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June 29, 1984
5211-84-2154

Office of Nuclear Reactor Regulations
Attn: John F. Stolz, Chief
Operating Reactors Branch No. 4
U. S. Nuclear Regulatory Commission
Washington D. C. 20555

Dear Mr. Stolz:

Three Mile Island Nuclear Station Unit I, (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Emergency Operating Procedures (EOP) Upgrade Program
Response to SER Questions
(NUREG 0737 Item, I.C.1)

This is in response to your letter of March 28, 1984 which included the Safety Evaluation Report (SER) on TMI-1's Plant Specific ATOG Procedures Generation Package (PGP).

Your letter with the enclosed SER concluded that the TMI-1 PGP was found to be acceptable, but required confirmatory documentation in two areas: 1) Writer's Guide and 2) Plant Specific Technical Guidelines (TDR-517).

The requested information in each of these areas is provided herein as follows:

1) Writer's Guide

The list of NRC items of concern which pertain to the Writer's Guide are addressed in the following TMI-1 procedures:

- AP 1001E, Writer's Guide for Abnormal Transient Procedures (ATPs).
- AP 1001D, Procedure Preparation.
- AP 1001G, Procedure Utilization.

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These procedures have been revised where necessary to address each of the items and are available at the TMI-1 site for inspection.

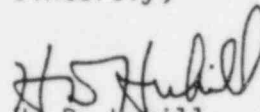
Attachment I provides specific references to each of the writer's guide items.

2) Plant Specific Technical Guidelines (TDR-517).

Attachment 2, TDR-517 (Rev. 1) addresses NRC's "Request for Additional Information TMI-1, PGP, Plant Specific Guidelines". Appendix A to TDR-517 (Rev. 1) provides a list of the questions followed by GPUN response.

This completes GPUN's response to NRC's SER questions on the ATOG Procedures Generation Package with the exception of questions 12 and 13 from Appendix A to the SER. As stated here in Attachment 2, GPUN has been working with the Electric Power Research Institute (EPRI) on analysis of steam generator tube ruptures. Although TDR-517 (Rev. 1) states that this work is expected to be completed in August 1984, GPUN feels that this schedule cannot be met. Complete responses to these items are now targeted for submittal in September 1984.

Sincerely,


H. D. Hukill,
Director, TMI-1

HDH/MRK/mle

Enclosures (2)

cc: R. Conte

ATTACHMENT I

REFERENCES TO NRC ITEMS OF CONCERN PERTAINING TO THE WRITER'S GUIDE FROM THE TMI-1 ATOG PROCEDURES GENERATION PACKAGE.

The following list identifies each item of concern pertaining to the Writer's Guide and gives the specific TMI-1 procedure reference where the item is addressed:

1. Format of the Abnormal Transient Procedures (ATPs) cover page and subsequent pages.

Ref:

AP 1001D provides instructions on procedure and page format.
AP 1001E, Section 3.2.2. provides additional guidance for ATPs.

2. Use of divisions, headings, numbering and tabulation.

Ref:

AP 1001D and AP 1001E, Section 3.2.2., provide additional guidance. AP 1001G addresses tabulation of the Control Room copy of ATPs.

3. Design of graphs and tables.

Ref:

AP 1001D provides additional guidance on graphs and tables.

4. Minimum use of references, and guidance on when a sub-set of another procedure should be included in the original procedure rather than referenced as an additional procedure to go to.

Ref:

AP 1001E, Sections 3.1.8, 3.1.9, and 3.1.10 provide additional guidance on references to other procedures.

5. Use of a scope section in an ATP or guidance on alternative methods of presenting this information.

Ref:

AP 1001E, Section 3.2.1.d.2 addresses the use of scope sections.

6. Presentation of entry conditions.

Ref:

AP 1001E, Section 3.2.1.d.1 addresses entry conditions.

7. Use of the following types of procedure steps:

- nonsequential steps
- equally acceptable steps
- recurrent steps.
- time-dependent steps.

Ref:

AP 1001E, Section 3.3.10 provides additional guidance on the use of the different types of procedure steps.

8. Presentation of procedure steps and cautions on a single page to avoid interruptions in the flow of information.

Ref:

AP 1001E, Section 3.2.2. includes instructions to avoid interrupted information flow.

9. Consistent use of logic statements with guidance to avoid variations in items such as the following:

- order in which the conditional phrase (e.g., IF statement) and the subsequent action (e.g., THEN statement) are presented,
- use of capitalization for logic terms such as: IF, THEN, WHEN, OR, AND
- use of a logic term at the beginning of both the conditional phrase and the subsequent action phrase.

If the licensee intends to use variations in logic statements or intends to use similar statements in a different way, justification for the variation should be provided, and guidance should be included in the Writer's Guide detailing the conditions under which the variation would be used.

Ref:

AP 1001E, Section 3.2.1.e.4 provides additional guidance on the use of conditional statements.