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July 2, 1984

Dr. B. J. Snyder Program Director TMI Program Office U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Dr. Snyder:

Director TMI-2's letter of May 22, provided a short-term schedule for TMI-2 Cleanup activities, and advised you that we would provide in June a schedule for the longer term.

As you know, GPU Nuclear has spent considerable effort over the past several months to gain a better understanding of the total task of cleanup of TMI-2, and of the methods and schedule for that task. From this effort we have established as our next major objective the removal and shipment offsite of nuclear fuel to the point that criticality is no longer a technically reasonable event. That objective encompasses not only the fuel in the core region, but also that which has been relocated by the accident to other portions of the reactor vessel and to plant systems. It would result in removal of the great majority of the remaining radioactivity from the site. We believe this is a significant milestone which would further reduce the remaining potential risk to the public from TMI-2. The TMI-2 Safety Advisory Board comments on that risk in its May 1984 Annual Report as follows:

"The members of SAB are unanimous in their opinion that TMI-2 does not currently pose a significant risk to public or worker health and safety."

Further, we have embarked on an accelerated plan for reaching that milestone, on a time scale which is constrained by what we consider to be reasonable and prudent care. Further reduction in the alloted time periods would, we believe, be counter-productive in personnel exposure and in the safety of the work.

We have developed a schedule for those portions of the work for which our knowledge of the actual conditions to be dealt with has been reasonably developed. We also have set target dates for other portions of the plan. These target dates are expected to be useful in focusing attention and effort on resolving the major uncertainties in the remainder of the required work. Our schedule calls for:

-Locate significant quantities of fuel no longer in the core region --December, 1984.

-Commence fuel removal -- 1 July, 1985.

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Target dates have been set as follows:

-Complete fuel removal from the original reactor volume -- third quarter 1986.

-Complete removal of all fuel in the reactor vessel -- second quarter 1987.

-Complete removal of fuel from the reactor plant systems -- third quarter 1987.

These schedules and target dates are based on the presently available incomplete information on the condition of the damaged reactor and plant, and on our expectation of reasonable success in carrying out the research and development necessary to the conduct of this unprecedented project. We have also assumed and will need continuing and timely participation by the NRC in doing its part to permit the program to go forward as planned.

As you know, there is an important question as to the appropriate definition of when the cleanup project is complete; in particular, whether for reasons of reduction in total personnel dose, work should be terminated after the fuel is removed and remaining radioactivity effectively stabilized. This would of course result in de facto long term storage of the remaining radioactivity at the site. Commission action on decommissioning criteria is expected to be helpful in reaching a sound decision on this complex matter. Fortunately, as far as project planning is concerned, the decision is not needed now. However, because of this uncertainty, we are not able now to provide a schedule for activities beyond 1987. A firm decision of the proper end point could, we expect, be made in about two years.

In view of the major uncertainties regarding the specific work to be done, we believe our efforts are best directed to making progress on the defined work and obtaining information as needed to define the currently undefined work. Efforts to develop detailed plans and schedules now for the later, undefined work are not particularly useful.

Our objective is to achieve the end point of the 1982 Project estimate in terms of cost and completion date by recovering the time lost during the last year. We currently have no information which would show this cannot be done.

In closing, let me assure you that we intend to go forward with the cleanup as rapidly as possible commensurate with the required care for the safety of the public and our personnel.

P.R.Clark President

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cc: TMIPO-TMI-2, P. Grant