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February 22, 1989
C311-89-2013

Mr. William T. Russell
Region I, Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Dear Mr. Russell:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Comments on Inspection Report 88-32

Enclosed are comments on Inspection Report 88-32. We are providing these comments to clarify actions or commitments identified in the inspection report.

Sincerely,

H. D. Hukill
Vice President & Director, TMI-1

HDH/DJD/lm1

Enclosure

cc: Resident Inspector
R. Hernan - NRC
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COMMENTS ON INSPECTION REPORT 88-32

1. Page 5, section 3.3.1 states in part:

"Future training lectures in this area will incorporate more examples and increased class member involvement."

Comment

Although this is recognized as potentially desirable for any area of training, we wish to clarify that a commitment to specifically incorporate more examples and increased class participation in the TMI-1 Technical and Safety Review Program (TSRP) Training was not intended. We continuously assess training program effectiveness to determine possible enhancements, if needed.

2. Page 5, section 3.3.1 states in part:

"To ensure that TMI-1 personnel fully understand the guidance provided with question No. 3 on the SD form, the TSRP coordinator committed to review and revise AP-1001A prior to its implementation so that it would better reflect the guidance associated with the corporate procedure."

Comment

The inspection report indicates that a commitment was made to revise AP-1001A. We feel this statement mischaracterizes the intent of our commitment to review suggested word changes regarding question No. 3 on the SD form. Our review of the proposed word changes determined that such a change did not provide a significant enhancement to understanding the existing procedural guidance on question No. 3 on the SD form, and it was decided not to revise the wording of question No. 3 prior to implementation. AP-1001A has been implemented as reviewed in draft form during the inspection. As permitted by corporate procedures, the specific wording of question No. 3 has been made specific to the TMI-1 Division such that it is more applicable to the category of safety evaluations performed by the TMI-1 Division. It is also important to recognize that the TMI-1 TSRP Training includes the same clarification and guidance as the corporate procedure in this area. We feel that the guidance and intent of the corporate procedure is adequately addressed by the current revision of AP-1001A. We will continue to monitor the implementation of this procedure, and our experience will guide any future revisions.