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

Dear Sir:

Subject: Three Mile Island Nuclear Station Unit 1, (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
GPUN Response to Initial SALP Report 90-99

On January 25, 1992, the NRC Initial Systematic Assessment of Licensee Performance (SALP) Report for Three Mile Island, Unit 1 was issued. A meeting to discuss this report was held at the Three Mile Island Training Center on February 13, 1992. The attachment to this letter provides GPU Nuclear (GPUN) comment on the SALP Report.

We appreciate the opportunity to review the SALP Report with you and provide our comments. We continue to believe that this dialogue is a meaningful facet of the SALP process.

GPUN is pleased that the NRC recognizes the overall high standards of performance maintained at TMI-1 in the various SALP areas. We are fully committed to operating TMI in a safe and efficient manner and to seeking further improvement in overall performance. As discussed during our meeting and in the attachment to this letter, your comments in the SALP report will be addressed in our effort.

We look forward to a mid-SALP review meeting with you to discuss our progress.

Sincerely,

P. R. Clark
President

DVH/mkk

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

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ATTACHMENT

GPUN RESPONSE TO SALP REPORT 90-99Overall

GPUN believes the Initial SALP Report is comprehensive and the discussion and comments fairly represent the events and performance in each area. GPUN will continue to concentrate on maintaining the high level of performance and improving overall performance standards with particular emphasis directed to "infrequently performed" evolutions. The initial SALP Report contained specific recommendations for the Maintenance/Surveillance area. The following addresses this area.

MAINTENANCE/SURVEILLANCE

The Initial SALP Report concludes that the maintenance activities and the overall surveillance program have been effective. The weakness in this area relates to the infrequently performed activities mainly in the surveillance area. GPUN agrees with these conclusions and is taking action to address this concern. As noted in GPUN responses to recent violations, surveillance procedures which are infrequently performed and which could result in potentially significant adverse consequences will be identified and reviewed as a special task. This task has begun and 30-50 procedures have been identified as falling within this category. Each selected procedure will be reviewed by a team with particular emphasis directed to issues such as vendor information, special requirements, unusual conditions while performing the procedure and human factors. GPUN believes that the use of a team review will enhance the quality of procedures. In addition to the procedure reviews, training of personnel will also be addressed. Training will not only focus on personnel performance related to the specifically cited surveillance activities but will also address the responsibilities of supervisors and workers to properly prepare for the performance of other infrequent and high risk activities. Another segment of the training will implement a Self Check program at TMI, based on the INPO Good Practice on Self Checking. TMI intends to implement this Self Check program during 1992.

The Recommendation in the SALP letter states

"Greater licensee attention is required to ensure procedures are implemented as written, proper procedures are used to perform the desired activity, and that procedures are changed when instructions are insufficient in detail. Evaluate the identified concerns associated with the maintenance/surveillance program and brief the NRC on your plans and results to date."

The enhancements outlined above have or will be initiated during 1992 and will be fully implemented by September 1993, which is prior to the scheduled start of the 10R refueling outage. As stated during the SALP meeting on February 13, 1992, GPUN will provide a status of these programs during the Mid SALP Meeting to be held in the Fall 1992 timeframe, during the Pre-Outage briefing for the 10R Outage to be conducted in the Summer 1993 and, if appropriate, we will provide an additional update near the end of the current SALP period.

FACTUAL ERROR AND CLARIFICATION

In the initial SALP Report, there is one clarification and one factual error that GPUN has identified. The clarification is on page 20, third paragraph. The fifth line should read "... hearings, reports directly to the Chairman of the Board and has a number of onsite staff members." The onsite personnel are staff members and are not members of the NSCC itself.

The factual error is found on page 23 in the Significant Enforcement Actions section. The Third line should read "... in which the procedure called for lifting of one fuel bundle out of ~~and back into~~ the core." The words "and back into" are not part of the procedure and should be deleted.

ADDITIONAL COMMENTS

The SALP Report identifies "declining" performance in Operations and a "measurable decline" in Maintenance/Surveillance. We believe that reaching a conclusion in that regard is very difficult and ultimately subjective. It is complicated by the fact that during each SALP period different activities are conducted at the plant and different inspectors are observing different things. During this SALP period the performance weaknesses occurred during the refueling outage which was at the end of the period. We believe that meaningful performance trends may require comparison of similar activities from previous SALP periods, especially as operating cycle lengths increase. Our own assessment of trends in Operations and Maintenance/Surveillance over the past 3 operating cycles has concluded that the level of performance did not decline during either operating or outage periods. However, compared to the operating periods, our outage performance has not met the same high level of performance. In any event, we are focusing on improving in areas where results don't meet expectations.