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August 6, 1979
GQL 1018

Mr. S. H. Grier, Director
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Three Mile Island Nuclear Station, Units 1 and 2
Operating License No. DPR-50 and DPR-73
Docket No. 50-289 and 50-320
Radiation Protection Program

Dear Sir:

Met-Ed has closely followed the commitments which were made in our 7/18/79 letter (GQL 0909) to your office. As discussed in a meeting on 8/3/79 with members of your staff, certain commitment dates have arrived and it is appropriate to provide a status of our commitments. As noted in the 8/3/79 meeting, positive action has been taken on all items.

1. The specific status of each item in paragraph 1 of GQL 0909 is presented below.
 - a) The overall Radiation Protection Program organizational changes have been described in the form of a revised organization chart which is currently under review. This chart will be provided to your staff by August 10, 1979.
 - b) Functional areas of the Radiation Protection Program have been identified on the revised organization chart. Descriptions including the specific responsibilities of each functional area are currently being prepared and will be provided to your staff by August 10, 1979.
 - c) The individuals responsible and the lines of responsibility for each functional area of the Radiation Protection Program within the Met-Ed organization have been identified on the revised organization chart which will be provided to your staff by August 10, 1979.
 - d) The geographic responsibilities of the Radiation Protection staff assigned to Units 1 and 2 have been defined in the form of a plan view chart of Units 1 and 2 clearly marked to delineate geographic areas of responsibility on each unit. This chart is currently under review and will be provided to your office by August 10, 1979.

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2. Met-Ed is currently reviewing the adequacy of the QA program as it relates to providing for regular audits of the Radiation Protection Program by individuals who are independent of the day-to-day radiological protection activities. Our commitment to complete this review by August 15, 1979, remains on schedule.
3. The procedures for the control of high radiation areas have been revised and are currently under review. These procedures include specific steps for the control of keys for such areas and a surveillance program for identifying new high radiation areas and for ensuring that such areas are properly controlled. Comments received from your staff subsequent to the August 3, 1979 meeting regarding action levels and requirements will be incorporated into our procedures by August 10, 1979.
4. Met-Ed has issued a procedure containing written criteria for evaluating air sample results with respect to beta-gamma ratios and beta energies. Comments received from your staff prior to the August 3, 1979 meeting relative to formal procedure issuance and procedure format will be resolved prior to August 10, 1979.
5.
 - a. Met-Ed formally reviewed the adequacy of the existing requirements for the bioassay program on 26 July. Based upon our review, our present Health Physics Procedure "Internal Dosimetry/Bioassay Program" (HP 1628) will be revised in accordance with the latest guidance provided in ANSI N-347, Reg. Guide 8.15, and details of NuReg 0041. It will include action levels for whole body counting and urinalysis for suspected acute and chronic exposures of Sr-89 and Sr-90.
 - b. Health Physics Procedure "Respiratory Protection Program" (HP 1616) will be expanded to include a detailed air sample analysis sequence with action levels specified when airborne concentrations of Sr-89 and Sr-90 (based on Cs levels) are detected.
 - c. The calculation of MPC exposure hours for airborne concentrations of radioactivity will formally be included in health physics procedure "RWP procedure" (HP 1613). Additionally, the appropriate health physics procedure will include the requirement for a periodic review of air sample results.
 - d. Procedures specifying the care, use and cleaning of the respiratory protection devices available, tritium air sampling and overall respiratory program implementation will be included in the Respiratory Protection Program.
 - e. Health Physics procedure "Air Test Booth" (HP 1717) will be reviewed and revised as required.
 - f. As previously committed, Met-Ed will have implemented the revised procedures outlined above to assure a comprehensive bioassay program by 17 August 1979.

6. By August 17, 1979, Met-Ed will review and implement necessary changes to the procedures which define the program that evaluates the potential exposure of individuals to concentrations of airborne radioactive materials as required by 10 CFR 20.201(b).

Sincerely,

/s/ J. G. Herbein

J. G. Herbein
Vice President-Nuclear Operations

cc: G. P. Miller