

October 29, 2009
TMI-09-143

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

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

Subject: Three Mile Island Unit 1 Notification of Deviation from EPRI 1016555,
"Secondary Water Chemistry Guidelines Revision 7" NEI 03-08 Needed
Guidance

- References:** (1) NEI 03-08, "Guidelines for the Management of Material Issues," Revision 1,
dated April, 2007.
- (2) EPRI 1016555, "Secondary Water Chemistry Guidelines," Revision 7, dated
December 22, 2008.

Exelon has prepared a deviation from a NEI 03-08 Guidelines for the Management of Material Issues," (Reference 1) Needed Work product element in EPRI 1016555, "Secondary Water Chemistry Guidelines Revision 7" (Reference 2).

An EPRI-sponsored trial for using dispersants during steam generator wet lay-up is being performed on the Once-Through Steam Generators (OTSG) prior to removal during T1R18. Both steam generators will be placed in wet lay-up condition and chemically treated and monitored as recommended in the guidelines. However, the use of the dispersant chemical may impact certain laboratory analysis required by Table 6-1 of the subject guidelines during the performance of this trial on the "A" OTSG.

The deviation is only for certain monitoring requirements on the "A" steam generator, which may not be met due to the effect of the dispersant chemical on the laboratory analysis. All analysis will be performed on the "B" steam generator. During previous outages, the chemical analysis results on both steam generators were comparable. Because the steam generators are being chemically treated in accordance with the EPRI guidelines, and because one of the two steam generators will be fully monitored in accordance with the guidelines, no adverse consequences are anticipated and technical justification for returning the equipment to service and analysis of the potential effects of not performing certain chemical analysis on one of the steam generators is not needed. The significance of this deviation is further mitigated by the fact that the steam generators will be removed after completion of the trial, and will not be returned to service.

NEI 03-08 (Reference 1) allows deviation from "Needed" elements with the appropriate justification and documentation. The deviation was approved with the appropriate levels of Exelon management.

This notification is provided for information and no approval or action is expected. Should you have any questions concerning this letter, please contact Dave Morey at (630) 657-2525.

Respectfully,

A handwritten signature in black ink, appearing to read 'W. Noll', written in a cursive style.

William Noll
Site Vice President, Three Mile Island Unit 1
Exelon Corporation, LLC

Attachment: Summary of the Deviation

cc: Regional Administrator, USNRC Region I
Director, Division of Component Integrity, ADES, NRR, USNRC
Project Manager, NRR, USNRC – Three Mile Island, Unit 1
Senior Resident Inspector, USNRC – Three Mile Island
Director, Bureau of Radiation Protection – Pennsylvania Department of Environmental
Protection

ATTACHMENT

Three Mile Island Unit 1

Summary of the Deviation

NEI 03-08 Materials Guidelines Deviation Protocol

Nuclear Energy Institute (NEI) document NEI 03-08, "Guidelines for the Management of Material Issues," allows deviations from "Needed" work product elements with the appropriate justification and documentation.

Summary

An EPRI-sponsored trial for using dispersants during steam generator wet lay-up is being performed on the old Once-Through Steam Generators (OTSG) prior to removal during T1R18. Both steam generators will be placed in lay-up condition and monitored as recommended in the guidelines. However, the use of the dispersant chemical may impact certain laboratory analysis required by Table 6-1 of the subject guidelines during the performance of this trial on the "A" OTSG.

Guidance Being Deviated From

Table 6-1 of EPRI 1016555, "Secondary Water Chemistry Guidelines," Revision 7, dated December 22, 2008 requires monitoring of several chemistry parameters. These parameters will be monitored for both OTSGs during lay-up, however the use of the dispersant chemical may impact certain laboratory analysis resulting in an out of specification condition during the trial on the "A" OTSG.

Justification for the Deviation

Both OTSG's will be treated identically from a lay-up chemistry perspective, with the exception of the dispersant chemical addition to the "A" OTSG. Past experience has shown that lay-up chemistry and impurity behavior has been similar in both OTSG's. Because the steam generators are being replaced after the test and will not be placed back into service, potential effects of incorrectly placing the OTSGs into lay-up will not affect plant operation.

Actions Undertaken in Lieu of the Guidance

Consistent with the guidelines, all chemistry parameters will be sampled and analyzed for the "B" OTSG. This will give adequate indication of the lay up condition of the "A" OTSG.