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10 CFR 50
10 CFR 51
10 CFR 54

5928-08-20224
November 3, 2008

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Three Mile Island Nuclear Station, Unit 1.
Facility Operating License No. DPR-50
NRC Docket No.50-289

Subject: Supplement to AmerGen Response to NRC Request for Additional Information related to Three Mile Island Nuclear Station, Unit 1, License Renewal Application.

Reference: AmerGen response (Letter # 5928-08-20197 dated September 19th, 2008.) to "Request for additional information for Sections 2.2, 2.3, 2.4 and 2.5 of the Three Mile Island Nuclear Station, Unit 1, License Renewal Application", (TAC No. MD7701)

In the referenced letter, AmerGen responded to NRC Requests for Additional Information (RAI) 2.4.10-1 and 2.4.12-1. During the NRC Staff review of this response, it was determined that a clarification to the responses was needed. The Enclosure to this letter provides that clarification. The RAI questions along with the original responses is repeated. New information included in the response is displayed in bolded italic font for ease of identification.

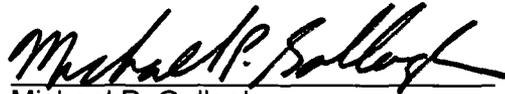
This letter and its enclosure contain no commitments.

If you have any questions, please contact Fred Polaski, Manager License Renewal, at 610-765-5935.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

Executed on 11-03-2008


Michael P. Gallagher
Vice President, License Renewal
AmerGen Energy Company, LLC

A131
NRC

Enclosure A: Clarification to RAI responses 2.4.10-1 and 2.4.12-1.

cc: Regional Administrator, USNRC Region I, w/Enclosure
USNRC Project Manager, NRR - License Renewal, Safety, w/Enclosure
USNRC Project Manager, NRR - License Renewal, Environmental, w/o Enclosure
USNRC Project Manager, NRR - TMIGS, w/o Enclosure
USNRC Senior Resident Inspector, TMIGS, w/o Enclosure

File No. 08001

Enclosure – A

Clarification to RAI responses 2.4.10-1 and 2.4.12-1.

RAI # 2.4.10-1

Section 2.4.10 of the LRA, Mechanical Draft Cooling Tower (MDCT) Structures, states that the intended function of the MDCT basin is to provide structural support and a flow path for the inlet and outlet river discharge piping. Within the current licensing basis, please justify the LRA statement that the failure of the building, adjoining TMI-2 structure, and sodium bisulfate tank foundation and dike does not affect the intended functions of the MDCT basin.

AmerGen Response

The building, adjoining TMI-2 structure, and sodium bisulfate tank foundation are nonsafety-related structures per the current licensing basis. These structures are not credited with performing any intended functions for License Renewal. Failure of these structures will not affect any intended functions for safety-related Systems, Structures and Components (SSCs) and they are not relied on to demonstrate compliance with any of the 5 regulated events identified per 10 CFR 54.4 (a)(3).

The closest safety-related SSC is piping at the entrance and exit to the MDCT basin which is more than 6 feet below grade or contained within the MDCT basin. This piping performs a pressure boundary intended function for License Renewal that would not be affected by failure of these structures. The piping is protected either by the soil or by the very robust reinforced concrete of the in-scope MDCT basin which is constructed of 2'6" thick reinforced concrete exterior walls and base slab and a 2'0" thick reinforced concrete roof. The MDCT basin roof is also supported by 2'0" thick interior reinforced concrete walls.

For an SSC to be included in scope for License Renewal per 10 CFR 54.4(a)(2) the SSC must be nonsafety-related whose failure could impact an intended function of a safety-related SSC. Since the soil above the pipe or the MDCT basin protects the associated safety-related piping, failure of the not in scope structures noted above cannot impact an intended function for a safety-related SSC. ***Also, there are no hypothetical failures for the MDCT Structures in the current licensing basis.*** Therefore, these structures were determined not to be in scope for License Renewal.

RAI # 2.4.12-1

Section 2.4.12 of the LRA, Natural Draft Cooling Towers, states that the intended function of the reinforced concrete basin is to provide structural support and a flow path for the Circulating Water Pump House. Within the current licensing basis, please justify the LRA statement that the failure of the reinforced concrete hyperbolic towers, the wooden fill structure, and the canopy at the base of the towers does not affect the intended functions of the basin.

AmerGen Response

The reinforced concrete hyperbolic towers, the wooden fill structure, and the canopy are nonsafety-related portions of the Natural Draft Cooling Towers (NDCTs) per the current licensing basis. They are not credited with performing any intended functions for License Renewal. Failure of these portions of the NDCTs could affect the intended functions for the nonsafety-related, in-scope (a)(2) basins. However, this does not require that these structures be included in scope for License Renewal per 10 CFR 54.4(a)(2).

For an SSC to be included in scope for License Renewal per 10 CFR 54.4(a)(2), the SSC must be nonsafety-related whose failure could impact an intended function for a safety-related SSC. Since none of the above structures or the in-scope basin are safety-related, a failure cannot impact a safety-related SSC intended function. ***Also, there are no hypothetical failures for the reinforced concrete hyperbolic towers, the wooden fill structure and the canopy at the base of the towers in the current licensing basis.*** Therefore, these structures were determined not to be in-scope for License Renewal.

NSRB _____

TMI REGULATORY ASSURANCE

CORRESPONDENCE DISTRIBUTION - INFORMATION SHEET

Letter No. 5928 - 08 - 20224 Letter Date: 11/3/08 Engineer/Coordinator C. Wilson

ETTS Assignee: _____ DOC's (OPEN) _____

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Supplement to AmerGen Response to NRC RAI re. TMI-1 LRA

SUBJECT FILE: _____

DISTRIBUTION DATE: 11/3/08
 Letter 5928-08-20197 dated 9/19/08
 REF: sections 2.3.3 and 2.3.4.

TMI-1 Senior Staff		TMI-1 Plant Division		TMI-1 Lic./Reg. Assur./NRB	
W Noll, TMI VP	OSF-2	R S Campbell, Superintendent	OPS	P B Cowan, Dir Licensing	KSA-3E ✓
L Hydrick, Mgr, Bus Ops	NOB-2	J C Wend, Dir R/H & Safety	OOB-1	D P Helker, Mgr TMI Lic	KSA-3E ✓
E Rapczynski, Mgr Comm	KSA-3N	C Baker - Mgr RAW & Chem	OOB-1	P L Faletti, NSRB Coord	KSA-3E
J Heischman, Dir Maint	Svc Bldg	, Mgr OPS	OOB-2	, Lic. Eng	KSA-3E
T J Dougherty, Plant Manager	OOB-2	✓ L Troiano	OOB-2	A W Miller, Reg Assur Eng	NOB-2 ✓
J C Wend, Dir Trng	Trg Ctr.	✓ S R Cogley, Environ Eng	NOB-2	D Hockley S/A Coord	NOB-2 ✓
S P Queen, Dir Site Eng	NOB-3				
H Yeldell, Dir Work Mgt	OSF-2				
C A Moody, Mgr HR	NOB-2				
D Atherholt, Mgr Reg Assur	NOB-2	✓ TMI-1 Engineering Division			
W.B Carsky, Dir Operations,	OOB-2	✓ W S Wilkerson, Mgr Eng Resp	NOB-3	D Deboer	✓
NSA		Sr Mgr, Plt Eng.	NOB-3	C Warlow	✓
L Weir, Mgr NOS	OSF-2	, Mgr NIS Process Comp	NOB-1		
		H Crawford, Mgr RX NSSS	NOB-3		
SECURITY		J Valent, Mgr, Elec/Sys Eng,	NOB-3		
D Mohre, Mgr Security	PC	, Mgr Programs	NOB-3		
		B Shumaker, Mgr Mec/BOP Sys	NOB-3		
		, Sr Mgr Design Eng	NOB-3		
EDMS	NOB-2	✓ R C Ezzo, Sr. Mgr Design	NOB-3		
Routing/Licensing	NOB-2	✓ , Mgr Mech/Struc	NOB-3		
Records Management	KSA-1N				
Commitment Coordinator (East)	KSA-3E				
TMI-1 Training Division					
J Murray, Ops Trng Mgr	Trg Ctr	✓			
TMI-1 Work Management				Others	
				ANI/Oliveira	
				M&M Hoffman	
				INPO Records	
T Geyer, Mgr, Planning	OSF-2	TMI-2		Framatome/Merdich	
H L Wilson, Supv Maint Assess	OSF-2	J J Byrne, Mgr Decomm	SOB-1	PA DEP	
		J Wood	Oak Harbor, OH	N Clarkson/Oconee Ler/NOV	
		M O'Reilly, Legal	Akron, OH	K Jury, VP Exe. Corp Cantera	
V Cwietniewicz, EP Mgr	KSA 3N	R Saunders, CNO	Akron, OH	(TMI submittal to NRC copy)	
D Neff, EP	NOB-2	EFMR Monitoring Group			
		E Epstein			

EDMS INDEX

LICENSING TABLE

LOC: (X) TMI-1 () TMI-2 () TMI-C () INTERNAL

TITLE:

DOC TYPE: 3002

TOCO: USNRC

TOPERS:

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