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May 7, 1985
5211-85-2087

Dr. Thomas E. Murley
Region I, Regional Administrator
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Dear Dr. Murley:

Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Comments on the 1984 TMI-1 Systematic
Assessment of Licensee Performance (SALP)

We appreciated the opportunity to discuss the TMI-1 SALP Report with you on April 11, 1985. From our meeting we developed a better understanding of the report details and NRC staff's perception of our operations. We believe that the SALP process is mutually beneficial and provides a logical reference point for us to refocus our efforts toward improvement.

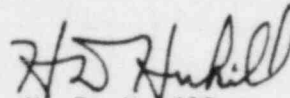
It is evident that the NRC staff devoted a great deal of effort in preparing the SALP Report. We were impressed with the content and accuracy of the details of the report. We believe the report for the most part reflects accurately the performance of GPUN and we accept its findings.

We note that the SALP Report contains a new feature in that it presents the trend in performance in each functional area based on a comparison of performance during the last quarter of the assessment period to that during the entire period. However, we had considered that the trend could be misread to indicate stagnation in areas where "consistent" was indicated. We understand from our meeting that "consistent" does not indicate stagnation, but rather indicates to the licensee that performance was consistent throughout the reporting period and there were no apparent changes or trends in performance towards the end. Although not really applicable to this report, since all recent trends were indicated to be "consistent," this information will be useful to other licensees and to us in future reports to evaluate recent trends to determine required actions and/or the effectiveness of actions already initiated when either "improving" or "declining" trends are indicated.

It is our intention to continue efforts to improve our operations in all areas including those rated "1" in the SALP Report as well as the QA and training areas which were not specifically rated. We will be particularly responsive to your comments that we need to remain sensitive to factors affecting performance during changing plant operational modes. In anticipation of return to power operations, we will review the available experiences of other plants during startup and power operation after a long shutdown.

Specific comments concerning improvement and SALP details are attached.

Sincerely,


H. D. Hukill
Director, TMI-1

HDH/CWS/spb:0245A

cc: R. Conte
O. Thompson
J. Stolz
J. Thoma
E. Conner

DETAILED COMMENTS ON THE TMI-1 SALP

A. Shutdown Plant Operations

This section notes that 3 of 9 SRO candidates failed their licensing exams. This is misleading since 7 candidates were examined, 3 failed and 2 were re-examined making a total of 9 exams. The 2 candidates that were re-examined passed the re-exam before the end of the SALP period. The remaining SRO was moved to a position where a SRO license was not required. Similarly, the one RO failure was re-examined in April, 1985 and passed the re-exam.

This section also commented that increased management attention may be warranted to assure completeness of procedures and consistency with higher tier procedures and requirements. GPUN agrees that this area can be improved and greater emphasis will be placed on assuring consistency among procedures and assuring that programmatic requirements are addressed. Known instances of conflicts in procedures caused initially by implementation of ATOG procedures have been corrected. Potential future problems and any unidentified will be addressed via the two year procedure review cycle as well as increased training of procedure owners and additional emphasis to them regarding their responsibility for preparing accurate, practical and consistent procedures. In the maintenance area, procedure preparation training is being conducted. Senior maintenance management has monitored procedure changes and new procedures for a two month period and has noted a significant improvement. QA/QC is scheduled to audit the maintenance procedure changes to assess the quality of the initial procedure submittals.

We believe that the highly successful completion of hot functional testing in April of this year is further evidence of our operational ability and management's close attention to and direction of all aspects of plant operations and control.

B. Radiological Controls

No comments.

C. Maintenance

During the April 11, 1985 SALP meeting, there was a long discussion of the graded approach to QA and the development of a component level QCL. A component level QCL is being developed and will provide an

important and needed focus on determining the appropriate level of verification to be applied to each component. In performing maintenance, the importance of the QCL is less critical. The maintenance philosophy at TMI-1 is that procedures are needed and quality is important regardless of the status of a component/system on a QCL. The fact that an item is not on our QCL is not and will not be used as a basis for accepting poor quality.

D. Preoperational Test and Surveillance

No comments.

E. Fire Protection and Housekeeping

No comments.

F. Emergency Preparedness

No comments.

G. Security and Safeguards

No comments.

H. Design, Engineering and Modification

The recommendations of the GPUN modifications task force mentioned in this section have been approved by the Office of the President. Actions are underway to respond to all of the items. The details concerning implementation of these recommendations are available for NRC review.

GPUN has implemented a process of Preliminary Engineering Design Reviews and Operations Maintainability and Constructability Reviews (PEDR/OMCR) for modifications in addition to engineering walkdowns during the preliminary and detailed design process. This process we believe will be very successful in eliminating much of the previous rework. We are also retraining people on the Field Change Request System and taking other measures to lessen modification rework and reduce paperwork. As the older modifications which did not benefit from the PEDR/OMCR process are being completed, a steady improvement has been noted.

I. Licensing Activities

Since the SALP meeting on April 11, 1985, we have contacted our NRC project manager and discussed exchanging lists in order to define the current inventory of licensing issues. Later we plan to meet with the NRC staff to agree on priorities and target dates for resolution of the items. The plan developed will be updated periodically thereafter to reflect changing priorities and revised target dates. We believe that the process will assure that all items receive appropriate attention.

In addition, greater emphasis will be placed on the no significant hazards writeup portion of the Technical Specification Change Requests (TSCR) that are initiated by GPUN* and the examples referred to in 48 FR 14870 will be used where appropriate.

*Based on our meeting we understand that "site originated documents" refers to GPUN initiated TSCRs.