


Jersey Central Power & Light Company



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MEMBER OF THE
General  Public Utilities Corporation

May 2, 1974

Mr. Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Directorate of Licensing
United States Atomic Energy Commission
Washington, D. C. 20545



Dear Mr. Ziemann:

Subject: Oyster Creek Station
Docket No. 50-219
Operational Quality Assurance Plan

The following information is in response to your letter dated March 22, 1974 regarding the Jersey Central Power & Light Company (JCP&L) Operational Quality Assurance Plan (Plan). The responses are keyed to your remarks by number.

1. With respect to General Public Utilities Service Corporation (GPUSC), it is our intention to utilize the services of GPUSC to support design, modification, maintenance, repair, procurement, special processes, inspections, and tests. In such instances, the GPUSC personnel will either be integrated into JCP&L and function in the same manner as employees of JCP&L, or under the provisions of our service contract with GPUSC, the Vice President-Generation will utilize the project management facilities of GPUSC. If the latter arrangement is utilized, the Vice President-Generation will review and approve the Project Organization and Responsibilities Document and the Project Quality Assurance Plan in accordance with Section I of the JCP&L Plan under the responsibility of the Vice President-Generation. With the exception of GPUSC, the Vice President-Generation has delegated this responsibility to the Manager-Operational Quality Assurance who, in accordance with Section VII, Part A of the Plan, is responsible for evaluating quality assurance programs of organizations providing materials, parts, components, or services. Approval of quality assurance programs (except GPUSC as stated above) is the responsibility of the Manager-Operational Quality Assurance as stated in Appendix D of the Plan and amplified by Section VII, Part A of the Plan.

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As stated in Section II of the Plan, the Manager-Operational Quality Assurance is responsible for maintaining a comprehensive training program for both original and refresher training of personnel on the Operational Quality Assurance staff. This training program is established to assure personnel qualifications.

2. Section VII, Part B of the Plan discusses surveillance. As stated, surveillance is conducted to check for Quality Assurance Program implementation and product conformance to purchase order requirements. In addition, Section XVIII of the Plan discusses audits and states, in part, "Organizations providing goods and/or services are subject to the appropriate requirements of this program and thus audits". In this case, these audits would be classified as "external audits" in accordance with the Plan. In the case of both surveillance and audits, JCP&L Operational Quality Assurance is responsible.

In the case of GPUSC, the Vice President-Generation will ensure that appropriate audits are conducted on the GPUSC Quality Assurance Program.

With respect to GPUSC, JCP&L fulfills its responsibilities as holder of the operating license through the following management mechanisms. These mechanisms, which are incorporated into the Project Organization and Responsibilities Document, are:

- (1) An officer of JCP&L is designated as being responsible for all official communication with the AEC.
- (2) JCP&L approves directly, or by inclusion in the Facility Description and Safety Analysis Report, Project Quality Assurance Plans and revisions thereto.
- (3) The Vice President-Generation of JCP&L maintains current awareness of the status of quality-related matters on the project by receiving:
 - a. Copies of all deficiency reports issued by the Project Quality Assurance Organization,
 - b. Monthly status reports of disposition of the deficiency reports, and
 - c. Copies of reports of audits conducted by the Project Quality Assurance Organization.
- (4) The Vice President-Generation of JCP&L receives a monthly report of the Project Quality Assurance activities.

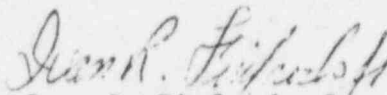
- (5) The Vice President-Generation receives a copy of a semi-annual report on the activities of the GPUSC Quality Assurance Department.
 - (6) The Vice President-Generation participates in a management review of the effectiveness of the GPUSC quality assurance programs at least once each calendar year.
 - (7) The Vice President-Generation has line responsibility for the JCP&L personnel who, in accordance with the JCP&L Operational Quality Assurance Plan and Oyster Creek Technical Specifications, will officially accept materials, parts, components, and services after successful completion of a project. The official acceptance involves a review of all documentation related to the material, part, component, or service which is being accepted to verify that it is acceptable and that the documentation is complete.
3. With reference to the "Orange Book", JCP&L intends to comply with the applicable portions of the following ANSI Standards:
- (1) ANSI N 18.1, June 22, 1970, "Proposed Standard for Selection and Training of Personnel for Nuclear Power Plants" as endorsed by Safety Guide 1.8".
 - (2) ANSI N 18.7-1972, "Administrative Controls for Nuclear Power Plants".
 - (3) ANSI N 45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants" which is endorsed by Safety Guide 1.33.
 - (4) ANSI N 45.2.1-1973, "Cleaning of Fluid Systems and Associated Components During the Construction Phase of Nuclear Power Plants" which is endorsed by Regulatory Guide 1.37.
 - (5) ANSI N 45.2.2-1972, "Packaging, Shipping, Receiving, Storage, and Handling of Items for Nuclear Power Plants" which is endorsed by Regulatory Guide 1.38.
 - (6) ANSI N 45.2.3-1973, "Housekeeping During the Construction Phase of Nuclear Power Plants" which is endorsed by Regulatory Guide 1.39.
 - (7) ANSI N 45.2.4-1972, "Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Instrumentation and Electric Equipment During the Construction Phase of Nuclear Power Plants" which is endorsed by Safety Guide 1.30.

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- (8) ANSI N 45.2.6-1973, "Qualifications of Inspection, Examination, and Testing Personnel for the Construction Phase of Nuclear Power Plants" which is endorsed by Regulatory Guide 1.58.
- (9) ANSI N 45.2.9-Draft 11, Rev. 0, January 17, 1973, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records".
- (10) ANSI N 45.2.10-1973, "Quality Assurance Terms and Definitions".
- (11) ANSI N 45.2.11-Draft 3, Rev. 1, July 1973, "Quality Assurance Requirements for the Design of Nuclear Power Plants" which is endorsed by Regulatory Guide 1.64.
- (12) ANSI N 45.2.12-Draft 3, Rev. 1, June 26, 1973, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants".
- (13) ANSI N 45.2.13-Draft dated May 1973, "Supplementary Quality Assurance Requirements for Control of Procurement of Equipment, Materials, and Services for Nuclear Power Plants".

In the event the requirements of these Standards are different from the positions taken in the Oyster Creek Operational Quality Assurance Plan, ICP&L will implement the Plan rather than the Standard.

Very truly yours,



Ivan R. Finfrock, Jr.
Vice President

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