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10 CFR 50
10 CFR 51
10 CFR 54

TMI-09-027
January 30, 2009

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: Revision to response for RAI B.2.1.30-1

References: 1. Letter from M. Gallagher (AmerGen Energy Company, LLC) to U. S. Nuclear Regulatory Commission, "Response to NRC Request for Additional Information related to Three Mile Island Nuclear Station, Unit 1, License Renewal Application," dated October 30, 2008. (ML #083080376)

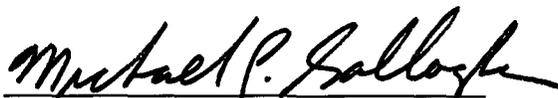
In the Reference 1 letter, AmerGen Energy Company, LLC (AmerGen) submitted a response to RAI B.2.1.30-1. During phone conferences held on 12/16/08 and 1/27/09, NRC staff and Exelon discussed further clarifications required for this RAI response.

In Attachment A, Exelon provides the original RAI question and our revised response.

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. Executed on the 30th of January, 2009.

Respectfully,



Michael P. Gallagher
Vice President, License Renewal
Exelon Generation Company, LLC

Attachment: Revised response to RAI B.2.1-30-1

ENCLOSURE

A131
NRR

Attachment: Revised response to RAI B.2.1-30-1

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

Attachment A

Revised response to RAI B.2.1.30-1

LRA Section: B.2.1.30, Electrical Cables and Connections Not Subject to 10 CFR 50.49
Environmental Qualification Requirements

Background:

On page B-106 of the LRA, the program description states that AMP B.2.1.30 is a new program and is consistent with the GALL Report AMP XI.E1. The GALL Report AMP XI.E1 states that an adverse localized environment is a condition in a limited plant area that is significantly more severe than the specified service environment for the cable.

Issue:

The LRA did not provide the criteria used to indicate how an adverse localized environment is determined.

Request:

Explain how adverse localized environment is determined based on the most limiting service environment of cables (radiation, temperature, and moisture) for inclusion within the scope of AMP B.2.1.30.

Exelon revised response to RAI B.2.1.30-1

The TMI-1 B.2.1.30 Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements aging management program (AMP) implements visual inspection of both general plant areas and adverse localized environments, in lieu of determining where each cable and connection insulation material, for in scope, non-EQ circuits is located throughout the plant. General plant area ambient temperatures range from 70 degrees F to 140 degrees F, and general plant area radiation doses range from 0 Rads to 6.57E06 Rads. The thresholds for identifying adverse localized environments have been set at 112 degrees F and 5E04 Rads corresponding to TMI-1's 60-year service-limiting cable insulation materials, polyvinyl chloride (PVC) and teflon insulations, respectively. The cable and connection insulations' 60-year service-limits are taken from the EPRI Plant Support Engineering: License Renewal Electrical Handbook, 1013475, Final Report, February 2007. These limits will be incorporated into the implementing procedure for this aging management program.