

AmerGen Energy Company, LLC
Three Mile Island Unit 1
Route 441 South, P.O. Box 480
Middletown, PA 17057

Telephone: 717-944-7621

October 25, 2000

5928-00-20305

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Dear Sir/Madam:

**SUBJECT: THREE MILE ISLAND, UNIT 1 (TMI UNIT 1)
 OPERATING LICENSE NO. DPR-50
 DOCKET NO. 50-289
 SPENT FUEL POOL STORAGE RACKS -
 BORAL PANEL SURVEILLANCE COMMITMENT**

This letter provides NRC notification of the planned installation of additional, previously licensed, Spent Fuel Pool "A" storage racks and a subsequent change to previous commitments for a direct surveillance of Boral panels in the new racks.

TMI Unit 1 is currently planning to install two (2) additional high density Spent Fuel Pool "A" storage racks in 2002. These racks were originally included in the scope of the TMI Unit 1 Spent Fuel Pool "A" reracking amendment submitted November 14, 1990, and approved by NRC in Amendment No. 164, dated April 27, 1992. The two new racks are Region 2, 9X12 racks designated F-1 and F-2 on Figure 1.1 of the TMI Unit 1 Licensing Report HI-89407 supporting Amendment No. 164.

TMI Unit 1 committed in the original license amendment application, referenced above, to perform a direct surveillance of the Boral panels in the new fuel racks which consisted of blackness testing followed by neutron radiography of suspected areas. For the two new racks being installed in 2002, and future rack installations within the original scope of TMI Unit 1 License Amendment No. 164, an alternative initial installation surveillance of the Boral panels is being implemented. The correct placement of the Boral poison panels for the TMI Unit 1 racks will be confirmed to be installed during rack fabrication in accordance with existing vendor procedures. These procedures require that each Boral panel placement be verified and documented. This confirmatory method of Boral panel installation in lieu of blackness testing provides an equivalent level of assurance of proper Boral panel installation and has been utilized within the nuclear industry and accepted by NRC for many similar wet storage license amendments since 1993 including Salem, Limerick, Oyster Creek, and Vermont Yankee.

The Boral coupon surveillance program established in Phase I of the rerack project will continue, thus bounding the necessity for future blackness testing for degradation concerns.

ADD

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If any additional information is needed, please contact David J. Distel at (610) 765-5517.

Very truly yours,



R. E. Fraile
Plant Manager

REF/djd

cc: Administrator, USNRC Region I
USNRC Senior Project Manager, TMI Unit 1
USNRC Senior Resident Inspector, TMI Unit 1
File No. 00110