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R. Conte

NOV 3 1980

MEMORANDUM FOR: D. Neely, Team Leader, Unit 1 Health Physics Evaluation, Region I

THRU: A. N. Fasano, Chief, Site Operations Section, TMI Program Office

FROM: R. J. Conte, Senior Resident Inspector, TMI-2, Site Operations Section, TMI Program Office

SUBJECT: UNIT 1 HEALTH PHYSICS EVALUATION

Based on our discussions over the past several weeks, it is the understanding of the onsite staff that the subject evaluation is to be issued under Docket Number 50-289 only. We are familiar with the findings of the evaluation and we concur with you that a majority of these findings are the responsibility of the TMI-2 radiological controls department. Since many of these findings apply to TMI-2, particularly in the areas of respiratory protection, dosimetry and radwaste shipments, we are concerned about not identifying them to the management of TMI-2. It would be non-productive for the onsite radiation specialists to reverify findings that have already been proven to be the responsibility of TMI-2.

It is not understood how we as the NRC could ignore attributing these findings to TMI-2 management when they are a licensee also. Considering TMI-2 as providing contract services does not appear to be a valid reason. The use of the Unit 2 docket number on your report is a viable option which I understand has, by decision, been eliminated. Another option is to maintain separation of unit inspection reports but clearly address the commonality of the subject findings as was done by Mr. Stello for the 50-320/79-10 inspection report. In the cover letter dated October 25, 1979, to Metropolitan Edison, he applied the TMI-2 accident noncompliance items to TMI-1. He stated: "Because of the similarity of Units 1 and 2 and commonality of management of the two units, corrective action taken in response to this letter and its enclosures must be equally applicable to Units 1 and 2."

In conclusion, I recommend that the Unit 1 Health Physics evaluation be issued under Docket Numbers 50-289 and 50-320 with a cover letter having a paragraph as follows: "Further, we are concerned that many deficiencies noted in this report apply to the Radiation Protection Program of the TMI-2 radiological controls department. Therefore, in your response please address improvements made or planned in the TMI-2 Radiation Protection Program for each of the findings identified as a result of the Unit 1 review. For those items that you state are not applicable to Unit 2, a specific justification should accompany such evaluations.

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NRC Form 318B (4-79) NBCM 0240 ★U.S. GOVERNMENT PRINTING OFFICE: 1979—281-804

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A management position in this area is requested.

R. J. Conte
Senior Resident Inspector, TMI-2
Site Operations Section
TMI Program Office

cc: B. H. Grier
J. T. Collins
D. R. Haverkamp
G. H. Smith
M. M. Shanbaky

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