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Kennett Square, PA 19348TMI-09-064
May 29, 2009U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555Three Mile Island Nuclear Station, Unit 1
Facility Operating License No. DPR-50
NRC Docket No. 50-289**Subject:** Three Mile Island Nuclear Station, Unit 1 updated Appendix A.5 License Renewal Commitment List.

- References:**
1. Letter from M. Gallagher (EGC) to U. S. Nuclear Regulatory Commission, "Future Correspondence Concerning the License Renewal Application of Three Mile Island, Unit 1, and a Revision to the License Renewal Commitment List," dated January 26, 2009.
 2. Letter from B. Holian (U. S. Nuclear Regulatory Commission) to M. Gallagher Exelon Generation Company, "Safety Evaluation Report With Open Items related to the license renewal of Three Mile Island Nuclear Station, Unit 1," dated March 13, 2009.

In the Reference 1 letter, Exelon Generation Company (EGC) submitted an updated Appendix A.5 License Renewal Commitment List.

In the Reference 2 letter, the U. S. Nuclear Regulatory Commission (USNRC) requested EGC to review the "Safety Evaluation Report with Open Items Related to the License Renewal of Three Mile Island Nuclear Station, Unit 1." During the EGC review, it was identified that a wording change was required to Appendix A.5 License Renewal Commitment List, Table item # 28, along with minor changes to further clarify the implementation schedule. The revised Appendix A.5 License Renewal Commitment List is contained in Attachment A to this letter.

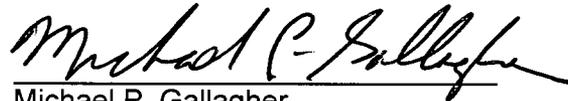
If you have any questions, please contact Al Fulvio, Manager License Renewal, at 610-765-5936.

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

Respectfully,

Executed on 05-29-2009



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

Attachment A: EGC correction to TMI-1 License Renewal Commitment List A.5.

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

File No. 08001

Attachment – A

Note: New text will be shown as ***bolded italics***.

EGC correction to TMI-1 License Renewal Commitment List A.5

A.5 License Renewal Commitment List

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
1.	ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD	Existing program is credited.	A.2.1.1	Ongoing	Section B.2.1.1
2.	Water Chemistry	Existing program is credited. The program will be enhanced to incorporate the continuous monitoring of sodium in steam generator blowdown, making it consistent with EPRI 1008224, Pressurized Water Reactor Secondary Water Chemistry Guidelines, Revision 6.	A.2.1.2	Prior to the period of extended operation.	Section B.2.1.2
3.	Reactor Head Closure Studs	Existing program is credited. The program will be enhanced to select an alternate stable lubricant that is compatible with the fastener material and the environment.	A.2.1.3	Prior to the period of extended operation.	Section B.2.1.3 Letter 5928-08-20208 dated 10/30/2008
4.	Boric Acid Corrosion	Existing program is credited.	A.2.1.4	Ongoing	Section B.2.1.4
5.	Nickel-Alloy Penetration Nozzles Welded to the Upper Reactor Vessel Closure Heads of Pressurized Water Reactors	Existing program is credited.	A.2.1.5	Ongoing	Section B.2.1.5
6.	Flow-Accelerated Corrosion	Existing program is credited.	A.2.1.6	Ongoing	Section B.2.1.6
7.	Bolting Integrity	Existing program is credited.	A.2.1.7	Ongoing	Section B.2.1.7
8.	Steam Generator Tube Integrity	Existing program is credited.	A.2.1.8	Ongoing	Section B.2.1.8

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
9.	Open-Cycle Cooling Water System	<p>Existing program is credited.</p> <p>The program will be enhanced by adding a new river water chemical treatment system to treat the river water systems for biofouling.</p>	A.2.1.9	Prior to the period of extended operation.	Section B.2.1.9
10.	Closed-Cycle Cooling Water System	<p>Existing program is credited.</p> <p>The program will be enhanced to include a one-time inspection of selected components in stagnant flow areas to confirm the absence of aging effects resulting from exposure to closed cycle cooling water. Also, a one-time inspection of selected CCCW chemical mix tanks and associated piping components will be performed to verify corrosion has not occurred on the interior surfaces of the tanks and associated piping components.</p>	A.2.1.10	<i>Program and one-time inspections to be implemented prior to the period of extended operation.</i>	Section B.2.1.10
11.	Inspection of Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems	<p>Existing program is credited.</p> <p>The program will be enhanced to include visual inspection of rails in the rail system for loss of material due to wear, and visual inspection of structural bolting for loss of material. Acceptance criteria will be enhanced to require that significant loss of material due to wear will be evaluated or corrected to ensure the intended function of the crane or hoist is not impacted.</p>	A.2.1.11	Prior to the period of extended operation.	Section B.2.1.11
12.	Compressed Air Monitoring	<p>Existing program is credited.</p> <p>The program will be enhanced to include air quality testing for dew point, particulates, lubricant content, and contaminants to ensure that the contamination standards of ANSI/ISA7.0.01-1996, paragraph 5 are met. In addition the program will be enhanced to include air quality sampling on a representative sampling of headers on a yearly basis in accordance with the guidelines of ASME OM-S/G-1998, Part 17 and EPRI TR-108147.</p>	A.2.1.12	Prior to the period of extended operation.	Section B.2.1.12

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
13.	Fire Protection	<p>Existing program is credited.</p> <p>The program will be enhanced to include additional inspection criteria for degradation of fire barrier walls, ceilings, and floors, and specific fuel supply line inspection criteria for diesel-driven fire pumps during tests.</p> <p>In addition, implementing surveillance procedures for halon and carbon dioxide suppression systems will specifically require inspection for corrosion, mechanical damage or damage to dampers, and will include acceptance criteria stating that detected signs of corrosion or mechanical damage be evaluated, with corrective action taken as appropriate.</p>	A.2.1.13	Prior to the period of extended operation.	<p>Section B.2.1.13</p> <p>Letter 5928-08-20204 dated 10/20/2008</p>
14.	Fire Water System	<p>Existing program is credited.</p> <p>The program will be enhanced to include sprinkler head testing in accordance with NFPA 25, "Inspection, Testing and Maintenance of Water-Based Fire Protection Systems." Samples will be submitted to a testing laboratory prior to being in service 50 years. This testing will be repeated at intervals not exceeding 10 years.</p> <p>Prior to the period of extended operation, the program will be enhanced to include periodic non-intrusive wall thickness measurements of selected portions of the fire water system at an interval not to exceed every 10 years. <i>The initial wall thickness inspections will be performed prior to the period of extended operation.</i></p>	A.2.1.14	<p>Prior to the period of extended operation.</p> <p><i>Inspection schedule identified in commitment.</i></p>	Section B.2.1.14

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
15.	Aboveground Steel Tanks	<p>Existing program is credited.</p> <p>The program will be enhanced to include one-time thickness measurements of the bottom of the Condensate Storage Tanks, which are supported on concrete foundations. The measurements will be taken to ensure that significant degradation is not occurring and the component intended function will be maintained during the extended period of operation. The program will also be enhanced to inspect the sealant at the tank-foundation interface.</p>	A.2.1.15	<i>Program and one-time inspections to be implemented prior to the period of extended operation.</i>	Section B.2.1.15
16.	Fuel Oil Chemistry	<p>Existing program is credited.</p> <p>The program will be enhanced to include:</p> <ul style="list-style-type: none"> • The analysis of new fuel oil for specific or API gravity, kinematic viscosity, and water and sediment prior to filling the fuel oil storage tanks followed by full spectrum analysis within 31 days after the addition of the fuel oil into the fuel oil storage tanks. • The determination of water and sediment and particulate contamination in accordance with ASTM standards. • The analysis for bacteria in new and stored fuel oil. • The addition of biocides, stabilizers, or corrosion inhibitors as determined by fuel oil analysis activities. • Activities to periodically drain water and sediment from tank bottoms, and, activities to periodically drain, clean, and inspect fuel oil tanks. • Manual sampling in accordance with ASTM standards and required frequencies: • The use of ultrasonic techniques for determining tank bottom thicknesses should there be any evidence of loss of material due to general, pitting, crevice, and microbiologically influenced corrosion, and fouling found during visual inspection activities. • <i>To confirm the absence of any significant aging</i> 	A.2.1.16	<i>Program and one-time inspections to be implemented prior to the period of extended operation.</i>	Section B.2.1.16

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
		<p><i>effects, one-time inspections will be performed on the following tanks:</i></p> <ul style="list-style-type: none"> • <i>Station Blackout Diesel Clean Fuel Tank</i> • <i>Station Blackout Diesel Day Tank</i> 			
17.	Reactor Vessel Surveillance	<p>Existing program is credited.</p> <p>The program will be enhanced to address maintenance of the TMI-1 cavity dosimetry exchange schedule. The program will also be enhanced to clarify that, if future plant operations exceed the limitations or bounds specified in Regulatory Position 1.3 of RG 1.99, Rev. 2, the impact of plant operation changes on the extent of reactor vessel embrittlement will be evaluated and the NRC will be notified.</p>	A.2.1.17	Prior to the period of extended operation.	Section B.2.1.17
18.	One-Time Inspection	<p>Program is new.</p> <p>The program will be used to provide reasonable assurance that an aging effect is not occurring, or that the aging effect is occurring slowly enough to not affect a components intended function during the period of extended operation, and therefore will not require additional aging management. The program will be credited for cases where either (a) an aging effect is not expected to occur but there is insufficient data to completely rule it out, (b) an aging effect is expected to progress very slowly in the specified environment, but the local environment may be more adverse than that generally expected, or (c) the characteristics of the aging effect include a long incubation period.</p> <p>This program will be used for the following:</p> <ul style="list-style-type: none"> • To confirm the effectiveness of the Water Chemistry program to manage the loss of material, cracking, and the reduction of heat transfer aging effects for steel, stainless steel, copper alloy, nickel alloy, and aluminum alloy in treated water, steam, and reactor coolant environments. 	A.2.1.18	<i>Program and one-time inspections to be implemented prior to the period of extended operation.</i>	Section B.2.1.18

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
		<ul style="list-style-type: none"> • To confirm the effectiveness of the Fuel Oil Chemistry program to manage the loss of material aging effect for steel, stainless steel, and copper alloy in a fuel oil environment. • To confirm the effectiveness of the Lubricating Oil Analysis program to manage the loss of material and the reduction of heat transfer aging effects for steel, stainless steel, copper alloy, and aluminum alloy in a lubricating oil environment. • To confirm the loss of material aging effect is insignificant for stainless steel and copper alloy in an air/gas – wetted environment. <p>Inspection methods will include visual examination or volumetric examinations. Acceptance criteria will be in accordance with industry guidelines, codes, and standards. The One-Time Inspection program provides for the evaluation of the need for follow-up examinations to monitor the progression of aging if age-related degradation is found that could jeopardize an intended function before the end of the period of extended operation. Should aging effects be detected, the program triggers actions to characterize the nature and extent of the aging effect and determines what subsequent monitoring is needed to ensure intended functions are maintained during the period of extended operation.</p>			
19.	Selective Leaching of Materials	<p>Program is new.</p> <p>The program will be used to manage the loss of material due to selective leaching. The program includes inspection of a representative sample of susceptible components to determine if loss of material due to selective leaching is occurring. One-time inspections will include visual examinations, supplemented by hardness tests, and other examinations, as required. If selective leaching is found, the condition will be evaluated to determine the need to expand inspection scope.</p>	A.2.1.19	<i>Program and one-time inspections to be implemented prior to the period of extended operation.</i>	Section B.2.1.19

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
20.	Buried Piping and Tanks Inspection	<p>Existing program is credited.</p> <p>The program will be enhanced to include:</p> <ul style="list-style-type: none"> • Inspection of buried stainless steel piping and components prior to entering the period of extended operation. • Inspection of buried cast iron, carbon steel, concrete-coated carbon steel, and stainless steel piping and components within ten years after entering the period of extended operation. • Internal inspection and UT of the D.G. Fuel Storage 30,000 Gallon Tank prior to the period of extended operation, and within ten years after entering the period of extended operation 	A.2.1.20	<p>Prior to the period of extended operation.</p> <p><i>Inspection schedule identified in commitment.</i></p>	Section B.2.1.20
21.	External Surfaces Monitoring	<p>Program is new.</p> <p>The program will be used to manage aging effects through visual inspection of external surfaces for evidence of hardening and loss of strength and loss of material. The program directs visual inspections that are performed during system walkdowns. The program consists of periodic visual inspection of components such as piping, piping components, ducting, and other components within the scope of license renewal. Visual inspections may be augmented by physical manipulation to detect hardening and loss of strength of elastomers.</p>	A.2.1.21	Prior to the period of extended operation.	Section B.2.1.21

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
22.	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components	<p>Program is new.</p> <p>The program will be used to manage cracking due to stress corrosion cracking; hardening and loss of strength due to elastomer degradation; loss of material due to general, pitting, crevice, and microbiologically influenced corrosion, erosion, and fouling; and reduction of heat transfer due to fouling. The program includes provisions for visual inspections of the internal surfaces and volumetric testing of components not managed under any other aging management program. Visual inspections may be augmented by physical manipulation to detect hardening and loss of strength of elastomers.</p>	A.2.1.22	Prior to the period of extended operation.	<p>Section B.2.1.22</p> <p>Letter 5928-08-20204 dated 10/20/2008</p>
23.	Lubricating Oil Analysis	Existing program is credited.	A.2.1.23	Ongoing	Section B.2.1.23
24.	ASME Section XI, Subsection IWE	Existing program is credited.	A.2.1.24	Ongoing	Section B.2.1.24
25.	ASME Section XI, Subsection IWL	Existing program is credited.	A.2.1.25	Ongoing	Section B.2.1.25
26.	ASME Section XI, Subsection IWF	Existing program is credited.	A.2.1.26	Ongoing	Section B.2.1.26
27.	10 CFR Part 50, Appendix J	Existing program is credited.	A.2.1.27	Ongoing	Section B.2.1.27
28.	Structures Monitoring Program	<p>Existing program is credited.</p> <p>The program will be enhanced to include:</p> <ul style="list-style-type: none"> • Service Building • UPS Diesel Building • Mechanical Draft Cooling Tower Structures • Miscellaneous Yard Structures: <ul style="list-style-type: none"> ○ Storm Drainage and Flood Control Structure, including the structural platform ○ Duct banks ○ Manholes ○ Foundations for: <ul style="list-style-type: none"> ▪ Condensate Storage Tank 	A.2.1.28	Prior to the period of extended operation.	Section B.2.1.28

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
		<ul style="list-style-type: none"> ▪ <i>Borated Water Storage Tank, including the Borated Water Storage Tank tunnel</i> ▪ <i>Altitude Tank</i> ▪ <i>Emergency Diesel Fuel Oil Storage Tank</i> • <i>Penetration seals which perform a License Renewal intended function for an in-scope structure.</i> • <i>Monitoring of the Intake Canal for loss of material and loss of form.</i> • <i>Monitoring of electrical panels, junction boxes, instrument panels, and conduits for loss of material due to corrosion.</i> • <i>Monitoring of ground water chemistry by periodically sampling, testing, and analysis of ground water to confirm that the environment remains non-aggressive for buried reinforced concrete.</i> • <i>Monitoring of reinforced concrete submerged in raw water associated with Intake Screen and Pumphouse, Circulating Water Pump House, Mechanical Draft Cooling Tower Structures, Natural Draft Cooling Tower Basins, and Circulating Water Tunnel.</i> • <i>Monitoring of vibration isolators, associated with component supports other than those covered by ASME XI, Subsection IWF, for reduction or loss of isolation function.</i> • <i>Monitoring of HVAC duct supports for loss of material.</i> • <i>Parameters monitored will be enhanced to include plausible aging effects and mechanisms.</i> • <i>Monitoring of concrete structures for a reduction in anchor capacity due to local concrete degradation. This will be accomplished by visual inspection of concrete surfaces around anchors for cracking, and spalling.</i> • <i>Revised acceptance criteria to provide details</i> 			

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
		<i>specified in ACI 349.3R-96.</i>			
29.	Protective Coating Monitoring and Maintenance Program	Existing program is credited.	A.2.1.29	Ongoing	Section B.2.1.29
30.	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	<p>Program is new.</p> <p>The program will be used to manage aging of non-EQ cables and connections during the period of extended operation. A representative sample of accessible cables and connections located in adverse localized environments will be visually inspected at least once every 10 years for indications of accelerated insulation aging such as embrittlement, discoloration, cracking, or surface contamination. 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 or connection.</p>	A.2.1.30	<i>Program and first inspections to be implemented prior to the period of extended operation.</i>	Section B.2.1.30
31.	Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements Used in Instrumentation Circuits	<p>Existing program is credited.</p> <p>The program will be enhanced to manage the aging of the cable and connection insulation of the in scope radiation monitoring and nuclear instrumentation circuits in the Radiation Monitoring and Nuclear Instrumentation and Incore Monitoring Systems. The in scope radiation monitoring and nuclear instrumentation circuits are sensitive instrumentation circuits with low-level signals and are located in areas where the cables and connections could be exposed to adverse localized environments caused by heat, radiation, or moisture. These adverse localized environments can result in reduced insulation resistance causing increases in leakage currents. Calibration testing and performance monitoring are currently being performed for in scope radiation monitoring circuits. Direct cable testing will be performed as an enhancement to ensure that the cable and connection insulation resistance is adequate for the nuclear instrumentation circuits to perform their intended functions.</p>	A.2.1.31	<i>Program, first tests and calibrations, and first assessment of calibration results to be implemented prior to the period of extended operation.</i>	Section B.2.1.31

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
32.	Inaccessible Medium Voltage Cables Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	<p>Program is new.</p> <p>The program will be used to manage the aging effects and mechanisms of non-EQ, in scope inaccessible medium voltage cables. These cables may at times be exposed to significant moisture simultaneously with significant voltage. The TMI-1 cables in the scope of this aging management program will be tested using a proven test for detecting deterioration of the insulation system due to wetting, such as power factor, partial discharge, or polarization index, as described in EPRI TR-103834-P1-2, or other testing that is state-of-the-art at the time the test is performed. The cables will be tested at least once every 10 years. Manholes associated with the cables included in this aging management program will be inspected for water collection, initially at least twice a year, in accordance with existing practices, and drained as required. The frequency will be adjusted based on inspection results recognizing that the objective of the inspections, as a preventive action, is to keep the cables infrequently submerged, thereby minimizing their exposure to significant moisture. The maximum time between inspections will be 2 years, which is in alignment with the recommended frequency in the NUREG-1801 AMP XI.E3.</p>	A.2.1.32	<i>Program and first tests and inspections to be implemented prior to the period of extended operation.</i>	<p>Section B.2.1.32</p> <p>Letter 5928-08-20208 dated 10/30/2008</p>

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
33.	Metal Enclosed Bus	<p>Existing program is credited.</p> <p>The program will be enhanced to include the following inspection criteria:</p> <ul style="list-style-type: none"> • The internal portion of the metal enclosed bus will be visually inspected for cracks, corrosion, foreign debris, excessive dust build-up and evidence of moisture intrusion. • The bus insulation will be visually inspected for signs of embrittlement, cracking, melting, swelling, or discoloration, which may indicate overheating or aging degradation. • The internal bus supports will be visually inspected for structural integrity and signs of cracks. <p>The program will also be enhanced to perform internal visual inspections on the 480V Metal Enclosed Bus and the Station Black Out Metal Enclosed Bus.</p>	A.2.1.33	<i>Program and first inspections and tests to be implemented prior to the period of extended operation.</i>	Section B.2.1.33
34.	Electrical Cable Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements	<p>Program is new.</p> <p>The program will be used to manage the aging effects of metallic parts of non-EQ electrical cable connections within the scope of license renewal during the period of extended operation. A representative sample of non-EQ electrical cable connections will be selected for one-time testing considering application (medium and low voltage), circuit loading (high loading) and location, with respect to connection stressors. The technical basis for the sample selected is to be documented. The specific type of test performed will be a proven test for detecting loose connections, such as thermography or contact resistance measurement, as appropriate to the application.</p>	A.2.1.34	<i>Program and one-time testing to be implemented prior to the period of extended operation.</i>	Section B.2.1.34

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
35.	Nickel Alloy Aging Management Program	Existing program is credited. TMI-1 commits to implement applicable Bulletins, Generic Letters, and staff-accepted industry guidelines.	A.2.2.1	Ongoing	Section B.2.2.1
36.	PWR Vessel Internals	TMI-1 commits to the following activities for the PWR Vessel Internals program: <ul style="list-style-type: none"> • Participate in the industry programs for investigating and managing aging effects on reactor internals. • Evaluate and implement the results of the industry programs as applicable to the reactor internals. • Upon completion of these programs, but not less than 24 months before entering the period of extended operation, submit an inspection plan for reactor internals to the NRC for review and approval. 	N/A	Prior to the period of extended operation.	N/A
37.	Metal Fatigue of Reactor Coolant Pressure Boundary	Existing program is credited. The program will be enhanced to add the statement: "Acceptable corrective actions include: reanalysis of the component to demonstrate that the design code limit will not be exceeded prior to or during the period of extended operation; repair of the component; replacement of the component, or other methods approved by the NRC." In addition, the program will be enhanced to require a review of additional reactor coolant pressure boundary locations if the usage factor for one of the environmental fatigue sample locations approaches its design limit.	A.3.1.1	Prior to the period of extended operation.	Section B.3.1.1
38.	Concrete Containment Tendon Prestress	Existing program is credited.	A.3.1.2	Ongoing	Section B.3.1.2
39.	Environmental Qualification (EQ) of Electrical Components	Existing program is credited.	A.3.1.3	Ongoing	Section B.3.1.3
40.	Steam Generators	Install new Once Through Steam Generators (OTSGs) prior to the period of extended operation.	N/A	Prior to the period of extended operation.	N/A

No.	Program or Topic	Commitment	UFSAR Supplement Location (LRA Appendix A)	Enhancement or Implementation Schedule	Source
41.	New P-T Curves	Revised pressure-temperature (P-T) limits and low-temperature overpressurization (LTOP) limits for a 60-year operating life have been prepared and will be submitted to the NRC for approval.	A.4.2.5	Prior to the period of extended operation or prior to exceeding 29 EFPY, whichever comes first.	Section 4.2.5
42.	Containment Liner Repair	Prior to the period of extended operation, TMI-1 will restore the Reactor Building liner to its nominal plate thickness by weld repair for the previously identified corroded areas of the Reactor Building liner where the thickness of the base metal is reduced by more than 10% of the nominal plate thickness.	N/A	Prior to the period of extended operation.	Letter 5928-08-20208 dated 10/30/2008
43.	Boral Test Coupon Surveillance	Boral test coupon surveillance will continue through the period of extended operation.	N/A	Ongoing	Letter 5928-08-20229 dated 11/12/2008