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July 29, 1993  
C311-93-2113  
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U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Dear Sir:

Subject: Three Mile Island Nuclear Station, Units 1 & 2 (TMI-1 & TMI-2)  
Operating License Nos. DPR-50 & DPR-73  
Docket Nos. 50-289 & 50-320  
Implementation of Training Rule for TMI-2

NRC letter dated June 25, 1993, requested Licensees of plants in the decommissioning process to evaluate training needs considering the specific conditions at the facility. This was further discussed in a conference call with NRC Staff and concerned licensees on July 7, 1993.

GPU Nuclear is currently completing preparations to place TMI-2 in Post-Defueling Monitored Storage (PDMS). The plant, currently in Mode 3, has been defueled and decontaminated to a safe and stable condition where the facility poses no risk to public health and safety. There is no credible possibility of a nuclear criticality, all fuel and core debris which was removed from the Reactor Vessel and associated systems have been shipped off-site, the Reactor Coolant System and the Fuel Transfer Canals have been drained to the extent practical and the plant is completing the packaging and staging for shipment of the radioactive waste from major cleanup activities. The plant is currently completing the disposition of Accident Generated Water. This task, although not a prerequisite to PDMS, is expected to be completed during the third quarter of 1993, prior to entry into PDMS. Accident analyses for Mode 3 have determined that any potential release of radioactive materials will be a small fraction of 10 CFR Part 100 off-site dose limits. TMI-2 is expected to enter PDMS during the fourth quarter of 1993. During PDMS, potential radioactive releases will be within 10 CFR 50 Appendix I guidelines.

TMI-2 conducted training programs to qualify personnel for work in the plant. However, these programs were not SAT-based. With only a small amount of work currently being performed, and even less to be accomplished once the plant is in PDMS, establishing SAT-based training programs now is not warranted.

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By comparison, TMI-1, which will assume responsibility for maintenance of the TMI-2 configuration and compliance with TMI-2 license requirements when TMI-2 enters PDMS, does have SAT-based and INPO accredited programs for all the personnel categories contained in the new training rule. Many of the personnel currently working in TMI-2 are participating in TMI-1 programs. Upon entering PDMS, these personnel will be appropriately enrolled in the TMI-1 Training Programs.

Therefore, GPU Nuclear proposes that TMI-2 should be exempted from SAT-based training programs for all categories identified in the new training rule (10 CFR 50.120). Further the NRC should, on its own motion, issue such an exemption for TMI-2. A description of each training category, as it applies to TMI-2, and the basis for exemption from a SAT-based program is contained below.

1) Non-Licensed Operators

The auxiliary operators currently assigned to TMI-2 were previously qualified to work in the TMI-2 (although not through a SAT-based program). On entering PDMS, all or most of these individuals will become TMI-1 auxiliary operators and will be expected to complete the accredited non-licensed operator training and qualification program.

In preparation for PDMS, TMI-1 auxiliary operators have attended classroom training and plant walkthroughs on selected TMI-2 systems. Prior to PDMS, they will complete qualification guides on those systems.

Adequate programs are in place and no separate SAT-based TMI-2 program is considered necessary.

2) Shift Supervisor

There are no shift supervisors in the sense of the INPO Shift Supervisor Program at TMI-2. The shift foreman are experienced individuals with operations or maintenance backgrounds. It should be noted that there are no licensed operators at TMI-2.

This category is not applicable to the current or future conditions at TMI-2.

3) Shift Technical Advisor

This position does not exist at TMI-2.

4) Instrument and Control Technicians, and Electrical and Mechanical Maintenance Personnel

Currently there are two instrumentation and controls technicians, two electricians, and two mechanics assigned to TMI-2. These individuals were previously qualified to work in TMI-2 (although not through a SAT-based program) and possess years of TMI-2 specific experience. Additionally, they have been qualified to the SAT-based training and qualification standards of the TMI-1 accredited training programs.

Assigned to the TMI-1 Maintenance Department are additional personnel who were previously assigned to TMI-2 who possess the experience to work on TMI-2 equipment and have been qualified to TMI-1 SAT-based accreditation standards. As systems are turned over to TMI-1, additional training needs can be addressed and TMI-1 maintenance department personnel trained, as appropriate.

Adequate programs are in place and no separate SAT-based TMI-2 program is considered necessary.

5) Radiological Protection Technician

All GPU Nuclear radiation protection technicians at TMI have completed the accredited TMI-1 training and qualification program. All technicians attend continuing training which also addresses changes to the plants and plant and industry experience. Basic technical skills required for TMI-2 support are addressed.

Adequate programs are in place and no separate SAT-based TMI-2 program is considered necessary.

6) Chemistry Technician

All chemistry technicians supporting TMI-2 are assigned to TMI-1 and have completed the accredited TMI-1 training and qualification programs. All technicians attend continuing training which also addresses changes to the plants and plant and industry experience. Basic technical skills required for TMI-2 support are addressed.

Adequate programs are in place and no separate SAT-based TMI-2 program is considered necessary.

7) Engineering Support Personnel

There is no TMI-2 specific Engineering Support Personnel (ESP) Program.

On entering PDMS, TMI-2 engineers will be assigned to the TMI-1 Plant or to Technical Functions Division. In addition, personnel in other departments will be transferred from TMI-2 to Site Services. These personnel will be enrolled in the TMI-1 ESP program, as appropriate.

Based on the above training needs assessment, GPU Nuclear has concluded that establishment of a SAT-based training program in accordance with the Training Rule (10 CFR 50.120) is not warranted. Further the NRC Staff action to grant, on its own motion, an exemption from this requirement for all categories of personnel for TMI-2 is appropriate.

Sincerely,



f R. L. Long  
Vice President and Director TMI-2

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Attachments

cc: R. W. Hernan - NRC Senior Project Manager, TMI-1  
M. T. Masnik - NRC Project Manager, TMI-2