## Jersey Central Power & Light Company



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General Public Utilities Corporation\_\_\_\_

January 18, 1974

Mr. John G. Davis
Deputy Director for Field Operations
Directorate of Regulatory Operations
United States Atomic Energy Commission
Washington, D. C. 20545

Dear Mr. Davis:

Your letter of December 18, 1973 summarized our early November meeting at which the topics noted below were discussed. In order to facilitate an evaluation of our corrective action, we are pleased to provide pertinent information on these topics.

## Organizational Changes

The present Oyster Creek Nuclear Generating Station's staff organization is shown on Figure 1. The station administrative procedures will set forth functions and responsibilities for key positions in this new organization. These descriptions are currently being revised and will be available within thirty days. All key supervisory positions are presently filled with amply qualified personnel. Recent staff promotions have resulted in filling the Chief Engineer's and Operations Engineer's positions. The former Assistant Station Superintendent position is now identified by the title of Chief Engineer.

The Radiation Protection Supervisor's position has been filled as well as an additional Radiation Protection Foreman from the outside. The Radiation Protection Supervisor, in addition to his normal responsibilities, also attends all PORC meetings. In addition, a promotion from within the plant staff now provides a total of three Radiation Protection Foremen. Also, two General Foremen, along with several Station Helpers, have been assigned to the Radiation Protection Supervisor to provide clean-up/housekeeping capabilities within this group.

As seen on Figure 1, several engineers have been assigned to each of the key supervisors to provide technical expertise to prepare procedures, investigate plant problems, and follow up on associated corrective actions.

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A plant Staff Engineer has been assigned the specific responsibility for the implementation of the Oyster Creek Environmental Program. He is assisted by an Engineering Assistant and reports to the station's Technical Engineer. Finally, to ensure proper follow up of commitments as well as providing additional auditing of plant operations, two Staff Operations Engineers and an Engineering Assistant have been assigned to the Manager, Nuclear Generating Stations.

The GPU Service Corporation has always provided assistance to the Oyster Creek Station. This has been chiefly in the form of Safety and Licensing and Nuclear Fuels areas. Recent changes, however, now provide, via the Jersey Central Power & Light Company's Generation Engineering Manager, access to the various engineering support disciplines available in this organization. A GPU Service Corporation Project Manager has been assigned full time to the Oyster Creek project to coordinate the many supporting activities. Specific engineering tasks have been assigned to GPU Engineering so as to permit the Jersey Central Generation Engineering group to devote more time to procedure preparation. Typical of these engineering tasks is the design and construction of new liquid, solid, and gaseous waste treatment facilities as well as numerous other short-term engineering projects.

## Quality Assurance Program for Operations

Recognizing that an Operational Quality Assurance Program is important and should be established at the earliest date, Jersey Central Power & Light Company is presently establishing a program which reflects both the urgency and expanded requirements being placed on utility operational quality assurance programs today.

In light of the above, the following accomplishments have been achieved:

- Jersey Central Power & Light Company has submitted, on December 19, 1973, Revision No. 1 to Amendment 71 of the FSAR which supersedes the original Amendment 71 and revises the Operational Quality Assurance Plan in accordance with present AEC Guidelines.
- 2. Jersey Central Power & Light Company has expanded its Operational Quality Assurance Organization to eighteen employees (six Jersey Central Power & Light Company employees and twelve non-Jersey Central Power & Light Company employees) as shown on the enclosed organization chart. NUS and GPU Service Corporation are providing assistance in developing the initial procedures which will be used to implement the Quality Assurance Program. United Testing Lab personnel are being used to provide augmented, temporary audit and surveillance functions at the Oyster Creek site.
- Jersey Central Power & Light Company has employed its expanded Operational Quality Assurance Organization to:

- (a) Write, review, approve, and issue Quality Assurance Procedures, and
- (b) implement, audit, and surveil approved procedures.

As each procedure is completed and approved, it is being issued for implementation with the intention of having completed and issued the initial set of procedures during April of 1974. As experience or continuing review dictates, procedures will be revised or changed to improve the Operational Quality Assurance Program. It is the intention of Jersey Central Power & Light Company to establish a dynamic Operational Quality Assurance Program which will be responsive to both the needs of Jersey Central Power & Light Company and the developments which are a result of industry experience.

## Environmental Affairs Department

Jersey Central Power & Light Company, as a member of the community and a user of natural resources, is deeply concerned with the conservation and improvement of the environment. Jersey Central Power & Light Company seeks to meet the electrical power requirements of its customers as economically as possible, consistent with intelligent use of the environment, and with due consideration not only for present power needs but also for the requirements of future generations.

To achieve this, it is Jersey Central Power & Light Company's policy to conform fully with all applicable environmental quality regulations and, to the maximum feasible and desirable extent, to provide aesthetically pleasing facilities, to coordinate generation, transmission, distribution, and other facilities with the expressed desires of the affected local communities. The direction and coordination necessary to assure implementation of these policies is the responsibility of the Environmental Affairs Department. An organization chart is attached as Figure 3.

The following is a list of the department's specific responsibilities:

- Provide written procedures, concerning environmental considerations, to be used in the planning for the construction of new facilities and the modification of existing facilities for company directed projects and provide a documentation system to assure that various subjects have been reviewed during the planning process.
- Coordinate the preparation and submission of applications to appropriate agencies for all environmentally oriented permits required for company directed projects. Review applications prepared by other departments having environmental or public safety implications that must be submitted to local, state, and federal agencies.
- Assure that all existing facilities are being operated in accordance with pollution control and abatement regulations

corrective items and schedule accomplishment. in engineering and operating personnel. Corporation's policy. Corporation's Environmental Coordinator. on the status of the Environmental Program. sponsored environmental committees.

or applicable variances, and that all permits, licenses, and variances are up-to-date for existing facilities that are operating under variances, identify the corrective action necessary to achieve compliance, assign priorities to

- 4. Coordinate the procurement of environmental monitoring equipment.
- 5. Accept, review, and initiate necessary action on all environmental complaints, citations, and regulatory orders.
- Conduct programs designed to instill "environmental awareness"
- 7. Insure that capital and operating cost records for all environmental equipment are maintained in accordance with GPU Service
- Prepare comments on legislative and regulatory proposals when such action is indicated by state or local considerations. This will be done in consultation with the GPU Service
- Maintain continuing contact with the GPU Service Corporation's Environmental Affairs Department via the GPU Service Corporation's Environmental Coordinator. Prepare and submit quarterly reports
- 10. Coordinate contacts with environmental organizations and industry
- 11. Initiate and perform special surveillance, research, and study activities in the areas of environmental concern, evaluating their impact and reporting to regulatory groups where required.
- Audit the implementation of Environmental Technical Specifications of nuclear generating facilities and the operational environmental effects of fossil fueled generating stations, substations, transmission and distribution facilities, as well as other facets of Jersey Central Power & Light Company's operations.

Please advise me should you require any additional information.

Sincerely,

Shepard Bartnoff Shepard Bartnoff

President

ORGANIZATION CHART

FIGURE 1

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Figure 2 Organizational Chart Operational Quality Assurance

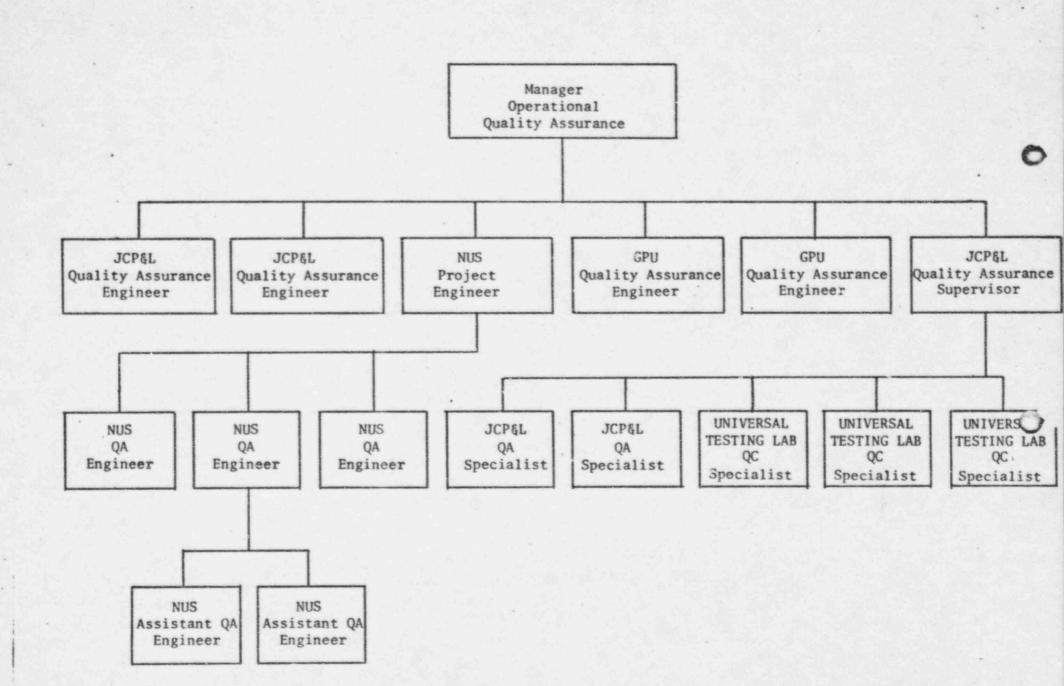
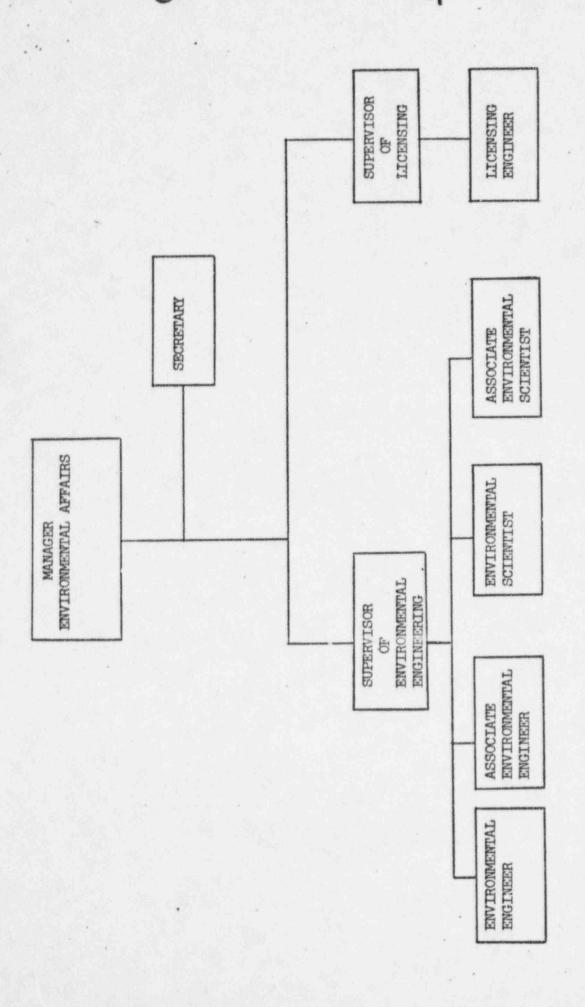


Figure 3
ORGANIZATION CHART
ENVIRONMENTAL AFFAIRS DEPARTMENT



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