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December 05, 1996
6710-96-2399

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

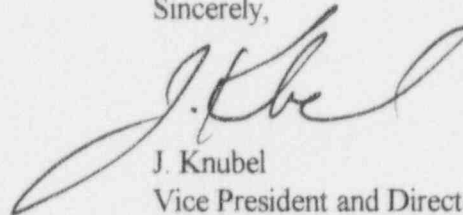
Gentlemen:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Response to Inspection Report 50-289/95-16 Reply

- References:
- (1) NRC Letter dated March 11, 1996, "Notice of Violation (NRC Inspection Report No. 50-289/95-16)."
 - (2) GPU Nuclear Letter 6710-96-2024, dated April 10, 1996, "Response to Notice of Violation."
 - (3) NRC Letter dated October 29, 1996 (received November 6, 1996), "Inspection Report 50-289/95-16 Reply."

Attachment I to this letter provides GPU Nuclear's response to your Reference 3 request to provide "...a specific reference to the section of ASME Section XI that allows the use of engineering judgment in lieu of code specified acceptance criteria, and an explanation of how your current ASME Section XI implementation program precludes situations similar to the RCS drain line."

Sincerely,



J. Knubel
Vice President and Director, TMI

cc: TMI Senior Resident Inspector
TMI-1 Senior Project Manager
Region Administrator

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PDR ADOCK 05000289
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ATTACHMENT I

This attachment provides GPU Nuclear's response to your Reference 3 request to provide "...a specific reference to the section of ASME Section XI that allows the use of engineering judgment in lieu of code specified acceptance criteria, and an explanation of how your current ASME Section XI implementation program precludes situations similar to the RCS drain line."

At the time of the subject violation, the ASME Section XI code of record applicable to TMI was ASME Section XI 1977 Code through the 1978 Summer Addenda. This code version provided no acceptance standards for component supports. GPU Nuclear used engineering judgment in the evaluation of the RCS drain line supports. Please recognize that at that time no code acceptance criteria or specific code requirements then existed and therefore engineering judgment was not used "...in lieu of code specified acceptance criteria." GPU Nuclear agrees that no editions of ASME Section XI specify that engineering judgment can be used "in lieu of code specified acceptance criteria." GPU Nuclear reaffirms that engineering judgment was not used "...in lieu of codes specified acceptance criteria."

The code of record for the current TMI ASME Section XI implementation program is ASME Section XI 1986. The 1986 Edition of ASME Section XI, subsection IWF-3410, provides acceptance standards for inspecting component supports. Therefore, GPU Nuclear will continue to comply with the current code of record which requires unacceptable conditions to be replaced, repaired, or demonstrated to meet functional requirements through testing or evaluation (IWF-3410).

To clarify GPU Nuclear's position as stated above, the response to Reference 2, Violation B, first paragraph, last sentence, is modified to read: "GPU Nuclear maintains that the use of engineering judgment to evaluate existing conditions *under the TMI ASME Section XI implementation program* is acceptable *only when no code specified acceptance criteria or specific code requirements exist.*"

References

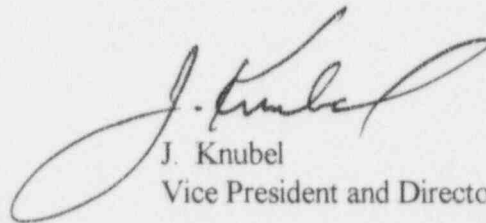
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METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER AND LIGHT COMPANY
PENNSYLVANIA ELECTRICAL COMPANY
GPU NUCLEAR CORPORATION

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289

Reply to NRC Letter dated October 29, 1996, (received November 6, 1996),
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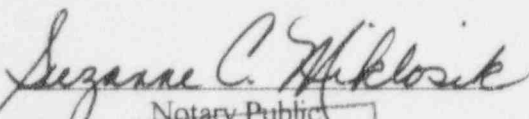
This letter is submitted in reply to NRC Letter dated October 29, 1996, (received November 6, 1996), "Inspection Report 50-289/95-16 Reply", which requested additional information in reference to NRC Letter dated March 11, 1996, "Notice of Violation (NRC Inspection Report No. 50-289/95-16)." All statements contained in this reply have been reviewed, and all such statements made and matters set forth therein are true and correct to the best of my knowledge.



J. Knubel
Vice President and Director, TMI-1

Signed and sworn before me this

5th day of December 1996



Notary Public
Notarial Seal
Suzanne C. Miklosik, Notary Public
Londonderry Twp., Dauphin County
My Commission Expires Nov. 22, 1999
Member, Pennsylvania Association of Notaries