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FEB 1977
U.S. NUCLEAR REGULATORY COMMISSION
Mail Section

Director of Nuclear Reactor Regulation
Attn: Mr. S. A. Varga, Chief
Light Water Reactors Branch 4
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Docket No. 50-320
License No. CPPR-66

Attached please find responses to the questions forwarded by your letter of January 10, 1977. Please note that certain organizational changes have been made and the attached responses reflect those changes. Also attached is a listing of FSAR pages which require revision as a result of title changes and/or the above mentioned organizational changes. An amendment to the TMI-2 FSAR will be forwarded by March, 1977. This amendment will incorporate into the FSAR the information contained in the attached responses as well as appropriate information discussed at our meeting on February 9, 1977.

Sincerely,

R. C. Arnold
Vice President

RCA:CWS:dr
Attachments

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Mail Section

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THREE MILE ISLAND, UNIT NO. 2 - ADDITIONAL QUESTIONS

412.11
(13.1.2.2)

Describe who has the specific site responsibility for nonemergency activities relating to emergency planning, environmental items and site radiological releases.

Response:

Emergency Planning

Plans for emergency situations have been developed and are included in Appendix 13A of the FSAR. In addition, procedures to implement the Emergency Plan are developed by the PORC and reviewed by the Corporate Technical Support Staff (CTSS). The need to revise the Emergency Plan is identified by either the CTSS or the unit staff and an appropriate revision to the Emergency Plan is prepared on an as needed basis. Following Emergency Plan revision any necessary implementing procedures are prepared by PORC and issued by the Unit Superintendent.

Environmental Items and Site Radiological Releases

Environmental matters and site radiological releases are the responsibility of the Supervisor-Radiation Protection and Chemistry. He is assisted in these duties by the Chemistry Supervisor, the Radiation Protection Supervisor and the Shift Supervisor.

412.12
(13.1.2.2)

Describe who has the specific day-to-day responsibility and authority for non-reactor specific activities including the nuclear engineering, maintenance, technical engineering, training, and radiation protection and chemistry groups in regard to:

a. Determining priority for work assignment for each unit;

b. Allocation of personnel such as technicians and repairmen to perform work on each unit;

c. Resolution of conflicts relative to "as needed," "desired," or "required" services on each unit;

d. Responsibility and authority over the above groups in the absence of their supervisor;

e. Station policies regarding maintenance programs, record keeping, training, fire protection, and administrative procedures, and

f. Station procedures relating to items such as maintenance and health physics.

Response:

a. The Unit Superintendent(s) determine the priority of work assigned to the nuclear engineering, maintenance, technical engineering, personnel in training, and radiation protection and chemistry groups.

b. Personnel from the above groups are assigned to the tasks by their group supervisor based on the priority assigned to a given task by the Unit Superintendent(s).

c. Conflicts arising as a result of the priorities assigned by the Unit Superintendents are brought to the attention of both Unit Superintendents. The Unit Superintendents resolve these conflicts and in the event that no agreement can be reached, the conflict is resolved by the Station Superintendent/Senior Unit Superintendent.

d. Should the Supervisor of any of the above groups be absent the activities of the group would be directed by a designated individual or by the Unit Superintendent(s).

e. Station policies for record keeping are dictated by the Technical Specifications and are implemented by the station administrative procedures. The Station Superintendent/Senior Unit Superintendent is responsible for station administrative procedures. Training policies are set forth in the FSAR and the day-to-day activities to fulfill these requirements are the responsibility of the training supervisor. The implementation of maintenance programs as defined in the FSAR and Technical Specificaitons are the responsibility of the Supervisor of Maintenance.

The Manager - Generation Administration is responsible for the fire protection program as defined by the FSAR.

f. Station procedures for maintenance and health physics are the responsibility of the Supervisor of Maintenance and the Supervisor of Radiation Protection and Chemistry, respectively. These procedures are reviewed by the PORC(s) and approved by the Station Superintendent/Senior Unit Superintendent.

412.13

Section 13.1.2.2.1.13 of the FSAR (Amendment 50) states that the Shift Supervisor is responsible for station operation in normal and emergency conditions. It also states that he reports to the (Unit) Supervisor of Operations, which is corroborated by Figure 13.1-1. During the normal day shift when the Supervisor of Operations and the Unit Superintendent are presumably on site, responsibilities are not clear. Furthermore, Figure 13.1-1 still identifies the Shift Supervisor position as nonmandatory, although you have stated elsewhere this position will be filled. Please clarify these items.

Response:

The Shift Supervisor is responsible for operation of both units and normally reports to the appropriate Unit Supervisor of Operation. During emergency conditions, or in the event he should receive conflicting instructions from either the Supervisors of Operations or Unit Superintendents, he has the authority and responsibility to report directly to the Station Superintendent/ Senior Unit Superintendent.

The non-mandatory nature of Shift Supervisor position has been removed.

412.14

We have reviewed the Three Mile Island Station Industrial Security Plan through Revision 12 dated April 15, 1976, with respect to references to Station and/or Unit management authorities and responsibilities for security. Additional changes in the plan are necessary so that these references accurately and clearly reflect the currently proposed station management organization.

Reference to the Station Superintendent, a position we understand is not now proposed to be utilized, occurs at page 6 (second paragraph), page 8 (last paragraph) and page 8a (last paragraph). Reference to the Unit Superintendent occurs on page 6a (second paragraph), and on Figure 2 which purports to show the line responsibility for security matters. Since there are expected to be two Unit Superintendents at Three Mile Island, these references lack clarity and specificity.

It is the staff's position that, since the security program is a station-wide program, a single management level individual should be designated as having the authority and responsibility which Met-Ed had previously proposed to vest in the Station Superintendent.

Response:

Revision 13 to the Three Mile Island Industrial Security Plan is being prepared. This revision will clarify references to the Unit Superintendents. In addition, this revision will designate the Manager - Generation Quality Assurance as the single management level individual having responsibility for the station security program.

In the event of security incidents, the shift security sergeant will report directly to the Shift Supervisor who will insure all necessary action is taken to counteract the security threat.

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