



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

GPU NUCLEAR OPERATIONAL QUALITY ASSURANCE PLAN

REVISION 10

THREE MILE ISLAND NUCLEAR GENERATING STATION, UNIT 1

DOCKET NO. 50-289

AND OYSTER CREEK NUCLEAR GENERATING STATION

DOCKET NO. 50-219

1.0 INTRODUCTION

By letter dated April 25, 1997, and supplemented by letters dated June 18 and July 10, 1997, GPU Nuclear submitted Revision 10 of the Operational Quality Assurance Plan. The proposal, submitted on behalf of Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1), and Oyster Creek Nuclear Generating Station (OCNGS), identifies organizational changes in the licensee's management. A major element of the reorganization is the proposed merging of the Nuclear Safety Assessment Department (NSA) and the Licensing and Regulatory Affairs Department (L&RA) under a single director. The new department would retain the name Nuclear Safety Assessment and assimilate the responsibilities of the L&RA. L&RA is responsible for, among other things, the management of the nuclear safety review process (10 CFR 50.59). Three management positions in the current NSA organization would be eliminated; a new position, General Office Review Board (GORB) Consultant would be created and the site licensing function would report to the newly created position Manager-Nuclear Safety and Licensing. This safety evaluation contains a brief description of the staff's analysis of the proposed changes.

2.0 EVALUATION

The following are the applicable review criteria and regulatory requirements used to evaluate the proposed organizational changes.

2.1 Standard Review Plan (SRP) Chapters 17.1 and 17.2

Section II.1 of SRP Chapter 17.2, "Quality Assurance During the Operations Phase," refers, with some exceptions, to the acceptance criteria of SRP Chapter 17.1, Section II.1, for the organizational elements of a quality assurance (QA) program. Included in the acceptance criteria are provisions applicable to the quality organization management in the areas of

(a) independence from cost and schedule pressures, (b) communication channels with senior management positions to resolve quality problems, (c) duties and responsibilities unrelated to QA that would prevent full attention to QA matters, and (d) relative position in the organizational hierarchy.

## 2.2 SRP Chapter 13.4

Section II delineates acceptance criteria for reporting relationships for the independent review function and the independent safety engineering group (ISEG). ISEG should report to a technically oriented management position that is not in the management chain for power production.

## 2.3 Appendix B to 10 CFR Part 50

Criterion I, Organization, of Appendix B to 10 CFR Part 50, discusses requirements for organizational independence and the fact that personnel performing QA responsibilities have sufficient authority to identify and report quality problems. Because of the many variables involved, such as the number of personnel and the type of activity being performed, the organizational structure for executing the QA program may take various forms provided that the persons and organizations assigned the QA functions have the required authority and organizational freedom. Criterion I was written in a manner that would not dictate any particular organizational structure to assure independence, but rather that it would be flexible enough to accommodate the various organizational configurations that may be necessary to properly execute specific activities performed by a licensee. The acceptability of any given organizational structure remains predicated upon the effective implementation of the overall QA program by the licensee.

The proposed changes in the licensee's Operational Quality Assurance (OQA) Plan and the associated staff evaluations are discussed below.

## 2.4 Realignment of Licensing and Regulatory Affairs

The responsibilities of the Director-NSA position would be amended to retain the requisite organizational independence based on the following considerations:

1. The Director-NSA would be responsible to assess, audit, and monitor the conduct of GPU Nuclear activities to assure that they provide the required degree of safety and reliability and are carried out consistent with all applicable laws, regulations, regulatory commitments, licenses, corporate policies and other requirements.
2. The Manager-Assessment will be responsible for providing recommendations on solutions to quality problems and performing monitoring, assessments, and audits for the areas of licensing and the Independent On-site Safety Review Group (IOSRG).
3. The Director-NSA would not be responsible for any activities unrelated to responsibilities described in the OQA Plan that would prevent the required attention to

QA matters. Further, the responsibility for the implementation of the QA plan will take precedence over the other duties of the Director-NSA.

4. The Director-NSA would have explicitly defined accessibility to the President (for selected activities), to the Director-Nuclear Safety & Technical Services and, to appropriate nuclear station directors for any significant quality-related problem or deficiency.
5. For onsite independent review issues involving the licensing and IOSRG areas, the Manager-Assessment has the authority to directly report to and communicate with the Director-Nuclear Safety & Technical Services.
6. In the event of a conflict between the Manager-Assessment and any other non-QA activity reporting to the Director-NSA, the Director-NSA will delegate his authority to resolve the conflict to the Manager-Assessment. The Manager-Assessment has the authority to report directly to the Director-Nuclear Safety & Technical Services.

The staff considers the above provisions are acceptable to ensure that sufficient independence is maintained within the NSA management structure related to the assumption of the Licensing and Regulatory Affairs Department responsibilities by the Director-NSA.

In regard to organizational structure, the stature of the Director-NSA will not change. However, under certain situations the responsibility for carrying out provisions of the OQA Plan will be delegated to the Manager-Assessment. In those cases, the Manager-Assessment is provided with the authority to report to a more senior manager to resolve the quality issues. The staff considers these provisions acceptable.

#### 2.5 Qualification Requirements for Certain NSA Managers

Revision 10 of the OQA Plan eliminates the qualification requirements (academic degree in engineering or physical science and 5 years of experience) for NSA managers who do not report directly to the Director-NSA as described in Section 1.9 of the OQA Plan. In the proposed organizational structure, all NSA management positions will report directly to the Director-NSA. The alternate qualification provision is therefore no longer applicable. The more conservative education and experience requirements (degree in engineering or physical science and 10 years of experience) for managers that directly report to the Director-NSA will remain in effect. The staff finds this change acceptable as NSA managers will satisfy appropriate education and experience provisions.

#### 2.6 General Office Review Board (GORB)

The licensee has created a position of GORB consultant to assist the Director-NSA in his GORB responsibilities. The Director-NSA will remain the GORB Chairman and will continue to propose recommendations to the President-GPU Nuclear. The staff finds the addition of a GORB consultant acceptable.

### 2.7 Independent On-site Safety Review Group (IOSRG)

The licensee has proposed to amend the organizational structure so that the IOSRG reports through the Manager-Nuclear Safety and Licensing rather than the Manager-NSA. This alignment meets the pertinent acceptance criteria of the SRP. The staff finds the revised reporting relationship of the IOSRG acceptable.

### 3.0 CONCLUSION

In accordance with the SRP review criteria in Chapters 17.1, 17.2, and 13.4, the staff has determined that the proposed organizational structure is acceptable. While the OQA Plan Revision 10 change constitutes a reduction of the commitments in the QA program description previously approved by the NRC, we conclude that the revised program continues to satisfy the requirements of Appendix B to 10 CFR Part 50.

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