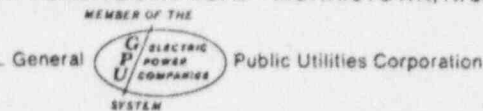


Jersey Central Power & Light Company



MADISON AVENUE AT PUNCH BOWL ROAD • MORRISTOWN, N. J. 07960 • 201-539-6111



75-07

November 5, 1975

Mr. John G. Davis, Acting Director
Division of Field Operations
Office of Inspection and Enforcement
United States Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Davis:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
NRC Inspection--March 10-14, 1975

This is in response to your letter dated October 17, 1975, which addresses the NRC inspection of our Oyster Creek Nuclear Generating Station on March 10-14, 1975.

Both the utility industry and the Nuclear Regulatory Commission have been maturing at a rapid pace in the area of formal, documented operational quality assurance. It was less than three years ago when we were both trying to apply 10CFR50 Appendix B to an operational nuclear power plant, and we entered the period of endorsing construction standards for operation. During this period of rapid change, JCP&L was developing its Operational Quality Assurance Plan and Procedures in a manner which would meet the intent of the escalating volume of guidance being provided. At the end of 1974 and the beginning of 1975, JCP&L was completing its first set of comprehensive procedures which it felt would meet that guidance.

Your March 1975 inspection was conducted at a major transition point where JCP&L was upgrading various areas of our formal Quality Assurance Program, such as: maintenance control and documentation, and design control and documentation. As a result of this fact, some of your inspection efforts addressed outdated systems. This is not to imply that our program upgrading was complete at or during the period of your inspection.

JCP&L is continuing the Quality Assurance Program upgrading at this time. We have established a formal schedule and definition of objectives. These were presented to Mr. O'Reilly and members of his staff

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on September 9, 1975 by myself, the Vice President-Generation, and the Manager-Operational Quality Assurance. The document which was presented and discussed at that meeting is available for use by your inspectors at Oyster Creek. In response to your request for schedules and implementation dates of specific items, I refer your inspectors to that document. Since this is an upgrading program and various items require differing efforts and time frames, specific items will be completed at different times.

In order to accomplish the upgrading effort in a timely manner, JCP&L has taken two specific actions. We have significantly increased the size of our Plant Operational, Generation Engineering, and Quality Assurance staffs to provide an additional emphasis on program upgrading. In addition, JCP&L is utilizing a consulting organization to augment its staff. At this time, the firm is providing ten full-time personnel and numerous part-time personnel who are assisting in all areas of the program.

The "WASH" documents to which you refer have been the subject of a major effort. JCP&L has generated checklists for the three documents and has audited our entire program to this guidance. Those areas in which there are shortcomings have been identified and are being addressed in the program upgrading. At the completion of this project, JCP&L will either:

1. Implement the guidance,
2. Document an acceptable alternative, or
3. Take exception to the guidance.

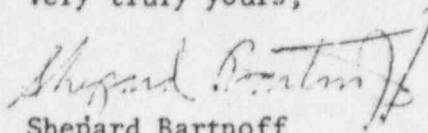
Since many of the endorsed ANSI Standards are construction oriented, some areas do not apply to operating plants. In addition, the audit has identified contradictory guidance and this is being resolved in accordance with the JCP&L Operational Quality Assurance Plan. The identified shortcomings have been categorized by subject and are incorporated in the overall schedule for Operational Quality Assurance Program upgrading.

Appendix A to this letter addresses your specific findings. JCP&L has set December 31, 1975 as a date at which it will implement a major portion of its upgrading program. Some of the objectives, such as an integrated document control and record retention system, require a long lead time and cannot be accomplished in such a short time frame. These major efforts are identified, and ambitious schedules have been set for their implementation. June 30, 1976, is another significant date in that all but a very few of the longest lead time items will be completed.

In conclusion, JCP&L is committed to upgrading its Operational Quality Assurance Program in a complete, deliberate, organized, and timely

fashion. This commitment is reflected in the significant manpower and resource allocation which has been made in this regard.

Very truly yours,



Shepard Bartnoff
President

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Attachment