

Docket No. 50-320

MAR 20 1981

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Mr. Gale K. Hovey
Vice President and
Director of TMI-2
Metropolitan Edison Company
P.O. Box 480
Middletown, Pennsylvania 17057

SUBJECT: TMI-Unit 2, Recovery Quality Assurance Plan

Dear Mr. Hovey:

We have reviewed the TMI-2 Recovery Quality Assurance (QA) Plan and the organizational changes made since the TMI-2 accident as submitted in your October 30, 1980 letter and found that the concepts described therein provide sufficient QA controls to carry out the planned decontamination effort and Recovery QA Plan for TMI-2 in an effective manner. The plan is commensurate with the TMI-1 Restart QA Program and satisfies the requirements of Appendix B of 10 CFR, Part 50, and is therefore acceptable with the exception of the outstanding items noted below.

The criteria to be used to identify the systems, structures, and components to which the TMI-2 Recovery QA Plan applies were presented in Section 2.1.2, but the complete listing of systems, structures, and components was not provided. It is our position that the listing (Q-list) of structures, systems, components, and other safety aspects (e.g., meteorology, plant security) to which the QA program applies, be included or referenced in the TMI-2 Recovery QA Plan, and include all items affecting safety.

These items can be derived from the General Design Criteria given in Appendix A to 10 CFR, Part 50 and from other pertinent regulations, as well as the items included in positions 1 through 4 of Regulatory Guide 1.29 plus spare and replacement parts, and consumables and expendables needed for the various activities performed in connection with those items. The TMI-2 Recovery QA Plan would then be applicable to all future activities (backfit not required) conducted in connection with these items such as maintenance, modification, repair, performance testing, surveillance testing, and replacement. As required by Criterion II, "Quality Assurance Program," of Appendix B to 10 CFR, Part 50, the QA program shall provide control over all activities affecting the quality of the identified items to an extent consistent with their importance to safety. In this regard, the extent of applicability of the 18 criteria of Appendix B to 10 CFR, Part 50 and related requirements given in the SRP, Regulatory Guides, and endorsed standards to a specific item to assure that the specified design requirements and subsequent activities for the item are properly implemented shall be determined through a technical evaluation conducted by your Engineering and QA organizations. We request that this list be submitted for NRC staff review within 90 days after receipt of this letter.



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Mr. Gale K. Hovey

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In Appendix C, Part 2 of the TMI-2 Recovery QA Plan, a commitment is made (with certain exceptions) to comply with Regulatory Guide 1.58, proposed Revision 1, July 1979, "Qualifications of Nuclear Power Plant Inspection, Examination, and Testing Personnel," which differs somewhat from the current NRC approved issue of Regulatory Guide 1.58, Revision 1, dated September 1980. It is our position that the guidance given in the Revision 1 of this regulatory guide, noting in particular the implementation guidance, should be followed. It is also our position that you commit to implement Regulatory Guide 1.146, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants", (August 1980) for the TMI-2 Recovery QA Plan.

Accordingly, we conclude that your description of the quality assurance program for the TMI-2 Recovery Phase, subject to resolution of the above outstanding items, indicates that an effective QA program in compliance with applicable NRC regulations can be established and implemented.

Sincerely,

BS
Bernard J. Snyder, Program Director
TMI Program Office
Office of Nuclear Reactor Regulation

cc:
See attached

TMIPQ:NRR	TMIPQ:NRR	QAB:DE:NRR	TMIPQ:NRR	TMIPQ:NRR
Indexer/pf DBri	WHaass	Rweller	Snyder	
3/17/81	3/18/81	3/18/81	3/19/81	3/19/81

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