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March 7, 1986
5211-86-2043

Dr. Thomas E. Murley
Region I, Regional Administrator
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Dr. Murley:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Clarification of Notice of Violation Response for
Inspection Report 85-27

On February 27, 1986, GPUN met with R. Conte and R. Blough of NRC Region I to discuss our Notice of Violation response for IR 85-27, submitted February 10 and 19, 1986. As a result of that meeting, we offer the following as clarification of our response to parts A, C and D of the Notice of Violation:

- A. Part 1. Administrative guidance is being provided for personnel performing evolutions not covered by written procedures that is similar to what is contained in Section 6.11.1.3 of the Operational Quality Assurance Plan. This guidance will be incorporated into procedures AP 1001G, "Procedure Utilization" and AP 1029, "Conduct of Operation." This information will be disseminated to TMI-1 personnel by memo from the Director, TMI-1.
- C. We understand that it was not the NRC's intent in its statement of Violation Part C to cite GPUN against our commitments on independent verification or against NUREG-0737, Item I.C.6 requirements. Therefore, we do not view Part C of the violation as a backfit. However, GPUN has committed voluntarily to re-evaluate its commitments toward Item I.C.6 and provide NRC with a restatement of the independent verification program by April 1, 1986. We believe that the NRC will find our commitment revalidation acceptable. However, the NRC should not view this voluntary effort as relinquishing our rights under the backfit rule with respect to this issue.

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D. We believe clarification of the compliance portion of our response to Part D is needed. We feel compliance has been achieved with the completion of our corrective actions. However, we see this as an item that will require continued supervisory attention to ensure continued compliance.

Sincerely,

H. D. Huxill
H. D. Huxill
Director, TMI-1

HDH/MRK/spb

0522A

cc: R. Conte
W. Kane

Sworn and subscribed to
before me this 7th
day of March, 1986.

Sharon P. Brown
Notary Public

SHARON P. BROWN, NOTARY PUBLIC
MIDDLETOWN BORO, DAUPHIN COUNTY
MY COMMISSION EXPIRES JUNE 12, 1989
Member, Pennsylvania Association of Notaries