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Mr. Richard W. Starostecki, Director
Division of Project and Resident Programs
U. S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA. 19406

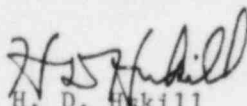
Dear Mr. Starostecki:

Three Mile Island Nuclear Station, Unit I (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
GPUN Comments on the NRC Systematic Assessment
of Licensee Performance (SALP) for TMI-1

Your letter of April 24, 1984, forwarded the NRC Region I SALP Board's assessment of the performance of activities associated with TMI-1. The positive results of the SALP report reinforce our belief that the TMI-1 organization is technically competent with a strong commitment to safety. The board's acknowledgement of this is appreciated.

Attached are comments on those sections where we felt discussion was appropriate. These comments represent our formal response to the SALP report and supplement the discussions at the May 22, 1984 meeting. Included in these comments are plans for improvement in our performance in appropriate areas. We are committed to continued effort to maintain or improve performance in all areas.

Sincerely,


H. D. Hukill
Director, TMI-1

HDH/SMO/rs

Enclosure

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PLANT OPERATIONS

We concur that performance problems were encountered. We believe these were isolated cases which do not indicate that we have programmatic problems. We have addressed each case and have taken actions which we believe will help improve our future performance. These include disciplinary action, additional training, and procedure reviews. A more detailed description of the positive changes which have been made is given in the GPUN letter of March 30, 1984 which responds to your February 29, 1983 Notice of Violation and Proposed Civil Penalty, and in the GPUN letter of May 14, 1984 which responds to the Operational Readiness Evaluation of February 8 & 9, 1984. We also plan to institute measures which provide for verification of critical valve alignments for complicated or unique activities on a case by case basis.

DESIGN, ENGINEERING AND MODIFICATION

GPUNC has recognized the need to strengthen and improve interdepartmental and interdivisional communication in the modification area. This recognition manifested itself in the establishment of formalized procedural controls for modification project reviews. These controls were established by the issuance of Engineering Management Procedure (EMP-014) titled "Project Reviews", in September, 1982. The initial issue of this procedure formalized requirements for a Preliminary Engineering Design Review (PEDR). At the PEDR, all involved organizations review and concur with the preliminary engineering for a modification. This approach proved so effective that the procedure was expanded in August, 1983, to require a formal Operability/Maintainability/Constructibility Review (OMCR) prior to releasing detailed engineering for construction. The OMCR is intended to further improve coordination at the critical stage when a modification is about to start into construction. The OMCR's held during the past 9 months have reduced constructibility problems by identifying and correcting deficiencies before construction release.

The modifications reviewed by the NRC were started and/or released for construction before the effective date of (EMP-014). GPUNC is confident that subsequent NRC inspections of modifications currently being designed will note the improvement in communications and reduction in constructibility problems. The procedural controls will also improve the ability to provide Operations with "a better integrated picture" at modification turnover and reduce the number and significance of Incomplete Work List (IWL) items.

GPUNC recognizes the need for further improvement and continued management attention to improving our performance in the area of modifications. A task group established in March 1984 composed of senior GPUNC directors and managers is currently reviewing the overall modification process. The intent is to identify actions which would

improve our efficiency and performance. The task group is composed of senior personnel from involved divisions working in the modifications process. Thus, by its very nature, the task group is providing communications and understanding between divisions. GPUNC will review and act on recommendations from this group.

GPUN recognizes the importance of the Environmental Qualification issue and agrees that more management involvement is desirable in this area. As the SALP report points out, we have developed a corporate procedure on EQ. The procedure prescribes the methods by which EQ requirements are established and assures compliance with applicable regulations. We are currently taking steps to expand our resources in the Environmental Qualification area, improve our documentation files, and are increasing our management attention on the EQ Program.

LICENSING ACTIVITIES

We have worked during this appraisal period to improve on our schedules for licensing submittals. Considering the large number of these submittals (over 300), we believe we have made significant progress in this area. We agree with the staff, however, that further improvement is desirable. We will continue our efforts toward improving our schedules.

In a very limited number of cases, the staff noted that certain issues required further analysis and justification to support requested changes to the Tech. Specs. We agree that these issues were generally of lesser significance than others that were active during the period. We will increase our efforts to better document the bases for our requests and to respond to staff questions.