

May 23, 2002

Mr. John L. Skolds, President
and Chief Nuclear Officer
Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 (TMI-1), REQUEST FOR
ADDITIONAL INFORMATION RE: EMERGENCY FEEDWATER (EFW)
TECHNICAL SPECIFICATION (TS) CHANGE REQUEST (TAC NO. MB3660)

Dear Mr. Skolds:

The Nuclear Regulatory Commission (NRC) staff has determined that it will need the enclosed additional information in order to complete its review of your December 19, 2001, application for changes to the TMI-1 EFW TSs. As discussed with your staff during a telephone call on May 16, 2002, we request that you provide the requested information within 30 days receipt of this letter.

If you have any questions, please contact me at 301-415-1402.

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

Enclosure: Request for Additional Information

cc w/encl: See next page

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ACCESSION NO.: ML021420021 *RAI input dated 05/01/02. No substantive changes made.

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NAME	TColburn	SLittle for MO'Brien	DTrimble*	RLaufer
DATE	05/22/02	05/22/02	05/01/02	05/23/02

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REQUEST FOR ADDITIONAL INFORMATION
THREE MILE ISLAND NUCLEAR STATION, UNIT 1 (TMI-1)
EMERGENCY FEEDWATER (EFW) SYSTEM
TECHNICAL SPECIFICATION (TS) CHANGE REQUEST
DOCKET NO. 50-289

1. What is the minimum amount of time allowable for an individual to realign the valves to their operational positions in the event an EFW transient were to occur while performing this surveillance test? Also, please clarify: Using Figure 1 from the licensee's December 19, 2001, submittal as a basis, identify which valves require manual actions and the relative distances between them. Also, identify the transit time between valves and, how much time and effort are required for an individual to manually realign each valve?
2. What is the basis for determining that an individual can successfully and reliably accomplish the required actions in the minimum allowable time under conditions that simulate the real event? For example, during an EFW transient event, are there harsh environmental factors such as radiation, excessive heat, noise, etc., that would hamper an individual from performing the required manual valve realignment and, if there are impediments, have they been considered in determining whether an individual can perform the required actions?
3. What are the consequences if the individual fails to perform the actions (i.e., valve realignment) in the allotted time?
4. The licensee (page 4 of 6 of Attachment 1 of the December 19, 2001, submittal) defines the individual performing the EFW surveillance as follows:

A dedicated qualified individual is defined in the revised Bases to be one who is involved exclusively with the EFW surveillance testing....."

However, the individual is not solely responsible for valve realignment but also has as his principal responsibility, EFW testing. The licensee, in its response, has changed the meaning of the term "dedicated" from its previous usage (see Attachment 3 of the licensee's December 19, 2001 submittal, the licensee's December 6, 2000, submittal, discussion on page 14 of 20). The individual, as described by the licensee in its December 19, 2001, submittal, is "designated," not "dedicated" because he has additional responsibilities relative to the function of valve realignment. Either term and set of responsibilities is appropriate, i.e., either the individual is "dedicated" exclusively to the valve manipulation, the action for which the licensee is seeking credit or, the individual is "designated" (i.e., can perform other tasks in addition to the principal task (which is valve realignment) such as EFW testing).

Enclosure

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cc:

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