Additional responsibilities include providing recommendations or solutions to quality problems, and performing monitoring, assessments and audits for all areas except for licensing activities and IOSRG. The Manager(s), Assessment has responsibility for these activities when monitoring, assessing, and/or auditing licensing and IOSRG activities.

For on-site independent review issues involving licensing activities and IOSRG, the Manager(s) Assessment has the authority to directly report to and communicate with the Director, Nuclear Safety and Technical Services.

The Director-Nuclear Safety Assessment reports directly to the Director- Nuclear Safety & Technical Services and has direct unencumbered access to the Directors of each of the nuclear stations with regard to activities affecting quality. This reporting relationship has been established to provide sufficient independence from the influence of costs and schedules to be able to effectively assure conformance to Quality Assurance Program requirements.

The Director-Nuclear Safety Assessment has no duties or responsibilities unrelated to the responsibilities contained in this document that would prevent the required attention to quality assurance matters. The Director-Nuclear Safety Assessment has the authority and responsibility to:

a. Develop and administer the maintenance of the Operational Quality Assurance Plan and Nuclear Safety Assessment procedures required to assure that all GPU Nuclear activities provide the required high degree of safety and reliability.

b. Assess, audit, and monitor the conduct of GPU Nuclear activities to assure that they provide the required high degree of safety and reliability and are carried out consistent with all applicable laws, regulations, regulatory commitments, licenses, corporate policies and other requirements. Assessment schedules are developed and implemented to ensure all required areas are assessed.

c. Establish and conduct of nuclear safety review and assessment activities which include those of the nuclear stations' Independent On-site Safety Review Group and the General Office Review Board.

d. Identify and report nonconformances as they may exist. Initiate, recommend or provide solutions through designated channels. Verify implementation of resolutions as required.

e. Initiate stop work or unit shutdown recommendations when warranted by a safety concern and obtain unit shutdown with appropriate upper-management concurrence.

f. Provide for a review of selected documents which prescribe methods for activities and quality requirements for items within the scope of this Plan. Refer to Appendix B of this Plan.

g. Provide for a review for concurrence of Contractor and Vendor Quality Assurance Programs as specified in Section 5.

h. Direct and manage Nuclear Safety Assessment.

Guides. Nuclear Safety Assessment provides GPU Nuclear documented positions and interpretations on all other regulatory guides not contained in Appendix C of this Plan as may be required.

2.10 Resolution of Disputes and Escalations

All personnel, including those performing assurance activities who are not part of Nuclear Safety Assessment, have access to the Director-Nuclear Safety Assessment to raise quality or safety concerns. Disputes involving quality or safety arising from a difference of opinion shall, if possible, be resolved at the level at which such disputes occur. If this is not possible, the difference of opinion shall be escalated through supervisory/management levels until resolution is achieved.

The Director-Nuclear Safety Assessment shall make the decision on matters related to if and to what degree this Plan applies to activities, quality requirements, and verification and acceptance to established requirements.

The Director-Engineering shall make the decision on matters related to classification of items, and technical requirements or design changes.

The responsibility of the Director, Nuclear Safety Assessment for QA Plan implementation takes precedence over his other duties. In the event of a conflict between the Manager(s) Assessment and any non-QA activity reporting to the Director, Nuclear Safety Assessment, the director will delegate his authority to resolve the conflict to the Manager(s) Assessment. The Manager(s) Assessment has authority to report directly to the Director, Nuclear Safety and Technical Services.

The Director-Nuclear Safety Assessment shall be responsible for evaluating deficiencies generated by Nuclear Safety Assessment, as specified in 8.2.8 of this Plan. Escalation of significant deficiencies to higher management levels shall be evaluated in accordance with written procedures when inadequate or untimely responses occur.

2.11 Safety Review Program

The safety review program consists of technical review and, as necessary, an independent safety review.

The technical review is a thorough review conducted by someone other than the individual who prepared the work. This review is performed by a qualified Responsible Technical Reviewer on documents and substantive revisions of documents as specified by the GPU Nuclear Review and Approval Matrix. (1000-ADM-1291.01)

The independent safety review is an independent review of documents and substantive revisions of documents as specified by the GPU Nuclear Review and Approval Matrix. It includes a review of a safety evaluation. This review is conducted by a qualified Independent Safety Reviewer (ISR) on safety evaluations associated with documents and substantive revisions to documents as specified by the GPU Nuclear Review and Approval Matrix. The ISR shall not have direct responsibility for the activity reviewed.

Appendix C - Part 2

NRC Regulatory Guide 1.30, August 1972

Quality Assurance Requirements for the Installation, Inspection and Testing of Instrumentation and Electric Equipment

GPU Nuclear 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, GPU Nuclear 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 1978

Quality Assurance Program Requirements (Operation)

The GPU Nuclear 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 the minimum topical coverage of internal audits will be consistent with Appendix E of this Plan.

2. Paragraph 5.1 of ANSI N18.7-1976 titled "Program Description"

   This paragraph refers to the compilation of a "summary document" to identify the sources, index the source documents to the requirements of this standard and to provide a consolidated base for the description of the program. For the purpose of clarity, this "GPU Nuclear Operational Quality Assurance Plan" is the "summary" document required. Appendix A correlates the sections of this Plan to ANSI 18.7-1976. Section 2.0 provides the "consolidated" base and description for the program. Implementing documents are identified in Section 3.0, are required to be consistent with this Plan and Appendix C of this Plan, and are marked as stated in Section 3.0.

3. Paragraph 5.2.2 of ANSI N18.7-1976 titled "Procedure Adherence"

   In accordance with Section 6.8.3 of both the Oyster Creek and TMI-1 Technical Specifications, temporary changes shall be approved by two members of GPU Nuclear Management Staff qualified as Responsible Technical Reviewers and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of facility systems or equipment, at least one of these individuals shall be a member of facility management or supervision holding a Senior Reactor Operator's License on the facility.