

July 11, 2007
5928-07-20159

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

Three Mile Island, Unit 1 (TMI Unit 1)
Facility Operating License No. DPR-50
NRC Docket No. 50-289

Subject: Response To Request For Additional Information – Technical Specification
Change Request No. 333: Relocation of Technical Specification Requirements
for Refuel and Spent Fuel Pool Area Radiation Monitors (TAC No. MD3783)

- References: (1) USNRC letter to AmerGen Energy Company, LLC dated July 3, 2007,
“Request for Additional Information Regarding the Relocation of Refuel and
Spent Fuel Pool Area Radiation Monitors Technical Specification Amendment
(TAC No. MD3783)”
- (2) AmerGen Energy Company, LLC letter to NRC dated December 12, 2006
(5928-06-20498), “Technical Specification Change Request No. 333 –
Relocation of Technical Specification Requirements for Refuel and Spent Fuel
Pool Area Radiation Monitors.”

This letter provides additional information in response to the NRC request for additional
information (RAI), issued July 3, 2007 (Reference 1), regarding TMI Unit 1 Technical
Specification Change Request No. 333, submitted to NRC for review on December 12, 2006
(Reference 2). The additional information is provided in Enclosure 1.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11th
day of July, 2007.

Respectfully,

9 6 78 

Pamela B. Gowan
Director - Licensing & Regulatory Affairs
AmerGen Energy Company, LLC

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Enclosure: 1) Response to Request for Additional Information

cc: S. J. Collins, USNRC Administrator, Region I
P. J. Bamford, USNRC Project Manager, TMI Unit 1
D. M. Kern, USNRC Senior Resident Inspector, TMI Unit 1
File No. 06041

ENCLOSURE 1

TMI UNIT 1

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
TECHNICAL SPECIFICATION CHANGE REQUEST No. 333
Relocation of Technical Specification Requirements for Refuel and Spent Fuel
Pool Area Radiation Monitors**

**RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION (RAI)
TMI UNIT 1 TECHNICAL SPECIFICATION CHANGE REQUEST No. 333
Relocation of Technical Specification Requirements for Refuel and Spent Fuel Pool Area
Radiation Monitors**

1. **NRC Question**

Describe how the proposed change will continue to meet the monitoring requirements of 10CFR20.1501 (a)(2), "reasonable under the circumstances to evaluate...the magnitude and extent of radiation levels... and the potential radiological hazards."

Response

TMI Unit 1 Radiation Monitors RM-G6, RM-G7, and RM-G9 provide refueling and spent fuel pool area radiation monitoring for personnel protection during fuel loading and refueling operations. These monitors alert personnel to an increase in radiation level and off-standard conditions and ensure appropriate actions can be taken to protect personnel from excessive radiation, as specified by the 10 CFR Part 20 total individual dose standards, in the event of an off-standard condition. These functions are not affected by the proposed Technical Specification change or by the planned physical relocation of the monitors from their current bridge locations to the respective building walls. Radiation Monitors RM-G6, RM-G7, and RM-G9 will continue to be sufficient to evaluate the magnitude and extent of radiological hazards in the area, and adequately warn personnel of off-standard conditions. The proposed change is administrative since it only removes the RM-G6, RM-G7, and RM-G9 radiation monitors from the TMI Unit 1 Technical Specifications. Any additional changes to these radiation monitors, including their physical location, will be adequately controlled by the requirements of 10 CFR 50.59.