



GPU Nuclear Corporation
Route 441 South
P.O. Box 480
Middletown, Pennsylvania 17057-0480
(717) 944-7621
Writer's Direct Dial Number:
(717) 948-8005

November 23, 1994
C311-94-2327

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 Operational Safety Team Inspection (OSTI)
Inspection Report 94-080

GPU Nuclear has reviewed the OSTI Inspection Report (IR 94-080). The OSTI was a comprehensive, performance-based inspection that was conducted in a thorough and professional manner. GPU Nuclear welcomes the finding that plant processes and programs were being conducted in a safe and controlled manner. We are pleased that the inspection team identified strengths in the engineering area, operator performance in the control room and maintenance training. We agree there are instances where administrative requirements, which prescribe operator performance standards, do not accurately reflect management expectations. We also agree that there were deficiencies that were not promptly entered into corrective action programs and that there is a lack of a user-friendly system to aid operators in determining the status of corrective actions regarding minor, non-safety related equipment problems and are working to correct them. The OSTI inspection findings have been helpful in identifying those areas in which GPU Nuclear can further improve performance at TMI-1 in operating the plant in a safe and effective manner. Our goal is to maintain the strengths identified in the OSTI report and to improve our performance in the areas where deficiencies were identified. To that end, GPU Nuclear initiated action to improve performance in the deficient areas even before the OSTI inspectors completed their inspection.

The GPU Nuclear response to the notice of violation regarding the deferral/cancellation of preventative maintenance activities was submitted under separate cover.

GPU Nuclear notes that the OSTI found the administrative requirements for operating procedures were acceptable, but that management expectations for procedure use are not always accurately reflected in the applicable administrative procedures. Plant Operations management is evaluating this finding to determine what additional guidance should be incorporated into which administrative procedures to more effectively communicate management expectations.

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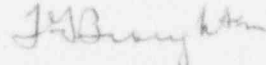
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GPU Nuclear is taking action to ensure that deficiencies are promptly entered into corrective action systems. Management attention is being provided to ensure that reports such as Quality Deficiency Reports, Material Non-conformance Reports and Event Capture Reports are initiated as required. The TMI Licensing Staff has been counseled on the need to track all NRC commitments via the Licensing Information Tracking Systems and directed to initiate a Licensing Action Request (formerly called Licensing Action Item) to track each NRC commitment.

The TMI Plant Operations department has initiated a review of the methods by which minor, non-safety related equipment problems are identified, tracked and resolved. Until this review is completed, non-licensed operators have been instructed to document all minor equipment deficiencies noted, regardless of previous documentation. Shift Foreman have been directed to determine if a work request is required to correct the deficiencies noted, or to confirm that a work request has already been issued.

GPU Nuclear appreciates the opportunity to respond to the OSTI inspection report. If you have any questions regarding our responses to the report, please contact John Schork, TMI Licensing Engineer.

Sincerely,



T. G. Broughton
Vice President and Director, TMI

JSS

cc: Region I Administrator
TMI-1 Senior Project Manager
TMI Senior Resident Inspection