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August 15, 1988  
C311-88-2092

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

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Safety and Performance Improvement Program (SPIP)  
Implementation Schedule Submittals

The purpose of this letter is to clarify GPUN's intent regarding the submittal of TMI-1 implementation schedules for the Safety and Performance Improvement Program (SPIP) recommendations. In order to avoid any confusion that may result from a B&W Owners Group (BWO) letter (Reference 2), this letter documents our understanding that the official status and schedule on TMI-1 SPIP recommendations will be tracked as agreed to by the NRC and documented in the NRC staff's Safety Evaluation Report (SER) (Reference 3).

In addition to GPUN submittals, the BWO will also be transmitting plans and schedules for implementation of SPIP recommendations for TMI-1 as well as for all of the B&W plants. The BWO Recommendation Tracking System (RTS) Report is the vehicle to be used for this purpose. Since the plant specific information contained in the RTS is provided by each utility, the RTS will also provide an overall representation of TMI-1's implementation schedule and status on the SPIP recommendations.

BWO submittal of utility plans and schedules is discussed in Reference 2. The letter also states that each utility will be providing a letter authorizing the BWO to submit information on its behalf. We believe that the information the BWO will be submitting will be an accurate representation of the information submitted to the BWO by GPUN and generally useful to the NRC staff. However, for the official status, it is our intention that TMI-1 plans and schedules for implementation of the SPIP recommendations be handled as provided for through GPUN's Long Range Planning Program (LRPP) as described in the NRC's SER (Reference 3). The LRPP became part of TMI-1's Operating License in License Amendment No. 140, dated May 27, 1988.

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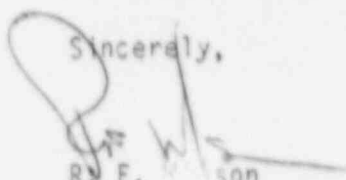
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The SER (Reference 3) states that in the case of TMI-1, GPUN's April 4, 1988 submittal provides the requested plant specific implementation schedules in a general sense and that the NRC staff intends to meet with us to discuss the details, including how the individual recommendations will be shown on our LRPP integrated schedule. The current status of GPUN SPIP recommendations is incorporated in the BWOG June update of the SPIP Recommendation Report (Reference 4). We trust that this method of tracking the TMI-1 SPIP implementation schedules will be acceptable to the NRC.

In summary, the LRPP provides the appropriate mechanism for detailed coordination with the NRC regarding the implementation of individual SPIP recommendations.

Sincerely,

  
R. F. Wilson  
Vice President and Director,  
Technical Functions

References:

1. April 4, 1988 letter, Hukill (GPUN) to Document Control Desk (NRC), GPUN Submittal of the Integrated Schedule "ABC" List.
2. May 10, 1988 letter, Rutherford (BWOG) to Crutchfield (NRC), Transmittal of March Update of SPIP Recommendation Report.
3. June 3, 1988 letter, Stolz (NRC) to Hukill (GPUN), NRC Staff's Safety Evaluation Report (NUREG-1231) on the B&W Owners Group Plant Reassessment Program.
4. July 18, 1988 letter, Rutherford (BWOG) to Crutchfield (NRC) Transmittal of June Update of SPIP Recommendation Report.

RFW/MRK/her

cc: J. Stolz  
R. Hernan  
R. Conte  
W. Russell  
D. Crutchfield