



GPU Nuclear Corporation
Post Office Box 480
Route 441 South
Middletown, Pennsylvania 17057-0191
717 944-7621
TELEX 84-2386
Writer's Direct Dial Number:

July 2, 1985
5211-85-2119

Office of Nuclear Reactor Regulation
Attn: J. F. Stolz, Chief
Operating Reactor Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Stolz:

Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Response to IR 84-29

Inspection Report 84-29, dated December 4, 1984, requested Technical Specification changes be proposed to reflect the actual composition of the site fire brigade or separate unit brigades and to delete the reference to Section 27 of NFPA Code-1976 as the basis for the Fire Brigade Training Program. We feel our current Technical Specifications in both areas are adequate, therefore, we will not be submitting a TSCR.

Technical Specification 6.2.2.g requires a Site Fire Brigade of at least five members be maintained at all times. This is consistent with B&W STS 6.2.2.e. TMI-1 Administrative Procedure 1038 allows the same personnel to serve in Unit 1 and Unit 2 only if they have received Unit 2 specific training. TMI-2 procedure 4000-ADM-3680.01 requires Unit 1 specific training of Unit 2 personnel who also serve Unit 1. Although we currently have personnel who serve only Unit 1 or Unit 2, we wish to reserve the right to change the structure of the fire brigade if, in the future, a Unit 2 fire brigade is no longer necessary.

Technical Specification 6.4.2 requires a fire brigade training program be maintained which meets or exceeds the requirements of Section 27 of NFPA Code-1976. Our training program exceeds Section 27 which was the guideline given in the document used to review the training program, BTP 9.5.1.

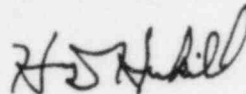
8507090418 850702
PDR ADOCK 05000289
G PDR

ADD
1/1

July 2, 1985

Although the statements in Section 27 are preceded by "should," which implies they are recommendations, these statements are considered requirements in the Fire Brigade Training Program, which is defined in our Fire Protection Plan submitted January 4, 1984 as a licensing basis document. We feel the TS we have in place is adequate and enforceable, therefore, referencing Section I of Appendix R, which has been suggested by the NRC, is unnecessary.

Sincerely,



H. D. Hukill
Director, TMI-1

HDH/SMO/spb:0308A

cc: T. Murley
R. Conte