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Writer's Direct Dial Number:

May 10, 1989  
C311-89-2048

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

Dear Sir:

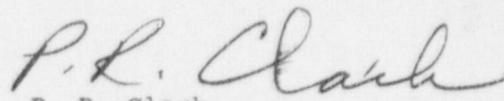
Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Response to SALP 87-99

On April 3, 1989, the NRC issued the Systematic Assessment of Licensee Performance (SALP) Report for Three Mile Island Unit 1. A meeting to discuss this report was held at the Three Mile Island Training Center on April 10, 1989. Attachment I to this letter provides the GPUN written comments on the SALP report.

We appreciate the opportunity to review with you the SALP Report and provide our comments. We continue to believe that this dialogue is the most meaningful portion of the SALP process.

It is our understanding that the NRC plans to conduct mid cycle SALP reviews to assess progress and evaluate effects of licensee performance. We would encourage this mid cycle review for TMI-1 and are willing to participate.

Sincerely,

  
P. R. Clark  
President

PRC/DVH/spb:2048

cc: W. Russell  
R. Hernan  
F. Young

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## ATTACHMENT I

### RESPONSE TO SALP REPORT 87-99

#### Overview

Several sections of the SALP Report referred to issues on procedures. GPUN has established an Administrative Procedure Task Force which has corporate wide responsibility. This task force has developed a list of recommendations which are currently being implemented. The task force will continue to monitor the implementation of these recommendations.

On the Plant level, a new Procedure Specialist has been added to the staff to help improve the procedure preparation, change and review process. This individual also will assist in the training of the procedure preparers and reviewers. This effort has been largely associated with maintenance procedures. In this area, we have increased monitoring of in field procedure compliance and quality by the QA Department, the Plant Materiel Department and the management offshift tour program. The final approval authority of plant procedures has been changed to the Department Heads in place of the O&M Director. We continue to believe the biennial review frequency is appropriate and that we have adequate resources to produce improvements on that schedule.

Overall our emphasis on procedure improvement is focused on technical, useability and human performance issues. This will strengthen the worker's ability to use the procedure on the job.

#### Plant Operations

We are pleased the NRC acknowledged our improvement in this area. We believe the good, safe operation during this SALP period is indicative of our conservative approach to safe operations, operator professionalism and knowledgeable personnel. In addition, there is an active program in place to improve crew communications.

#### Radiological Controls

We are in agreement with the analysis as presented. We have emphasized the importance of current surveys being posted. Also, significant scaffold erection in radiological areas is now an integral part of our outage planning and scheduling where appropriate.

In addition to the reasons stated in the SALP Report which contributed to higher than estimated outage personnel dose, other factors included higher working area dose rates, implementation of a more rigorous program for discrete radioactive particle control and a greater percentage of respirator work.

## Maintenance/Surveillance

### 1. Materiel Organization

During this SALP period the staffing of the Materiel Department was completed. In the planning and scheduling areas of this function we have added additional planners, placed more emphasis on the planning process and formed the outage and non-outage scheduling groups. These steps, along with the implementation of the computerized GMS-2 work management system and integrated scheduling will enable us to better plan, schedule, and document maintenance work.

### 2. Plant Materiel Condition

As acknowledged in the SALP Report, the plant and its equipment are in good materiel and operating condition. This contributed significantly to the excellent operating record. Increased emphasis has been placed on the identification and correction of minor materiel deficiencies.

### 3. Water Chemistry Control Program

GPUN has a strong water chemistry control program as discussed at the April 28, 1989 meeting with the NRC. We do not believe the SALP Report accurately characterizes this program and request that you re-review this section of the SALP. We constantly strive for improvement and therefore look forward to a clear assessment with its associated basis from which we can continue to progress.

## Emergency Preparedness and Security

We believe these are important areas and will continue our emphasis and management involvement.

## Engineering/Technical Support

We are continuing our efforts to improve in this area. The recently completed Technical Support Self Assessment has provided and will continue to provide a mechanism for improvements.

With regard to satisfying the ATWS rule requirements, we feel we are essentially agreement in every area. The implementation schedule of 9R is responsive and appropriate. This schedule has been extensively communicated to and approved by the NRC.

## Safety Assessment/Quality Verification

In our safety review process all divisions are now following the corporate procedure requirements. We believe the GPUN safety review process is a good, sound program and will improve the quality of our safety reviews. We will continue to monitor the performance in this area.