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US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Three Mile Island Nuclear Station Unit 2 (TMI-2)
Operating License DPR-73
Docket No. 50-320
Response to NRC Request for Additional
Information dated January 14, 1992

REFERENCE: Letter, Michael T. Masnik, NRR, to Dr. Robert L. Long, GPU Nuclear Corporation, "NRC Staff Request for Additional Information on Proposed TMI-2 Post-Defueling Monitored Storage Quality Assurance Plan," January 14, 1992.

Dear Sir:

The referenced letter contained NRC Staff comments and requests for additional information on the Post-Defueling Monitored Storage (PDMS) Quality Assurance Plan (QAP). The attachment to this letter provides a response to each request for additional information contained in the referenced letter.

Our responses are based on the expected condition of TMI-2 upon entry into PDMS and for the duration of PDMS. That is, the plant will be in a safe, stable condition that poses no risk to the health and safety of the public. There is no potential for a nuclear criticality. Demonstration of that fact was contained in the TMI-2 Defueling Completion Report (DCR) which justified the transition from Facility Mode 1 to Facility Mode 2. The subject of assured subcriticality is being reaffirmed based on the final Post-Defueling Survey Report results and analysis and is not an issue for TMI-2 in PDMS.

4, Encl

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During the PDMS period, GPUN will be licensed under 10 CFR 50 to "possess but not operate" the TMI-2 facility. Since the plant will be in a non-operating and defueled status and there will be no structures, systems, or components that perform a safety function, the quality assurance (QA) requirements of US Nuclear Regulatory Commission 10 CFR 50, Appendix B, do not specifically apply. The PDMS QAP was developed specifically to provide TMI-2 with a limited scope PDMS QA Program based on guidelines similar to the Appendix B requirements.

In the request for additional information, reference is made to "applicable acceptance criteria in Section 17.1 of the Standard Review Plan (NUREG-0800)." Further, it is stated that the organization plan should be responsive to the Standard Review Plan (SRP) references. However, since the SRP acceptance criteria do not apply to TMI-2 in PDMS by virtue of the non-operating and defueled status of the plant, GPU Nuclear does not intend to reconcile the PDMS QA Plan with the SRP or incorporate SRP requirements into the PDMS Safety Analysis Report (SAR) discussion of the PDMS organization.

Please contact me if you have any questions.

Sincerely,

Robert L. Long

R. L. Long
Director, Corporate Services/TMI-2

eds/dlb

Attachment

cc: T. T. Martin - Regional Administrator, Region I
M. T. Masnik - Project Manager, PDNP Directorate
L. H. Thonus - Project Manager, TMI
F. T. Young - Senior Resident Inspector

ATTACHMENT

REQUEST FOR ADDITIONAL INFORMATION

TMI-2 PDMS QUALITY ASSURANCE PLAN

1. **NRC Request:** 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.

   GPU Nuclear Response: The word "should" in the third paragraph of the PDMS QA Plan will be changed to "shall."

   The word "may" in Section 3.3 of the Plan will not be changed to "shall." The word "shall" in the context of Section 3.3 could be interpreted as requiring procedures to be maintained to address all design activities stated in subsequent subsections of the plan. However, it is anticipated that the reduced level of effort in TMI-2 during PDMS will involve little or no design changes; hence, it is not necessary to maintain procedures which address all aspects of design control and the word "may" is appropriate. If design activities are performed during PDMS, those specific activities will be controlled by procedures to the extent appropriate to assure compliance to Section 2 of the Plan. This is the intent of the opening sentence of Section 3.3: "To the extent necessary, design control measures shall be implemented by controlled written procedures."

2. **NRC Request:** 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]

   GPU Nuclear Response: The proposed PDMS organization was provided in Chapter 10 of the PDMS Safety Analysis Report. The PDMS QA Plan does not specify organizational requirements but does reference the GPUN Organization Chart, GPUN Organization Plan, and the TMI-2 PDMS Technical Specifications. These referenced documents are controlled by other existing GPU Nuclear directives.

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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).

3. **NRC Request:** Provide a copy of (or a docketed reference to) the proposed GPUN Organization Plan for PDMS. (1A6, 1B3, 1B6, 3B, 4B1, 5A, 7A1, 8A, 9A2, 12.2, 12.31, 14.4, 15.2, 16.1, 16.2, 17.2)[2]

GPU Nuclear Response: See Response 2 above.

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

GPU Nuclear Response: During PDMS, there will be no separate and distinct "PDMS QA Organization." QA coverage of TMI-2 activities during PDMS will be provided by the existing site QA organization as will other functional support activities (e.g., radiological controls, security). Since the level of activity is expected to be minimal during PDMS, the need for QC inspection support and QA monitoring is expected to be low. QA audits of the activities and organizations required by the TMI-2 PDMS Technical Specifications will continue to be conducted and will provide the primary QA oversight of TMI-2 during PDMS.

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

GPU Nuclear Response: As stated in Response 4, QA coverage for PDMS activities will be provided by the existing site QA organization. As stated in Section 2.14 of the Plan, the Director, QA is the position responsible for management of the QA organization. The qualification requirements for this position are contained in the GPUNC Operational Quality Assurance Plan.

6. **NRC Request:** Discuss the stop-work authority of PDMS verifiers. (1B4)

GPU Nuclear Response: Since there will be no TMI-2 structures, systems, or components that provide a safety-related function during PDMS and the level of any activity is expected to be minimal, a formal "stop work" provision was not included in the Plan. However, the Plan does provide sufficient control in this area: Section 15.4 states that "Measures shall be established to procedurally control further processing, delivery, or installation of a nonconforming item or a continuation of a nonconforming service or activity, pending a decision on its disposition." The procedural controls that would be utilized are contained in corporate administrative procedures covering material nonconformances and quality deficiencies.

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

7. **NRC Request:** Clarify whether computer codes with an importance to safety will be used during the PDMS. If so, discuss their controls. (2A1.o, 3B, 3C1, 3E4, 18A4.g)

GPU Nuclear Response: No Important-to-Safety computer codes that are applicable solely to TMI-2 are expected to be developed during PDMS. Some computer codes applicable to both TMI-1 and TMI-2 may be utilized during PDMS (e.g., dose calculation and isotopic quantification) but such codes will be subject to controls as required by the GPUNC Operational QA Plan.

8. **NRC Request:** 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)

GPU Nuclear Response: The PDMS QA Plan does not commit to N45.2, N18.7, or other industry QA standards. Since the plant will be in a non-operating and defueled state, there will no longer be any structures, systems, or components that perform a safety function. Therefore, the requirements of 10 CFR 50, Appendix B, do not specifically apply, nor do the industry standards that were intended to address plants that are operating or under construction.

There are organizations whose personnel and functional activities apply to both TMI-1 and TMI-2; for example, Quality Assurance, Security, Radiological Controls, and Radwaste Management. The personnel and activities of these groups will continue to comply with the more stringent requirements of the GPUNC Operational QA Plan, including its specific commitments to industry standards.

9. **NRC Request:** 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)

GPU Nuclear Response: Annual assessments of the PDMS QA program by organizations outside of QA are not warranted due to the reduced level of activities expected during PDMS. Management awareness of QA program effectiveness will be provided on an ongoing basis through distribution of QA audit reports and by the independent review of these reports by the IOSRG as provided by PDMS Technical Specification 6.5.3.2.

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

GPU Nuclear Response: Control Room drawings (e.g., mechanical flow diagrams, electrical one-line diagrams, piping and instrumentation diagrams) will continue to show actual plant configuration. Other drawings may have corrections posted in the Drawing Related Document List (DRDL) or other similar system to reconcile the drawings to actual plant configuration in lieu of revising the drawings.

11. NRC Request: 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 control as the original review and approval. (14.3)

GPU Nuclear Response: There will be no Important-To-Safety activities during PDMS. However, appropriate controls will be applied to tests, inspections, and other activities in TMI-2 during PDMS as provided in Sections 10 and 11 of the Plan. Changes to test or inspection requirements will be subject to review by the originating group as stated in Section 6.2.2 of the Plan.