

POOR ORIGINAL

SEP 15 1980

NRC/TMI-80-132

Distribution:

DN 50-320

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Docket No. 50-320

Mr. R. C. Arnold
Senior Vice President
Metropolitan Edison Company
100 Interpace Parkway
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Dear Mr. Arnold:

This is to acknowledge receipt of your letter (TLL 390 of August 26, 1980) which expressed your intention concerning the operation and location of EPICOR I. We do not concur with your conclusion that NRC review of procedures has been adequate for the processing of TMI-2 non-accident generated water by EPICOR I.

As of September 5, 1980, Procedure Change Request (PCR) No. 80-310 has not been approved by us since your organization has not resolved an outstanding comment on this PCR. In summary, the PCR attempts to delete Station Procedure 3104-4.3 governing the operation of EPICOR I and replace it with a Unit I procedure (1104-29X). The Unit I index of September 2, 1980, indicates 1104-29X has been issued (post July 24, 1980). It appears you now have two effective procedures governing the operation of the subject system. However, we understand the system is operated by the procedure approved by the NRC (3104-4.7).

It is our position that as long as EPICOR I is processing Unit 2 water (although non-accident water) it is to be operated by a procedure that has been submitted for review and approval to the onsite staff on a pre-implementation basis (in accordance with the Order of February 11, 1980). We are requesting that you indicate what measures are available to assure that the EPICOR I system will not be operated by the now effective (but not NRC reviewed) Unit I procedure 1104-29X.

Original signed by

Ronald R. Bellamy for
John T. Collins
Deputy Program Director
TMI Program Office

cc: See Service Distribution List

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