



File TMI-2
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Writer's Direct Dial Number

February 8, 1980
TLL 037

TMI Support
Attn: R. Vollmer, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit II (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Modifications of Technical Specifications Section 6

Enclosed please find modifications to Section 6.0 of the proposed Technical Specifications. Your letter of January 15, 1980 concluded that the previous modification to this Technical Specification was unacceptable since no basis or analysis was provided to justify that the proposed modification would "provide an equivalent or greater degree of assurance that the health and safety of the public would be protected."

We have subsequently made additional modifications to the subject document which we feel will alleviate your concern. The basis for these modifications follows.

The TMI Operational Quality Assurance Program and Technical Specifications are being upgraded to comply with the regulatory position in Regulatory Guide 1.33 Revision 2. This regulatory guide endorses ANSI N18.7-1976.

Our present Plant Operations Review Committee (PORC) procedure review requirements have been the subject of an internal evaluation. Currently, PORC review is required for all procedures and instructions which are important to safety. The large number of procedures and instructions requiring PORC review is not conducive to achieving the timely, detailed safety evaluation desired by the licensee. Consequently, the effectiveness of the PORC is diluted. To alleviate this situation, we plan to limit the procedure review requirements of PORC to those reviews required by Regulatory Guide 1.33 Revision 2.

We feel that the procedure review requirements specified in Regulatory Guide 1.33 Revision 2 are adequate to meet the intent of 10CFR50 Appendix B. These requirements provide the levels of review necessary to insure affected documents comply with appropriate policies and regulations. Unreviewed

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safety questions and technical specification changes will receive adequate reviews by safety review committees. We have also revised section 6.3 Unit Staff Qualifications so that the personnel requirement of meeting Regulatory Guide 1.8 is consistent with the Three Mile Island Nuclear Station, Unit II Radiation Protection Plan.

Additionally, in response to your letter of January 14, 1980, concerning the Organization Plan, we are requesting that Section 2.1.3 of the plan be revised to state: "Changes to the Organization Plan shall be reviewed with the NRC prior to implementation."

Sincerely,

R. F. Wilson

R. F. Wilson
Director, TMI-II

RFW:CFM:hah

Attachments

cc: J. T. Collins