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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: Three Mile Island Nuclear Station Unit 1 (TMI-1)
License No. DPR-50 (Docket No. 50-289)
Oyster Creek Nuclear Generating Station
License No. DPR-16 (Docket No. 50-219)
GPUNC OQA Plan, Revision 3, 4 and 5

Pursuant to 10CFR50.54(a)(3), enclosed are Revisions 3, 4 and 5 of the Operational Quality Assurance Plan for Three Mile Island Unit 1 and Oyster Creek. GPUN has determined that these revisions do not reduce the commitments previously approved by the NRC. Attachment 1 lists the changes of Revision 3, 4 and 5 and provides the basis for the changes. Attachment 2 is the revised Operational Quality Assurance Plan for Three Mile Island Unit 1 and Oyster Creek.

If further information is required, please call Mr. Michael Heller, Licensing Engineer, at (609)971-4680.

Very truly yours,

F.B. Fiedler
Vice President and Director
Nuclear Assurance

PBF/MH:jc
Attachments
(C3212009)

cc: Administrator, Region 1
Senior NRC Resident Inspector

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List of Changes
GPUN Operational QA Plan
Revision 3

1. Appendix C Part 2, Regulatory Guide 1.58 Rev. 1. The exception to this Regulatory Guide has been revised to allow the use of later editions of SNT-TC-1A provided that that edition is endorsed by an edition of Section XI of the ASME Boiler and Pressure Vessel Code which has been incorporated by reference into 10CFR50.55(a).

The reason for this change is to allow the use of 1980 edition of SNT-TC-1A in conjunction with the provisions of ASME Section XI. It was desired to use the 1980 Edition because of the improved qualification and certification guidelines for Level III. Specifically, the usage of ASNT developed Level III examination questions, which were more in line with the broader responsibilities of the Level III position and were not available at the time the 1975 Edition was issued, was desired.

This change is not a reduction in prior commitment because SNT-TC-1A provides an improved examination process for Level III's and not used alone. It is used in the context of and concurrent with ASME Section XI to the extent currently committed to by GPUN. As such, the "guidelines" of the standard are "requirements" as applied. Furthermore, the use of future revisions of that standard as may be invoked by future revisions to ASME Section XI would not be a reduction in prior commitment because the use of future editions of this standard would be automatically endorsed by the NRC through the endorsement of the ASME Section XI revision. As a point of emphasis, GPUN is not requesting nor implying that its commitment to a specific edition of ASME Section XI would or could be changed prior to NRC review.

List of Changes
GPUN Operational QA Plan
Revision 4

1. General. Organizational titles have been revised as necessary throughout the text. This change is editorial in nature to assure consistency of the text of the Plan with Section 1 of the Plan. As such this is not a reduction in prior commitment.
2. General. The phrase "measuring and test equipment" has been changed to "MT&E" in a majority of instances. This change is editorial in nature. It represents a preferential use of an acronym to assure clarity of the Plan text. As such, this is not a reduction in prior commitment.

3. Section 1.1. The first paragraph has been deleted. That paragraph has been replaced by the "Office of the President". The title "Office of the President" has also replaced the title "President". This change of editorial in nature and directed towards reducing the level of unnecessary organizational detail to reduce the need to revise this Plan. As such, this is not a reduction in prior commitment.
4. Section 1.4. The title Director - Administration has been changed to Director - Administration and Finance. The phrase "maintaining and implementing procurement, warehouse, and plant security programs" has been replaced by "maintaining, and implementing procurement and warehousing plans and/or procedures". This change is editorial in nature and indicates the reassignment of responsibility for plant security programs to the Site Services Director. Refer to Section 1.6. This change is not a reduction in prior commitment because the explicit assignment of responsibility for plant security programs has been maintained within the text of the OQA Plan.
5. Section 1.5. The title Director - Quality and Training has been changed to Director - Nuclear Assurance. The text associated with the previous section numbered 1.9 has been incorporated into this section. The previous title Director - Radiological and Environmental Controls is no longer a separate GPUN Division Director title. The sentence "The Director's ... practices and procedures; and, establishing, maintaining and delivering training and education programs sufficient to assure safe, reliable and efficient operating in accordance with Corporate Policies..." now reads the "The Director's ... practices and procedures; establishing, maintaining and delivering training and education programs sufficient to assure safe, reliable and efficient operation; establishing, implementing and maintaining radiological controls, radiological environmental monitoring, emergency preparedness, medical examination, and fitness for duty testing plans and procedures consist with Corporate Policies...". This change is editorial in nature and indicates the reassignment of Radiological Controls, Radiological Environmental, Emergency Preparedness, Medical Examinations and Fitness-For-Duty activities to the newly formed Nuclear Assurance Division. This change is not a reduction in prior commitment because the explicit assignment of responsibility for these activities has either been maintained or inserted within the text of the OQA Plan.
6. Section 1.6. The title Director - Maintenance, Construction and Facilities has been changed to Director - Site Services. The sentence "The Director's ...implementing policies, practices and procedures for managing, planning and conducting all maintenance, repair, and construction activities; and to conduct all plant modifications, maintenance, repair, construction and welding activities as assigned..." now reads "The Director's ...implementing plans and procedures for managing, planning and conducting maintenance, repair and construction activities; constructing plant modifications as assigned, and conducting maintenance, repair, and construction activities as assigned...". Text has been added to indicate the assignment of responsibilities for nuclear plant security, security screening, safeguard contingencies, security guard force training and qualification. This change is editorial in nature. This change is not a reduction in prior commitment because the explicit assignment of responsibility for these activities has either been maintained or inserted within the text of the OQA Plan.

7. Section 1.8. A new title Director - Independent Safety Review has been established. This title had no previous section number assigned. Text has been added to indicate the assignment of responsibility for nuclear safety assessment and review activities. This responsibility had been previously assigned to the position titled Director - Planning and Nuclear Safety (refer to 1.9 below). This change is not a reduction in prior commitment because the explicit assignment of responsibility for these activities has either been maintained or inserted within the text of the OQA Plan.
8. Section 1.9. The title Director - Planning and Nuclear Safety, which had been previously numbered as Section 1.8, has been changed to Director - Corporate Services. The text has been revised to reflect the transfer of nuclear safety assessment activities to the position titled Director - Independent Safety Review and the addition of the responsibility for the GPUN Fitness-For-Duty Program. This change is not a reduction in prior commitment because the explicit assignment of responsibility for these activities has either been maintained or inserted within the text of the OQA Plan.
9. Exhibit 1. This exhibit has been updated to be consistent with the revised text of Section 1.0 of this Plan. As such, this is not a reduction in prior commitment.
10. Exhibit 2. This exhibit has been revised to reflect a QA department reorganization. That reorganization is not a reduction in prior commitment. The independence of the QA department has not been effected; non of the QA department responsibilities, that derive from the QA Plan, had been transferred to another GPUN organizational unit.
11. Section 2.2.2. The terms "security screening" and "fitness-for-duty" have been added. This addition is consistent with the Plan directly identifying activities that are within the scope of the Plan. As such, this is not a reduction in prior commitment.
12. Section 2.5.1. Editorial changes have been made to conform to current GPUN organizational titles. These include Director - Administration and Finance, Director - Corporate Services, Director - Independent Safety Review, Director - Nuclear Assurance, Director - Site Services and Administrative Support Manager. As such, this is not a reduction in prior commitment.
13. Section 6.5.2.1(b) and (c). Previous subsection (b) and (c) have been retained and redesignated as (d) and (e). New statements have been added and designated as (b) and (c). This change was made as a result of the fact that maintenance can be performed by the plant divisions as well as Site Services. As part of this, the responsibility to conduct post maintenance testing and to maintain the adequacy of maintenance procedures is included. This change is editorial and provides consistency with the GPUN Organization Plan. This change is not a reduction in prior commitment because the explicit assignment of responsibility for these activities has been increased within the text of this Plan.

14. Section 6.5.2.3(b). The sentence "Prescribing and performing the construction..." has been changed to "Prescribing, performing and/or ensuring the performance of construction...". This change was made to conform the text of the Plan to the situation where Site Services would be "managing" instead "performing" construction or maintenance. As part of this, the responsibility to conduct construction or post maintenance testing is augmented by "ensuring" that such testing is completed. This change is editorial and provides consistency with the GPUN Organization Plan. This change is not a reduction in prior commitment because the explicit assignment of responsibility for these activities has been increased within the text of this Plan.
15. Section 6.5.2.3(c). The sentence "Ensuring that ...by MCF...performed documented and the results acceptable prior to turnover." now reads "Ensuring that for the work managed and or performed by Site Services ...is..." Refer to item 14 above. As such, this is not a reduction in prior commitment.
16. Section 6.6. The acronym M&TE has been used throughout the text of this section. This is an editorial change which is directed towards improving the clarity of the text of the Plan and as such is to a reduction in prior commitment.
17. Section 6.6.1.1. The phrase "...Such equipment..." has been replaced by "...Such measuring and test equipment..." and the phrase "...Such measures... instruments..." has been replaced by "...Such measures...measuring and test equipment...". This is an editorial change which is directed towards improving the clarity of the text of the Plan by consistently utilizing the same terminology and as such is not a reduction in prior commitment.
18. Section 6.6.1.2(c). The last line previously ended "...for measurements or tests." now it reads "...for measurements or tests until its calibration has been re-established." This is an editorial change which is directed towards improving the clarity of the text of the Plan by reinforcing the requirement not to use M&TE until its acceptability has been definitively determined. As such, this is not a reduction in prior commitment.
19. Section 6.6.1.2(q). The entire paragraph has been changed. It now reads "The calibration status of M&TE which is used for determining the functionality or quality of structures, systems and components within the scope of this Plan shall be maintained." This is an editorial change which is directed towards improving the clarity of the text of the Plan by reinforcing the requirement not to use M&TE without first determining its calibration status. As such, this is not a reduction in prior commitment.
20. Section 6.11.2.1(a). The sentence "Establishing administrative control procedures for..." has been changed to "Establishing procedures for..." Refer to item 13 previously. The term "procedure" in this case is used to indicate technical as well as administrative "procedures". As such, this is not a reduction in prior commitment.

21. Section 7.2.1(c). "10CFR61" has been inserted into the text. This is an editorial change directed to improving the clarify of the text of the Plan by redundantly stating another source of regulatory requirements associated with radioactive waste management. As such, this is not a reduction in prior commitment.
22. Appendix C - Part 2 Reg. Guide 1.8, Rev. 1-4, May 1988. An entire new paragraph has been added to read "for the NRC licensed positions of Reactor Operator (RO) and Senior Reactor Operator (SRO), the experience requirements of ANSI 3.1 - 1981 will be utilized to determine if candidates meet NRC licensing eligibility requirements, until the applicable site's simulator has been certified in accordance with 10CFR50.45.(b). In accordance with NUREG 1262, Questions 100 and 111, GPUN may accept candidates into the RO and SRO training programs who do not meet the detailed guidance contained in ANSI 3.1 - 1981 if GPUN feels that the candidate is capable of performing the job and if those programs utilize a simulator certified in accordance with 10CFR50.45.(b)."

This change is in response to NRC request to directly commit to the ANSI/ANS-3.1-1981. As such, this is not a reduction in prior commitment.

23. Table of Contents. The Table of Contents has been revised as appropriate to show changes in titles of sections or subsections of the Plan (i.e. page 3 and 4). Changes in the page number on which the text for the section begins (i.e. page 4 and 5). If the text of the Plan was simply reset the text on that reset page had been revised then the revision number of that reset page was not changed to reflect the fact that the text had been reset. As such, this is not a reduction in prior commitment.

List of Changes
GPUN Operational QA Plan
Revision 5

1. Appendix C - Part 2 Reg. Guide 1.8, Rev. 1-4, May 1988. In Revision 4, an entire new paragraph had been added which committed to use the experience requirements of ANSI 3.1 - 1981 to determine if candidates meet NRC licensing eligibility requirements, until the applicable site's simulator has been certified in accordance with 10CFR50.45.(b).

Those words relied on reference to NUREG 1262, Questions 100 and 111. In this revision, any reference to NRC Generic Letter 87-16, dated 11/12/87 (NUREG-1262, Questions 100, 103, 104, 111 and 430) has been removed. The text has been modified to be consistent with the requirements of 10CFR55 which rely on both an INPO accredited training program and a NRC certified simulator.

This change is in response to NRC request to directly commit to ANSI/ANS-3.1-1981. As such, this is not a reduction in prior commitment.