

JUN 10 1994

DCS

Docket No. 50-219

Mr. J. J. Barton  
Vice President and Director, Oyster Creek  
GPU Nuclear Corporation  
Three Mile Island Nuclear Station  
P. O. Box 480  
Middletown, Pennsylvania 17057-0191

Dear Mr. Barton:

SUBJECT: 10 CFR 50.4(b)(1) TECHNICAL SPECIFICATION  
CHANGE REQUEST NO. 215

References: GPU Nuclear Corporation's letter from Mr. J. J. Barton to U.S.N.R.C., dated  
April 15, 1994.

U.S.N.R.C. Region I QA 94-13, TACS No. U00809.

We received your letter transmitting the Technical Specification Change Request (TSCR)  
No. 215. This change request involves changes to your Operational Quality Assurance plan,  
which is subject to the provisions of 10 CFR 50.54(a).

A review of your submittal has begun; however, we anticipate that this process will take  
more than sixty (60) days. Upon completion, you will be notified of the results.

If you have any questions regarding this review, you may contact Mr. Suresh Chaudhary at  
(610) 337-5335 or Mr. Michael Modes at (610) 337-5198.

Sincerely,

*Original Signed Copy.*

Michael C. Modes, Chief  
Materials Section  
Division of Reactor Safety

940620001B 940610  
PDR ADDCK 05000219  
P PDR

JEH3

Mr. J. J. Barton

2

cc w/encl:

M. Laggart, Manager, Corporate Licensing  
G. Busch, Manager, Site Licensing, Oyster Creek  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
K. Abraham, PAO (2)  
NRC Resident Inspector  
State of New Jersey

bcc w/encl:

Region I Docket Room (with concurrences)  
J. Rogge, DRP  
W. Dean, OEDO  
J. Stolz, NRR/PD 1-4  
A. Dromerick, NRR/PD 1-4  
M. Shannon, NRR/ILPB

RI:DRS  
Chaudhary  
*SKL*  
6/9/94

*W*  
RI:DRS  
Modes  
6/19/94

OFFICIAL RECORD COPY  
A:GPU.QA

Title:	GPUNC Operational Quality Assurance Plan for Three Mile Island Unit 1 and Oyster Creek	Revision No. See Note Below.
Applicability/Scope	This Plan Has GPUNC-Wide Applicability Except TMI-2	Responsible Office 6160
This Document is within QA Scope	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Effective Date See Note Below.
Safety Reviews Required	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

List of Effective Pages on Page 2.0

NOTE: The changes of this revision involve relocation of audit frequencies from Technical Specification to new Appendix E of this Plan. A revision number and effective date are not being provided for this revision pending NRC's approval of the said changes.

	Signature	Concurring Organizational Element	Date
Originator		Director, Quality Assurance	
Concurred By		Dir-Services	
		Dir-Independent Safety Review	
		Dir-Nuclear Assurance	
		Dir-OCNGS	
		Dir-TMI Unit 1	
		Dir-Technical Functions	
Approved By	<i>P.R. Chalk</i>	Office of the President	9/15/90

Title: Organization

Revision No.  
 See Note on Pg. 1

LIST OF EFFECTIVE PAGES

<u>Page No.</u>	<u>Rev. No.</u>	<u>Page No.</u>	<u>Rev. No.</u>	<u>Page No.</u>	<u>Rev. No.</u>	<u>Page No.</u>	<u>Rev. No.</u>
1.0	*	29.0	2	59.0	4	89.0	2
2.0	*	30.0	2	60.0	4	90.0	1
3.0	2	31.0	2	61.0	4	91.0	1
4.0	4	32.0	4	62.0	4	92.0	2
5.0	4	33.0	2	63.0	2	93.0	2
6.0	6	34.0	4	64.0	4	94.0	*
7.0	2	35.0	2	65.0	4	95.0	1
8.0	4	36.0	2	66.0	2	96.0	2
9.0	4	37.0	2	67.0	2	97.0	2
10.0	4	38.0	2	68.0	4	98.0	2
11.0	2	39.0	4	69.0	4	99.0	2
12.0	4	40.0	2	70.0	4	100.0	2
13.0	4	41.0	2	71.0	1	101.0	1
14.0	4	42.0	2	72.0	1	102.0	1
15.0	4	43.0	2	73.0	6	103.0	1
16.0	4	44.0	4	74.0	6	104.0	1
17.0	4	45.0	4	75.0	6	105.0	1
18.0	4	46.0	4	76.0	2	106.0	2
19.0	4	47.0	2	77.0	2	107.0	2
20.0	4	48.0	4	78.0	4	108.0	*
21.0	4	49.0	2	79.0	2	109.0	2
22.0	4	50.0	2	80.0	2	110.0	2
23.0	4	51.0	4	81.0	4	111.0	2
24.0	4	52.0	4	82.0	2	112.0	2
25.0	4	53.0	4	83.0	2	113.0	2
26.0	4	54.0	2	84.0	*	114.0	2
27.0	4	55.0	4	85.0	4	115.0	*
28.0	4	56.0	4	86.0	1	116.0	*
29.0	4	57.0	4	87.0	2		
30.0	4	58.0	4	88.0	2		

\* See Note on Page 1.

Title: 10.0 Audits

Revision No.

See Note on Pg. 1

- c. Procedure(s) for the scheduling, preparation, performance, reporting of the results of audits, and distribution to appropriate levels of management.
  - d. Periodic analysis of audit results and the reporting of such results to appropriate levels of management.
  - e. Follow-up action to be taken based upon individual and collective audit results.
- 10.2.4 The areas to be audited are listed in the Nuclear Units' Technical Specifications. The frequencies of internal audits are based on performance and are listed in Appendix E of this plan. Annual review of these frequencies shall be conducted. This review shall examine the appropriateness of the prescribed audit frequency by considering performance factors such as deficiency trends, assessment results, etc. and shall determine if more frequent audit is needed of the topical area(s).
- 10.2.5 The frequency of conducting external audits of selected suppliers of technical support, environmental monitoring, radwaste shipping, computer, radioanalytical, and engineering services shall be scheduled once within the life of the activity or every three years depending on the duration of the contractual relationship.
- 10.2.6 Each audit shall be led by a GPUN certified lead auditor. Audit team members shall be utilized as required and will be classified as either auditors or technical specialists, depending on their function on the audit team.
- 10.2.7 Those GPUN and external organizations providing items and/or conducting activities within the scope of this Plan are subject to audit consistent with the requirements of this Plan.
- 10.2.8 Audits shall be performed in accordance with pre-established written procedures or checklists. The personnel utilized to perform on an audit shall not have any responsibility for the activity audited.
- 10.2.9 Audits shall consist of reviews of approved documents and records and observation(s) of selected activities in sufficient detail to determine the appropriateness of the documents for use, effectiveness of implementation and the effectiveness of actions taken to correct previous nonconformances.
- 10.2.10 Audited organizations shall provide sufficient support to assure the accuracy of the audit results, review and response to audit nonconformances, and effective resolution/prevention of deficiencies. The corrective actions required to resolve adverse audit findings shall be defined and implemented in a timely manner.
- 10.2.11 Audit finding nonconformances shall be followed up in a timely manner. Such adverse audit findings shall typically not be closed until the effective implementation of corrective action(s) is verified.
- 10.2.12 Sufficient records shall be generated and maintained to provide documentation of audit system scope of coverage, individual audit coverage (i.e., audit plans, checklists, or equivalent), audit reports, lead auditor certifications, followup and verification and results of periodic analysis of audit results.

Title: Appendices

Revision No.  
See Note on Pg. 1

## APPENDIX C - PART 2

2. Additions to existing plant systems will be made to the same code, standard and technical requirements which were originally applied to the system to which the addition is to be made or more recent versions of these codes, standards and technical requirements. The addition will not degrade the safety of the system being added to.
3. For new construction, the latest applicable code will be utilized unless such utilization would result in hardship or unusual difficulty without providing an equivalent level of safety.

NRC Regulatory Guide 1.30, August 1972Quality Assurance Requirements for the Installation, Inspection and Testing of Instrumentation and Electric Equipment

GPUN shall comply with the Regulatory Position established in this Regulatory Guide in that QA programmatic/administrative requirements included therein shall apply to maintenance and modification activities even though such requirements were not in effect originally. Technical requirements associated with maintenance and modifications shall be the original technical requirements or better (e.g., code requirements, material properties, design margins, manufacturing processes, and inspection requirements).

Sections 5.2 and 6.2 of ANSI N45.2.4 list tests which are to be conducted during the construction phase. In lieu of this, GPUN utilizes its Engineering and/or Maintenance organizations to establish the need for specific tests or test procedures during the operational phase.

NRC Regulatory Guide 1.33, Rev. 2, February 1978Quality Assurance Program Requirements (Operation)

The GPUN QA Program complies with the regulatory position of this guide with the following clarifications:

1. Regulatory Position C.4 of the regulatory guide

The frequency of performance and minimal topical coverage of internal audits will be consistent with Appendix E of this plan.

Title: Appendices

 Revision No.  
 See Note on Po. 1

## APPENDIX C - PART 2

4. Hose may be used in lieu of pipe where the connections are temporary. The anticipated applications of hose would normally be (1) connections to contractor owned skid mounted radioactive waste processing equipment, (2) connections to a nonmounted, frequently-changed component such as a burial liner/HIC or (3) connections to nonmounted pieces of radioactive waste processing or collection equipment which must be readily removeable (e.g., items placed on equipment hatches). The pressure rating of such hoses and connections shall equal or exceed those of the system(s) or component(s) to which they are connected.

Prior to use, the hoses shall be hydrotested to the appropriate pressure for the system or component to which they are connected. After installation, they are to receive regular hydrotesting or inservice inspections.

A safety evaluation is required to justify the use of such hose connections.

NRC Regulatory Guide 1.144, January 1979

Audits of Quality Assurance Programs for Nuclear Power Plants

GPUN is in basic agreement with the position set forth in the Regulatory Guide subject to the following comments:

1. Sections 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.

2. Section C.3.b(1). Source surveillance will be utilized in lieu of or in addition to receipt inspection. As permitted, external audits of such procurement actions will typically not be scheduled.

3. Section C.3.b(2)

External audits of selected suppliers of services which are within the scope of this Plan will be scheduled and conducted at least once within the life of the activity or every three years. Refer also to 10.2.3 of this plan.

An annual evaluation of suppliers of items, parts, materials and services will be conducted. These evaluations will be conducted utilizing the results of source surveillance, source inspection, receipt inspection and/or audits; and, other factors. These evaluations will determine the need to conduct audits of suppliers of items, parts or materials; or, increase the frequency of conducting audits of suppliers of services.

Title: Appendices

 Revision No.  
 See Note on Pg. 1

## 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



Title: Appendices

Revision No.  
 See Note on Pg. 1

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 that are regulatory required or listed as 36 months, can be extended for an additional 25% to allow for schedule flexibility. If the 25% extension or a portion thereof has been used for an audit, the scheduled interval for the second audit will start at the actual end-date of the 1st audit. 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 all individual audits.

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

Comparision 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.



GPU Nuclear Corporation  
Post Office Box 388  
Route 9 South  
Forked River, New Jersey 08731-0388  
609 971-4000  
Writer's Direct Dial Number:

C321-94-2042  
April 15, 1994

JUN - 1 RECD M<sup>2</sup>

QA 94-13

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

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)  
Docket No. 50-219  
Technical Specification Change Request (TSCR) No. 215 -  
QA Audit Frequencies

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request (TSCR) No. 215.

Also enclosed is a Certificate of Service for this request certifying service to the chief executives of the township and county in which the facility is located, as well as the designated official of the State of New Jersey Bureau of Nuclear Engineering.

The purpose of this TSCR is to request the deletion of the audit program frequency requirements from Technical Specification 6.5.3 and to utilize the Operational Quality Assurance (OQA) Plan as the controlling document. This change will introduce more flexibility into audit scheduling to consider plant activities and performance. In addition, a minor editorial change has been incorporated into this TSCR correcting a reference in TS 6.5.1.14 in response to a finding in the Operational Safety Team Inspection report of December 23, 1993.

The OQA Plan is part of GPU Nuclear's Safety Analysis Report (SAR) and subject to the provisions of 10 CFR 50.54(a). A formal review of the changes was conducted considering the requirements of 10 CFR 50.54(a). The review concluded that measures being introduced enhance the overall program.

9401290033 14 pp.

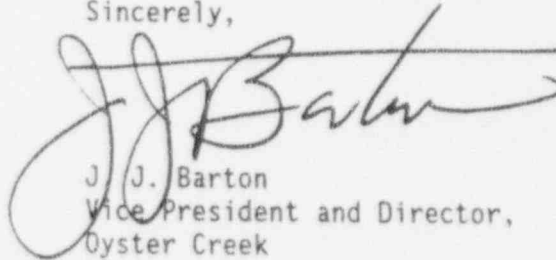


However, in a quantitative sense, the changes represent a reduction in commitment. Therefore, the changes to the OQA Plan are being submitted with this TSCR for review and approval. The 10 CFR 50.54(a) analysis and the revised OQA Plan pages are attached. Furthermore, since the OQA Plan applies equally to Three Mile Island Nuclear Station, a TSCR to Operating License No. DPR-50 is being submitted concurrently. If the amendments are approved, GPU Nuclear will submit similar changes to the TMI Unit 2 Technical Specifications and the PDMS QA Plan.

GPU Nuclear considers this TSCR to be a Cost Beneficial Licensing Action (CBLA). It is estimated that implementation of this change could result in a savings of \$860,000 for the duration of the current license.

Pursuant to 10 CFR 50.91(a)(1), enclosed is an analysis applying the standards in 10 CFR 50.92 to make a determination of no significant hazards consideration.

Sincerely,



J. J. Barton  
Vice President and Director,  
Oyster Creek

JJB\DK\plp  
Attachments

cc: Administrator, Region 1  
Oyster Creek NRC Project Manager ✓  
Sr. Resident Inspector  
TMI-1 Senior Project Manager



**GPU Nuclear Corporation**  
Post Office Box 388  
Route 9 South  
Forked River, New Jersey, 08731-0388  
609 971-4000  
Writer's Direct Dial Number:

C321-94-2042  
April 15, 1994

Mr. Kent Tosch, Director  
Bureau of Nuclear Engineering  
Department of Environmental Protection  
CN 411  
Trenton, NJ 08625

Dear Mr. Tosch:

Subject: Oyster Creek Nuclear Generating Station  
Facility Operating License No. DPR-16  
Technical Specification Change Request No. 215

Pursuant to 10 CFR 50.91(b)(1), please find enclosed a copy of the subject document which was filed with the United States Nuclear Regulatory Commission on April 15, 1994.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. J. Barton', written over a circular stamp or mark.

J. J. Barton  
Vice President and Director  
Oyster Creek

Attachment  
JJB/DK/plp



**GPU Nuclear Corporation**  
Post Office Box 388  
Route 9 South  
Forked River, New Jersey 08731-0388  
609 971-4000  
Writer's Direct Dial Number:

C321-94-2042

April 15, 1994

The Honorable Theodore J. Hutler  
Mayor of Lacey Township  
818 West Lacey Road  
Forked River, NJ 08731

Dear Mayor Hutler:

Enclosed herewith is one copy of Technical Specification Change Request No. 215 for the Oyster Creek Nuclear Generating Station Operating License.

This document was filed with the United States Nuclear Regulatory Commission on April 15 1994.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'J. J. Barton', written over the typed name and title.

J. J. Barton  
Vice President and Director  
Oyster Creek

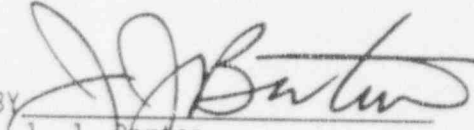
Attachment  
JJB/DK/plp

GPU NUCLEAR CORPORATION  
OYSTER CREEK NUCLEAR GENERATING STATION

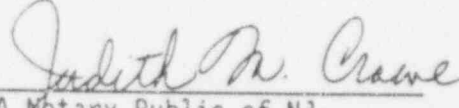
Facility Operating  
License No. DPR-16

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Technical Specification Change Request  
Request No. 215  
Docket No. 50-219  
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Applicant submits, by this Technical Specification Change Request No. 215 to the Oyster Creek Nuclear Generating Station Operating License, a change to pages 6-5, 5-7.

BY   
J. J. Barton  
Vice President and Director  
Oyster Creek

Sworn and Subscribed to before me this 15<sup>th</sup> day of April 1994.

  
A Notary Public of NJ

JUDITH M. CROWE  
Notary Public of New Jersey  
My Commission Expires 12/31/95

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
GPU Nuclear Corporation )

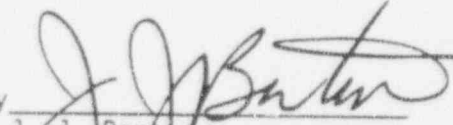
Docket No. 50-219  
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CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 215 for Oyster Creek Nuclear Generating Station Operating License, filed with the U.S. Nuclear Regulatory Commission on April 15 1994 has this day of 4/15, 1994, been served on the Mayor of Lacey Township, Ocean County, New Jersey by deposit in the United States mail, addressed as follows: 00  
11C

The Honorable Louis A. Amato  
Mayor of Lacey Township  
818 West Lacey Road  
Forked River, NJ 08731

By

  
J. J. Barton  
Vice President and Director  
Oyster Creek

## I. Technical Specification Change Request (TSCR) No. 215

GPU Nuclear requests that the following changed replacement pages be inserted into existing Technical Specifications:

Delete the existing pages 6-5 and 6-7 and replace it with the attached revised pages 6-5 and 6-7.

## II. Reasons for Change

Section 6.5.3 of the Technical Specifications contains the audit program requirements. Areas to be audited and audit frequencies are specified. Because these requirements are in the Technical Specifications, there is little flexibility to adjust the audit program to make the audits more meaningful. Audits are required to be performed regardless of activities in progress. For example, the audit of processing and packaging of radioactive waste is required when due even if minimal processing and packaging is being performed then and considerable processing and packaging will be performed the following month. Some activities are conducted only during refueling outages, so it is sensible to audit those activities during refueling outages rather than ongoing activities according to a non-flexible schedule. The Technical Specifications do not preclude adding an extra audit to cover an activity during a refueling outage, but it does prevent delaying an audit to either catch or avoid a refueling outage. Similarly, the limited flexibility can lead to auditing an activity prior to corrective action completion when the audit could have assessed the effectiveness of the corrective action if it were postponed a short time. Furthermore, the current audit program requirements can consume resources for auditing areas without problems which would be better used in monitoring and assessing weak areas or areas of decreasing performance before they become weak areas.

The proposed Technical Specification change deletes the audit program frequency requirements from the Technical Specifications and relocates them to the Operational Quality Assurance (OQA) Plan. In addition, the maximum interval for some audit frequencies are being increased. The change to the OQA Plan is being pursued concurrently.

This TSCR also includes a change in TS 6.5.1.14 correcting a reference to a standard. This change is being made to address a finding in the Operational Safety Team Inspection report of December 23, 1993.

## III. Safety Evaluation Justifying Change

The proposed change concerns audit frequency requirements. A fixed, inflexible schedule of audit requirements is being replaced with a more flexible scheduling mechanism. The areas and activities to be audited and the scope of the audits performed are unaffected by this change. In lieu of a prescriptive, unchangeable

schedule, audits will be conducted within relatively flexible parameters based on the performance of the subject area. In this way resources can be focused on weak areas and areas of declining performance. Within these parameters, areas with consistently high performance can be audited less frequently.

The maximum interval between audits for four of the thirteen subject areas has been extended to twenty-four (24) months. In two other cases the maximum interval has been extended to thirty-six months. For those areas with a nominal twenty-four (24) month interval, a six month grace period will be introduced. No grace period will be permitted for those areas with a maximum interval of thirty-six (36) months. Each audit will consider the nonconformance and corrective action system in addition to the subject area audit that will be done on a twenty four (24) month basis. Furthermore, each subject area, regardless of interval, will be reviewed on an annual basis to determine when the next audit should be conducted. Recent performance as evidenced by any Notices of Violation (NOV), Licensee Event Report (LER), assessment results by independent groups, self assessment activities and deficiency trending data will be key factors in this review. These factors and others will constitute an assessment of the performance of each area to substantiate the projected audit schedule or determine the need to modify it. In this manner the overall quality of the audit program is enhanced.

There are several activities for which the audit frequency is mandated by regulation. For those activities GPU Nuclear will continue to meet the specified schedule unless a specific exemption is sought and granted.

The OQA Plan is part of GPU Nuclear's Safety Analysis Report (SAR) and subject to the provisions of 10 CFR 50.54(a). A formal review of the changes was conducted considering the requirements of 10 CFR 50.54(a). The review concluded that the additional measures being introduced enhance the overall program. However, in a quantitative sense, the changes represent a reduction in commitment. Therefore, the revisions to the OQA Plan are being submitted to the NRC concurrently with this TSCR.

#### IV. No Significant Hazards Consideration

GPU Nuclear has determined that this TSCR poses no significant hazard as defined by the NRC in 10 CFR 50.92.

1. These changes do not affect the function of any system or component. Therefore, they do not increase the probability of occurrence or consequence of an accident previously evaluated in the SAR.
2. These changes do not involve a physical change to plant configuration and they do not affect the performance of any equipment. Therefore, they do not create the possibility of an accident or malfunction of a different type than previously identified.

3. The shifting of the audit frequency requirements from the Technical Specifications to the OQA Plan and the extension of the maximum interval between audits of certain areas do not change the activities to be audited nor the scope of individual audits. Furthermore, audit frequencies are not associated with the margin of safety in the bases of any Technical Specification. Therefore, the margin of safety is not affected by this change.

V. Implementation

It is requested that the amendment authorizing this change be effective 30 days after issuance to allow changes in procedures to be made.



### 6.5.3 AUDITS

6.5.3.1 Audits of facility activities shall be performed in accordance with the Oyster Creek Operational Quality Assurance Plan. These audits shall encompass:

- a. The conformance of facility operations to provisions contained within the Technical Specifications and applicable license conditions.
- b. The performance, training and qualifications of the facility staff.
- c. The results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or method of operation that affect nuclear safety.
- d. The Facility Emergency Plan and implementing procedures.
- e. The Facility Security Plan and implementing procedures.
- f. The Fire Protection Program and implementing procedures.
- g. The performance of activities required by the Operational Quality Assurance Plan to meet the criteria of Appendix 'B', 10 CFR 50.
- h. The radiological environmental monitoring program and the results thereof.
- i. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures.
- j. The PROCESS CONTROL PROGRAM and implementing procedures for radioactive wastes.
- k. Any other area of facility 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

6.5.1.13 Written records of activities performed under specifications 6.5.1.1 through 6.5.1.11 shall be maintained.

## QUALIFICATIONS

6.5.1.14 Responsible Technical Reviewers shall meet or exceed the qualifications of ANSI/ANS 3.1-1978 Section 4.6 or 4.4 for applicable disciplines or have 7 years of appropriate experience in the field of his specialty. Credit towards experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years. These Reviewers shall be designated in writing.

## 6.5.2 INDEPENDENT SAFETY REVIEW

### FUNCTION

6.5.2.1 The Vice President of each division within GPU Nuclear Corporation as indicated in Figure 6.2.1 shall be responsible for ensuring the periodic independent safety review of the subjects described in 6.5.2.5 within his assigned area of safety review responsibility, as assigned in the GPUN Review and Approval Matrix.

6.5.2.2 Independent safety review shall be completed by an individual/group not having direct responsibility for the performance of the activities under review, but who may be from the same functionally cognizant organization as the individual/group performing the original work.

6.5.2.3 GPU Nuclear Corporation shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:

- a. Nuclear power plant operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Nondestructive testing
- f. Instrumentation and control
- g. Radiological safety
- h. Mechanical engineering
- i. Electrical engineering
- j. Administrative controls and quality assurance practices
- k. Emergency plans and related organization, procedures and equipment
- l. Other appropriate fields associated with the unique characteristics of Oyster Creek

6.5.2.4 Consultants may be utilized as determined by the cognizant Vice President to provide expert advice.