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An Exelon/British Energy Company

10 CFR 50.90

March 1, 2001
5928-01-20066

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Dear Sir/Madam:

SUBJECT: THREE MILE ISLAND, UNIT 1 (TMI Unit 1)
OPERATING LICENSE NO. DPR-50
DOCKET NO. 50-289
CLARIFICATION OF EXIGENT TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 309, NUCLEAR SERVICES RIVER WATER (NR) SYSTEM

To avoid any confusion regarding the AmerGen submittal of Exigent TSCR No. 309 as reflected in TMI Unit 1 License Amendment No. 229, AmerGen wishes to make the following clarification. Four of the six items in Section IV, "Compensating Measures," of our February 14, 2001 submittal listed under the heading "Actions Required Prior to Cross Connecting SR and NR and Repairing Pipe," were intended to be pre-requisites to cross-connecting the two systems. However, two of these commitments were intended to be pre-requisites to repairing the pipe, after cross-connecting. The first item under this heading stated: "The valves used to isolate the leaking pipe (NR-V-3 and NR-V-5) will be verified acceptably leak tight prior to starting the repair." As outlined in the previous paragraph labeled "System Configuration" in the February 14, 2001 submittal, cross-connecting the NR and SR systems is accomplished by opening three valves (NR-V-6, NR-V-2, and NR-V-7). The leaking line will then be isolated by closing NR-V-3 and NR-V-5. These valves will then be verified acceptably leak tight prior to starting the repair. The second item under this heading stated: "After the systems are cross connected and the leaking pipe isolated, the breakers will be opened on valves NR-V-2, 7, 6, 5, and 3 to prevent inadvertent repositioning." Electrical power must be applied to the valve operators for the valves to change positions remotely from the Control Room. Only after cross-connecting the two systems will power be removed by opening the power supply breakers.

Also, AmerGen has been requested by the NRC to define the term "acceptably leak tight" from our February 14, 2001 letter as discussed in the previous paragraph above. Acceptable leak tightness ensures that when the portion of underground pipe is opened for repairs, the leakage

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past NR-V-3 and NR-V-5 will not result in a loss of NR or SR cooling capability. Leakage past these valves would not significantly affect cooling capability unless the leakage were extremely high. The temporary procedure for the repair requires that, when the pipe is first isolated and vented, the pressure within the isolated portion of the NR System must be below 15 psig at NR-V-35 within the heat exchanger vault, approximately 20 ft below the elevation of the underground piping section. This limit will result in a pressure less than 10 psig at the elevation of the pipe to be repaired to minimize flexing of the pipe when it is uncovered. The procedure also requires continuous monitoring to ensure that NR and SR supply header pressure is maintained above 21 psig as measured at NR-PI-217 and SR-PI-134 and indicated in the Control Room. In addition to nuclear safety considerations, the procedure includes inspections of the work location each shift to assure leakage is acceptable from an industrial safety standpoint (i.e., the leakage at the work site does not endanger workers or prohibit work). If leakage at the work location were not acceptable for performing work, then the isolation valves would be manually tightened to reduce leakage or additional pumping capability would be added. If neither of these actions could make working on the pipe possible, then the job would be stopped.

Please contact Bob Knight at (717) 948-8554 if you have any questions regarding this submittal.

Sincerely yours,

George Gellrich for Mark Warner

Mark E. Warner
Vice President, TMI Unit 1

MEW/mrk

Enclosure

cc: USNRC Regional Administrator, Region I
USNRC TMI Senior Resident Inspector
USNRC TMI Unit 1 Senior Project Manager
Chairman, Board of Supervisors of Londonderry Township
Chairman, Board of County Commissioners of Dauphin County
Director, Bureau of Radiation Protection, PA Department of Environmental Resources
File No. 01025

AMERGEN ENERGY COMPANY, LLC

Three Mile Island, Unit 1
Operating License No. DPR-50
Docket No. 50-289
Clarification of Exigent Technical Specification Change Request (TSCR) No. 309,
Nuclear River Water System

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF DAUPHIN)

This clarification is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-50 for Three Mile Island, Unit 1. All statements contained in this submittal have been reviewed, and all such statements made and matters set forth therein are true and correct to the best of my knowledge.

AmerGen Energy Company, LLC

BY: _____ for Mark Warner
Vice President, TMI Unit 1

Sworn and subscribed to before me this 1st day of March, 2001.

SEAL:

_____
Notary Public

Notarial Seal
Suzanne C. Miklosik, Notary Public
Londonderry Twp., Dauphin County
My Commission Expires Nov. 22, 2003
Member, Pennsylvania Association of Notaries