

June 27, 2001
5928-01-20170

10 CFR 50.90

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

**SUBJECT: THREE MILE ISLAND, UNIT 1 (TMI UNIT 1)
OPERATING LICENSE NO. DPR-50
DOCKET NO. 50-289
ADDITIONAL INFORMATION – LICENSE AMENDMENT
REQUEST NO. 308 – PRESSURE TEMPERATURE OPERATING
CURVES**

Dear Sir or Madam:

As requested by NRC staff, this letter provides a revised no significant hazards considerations (NSHC) evaluation (reference Attachment 1) using the standards in 10 CFR 50.92, as applicable to TMI Unit 1 License Amendment Request No. 308. TMI Unit 1 License Amendment Request No. 308 was previously submitted to NRC in AmerGen letter 5928-01-20035, dated March 29, 2001. The original NSHC evaluation provided in the above referenced letter was essentially identical to the NSHC evaluation published in the Federal Register for the Oconee Nuclear Station Units 1,2 and 3 amendment request for revised pressure-temperature limits on June 16, 1999 (Federal Register Notice 64 FR 32289).

A complete NSHC evaluation is provided in Attachment 1; however, this revision only affects the evaluation pertaining to 10 CFR 50.92 (c)(2). The revised NSHC evaluation provided in Attachment 1 replaces the NSHC evaluation contained in TMI Unit 1 License Amendment Request No. 308 (AmerGen letter 5928-01-20035, dated March 29, 2001). The original conclusion that the TMI Unit 1 License Amendment Request No. 308 poses no significant hazards considerations remains unchanged.

A001

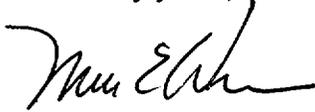
5928-01-20170

June 27, 2001

Page 2

There are no new regulatory commitments established by this submittal. If any additional information is needed, please contact David J. Distel at (610) 765-5517.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Mark E. Warner". The signature is fluid and cursive, with a large initial "M" and "W".

Mark E. Warner
Vice President, TMI Unit 1

MEW/djd

Attachment: Revised No Significant Hazards Consideration Evaluation -
License Amendment Request No. 308

cc: H. J. Miller, USNRC, Regional Administrator, Region I
T. G. Colburn, USNRC, Senior Project Manager, TMI Unit 1
J. D. Orr, USNRC, Senior Resident Inspector, TMI Unit 1
File No. 01021

ATTACHMENT 1

Revised No Significant Hazards Considerations Evaluation -

License Amendment Request No. 308

TMI UNIT 1 LICENSE AMENDMENT REQUEST NO. 308 –

PRESSURE TEMPERATURE OPERATING CURVES

No Significant Hazards Considerations

AmerGen has determined that this License Amendment Request poses no significant hazards considerations as defined by 10 CFR 50.92.

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated.

These proposed Technical Specification changes were developed utilizing the procedures of ASME XI, Appendix G, in conjunction with Code Cases N-588 and N-640. Usage of these procedures provides compliance with the underlying intent of 10 CFR 50 Appendix G and provides safety limits and margins of safety which ensure that failure of a reactor vessel will not occur.

The proposed changes do not impact the capability of the reactor coolant pressure boundary (i.e., no change in operating pressure, materials, seismic loading, etc.) and therefore, do not increase the potential for the occurrence of a loss of coolant accident (LOCA). The changes do not modify the reactor coolant system pressure boundary, nor make any physical changes to the facility design, material, or construction standards.

The probability of any design basis accident (DBA) is not affected by this change, nor are the consequences of any DBA affected by this change. The proposed Pressure-Temperature (P-T) limits, Low Temperature Overpressure (LTOP) limits and setpoints, and allowable operating reactor coolant pump combinations are not considered to be an initiator or contributor to any accident analysis addressed in the TMI Unit 1 UFSAR.

The proposed changes do not adversely affect the integrity of the RCS such that its function in the control of radiological consequences is affected. Radiological off-site exposures from normal operation and operational transients, and faults of moderate frequency do not exceed the guidelines of 10 CFR 100. In addition, the proposed changes do not affect any fission product barrier. The revised PORV LTOP setpoint is established to protect reactor coolant pressure boundary. The changes do not degrade or prevent the response of the PORV or safety-related systems to previously evaluated accidents. In addition, the changes do not alter any assumption previously made in the mitigation of the radiological consequences of an accident previously evaluated.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed license amendment revises the TMI Unit 1 reactor vessel P-T limits, LTOP limits and setpoints, and allowable operating reactor coolant pump combinations. Compliance with 10 CFR 50 Appendix G, includes utilization of ASME XI, Appendix G, as modified by Code Cases N-588 and N-640 to meet the underlying intent of the regulations. The criteria of 10 CFR 50.61 remains satisfied, thus, ensuring an adequate margin of safety for potential thermal shock events. The proposed limits are developed utilizing NRC-approved methodology and conservatively account for material property changes as required by regulation. The design basis event related to the change is nonductile failure of the reactor coolant pressure boundary. The proposed amendment provides assurance of protection against nonductile failure of the reactor coolant pressure boundary for operation of 29 Effective Full Power Years (EFPY) and is unrelated to the possibility of creating a new or different kind of accident. The proposed amendment does not introduce any new systems or components, or create any new component failure modes. Sufficient pressure margin is maintained to accommodate the proposed change to the allowable operating reactor coolant pump combinations.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

The proposed Technical Specification (TS) changes were developed utilizing the procedures of ASME XI, Appendix G, in conjunction with Code Cases N-588 and N-640. Usage of these procedures provides compliance with the underlying intent of 10 CFR 50 Appendix G and provides safety limits and margins of safety which ensure that failure of a reactor vessel will not occur.

No plant safety limits, set points, or design parameters are adversely affected. The fuel, fuel cladding, and Reactor Coolant System are not impacted.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.