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March 16, 1988 4410-88-L-0045/2416

Dr. T.E. Murley, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Dr. T.E. Murley:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
NRC Staff Support for TMI-2 Cleanup Program

Your letter of October 30, 1987 advised that "the Commission intends to continue to provide adequate NRC Staff support for the ongoing Cleanup activities and the pending adjudicatory proceedings." The purpose of this letter is to provide for your planning, the schedule for major expected submittals to NRC related to the Cleanup and to request monthly meetings of GPU Nuclear and the NRC Staff to review status and progress of resolution on all TMI-2 related matters.

First, as you know, the Atomic Safety and Licensing Board has admitted all or part of seven of the eight proposed contentions on water disposal. The discovery process is currently ongoing and will be completed by April 1988. The discovery process seems to indicate an active proceeding. GPU Nuclear now anticipates that a final decision on our proposal for the disposal of AGW by evaporation will not be forthcoming until late in the fourth quarter of 1988. This extends completion of AGW disposal well into 1990.

GPU Nuclear continues a full-scale program to complete defueling by October 1988, fuel shipment by March 1989, and to enter the proposed Post-Defueling Monitored Storage (PDMS) configuration by June 1989. Staffing plans and cost estimates are based on this schedule. In addition to the currently pending actions, there will be a number of other actions requiring NRC Staff review and approval. Examples of major known upcoming items which will require NRC Staff action are listed in Attachment I.

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Based on our experience to date, there will be other unanticipated safety analyses and license changes which also will require Staff action. In addition, experience has shown that unanticipated technical difficulties requiring prompt redirection of ongoing defueling approaches will occur. In such cases timely review and approval by the NRC Staff will be required if delays are to be avoided.

For our part, we shall continue in our attempts to anticipate a need for Staff action sufficiently early to provide ample time for review and approval. However, this may not always be possible.

Since the beginning of the defueling program, the TMI Program Office and its successor, the TMICPD, have provided timely, priority technical review and action. GPU Nuclear believes that completion of the Cleanup Program as promptly as safety allows is in the public interest. Recognizing the number and scope of activities and submittals through the next fifteen months and the need for timeliness, we propose monthly management meetings to review the program status and identify critical GPU Nuclear and NRC actions to help focus these efforts. We also suggest these meetings be held on-site.

We would welcome any suggestions by the Staff as to other means to help ensure these matters can be handled expeditiously and would be pleased to brief Washington based NRC Staff and/or provide tours of TMI-2 for familiarization. As you know we are proceeding to establish a liaison office near the NRC White Flint offices to facilitate response to Staff questions.

Sincerely,

E. E. Kintner for Executive Vice President

EEK/mak Attachment

cc: Administrator Region I - W. Russell Associate Director for Projects - F. Miraglia Director, Division of Reactor Projects - S. Varger Director, Plant Directorate IV - J. Stolz

Attachment I

TMI-2 CLEANUP PROGRAM

MAJOR ITEMS REQUIRING NRC ACTION

- A. Approval of the SER for Defueling of the Reactor Vessel Lower Head; submittal expected April 1988.
- B. Approval of the SER for Defueling of the Reactor Vessel Upper Support Assembly; submittal expected May 1988.
- C. Approval of the Specific Evaporator Process and Operating Procedures for AGW Disposal; submittal expected fourth quarter 1988.
- D. Publication of a Final Programmatic Environmental Impact Statement for PDMS; we understand that it is expected about six months after the draft publication, now expected in April.
- E. Approval of License and Technical Specification Changes and Supporting Safety Analysis for the proposed PDMS configuration; submittal expected April 1988.
- F. Approval of PDMS supporting documents (e.g. PDMS QA Plan; Emergency Plan; Organization Plan)
- G. Miscellaneous Technical Specification Change Requests not specifically related to PDMS; April 1988 to 1989.