

Herman Dieckamp
President



GENERAL
PUBLIC
UTILITIES
CORPORATION

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Writer's Direct Dial Number

June 10, 1983

Docket No. 50-289

Chairman Nunzio J. Palladino
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Chairman Palladino:

Recently, the NRC staff stated, "because of all the open issues....the staff can draw no conclusion regarding management integrity at this time". Additionally, the Commonwealth of Pennsylvania's "Supplemental Comments" of June 2, 1983, stated that, "the Commonwealth will not support the restart of TMI-1 until it receives adequate assurances from the Commission that the management of GPU Nuclear Corporation is willing and able to operate the plant in a safe and competent manner".

We have again evaluated the present GPU Nuclear organization to reassure ourselves and to provide a basis for the confidence of others that any inappropriate attitudes or practices of the past have not been carried forward and will not manifest themselves in GPU Nuclear.

We retain confidence in the capability and integrity of the GPU Nuclear organization and personnel. The basis is further evidenced by the in-depth assessment conducted by the Licensing Board, as well as by independent measurements by industry's INPO, NRC's SALP and other inspections and by Licensee's own consultants.

As a preliminary matter, it is useful to review the MetEd organization that was responsible for operation of the TMI Station

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at the time of the accident. No member of MetEd's/TMI senior management is now involved with TMI. Four levels of management, the MetEd president, vice-president, station manager, and both unit managers responsible for TMI at the time of the accident are not with GPU Nuclear. The senior management responsible for operation of TMI-1 today is dramatically different than that which existed at the time of the accident.

In structuring GPU Nuclear we have provided dedicated on site personnel for each of the generating stations with a highly experienced senior manager on site. We have provided experienced managers and staff for a number of centralized support functions such as engineering, health physics, quality assurance, training, maintenance, and construction in order to effectively support the station management. Additionally, the organizational structure was specifically designed to provide inherent checks and balances. GPU Nuclear, its operational philosophy, its senior managers, and numerous other key personnel within the organization were reviewed in depth and endorsed by the ASLB. Over one hundred individuals, including top managers, appeared before that board in public hearings.

A broad look at the elements of GPU Nuclear which will be involved in the operation of TMI-1 reveals that the organization, down through two levels of management below the GPU Nuclear vice presidents, encompassing 86 such positions, contains 16 individuals that were with MetEd prior to the accident. Of the balance, 30 are new employees since the accident and the remaining 40 come from other components of the GPU System. The executive v.p. of GPU Nuclear and the vice president directly responsible for TMI-1 site operations are new.

At the time of restart we expect to utilize 38 currently licensed operators for TMI-1; 25 are newly licensed since the accident. Out of the remaining 13 that were licensed at the time of the accident, 10 are assigned to shift activities. These operators need to be viewed as a source of experience for the safe operation of TMI-1. Their prospective performance must also be assessed in light of (1) the fact that all have been licensed under the new testing criteria, (2) the ability of GPUN to provide 6 shift coverage for TMI-1 which provides one shift out of six for training, (3) the presence of shift technical advisors, and (4) significantly improved procedures.

As further assurance:

- 1) We will, prior to restart, reassign personnel such that no TMI-2 licensed operator will operate TMI-1 (except for the manager of operations who was licensed on Unit 2 but who was evaluated in depth and specifically endorsed by the ASLB), and
- 2) We will, prior to restart, add full time on shift operational quality assurance coverage by degreed engineers until the open issues are resolved. We would defer to the NRC should it wish to provide full time on shift resident inspector coverage of TMI-1 operations.

The balance of the TMI-1 site staff in engineering, maintenance, and supervisory roles contains numerous individuals with prior experience in the operation of TMI-1, experience which is important to the safe operation of TMI-1. The prospective performance of the current TMI-1 site staff must be assessed in light of (1) the evaluation by the ASLB, (2) the NRC's Jan. 1983 SALP and (3) the most recent inspection 50-289/83-10 which found very favorable results in the pervasive management areas of procedures, adherence, discipline, and attitude toward safety.

In order to provide added assurance;

We will reassign personnel such that those functions which provide an overview assessment, analysis, or audit of plant activities specifically;

- General Office Review Board
- Independent On-Site Safety Group
- Shift Technical Advisors
- Q/A Audit
- Q/A and Q/C Site Staff
- Licensing
- Radiation Control
- Emergency Preparedness

will contain only personnel with no pre-accident involvement as exempt employees at TMI-1 or 2. We will continue this constraint until the open issues are effectively resolved.

As a further action to strengthen TMI-1;

We have reallocated the priorities and assignments within the office of the president of GPU Nuclear, which office includes the president and executive vice president, such that TMI-1 will report to the executive vice president and such that he will be able to devote his prime attention to TMI-1 matters.

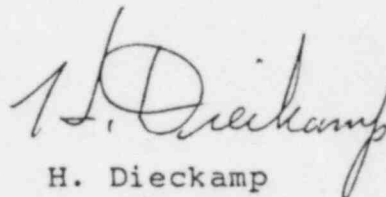
In a letter to Governor Thornburgh we have committed to the actions which we think necessary to satisfy the issues under appeal by the Commonwealth of Pennsylvania. A copy of that letter is attached.

We are taking these steps in order to provide additional assurances during the period necessary to resolve the open issues. We are confident that the actions necessary to provide these added assurances will not detract from the first priority of safe operations.

We will work with your staff to communicate the specifics of these steps.

In closing, we urge the Commission to expeditiously resolve the open issues so as to provide assurance that the learnings of the accident have been identified and implemented. We pledge our cooperation in that effort so that the TMI-1 management and staff can be accorded the full support of the Commission and the public.

Sincerely,



H. Dieckamp

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enclosure

cc: Governor Thornburgh



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100 Interpace Parkway
Parsippany, New Jersey 07054
201 263-6500
TELEX 136-482
Writer's Direct Dial Number

June 10, 1983

The Honorable Richard Thornburgh
State House
Harrisburg, Pennsylvania 17120

Dear Governor Thornburgh:

In your letter of June 2 to Chairman Palladino, you expressed concern about a number of issues relating to the restart of TMI-1 and stated specifically:

"I would find it particularly inappropriate for the Commission to take such action prior to hearing this Commonwealth's appeal on the operator cheating issue."

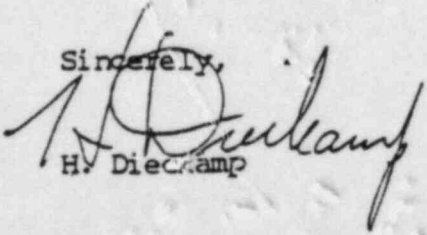
We had been hopeful that this matter would have been resolved by the appeal processes by this time. Since it is not, we have undertaken a review of the actions that we can take to resolve this issue and to provide assurances with respect to other issues. We want to inform you of the following commitments on the part of the Company with respect to the three remaining outstanding issues on which the Commonwealth filed exceptions with the Atomic Safety and Licensing Appeals Board on August 20, 1982.

- 1) The Company will not utilize anyone to operate TMI-1 who was found by the ASLB to have cheated on an NRC administered licensing exam or on a company administered training exam (Mr.H.).
- 2) The Company will not utilize Mr. DD (whose attitude was criticized by the ASLB) to operate TMI-1 or to train operating license holders or trainees.
- 3) The Company will direct the ASLB mandated training audit to specifically evaluate Mr. DD's performance as an instructor and the Company will comply with the findings in a timely and appropriate manner. Prior to the audit the Company will continue to monitor Mr. DD's performance and assign work consistent with that performance.

We believe that these commitments remove the concerns that are the subject of the Commonwealth's appeal before the Atomic Safety and Licensing Appeal Board.

We will be informing the NRC, with a copy to you, of additional commitments that we will also be completing prior to restart so as to provide additional assurance regarding protection of public health and safety and a further basis for confidence in the integrity of the management and staff which will be involved in the operation of TMI-1.

Sincerely,


H. Dieckamp

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

0 1983
'83 JUN 10 P2:25

Before the Commission

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289 (Restart)
)	
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

CERTIFICATE OF SERVICE

I hereby certify that copies of Licensee's letter to the Secretary of the Commission were served this 10th day of June, 1983, by hand delivery to those persons identified by an asterisk (*) preceding their names, and by deposit in the United States mail, postage prepaid, addressed to the others persons on the attached Service List.

Ernest L. Blake, Jr.
Ernest L. Blake, Jr.

DATED: June 10, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Commission

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289 SP
)	
(Three Mile Island Nuclear)	(Restart)
Station, Unit No. 1))	

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