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August 12, 1980
TLL 385

TMI Program Office
Attn: Mr. John T. Collins, Deputy Director
U. S. Nuclear Regulatory Commission
c/o Three Mile Island Nuclear Station
Middletown, Pennsylvania 17057

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Organization Plan - TMI-2

Enclosed please find a revised Organization Plan for the management of the TMI-2 Recovery Operations. The Plan includes changes at the GPU corporate level that establishes the GPU Nuclear Group. The primary objective of the GPU Nuclear Group is to operate and maintain the GPU nuclear plants safely and in accordance with all applicable laws, regulations, licenses and Technical Requirements. Organizational changes have also been made at the plant level to affect improvements in the management of plant operations.

The enclosed change justification provides the basis for this Organization Plan Change Request. We will be pleased to discuss this change request with you at a mutually agreeable time. Your prompt approval is requested.

Sincerely,

G. K. Hovey
Director, TMI-2

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CC: [REDACTED]

Enclosures (2)

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ORGANIZATION PLAN

TMI-2

ORGANIZATION PLAN - TMI-2

1.0 Organization

The organization described in this Plan provides the necessary functional relationships to support the recovery of TMI-2. This Plan provides the organizational structure for management of unit operation and recovery in addition to that organization for unit support in the functions of engineering and administration.

1.1 GPU Nuclear Group

The GPU Nuclear Group organization chart is shown in Figure 1.1. This group provides engineering, management and administrative support for the operation and recovery of TMI-2.

1.2 TMI-2 Organization

The TMI-2 organization chart is shown in Figure 1.2. This group performs those necessary activities associated with operations, maintenance, and recovery of TMI-2 in addition to engineering and administrative support.

2.0 Administration

2.1 Plan Approval and Audit

- 2.1.1 The TMI-2 Organization Plan and changes thereto shall be approved by the Chief Operating Executive of the GPU Nuclear Group.
- 2.1.2 Changes to the Organization Plan shall be submitted to the NRC for approval prior to implementation.
- 2.1.3 The QA Department shall conduct normal annual audits to verify conformance of the organization with the plan.

2.2 Technical Specification Title Cross-Reference

Currently, the TMI-2 Recovery Technical Specifications identify individuals by title that appear by other titles in the Organization Plan. The below cross-reference is provided:

- 2.2.1 The TMI Generation Group specified in Section 6.2 of the Technical Specifications is equivalent to the GPU Nuclear Group specified in this Organization Plan.
- 2.2.2 The Supervisor-Station Training specified in Section 6.4 of the Technical Specifications is equivalent to the Director, Training and Operations Support, specified in this Organization Plan.

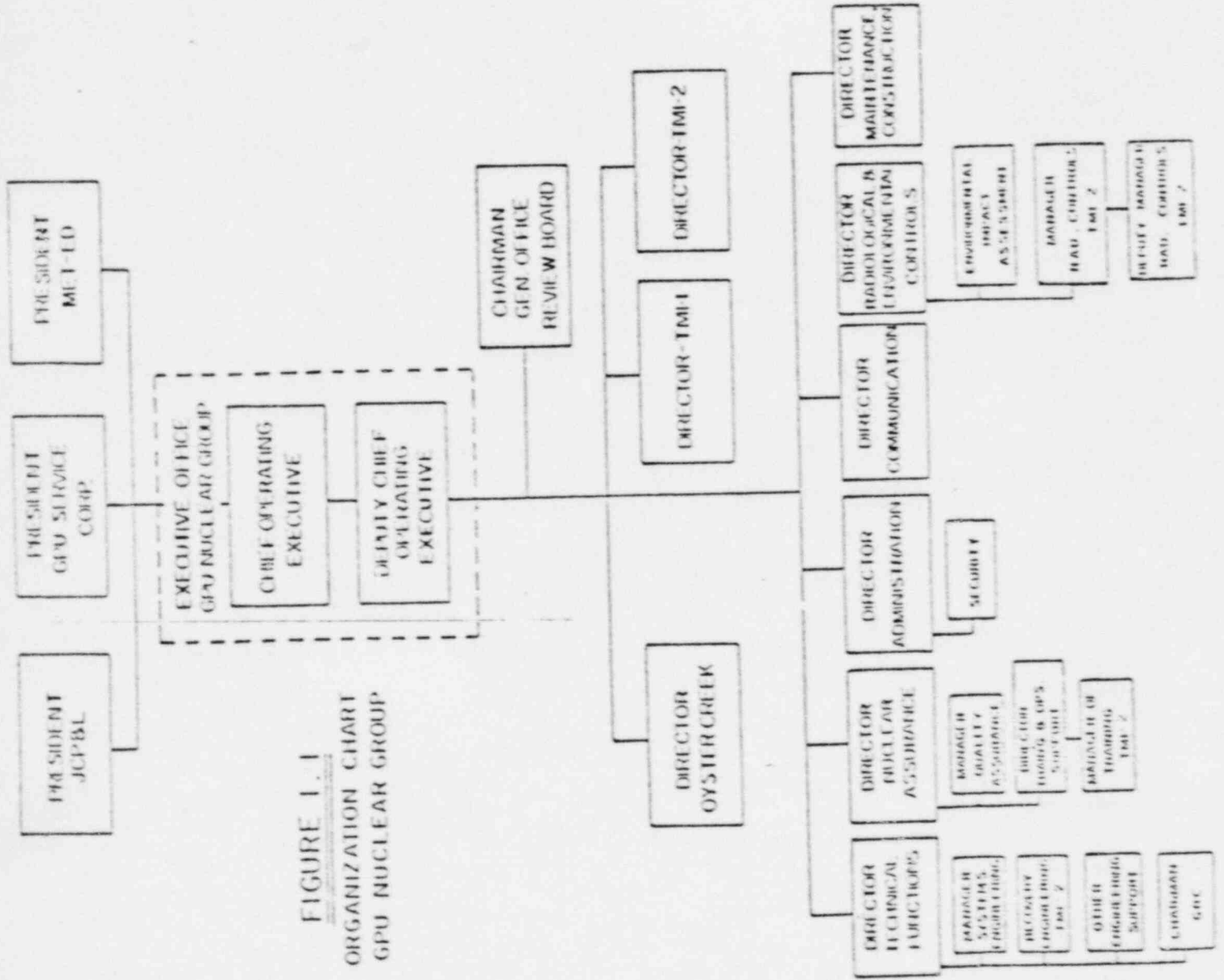
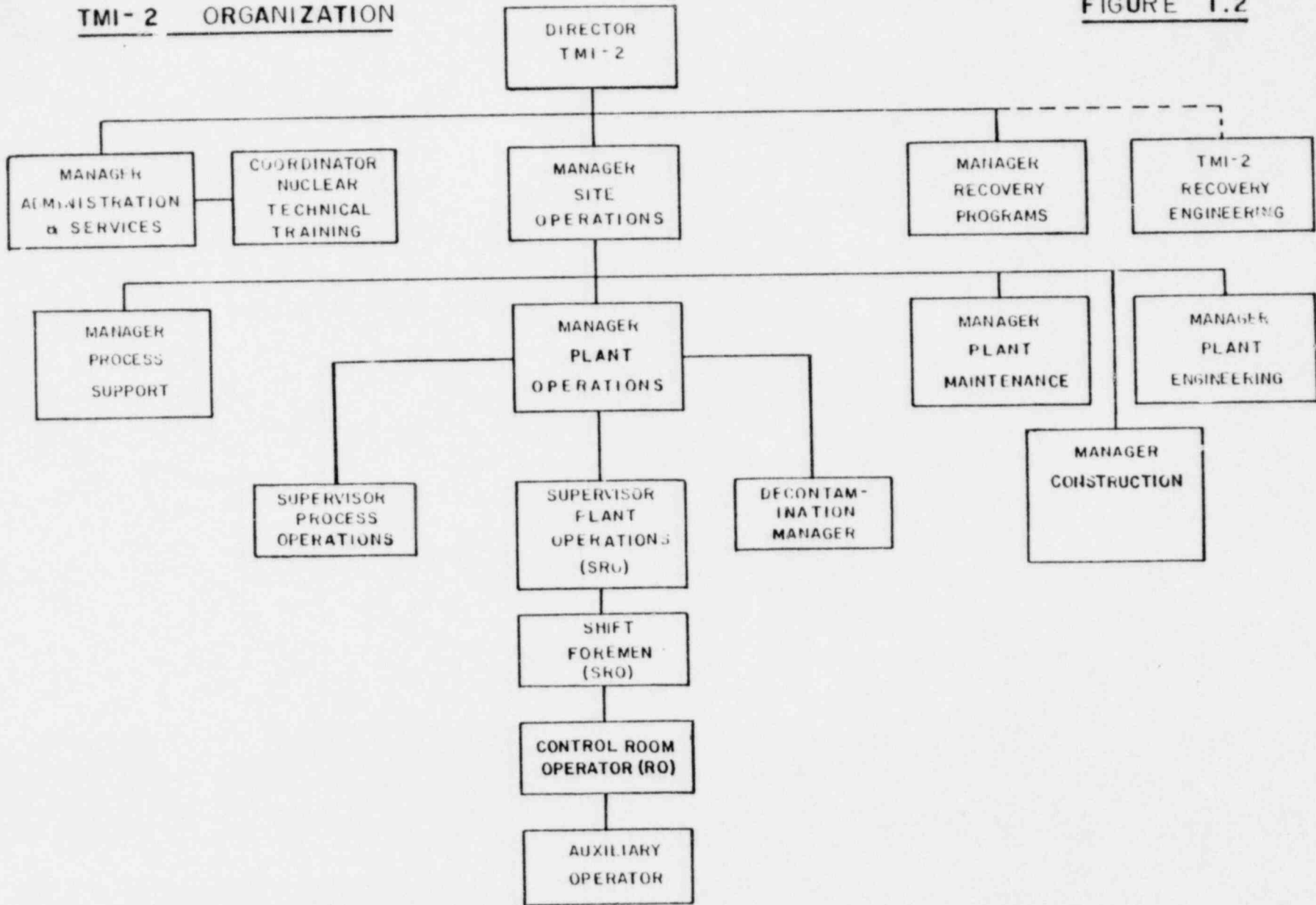


FIGURE 1.1
 ORGANIZATION CHART
 GPU NUCLEAR GROUP

TMI-2 ORGANIZATION

FIGURE 1.2



ORGANIZATION PLAN

CHANGE REQUEST JUSTIFICATION

TMI-2

ORGANIZATION PLAN CHANGE REQUEST JUSTIFICATION

1.0 Organization

The organization described in the Organization Plan has been devised to permit the effective management of the many technical requirements associated with the recovery of TMI-2. As the recovery of the unit progresses, work function priorities are changed to permit the continuation of recovery operations in an expeditious manner. This proposed change of the TMI-2 Recovery Organization will permit improved management of the many technical functions associated with recovery of the unit.

1.1 GPU Nuclear Group

Figure 1.1 of the Plan shows the organizational relationships that exist in the GPU Nuclear Group. This group will be formed by combining the technical and management resources of the Met-Ed, Jersey Central Power and Light (JCP&L), and GPU Service Corporation Generation Divisions which are being applied to nuclear activities into a single organizational entity.

The GPU Nuclear Group, through substantially increased total staffing, will strengthen the overall management capability and provide greatly increased technical resources for the restart of TMI Unit 1 the recovery of TMI Unit 2, and the operation of Oyster Creek.

The primary objective of the GPU Nuclear Group is to operate and maintain the GPU Nuclear plants safely and in accordance with all applicable laws, regulations, licenses and Technical Requirements.

The formation of the Group will take advantage of the wealth of nuclear experience represented by management and technical staff from within the GPU Service Corporation, Metropolitan Edison Company, and Jersey Central Power and Light. The Group is being further strengthened by the addition of experienced managers and professionals at all levels of the organization.

Also, the GPU Nuclear Group will provide greater advantages of centralization of nuclear expertise, including:

- The ability to focus greater expertise on any area on short notice.
- Increased proficiency under emergency conditions due to pre-existing working relationships.
- Personnel policies and procedures appropriate to nuclear activities.

There are senior management personnel with an average technical experience of well over twenty (20) years reporting to the head of the GPU Nuclear Group in the areas of:

- TMI-1 Operations
- TMI-2 Recovery
- Oyster Creek Operations

- . Technical Functions
- . Radiological and Environmental Controls
- . Administration
- . Construction and Maintenance
- . Communications
- . Nuclear Assurance

Various steps have been taken in this reorganization to strengthen key functions in the operation and support for Unit 2. Examples of this are:

- . The line management responsibilities for TMI Units 1 and 2 are completely separated.
- . Each TMI unit is to the maximum extent feasible, to have direct control of the resources necessary for effective and safe conduct of the plant activities.
- . The person in charge of TMI-2 decontamination and recovery, the Director of TMI-2, is based full time at TMI.
- . The TMI-2 operations organization specifically gives the Manager, Site Operations, the responsibility for operations and maintenance and relieves him of the direction of administration, training and radiation protection functions.
- . The radiological control function for Unit 2 reports directly to the Director, Radiological and Environmental Controls.
- . The GPU Service Corporation and Metropolitan Edison Company, and Jersey Central Power and Light Quality Assurance and Control organizations are being merged, and Operating Quality Assurance for the TMI units and Oyster Creek will be their major function.

Attachment 1 to this Organization Plan Change Request Justification provides the responsibilities and primary functions performed by the Directors of the GPU Nuclear Group.

1.2 TMI-2 Organization

The Director, TMI-2 utilizes the following management staff to carry out his responsibilities:

- . Manager, Site Operations
- . Manager, Recovery Programs
- . Manager, Administration and Services

The organizational relationship for the TMI-2 organization is shown in Figure 1.2 of the Plan.

The Manager, Site Operations, has the overall responsibility for the day-to-day operation and maintenance of the plant and the recovery systems. He is assisted in the performance of this responsibility by the Manager, Plant Operations; Manager, Plant Maintenance; Manager, Plant Engineering; Manager, Process Support; and Manager, Construction. Their basic responsibilities are as follows:

- . The Manager, Plant Operations is responsible for maintaining the TMI-2 reactor in a safe, stable condition throughout decontamination and recovery evolutions, operating plant systems, providing licensed operation surveillance and approval of recovery operations, operating radwaste systems and packaging waste for storage and ultimate disposal and conducting decontamination operations in the auxiliary and fuel handling buildings.
- . The Manager, Plant Maintenance is responsible for providing designated maintenance and repair services to the TMI-2 site and for the orderly layup of plant equipment and systems not needed for the recovery program.
- . The Manager, Plant Engineering is responsible for providing plant engineering services and support to plant operations and maintenance, chemistry services, fire protection engineering services and insuring adequate fire protection capability is maintained at TMI-2.
- . The Manager, Process Support is responsible for process engineering services and support to all TMI-2 radwaste processing operations, insuring that radwaste generated is properly packaged, stored and prepared for shipment and arranging for the orderly and timely shipping of radwaste to disposal sites.
- . The Manager, Construction is responsible for construction management and providing construction engineering services for construction work assigned as a GPU responsibility and for providing maintenance, repair and utility services not provided by plant maintenance.
- . The Manager, Recovery Programs acts as program manager and provides overall direction and control for contractor efforts in decontamination and recovery of the TMI-2 containment building and construction of auxiliary facilities to support recovery.
- . The Manager, Administration and Services is responsible for preparing, issuing and updating TMI-2 administration procedures, coordinating and expediting TMI-2 non-administrative procedures and coordinating training provided by the Nuclear Assurance Division.

THREE MILE ISLAND UNIT 2 DIVISION

SUMMARY OF RESPONSIBILITIES

- Operate, maintain, and conduct decontamination and recovery operations of TMI-2 in a safe and efficient manner in conformance with corporate policies and all applicable laws, regulations, licenses, and technical requirements. This includes construction of required facilities.

MAJOR FUNCTIONS

- Establish and maintain plant level policies, procedures and practices related to the decontamination, recovery, operation and maintenance of the plant.
- Provide and maintain a plant staff qualified to decontaminate, recover, operate, and maintain the plant.
- Operate and maintain all systems and equipment required for decontamination, recovery, and layup of systems in a safe, reliable, and efficient manner.
- Decontaminate and clean up the water and decontamination fluids in a safe and efficient manner.
- Direct and control the plant recovery program.
- Direct and control the construction of facilities required for the decontamination and recovery programs.
- Establish and implement preventative and corrective maintenance programs to assure that the plant is maintained in a safe and reliable status.
- Assure that all plant activities are carried out in accordance with Corporate Radiation Control, Quality Assurance, Security and Emergency Preparedness programs.

OYSTER CREEK DIVISIONSUMMARY OF RESPONSIBILITIES

- Operate and maintain the Oyster Creek plant in a safe, reliable, and efficient manner in accordance with corporate policies and all applicable laws, regulations, licenses, and technical requirements.

MAJOR FUNCTIONS

- Establish and maintain plant level policies, procedures, standards, and practices related to the operation and maintenance of the plant.
- Provide and maintain a plant staff qualified to operate and maintain the plant in accordance with corporate policies and all applicable laws, regulations, licenses, and technical requirements.
- Operate the plant in a safe, reliable, and efficient manner in accordance with corporate procedures, the electrical needs of the GPU System, all applicable laws, regulations, licenses, and technical requirements.
- Establish and implement preventative and corrective maintenance programs to maintain the station in a safe, reliable, and efficient manner in accordance with corporate policies and all applicable laws, regulations, licenses, and technical requirements.
- Ensure that plant operations and maintenance activities are carried out in accordance with Corporate Radiation Control, Quality Assurance, Security and Emergency Preparedness Programs.

THREE MILE ISLAND UNIT 1 DIVISIONSUMMARY OF RESPONSIBILITIES

- Operate and maintain the TMI-1 plant in a safe, reliable, and efficient manner in accordance with corporate policies and all applicable laws, regulations, licenses, and technical requirements.

MAJOR FUNCTIONS

- Establish and maintain plant level policies, procedures, standards, and practices related to the operation and maintenance of the plant.
- Provide and maintain a plant staff qualified to operate and maintain the plant in accordance with corporate policies and all applicable laws, regulations, licenses, and technical requirements.
- Operate the plant in a safe, reliable, and efficient manner in accordance with corporate procedures, the electrical needs of the GPU System, all applicable laws, regulations, licenses, and technical requirements.
- Establish and implement preventative and corrective maintenance programs to maintain TMI-1 in a safe, reliable, and efficient manner in accordance with corporate policies and all applicable laws, regulations, licenses, and technical requirements.
- Ensure that plant operations and maintenance activities are carried out in accordance with Corporate Radiation Control, Quality Assurance, Security and Emergency Preparedness Programs.

TECHNICAL FUNCTIONS DIVISIONSUMMARY OF RESPONSIBILITIES

- Assure technical and regulatory adequacy of all aspects of nuclear activities to provide safe, reliable, and efficient operations in accordance with corporate policies and all applicable laws, regulations, licenses, etc.

MAJOR FUNCTIONS

- Perform, manage, and direct all out-of-plant engineering, design, safety analysis, and plan and direct startup and test activities.
- Maintain all plant technical basis and configuration control documents including fuel management.
- Control and perform interface activities with regulatory groups.
- Perform plant technical monitoring/assessment/productivity analysis, including major equipment failure analysis.
- Prepare/review/concur with all engineering and licensing procedures and licensing document correspondence and prepare SAR's, Technical Specifications, and Environmental Specifications.
- Specify, manage, and direct all nuclear fuel material, conversion, enrichment, and fabrication contractors.
- Review and assess the safety significance of NRC notices, bulletins, reports, and plant operating experience information.
- Provide and direct operating plant shift technical advisors.
- Review and concur in all plant operating, alarm and emergency procedures for technical adequacy.
- Review and concur on technical requirements for training programs.

NUCLEAR ASSURANCE DIVISIONSUMMARY OF RESPONSIBILITIES

- Monitor all nuclear activities to assure that they provide the required high degree of safety and reliability and are carried out in accordance with corporate policies and applicable laws, regulations, licenses, and technical requirements.
- Provide training of corporation personnel as needed to carry out their duties and to meet corporate policies and all applicable laws, regulations, licenses, and technical requirements.
- Provide support to the operating stations in the areas of emergency planning and analytical laboratory services.

MAJOR FUNCTIONS

- Monitor, evaluate, and assure that all activities having the potential for compromising nuclear safety are adequately addressed.
- Provide and maintain the qualified personnel to develop and administer the Operational Quality Assurance program and assure that it is implemented in all activities important to safety.
- Develop and implement all necessary general employee, operator, technician, and management training programs.
- Develop the site emergency plans and assure that emergency plans' preparedness is maintained.
- Provide the generating stations with chemistry and metallurgical analytical services and recommended chemistry requirements and specifications.

RADIOLOGICAL AND ENVIRONMENTAL CONTROLS DIVISIONSUMMARY OF RESPONSIBILITIES

- Establish and implement uniform radiological and environmental policies, practices, and procedures required to assure safe, reliable, and efficient operation in accordance with corporate policies and all applicable laws, regulations, and licenses.

MAJOR FUNCTIONS

- Establish and maintain corporate level policies, procedures, standards, and practices related to radiological and environmental activities.
- Provide the personnel, procedures and administrative controls to implement the plant radiation and environmental protection programs.
- Provide administrative and technical guidance applicable to radiation protection, radioactive materials, respiratory protection, and radiological engineering including ALARA programs and dosimetry control.
- Provide administrative and technical guidance applicable to environmental protection, environmental monitoring and NPDES.

MAINTENANCE AND CONSTRUCTION DIVISIONSUMMARY OF RESPONSIBILITIES

- Establish and monitor uniform policies, practices, and procedures for all maintenance, repair, and construction activities in accordance with corporate policies and all applicable laws, regulations, and licenses and technical requirements.
- Carry out assigned plant modifications, repair and construction activities and conduct major and specialized maintenance work in accordance with corporate policies and all applicable laws, regulations, and licenses and technical requirements.

MAJOR FUNCTIONS

- Monitor, evaluate, and assure that maintenance activities at the Generating Stations are being performed in accordance with corporate policies, procedures, and good maintenance practices.
- Establish and maintain the necessary corporate level maintenance and construction procedures, standards, and practices for the performance of maintenance and construction activities.
- Plan, schedule, and direct plant modifications, plant construction projects, and major and specialized maintenance jobs.
- Plan, schedule, and direct major and special maintenance and construction activities involved in planned and forced outages.
- Develop and implement a formal methods improvement/productivity program.
- Develop preplanned methods, planning and support for forced outages.

COMMUNICATIONS DIVISIONSUMMARY OF RESPONSIBILITIES

- Establish and implement policies and programs for communications with the news media, local government, citizens groups, and individuals during both normal and emergency conditions in accordance with corporate policies and applicable regulations, etc.
- Establish and implement policies and procedures which assure information of general interest to employees is disseminated fully, effectively, and in a timely manner.

MAJOR FUNCTIONS

- Monitor, evaluate, and assure that appropriate communications with outside organizations or individuals which are not the specific responsibility of other functional divisions are established and maintained.
- Establish and maintain corporate level policies, procedures, standards, and practices relating to internal and external communication of other functional divisions with news media, local governments, citizens groups, etc.
- Establish and maintain contacts within local government, and citizen groups to assure effective communications between those organizations and the corporation.
- Coordinate communications activities with General Public Utilities, the GPU Service Corporation, and the operating companies.
- Support the development of a positive attitude on the part of local officials and the local public toward the presence, role in the community, and safety of the GPU Nuclear Corporation operating plants.

ADMINISTRATION DIVISIONSUMMARY OF RESPONSIBILITIES

- Provide in an efficient and reliable manner and in accordance with corporate policies and all applicable laws, regulations, licenses, and other requirements, all required business-management and administrative support services for prudently conducting the activities of the GPU Nuclear Group.

MAJOR FUNCTIONS

- Assemble, review and issue budgets on a corporate-wide basis and regularly monitor and report projects progress and expenditures against capital and O&M budgets and associated work plans.
- Provide materials management services including contracting and procurement, contract administration, warehousing, and inventory control on a corporate-wide basis.
- Develop and administer security, facilities, services, and industrial safety programs directed to creating a safe, convenient, and protected environment for company employees and property in accordance with corporate policies and all applicable laws, regulations, licenses, and other requirements.
- Provide human resources personnel services in the areas of recruiting, indoctrination and orientation of new employees, wage and salary administration, career counselling and planning, employee benefits administration, employee relations services for professional employees and bargaining units, EEO and other employee relations and retention programs.
- Negotiate and administer union contracts and grievance and arbitration processes.
- Prepare, review, coordinate, and issue corporate administrative policies and procedures.
- Provide information, management and documentation control services.
- Provide legal services in support of the group operations including pre-submission reviews of major purchase transactions and vendor negotiations, support litigation and arbitration or administrative proceedings and review, as applicable, proposed corporate administrative policies and procedures.