

Docket
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

March 30, 1992

Docket No. 50-282

Mr. T. Gary Broughton, Vice President
and Director - TMI-1
GPU Nuclear Corporation
Post Office Box 480
Middletown, Pennsylvania 17057

Dear Mr. Broughton:

SUBJECT: FINAL SAFETY ANALYSIS REPORT UPDATE: FACT-FINDING VISIT -
THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 1

In November 1991, the Commission directed the staff to determine how licensees are responding to the requirement in 10 CFR 50.71 for annual updates to the Final Safety Analysis Report (FSAR) and to determine whether and how the annual updates to the FSAR fall short of describing the licensees' current licensing basis (CLB). The staff is utilizing the definition of CLB from 10 CFR 54.3. Although set out in 10 CFR Part 54, that definition represents the staff's understanding of the scope of the CLB and should be applicable to all reactor licensees.

The staff will accomplish the Commission's directive by conducting fact-finding visits to a number of licensees that represent a good cross section of the industry. Our selection of plants includes those licensed from 1970 through 1987, all reactor vendor types, plants from all regions, and plants with known computerized systems for tracking commitments and those without such systems. Three Mile Island Unit 1 has been chosen as one of the plants to be visited. We will visit each site and discuss your plant-specific programs for updating the FSAR by following the resolution of selected issues through the update process. We would also like to take advantage of our visit to your facility to observe whatever systems you employ to track commitments, search data for CLB type information, or record your FSAR for easy update, search, and/or retrieval.

We have chosen a number of issues which came about as the result of new regulations or staff interpretations of regulations so that the licensing basis for plants was expanded or further defined. Some or all of the issues also required facility modifications or new systems which may be described in the FSAR. For our fact-finding visit, we are not interested in the technical adequacy of the issue. Our objective is to understand your methodology and processes for updating the FSAR so that we will be able to advise the Commission on industry practices.

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For the Three Mile Island Unit 1 facility, we have chosen the following issues for discussion:

- 1) Regulatory Guide 1.97
- 2) Generic Letter 83-28 (Salem-ATWS), Item 4.3
- 3) Generic Letter 89-06 (SPDS), and
- 4) NUREG-0737, Item II.F.2.4 (RCITS or ICCS)

We will bring the initiating documents such as Generic Letters with us, and it is requested that you have available for discussion your updated responses to the identified concerns, our acceptance letters and inspection reports that formed the CLB for the issues, and any other docketed correspondence such as your response to an enforcement action or licensee event report that, through new commitments, modified the CLB for that issue. We can then follow the process from initiation through implementation and finally the latest FSAR update. In addition, it is requested that you identify one issue from your last FSAR update that included new licensing basis and/or plant modifications and be able to show how your latest update was accomplished. This should reveal how or if your update process has evolved over time.

The staff has committed to respond to the Commission with a report in the June 1992 time period. With your help, we believe we can meet this schedule with an accurate representation of the industry practice on FSAR updates and their relation to the CLB. We would like to meet with your staff who are responsible for your FSAR updates on April 16, 1992. Please let me know if this schedule is acceptable. We believe a half day should be appropriate to obtain the information we need on FSAR update; the remaining time can be spent on discussions and demonstration of your systems to track or retrieve the CLB type information.

The Commission in its November 1991 direction to the staff also established a pilot program for voluntary participation by licensees to compile their CLB. On March 19, 1992, NRC issued Generic Letter 92-03 on this subject, and we will be glad to answer questions on the Generic Letter. Our visit should not be construed as soliciting participation in the pilot program.

The objective of our request is to determine the facts about FSAR updates and to obtain information on your current licensing basis tracking and documentation systems. There is no request for information and no new information is to be developed for our discussions. The information that we have requested be made available for the discussion should be readily

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accessible from your files. Therefore, no OMB clearance is deemed warranted. If you have questions about this or any other matter on our request, please let us know. I am available to answer questions or you may address generic questions to Dave Wigginton at (301) 504-1301.

Sincerely,

/s/

Ronald W. Hernan, Sr. Project Manager
Project Directorate I-4
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cc: See next page

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Unit No. 1

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