Mr. R. F. Wilson, Director  
TMI-2  
Metropolitan Edison Company  
P. O. Box 480  
Middletown, Pennsylvania 17057  

Dear Mr. Wilson:

We have reviewed your letter of December 20, 1979 (GQL 1540) and its enclosure which proposed several modifications to the TMI-2 draft Technical Specifications. It appears that the proposed modifications would significantly decrease the level of review required for many plant procedures. The procedure review requirements of the TMI-2 draft Technical Specifications are equivalent to those in other recently issued operating licenses and are consistent with our requirements that plant procedures be reviewed by portions of the licensee's staff which are independent of the procedure writer. You have provided no basis or analysis of the proposed modifications which would justify that the proposed modifications would provide an equivalent or greater degree of assurance that the health and safety of the public would be protected. Therefore, pending further discussion of the proposed modifications to the TMI-2 draft Technical Specifications which would demonstrate a level of safety equivalent to the current Technical Specifications requirements, we find the proposed changes unacceptable.

Sincerely,

[Signature]

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TMI-2 Support

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January 15, 1980
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