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August 8, 1979

U. S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555  
Attention: Harold R. Denton, Director

Dear Mr. Denton,

In response to the Three Mile Island-2 accident, the NRC has reallocated its resources to evaluate the implications of the accident on all current reactor designs. Aware of this, those utilities with Boiling Water Reactors currently in active FSAR review have agreed to join in a generic set of actions to support their licensing activity. This letter is written to advise you of this fact and to request a meeting with you on August 16, 1979 to discuss how we can best focus our actions.

In a manner similar to the BWR Operating Plant Owners Group, we have formed an Intermediate BWR Plant Owners Group. Its purpose is to actively focus and coordinate those generic activities necessary for the evaluation of the knowledge and experience gained and lessons learned from the Three Mile Island-2 accident. The group will provide a forum for interaction among the BWR Owners, the General Electric Company, and the Nuclear Regulatory Commission to ensure that the necessary generic licensing actions are performed in an efficient and timely manner. The Intermediate BWR Plant Owners Group is composed of representatives from Detroit Edison Company (Fermi-2), Mississippi Power and Light Company (Grand Gulf-1/2), Pennsylvania Power and Light (Susquehanna-1/2), and Washington Public Power Supply System (Hanford-2).

The principal thrust of group activities will be to actively address issues raised as a consequence of the Three Mile Island-2 accident to the extent that they are applicable to our BWR design. There are currently three sources:

- Inspection and Enforcement Bulletins
- Bulletins and Orders Task Force Information Requests
- Lessons Learned Task Force Recommendations

The first action of the Intermediate BWR Plant Owners Group will be to submit a report addressing the issues raised by these sources in a generic manner.

In order to ensure that this action on the part of the Owners Group is viewed in the proper context, a significant point must be emphasized:

- Each of the Intermediate Plant Owners Group plants is in the final stages of construction.

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This consideration is emphasized to ensure an awareness that any plant modifications would have a cost and schedule impact essentially identical to that for an operating plant.

Our purpose is to positively respond to each concern related to our plants. We believe our mutual efforts will provide a mechanism for incorporating the appropriate TMI lessons learned into our docket. We judge that this action is necessary to ensure active continuation of our docket review in support of our overall fuel load schedule and is consistent with your efforts to generically address these issues.

In summary, Pennsylvania Power & Light Company is a participant in the Intermediate BWR Plant Owners Group to ensure that our operating license review process is conducted as rapidly as possible. A meeting is requested on August 16, 1979 to exchange views with you regarding actions required to accomplish this, and to specifically discuss the proposed actions identified in this letter. An Owners Group representative will be in contact with you to confirm meeting arrangements.

Sincerely,



N. W. Curtis

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