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 Docket No. 50-320  
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December 11, 1984

Docket No. 50-320

Mr. F. R. Standerfer  
 Vice President/Director  
 Three Mile Island Unit 2  
 GPU Nuclear Corporation  
 P.O. Box 480  
 Middletown, PA 17057

Dear Mr. Standerfer:

Subject: Three Mile Island Nuclear Station, Unit 2  
 Operating License No. DPR-73  
 Docket No. 50-320  
 General Project Design Criteria

The staff has reviewed your letter dated October 30, 1984, which forwarded Revision 5 to your General Project Design Criteria (GPDC). Enclosed are several staff comments on the subject document which should be addressed prior to its implementation. You should note that the staff is approving your GPDC for general application; however, we do anticipate special cases where this criteria will have to be modified. The staff will address these situations on a case-by-case basis. Satisfactory resolution of our comments should not be interpreted as permissive to install any component or structure that does not meet the Code of Federal Regulations (CFR's). All deviations from the Code require an exemption request and safety evaluation followed by staff review and approval prior to implementation.

Sincerely,

Original signed by  
 B. J. Snyder

Bernard J. Snyder, Program Director  
 Three Mile Island Program Office  
 Office of Nuclear Reactor Regulation

Enclosure:  
 As stated

cc: See next page.

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 PDR ADOCK 05000320  
 P PDR

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SURNAME	TCPoindexter	by RAWeller	BJSnyder			
DATE	12/1/84	12/10/84	12/1/84			

Mr. F. R. Standerfer

-2-

cc: T. F. Demmitt  
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## ENCLOSURE

### Section 2.4 Safety Related

Your definition of "safety related" is not current and only allows this classification for equipment needed after/during a safe shutdown earthquake. The more recent staff definition, which can more generally be applied, is stated in 10 CFR 50.49(b)(1). The fact that this definition is contained in a section on electrical equipment is not controlling. It states as follows:

"This equipment is that relied upon to remain functional during and following design basis events to ensure (i) the integrity of the reactor coolant pressure boundary, (ii) the capability to shut down the reactor and maintain it in a safe shutdown condition, [and] (iii) the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the 10 CFR Part 100 guidelines. Design basis events are defined as conditions of normal operation [or in abnormal operating conditions for TMI-2], including anticipated operational occurrences, design basis accidents, external events, and natural phenomenon for which plant must be designed to ensure functions (i) through (iii) of this paragraph."

### Section 3.2.4

As previously stated in NRC correspondence dated August 10, 1984, November 5, 1984, and November 28, 1984, this section is invalid unless proper exemptions or exceptions to the Code of Federal Regulations have been granted.

### Section 3.4 Regulatory Requirements

This section is misleading. Recovery activities and facilities shall satisfy the requirements of all of Title 10 of the Code of Federal Regulations unless a specific exemption to certain sections has been granted. Section (1) should be updated to reflect the Appendix R exemption granted by the staff.

Note of Pg. 13

A discussion on many of these guides has been incorporated in the GPU Recovery QA Plan. Therefore, the reference to the Bechtel Nuclear Quality Assurance Plan should be deleted for those cases.

Table 4

It appears that the "Access Description" for zones V, VI and VII should state "normally inaccessible [except] during emergency."