

Central Files

DEC 17 1976

POOR ORIGINAL

Paul R. Nelson, Chief
Fuel Facility & Materials Safety Branch
Region 1

ENVIRONMENTAL TECHNICAL SPECIFICATION - THREE MILE ISLAND (TMI)
NUCLEAR STATION - UNIT 1 (F18174H2)

With regard to item A, NRC review of TMI data and program termination listed in your memorandum of September 22, the appropriate groups in Licensing have been contacted.

We have evaluated your suggested revision to ETS 2.2.2b (Item B) and do not believe that there is sufficient cause to initiate a change in the present wording. The licensee is responsible for demonstrating compliance with technical specifications. If he merely lists releases without maintaining a running sum, he cannot readily demonstrate compliance. The inspector should not have to do the licensee's bookkeeping. During the course of an inspection, if the licensee cannot demonstrate compliance to the satisfaction of the inspector, the inspector should discuss the matter at the exit interview, describe the matter in the inspection documentation, and carry it as an unresolved item.

Please call me if you have any questions.

Original signed by

L. B. Higginbotham

Leo B. Higginbotham, Chief
Safety and Environmental Programs Branch
Office of Inspection and Enforcement

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