



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

November 21, 1990

Dr. Robert L. Long  
Director, Corporate Services/  
Director, TMI-2  
GPU Nuclear Corporation  
Post Office Box 480  
Middletown, Pennsylvania 17057

SUBJECT: TMI FIRE BRIGADE TRAINING

Dear Dr. Long:

The NRC staff has completed its review of your June 1, 1990 request to change the fire brigade drill requirements for the TMI site.

The October 30, 1985 letter to H. Hukill, GPU from J. Stolz contained a Safety Evaluation Report (SER) authorizing the use of a site fire brigade to serve both TMI-1 and TMI-2. Currently, the October 30, 1985 SER specifies that each member of the fire brigade, approximately 108 personnel, must participate in four fire brigade drills per year with two drills in Unit 1 and two drills in Unit 2. The fire brigade personnel are all shift workers and currently they are all on a six shift rotation. Each shift receives one drill per quarter for a total of 24 possible drills per year.

GPU Nuclear has requested that the requirement that each individual receive two drills in TMI-2 per year to remain qualified be deleted. All other training requirements specified in the SER would not be changed. The licensee proposes replacing the "two drills per year per person" requirement for TMI-2 to a "one drill per shift per year" requirement. Each shift would still have four drills per year, three in Unit 1, and one in Unit 2. With six shifts and five people comprising the fire brigade, a maximum of 30 people per year will respond to a fire drill in Unit 2.

The individual requirement would be a minimum of two drills per year in Unit 1; however, as a practical matter, each person would participate in four drills per year with at least two in Unit 1. However, it could be possible that all four drills performed would be in Unit 1 and none in Unit 2. The requirements to cover TMI-2 fire systems, fire fighting pre-planned strategies and procedures and to provide familiarization tours as part of both the initial fire brigade training and requalification training programs will remain unchanged.

GPU Nuclear believes that the proposed change is appropriate now that TMI-2 is defueled. On April 27, 1990, the NRC staff concluded that the possibility of a criticality event at TMI-2 has been precluded and that the facility has been defueled to the extent reasonably achievable. Furthermore, no canisters containing core material are located on the TMI-2 site. GPU Nuclear has determined that there are no systems or components that need to be safeguarded that would affect the safe shutdown of the facility. No systems or components are presently required to maintain the subcritical condition of the facility. Fire Protection measures at TMI-2 is provided to prevent or minimize the release of radioactive material due to fire in contaminated areas and to minimize the

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Dr. F. L. Long

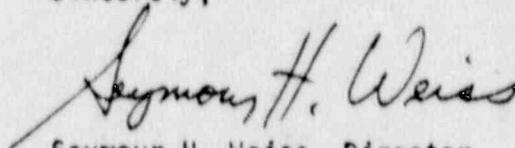
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impact of fire on current Technical Specification required instrumentation. Additionally, GPU Nuclear is in the final stages of the current cleanup effort and is periodically removing combustibles from the facility thereby lessening the fire hazard.

The NRC staff has reviewed your proposal and finds the concept of reducing the requirement for drills in TMI-2 appropriate given the current status of the fire hazard and the lack on any need to maintain systems or components necessary for the safe shutdown of the facility. The staff however, is concerned that there maybe the possibility, depending on how the watch list is drawn up, that no member of a fire brigade responding to a real fire has had a drill in TMI-2 within the past year or possibly longer. The staff is concerned as time goes on that there will be a lack of familiarity with the layout, conditions, and special considerations associated with Unit 2. The staff met with the licensee on September 27, 1990, to discuss the staff's concerns. It was agreed that GPU Nuclear would modify its request and include an additional requirement that all eight of the fire brigade leaders will be required, in addition to the requirements imposed by the licensee's proposed change, to participate in at least one drill per year in Unit 2. Your commitment to the above additional requirement is documented in your November 9, 1990 letter to the NRC from H. Hukill.

The staff, therefore, approves your proposal with the additional requirement as specified above. This change modifies the staff's October 30, 1985 Safety Evaluation Report on the issue of TMI fire brigade training.

Sincerely,



Seymour H. Weiss, Director  
Non-Power Reactors, Decommissioning and  
Environmental Projects Directorate  
Division of Reactor Projects  
and Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

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Original signed by:

Seymour H. Weiss, Director  
Non-Power Reactors, Decommissioning and  
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Division of Reactor Projects  
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Office of Nuclear Reactor Regulation

cc: See next page

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