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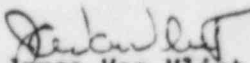
Docket No. 50-289

MEMORANDUM FOR: E. Conner, Chief, Reactor Projects Section  
No. 3B, PB No. 3, Region I

FROM: James Van Vliet, Project Manager  
Operating Reactors Branch #4, DL

SUBJECT: NRR SALP INPUT FOR TMI-1

Enclosed is NRR's SALP input for TMI-1 for the period 10/1/82 through 1/31/84. This input has been prepared in accordance with NRC Manual Chapter 0516 criteria.

  
James Van Vliet, Project Manager  
Operating Reactors Branch #4, DL

Enclosure:  
As Stated

cc:  
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Facility Name: Three Mile Island, Unit No. 1  
Licensee: GPU Nuclear Corporation  
NRR Project Manager: James A. Van Vliet

I. Introduction

This report presents the results of an evaluation of the licensee, GPU Nuclear Corporation in the functional area of licensing activities. It is intended to provide NRR's input to the SALP review process as described in NRC Manual Chapter 0516. The review covers the period 10/1/82 to 1/31/84.

The basic approach used for this evaluation was to first select a number of licensing issues which involved a significant amount of staff manpower. Comments were then solicited from the staff. In most cases the staff applied the evaluation criteria for the performance attributes based on their experience with the licensee or its products. Finally, this information was assembled in a matrix which allowed an overall evaluation of the licensee's performance. This evaluation is based on staff input from branches in three NRR divisions.

II. Summary of Results

NRC Manual Chapter 0516 specifies that each functional area evaluated will be assigned a performance category based on a composite of a number of attributes. The single final rating is then tempered with judgement as to the significance of the individual elements.

Based on this approach, the performance of GPU Nuclear Corporation in the functional area - Licensing Activities - is rated category 2.

III. Criteria

Evaluation criteria, as given in NRC Manual Chapter Appendix 0516 Table 1, were used for this evaluation.

IV. Performance Analysis

The licensee's performance evaluation is based on a consideration of seven attributes as given in the NRC Manual Chapter. For most of the licensing actions considered in this evaluation, only three or four of the attributes were of significance. Therefore, the composite rating is heavily based on the following attributes:

- Management involvement
- Approach to resolution of technical issues
- Responsiveness

Of the remaining attributes of:

- Enforcement History
- Reportable Events
- Staffing
- Training

only staffing was judged to apply to the licensing activities evaluated.

The evaluation was based on our evaluation of the following licensing activities:

- Response to NUREG-0737 Items
- Fire Protection Program (Appendix R Requirements)
- Steam Generator Recovery Program
- Pre-Restart License Amendments
- Seismic Qualification of Auxiliary Feedwater
- Licensed Operator Requalification Program Changes
- Inadequate Core Cooling Instrumentation
- Plans for Preventing Exceeding PTS Screening Criterion
- Long Term Review of Containment Purge & Vent
- Effluent Discharge Monitor Relocation
- Raising HPI & LPI Bypass Setpoints
- Station Distribution Voltage Verification Test
- Post-Accident Shielding Alternate
- Environmental Qualification

A. Management Involvement in Assuring Quality

Overall rating for this attribute is category 2. All rated activities were considered category 2, except for the steam generator recovery program and the effluent discharge monitor relocation which were rated category 1 and the environmental qualification program which was rated category 3. In general, the level of management involvement has been appropriate for the significance of the issue. Prior planning, prioritization of activities and corporate management involvement in site activities are evident. In the case of the steam generator recovery program, an issue of high company priority, safety significance, and public visibility, involvement by the highest levels of GPU management has been readily apparent. The effluent discharge monitor relocation licensing activities seemed to have been well founded and properly presented, thus implying close management involvement.

There is, however, little indication of management involvement in the TMI-1 environmental qualification issue. This conclusion was reached based on review of a number of environmental qualification

submittals, and one meeting on this subject with GPU Nuclear personnel. Subsequent to the evaluation period, another meeting and a two-day audit of the environmental qualification files were conducted; and the results confirm our conclusion in this report. There is little evidence of programmatic planning for the TMI-1 environmental qualification program. The Corporate Policy on environmental qualification became effective on January 20, 1984 and it is not clear what the previous policy may have been. There is no indication of any management or quality assurance review of the environmental qualification files. Although the files generally seem to contain the information needed to demonstrate qualification, there is no GPU analysis, other than miscellaneous hand-written notes, describing how the information relates to TMI-1 and why it demonstrates qualification. There is no indication that environmental qualification decision making is being done at the appropriate management level. More management attention is needed.

B. Approach to Resolution of Technical Issues from a Safety Standpoint

Overall rating for this attribute is category 2. Six issues were rated category 1 and eight issues were rated category 2. There were no category 3 ratings.

The licensee's understanding of the issues has been generally apparent and the proposed resolutions have been generally conservative and sound. In particular the licensee's approach to resolution of fire protection (Appendix R requirements) demonstrates a clear understanding of the technical issues; leading to technically sound, thorough approaches for resolution of the issues. The licensee's steam generator recovery program has continued to be thorough, well planned, conservative and technically sound. For both of these issues, the licensee has frequently posed questions and requested clarifications from the staff on technical or licensing aspects of the issues. This has tended to assure continued clarity of the issues to be resolved and minimized false starts, rework, etc. For environmental qualification, the category 2 rating is marginal, but improvement is anticipated as a result of increased management involvement (see above).

C. Responsiveness to NRC Initiatives

Overall rating for this attribute is category 2, with all activities rated category 2. A noted trend is that the licensee is most responsive to those issues that licensee considers having higher priority (those issues impacting restart). Issues to which licensee assigns lesser priorities periodically require submittal schedule extension. Although it is not an activity listed in the evaluation matrix, the Control of Heavy Loads is one issue for which significant submittal extensions have been necessary. Licensee responses to NRC initiatives are generally sound and thorough; and acceptable resolutions are generally proposed.

D. Enforcement History

Not applicable.

E. Reporting and Analysis of Reportable Events

Not applicable.

F. Staffing (Including Management)

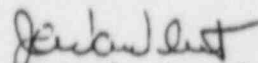
Staffing was only evaluated for two activities, thus there is insufficient basis for a meaningful overall rating of this attribute. Staffing was rated category 1 for the steam generator recovery program. Consistent with the scope and priority of the steam generator recovery program, the licensee has dedicated ample staffing (including management) of appropriate qualifications. Staffing was rated category 3 for environmental qualification. Two engineers are currently assigned to TMI-1 environmental qualification. This level of staffing is significantly smaller than the levels seen at other utilities. It therefore appears that additional staffing would be appropriate, (see above).

G. Training

Training was not evaluated for any of the activities evaluated. Thus there is no basis for evaluation.

V. Conclusions

Based on an NRR evaluation of 14 licensing activities during the period October 1, 1982 through January 31, 1984, the overall performance rating for GPU Nuclear licensing activities for Three Mile Island Nuclear Station, Unit 1 is category 2. The overall rating for each evaluated attribute is category 2. No major deficiencies affecting licensing activities became apparent during the evaluation period. GPU Nuclear should focus on improving its environmental qualification program. The licensee generally devotes an adequate level of management involvement to licensing activities; the licensee's approach to the resolution of technical issues is generally sound and conservative; and, the licensee is generally responsive to NRC initiatives.

  
James A. Van Vliet, Project Manager  
Operating Reactors Branch #4  
Division of Licensing

THI-1 EVALUATION MATRIX

Review Branch Involved	Licensing Action	Management Involvement	Approach to Resolution of Technical Issues	Responsiveness to NRC Initiatives	Enforcement History	Reportable Events	Staffing	Training
URAB	Response to NUREG-0737 Items	2	2	2	N/A	N/A	No basis	N/A
ASB CEB	Fire Protection Program (Appendix R requirements)	2	1	2	N/A	N/A	No basis	N/A
EEB URAB	Steam Generator Recovery Program	1	1	2	N/A	N/A	1	N/A
N/A	Pre-Restart License Amendments	2	2	2	N/A	N/A	No basis	N/A
URAB	Seismic Qualification of Auxiliary Feed-water	2	2	2	N/A	N/A	No basis	N/A
LQB	Licensed Operator Requalification Program Changes	2	2	2	N/A	N/A	No basis	N/A
CPB	Inadequate Core Cooling Instrumentation	2	1	2	N/A	N/A	No basis	N/A

IHI-1 EVALUATION MATRIX (Continued)

Review Branch Involved	Licensing Action	Management Involvement	Approach to Resolution of Technical Issues	Responsiveness to IIRC Initiatives	Enforcement History	Reportable Events	Staffing	Training
ORB#4	Pressurized Thermal Shock	2	2	2	N/A	N/A	No basis	N/A
CSB	Vent & Purge	Not evaluated	2	2	N/A	N/A	No basis	N/A
HETB	Effluent Discharge Monitor Relocation	1	1	1	N/A	N/A	No basis	N/A
RSB	Raising HPI & LPI Bypass Setpoints	Not evaluated	1	1	N/A	N/A	No basis	N/A
PSB	Station Distribution Voltage Verification Test	Not evaluated	1	2	N/A	N/A	No basis	N/A
RSB	Post Accident Shielding Alternate	Not evaluated	2	2	N/A	N/A	No basis	N/A
EQB	Environmental Qualification	3	2	2	N/A	N/A	3	N/A
	OVERALL	2	2	2	N/A	N/A	No basis	N/A