Program and implementing procedures for solidification of radioactive wastes.
- j. The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December, 1977.
- k. Any other area of unit operation considered appropriate by the IOSRG or the Office of the President - GPUN.

6.5.3.2 Audits of the following shall be performed under the cognizance of the vice president responsible for technical support:

- a. An independent fire protection and loss prevention program inspection and audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.

#### RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 60 days after completion of the audit. Upper management shall be informed per the Operation Quality Assurance Plan.

#### 6.5.4 INDEPENDENT ONSITE SAFETY REVIEW GROUP (IOSRG) STRUCTURE

6.5.4.1 The IOSRG shall be a full-time group of engineers, experienced in nuclear power plant engineering, operations and/or technology, independent of the unit staff, and located on site.

#### ORGANIZATION

- 6.5.4.2 a. The IOSRG shall consist of a manager and a minimum staff of 3 members who meet the qualifications of 6.5.4.5. Group expertise shall be multi-disciplined.
- b. In the event of an unanticipated vacancy in the IOSRG staff, the number of staff can be two (2) members for a period of not to exceed six (6) months while the vacancy is being filled.
- c. The IOSRG shall report to the director responsible for nuclear safety assessment.