



FirstEnergy Nuclear Operating Company

76 South Main Street  
Akron, OH 44308

**John P. Stetz**  
President

330-384-5878  
Fax: 330-384-5669

November 11, 1999  
DBNPS Serial 2627  
PNPP Letter Number PY-CEI/NRR-2444L

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555-0001

Davis-Besse Nuclear Power Station  
Operating License No. NPF-3  
Docket No. 50-346

Perry Nuclear Power Plant  
Operating License No. NPF-58  
Docket No. 50-440

Subject: Request for Approval of Quality Assurance Program Changes for the  
Davis-Besse Nuclear Power Station and the Perry Nuclear Power Plant:  
Submittal of Additional Information

Ladies and Gentlemen:

The FirstEnergy Nuclear Operating Company (FENOC) submitted a request to the NRC for review of changes to the Quality Assurance Programs at the Davis-Besse Nuclear Power Station (DBNPS) and the Perry Nuclear Power Plant (PNPP) on August 19, 1999 (DBNPS Letter Serial 2603 and PNPP Letter Number PY-CEI/NRR-2411L). These changes were submitted in support of converting the plants' individual Quality Assurance Programs to a FENOC Quality Assurance Program covering both plants.

On November 4, 1999, a telephone call discussion was held between the NRC staff and the licensee staffs regarding the "Regulatory Commitments" portion of the submittal. As a result of this discussion, the DBNPS and PNPP staffs are providing additional information regarding the position associated with Regulatory Guide (RG) 1.58 proposed within the August 19, 1999, letter. Specifically, a sentence has been added to the FENOC Quality Assurance Program that states Local Leak Rate Test personnel are qualified to RG 1.8, Revision 1, "Personnel Selection and Training," rather than to RG 1.58.

Q004

PPR ADOCK

The revised page of the FENOC Quality Assurance Program Manual is attached. There are no new commitments generated by this submittal for either the DBNPS or the PNPP. The proposed program continues to satisfy the requirements of 10 CFR 50, Appendix B because the appropriate indoctrination and training requirements are provided by RG 1.8, Revision 1.

If you have questions or require additional information, please contact either Mr. James L. Freels, Manager - Regulatory Affairs (DBNPS), at (419) 321-8466, or Mr. Gregory A. Dunn, Manager - Regulatory Affairs (PNPP), at (440) 280-6305.

Very truly yours,



Attachments

cc: NRC Project Manager, Davis-Besse Nuclear Power Station  
NRC Project Manager, Perry Nuclear Power Plant  
NRC Senior Resident Inspector, Davis-Besse Nuclear Power Station  
NRC Senior Resident Inspector, Perry Nuclear Power Plant  
NRC Region III  
Utility Radiological Safety Board

## **FENOC** *FirstEnergy Nuclear Operating Company*

### QUALITY ASSURANCE PROGRAM MANUAL

---

- b. The requirements of Position A of this Guide apply to surfaces within containment with the following exceptions:
  - 1) Surfaces to be insulated.
  - 2) Surfaces contained within a cabinet or enclosure.
  - 3) Repair/touchup areas less than 30 square inches or surface areas such as: cut ends; bolt heads, nuts and miscellaneous fasteners; and damage resulting from spot, tack or arc welding.
  - 4) Small items such as small motors, handwheels, electrical cabinets, control panels, loud speakers, motor operators, etc. where special painting requirements would be impracticable.
  - 5) Stainless steel or galvanized surfaces.
  - 6) Banding used for insulated pipe.
- 2. FENOC commits to the requirements of ANSI N101.4-1972 for activities comparable in nature and extent to construction phase activities as modified by the commitment to Regulatory Guide 1.54.
- K. Regulatory Guide 1.55 (Revision 0) [June 1973], *Concrete Placement in Category 1 Structures***
  - 1. FENOC commits to the regulatory position of this Guide for activities that are comparable in nature and extent to construction phase activities for the Perry Nuclear Power Plant.
- L. Regulatory Guide 1.58 (Revision 1) [September 1980], *Qualification of Nuclear Power Plant Inspection, Examination and Testing Personnel***
  - 1. FENOC commits to the regulatory position of this Guide with the following clarifications:
    - a. The guidance of this Regulatory Guide shall be followed as it pertains to the qualification of personnel who verify conformance of work activities to quality requirements.
    - b. Personnel will not be certified as stated in this Guide in the following areas:
      - 1) Individuals that handle test results or perform document control activities.
      - 2) Quality assurance and staff personnel responsible for the review of documents for clarity and completeness.

**Table 1**  
**Regulatory Commitments**  
Revision 0

**FENOC** FirstEnergy Nuclear Operating Company

**QUALITY ASSURANCE PROGRAM MANUAL**

Additional  
Information

3) Test personnel utilizing gas test methods for information or data collection activities (this includes those personnel performing local leak rate testing (LLRT) as stated in 10CFR50 Appendix J). The qualifications of these personnel shall conform to the requirements of Regulatory Guide 1.8.

4) Plant operation personnel concerned with day-to-day operation, maintenance, and certain technical services (the qualifications of these personnel shall conform to the requirements of Regulatory Guide 1.8).

c. Personnel who perform nondestructive examination activities shall meet the qualification requirements of SNT-TC-1A (1980) as described below.

2. FENOC commits to the requirements of ANSI N45.2.6-1978 as modified by the commitments to Regulatory Guide 1.58.

3. FENOC commits to the requirements of SNT-TC-1A (1980) with the following clarifications:

a. For Davis-Besse:

1) The word "should" in the following paragraphs of SNT-TC-1A (1980) shall be considered "shall": 4.3(1), 4.3(2), 4.3(3), 6.3, 7.1, 7.2, 8.1, 8.1.1(1), 8.1.1(2), 8.1.1(3), 8.1.1(4), 8.1.2(1), 8.1.2(2), 8.1.3(1), 8.1.3(2), 8.1.4(1), 8.1.4(2), 8.1.4(3), 8.1.5, 8.3, 8.3.1(1), 8.3.1(2), 8.3.2(3), 8.3.4, 8.4.2, and 9.7.3.

2) Paragraph 8.4.4 recommends a composite grade of 80% and a grade of 70% for the general, specific, and practical or the basic method, and specific examination. Davis-Besse commits to this recommendation.

b. For Perry:

1) Personnel who perform nondestructive examination activities (including NDE gas leak testing) shall meet the qualification requirements of SNT-TC-1A (1980) as modified by ASME Code Case 356.

M. Regulatory Guide 1.64 (Revision 2) [June 1976], *Quality Assurance Requirements for the Design of Nuclear Power Plants*

1. FENOC commits to the regulatory position of this Guide with the following clarifications:

a. Section C.2(1) addresses the use of a supervisor in design verification. If, in exceptional circumstances, the supervisor is the only technically qualified individual available, the design verification or checking shall be conducted by the supervisor with the following provisions:

Table 1  
Regulatory Commitments  
Revision 0

**COMMITMENT LIST**

**THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY THE DAVIS-BESSE NUCLEAR POWER STATION (DBNPS) IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THIS SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS BY THE DBNPS. THEY ARE DESCRIBED ONLY FOR INFORMATION AND ARE NOT REGULATORY COMMITMENTS. PLEASE NOTIFY THE MANAGER-REGULATORY AFFAIRS (419-321-8466) AT THE DBNPS OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.**

**COMMITMENT**  
None

**DUE DATE**  
Not Applicable

**COMMITMENT LIST**

**THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY THE PERRY NUCLEAR POWER PLANT (PNPP) IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THE SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS BY THE PNPP. THEY ARE DESCRIBED ONLY AS INFORMATION AND ARE NOT REGULATORY COMMITMENTS. PLEASE NOTIFY THE MANAGER – REGULATORY AFFAIRS (440-280-6305) AT PNPP OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.**

**COMMITMENTS**

None

**DUE DATE**

Not Applicable