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Writer's Direct Dial Number:

C321-94-2074  
May 20, 1994

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station  
Docket No. 50-219  
Technical Specification Change Request (TSCR) No. 215  
Additional Information

The purpose of this correspondence is to provide you with the 10 CFR 50.54 analysis and revised OQA plan pages as detailed in the cover letter for TSCR 215. These enclosures were inadvertently omitted from our original submittal dated April 15, 1994.

If you should have any questions or require further information, please contact Brenda DeMerchant, Oyster Creek Licensing Engineer at (609) 971-4642.

Very truly yours,

John J. Barton  
Vice President & Director  
Oyster Creek

JJB/BDEM:jc  
cc: Administrator, Region 1  
Senior NRC Resident Inspector  
Oyster Creek NRC Project Manager  
TMI-1 Sr. Project Manager

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Subject: 10CFR50.54 Review of Audit  
Related Changes

Date: March 4, 1994

From: S. N. Tiwari - Engineer Sr. I

Location: Morris Corp. Center  
6161-94-034

To: M. W. Laggart - Mgr., Corporate Licensing

A Technical Specification Change Request (TSCR) is being initiated to transfer the frequencies of audits from Plants' Technical Specifications to the GPU Nuclear's Operational Quality Assurance Plan (OQA Plan). The following verbiage changes in the QA Plan have been proposed to facilitate this transfer:

1. 10.2.4                      The areas to be audited are listed in the Nuclear Units' Technical Specification. The frequency of internal audits is based on performance. These frequencies are listed in Appendix E to this Plan.
2. APPENDIX 'C'  
Reg. Guide 1.33, Section 1       The frequency of performance and minimal topical coverage of internal audits will be consistent with Appendix E of this plan.
3. APPENDIX 'C'  
Reg. Guide 1.144, Section  
C.3.a(1) and C.3.a(2)             The frequency of performance and minimal topical coverage of internal audits will be consistent with Appendix E of this plan.

As apparent, the changes revolve around the proposed Appendix E. This appendix is attached as Attachment 1 to this letter. Attachment 2 provides the comparison between proposed and existing audit frequencies.

#### Analysis of Changes and 50.54 Determination

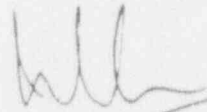
The key elements of this proposed change in OQA Plan constitute of the 2 distinct aspects of proposed Appendix E; one, the Audit Schedule Performance Review, and two, the changed audit frequencies.

A numerical comparison of the existing frequencies prescribed in the Units' Technical Specifications with the proposed frequencies indicates that the frequencies for audits associated with Fire Protection program are not changed. Also not changed are the frequencies mandated by regulations, such as, those for Security Plan and Emergency Plan. Frequencies of other audits have been proposed to be reduced.

If the premise of commitment is the numerical frequency of the audit(s), the proposed numerical reduction in audit frequencies constitute an apparent reduction in GPU Nuclear commitment. It should, however, be noted that this quantitative reduction does not compromise the quality of GPU Nuclear's oversight of its operations. In fact the proposed controls, such as the Audit Schedule Performance Review and the inclusion of Corrective Actions as an item in all audits, enhance the quality of the oversight.

The proposed Audit Schedule Performance Review is the annual review of the performance of the topical area(s) by a group of managers including appropriate plant or corporate management to decide if more frequent audits will be needed. To make this decision, this yearly review will consider such salient performance data as deficiency trends, industry events, notice of violations and licensee event reports. This important database and the conduct and frequency of this review focuses critically on the performance of the area audited and not merely on the prescriptive duration between two audits. This position is consistent with NRC's Regulatory Review Group's (RRG) Recommendations, which among other things, recommends a performance based and graded quality assurance. (Refer to the topical area titled 'Quality Assurance' of the Implementation Plan of SECY-94-003 of January 7, 1994, and associated RRG's recommendation 4.1.1 ). This yearly performance review combined with the inclusion of Corrective Action as an item for all audits is a significant step towards enhancing the efficiency and quality of oversight.

Based on the above analysis, it has been determined that the proposed change constitutes a reduction in commitment, although it improves the quality of oversight.



S. N. Tiwari  
Extension 7433

References:

1. 10CFR50.54
2. NRC SECY 94-003, January 7, 1994, Quality Assurance and associated RRG recommendation 4.1.1

Attachment 1

Operational QA Plan  
Appendix E

<u>TMI Ref.</u>	<u>OC Ref.</u>	<u>Description</u>	<u>Maximum Frequency</u> (See Note 1)
6.5.3.1 (A)	6.5.3.1 (A)	The conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions.	24 Months
6.5.3.1 (B)	6.5.3.1 (B)	The performance, training and qualifications of the entire unit staff.	24 Months
6.5.3.1 (C)	6.5.3.1 (C)	The verification of the nonconformances 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.	24 Months (See Note 2)
6.5.3.1 (D)	6.5.3.1 (G)	The performance of activities required by the Operational Quality Assurance Plan to meet the criteria of Appendix "B", 10CFR50.	36 Months
6.5.3.1 (E)	6.5.3.1 (D)	The Emergency Plan and implementing procedures.	12 Months (Reg. Req'd. Frequency)
6.5.3.1 (F)	6.5.3.1 (E)	The Security Plan and implementing procedures.	12 Months (Reg. Req'd. Frequency)
6.5.3.1 (G)	6.5.3.1 (F)	The Fire Protection Program and implementing procedures	24 Months
6.5.3.1 (H)	6.5.3.1 (I)	The Offsite Dose Calculation Manual and implementing procedures.	36 Months
6.5.3.1 (I)	6.5.3.1 (J)	The Process Control Program and implementing procedures for solidification of radioactive wastes.	24 Months

Attachment 1

Operational QA Plan  
Appendix E

<u>TMI Ref.</u>	<u>OC Ref.</u>	<u>Description</u>	<u>Maximum Frequency</u> (See Note 1)
6.5.3.1 (J)	6.5.3.1 (H)	The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December, 1977.	24 Months
6.5.3.1 (K)	6.5.3.1 (K)	Any other area of unit operation considered appropriate by the IOSRG or the Office of the President-GPUN.	As Requested
6.5.3.2 (A)	6.5.3.2 (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.	12 Months
6.5.3.2 (B)	6.5.3.2 (B)	An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.	36 Months

Note 1: All frequencies except for those at 36 months can be extended for an additional 25% to allow for schedule flexibility. The 25% will not be used on two consecutive audits of the same area.

Note 2: Corrective action will be a standard audit scope item for individual audits throughout the annual audit schedule.

Attachment 2

Comparison of Existing and Proposed Audit Frequencies

<u>TMI</u> <u>Tech. Spec.</u> <u>Ref.</u>	<u>OC</u> <u>Tech. Spec</u> <u>Ref.</u>	<u>Description</u>	<u>Existing</u> <u>Frequency</u>	<u>Proposed Frequency</u> (See Note 1)
6.5.3.1 (A)	6.5.3.1 (A)	The conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions.	12 months	24 Months
6.5.3.1 (B)	6.5.3.1 (B)	The performance, training and qualifications of the entire unit staff.	12 Months	24 Months
6.5.3.1 (C)	6.5.3.1 (C)	The verification of the nonconformances 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.	6 Months	24 Months (See Note 2)
6.5.3.1 (D)	6.5.3.1 (G)	The performance of activities required by the Operational Quality Assurance Plan to meet the criteria of Appendix "B", 10CFR50.	24 Months	36 Months
6.5.3.1 (E)	6.5.3.1 (D)	The Emergency Plan and implementing procedures.	12 months	12 Months (Reg. Req'd.)
6.5.3.1 (F)	6.5.3.1 (E)	The Security Plan and implementing procedures.	12 Months	12 Months (Reg. Req'd.)
6.5.3.1 (G)	6.5.3.1 (F)	The Fire Protection Program and implementing procedures	24 Months	24 Months
6.5.3.1 (H)	6.5.3.1 (I)	The Offsite Dose Calculation Manual and implementing procedures.	24 Months	36 Months

Attachment 2

Comparison of Existing and Proposed Audit Frequencies

<u>TMI</u> <u>Tech. Spec.</u> <u>Ref.</u>	<u>OC</u> <u>Tech. Spec</u> <u>Ref.</u>	<u>Description</u>	<u>Existing</u> <u>Frequency</u>	<u>Proposed Frequency</u> (See Note 1)
6.5.3.1 (I)	6.5.3.1 (J)	The Process Control Program and implementing procedures for solidification of radioactive wastes.	24 Months	24 Months
6.5.3.1 (J)	6.5.3.1 (H)	The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December, 1977.	12 Months	24 Months
6.5.3.1 (K)	6.5.3.1 (K)	Any other area of unit operation considered appropriate by the IOSRG or the Office of the President-GPUN.	As requested	As Requested
6.5.3.2 (A)	6.5.3.2 (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.	12 Months	12 Months
6.5.3.2 (B)	6.5.3.2 (B)	An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.	36 Months	36 Months

Note 1: All frequencies except for those at 36 months can be extended for an additional 25% to allow for schedule flexibility. The 25% will not be used on two consecutive audits of the same area.

Note 2: Corrective action will be a standard audit scope item for individual audits throughout the annual audit schedule.