

Docket  
File



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

October 23, 1995

Mr. James Knubel, Vice President  
and Director, TMI  
GPU Nuclear Corporation  
P.O. Box 480  
Middletown, PA 17057-0480

SUBJECT: UPDATED FINAL SAFETY ANALYSIS REPORT (UFSAR), UPDATE 12 - THREE MILE  
ISLAND NUCLEAR STATION, UNIT 1 (TMI-1)

Dear Mr. Knubel:

In a letter dated April 21, 1994, GPU Nuclear (GPUN) provided Update 12 of the TMI-1 UFSAR. The transmittal letter discussed GPUN's intention to discontinue the practice of providing updated reproductions of controlled drawings, (piping and instrumentation diagrams (P&IDs), electrical single line diagrams, plant arrangements, etc.) as part of the periodic UFSAR update submittals for TMI-1. Instead, the UFSAR referenced in the text GPUN drawings that are listed in the plant Configuration Control List and, as such, are controlled by the GPUN Operational Quality Assurance Plan. The letter also indicated that this change is estimated to reduce the administrative cost for the duration of the current license by \$224,000 without a decrease in safety.

The scope of the information required to be included in the FSAR submitted as part of an application for an operating license is specified in 10 CFR 50.34(b). Specifically, 10 CFR 50.34(b)(2) requires that the FSAR contain a description of the structures, systems and components of the facility in sufficient detail to permit understanding of the system designs and their relationship to safety evaluations. The P&IDs formerly included in the UFSAR contribute substantially to the NRC's understanding of the systems, their interfaces, and their relationship to safety evaluations. Therefore, the staff's position is that the information contained in the P&IDs formerly provided in the UFSAR cannot be removed without providing a suitable substitute.

The staff understands the substantial regulatory administrative burden associated with providing these revised P&IDs. The burden is due to the fact that the P&IDs provided in the UFSAR are created solely for the UFSAR and contain, in a different format, information available on the controlled P&IDs used by the plant staff (referred to by GPUN as the TMI-1 Print Book).

The staff has reviewed GPUN's decision as stated in the referenced letter and believes that it is contrary to the requirements of 10 CFR 50.71(e) and 10 CFR 50.34(b). However, the staff recognizes that creating separate P&IDs solely for inclusion in the UFSAR is an unnecessary regulatory burden. Therefore, the staff can agree with GPUN's decision to substitute other plant drawings for those formerly included in the UFSAR as long as the substitutions are acceptable and are formally submitted to the NRC on the docket. For example, plant-controlled drawings (the print book) can be substituted for UFSAR

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J. Knubel

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figures as long as the controlled drawings are incorporated in the FSAR by reference, are updated on the same frequency as the UFSAR update and placed on the docket in a similar fashion as the FSAR amendment, and the staff agrees that the controlled drawings were acceptable replacements.

Should you have any additional questions on the staff's position, please do not hesitate to contact me at (301) 415-2010.

Sincerely,

Original signed by:

Ronald W. Hernan, Senior Project Manager  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-289

cc: See next page

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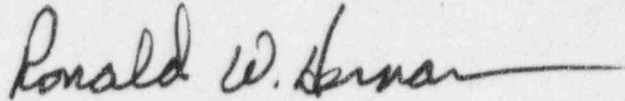
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Sincerely,



Ronald W. Hernan, Senior Project Manager  
Project Directorate I-3  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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cc: See next page

J. Knubel  
GPU Nuclear Corporation

Three Mile Island Nuclear Station,  
Unit No. 1

cc:

Michael Ross  
Director, O&M, TMI  
GPU Nuclear Corporation  
P.O. Box 480  
Middletown, PA 17057

Robert B. Borsum  
B&W Nuclear Technologies  
Suite 525  
1700 Rockville Pike  
Rockville, MD 20852

John C. Fornicola  
Director, Planning and  
Regulatory Affairs  
GPU Nuclear Corporation  
100 Interpace Parkway  
Parsippany, NJ 07054

William Dornsife, Acting Director  
Bureau of Radiation Protection  
Pennsylvania Department of  
Environmental Resources  
P.O. Box 2063  
Harrisburg, PA 17120

Jack S. Wetmore  
Manager, TMI Regulatory Affairs  
GPU Nuclear Corporation  
P.O. Box 480  
Middletown, PA 17057

Dr. Judith Johnsrud  
National Energy Committee  
Sierra Club  
433 Orlando Avenue  
State College, PA 16803

Ernest L. Blake, Jr., Esquire  
Shaw, Pittman, Potts & Trowbridge  
2300 N Street, NW.  
Washington, DC 20037

Chairman  
Board of County Commissioners  
of Dauphin County  
Dauphin County Courthouse  
Harrisburg, PA 17120

Chairman  
Board of Supervisors  
of Londonderry Township  
R.D. #1, Geyers Church Road  
Middletown, PA 17057

Michele G. Evans  
Senior Resident Inspector (TMI-1)  
U.S. Nuclear Regulatory Commission  
P.O. Box 311  
Middletown, PA 17057

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406