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Metropolitan Edison Company Reading, Penn. 19603 Mr. R.C. Arnold	3-25-74	3-27-74	X			

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A. Giambusso	1 signed			

CLASS	UNCLASS	PROP INFO	INPUT	NO CYS REC'D	DOCKET NO:
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DESCRIPTION:
Ltr trans the following...

ENCLOSURES:
Information concerning Operational Quality Assurance Plan, App. 1A, which will be submitted as an amendment to the FSAR.

ACKNOWLEDGED

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Regulatory File

METROPOLITAN EDISON COMPANY

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603 TELEPHONE 215 – 929-3601

March 25, 1974

Mr. A. Giambusso
Deputy Director for Reactor Projects
Office of Regulation
U. S. Atomic Energy Commission
Washington, DC 20545

Dear Mr. Giambusso:

Subject: Three Mile Island Nuclear Station
Unit 1
Docket No. 50-289

Attached are one original and 20 copies of information which will be included as an amendment to the Three Mile Island Unit 1 FSAR to modify the Operational Quality Assurance Plan, Appendix 1A. This information is submitted to resolve objections in the previous filing noted in Mr. Schwencer's letter of March 12, 1974. The amendment has been prepared, is being printed, and will be submitted shortly.

Sincerely,

R. C. ARNOLD
Vice President

RCA:RSB:lw
Attachments

cc: J. P. O'Reilly
W. A. Verrochi

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Manager-Operational Quality Assurance

The Manager-Operational Quality Assurance, who reports to the Vice President-Generation, has the responsibility for ensuring the detailed development, direction, and overall coordination of operational quality assurance activities for Three Mile Island Nuclear Generating Station Unit 1 which covers all activities affecting quality, including operations, inservice inspection, maintenance, refueling, modifications, engineering support, and procurement for the Three Mile Island Nuclear Generating Station Unit 1. The Manager-Operational Quality Assurance has the authority and organizational freedom to identify quality problems and provide solutions.

In the detailed implementation of this program, the Manager-Operational Quality Assurance will coordinate with the GPU Service Corporation Manager of Quality Assurance. This coordination is to ensure that all GPU companies employ the same basic approach to operational quality assurance programs and procedures in the interest of standardization and multi-plant use where feasible.

Specific responsibilities of the Manager-Operational Quality Assurance include the following items:

1. Development and implementation of the Operating Quality Assurance Program and changes thereto.

2. Maintenance of Operational Quality Assurance organization in accordance with the Operational Quality Assurance Program.

3. Development and implementation of a quality assurance training program for quality assurance personnel. He also ensures that quality assurance indoctrination is provided to appropriate personnel outside of the quality assurance organization.

4. Supervision and direction of generation department staff quality assurance engineers and the site quality assurance organization under the site Quality Control Supervisor.

5. Approval or concurrence with Metropolitan Edison Company and vendor quality assurance and quality control documents (such as NDE and special process procedures) in accordance with this Quality Assurance Plan.

6. Concurrence, from a quality assurance standpoint, with design and engineering documents such as specifications, drawings, and installation requirements used for equipment or site work.

7. Concurrence with the Quality Assurance Systems List.

8. Review and approval of audit and surveillance schedules, supervision of the planning for audits and surveillance, review of results of audits and surveillance, and ensuring of follow-up correction of nonconformances.

Station Superintendent

The Station Superintendent is directly responsible for the safe operation of Three Mile Island Nuclear Generating Station Unit 1. His specific responsibilities include the following:

1. Operating the Three Mile Island Nuclear Generating Station Unit 1 in compliance with the requirements of the operating license including Technical Specifications and this Operating Quality Assurance Plan.

2. Initiating corrective action (including shutdown of the unit as required by the Technical Specifications) when operations are not being conducted in accordance with the requirements contained in item "1" above.

3. Ensuring that conditions adverse to quality, when identified, are corrected for all activities involving operations, maintenance, repair, refueling, testing, and site engineering.

4. Approving and implementing station administration, operation, testing, repair, maintenance, refueling, health physics, environmental, and emergency procedures as required by the Technical Specifications, Section 15.6.1 and 15.6.2.

5. Ensuring that modifications to structures, components, and systems are properly coordinated and that necessary safety precautions; e.g., tag outs, draining of systems, designation of exclusion areas, etc., are performed in accordance with written procedures.

6. Ensuring that plant purchase requisitions are prepared using approved specifications which have received required quality assurance and engineering reviews.

7. Ensuring that station staff training and qualifications are maintained.

8. Ensuring inservice inspections are performed as required.

The Station Superintendent is assisted in carrying out the above responsibilities by the Station Engineer, the Maintenance Supervisor, and the Operations Supervisor, and their staffs. The organization, responsibilities, and qualifications of the station staff are specified in station procedures.

Manager-Generation Engineering

The Manager-Generation Engineering reports to the Vice President-Generation and has the responsibility for the detailed development, direction, and overall coordination of engineering activities for the Three Mile Island Nuclear Generating Station Unit 1. This includes modifications, engineering support, and procurement for the station. The Manager-Generation Engineering is responsible for providing technical support to other Generation Department groups, including Station Superintendents.

II. Quality Assurance Program

This program is applied to the safety related items of the Three Mile Island Nuclear Generating Station Unit 1 that prevent or mitigate the consequences of postulated accidents which could cause undue risk to the health and safety of the public. A summary of structures and systems covered in whole or in part by this program are identified in Attachment A. The actual boundaries of these systems and structures will be specified in the Quality Assurance Systems Lists. The Manager-Generation Engineering, with concurrence of the Manager-Operational Quality Assurance, is responsible for development of this list.

The Manager-Operational Quality Assurance has the direct responsibility for ensuring that this Operating Quality Assurance Program is implemented and that it provides for control of all activities affecting quality on nuclear safety related items. He is also responsible for ensuring that the program is modified and updated as standards, regulations, results, and experience dictate. The various groups involved in the Operational Quality Assurance Program, and their responsibilities, are described in Section I of this Plan.

The Operating Quality Assurance Program is described by written policy, plan, and procedure documents. The basic company policy is established by the President in his Policy Statement. This Operating Quality Assurance Plan is issued by the Vice President-Generation. The procedures, which are the Operating Quality Assurance Program's detailed requirements, are originated and approved as shown in Attachment B to this plan, Quality Assurance Program Procedure Categories and Approvals.

An outline of the quality assurance procedures to be used to implement the Operating Quality Assurance Program is included in Attachment C to this plan.

The Manager-Operational Quality Assurance is responsible for maintaining a comprehensive training program for both the original and refresher training of personnel in the Operating Quality Assurance Staff. He also ensures that quality assurance indoctrination is given to Generation Department personnel who are not in the Operating Quality Assurance Staff but whose job responsibility will affect quality. The training program shall comply with Regulatory Guide 1.8 (March 1971) and Regulatory Guide 1.58 (August 1973) including applicable requirements of ANSI N45.2.6-1973 and shall consist of lectures, formal schools, job experience, and individual study, as appropriate.

Each manager maintains formal training programs and procedures to ensure the proper job related training and qualification of his personnel. The Station Superintendent is responsible for the indoctrination and training of plant staff personnel performing activities affecting quality or operations, and for ensuring that, where required by FSAR Section 15.6.1, operators are formally licensed or qualified.

All contractors who perform engineering, construction, or other technical services on structures, components, or systems are required to meet those portions of the AEC Regulation 10CFR50, Appendix B, which are applicable to their services and the materials and equipment which they supply. The Manager-Generation

Engineering is responsible for ensuring that these requirements are contained in the specifications and purchase documents as appropriate along with the quality assurance safety class of the component or system involved.

The Operating Quality Assurance Program requires that the Vice President-Generation performs a management review, at least every two years, of the effectiveness of the Operating Quality Assurance Program. The Vice President-Generation will utilize a group independent of the Operational Quality Assurance Group to perform these reviews or audits. Additional audits and reviews of selected portions (e.g., abnormal occurences, violations of Technical Specifications, tests, experiments, etc.) of the Operating Quality Assurance Program will be performed by PORC, GORB, and/or the offsite technical staff in accordance with Section 15.6.1 of the FSAR.

Metropolitan Edison Company will comply with American National Standards N18.7-1972 and N45.2-1971 and Regulatory Guides 1.33 (November 1972), 1.8 (March 1971), and 1.58 (August 1973), as well as other guides published in the booklet "Guidance on Operational Quality Assurance Requirements During the Operations Phase of Nuclear Power Plants" (October 1973). It is the policy of Metropolitan Edison Company to review revisions of the aforementioned documents and included referenced standards for applicability and incorporation into the Quality Assurance Program.

III. Design, Modification, Maintenance, and Repair Control

A. Design and Modification

The Manager-Generation Engineering is responsible for controlling design work and administering design control activities (including design interfaces) for the modification of nuclear safety related structures, components, and systems. These activities shall comply with Regulatory Guide 1.64 (October 1973) and the applicable requirements of ANSI N45.2.11 (Draft-May 1973).

The Manager-Generation Engineering is responsible for the preparation of the Quality Assurance Systems List. The Manager-Operational Quality Assurance is responsible for reviewing the Quality Assurance Systems List for concurrence on quality assurance aspects. The Quality Assurance Systems List is a list of those systems which are within the scope of this Quality Assurance Plan.

Design control is implemented by means of Generation Engineering Procedures which include: design considerations; design review requirements; internal and external interface control considerations; and design document review, approval, distribution, control, and revision requirements. Design considerations include, as appropriate: physics, stress, materials, thermal hydraulic, radiation and accident analysis; appropriate design bases, codes, standards, and regulations; acceptance and rejection criteria; and quality assurance/quality control. Design verification includes the use of formal design reviews, checks or tests as appropriate to ensure the adequacy of the design with regard to design considerations. Design reviews may be conducted by means of the same, an alternate, or a simplified calculational method or by the performance of a suitable testing program. A design review will be performed by an individual or group other than the individual or group who performed the original design, but who may be from the same organization.

The Manager-Generation Engineering is responsible for ensuring that design control procedures, whether the work is done by Metropolitan Edison Company or by other organizations, are prepared and implemented and incorporate appropriate design control practices, checks, and reviews. Among other things, satisfactory design control requires that an independent design verification is performed.

Proposed plant modification packages and their implementation are the responsibility of the Manager-Generation Engineering and controlled by means of written Generation Engineering procedures. This coordination includes the necessary interface with the Station Staff in regard to station scheduling, station procedure preparation and approval, Plant Operations Review Committee and General Office Review Board review and approval, etc. Proposed station modifications are reviewed and approved by the Plant Operations Review Committee and the General Office Review Board, prior to their implementation, when required by the Technical Specifications, Section 6.1.

The Manager-Generation Engineering is responsible for the timely approval and updating of specifications and drawings, as well as changes or deviations thereto, utilized for purchase or installation of materials, parts, or components. Any other design documents, specifications, drawings, installation requirements, and changes thereto, are approved in the same manner.

IV. Procurement Document Control

Procurement document control applies to the control of procurement documents for materials, parts, components, and services required to perform design, maintenance, repair, modification, operation, test, refueling, inservice inspection, and quality assurance functions. Such documents may be prepared by Metropolitan Edison Company or by a design contractor or agent and include purchase requisitions, purchase orders, service agreements and invoked specifications, drawings, etc. In any case, the procurement document preparation shall comply with ANSI N45.2-1971 and the applicable requirements of ANSI N45.2.13 (Draft-May 1973).

Procurement documents prepared by or for the Generation Division shall be prepared, reviewed, approved, revised, and controlled in accordance with the Generation Division procedures "Procurement Document Control." The preparation, review, and approval of engineering procedures is the responsibility of the Manager-Generation Engineering. It requires that, in the preparation of procurement documents, consideration be given to at least the items listed in Table IV-1.

Procurements of materials, parts, or components are initiated by purchase requisitions prepared by the station staff or by others in the Generation Division. The Generation Division procurement procedures require that an organization preparing a requisition ensures that all applicable items listed in Table IV-1 are considered and included as appropriate in the requisition, invoked specifications, or drawings.

For station initiated purchase requisitions, the Station Superintendent is responsible for the determination of the system or component safety class in accordance with the Quality Assurance Systems List. If the classification is unclear, he contacts Generation Engineering for resolution. For items within the scope of this Quality Assurance Plan, purchase requisitions and invoked requirements are to be reviewed for concurrence by the site Quality Control Supervisor. Further, if the requirements invoked by the purchase requisition are not taken from current approved Generation Engineering specifications or drawings, then Generation Engineering approval of the requisition and invoked requirements is required.

For cases where requisitions are not prepared by the station, the requisition and invoked requirements, including specifications prepared by outside organizations, must be reviewed for concurrence by the Generation Engineering and Operational Quality Assurance staffs.

After puchase requisitions have received the required approvals and concurrences described above, they are converted to purchase orders and selection of vendors is controlled as described in Criterion VII. It should be noted that under no circumstances will purchase requisition requirements be altered (except for pricing and quantity) during order placement unless review and concurrence is obtained from those who were originally required to review, concur with, and approve the requisition as described above.

VI. Document Control

A standard Generation Division procedure for document control includes basic generic controls which are to be incorporated into specific written procedures by each manager and the Station Superintendent for use by himself and his staff. The basic procedure is prepared in accordance with this Operational Quality Assurance Plan and approved by the Vice President-Generation. Each Manager and the Station Superintendent are responsible for the preparation, approval, and implementation of his group's procedure in accordance with the requirements of the Generation Division procedure.

The Generation Division document control procedure requires that documents be controlled as appropriate considering the type of document involved and its importance to safety. Accordingly, it specifies the types of documents which must be controlled; identifies the difference between controlled and uncontrolled copies of the same document; includes the method for identifying holders of controlled copies; requires that only controlled copies of a document be used for official purposes; requires lists of effective revisions be issued periodically; requires distribution lists for the documents to be maintained by the distributors; requires that distributors transmit controlled documents using Generation Division forms internally and approved forms externally; and requires holders of controlled copies of documents to assume responsibility for the document and revisions as well as to certify that the document and/or revisions are entered and implemented. Types of documents which are controlled to various degrees include Technical Specifications, FSAR, Quality Assurance Plan, procedures (such as, quality assurance, operation, repair, maintenance, health physics, fuel handling, modification, administrative, and environmental procedures), specifications, drawings, inspection and test results, procurement documents, quality assurance records, and nonconformance and corrective action documentation.

The Generation Division document control procedure further requires that each Manager and the Station Superintendent provide in their procedures for measures: to ensure documents are available when required; to properly review and approve documents such as procedures, instructions, specifications, drawings, etc.; to provide the same reviews and approvals for changes to documents as were required of the original document (unless the review and approval authority is delegated by Metropolitan Edison Company to another responsible and qualified organization); to require that review and approval organizations have access to pertinent information and adequate knowledge of the original document intent; to ensure that approved changes be promptly transmitted for incorporation into documents; and to ensure that obsolete or superseded documents are eliminated from the system and not used. Attachments B and D of this plan provide lists of procedure and document categories. These appendices specify review, concurrence, and approval requirements for the included procedures and documents.

The Superintendent of the Three Mile Island Nuclear Generating Station Unit 1 is responsible for the implementation of the document control system for all instructions, procedures, drawings, and other controlled documents received or prepared at the generating station for use in administering, operating, testing, maintaining, and modifying the nuclear safety-related structures, components, and systems. The Superintendent of the TMI Station Unit 1 will ensure that no changes are made to site instructions, procedures, and drawings unless such

IX. Control of Special Processes

For work performed by vendors or by Metropolitan Edison Company, written procedures are established and qualified, as required, for special processes, such as welding, heat treating, cleaning, and nondestructive examination (NDE) to ensure compliance with applicable codes, standards, design specifications, and vendor's requirements. When special processes and qualification requirements are not included in existing codes and standards, they are described in procedures which give details of the special process, the personnel qualification requirements, the equipment necessary, and the special process qualification requirements. The performance of special processes as discussed above shall comply with Regulatory Guides 1.37 (March 1973) and 1.39 (March 1973) and applicable requirements of ANSI N45.2.1-1973 and ANSI N45.2.3-1973.

The Manager-Generation Engineering, the Manager-Generation Maintenance, and the Station Superintendent are responsible for requiring vendors, in procurement documents, to control special processes in accordance with the above requirements. The Manager-Operational Quality Assurance is responsible for quality assurance review and concurrence of procurement documents including review of requirements for control of special processes.

As described above, it is required that special processes be performed in accordance with written procedures. The following reviews and approvals are required for special process procedures submitted by vendors in accordance with procurement document requirements and for all Metropolitan Edison Company special process procedures:

1. Special process procedures other than nondestructive examination procedures are reviewed for concurrence with quality assurance requirements by Operational Quality Assurance and approved by the Manager-Generation Engineering or Manager-Generation Maintenance, as appropriate.

2. Nondestructive examination procedures are approved by the Manager-Operational Quality Assurance. However, if required by applicable codes or standards, he also ensures that the procedures are approved by formally qualified examiners prior to granting his approval.

The Manager-Generation Maintenance and the Station Maintenance Supervisor are responsible for ensuring the personnel performing special processes under their cognizance are qualified and are using qualified procedures in accordance with applicable codes, specifications, and standards. The Manager-Operational Quality Assurance is responsible for the qualifications of NDE personnel and procedures. The Manager-Generation Maintenance, Station Maintenance Supervisor, and the Manager-Operational Quality Assurance maintain records for their personnel and their procedures to demonstrate that required qualifications have been obtained and are maintained current.

The site Operational Quality Assurance staff performs surveillance, inspections, and audits of special processes performed by the plant staff or site contractors to ensure compliance with procedures.

XI. Test Control

Whenever testing is required to demonstrate that a material, part, component, or system will perform satisfactorily in service (whether it be prototype, preoperational, proof, or operational surveillance testing) a test program is instituted employing written and approved procedures which are in accordance with basic requirements established in Technical Specifications, drawings, instructions, procurement documents, requirement documents, specifications, codes, standards, regulatory requirements, etc. The test program provides a means for identification, control, and documentation of all tests and written procedures required for satisfactory accomplishment of the testing. As required by the test, written test procedures and checklists include: necessary test equipment and calibration requirements; material requirements; personnel qualification requirements; prerequisite conditions; environmental conditions; limiting conditions; detailed performance instructions for the testing method including nonconformance control; inspection hold points; acceptance, and rejection criteria; data collection requirements; and documentation approval, retention, and storage requirements.

The Station Superintendent is responsible for the operation and maintenance test programs, including the surveillance test program required by the Technical Specifications, Section 4. The test programs and procedures are prepared by station staff, reviewed by the Plant Operations Review Committee when required by Technical Specifications, and approved by the Station Superintendent. The Station Superintendent is responsible for the performance of the required tests in a correct and timely manner utilizing written and approved procedures. When site contractors are employed for tests, the Station Superintendent is responsible for provisions that require the site contractor to provide a testing program in accordance with this Quality Assurance Plan. He is further responsible for requiring that test results, for which he is responsible, are documented, reviewed, and approved.

The Manager-Generation Engineering is responsible for ensuring that required tests for modifications are specified in procurement documents and/or requirement documents. He is further responsible for assisting the TMI Nuclear Station Unit 1 staff in the preparation of station-related test procedures. The Manager-Generation Engineering is responsible for reviewing, documenting, and approving modification-related test results.

The Manager-Operational Quality Assurance is responsible for the review and concurrence with test requirements, from a quality assurance standpoint, contained in procurement and other requirement documents. The site Quality Control Supervisor is responsible for quality assurance review and concurrence with station tests procedures. The Quality Control Supervisor prepares quality assurance checklists for site modification, repair and maintenance-type tests which define the monitoring, inspection, and checks Operational Quality Assurance personnel will perform.

XIII. Handling, Storage, and Shipping

The Station Superintendent is responsible for developing and implementing general station procedures for the handling, storage, shipping, preservation, and cleaning of material and equipment delivered to or located at Three Mile Island Nuclear Generating Station Unit 1. Under normal circumstances, the manufacturer's specific written instructions and recommendations along with purchase specification requirements (where applicable) will be invoked on cleanliness, preservation, special handling, and storage with respect to environmental requirements. In the absence of, or in addition to, specific manufacturer requirements, the Station Superintendent may invoke additional requirements in accordance with the station procedures.

The Manager-Generation Engineering is responsible for specifying in the procurement documents and in modification requirement documents that written procedures be used as appropriate for the handling, shipping, storage, cleaning, and preservation of materials and equipment procured for modifications. These procedures will be prepared by contractors or by the station staff as appropriate. Procedures not involving the station stores facility will be reviewed and approved by the Manager-Generation Engineering when so specified in the procurement or requirements documents. Procedures involving the station stores facilities will be reviewed and approved by the Station Superintendent. They will also be approved by Manager-Generation Engineering when so specified in the requirement documents.

In the preparation of documents, including procurement documents, station requirement documents, contractor procedures, station procedures, etc., consideration of handling, shipping, storage, cleanliness, and preservation is given to all material and equipment throughout various stages of manufacturing and installation prior to operational acceptance.

The Manager-Operational Quality Assurance is responsible for review and concurrence of pertinent documents and procedures to assure that proper handling, storing, and shipping requirements have been specified. He is further responsible for ensuring proper implementation of handling, shipping, and storage requirements required of vendors. The Quality Control Supervisor is responsible for review and surveillance of handling, storage, and shipping of materials and equipment by vendors, the station staff, and contractors. The performance of activities discussed above shall comply with Regulatory Guide 1.39 (March, 1973) and the applicable requirements of ANSI N45.2.2-1972.

XVII. Quality Assurance Records

The Vice President-Generation is responsible for establishing quality assurance record preparation and maintenance requirements in compliance with the applicable requirements of ANSI N45.2.9 (Draft-January 1973) in the Operational Quality Assurance Plan. Each Manager and the Station Superintendent are responsible for preparation, review, approval by himself, and implementation of specific Quality Assurance Record Procedures for their areas of responsibility in accordance with the Operational Quality Assurance Plan. The records which fall within the quality assurance record requirements include those records required by the Technical Specifications, Section 15.6.5 and ANSI 45.2.9 (Draft-January 1973) (Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants).

The requirements and responsibilities for record transmittal are in accordance with document control procedures as described in Section VI of this Plan. Requirements and responsibilities for preparation, inspection, identification, review, storage, retrieval, maintenance, and retention period of quality assurance records will be in accordance with the applicable quality assurance record procedures, codes, standards, procurement documents, and applicable parts of this Quality Assurance Plan.

Record storage facilities are in accordance with the applicable requirements of ANSI N45.2.9 (Draft-January 1973).

The Station Superintendent is responsible for maintaining plant operating records as required in the Technical Specifications. In addition, he is responsible for maintaining inservice inspection records, special test records, Plant Operations Review Committee Minutes, and General Office Review Board Minutes.

The Manager-Generation Engineering is responsible for providing and implementing procedures for the preparation and maintenance of design records such as specifications, design reports, as-built drawings, etc.

The Manager-Operational Quality Assurance is responsible for providing procedures which ensure the maintenance of records (other than design records and plant operating records) sufficient to furnish objective evidence of activities affecting quality in compliance of the applicable requirements of ANSI N45.2.9 (Draft-January 1973). He is also responsible for ensuring the Operational Quality Assurance Staff reviews, concurs with, and audits all Quality Assurance Records Procedures.

Due to the difference in the above requirements and previous record requirements, the possibility exists that it will be impossible to produce all records, in accordance with this plan, for events that occurred prior to the implementation of this plan. For this reason, it is planned to maintain the existing records and employ the guidelines of the Operating Quality Assurance Plan in the future.

Audit reports are transmitted via the Manager-Operational Quality Assurance to the responsible managers or outside organizations. It is the responsibility of the cognizant manager or the person in the outside organization specifically designated as responsible, to review the audit report and to ensure that corrective action is accomplished in a timely manner. The audit team leader is responsible for timely followup action (including reaudits) as required to ensure corrective action has been taken. Audit findings are documented in the audit report and all corrective action, followup action, and reaudits are documented with reference to the original audit report.

Regular audit team members (usually part of the Operational Quality Assurance staff) are trained in accordance with the quality assurance training program. Members of audit teams, who are not regular auditors, will be indoctrinated or trained sufficiently to perform the specific audits for which they are assigned.

At least once every two years, the Vice President-Generation performs an independent review of the Operational Quality Assurance Program, procedures, and activities. The purpose of this review is to evaluate the effectiveness of the program and to ensure proper compliance with Metropolitan Edison policy and the 10CFR50 Appendix B criteria.

In addition to the above-described audit program, the General Office Review Board conducts special reviews, audits, and investigations as requested by the Company President or as deemed necessary to confirm the adequate functioning of the plant and corporate staff. These audits may be assigned to other qualified persons having no direct line of responsibility for day-to-day operations of the plant, including Metropolitan Edison Company Operational Quality Assurance personnel. To prevent unnecessary duplication, some General Office Review Board audits may also serve to satisfy audits scheduled by the Manager-Operational Quality Assurance. The results of General Office Review Board audits are reported to the Metropolitan Edison Company President, Vice President-Generation, Manager-Operational Quality Assurance, Manager-Generating Stations, Station Superintendent, and others, as appropriate.

The following list of audits is representative of the areas to be audited by the Operational Quality Assurance Organization to assure compliance with the Operational Quality Assurance Program:

I. Generation Division Staff

A. Generation Engineering Staff

1. Design Control (including fuel)
2. Procurement Control
3. Training
4. Document Control
5. Nonconformance/Corrective Action Control
6. Modification Control

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B. Generation Maintenance Staff

1. Document Control
2. Training
3. Procurement Control
4. Maintenance Control (includes Maintenance, Modification, and Repair)
5. Nonconformance/Corrective Action Control
6. Special Process Control (Welding, Heat Treating, etc.)

C. Generation Operations Staff

1. Document Control
2. Training
3. Procurement Control
4. Nonconformance/Corrective Action Control

D. Operational Quality Assurance Staff

1. Audit Control
2. Document Control
3. Training
4. Nonconformance/Corrective Action Control
5. Vendor Surveillance and Inspection

II. Plant

A. TMI Nuclear Station Unit 1 Staff

1. Procedure/Technical Specification Compliance with respect to:

   a. Administrative Functions
   b. Fuel Handling
   c. Operations
   d. Maintenance, Repair, Modification
   e. Design
   f. Health Physics/Chemistry
   g. Environmental Monitoring
   h. Inservice Inspection
   i. Surveillance Testing

2. Document Control
3. Nonconformance/Corrective Action
4. Training
5. Procurement Control
6. Material Handling, Storing, Issuing, Cleaning, Preserving, Shipping Control
7. Calibration
8. Emergency Plan

4. The Vice President-Generation of Metropolitan Edison Company receives a monthly report of the project QA organization activities.

5. The Vice President-Generation receives a copy of a semi-annual report on the activities of the GPUSC QA Department.

6. The Vice President-Generation participates in a management review of the effectiveness of the GPUSC QA programs at least once each calendar year.

7. The Vice President-Generation has line responsibility for the TMI station staff which officially accepts equipment and systems after successful startup and test. The official acceptance involves a review of all documentation related to the equipment or system which is being accepted to verify that the equipment or system is ready for operation and the documentation is complete.

Subsequent to commercial operation of TMI Unit No. 1, the Vice President-Generation may utilize the services of GPUSC to support design, modification, maintenance, repair, procurement, special processes, inspections, and tests. In such instances, the GPUSC personnel will either be integrated into the Metropolitan Edison Company Organization and they will function in the same manner as employees of Metropolitan Edison Company, or Metropolitan Edison Company will establish and implement organizational, administrative, and reporting arrangements equivalent to those described previously for the pre-commercial phase of the project. If the latter arrangement is utilized, the Vice President-Generation will review and approve the Project Organization and Responsibilities Document and the Project QA Plan. He will also ensure that appropriate audits are conducted of the GPUSC QA program.

Consistent with Section 13 of the Final Safety Analysis Report for TMI Unit No. 1, maintenance and system modifications, identified during the conduct of initial testing as being necessary, may be accomplished in accordance with the provision of the GPUSC Start-up and Test Quality Assurance Plan.