

September 25, 2000

Mr. Mark E. Warner
Vice President - TMI Unit 1
AmerGen Energy Company, LLC
P.O. Box 480
Middletown, PA 17057

SUBJECT: TMI-1 - AMENDMENT RE: TECHNICAL SPECIFICATION CHANGE REQUEST NO. 262, CHANGES TO BE MORE CONSISTENT WITH THE REVISED STANDARD TECHNICAL SPECIFICATIONS (RSTSs) (TAC NO. MA5185)

Dear Mr. Warner:

The Commission has issued the enclosed Amendment No. 225 to Facility Operating License No. DPR-50 for the Three Mile Island Nuclear Station, Unit 1 (TMI-1), in response to your application dated April 1, 1999, as supplemented by letters dated June 14, and July 27, 2000.

The amendment revises the TMI-1 TSs 1.4.2, 1.4.3, 1.4.4, 3.3.1.2.b, 3.3.1.3.b, and c, 3.3.2.1, Table 4.1-1 (Items 14, 25, 31, and 32), Table 4.1-3 (Items 4 and 6), Table 4.1-5, and TSs 4.1.5, 4.5.2.1.a and b, 4.5.2.3.a, and 4.5.3.1.b.1 and 2, to: add limiting condition for operation (LCO) action statements and make LCOs and surveillance requirements more consistent with the revised "Standard Technical Specifications for Babcock & Wilcox [B&W] Plants," NUREG-1430, Revision 1; correct conflicts or inconsistencies; and revise spent fuel pool sampling frequency from monthly and after adding chemicals, to weekly. TS 3.3.1.2.d is deleted as a result of the LCO additions described above. Also, a Bases statement for surveillance testing was added to Section 4.1 of the TSs and a revised Bases to Section 4.4.4 is included as well.

A portion of your April 1, 1999, application relating to TS 3.1.12.3, high pressure injection restrictions during low-temperature conditions, was denied by the staff by letter dated August 6, 1999. A Notice of Denial was enclosed with that letter.

Your June 14, 2000, supplement contained some errors in your analysis, which did not accurately reflect discussions between your staff and the Nuclear Regulatory Commission (NRC) staff during a March 2, 2000, telephone conference. Additionally, several pages of your proposed TSs (Enclosure 2 to your June 14 supplement) did not match existing TSs in all cases where changes were not proposed. Discussions with your staff indicated that a less up-to-date version of those TS pages may have been used for the June 14 supplement than when preparing your original application. We understand from your staff that you are implementing corrective measures to prevent a recurrence of these errors in the future.

It was also noted in your justification for changes to TSs 1.4.2, 1.4.3, and 1.4.4 that Figure 7.1-1 had previously been eliminated from the Updated Final Safety Analysis Report (UFSAR) and should no longer be referenced in these TSs. It was discussed with your staff that this sequence of changes was not strictly in conformance with Title 10 of the *Code of Federal*

M. Warner

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Regulations, Section 50.59, and that the proper method to have deleted Figure 7.1-1 from the UFSAR would have been by license amendment because of its reference in the above TSs.

A copy of the related safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Timothy G. Colburn, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosures: 1. Amendment No. 225 to DPR-50
2. Safety Evaluation

cc w/encls: See next page

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AMERGEN ENERGY COMPANY, LLC

DOCKET NO. 50-289

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 225
License No. DPR-50

1. The Nuclear Regulatory Commission (the Commission or NRC) has found that:
 - A. The application for amendment by GPU Nuclear, Inc., et al., later adopted by AmerGen Energy Company, LLC, dated, April 1, 1999, as supplemented June 14, and July 27, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.c.(2) of Facility Operating License No. DPR-50 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 225, are hereby incorporated in the license. AmerGen Energy Company, LLC, shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Marsha Gamberoni, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: September 25, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 225

FACILITY OPERATING LICENSE NO. DPR-50

DOCKET NO. 50-289

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove

1-3
3-21
3-22
4-2
4-2b
4-4
4-5
4-6
4-10

4-38
4-41
4-42
4-43

Insert

1-3
3-21
3-22
4-2
4-2b
4-4
4-5
4-6
4-10
4-10c
4-38
4-41
4-42
4-43

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 225 TO FACILITY OPERATING LICENSE NO. DPR-50

AMERGEN ENERGY COMPANY, LLC

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

DOCKET NO. 50-289

1.0 INTRODUCTION

By letter dated April 1, 1999, GPU Nuclear, Inc. (the then-licensee), submitted a request for changes to the Three Mile Island Nuclear Station, Unit 1 (TMI-1), technical specifications (TSs). AmerGen Energy Company, LLC (AmerGen, the current licensee), has since adopted this license amendment request. AmerGen supplemented this application by letters dated June 14, and July 27, 2000. The requested changes would revise the TMI-1 TSs 1.4.2, 1.4.3, 1.4.4, 3.3.1.2.b, 3.3.1.3.b, and c, 3.3.2.1, Table 4.1-1 (Items 14, 25, 31, and 32), Table 4.1-3 (Items 4 and 6), Table 4.1-5, and TSs 4.1.5, 4.5.2.1.a and b, 4.5.2.3.a, and 4.5.3.1.b.1 and 2, to: add limiting condition for operation (LCO) action statements and make LCOs and surveillance requirements more consistent with the revised "Standard Technical Specifications for Babcock & Wilcox [B&W] Plants," NUREG-1430, Revision 1; correct conflicts or inconsistencies; and revise spent fuel pool sampling frequency from monthly and after adding chemicals, to weekly. TS 3.3.1.2.d is deleted as a result of the LCO additions described above. Also, a Bases statement for surveillance testing was added to Section 4.1 of the TSs and a revised Bases to Section 4.4.4 is included as well.

2.0 EVALUATION

2.1 Changes to TSs 1.4.2, 1.4.3, and 1.4.4

The licensee stated that these TSs currently refer to a nonexistent figure, Figure 7.1-1, in the Updated Final Safety Analysis Report (UFSAR). The licensee had previously removed this figure from the UFSAR and instead created a controlled drawing from that figure which is referenced in Section 7.1 of the UFSAR. The licensee proposes to remove the obsolete reference to Figure 7.1-1 and reference Section 7.1 of the UFSAR instead, which provides a more complete description of the reactor protection system than previously provided in Figure 7.1-1, including reference to the controlled drawing which replaced Figure 7.1-1.

The staff has counseled the licensee that the proper method of effecting the change to remove Figure 7.1-1 from the UFSAR would have been by license amendment because of its reference in these TSs. However, given that the change has been made to remove Figure 7.1-1 from the UFSAR, the staff considers the licensee's requested changes to TSs 1.4.2, 1.4.3, and 1.4.4, to be administrative in nature and acceptable.

2.2 Changes to TS 3.1.12.3

This change was deleted from the licensee's June 14, and July 27, 2000, supplements as it was denied by letter dated August 6, 1999.

2.3 Changes to TSs 3.3.1.2.b and 3.3.1.3.b&c, Deletion of TS 3.3.1.2.d, and Addition of TS 3.3.2.1 and Table 4.1-5

TSs 3.3.1.2.b and 3.3.1.3.b&c currently do not have associated LCO action statements. The licensee proposed action statements containing allowed outage times and shutdown requirements generally consistent with the requirements of the revised "Standard Technical Specifications [RSTS] for Babcock & Wilcox [B&W] Plants," NUREG-1430, Revision 1. The proposed changes to TSs 3.3.1.2.b and 3.3.1.3.b&c include reference to a new TS 3.3.2.1 which provides a 72-hour allowed outage time for core flood tank (CFT) boron concentration, NaOH (sodium hydroxide) tank level and concentration, and NaOH tank discharge lines manual valve position requirements. If the requirements are not restored within the allowed outage time, the reactor will be placed in hot shutdown within 6 hours. The RSTS have an additional requirement to reduce reactor pressure (CFT boron concentration not met) or proceed to cold shutdown (NaOH system inoperability) if the condition requiring shutdown has not been corrected within an additional period of time. However, the licensee's proposed shutdown requirement to hot shutdown is consistent with its existing shutdown requirements under TS 3.3.2 and, although it is not equivalent to the RSTS requirements, offers a greater level of protection than in the current TS requirements, which do not contain allowed outage times and corresponding action statements. Therefore, the staff finds these differences to be acceptable. The staff has reviewed these proposed TSs and has determined that, except where noted, they are consistent with the guidance in NUREG-1430, Revision 1. Therefore, the staff finds them acceptable.

Additionally, the licensee proposed to delete TS 3.3.1.2.d which required one CFT pressure instrumentation channel and one level instrumentation channel per tank to be operable. The licensee proposes instead to add new surveillance requirements under proposed Table 4.1-5. The existing TS 3.3.1.2.d has no associated action statement with the TSs. NUREG-1430, Revision 1, has no requirements for operability of the CFT instrumentation. However, NUREG-1430, Revision 1, RSTS, Section 3.5, requires that the CFT level and pressure be verified within limits once-per-12-hours (once-per-shift). Proposed Table 4.1-5 includes surveillance requirements to verify CFT pressure and level each shift. The CFT instrumentation does not provide an active function, only monitoring. There is no need for a separate LCO for the instrumentation as long as the monitoring function is captured in the surveillance requirements. Additionally, proposed Table 4.1-5 includes requirements to verify that the CFT isolation valves are fully open and that power is removed from the CFT isolation valve operators. These are similar to the RSTS surveillance requirements for CFT isolation valves. The staff has reviewed these proposed changes and has determined that they are consistent with the guidance in NUREG-1430, Revision 1. Therefore, the staff finds them acceptable.

2.4 Changes to TS Table 4.1-1, Item 14

The licensee proposes to change the wording of TS Table 4.1-1, Item 14, to correct a previous typographical error, which had been carried through and uncorrected. The present wording of

this surveillance item is "High Reactor Building Logic Channels." The licensee proposes to change the wording to "High Pressure Injection Logic Channels" which is the correct wording for this surveillance item. During a previous change to this Table, the wording was inadvertently changed from its original wording to its current wording through reproduction errors and went unnoticed. This was not an intended change and has been carried forward during subsequent changes to this Table. Surveillance items 14, 16, 18, and 20 of Table 4.1-1 correspond to the beginning of the four major surveillance sections for the engineered safeguards actuation systems. The wording of Item 14 would, therefore, reasonably be expected to conform with the wording of Item 15, which is "High Pressure Injection Analog Channels." The proposed wording does conform with that of Item 15 and the staff considers this change to be acceptable.

2.5 Changes to Table 4.1-1, Items 31 and 32 and Table 4.1-3, Item 6

The licensee had previously requested and been granted (Amendment No. 196 dated September 19, 1995) approval to remove the Makeup, Purification, and Chemical Addition Systems from Section 3.2 of the TSs. The pertinent design information was relocated to the UFSAR. The licensee states that it did not request to remove the corresponding surveillance requirements from Tables 4.1-1 and 4.1-3 as part of its August 11, 1995, application due to an oversight. The licensee proposes to remove the instrument surveillance requirements for the boric acid mix tank (Item 31 of Table 4.1-1) and reclaimed boric acid storage tank (Item 32 of Table 4.1-1) and the boron concentration surveillance requirements (Item 6 of Table 4.1-3). The proposed change is consistent with the content of the RSTS in NUREG-1430, Revision 1.

The licensee has further stated that these proposed changes meet the intent of the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," issued in July 1992 and codified in Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.36 (10 CFR 50.36), because (1) these instruments are not used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) these instruments are not a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) these instruments are not a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; and (4) these instruments have not been shown by the probabilistic assessment studies to be significant to public health and safety. As such, these instruments would not require LCOs; and, therefore, there is no need for surveillance requirements to see that the LCOs would be met.

These surveillance requirements are also contained in procedures that are referenced in the administrative controls, Section 6.8 of the TSs. The Section 6.8 TS procedures are also described in Chapter 12.3 of the UFSAR. The system design requirements and bases are located in Chapters 9.1 and 9.2 of the UFSAR. Changes to the design requirements and bases or the surveillance requirements would be controlled in accordance with the requirements of 10 CFR 50.59. Based on the above, the staff has determined that the relocation of these requirements from the Technical Specification to plant procedures is acceptable.

2.6 Changes to Table 4.1-3, Item 4

The licensee proposes to change the requirements of TS Table 4.1-1, Item 4, for sampling frequency of the spent fuel pool (SFP) boron concentration, from after each make-up and

monthly, to weekly. This frequency is identical to the frequency of RSTS 3.7.15.1 in NUREG-1430, Revision 1. The licensee has further stated that the criteria that govern the storage rack locations of fuel assemblies in the SFP were developed without taking credit for boron concentration. The licensee has stated that its analyses show that a concentration of 600 ppmb (parts-per-million boron) will meet the Nuclear Regulatory Commission (NRC) maximum allowable reactivity value under the postulated fuel-handling accident condition and, if not moving fuel, no minimum boron concentration would be required. Nonetheless, the licensee is not proposing to reduce the boron concentration in the SFP, only change the sampling frequency. The SFP is normally maintained about 2,700 ppmb in order to match the refueling boron concentration requirement of TS 3.8.4 in the reactor coolant system and fuel transfer canal during refueling operations. The licensee has stated that the low- and high-level alarm setpoints on the SFP level represent about a 2-foot level difference or about 32,000 gallons. The minimum level at the low-level point is about 403,000 gallons. The licensee administratively maintains the SFP boron concentration between 2,650 and 5,000 ppmb. Assuming level just above the low-level alarm setpoint, if 32,000 gallons of water were added to the SFP, the concentration would only drop to 2,455 ppmb, which is well above the TS value of 600 ppmb. The SFP concentration could lower to 650 ppmb, and the addition of 32,000 gallons of water would only drop the concentration to 602 ppmb, still above the TS limit. On this basis, the licensee has concluded that routine make-ups of SFP water in the pool would not likely reduce the concentration to an extent that would exceed the minimum boron requirements. Thus, the requirement to sample after each make-up would not be necessary. The amount of water usually added to the SFP each week is that required to compensate for surface evaporation and is small compared to the 32,000-gallon figure used in the licensee's analysis.

Based on the low likelihood that deletion of the requirement to sample SFP boron concentration after each make-up would result in a dilution below the TS limit, and that the proposed change in sampling frequency (from monthly to weekly) is otherwise conservative and consistent with NUREG-1430, Revision 1, the staff finds the proposed changes to be acceptable.

2.7 Changes to TS 4.5.2.1

TS 4.5.2.1.a requires that a high pressure injection (HPI) system performance test be performed each refueling interval and following maintenance or modification that affects system flow characteristics. The current TS requires that the test be performed by an operator manually starting the pumps and a test signal injected to open the valves. The licensee proposes to delete the requirements for how the test is conducted, and delete the acceptance criteria of observation of the valve and pump control board operating lights and instead rely on demonstration of system flow.

The licensee states that other quarterly TS-required surveillances ensure that the HPI valve actuation logic is tested (Table 4.1-1, Item 14) and that the valves themselves are physically tested (TSs 4.2.2 and 4.5.2.4.a). The licensee states that during the engineered safeguards actuation system (ESAS) logic testing, two-of-three logic is proven by alternately sending signals to injection pumps and valves. Part of the test starts the pumps, and another part of the test stokes the injection valves, although no actual water flow takes place during these quarterly tests.

The licensee states that requiring the use of a test signal to open the valves during the performance of the refueling interval test adds complexity to the test without adding value. The

operators must carefully manipulate the ES test features and verify that only the desired components are actuated, at a time when their attention must also consider low-temperature overprotection issues and verification of proper high pressure injection component and system performance. The licensee states that removing the test signal requirement would allow the valves to be opened as part of the test setup and risks associated with inadvertent ESAS actuation would be minimized. The licensee provided a figure to illustrate that the refueling interval test is an overlapping test with the quarterly logic test because the open pushbutton is in parallel in the circuit with the ES contact and otherwise the same contacts are tested in each test. The only change would be the method of starting the pump. The HPI system configuration when HPI flow is measured during the refueling interval test would be unchanged. The scope of the ESAS logic and HPI system tests would also not be changed. The licensee states that the proposed TMI-1 TSs would include requirements similar to the RSTS of NUREG-1430, Revision 1, except where the TMI-1 TSs exceed the RSTS requirements.

Post-modification or maintenance testing would still be conducted in a manner to ensure that the system or components were operable following the modification or maintenance in accordance with established procedures. The requirements for post-modification and maintenance-required surveillances are details not required in the RSTS of NUREG-1430, Revision 1.

The staff has reviewed the licensee's proposed TS changes and determined that there is sufficient overlap of the quarterly ESAS logic tests and the refueling interval HPI system test to ensure that the required components are tested. The staff also agrees that system flow is a more appropriate measure for determining pump and valve performance than observation of the control board indicating lights. Based on the above, the staff finds the licensee's proposed changes to be acceptable.

2.8 Changes to TS 4.5.2.3

TS 4.5.2.3 requires that a core flood system test be performed each refueling interval. The test verifies that the check valves between the CFTs and the reactor vessel open as designed. The licensee proposes to delete the current requirement that the test be performed "while depressurizing the reactor coolant system" in order that the test could also be performed during cold shutdown or during plant heatup. This would allow the system test to be performed at the same time the inservice test (IST) requirements of TS 4.2.2 for full flow testing of the check valves is performed. TS 4.2.2 is performed while the reactor coolant system (RCS) is depressurized. A single test can then be performed to fulfill both test requirements.

The licensee has stated that the core flood valves can be tested for open verification with the RCS depressurized without impacting the quality of the test result. TS 4.5.2.3 requires that the operation of the check valves and isolation valves be verified by decreasing CFT level on the control board indication. This verification that water will flow from the CFTs to the reactor vessel can be achieved during the IST required by TS 4.2.2. The proposed change that the system test be performed without specifying plant conditions during the test allows the two tests to be performed concurrently.

The staff has reviewed the licensee's proposed change. The RSTS of NUREG-1430, Revision 1, do not specify plant conditions for the system test for the emergency core cooling system. Nor do the RSTS requirements prohibit the performance of the system test in

conjunction with the IST surveillances. Based on the above, the staff finds the licensee's proposed changes to be acceptable.

2.9 Changes to TS 4.5.3.1

TS 4.5.3.1 requires that a reactor building emergency cooling system (RBECS) performance test be completed each refueling interval. The specification also includes unnecessary additional complexity similar to that for the changes to TS 4.5.2.1 discussed above. Specifically, the TS requires that a "test signal" actuate the RBECS valves to demonstrate operability of the coolers. Additionally, the test is considered satisfactory if the valves have completed their expected travel. The licensee proposes to delete the requirement for the manner in which the test is conducted, and change the acceptance criteria from valve travel to measured system flow being greater than the accident design flow rate.

Similar to the changes discussed in paragraph 2.7 above, the licensee has stated that the additional requirement to actuate these valves by test signal during the test adds a greater level of complexity to the test without additional benefit. The licensee stated that the quarterly ES logic testing proves two-out-of-three logic by alternately sending signals to injection pumps and valves. Although the quarterly logic testing does not flow water in the HPI, low pressure injection, and RBEC systems, part of the test starts the pumps, followed by another part of the test that strokes the injection valves. Additional component tests are conducted quarterly in accordance with TS 4.5.3.2.a. Valve travel is stopped by an open limit switch in the valve operator and is independent of the open signal. The OPEN pushbutton contact is in parallel with the quarterly ES contact. The refueling interval test of the valve provides a degree of overlap with the quarterly logic test because in both cases the limit switch in the valve operator stops travel. The licensee has stated that the contact arrangement for the RBECS test is similar to that described for the HPI test evaluated in paragraph 2.7 above.

The licensee states that the scope of testing of the ESAS and the RBECS is not affected by this proposed change. The proposed change only eliminates unnecessary overlap between requirements. The frequency of testing the valve actuation logic and valve operation is also unchanged. The licensee further states that the change in test method does not degrade the scope or quality of the system performance evaluation. The licensee also states that the use of flow rather than valve travel provides a better evaluation of system performance.

The licensee points out that the RSTS of NUREG-1430, Revision 1, include two related requirements with respect to RBECS testing: (1) to verify RBECS flow capacity exceeds design every 31 days and (2) to verify the auto-actuation of the RBECS every 18 months. The licensee's equivalent surveillance requirements test the auto-actuation logic and physical actuation of components on a quarterly frequency and the system flow on a refueling interval. However, the licensee is not proposing changes to the frequency of conducting the surveillances, only requesting removal of a level of detail for conducting the surveillance that is not contained in the RSTS. Additionally, the proposed changes to the acceptance criteria from completion of valve travel to verification of system flow exceeding design flow are more consistent with the RSTS than the current TSs.

The staff has reviewed the licensee's proposed changes and determined that there is sufficient overlap of the quarterly ESAS logic tests and the refueling interval RBECS test to ensure that the required components are tested. The staff also agrees that system flow is a more

appropriate measure for determining valve performance than valve travel. Based on the above, the staff finds the licensee's proposed changes to be acceptable.

2.10 Changes to TS 4.1.2, Table 4.1-1, Item 25, and addition of new Table 4.1-5

The proposed TS 4.1.2 refers to a new Table 4.1-5 for equipment and sampling tests of the CFTs. These new testing requirements for CFTs require verification of the CFT level and pressure each shift and add CFT isolation valve surveillance requirements at the intervals specified. These new surveillance requirements are consistent with the surveillance requirements in the RSTS of NUREG-1430, Revision 1, and are necessary to support the deletion of part of Table 4.1-1, Item 25 (CFT pressure and level instrumentation channel check surveillances), and deletion of TS 3.3.1.2.d (evaluated in paragraph 2.3 above).

The staff has reviewed the licensee's proposed changes. The staff has determined that the changes are consistent with the requirements of the RSTS. The requirement to perform a once-per-shift surveillance to verify the CFT pressure and level negates the need to perform once-per-shift channel checks of the instrumentation channels. Operating experience has shown that tank volumes and pressures in this type of design are not likely to change over a short period of time. The verification of CFT pressure and level each shift will provide an adequate means to detect and correct detrimental volume and pressure changes within the CFTs and is consistent with the RSTS requirements. This once-per-shift verification will reveal any instrumentation problems since there are redundant instrument channels on each of the CFTs. The proposed deletion of instrument operability and surveillance requirements currently contained in the TSs is consistent with the RSTS. As stated in paragraph 2.3 above, there is no need for a separate LCO for the instrumentation as long as the monitoring function is captured in the surveillance requirements. The proposed changes are consistent with the guidance in NUREG-1430, Revision 1 and, based on the above, the staff finds the proposed changes acceptable.

A related Bases change is included in Section 4.1 of the TSs. Additionally, an unrelated Bases change to TS 4.4.4, which was provided by another licensee letter dated July 27, 2000, was included for convenience. Bases changes are not typically reviewed and approved by the NRC. The licensee makes changes to the Bases in accordance with 10 CFR 50.59.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (64 FR 40906) and (65 FR 51349). Accordingly, the

amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: T. Colburn

Date: September 25, 2000

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