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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: Three Mile Island Nuclear Station, Unit No. 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Safety Evaluation for Compliance with 10 CFR 50.62
Anticipated Transient Without Scram (ATWS) (TAC No. 59151)

By letter dated December 7, 1989, the Staff transmitted the subject Safety Evaluation Report (SER) by the Office of Nuclear Reactor Regulation (NRR) to GPU Nuclear (GPUN) Corporation. This letter serves to revise GPUN's commitment with regard to SER Item No. 5 "Quality Assurance for Test, Maintenance, and Surveillance" (Page 5), which states:

"The licensee stated that... 'a standard note will be added to each applicable drawing identifying specific hardware diversity requirements.' (in order that) ATWS equipment continue to be in compliance with the ATWS rule..."

GPUN now intends to maintain ATWS/RTS equipment diversity using a different but similar programmatic approach. The original commitment to add a note to each applicable drawing would not ensure the desired end result, and would be cumbersome to implement. Whereas, our new approach takes advantage of the company's computer-based programs which are required to be used for component repair, replacement, modification, and/or design changes.

The revised GPUN approach involves two steps. The UFSAR will be updated to include an explanation of the ATWS/RTS diversity requirements as applicable to any modification or design change which would be implemented in accordance with the provisions of 10 CFR 50.59. The computer-based system used to control repairs/replacements will display the applicable ATWS/RTS component tag numbers identified as requiring ATWS diversity. Additionally, the Quality Control List (QCL) of the same computerized database will be cross-referenced to the applicable section of the UFSAR.

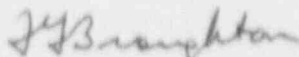
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The computer-based engineering and design database programs containing the QCL have been updated to reflect the ATWS diversity requirements for the applicable ATWS/RTS component tag numbers and references to the UFSAR. The UFSAR changes will be incorporated into the document at the next annual update of TMI-1's UFSAR scheduled to be submitted in July, 1992.

This change was discussed with the NRR Project Manager prior to the implementation of ATWS modifications during the 9R refueling outage.

Sincerely,



T. G. Broughton
Vice President and Director, TMI-1

GMG

cc: Region I Administrator
TMI-1 Senior Project Manager
TMI Senior Resident Inspector