

January 25, 1996

Mr. James Knubel  
Vice President and Director, TMI  
GPU Nuclear Corporation  
Three Mile Island Nuclear Station  
P. O. Box 480  
Middletown, PA 17057-0191

SUBJECT: PROTECTIVE ACTION RECOMMENDATION LOGIC DIAGRAM AND METHODOLOGY

Dear Mr. Knubel:

This letter refers to your July 6, 1995 letter concerning the bases for the Three Mile Island protective action recommendation (PAR) logic diagram and methodology. Your letter was in response to our June 2, 1995, letter that transmitted the report of our inspection of the Three Mile Island exercise on April 12, 1995.

We recognize the extensive effort applied to the development of that diagram and methodology with the intent of minimizing radiation exposure to the public and appreciated your detailed response to our concerns. However, after reviewing your bases, we believe that your PAR logic diagram and methodology are inconsistent with federal regulatory guidance. Specifically, your PAR methodology places an over-reliance on radiation release duration, which is difficult to predict, and on evacuation-time estimates. This could result in a sheltering PAR when Protective Action Guidelines are exceeded, rather than trigger an evacuation PAR, which would be consistent with current federal guidance. Additionally, your logic diagram appears to contain steps that are not appropriate or that are out of sequence. For example, one block in the diagram asks the question "Can a PAR be made within approximately 15 minutes?" Federal regulations require that a PAR be issued within 15 minutes of a general emergency, and that is not an option.

Because it is unclear whether your PAR logic diagram and methodology meet current federal guidance, we have arranged to meet with GPU Nuclear Corporation staff on March 15, 1996, in the NRC Region I Office, King of Prussia, PA, to discuss the issue in more detail. This meeting was arranged in a telephone conversation with Mr. M. Slobodien on January 23. It is important that we have a clear understanding of your PAR methodology and philosophy and that you clearly understand the latest federal regulatory guidance in this area. We intend the meeting to also include this subject as it applies to the PAR methodology in use at the Oyster Creek facility. We look forward to meeting with you and resolving our concerns.

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Mr. James Knubel

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Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Richard R. Keimig, Chief  
Emergency Preparedness and  
Safeguards Branch  
Division of Reactor Safety

Docket No. 50-289

cc:

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