

January 19, 2005

Mr. Christopher M. Crane  
President and Chief Executive Officer  
AmerGen Energy Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) - MISSED  
SURVEILLANCE CRITERIA BASED ON TECHNICAL SPECIFICATION TASK  
FORCE (TSTF)-358, REVISION 6, AND INCLUSION OF A BASES CONTROL  
PROGRAM FOR THREE MILE ISLAND NUCLEAR STATION, UNIT 1 (TMI-1)  
(TAC NO. MC3653)

Dear Mr. Crane:

By letter dated June 24, 2004, you submitted a license amendment application to the TMI-1 TSs to revise the required actions and time restraints regarding missed surveillances as stated in TMI-1 TS 4.0.2. Your application also proposed adding a new Section 6.18 to the TSs to provide a Bases Control Program. As discussed with your staff during a January 6, 2005, conference call, the enclosed information relates to the adoption of TSTF-358, Revision 6, by licensees for plants with non-standard (custom) TSs such as TMI-1. We request that you either follow option 1 or option 2 with respect to your proposed amendment request. Your staff indicated during the conference call that option 2 would most likely be your planned course of action. As discussed with your staff, please provide this information within 30 days of 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: RAI

cc w/encl: See next page

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Dear Mr. Crane:

By letter dated June 24, 2004, you submitted a license amendment application to the TMI-1 TSs to revise the required actions and time restraints regarding missed surveillances as stated in TMI-1 TS 4.0.2. Your application also proposed adding a new Section 6.18 to the TSs to provide a Bases Control Program. As discussed with your staff during a January 6, 2005, conference call, the enclosed information relates to the adoption of TSTF-358, Revision 6, by licensees for plants with non-standard (custom) TSs such as TMI-1. We request that you either follow option 1 or option 2 with respect to your proposed amendment request. Your staff indicated during the conference call that option 2 would most likely be your planned course of action. As discussed with your staff, please provide this information within 30 days of receipt of this letter.

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REQUEST FOR ADDITIONAL INFORMATION

THREE MILE ISLAND NUCLEAR STATION, UNIT 1 (TMI-1)

ADOPTION OF TECHNICAL SPECIFICATION TASK FORCE (TSTF)-358, REVISION 6, AND

INCLUSION OF A BASES CONTROL PROGRAM

The Nuclear Regulatory Commission (NRC) staff has reviewed the TMI-1 licensee's June 24, 2004, license amendment request and proposed technical specification (TS) changes. During a conference call on January 6, 2005, the NRC staff provided guidance to the licensee's staff for non-standard TS plants to adopt TSTF-358, Revision 6. This guidance is repeated below:

The change to the Standard Technical Specification (STS) surveillance requirement (SR) 3.0.3 that provides flexibility to entering a TS-Required Action based upon a risk evaluation, was approved in the Consolidated Line Item Improvement Process (CLIIP) change known as TSTF-358, Revision 6. CLIIP and TSTF changes are based upon the STS, and units that adopt those changes must either have the STSs or their custom TSs must be equivalent to the STSs in the area of the change.

SR 3.0.3 addresses the situation of a missed surveillance, a surveillance that was not performed within its required frequency, and the resulting implications for considering the surveillance and associated limiting condition for operation not met. To accurately adopt and implement TSTF-358, Rev 6, the custom plant must have or must establish identical requirements for what it means to meet an SR. STS SR 3.0.1 establishes those requirements. So, for a custom-TS plant to adopt TSTF-358, Rev 6, it must do either of the following options:

1. Adopt STS SR 3.0.1 and associated bases, or
2. Show that their custom TS have equivalent requirements to SR 3.0.1, and adopt the STS SR 3.0.1 Bases.

There are four sentences to STS SR 3.0.1, and each sentence is a requirement. Custom-TS plants not adopting STS SR 3.0.1 must describe how their TSs contain these four elements.

The licensee is requested to either revise its submittal to adopt option 1, or provide the information necessary to show equivalency as required in option 2. Also, the licensee must commit to revise the TMI-1 TS Bases to adopt the STS SR 3.0.1 Bases.

ENCLOSURE

Three Mile Island Nuclear Station, Unit 1

cc:

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