

November 25, 1985

Docket No. 50-289

Mr. Henry D. Hukill, Vice President  
and Director - TMJ-1  
GPU Nuclear Corporation  
P. O. Box 480  
Middletown, Pennsylvania 17057

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Dear Mr. Hukill:

SUBJECT: EXEMPTION FROM LOCAL LEAK RATE TESTING (LLRT) SCHEDULE REQUIREMENTS

By letter dated October 22, 1985 you requested a scheduler exemption to 10 CFR 50, Appendix J, Section III.D.3 for 71 valves which must be Type C tested. This testing would require you to go to cold shutdown and you are requesting up to a six month delay because of your recent start up. Our review of your exemption is in progress and will be completed in a timely manner.

As noted in your exemption request, these tests are not only required by Appendix J but also by your Technical Specifications to be performed at intervals no greater than two years. Your Technical Specifications section 4.4.1.2.5 requires these tests to be performed at a frequency of at least each refueling period. Your Technical Specification section 1.2.8 defines a Refueling interval as "the time between normal refuelings of the reactor not to exceed 24 months without prior approval of the NRC." You then further stated that this wording in your Technical Specifications allows approval of your exemption request without a license amendment.

After reviewing your technical specifications and the exemption request, we conclude that a change to your technical specifications is necessary in addition to your exemption request. We believe that in this particular instance, the method of "prior approval of the NRC" should be by a Technical Specification change.

I understand the time constraints involved as the time interval ends February 23, 1986. We are processing the exemption request, but you will need to expeditiously apply for an appropriate Technical Specification change to compliment your exemption request.

Sincerely,

Frank Miraglia/for

Hugh L. Thompson, Jr., Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

cc: See next page

\*See previous white for concurrences:

ORB#4:DL ORB#4:DL  
JThoma;cr JStolz\*  
11/1/85 11/8/85

OELD  
JGoldberg\*  
11/12/85

AD:DR:DL  
GL:mas  
11/1/85

DEB  
HThompson  
11/1/85

8512100337 851125  
PDR ADOCK 05000289  
PDR

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Dear Mr. Hukill:

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As noted in your exemption request, these tests are not only required by Appendix J but also by your Technical Specifications to be performed at intervals no greater than two years. Your Technical Specifications section 4.4.1.2.5 requires these tests to be performed at a frequency of at least each refueling period. Your Technical Specification section 1.2.8 defines a Refueling interval as "the time between normal refuelings of the reactor not to exceed 24 months without prior approval of the NRC." You then further stated that this wording in your Technical Specifications allows approval of your exemption request without further amendment. *→ a license*

After reviewing your technical specifications and the exemption request, we conclude that a change to your technical specifications is necessary in addition to your exemption request. *→ we believe that*  
~~Because you are requesting an exemption to the regulations in this particular instance, the method by which "prior approval of the NRC" is received should be by a Technical Specification change.~~ *→ of*

I understand the time constraints involved as the time interval ends February 23, 1986. We are processing the exemption request, but you will need to expeditiously apply for an appropriate Technical Specification change to compliment your exemption request.

Sincerely,

Hugh L. Thompson, Jr., Director  
Division of Licensing  
Office of Nuclear Reactor Regulation

cc: See next page *See*

*JTH*  
ORB#4:DL  
JThoma;cr  
11/8/85

*JTH*  
ORB#4:DL  
JStolz  
11/8/85

*JG*  
OELD  
J. G. G. G.  
11/12/85

AD:OR:DL  
GLainas  
11/ /85

D:DL  
HThompson  
11/ /85

*no legal  
objection  
with model changes*

Mr. Henry D. Hukill  
GPU Nuclear Corporation

cc:

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GPU Nuclear Corporation

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Three Mile Island, Unit 1

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Atomic Safety & Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety & Licensing Appeal  
Board Panel (8)  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555