

November 25, 1985

DMB-016

Docket No. 50-289

Mr. Henry D. Hukill, Vice President
and Director - TMJ-1
GPU Nuclear Corporation
P. O. Box 480
Middletown, Pennsylvania 17057

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Dear Mr. Hukill:

SUBJECT: EMERGENCY RESPONSE CAPABILITY - CONFORMANCE TO REGULATORY GUIDE 1.97

We have reviewed your letter of October 1, 1984 which provided detailed descriptions of how you will comply with Regulatory Guide 1.97, Rev. 2. We conclude that you provided an explicit commitment on conformance with Regulatory Guide 1.97, with the exception of certain items as identified in your letter.

Some of your justifications for exceptions are acceptable. However, there are some items for which we could not conclude that adequate justification was provided. In the enclosed interim report prepared by our contractor, INEL, we provide the status of our review to date. You are requested to respond to the open items within 60 days of receipt of this request. In your response, you should also comment on whether the enclosed report includes any incorrect assumptions or reflects a commitment which you believe is beyond the intent of your previous response. This interim report refers to the II.B.3 review as being in progress when in fact it is completed for TMJ-1.

One point of clarification is necessary. In several of your exemption requests, the only exception requested is having equipment which is environmentally qualified. Regulatory Guide 1.97 has been superseded by a regulatory requirement, namely 10 CFR 50.49. Exemptions to any item required to be environmentally qualified are covered by the rule and not this review. If you take exception with Regulatory Guide 1.97 on if a particular item should be environmentally qualified, then you must provide a detailed systems type justification for your exception. In several instances, particularly for Category 2 items, you provided inadequate justification for not environmentally qualifying this equipment. For open items as described in section 4 of the enclosed document where the only discrepancy is environmental

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Mr. Hukill

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qualification, we only need a statement that this equipment is included in your EQ program per 10 CFR 50.49. Otherwise you will need to provide a systems type justification for not qualifying this equipment.

Sincerely,

"ORIGINAL SIGNED BY
JOHN F. STOLZ"

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

Enclosure:
As Stated

cc w/enclosure:
See next page

ORB#4:DL
JThoma;cr
11/19/85

JCSB
JJoyce
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ORB#5:DL
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11/21/85

ORB#4:DL
JStolz
11/21/85

Mr. Henry D. Hukill
GPU Nuclear Corporation

cc:
Mr. R. J. Toole
O&M Director, TMJ-1
GPU Nuclear Corporation
Middletown, Pennsylvania 17057

Richard J. McGoey
Manager, PWR Licensing
GPU Nuclear Corporation
100 Interpace Parkway
Parsippany, New Jersey 70754

Mr. C. W. Smyth
TMJ-1 Licensing Manager
GPU Nuclear Corporation
P. O. Box 480
Middletown, Pennsylvania 17057

G. F. Trowbridge, Esq.
Shaw, Pittman, Potts & Trowbridge
1800 M Street, N.W.
Washington, D.C. 20036

Ivan W. Smith, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Sheldon J. Wolfe, Esq., Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Gustave A. Linenberger, Jr.
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. James Lamb, III
Administrative Judge
313 Woodhaven Road
Chapel Hill, North Carolina 17514

Mr. David Hetrick
Administrative Judge
Professor of Nuclear Energy
University of Arizona
Tucson, Arizona 85721

Three Mile Island Nuclear Station
Unit No. 1

Mr. Richard Conte
Senior Resident Inspector (TMJ-1)
U.S.N.R.C.
P.O. Box 311
Middletown, Pennsylvania 17057

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Mr. Robert B. Borsum
Babcock & Wilcox
Nuclear Power Generation Division
Suite 220, 7910 Woodmont Avenue
Bethesda, Maryland 20814

Governor's Office of State Planning
and Development
ATTN: Coordinator, Pennsylvania
State Clearinghouse
P. O. Box 1323
Harrisburg, Pennsylvania 17120

Mr. Earl B. Hoffman
Dauphin County Commissioner
Dauphin County Courthouse
Front and Market Streets
Harrisburg, Pennsylvania 17101

Dauphin County Office of Emergency
Preparedness
Court House, Room 7
Front and Market Streets
Harrisburg, Pennsylvania 17101

Mr. David D. Maxwell, Chairman
Board of Supervisors
Londonderry Township
FRD#1 - Geyers Church Road
Middletown, Pennsylvania 17057

Mr. Thomas M. Gerusky, Director
Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

cc:

Thomas Y. Au, Esq.
Office of Chief Counsel
Department of Environmental Resources
505 Executive House
P. O. Box 2357
Harrisburg, Pennsylvania 17120

Mr. Bob Stein, Director of Research
Committee on Energy
P. O. Box 11867
104 Blatt Building
Columbia, South Carolina 29211

Ms. Jane Lee
183 Valley Road
Etters, Pennsylvania 17319

Ms. Marjorie M. Aamodt
Mr. Norman Aamodt
200 North Church Street
Parkesburg, Pennsylvania 19365

Ms. Louise Bradford
TMJA
315 Peffer Street
Harrisburg, Pennsylvania 17102

Mr. Marvin J. Lewis
6504 Bradford Terrace
Philadelphia, Pennsylvania 19149

Mr. Chauncey Kepford
Ms. Judith H. Johnsrud
Environmental Coalition on Nuclear Power
433 Orlando Avenue
State College, Pennsylvania 16801

Mr. Donald E. Hossler
501 Vine Street
Middletown, Pennsylvania 17057

Mr. Ad Crable
Lancaster New Era
8 West King Street
Lancaster, Pennsylvania 17602

Sen. Allen R. Carter, Chairman
Joint Legislative Committee on Energy
P. O. Box 142
Suite 513
Senate Gressette Building
Columbia, South Carolina 29202

Ms. Frieda Berryhill, Chairman
Coalition for Nuclear Power Plant
Postponement
2610 Grendon Drive
Wilmington, Delaware 19808

William S. Jordan, III, Esq.
Harmon, Weiss & Jordan
20001 S Street, N.W.
Suite 430
Washington, D.C. 20009

Lynne Bernabei, Esq.
Government Accountability Project
1555 Connecticut Ave., N.W.
Washington, D.C. 20009

Michael W. Maupin, Esq.
Hunton & Williams
707 East Main Street
P. O. Box 1535
Richmond Virginia 23212

Jordan D. Cunningham, Esq.
Fox, Farr and Cunningham
2320 North 2nd Street
Harrisburg, Pennsylvania 17110

Ms. Ellyn R. Weiss
Harmon, Weiss & Jordan
2001 S Street, N.W.
Suite 430
Washington, D.C. 20009

GPU Nuclear Corporation

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Three Mile Island, Unit 1

cc:

Atomic Safety & Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Appeal
Board Panel (8)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555