



GPU Nuclear, Inc.  
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December 5, 1997  
6710-97-2428

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

Gentlemen:

Subject: Three Mile Island Nuclear Generating Station (TMI-1)  
Docket No. 50-289  
Facility Operating License No. DPR-50  
Additional Information Related to 10 CFR 50.54(f) Response

References: (1) GPU Nuclear Letter 6710-97-2023, "Response to NRC Request for Information Pursuant to 10 CFR 50.54(f) Re: Adequacy and Availability of Design Basis Information," dated 2/10/97.

Since the submittal of GPU Nuclear's 10 CFR 50.54(f) response, Reference 1, several NRC Inspections have identified concerns related to design basis issues. Many of these concerns could have been avoided with more effective implementation of our corrective action processes. In response to these concerns, GPU Nuclear has taken an initiative to improve our corrective action process. Specifically, GPU Nuclear intends to implement an improved corrective action system common to both Oyster Creek and Three Mile Island Unit 1 (TMI-1). Improvements include (1) clear requirements for timeliness of deficiency reporting, response to deficiencies and escalation, (2) use of a graded approach to establish the significance of the deficiency and clear requirements for reporting and resolving deficiencies, and (3) requirements for verification of corrective action completion prior to closeout of significant conditions adverse to quality. The system is scheduled for implementation by April 1, 1998. GPU Nuclear believes that this will result in a significant improvement in maintaining our design basis information and therefore is making this initiative a new and additional commitment to those already made in our 10 CFR 50.54(f) response.

Attachment 1 provides an updated list of GPU Nuclear's 10 CFR 50.54(f) response commitments.

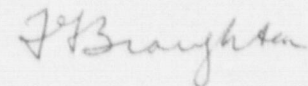
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If you have any questions or comments on this matter, please contact Kon Zak, Corporate Regulatory Affairs at (973) 316-7035.

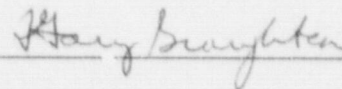
Very truly yours,



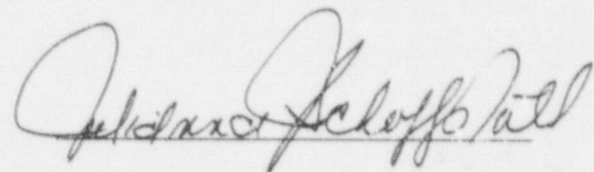
T. Gary Broughton  
President  
GPU Nuclear, Inc.



I, T. Gary Broughton being duly sworn, state that I am President and Chief Executive Officer of GPU Nuclear, Inc. and that I am duly authorized to execute and file this response on behalf of GPU Nuclear. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other GPU Nuclear employees and/or consultants. Such information has been reviewed in accordance with company practices and I believe it to be reliable.



T. Gary Broughton  
President  
GPU Nuclear, Inc.



A Notary Public of NJ

JULIENNE J. SCHOFFSTALL  
NOTARY PUBLIC OF NEW JERSEY  
My Commission Expires June 24, 2002

c: Administrator, NRC Region 1  
Senior Resident Inspector, TMI-1  
TMI-1 NRC Project Manager

**Attachment 1****Commitments and Status**

Commitment Number	Description	Status / Completion Date
1	Develop Engineering Division Procedure EP-045 to improve the review and update process in the following areas: <ul style="list-style-type: none"> <li>• Establish a periodic review of the SDBDs and FSAR to ensure consistency.</li> <li>• Provide improved process for SDBD maintenance and control.</li> <li>• Develop improved guidelines and process for biennial FSAR update.</li> </ul>	Complete
2	Consolidate resolution tracking of SDBD and SSFI open items by entering them into the Corrective Action Program to achieve a timely and effective resolution.	Complete
3	Complete procedure revisions for and training on an improved process for control and update of calculations and TDRs.	Complete
4	Conduct personnel training on design basis issues and the new FSAR update process (EP-045).	12/31/97
5	Develop a specific plan and schedule for improving setpoint basis documentation/references.	Complete
6 (New)	Implement an improved corrective action system common to both Oyster Creek and TMI-1 which will include: <ul style="list-style-type: none"> <li>• Clear requirements for timeliness of deficiency reporting, response to deficiencies and escalation.</li> <li>• Use of a graded approach to establish the significance of the deficiency and clear requirements for reporting and resolving deficiencies.</li> <li>• Requirements for verification of corrective action completion prior to closeout of significant conditions adverse to quality.</li> </ul>	4/1/98

SDBD = System Design Bases Document

TDR = Technical Data Report