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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555



Docket No. 50-320

January 15, 1980

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

A handwritten signature in cursive script, appearing to read "R. H. Vollmer".

Richard H. Vollmer, Director
TMI-2 Support

cc: See next page

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