January 14, 1992

Docket No. 50-320

Dr. Robert L. Long
Director, Corporate Services/
Director, TMI-2
GPU Nuclear Corporation
Post Office Box 480
Middletown, Pennsylvania 17057

Dear Dr. Long:

SUBJECT: NRC STAFF REQUEST FOR ADDITIONAL INFORMATION ON PROPOSED TMI-2 POST-DEFUELING MONITORED STORAGE QUALITY ASSURANCE PLAN (TAC NO. M81946)

The Post-Defueling Monitored Storage (PDMS) Quality Assurance Plan was received by the NRC as an attachment to a letter from F. Standerfer dated August 25, 1988. During the course of our review of your PDMS Quality Assurance Plan we have identified suggested changes in wording and the need for additional information. The NRC Staff's comments and requests for additional information are contained in the enclosure.

After reviewing the enclosed comments, please determine if a meeting is necessary for clarification of any of the items listed. If you feel that no meeting is necessary then we request that you respond, by letter, to our comments or our request for additional information within 90 days of receipt of this letter.

This requirement affects nine or fewer respondent(s) and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,
/S/
Michael T. Masnik, Senior Project Manager
Non-Power Reactors, Decommissioning and
Environmental Project Directorate
Division of Advanced Reactors
and Special Projects
Office of Nuclear Reactor Regulation

Enclosure:
As Stated

cc w/enclosure:
See next page

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ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION

TMI-2 PDMS QUALITY ASSURANCE PLAN

1. The third paragraph of the PDMS quality assurance (QA) plan (1000-PLN-7200.04, Revision 0) states the plan "should" be applied to certain activities. Section 3.3 of the plan indicates that design control procedures "may" address certain activities. Since the plan is incorporated into the PDMS Safety Analysis by reference, change "should" and "may" to "shall" or justify not doing so.

2. Provide a copy of (or a docketed reference to) the proposed GPUN Organization Charts for PDMS showing organizational entities both onsite and offsite. (1A5)[1]

3. Provide a copy of (or a docketed reference to) the proposed GPUN Organization Plan for PDMS. (1A6, 1B3, 1B6, 3B, 4B1, 5A, 7A1, BA, 9A2, 12.2, 12.31, 14.4, 15.2, 16.1, 16.2, 17.2)[2]

4. Describe the criteria for determining the size of the PDMS QA organization (including the onsite inspection staff). (1A5, 1B6)

5. Identify and describe the position responsible for managing the PDMS QA organization. Describe the qualification requirements for this position. (1B1, 1C2)

6. Discuss the stop-work authority of PDMS verifiers. (1B4)

7. Clarify whether computer codes with an importance to safety will be used during the PDMS. If so, discuss their controls. (2A1.c, 3B, 3C1, 3E4, 1BA4.g)

B. Discuss the compliance of the PDMS QA program with industry QA standards such as N45.2 and its "daughter" standards, NQA-1 and NQA-2, or other. (2B3)

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1. Alpha-numeric designations in parentheses refer to the applicable acceptance criteria in Section 17.1 of the Standard Review Plan (NUREG-0800).

2. The Organization Plan should be responsive to each of these SRP references. OA2. 12/2.

9. Clarify whether there will be an annual assessment of the PDMS QA program by GPUN management above or outside the QA organization. If so, describe it. If not, provide justification. (2C1)

10. Discuss whether drawings will continue to show actual plant configuration during PDMS. (6C1)

11. Describe measures for altering the sequence of tests, inspections, and other activities important to safety during the PDMS. Clarify whether such actions are subject to the same controls as the original review and approval. (14.3)