

August 22, 2008

Mr. Michael P. Gallagher
Vice President License Renewal Projects
AmerGen Energy Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR SECTION 2.1.5.2 OF THE
THREE MILE ISLAND NUCLEAR STATION, UNIT 1, LICENSE RENEWAL
APPLICATION (TAC NO. MD7701)

Dear Mr. Gallagher:

By letter dated January 8, 2008, AmerGen Energy Company, LLC (AmerGen) submitted an application pursuant to 10 CFR Part 54 to renew the operating license for Three Mile Island Nuclear Station, Unit 1 for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review. Further requests for additional information may be issued in the future.

Items in the enclosure were discussed with Chris Wilson, of your staff, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-2878 or e-mail Jay.Robinson@nrc.gov.

Sincerely,

/RA/

Jay Robinson, Sr. Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:
As stated

cc w/encl: See next page

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ADAMS Accession No.: ML082190781

OFFICE	LA:DLR	OGC	DLR:RER2	PM:DLR:RPB1	BC:DLR:RPB1
NAME	SFigueroa	BMinuzo	RAuluck	JRobinson	DPelton
DATE	08/14/08	07/17/08	08/20/08	08/22/08	08/22/08

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Letter to AmerGen Energy Company, LLC from J. Robinson dated August 22, 2008

DISTRIBUTION:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION FOR SECTION 2.1.5.2 OF THE
THREE MILE ISLAND NUCLEAR STATION, UNIT 1, LICENSE RENEWAL
APPLICATION (TAC NO. MD7701)

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Three Mile Island Nuclear Station,
Unit 1

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Three Mile Island Nuclear Station,
Unit 1

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Three Mile Island Nuclear Station,
Unit 1

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REQUEST FOR ADDITIONAL INFORMATION (RAI)

SECTION 2.1.5.2

THREE MILE ISLAND NUCLEAR STATION, UNIT – 1

LICENSE RENEWAL APPLICATION

LRA Section 2 – Scoping and Screening Methodology and Results

10 CFR 54.4(a)(2) requires that all nonsafety-related systems, structures, and components whose failure could prevent satisfactory accomplishment of any safety-related systems, structures, and components (SSCs) are included within the scope of license renewal.

RAI#: 2.1.5.2-1

License Renewal Application (LRA) Section 2.1.5.2 states on page 2.1-19, “for a nonsafety-related piping system connected to a safety-related piping system, the nonsafety-related system was assumed to provide structural support to the safety-related system, unless otherwise confirmed by a review of the installation details. The entire nonsafety-related system was included in scope for 10 CFR 54.4(a)(2), up to one of the following:” and then lists the bounding criteria contained in NEI 95-10 “Industry Guideline on Implementing the Requirements of 10 CFR Part 54, The License Renewal Rule”, (seismic anchor, base-mounted component, flexible connection, free end of non-safety related piping, buried end of piping, and nonsafety-related piping runs connected to safety-related piping on both ends). In addition, LRA Section 2.1.5.2 also states on page 2.1-19, “these scoping boundaries are determined from the physical installation details, and confirmed in cases by review of design drawings or visual inspection by plant walk-downs where necessary.”

During the scoping and screening methodology audit, the staff reviewed the scoping results for the abandoned hydrogen purge system and was not able to determine that the applicant had applied the methods described in LRA Section 2.1.5.2 to determine the portion of the nonsafety-related piping, attached to safety-related SSCs, to be included within the scope of license renewal. The staff requests that the applicant describe the methods used and the basis for conclusions, in determining the portion of nonsafety-related abandoned system piping, attached to safety-related SSCs, to be included within the scope of license renewal.

RAI#: 2.1.5.2-2

During the scoping and screening methodology audit, the applicant stated that for certain systems, the portion of nonsafety-related piping, attached to safety-related SSCs, to be included within the scope of license renewal, had not been completely determined. The staff reviewed the scoping results for the make-up and purification system and determined that the scoping endpoints for attached piping had not been clearly defined in three instances due to a portion of the nonsafety-related piping being inaccessible to personnel while the plant was at power. The staff requests that the applicant describe the methods used and the basis for conclusions, in determining the portion of nonsafety-related inaccessible piping, attached to safety-related SSCs, to be included within the scope of license renewal.

ENCLOSURE

RAI#: 2.1.5.2-3

LRA Section 2.1.5.2 states on page 2.1-20, “the preventive option as implemented at TMI-1 is based on a “spaces” approach for scoping of nonsafety-related systems with potential spatial interaction with safety-related SSCs. Potential spatial interaction is assumed in any structure that contains active or passive safety-related SSCs. ... For structures that contain safety-related SSCs, there may be selected rooms within the structure that do not contain any safety-related SSCs. Current Licensing Basis (CLB) document reviews and plant walk-downs were utilized as appropriate to confirm that these rooms did not contain safety-related SSCs, thereby eliminating spatial interaction concerns within these rooms.”

During the scoping and screening methodology audit, the staff performed a walk-down of the turbine building. The staff determined that a portion of the turbine building contained fluid-filled, nonsafety-related systems which were not included within the scope of license renewal (referred to by the applicant as an “excluded area”). However, since the turbine building is generally an open space, the excluded area was located in the same room as safety-related containment isolation valves (CA-V-5A and CA-V-5B). The staff determined that the nonsafety-related, fluid-filled SSCs were not separated from safety-related SSCs by a room as described in LRA Section 2.1.5.2 (see above). The staff requests that the applicant describe the methods used and the basis for conclusions, in determining to not include nonsafety-related, fluid-filled SSCs within the scope of license renewal when located in the same room as safety-related SSCs.

As part of your response for RAIs 2.1.5.2-1 through 2.1.5.2-3, please address the extent of condition and additional scoping reviews performed for nonsafety-related abandoned SSCs, nonsafety-related inaccessible SSCs, and nonsafety-related SSCs located within the same room as safety-related SSCs, with the potential to affect safety-related SSCs. List any additional SSCs included within the scope of license renewal as a result of the review, and list those structures and components for which aging management reviews were conducted. For each structure and component, describe the aging management programs, as applicable, to be credited for managing the identified aging effects.