

JUL 29 1977

Docket No. 50-289

Metropolitan Edison Company  
ATTN: Mr. J. G. Herbein  
Vice President  
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Gentlemen:

By letter dated May 24, 1977, you requested amendment of Appendix A to Facility Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit No. 1 (TMI-1). The proposed change related to the number of control rods that could be inoperable and involved revisions to Specifications 3.5.2.2.a, e and g, and 3.5.2.5.

We have completed a preliminary review of your request and conclude that the information submitted in support of the request is inadequate. Specific information needed, but not supplied, includes the following:

1. Why the proposed change would not increase the probability of occurrence of an accident or malfunction previously evaluated in the FSAR.
2. Why the change would not increase the consequences of an accident or malfunction previously evaluated in the FSAR.
3. Why the change would not create the possibility for an accident or malfunction different from any previously evaluated in the FSAR.
4. Why the margin of safety defined in the basis for any technical specification is not reduced.

The sole basis offered in your submittal for the acceptability of the proposed change is that similar allowances for control rod inoperability are provided in the Standard Technical Specifications for Babcock and Wilcox Pressurized Water Reactors. Taken by itself, similarity with a Standard Technical Specification provision, is not an adequate basis.

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for justifying any change in existing Technical Specifications for the following reasons:

- a. The Standard Technical Specifications (STS) are based on plants which meet current regulatory requirements. Therefore, to invoke a STS provision as a basis for a proposed change, it is first necessary to demonstrate that the plant design substantially conforms, in the area of interest, to current regulatory requirements. This was not done in your submittal.
- b. The selective adoption of isolated provisions of the STS that provide operational flexibility is not appropriate unless it is part of the adoption of all the STS bearing on the subject area, either directly or indirectly. This is because some provisions of the overall STS may provide the compensatory bases which justify the latitude permitted in other parts of the STS. In your submittal you proposed to adopt only an isolated provision of the STS, rather than the applicable sections of the STS.

Accordingly, in order for us to continue our review of this request, we will need a detailed safety analysis of the proposed change which fully addresses the considerations listed above. You are, of course, free to withdraw this request for amendment of your technical specifications. In order that we may plan accordingly, you are requested to advise us within 30 days of receipt of this letter, whether you intend to pursue or withdraw this request.

Sincerely,

Robert W. Reid, Chief  
Operating Reactors Branch #4  
Division of Operating Reactors

cc: See next page

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DATE >	7/29/77	7/29/77				

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