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May 5, 1993  
C311-93-2063

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Dear Sir:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Response to Incident Investigation Team Report - NUREG 1485

GPU Nuclear has reviewed the NRC Incident Investigation Team (IIT) Report contained in NUREG 1485 and NUREG 1485 (SGI). The findings and conclusions relating to GPU Nuclear facilities and operations contained therein are similar to those reached by the GPU Nuclear Site Emergency Review Group (SERG) and we are in general agreement with the IIT. However, there are several issues which warrant GPU Nuclear comment here for purposes of clarity and accuracy of the record. Those issues are summarized in the Attachment.

GPU Nuclear has a number of other areas of concern which do not directly affect the findings and conclusions and we will work with the USNRC Region I to resolve them as well as to achieve closure on issues warranting follow-up action.

I wish to convey our appreciation for the thorough, professional conduct of the NRC review of the February 7, 1993, security incident by the NRC IIT under the leadership of Mr. Samuel J. Collins.

Sincerely,

*P. R. Clark*

P. R. Clark  
President

DVH/mkk

Attachment

9305180176 930505  
PDR ADOCK 05000289  
Q PDR

cc: S. J. Collins - IIT Team Leader  
M. G. Evans - TMI Senior Resident Inspector  
R. W. Hernan - TMI-1 Senior Project Manager  
T. T. Martin - Region I Administrator  
J. M. Taylor - Executive Director for Operations

ADD: NCR/DR33/PEPB

GPU Nuclear Corporation is a subsidiary of General Public Utilities Corporation

## ATTACHMENT 1

### Emergency Response Organization Call-out

The IIT Report and the GPU Nuclear SERG Report both identified as an issue a delay in call-out of the Emergency Response Organization (ERO). The IIT's understanding of the callout process which was implemented on February 7, 1993 resulted, in part, in an IIT conclusion that the TMI response during the early hours of the event was focused almost exclusively on management of the security event with a lack of attention to the potential for radiological consequences (i.e., ERO personnel were not directed to report promptly to the event).

However, there appears to be a conflict between the IIT and SERG Reports concerning the call-out and instructions given to the ERO. The IIT Report states that ERO personnel were initially called and instructed to remain on "standby" at home and were called a second time, beginning at 0905, and instructed to report. The SERG Report documents that, due to an initial lack of access to the automatic callout system, callout of ERO personnel was delayed. Personnel were called individually starting at 0802 and directed to report to the Training Center. ERO personnel began to arrive at the Training Center at 0901. Based on all available data, GPU Nuclear has concluded that the SERG properly determined that a notification of all ERO personnel, with directions to "standby" at home, did not occur. It should be noted that during the callout of ERO personnel, two individuals did call the Control Room and were directed by a management level person, located in the Control Room but not directly involved in the callout, to "standby". Subsequently, both individuals did report to the Training Center.

### Deviations from Procedures and Plans

The IIT Report and the GPU Nuclear SERG Report identified deviations from procedures and plans as an area requiring further review. As stated in LER 93-S01, Supplement 1, GPU Nuclear believes that the deviations were allowable under the provisions of the GPU Nuclear plans and procedures, 10 CFR 50.54(x) and 10 CFR 73.55. In general, deviations during the incident were specifically approved by a person possessing an SRO license, as required by the regulations. However, operating under the belief that specific approval of an SRO had been received, certain deviations to the Modified Amended Physical Security Plan were implemented without SRO approval.

The provisions of 10 CFR 50.54(x) and (y) are incorporated in the GPU Nuclear Emergency Plan and Emergency Plan Implementing Procedures (EPIPs) as they pertain to deviations from license conditions and Technical Specifications. In addition, the Emergency Plan allows the Emergency Director to deviate from procedures that do not affect Technical Specifications or License Conditions without invoking the provision of 10 CFR 50.54(x). The IIT Report, Regulatory Aspects Section, incorrectly states that EPIPs are a part of the Technical Specifications. Although Technical Specifications reference EPIPs, EPIPs are not part of the Technical Specifications.

ATTACHMENT 1 (Cont'd)

Site Security Response

The IIT Report stated that the Licensee's policy to station armed responders outside the Protected Area (PA) may not meet the requirements for immediate response capability. The deployment of the response force during the incident was in accordance with Exhibit 1.2, para 4.7.1 (a) and (b), Revision 28 of the Modified Amended Physical Security Plan. Also, in order to comply with 10 CFR 73.55(h) 4, the location of certain vital systems dictates a requirement to locate an armed responder outside the PA.

Communications

The IIT Report stated that Site Protection Officers improperly used electronic equipment in proximity to the intruder's vehicle before a determination had been made if the vehicle contained an explosive device. Radio communication, made in proximity of the vehicle from behind cover, was determined to be necessary and of immediate importance to the initial response. These actions were consistent with training and guidance received from the 56th EOD.