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CONTROL NO: 3287

<b>FROM:</b> Metropolitan Edison Company Reading, Pennsylvania 19603 John G. Miller		<b>DATE OF DOC:</b> 5-18-73	<b>DATE REC'D</b> 5-21-73	<b>LTR</b> x	<b>MEMO</b>	<b>RPT</b>	<b>OTHER</b>
<b>TO:</b> R. C. DeYoung		<b>ORIG</b> 1 signed	<b>CC</b> 2	<b>OTHER</b>	<b>SENT AEC PDR</b> <b>SENT LOCAL PDR</b>		
<b>CLASS:</b> <u>U</u> PROP INFO		<b>INPUT</b>	<b>NO CYS REC'D</b> 3	<b>DOCKET NO:</b> 50-289			
<b>DESCRIPTION:</b> Ltr re our 4-17-73 ltr...trans the following:  DIST: Per Mr. Bernero  NOTE: *DENOTES DIST W/ENCLS  PLANT NAMES: Three Mile Island, Unit # 1				<b>ENCLOSURES:</b> (1) Three Mile Island Nuclear Generating Sta. Operating Quality Assurance Plan. (2) Comparison of Three Mile Island Procedures with Safety Guide 33 and ANS 3.2 Requirements.  (3 cys ea encl rec'd) See packet			

FOR ACTION/INFORMATION 5-25-73 fod

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TELEPHONE 215 - 929-3601

May 18, 1973

Regulatory

File Cy.

Mr. R. C. DeYoung  
Assistant Director of  
Pressurized Water Reactors  
Directorate of Licensing  
U.S. Atomic Energy Commission  
Washington, D.C. 20545



Ref: Docket No. 50-289

Dear Sir:

Your letter of April 17, 1973, requested that Metropolitan Edison Company submit a description of the Three Mile Island Nuclear Generating Station Operating Quality Assurance Program and that this program be compared to the guidelines of Regulatory Guide 1.33 (formerly Safety Guide 33). Enclosures 1 and 2, submitted herewith, set forth Metropolitan Edison Company's Operating Quality Assurance Program and makes the requested comparison with Regulatory Guide 1.33.

The TMI Operating Quality Assurance Program is based upon Metropolitan Edison Company's commitment to fulfill the requirements of 10CFR50, Appendix B, ANSI-N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants", ANS-3.2 "Administrative Control for Nuclear Power Plants", and Regulatory Guide 1.33. Many of the procedures, organizational relationships and assignments of responsibility required to comply with these guides and standards have been developed during the past three years as part of the preparations for eventual station operation. In several instances, the formal commitment to requirements now contained in these documents are in the Final Safety Analysis Report which has been previously submitted to the AEC.

Enclosure 1 is a copy of the Three Mile Island Nuclear Generating Station Operating Quality Assurance Plan. This plan was drafted to be consistent with the organization of Appendix B to 10CFR50. It sets forth the organizational relationships and assigns responsibilities for implementing the quality assurance program. Metropolitan Edison Company's corporate commitment to the program and the assignment of basic responsibilities for implementing that commitment are contained in a letter signed by the company president and this letter has been made an integral part of the plan. Since

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May 18, 1973

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Mr. R. C. DeYoung

the Quality Assurance Plan is not in sufficient detail to fully describe Metropolitan Edison Company's implementation of the program, Enclosure 2 has been submitted to provide this information. For Enclosure 2, each procedure contained in Appendix A of Safety Guide 33 which relates to pressurized water reactors has been cross referenced to Metropolitan Edison Company's equivalent procedure. In addition, each section of ANS-3.2 draft No. 8 has been cross referenced to our implementing procedure, the applicable section of our Quality Assurance Plan, or an applicable section of the FSAR. The only exception we are taking to the listed guides and standards, as we understand them, relates to paragraph 5.4 of ANS-3.2. Because of the frequent use which will be made of surveillance testing procedures, the requirement for complete compliance with their detailed steps, the formal mechanisms established for review and approval of proposed changes to these procedures, and the auditing of their use which will be required, it is not believed necessary to have a periodic review of these procedures by the Plant Operations Review Committee.

As we have developed our operating quality assurance program, it has become evident that additional staffing is required, particularly in the home office. Two of the management level positions described in the Operating Quality Assurance Plan, the Manager-Generation Engineering and the Manager-Operational Quality Assurance, have been filled during this month. Their primary objective during the next few months will be to develop the additional detailed procedures needed to fully implement the operating quality assurance program. Pending the completion of these procedures and the filling of additional staff requirements, Metropolitan Edison Company will utilize the services of the General Public Utilities Service Corporation and their contractors as necessary to comply with Appendix B of 10CFR50.

The Manager-Generation Maintenance position was filled in July 1972. Pending the filling of the Manager-Generating Stations position, the Station Superintendent will report directly to the Manager-Generation.

Sincerely yours,

John G. Miller  
Vice President

JGM nh

- Enclosures:
1. Three Mile Island Nuclear Generating Station Operating Quality Assurance Plan
  2. Comparison of Three Mile Island Procedures with Safety Guide 33 and ANS 3.2 Requirements

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cc: Messrs. R. C. Arnold - Met-Ed  
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POOR ORIGINAL

DATE: May 22-73

DOCKET NO. 50-289

TO: Licensing Assistant **Goulbourne**

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