

JUN 10 1994

Docket No. 50-289

Mr. T. Gary Broughton
Vice President and Director, TMI
GPU Nuclear Corporation
Three Mile Island Nuclear Station
P. O. Box 480
Middletown, Pennsylvania 17057-0191

Dear Mr. Broughton:

SUBJECT: 10 CFR 50.4(b)(1) TECHNICAL SPECIFICATION CHANGE
REQUEST NO. 237

References: GPU Nuclear Corporation letter from Mr. T. G. Broughton, to U.S.N.R.C.,
dated April 19, 1994.

U.S.N.R.C. Region I QA 94-14, TACS No. U00810.

We received your letter transmitting the Technical Specification Change Request (TSCR) No. 237. 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, please contact Mr. Suresh Chaudhary at (610) 337-5335 or Mr. Michael Modes at (610) 337-5198.

Sincerely,

Original Signed PDR

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

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P PDR

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Mr. T. Gary Broughton

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JUN 10 1994

cc:

M. J. Ross, Director, Operations and Maintenance
J. C. Fornicola, Director, Licensing and Regulatory Affairs
J. S. Wetmore, Manager, TMI Licensing Department
E. L. Blake, Shaw, Pittman, Potts and Trowbridge (Legal Counsel for GPUN)
TMI-Alert (TMIA)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

bcc:

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

RI:DRS
Chaudhary
SAC

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Modes

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A:TMII.QA



GPU Nuclear Corporation
Route 441 South
P.O. Box 480
Middletown, Pennsylvania 17057-0480
(717) 944-7621
Writer's Direct Dial Number:
(717) 948-8005

April 19, 1994
C311-94-2031

JUN - 1 REC'D MZ
QA 94-14

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

Dear Sir:

Subject: Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request (TSCR) No. 237
QA Audit Frequencies

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request No. 237.

Also enclosed is the 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 Commonwealth of Pennsylvania, Bureau of Radiation Protection.

The purpose of this TSCR is to request the deletion of the audit program frequency requirements from the Technical Specifications and to utilize the Operational Quality Assurance (OQA) Plan as the controlling document. This change will introduce flexibility into audit scheduling to consider plant activities and performance.

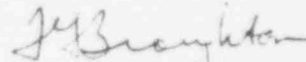
The OQA Plan is part of GPU Nuclear's Safety Analysis Report (SAR) and subject to the provisions of 10 CFR 50.54(a). A formal review of the changes was conducted considering the requirements of 10 CFR 50.54(a). The review concluded that measures being introduced enhance the overall program. However, 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 the Oyster Creek Nuclear Generating Station, a TSCR to Operating License No. DPR-16 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 \$1.15 million for the duration of the current license.

9404200137-2100

Pursuant to 10 CFR 50.51(a)(1), enclosed is our analysis, applying the standards in 10 CFR 50.92 to make a determination of no significant hazards considerations. As stated above, pursuant to 10 CFR 50.91(a), we have provided a copy of this letter, the proposed change in Technical Specifications, and our analyses of significant hazards considerations to Robert Barkanic, the designated representative of the Commonwealth of Pennsylvania.

Sincerely,



T. G. Broughton
Vice President and Director, TMI

DK/plp

Attachments

cc: Administrator, Region I
TMI Senior Resident Inspector
TMI-1 Senior Project Manager

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER AND LIGHT COMPANY
AND

PENNSYLVANIA ELECTRIC COMPANY
THREE MILE ISLAND NUCLEAR STATION, UNIT 1

Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request No. 237

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF DAUPHIN) SS:
)

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1. As part of this request, proposed replacement pages for Appendix A are also included.

GPU NUCLEAR CORPORATION

BY: *J. B. Brangher*
Vice President and Director, TMI

Sworn and subscribed before me this
19th day of April, 1994.

Melody Kim Kulp
Notary Public

Notarial Seal
Melody Kim Kulp, Notary Public
Londonderry Twp., Dauphin County
My Commission Expires Aug. 21, 1997
Member, Pennsylvania Association of Notaries

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
GPU NUCLEAR CORPORATION

DOCKET NO. 50-289
LICENSE NO. DPR-50

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 237 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 1, has, on the date given below, been filed with executives of Londonderry Township, Dauphin County, Pennsylvania; Dauphin County, Pennsylvania; and the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection, by deposit in the United States mail, addressed as follows:

Mr. Daryl LeHew, Chairman
Board Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, PA 17057

Mr. Russel L. Sheaffer, Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Courthouse
Harrisburg, PA 17120

Director, Bureau of Radiation Protection
Attn: Mr. Robert Barkanic
Pa Dept. of Environmental Resources
P. O. Box 2063
Harrisburg, PA 17120

GPU NUCLEAR CORPORATION

BY: J. J. Braughton
Vice President and Director, TMI

DATE: April 19, 1994

I. Technical Specification Change Request (TSCR) No. 237

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

Delete the existing pages 6-7 and 6-8 and replace them with the attached revised pages 6-7 and 6-8.

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 the month it is due 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. This change to the OQA Plan is being pursued concurrently.

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. Areas with consistently high performance can be audited less frequently while still within the parameters.

The maximum interval between audits for four of the thirteen subject areas has been extended to twenty-four (24) months and in two other cases the maximum interval has been extended to thirty-six (36) 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 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 Reports (LER), assessment results by independent parties, 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 and substantiate the projected audit schedule or determine the need to modify it. In this manner the overall quality of the audit program will be 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 proposed changes was made considering the requirements of 10 CFR 50.54(a). That review concluded that the additional measures being introduced enhance the overall program. However, the changes represent a reduction of commitment in a quantitative sense. 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.

- 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.

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. Clark</i>	Office of the President	9/15/9

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>
10	*	59	4	89	*	10	*
11	*	60	4	90	*	11	*
12	*	61	4	91	*	12	*
13	*	62	4	92	*	13	*
14	*	63	2	93	*	14	*
15	*	64	4	94	*	15	*
16	*	65	4	95	*	16	*
17	*	66	2	96	*	17	*
18	*	67	2	97	*	18	*
19	*	68	4	98	*	19	*
20	*	69	4	99	*	20	*
21	*	70	4	100	*	21	*
22	*	71	1	101	*	22	*
23	*	72	1	102	*	23	*
24	*	73	6	103	*	24	*
25	*	74	6	104	*	25	*
26	*	75	6	105	*	26	*
27	*	76	2	106	*	27	*
28	*	77	2	107	*	28	*
29	*	78	4	108	*	29	*
30	*	79	2	109	*	30	*
31	*	80	2	110	*	31	*
32	*	81	4	111	*	32	*
33	*	82	4	112	*	33	*
34	*	83	4	113	*	34	*
35	*	84	4	114	*	35	*
36	*	85	4	115	*	36	*
37	*	86	4	116	*	37	*
38	*	87	4	117	*	38	*
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115	*	164	4	194	*	115	*
116	*	165	4	195	*	116	*
117	*	166	4	196	*	117	*
118	*	167	4	197	*	118	*
119	*	168	4	198	*	119	*
120	*	169	4	199	*	120	*
121	*	170	4	200	*	121	*

* 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 5.1 and 6.2 of ANSI N45.1.4 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 Pg. 1

APPENDIX C - PART 2

1. Hoses sh. 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 shal. 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

Auditing 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 10.2.6 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

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.