Nuclear

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December 22, 1983
4410-83-L-0263

TMI Program Office
Attn: Dr. B. J. Snyder
Program Director
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Quality Assurance Plan, Revision 2

In your letter of October 17, 1983, which approved Revision 2 of the TMI-2 Quality Assurance Plan, you requested that several actions be taken. GPUNC's response to these items is included as Attachment 1 to this letter.

Additionally, GPUNC Letter 4410-83-L-0032 dated April 11, 1983, requested a partial exemption from the update requirements of 10 CFR 50.59(a) for TMI-2. As your response dated October 17, 1983, did not address this request, GPUNC assumes that this request is still undergoing NRC review and no further action on GPUNC's part is required.

If you have any questions or need additional information, please contact Mr. J. J. Byrne of my staff.

Sincerely,

B. K. Kanga

B. K. Kanga
Director, TMI-2

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BKK/JJB/jep

Attachment

CC: Mr. L. H. Barrett, Deputy Program Director - TMI Program Office

NRC COMMENT NO. 1

The Quality Classification List (QCL) addressed in Section 2 of the QA Plan should be updated within 30 days of receipt of this letter, eliminating the term "important to recovery". Those items previously identified as "important to recovery" are to be reclassified as either "important to safety" or "not important to safety" using the updated engineering methodology.

GPUNC RESPONSE

The updated QCL was issued on July 1, 1983, as part of GPUNC Procedure No. 4000-ENG-7313.01, "TMI-2 Recovery Quality Classification List". This updated QCL eliminated the term "important to recovery" and reclassified each structure, system, or component appropriately.

NRC COMMENT NO. 2

The revised QCL and all GPUNC procedures that describe quality classification criteria and methodology should be submitted to the NRC TMI Program Office for review. It is the staff's understanding that this information is presently contained in GPUNC Procedure 4000-ENG-7313.01 dated July 1, 1983. GPUNC will be notified within 30 days if this document and any other applicable documents are found unacceptable. Future changes to this and other applicable documents shall be forwarded to the NRC for approval prior to implementation. During the initial 30 day NRC review period, you should continue to use the July 1, 1983, revision of GPUNC Procedure 4000-ENG-7313.01 and the current GPUNC approved version of other associated procedures.

GPUNC RESPONSE

The updated QCL, as contained in GPUNC Procedure 4000-ENG-7313.01, is included as Attachment 2 to this letter and is forwarded for your information. GPUNC will respond to any comments you may have on this document. Additionally, as discussed with members of your staff, any decisions which lessen the quality classification of a listed system will be forwarded to the TMI Program Office for information. GPUNC will also forward to the TMI Program Office any periodic updates of the QCL and other applicable documents.

GPUNC Procedure 4000-ENG-7313.01 will not be forwarded to the NRC for approval. Appendix A to TMI-2's operating license contains the Interim Recovery Technical Specification for TMI-2. Section 6 of this document provides criteria specifying which procedures and changes thereto are subject to approval by the NRC prior to implementation. These procedures are those which:

- directly relate to core cooling,
- could cause the magnitude of radiological releases to exceed limits established by the NRC,

- could increase the likelihood of failures in systems important to nuclear safety and radioactive waste processing or storage, and
- alter the distribution or processing of significant quantities of stored radioactivity or radioactivity being released through known flowpaths.

The GPUNC procedure requested by your letter for review and approval simply establishes the QCL and the criteria for maintaining the QCL. As this procedure does not authorize any plant activities, none of the criteria listed above are applicable and, therefore, is not subject to prior NRC approval under the TMI-2 Technical Specifications. This procedure is, of course, available for NRC inspection and GPUNC will respond to any questions or comments you may have on this document.

NRC COMMENT NO. 3

The clarifications as to the applicability of Regulatory Guides 1.30 (Page 107 of the QA Plan), 1.37 (Page 109 of the QA Plan), 1.39 (Page 112 of the QA Plan), and 1.116 (Page 116 of the QA Plan) to the operational phase should be deleted since the application of the Regulatory Guides are clearly stated. This change is to be scheduled for incorporation in the next revision of the QA Plan.

GPUNC RESPONSE

Based on further discussions with members of the NRC, GPUNC understands that the concern with these Regulatory Guide positions is that they appear to be lessening GPUNC's commitment to them. As discussed with the NRC, this was not GPUNC's intent. In light of this, the positions described for: (1) Regulatory Guides 1.30 and 1.116 will not be changed as these positions are consistent with Chapter VI of the QA Plan, (2) Regulatory Guide 1.37 will be revised to delete the second paragraph of Item 6 of the clarified position, and (3) Regulatory Guide 1.39 will be revised to delete the last sentence of Item 3 of the clarified position.

NRC COMMENT NO. 4

The clarification Items 2.B and 2.C to Regulatory Guide 1.58, Revision 1 (Page 114 of the QA Plan) should be modified to assure that evaluations of inspection and test activities and training programs will be performed by personnel having documented evidence that they have demonstrated their proficiency in accomplishing the assigned Level II and III responsibilities in an acceptable manner. This change should be scheduled for incorporation in the next revision to the QA Plan.

GPUNC RESPONSE

Based on further discussions with members of the NRC, GPUNC understands that the concern with this position is that GPUNC would not evaluate proficiency of inspection personnel. This is not GPUNC's intent, however, and as discussed with the NRC, GPUNC interprets the statement "competent to perform these functions" with regard to inspection personnel as requiring proficiency to be evaluated as required in Section 2.4 of ANSI N45.2.6.

NRC COMMENT NO. 5

The Plan should clearly state that in the event conflicts exist between the QA Plan and the approved Technical Specifications, the Technical Specifications shall govern.

GPUNC RESPONSE

This comment was also discussed with members of the NRC staff in that GPUNC reviews QA Plan and Technical Specification revisions to assure they are consistent. Therefore, this clarification will not be added to a QA Plan revision.

The structures, components, and systems listed on the Quality Classification List (QCL) have been determined to be Important to Safety or Safety Related based on the definitions provided below.

Important to Safety Class (1) - A special classification of those structures, components, and activities that provide reasonable assurance that the facility can be operated without undue risk to the health and safety of the public. It encompasses the broad class of plant features covered (not necessarily explicitly) in the General Design Criteria, (10 CFR 50 Appendix A) that contributes in important ways to the safe operation and protection of the public in all aspects of facility operation (i.e., normal operation and transient control as well as accident mitigation). It includes "Safety-Related" as a subset.

Safety Related Class (1N) - A subset of Important to Safety and are those permanent plant structures, systems, components, or portions thereof designed to remain functional for the Safe Shutdown Earthquake (SSE) and which:

- are necessary to ensure the integrity of the reactor coolant boundary,
- are necessary to ensure the capability to shut down the reactor and maintain it in a safe shutdown condition, or
- whose failure could result in potential offsite exposures comparable to the guideline values of 10 CFR 100.

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System	Name	QCL	Comments
3153	Reactor Building	1N	
3154	Auxiliary Building	1N	
3155	Control Building	1N	
3156	Control Building Area	1N	
3157	Diesel Generator Building	1N	Seismic I portions only
3159	Fuel Handling Building	1N	
3160	Fuel Transfer Canal	1N	
3161	Spent Fuel Pools	1N	Including liners
3162	Service Building	1N	
3165	Post Cooling Towers	1	Structural basin only
3168	River Water Pumphouse	1N	
3175	Air Intake Tunnel	1N	Portion below grade
	Air Intake Pagoda	1	Above grade
3177	Chemical Cleaning Building	1	
3182	EPICOR II, TV Monitor and Control Building	1	
3184	Solid Waste Staging Facility	1	
3201	NSSS Supports	1N	
3202	Fuel Elements and Control Rods	1N	Control Rods Only.
3211	HPI/Makeup and Purification System	See below	
3211.1	HPI System	1N	
3211.2	MU and P System Letdown	See below	
3211.2.1	MU and P - Letdown from RCS to outermost Isolation Valve	1N	RCS pressure boundary and containment isolation.
3211.3	MU and P - Makeup and seal injection	1N	Excluding purification sub-loop between valves MU-V-224A, V-224B, V-226 and MU-V-107A, V-107B.
3211.4	Makeup Tank	1N	
3212	LPI/Decay Heat Removal	See below	
3212.1	LPI System	1N	
3212.2	Decay Heat Removal	1N	
3212.3	Borated Water Storage Tank	1N	
3212.4	Mini Decay Heat Removal Tank	See below	
	a. Pressure boundary, pump, and pump controls	1N	
	b. Process instrumentation	1	
3212.5	Alternate Decay Heat Removal	1N	Pressure boundary only.

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System	Name	QCL	Comments
3213	Core Flood System	See below	
	a. Piping from RCS up to and including CF-V1A and CF-V1B	1N	
	b. Containment penetrations including containment isolation valves	1N	
3214	Reactor Building Spray	See below	
	a. Valves BS-V-3A and BS-V-3B	1N	Closed valves isolate from DH
	b. Containment penetrations including containment isolation valves	1N	
3220	Reactor Coolant System	See below	RCS pressure boundary is that portion required to maintain pressure or fluid boundary.
3221	Reactor Vessel	1N	
3221.1	Standby Reactor Coolant Pressure Cnt. System	1	
3221.1.1	Nitrogen Supply for Standby Reactor Coolant Pressure Control System	1	
3222	RCS Venting System	1N	RCS Pressure boundary only
3223	Pressurizer	See below	
3223.1	Pressurizer Vessel	1N	RCS Pressure boundary only
3223.2	Pressurizer PORV	1N	RCS Pressure boundary only
3223.3	Pressurizer Code Safety Valves	1N	RCS Pressure boundary only
3223.4	Pressurizer Spray System	1N	RCS Pressure boundary only
3223.5	Pressurizer PORV Block Valve	1N	RCS Pressure boundary control
3224	Steam Generators	1N	Primary and secondary pressure boundary
3224.3	OTSG Decontamination and Layup System	1	Pressure boundary only
3225.2	Control Rod Drive Mechanism	1N	RCS pressure boundary only
3226	Reactor Coolant Pumps	1N	RCS pressure boundary only
3228	Reactor Coolant System Pressure Boundary	1N	
3231	Gaseous Waste Disposal System	See below	
	a. Containment penetration including containment isolation valves	1N	
	b. Seismic I portions of system outside containment	1	
3232.1	Liquid Radwaste Disposal Fluid System	See below	
	a. Containment penetrations including containment isolation valves	1N	
	b. Seismic I portions of system outside containment	1	

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System	Name	QCL	Comments
3232.2	Reclaimed Boric Acid Tanks	1	
3232.3	Reactor Coolant Bleed Tanks	1	
3232.5	Deborating Demineralizers	1	
3233	Solid Radwaste Disposal System	1	Flow Diagram 2039
3241	Penetration Pressurization System	1	Seismic I portion attached to containment penetration
3242	Fluid Block System	1	Seismic I portion attached to containment penetration
3244	Reactor Building Isolation System	1N	
3245	Penetrations used for Recovery	1	Recovery added
3251	Spent Fuel Cooling System	1N	
3252	Fuel Handling System	1	
3254	Spent Fuel Racks		To be determined for Recovery
3257	Failed Fuel Canisters		To be determined for Recovery
3258	IIF Processing System	1	
3261	Reactor Servicing Equipment		To be defined on a case basis
3262	Incore Detector Disposal		To be determined for Recovery
3282	Shielding	1	Seismic I designed structures
3411.1	Main Steam System to MSIV's	1N	From OTSG up to and including MS-V-15A, MS-V-15B, MS-V-11A MS-V-11B
3411.2	Main Steam Isolation Valves	1N	
3411.3	Main Steam Safety Valves	1N	
3412.1	Atmospheric Dump Subsystem	1N	Main steam line pressure boundary up to and including MS-V-3A, MS-V-3B
3415	Main Steam to Relief Valve Post Supports	1	
3421.1	Main Condensate System: EFW Pump Suction from CST	1	Seismic I piping from CST to CO-V-82A, CO-V-82B (retains tankage for possible future use)
3422	Main Feed Water System	See below	
	a. From OTSG's up to and including FW-V-18A, FW-V-18B	1N	
	b. From FW-V-18A, 18B up to and including FW-V-19A, V19B, V17A, V17B	1	To establish system boundary
3424	Emergency Feedwater	1N	From OTSG up to and including EF-V-12A, V12B, V33A, V33B

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System	Name	QCL	Comments
3432.1	Steam Generator Vents and Drains	See below	To prevent sump boron
	a. From OTSG's up to and including CA-V8, V9, SV-V-52, SV-V-22	1N	dilution
	b. Containment penetrations including isolation valves	1N	
3442.1	Diesel Generator Fuel Oil Transfer	1N	
3442.2	Diesel Generator Fuel Oil Storage	1N	
3504.1	Filtration System Fire Protection and Drains	1	
3526	EPICOR II (Auxiliary Building)	1	
3527	Submerged Demineralizer System	1	
3527.1	SDS Monitor Tank	1	
3527.2	SDS Transfer	1	
3527.3	SDS Off-Gas System	1	
3531	Nuclear Services River Water System	1N	
3534	Reactor Building Emergency River Water	See below	
	a. Containment penetrations including isolation valves	1N	
	b. Piping inside containment	1	To prevent sump dilution
3535	Screen Wash System	1	
3541	Nuclear Services Closed Cooling Water	See below	
	a. In containment piping inboard of inside isolation valves	1	To prevent sump dilution
	b. All other N2 or seismic piping	1N	
3542	Intermediate Closed Cooling Water	See below	
	a. In containment piping inboard of inside isolation valves	1	To prevent sump dilution
	b. Containment penetrations including isolation valves	1N	
3543	Decay Heat Closed Cooling Water	1N	
3551	Nuclear Liquid Sampling System	See below	
	a. Piping in containment to outmost isolation valve	1N	
	b. Nuclear 2, Seismic I piping outside containment	1	
3552	Radgas Sampling	1	
3555.1	Nuclear Sampling (Recovery portion)	1	
3555.2	EPICOR II Sampling	1	
3558	Temporary Unit II Sampling	1	

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System	Name	QCL	Comments
3559	SDS Sampling	1	
3572.1	Reactor Building Sump	1N	
3572.2	Reactor Building Sump Screen	1N	
3572.3	Reactor Building Surface Suction Pump	1	
3573	Auxiliary Building Sumps and Drains	1	As requird to control possible releases
3574	Control Building Area Sump	1	As required to control possible releases
3576	Air Intake Tunnel Sump	1	
3593	Steam Generator Chemical Cleaning	1N	Containment penetrations R561, R565 only
3611	Control Room and Main Control Panels	1	
3613	Local Control Panels	1	As required to support ITS systems
3614	Remote Shutdown Panel	1	Operable channels
3623	Nuclear Instrumentation System	1	
3624.2	Steam Generator Instrumentation	See below	
	a. As required to measure OTSG level and pressure	1	
3625	Incore Monitoring System	1	
3635.1	In plant General Annunciator System	1	
3641.3	Reactor Coolant Pressure/Level	1	Instruments used to determine RCS level or pressure
3641.7	Reactor Building Pressure	1	Building pressure sensors to comply with Tech. Specs.
3642	Engineered Safety Features Actuation	1N	Required operable channels
3661	Radiation Monitoring System	1	Portions monitoring release points
3662	Post Accident Monitoring System	1	
3663	Seismic Monitoring System	1	
3664	Containment Monitoring System	1	Containment temperature
3668	Stack Monitor	1	Release point monitoring
3669	Meteorological Station	1	
3680	Fire Detection Systems	See below	
3680.1	Fire Detection - Reactor Building	1	
3680.2	Fire Detection - Control Building	1	
3680.3	Fire Detection - Auxiliary Building	1	
3680.4	Fire Detection - Control Area Building	1	
3680.5	Fire Detection - Diesel Generator Building	1	

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System	Name	QCL	Comments
3680.6	Fire Detection - River Water Pumphouse	1	
3680.7	Fire Detection - Fuel Handling Building	1	
3680.8	Fire Detection - Air Intake Tunnel	1	
3690	Security Systems	See below	
3690.1	Security - Access Control System	1	
3690.2	Security - Video System	1	
3690.3	Security - Lighting System	1	
3690.4	Security - Permalert System	1	
3690.5	Security - Communication System	1	
3690.7	Security - Electrical	1	
3690.8	Security - Gate Control System	1	
3690.10	Security - Ingress/Egress Control	1	
3690.15	Security - Fire Protection System	1	
3702.1	4160V Switchgear Room - Class 1E	1N	
3703.1	480V Switchgear Room - Class 1E	1N	
3732.7	4160 AC ESF Bus 2-1E	1N	
3732.8	4160 AC ESF Bus 2-2E	1N	
3732.9	4160 AC ESF Bus 2-3E	1N	
3732.10	4160 AC ESF Bus 2-4E	1N	
3732.15	4160V AC Diesel Generator Bus 2DG-1	1N	
3732.16	4160V AC Diesel Generator Bus 2DG-2	1N	
3733.7	480V AC ESF Unit/SS Bus 2-11E	1N	
3733.8	480V AC ESF Unit/SS Bus 2-12E	1N	
3733.9	480V AC ESF Unit/SS Bus 2-21E	1N	
3733.10	480V AC ESF Unit/SS Bus 2-22E	1N	
3733.15	480V AC River Water Pumphouse ESF Unit/SS Bus 2-31E	1N	
3733.16	480V AC River Water Pumphouse ESF Unit/SS Bus 2-41E	1N	
3733.27	480 USS 2-38	1	
3733.28	480 USS 2-48	1	
3733.29	480 MCC 2-33A	1	
3733.30	480V Cap Gun No. 3 Distribution Center	1	
3733.35	480V Power Distribution Panel PDP-6A	1	
3733.36	480V Power Distribution Panel PDP-W1	1	

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System	Name	QCL	Comments
3733.37	480V Power Distribution Panel PDP-M2	1	
3733.38	480V Power Distribution Panel PDP-M3	1	
3733.39	480V Power Distribution Panel PDP-41B	1	
3733.40	480V Solid Waste Distribution Panel	1	
3733.41	480V Strip Heater Panel SPC-PNL-4	1	
3733.43	480-240V Transformer for Pump WG-P-2	1	
3733.44	480-240V Transformer for Pump SWS-P-1	1	
3733.47	480-120/208V Transformer for PNL MP2-33A	1	
3733.48	480-120/208V Transformer for PNL MP-CN-1	1	
3733.49	480-120/208V Transformer for PNL MP-CN-2	1	
3733.50	480-120/208V Transformer for PNL-MPF-1	1	
3733.51	480-120/208V Transformer for PNL MPH-1	1	
3733.52	480-120/208V Transformer for PNL MPT-1C	1	
3733.53	480-120/208V Transformer for PNL HT-P-100	1	
3734	125/250 Volt DC System	See below	
3734.1	125/250V DC Main Bus 2-1DC	1N	
3734.1.1	125/250V DC Dist Panel DCA-1A	1N	
3734.1.2	125/250V DC Dist Panel DCC-1A	1N	
3734.1.4	125/250V DC Dist Panel DCW-1A	1N	
3734.1.5	125/250V DC Dist Panel DCC-1B	1N	
3734.2	125/250V DC Main Bus 2-2DC	1N	
3734.2.1	125/250V DC Dist Panel DCA-2A	1N	
3734.2.2	125/250V DC Dist Panel DCC-2A	1N	
3734.2.4	125/250V DC Dist Panel DCW-2A	1N	
3734.2.5	125/250V DC Dist Panel DCC-2B	1N	
3735	120 Volt AC Vital Power Supply	See below	
3735.1	120V Vital AC Dist Panel 2-1V	1N	
3735.2	120V Vital AC Dist Panel 2-2V	1N	
3735.3	120V Vital AC Dist Panel 2-3V	1N	
3735.4	120V Vital AC Dist Panel 2-4V	1N	
3737	120/208 Volt AC Power System	See below	
3737.1	120/208V AC Distribution Panel MP2-11EB	1N	

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System	Name	QCL	Comments
3737.2	120/208V AC Distribution Panel MP2-21EB	1N	
3737.3	120/208V AC Distribution Panel MP2-31E	1N	
3737.4	120/208V AC Distribution Panel MP2-41E	1N	
3737.7	120/208V Miscellaneous Power Panel MP2-33A	1	
3737.8	120/208V Miscellaneous Power Panel MP-CN-1	1	
3737.9	120/208V Miscellaneous Power Panel MP-CN-2	1	
3737.10	120/208V Miscellaneous Power Panel MP-CN-3	1	
3737.11	120/208V Miscellaneous Power Panel MPF-1	1	
3737.12	120/208V Miscellaneous Power Panel MPH-1	1	
3737.13	120/208V Miscellaneous Power Panel MPT-1C	1	
3737.14	120/208V Miscellaneous Power Panel HT-P-100	1	
3738.1	277/480 Volt AC Dist Panel PDP-1E	1N	
3738.2	277/480 Volt AC Dist Panel PDP-2E	1N	
3741	Emergency Diesel Generators	1N	Electrical Aspects
3753	Electrical Heat Tracing (1E Portion)	1N	Only portions on operable systems
3761	Engineered Safeguards and Emergency Lighting	1N	Control Building Only
3771.1	Conduit Class 1E	1N	Only portions within operable required circuits
3772.1	Cable Tray - Class 1E	1N	Only portions which are carrying required operable class (1E circuits)
3773	Underground Duct Banks - Class 1E	1N	
3774	Containment Building Penetrations	1N	Does not include Recovery added penetrations which are designated as 1
3775.1	Wall Openings and Fire Stops	1N	For class 1E Components
3775.2	Recovery Added Fire Stops	1	
3776.1	Raceway Supports - Class 1E	1N	Only portions which are carrying required operable Class 1E circuits
3777	Class 1E Supply for MDHR/ADH Code Break Viv.	1N	
3810	Fire Protection and Suppression Systems	1	
3813	Fire Protection for Auxiliary Transformers	1	
3814	Fire Protection (Misc. Buildings)	1	

System	Name	QCL	Comments
3815	Filtration System Fire Protection	1	
3824	Reactor Building Ventilation and Purge	See below	
	a. Containment penetrations and isolation valves	1N	
	b. Exhaust outside containment up to and including exhaust filters	1	
	c. Supply from intake tunnel to quick closing damper	1	
3824.1	Ventilation for Decay Heat Pits	1	
3826	Control Room HVAC	1N	
3829	Auxiliary Building H and V	1	Supply from intake tunnel to quick close damper. All exhaust.
3830	Fuel Handling Building H and V	1	Supply from intake tunnel to quick close damper. All exhaust.
3831	Emergency Diesel Generator Building H and V	1N	
3833	Chem. Lab Trailer Filter Exhaust	1	
3834	MDHR Ventilation	1	
3835	Ventilation for Temporary Nuclear Sampling	1	
3837	Service Building Soiled Exhaust	1	
3838	River Water Pumphouse H and V	1N	
3840	Fire Pump House H and V	1	
3841	Chemical Cleaning Building H and V	1	
3845	Mechanical Equipment Room H and V	1N	Control Building
3851	Service Air	1N	Containment penetration and cont. isolation valves only.
3854	Nuclear Plant Nitrogen	1N	Containment penetration and cont. isolation valves only.
3861	Emerg. Diesel Generators	1N	Mechanical
3862.1	Emerg. Diesel Gen. DG-1, Air Intake/Exhaust	1N	
3861.2	Emerg. Diesel Gen. DG-2, Air Intake/Exhaust	1N	
3862	Emerg. Diesel Gen. Fuel	1N	
3863	Emerg. Diesel Gen. Lube Oil, Oil Invection, Air Start	1N	
3864	Emerg. Diesel Gen. Protective Trip Functions	1N	
3882	Reactor Building Polar Crane	1	Structural Only
3883	Fuel Handling Building Crane	1	Structural Only
3909	Containment ILRT Valves	1N	Penetrations R571A and R571D
3910	Reg. Guide 1.29 Supports		Within QCL listed systems

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EXHIBIT 2

PCR NUMBER	SYSTEM NUMBER	QCL CHANGE