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July 1, 1985

TMI Program Office
Attn: Dr. B. J. Snyder
Program Director
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Snyder:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Configuration Control

Recently our respective staffs have been involved in discussions on the overall topic of configuration control including specific requirements to update certain System Descriptions and the adequacy of the existing system. The purpose of this letter is to provide information concerning the current program.

The current TMI-2 System Description update program is based on the requirements of 10 CFR 50.71 as they relate to FSAR update. As amended in May of 1980, 10 CFR 50.71 required current licensees to update the FSAR within 24 months of the effective date of the rule (July 23, 1980). On May 6, 1981, Met-Ed/GPU Nuclear submitted a request for exemption from the FSAR update requirement on the basis that:

The FSAR was written to provide a basis to allow TMI-2 to operate at power. Operation at power is no longer possible with TMI-2 in its present state. Additionally, the TMI-2 FSAR, although a valuable reference document, does not completely scope the recovery effort. Each major step of the recovery, such as reactor building sump water processing, will be presented in a Technical Evaluation Report so that a safety evaluation of the entire recovery effort will eventually be developed, therefore, updating the FSAR itself is not necessary.

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The NRC approval of this request was effective on July 20, 1981, with the stipulation that "... the System Descriptions for the major post-accident recovery systems (e.g., EPICOR II, Mini Decay Heat Removal System, Standby Pressure Control, Long Term B Cooling, Tank Farm, Solid Waste Staging Facility, etc.) are kept updated since there are no TER's (Technical Evaluation Reports) for these systems". This stipulation was based on discussions between the NRC and Met-Ed/GPU since no docketed information existed for many of the systems listed above.

Subsequently, discussions were held with the NRC to determine which Systems Descriptions should be updated. On January 20, 1982 the first set of System Description/Technical Evaluation Report updates were submitted to the NRC; the letter transmitting this submittal identified the documents to be updated. The list has changed as the recovery progressed; new post-accident recovery systems have been added (e.g., Processed Water Storage and Recycle System) and decommissioned systems (e.g., Tank Farm) have been deleted. Thus, GPU Nuclear has complied with the intent of your July 20, 1981, stipulation.

In addition to updating the System Descriptions discussed above, TMI-2 insures overall configuration control in the following manner:

1. Each engineering change is reviewed to determine which procedures and drawings are affected.
2. Prior to turnover of modifications the affected operating section verifies that all procedures required for system operations are issued.
3. Update of selected drawings which Site Operations has determined to be important also occurs prior to turnover. These drawings consist mainly of Piping and Instrumentation Diagrams (P&ID's) and Electrical One Line Diagrams used by Control Room Personnel.
4. Engineering changes which affect other drawings are documented in the Drawing Related Document List (DRDL). This list identifies modifications outstanding against each drawing. Prior to using a specific drawing, an individual is expected to consult the DRDL to ascertain if modifications are outstanding against the drawing and review such modifications to verify the accuracy of the drawing.
5. Drawings listed in the DRDL are updated as time and funding permit.

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In conclusion, System Descriptions for the major post-accident recovery systems are maintained as required by your letter of July 20, 1981. Drawings used by Control Room Personnel and relevant procedures are maintained current. Engineering and other support personnel have access to this material. In addition, the DRDL is available to provide current system status for verification of a drawing prior to its use.

GPU Nuclear judges this program to be in compliance with the intent of the NRC stipulation included in the July 20, 1981, exemption to 10 CFR 50.71. Further, we conclude that the program is adequate and appropriate for maintaining an effective configuration control mechanism at TMI-2, as evidenced by past performance.

Sincerely,



F. R. Standerfer
Vice President/Director, TMI-2

FRS/JJB/eml

Attachment

cc: Deputy Program Director - TMI Program Office, Dr. W. D. Travers