

July 26, 2002

Mr. John L. Skolds, President
and Chief Nuclear Officer
Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 (TMI-1), REQUEST FOR
ADDITIONAL INFORMATION (RAI) RE: DELETION OF IOSRG
(INDEPENDENT ONSITE SAFETY REVIEW GROUP) REQUIREMENTS FROM
THE TMI-1 TECHNICAL SPECIFICATIONS (TSs) (TAC NO. MB2964)

Dear Mr. Skolds:

On July 18, 2002, the NRC staff held a conference call with members of your staff and requested additional information related to your application dated August 14, 2001, containing a proposed license amendment to eliminate the IOSRG requirements from the TMI-1 TSs. The purpose of this letter is to formally document the NRC staff's RAI. As agreed to by your staff, we request that you respond to the NRC staff's request by August 18, 2002.

If you have any questions, please contact me at 301-415-1402.

Sincerely,

/RA/

Timothy G. Colburn, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure: RAI

cc w/encl: See next page

July 26, 2002

Mr. John L. Skolds, President
and Chief Nuclear Officer
Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 (TMI-1), REQUEST FOR
ADDITIONAL INFORMATION (RAI) RE: DELETION OF IOSRG
(INDEPENDENT ONSITE SAFETY REVIEW GROUP) REQUIREMENTS FROM
THE TMI-1 TECHNICAL SPECIFICATIONS (TSs) (TAC NO. MB2964)

Dear Mr. Skolds:

On July 18, 2002, the NRC staff held a conference call with members of your staff and requested additional information related to your application dated August 14, 2001, containing a proposed license amendment to eliminate the IOSRG requirements from the TMI-1 TSs. The purpose of this letter is to formally document the NRC staff's RAI. As agreed to by your staff, we request that you respond to the NRC staff's request by August 18, 2002.

If you have any questions, please contact me at 301-415-1402.

Sincerely,

/RA/

Timothy G. Colburn, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure: RAI

cc w/encl: See next page

DISTRIBUTION

PUBLIC	RLaufer	KHeck	KCoyne	TClark
PDI-1 Reading	BPlatchek, RI	SRichards	OGC	
MO'Brien	TColburn	DThatcher	ACRS	

ACCESSION NO.: ML022000569

*Concur with comments

OFFICE	PDI-1\PM	PDI-2\LA	IEHB\SC*	PDI-1\SC
NAME	TColburn	MO'Brien	DThatcher	RLaufer
DATE	7/24/02	7/24/02	7/26/02	7/26/02

OFFICIAL RECORD COPY

REQUEST FOR ADDITIONAL INFORMATION

THREE MILE ISLAND NUCLEAR STATION, UNIT 1 (TMI-1)

INDEPENDENT ONSITE SAFETY REVIEW GROUP (IOSRG)

TECHNICAL SPECIFICATION (TS) CHANGE REQUEST

DOCKET NO. 50-289

1. The August 14, 2001, application did not contain specific information on qualification and training requirements for those performing alternate IOSRG functions. Please provide an item-by-item analysis for each of the proposed alternate IOSRG functions, to determine the qualification and training requirements of the individuals or groups performing those alternate IOSRG functions and identify where those requirements are documented. Please confirm that the qualification and training requirements either meet or exceed the current IOSRG qualification and training requirement or, where the qualification and training requirements are less stringent, please provide justification. The Standard Review Plan (SRP), Section 13.4, provides the basis for Nuclear Regulatory Commission (NRC) staff evaluations for proposed changes to the Independent Safety Review Group (ISEG) functions described in NUREG-0737. IOSRG is the licensee's equivalent to ISEG. The licensee may wish to consider how the proposed IOSRG alternative functions comport with the guidance in SRP Section 13.4.
2. Please describe the reporting relationships for the various IOSRG alternate functions in order to demonstrate independence. Where reports are made to the site Vice President, please demonstrate how independence of the production reporting chain is maintained given that the Plant Manager also reports directly to the site Vice President.
3. In reviewing the proposed changes to the TMI-1 Operational Quality Assurance Plan (OQAP), it is not clear for alternate IOSRG functions, how the alternate IOSRG functions are maintained in documents subject to regulatory oversight. For example, changes to the OQAP that reduce commitments in the previously approved program description are required to be reviewed by the NRC prior to implementation in accordance with 10 CFR 50.54(a)(4). The proposed OQAP changes, largely serve the purpose of deleting the current IOSRG requirements from the OQAP. Please provide revised OQAP changes that identify the alternate IOSRG functions; the individual or groups responsible for completing those alternate IOSRG functions; and the qualification, training, and reporting requirements for those individuals or groups, or identify where in the OQAP those requirements currently reside. With respect to the level of detail expected in the revised OQAP pages, although not strictly applicable as the proposed changes are more than a relocation of requirements, Administrative Letter (AL) 95-06, dated December 12, 1995, provides some information with regard to suggested level of detail in QA plan changes. Specifically, AL 95-06 states that the level of detail in proposed revisions to the QA plan should be comparable to that previously contained in the TSs.

Enclosure

Three Mile Island Nuclear Station, Unit No. 1

cc:

Site Vice President - Three Mile Island Nuclear
Station Unit 1
AmerGen Energy Company, LLC
P. O. Box 480
Middletown, PA 17057

Senior Vice President Nuclear Services
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

Vice President - Mid-Atlantic Operations Support
Exelon Generation Company, LLC
200 Exelon Way, KSA 3-N
Kennett Square, PA 19348

Senior Vice President -
Mid Atlantic Regional Operating Group
Exelon Generation Company, LLC
200 Exelon Way, KSA 3-N
Kennett Square, PA 19348

Vice President -
Licensing and Regulatory Affairs
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

Regional Administrator
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Courthouse
Harrisburg, PA 17120

Chairman
Board of Supervisors
of Londonderry Township
R.D. #1, Geyers Church Road
Middletown, PA 17057

Senior Resident Inspector (TMI-1)
U.S. Nuclear Regulatory Commission
P.O. Box 219
Middletown, PA 17057

Director - Licensing - Mid-Atlantic Regional
Operating Group
Exelon Generation Company, LLC
Nuclear Group Headquarters
Correspondence Control
P.O. Box 160
Kennett Square, PA 19348

Rich Janati, Chief
Division of Nuclear Safety
Bureau of Radiation Protection
Department of Environmental Protection
Rachel Carson State Office Building
P.O. Box 8469
Harrisburg, PA 17105-8469

Three Mile Island Nuclear Station Unit 1
Plant Manager
AmerGen Energy Company, LLC
P. O. Box 480
Middletown, PA 17057

Regulatory Assurance Manager - Three Mile
Island Unit 1
AmerGen Energy Company, LLC
P.O. Box 480
Middletown, PA 17057

John F. Rogge, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Michael A. Schoppman
Framatome ANP
Suite 705
1911 North Ft. Myer Drive
Rosslyn, VA 22209

Three Mile Island Nuclear Station, Unit No. 1

cc: continued

Vice President, General Counsel and Secretary
Exelon Generation Company, LLC
300 Exelon Way
Kennett Square, PA 19348

Dr. Judith Johnsrud
National Energy Committee
Sierra Club
433 Orlando Avenue
State College, PA 16803

Eric Epstein
TMI Alert
4100 Hillsdale Road
Harrisburg, PA 17112

Correspondence Control Desk
Exelon Generation Company, LLC
200 Exelon Way, KSA 1-N-1
Kennett Square, PA 19348

Manager Licensing - Oyster Creek and Three Mile
Island
Exelon Generation Company, LLC
Nuclear Group Headquarters
Correspondence Control
P.O. Box 160
Kennett Square, PA 19348