

GPU Nuclear

GPU Nuclear Corporation
Post Office Box 480
Route 441 South
Middletown, Pennsylvania 17057-0191
717 944-7621
TELEX 84-2386
Writer's Direct Dial Number
(717) 948-8005

May 28, 1992
C311-92-2073

U.S. Nuclear Regulatory Commission
Attn: 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
Physical Examinations for Users of Respiratory Protective
Equipment 10 CFR 20.103(c)(2)

The purpose of this letter is to document GPU Nuclear's intent to apply an interpretation relative to the periodic requirement for the subject physicals. This position was recently released by the NRC in a compilation of Health Physics Position Papers; we understand this document is soon to be issued as a NUREG. GPU Nuclear was made aware of the availability of the Health Physics Position Papers in a letter from the NRC dated February 27, 1992.

10 CFR 20.103(c)(2) specifies a 12 month time interval for physical examinations to assure that an individual is physically able to use respiratory protective equipment in an environment containing airborne radioactive material. GPU Nuclear is aware that the NRC has previously interpreted this regulation which states "at least every 12 months" to mean "every 9 to 15 months; provided that the total time over any three consecutive physical examination periods does not exceed 39 months." This NRC position was stated in a letter to Pennsylvania Power and Light Company's Susquehanna Steam Electric Station, dated May 30, 1989. The NRC stated that an exemption was not needed to implement this interpretation, but offered to process a request if submitted by the licensee.

It is our understanding, based on discussion with TMI-1 NRC Project Manager, R. W. Hernan, that the NRC no longer intends to process exemption requests relative to this issue. Therefore, we are advising the NRC of our intent to apply the NRC interpretation which allows flexibility in scheduling respirator physicals. The 12 ± 3 month periodicity for respirator physicals will allow GPU Nuclear the administrative flexibility to schedule these examinations so that no individual need be administered two physicals during the same calendar

GPU Nuclear Corporation is a subsidiary of General Public Utilities Corporation

9206010169 920528
PDR ADOCK 05000289
PDR

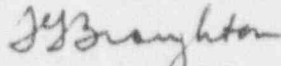
U1000

A001

Document Control Desk
C311-92-2073
Page 2

year and allow us to coordinate the scheduling of respirator physicals with the licensed operator physical examinations required by 10 CFR 55.21.

Sincerely,



T. G. Broughton
Vice President and Director, TMI-1

MRK

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