



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

September 8, 2010

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST
TO ADOPT TSTF-425, RELOCATION OF SURVEILLANCE FREQUENCIES TO
A LICENSEE-CONTROLLED PROGRAM (TAC NO. ME3587)

Dear Mr. Pacilio:

By letter dated March 24, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100840205), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) proposing to revise the Technical Specifications (TSs) for Three Mile Island Nuclear Station, Unit 1. The proposed changes would relocate certain surveillance frequencies to a licensee-controlled program through the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies." According to the submittal, the changes are consistent with U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specifications Task Force (TSTF) Standard Technical Specifications (STSs) change TSTF-425, "Relocate Surveillance Frequencies to Licensee Control - Risk Informed Technical Specifications Task Force Initiative 5b," Revision 3.

The Nuclear Regulatory Commission staff has been reviewing the response and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). The questions were sent via electronic transmission on August 17, 2010, to Mr. Glenn Stewart, of your staff. The draft questions were sent to ensure that the questions were understandable, the regulatory basis for the questions was clear, and to determine if the information was previously docketed. The draft questions were discussed in a teleconference with Mr. Stewart on August 23, 2010. It was agreed that a response to this RAI would be submitted by October 15, 2010.

Please contact me at 301-415-2833, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Peter Bamford".

Peter Bamford, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:
As stated

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REQUEST FOR ADDITIONAL INFORMATION
THREE MILE ISLAND NUCLEAR STATION, UNIT 1
PROPOSED RELOCATION OF SURVEILLANCE FREQUENCIES
TO A LICENSEE-CONTROLLED PROGRAM
DOCKET NO. 50-289

By letter dated March 24, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100840205), Exelon Generation Company, LLC (Exelon, the licensee), submitted a license amendment request (LAR) for Three Mile Island Nuclear Station, Unit 1 (TMI-1). The licensee proposes to modify the TMI-1 Technical Specifications (TSs) by relocating certain surveillance frequencies to a licensee-controlled program through the implementation of Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Technical Specifications Initiative 5b, Risk-Informed Method for Control of Surveillance Frequencies." According to the licensee, the changes are consistent with U.S. Nuclear Regulatory Commission (NRC)-approved Technical Specifications Task Force (TSTF) Standard Technical Specifications (STSS) change TSTF-425, "Relocate Surveillance Frequencies to Licensee Control - Risk Informed Technical Specifications Task Force Initiative 5b," Revision 3. In order for the NRC staff to complete its review of the LAR, a response to the following request for additional information (RAI) is requested.

RAI-1

Certain of the proposed specifications do not clearly delineate that only the required frequency of surveillance is controlled by the surveillance frequency control program (SFCP). For example, proposed TS 3.5.2.4.g states that "Quadrant tilt shall be monitored... in accordance with the surveillance frequency control program..." In order to clearly delineate what the SFCP is authorized to control, this wording should be "Quadrant tilt shall be monitored... *at a frequency* in accordance with the surveillance frequency control program..." or similar wording (italics added). This applies to proposed TSs located on pages 3-34a, 3-35a, 3-59, 4-3, 4-29, 4-39, 4-41, 4-42, 4-43, 4-44, 4-45, 4-46, 4-47, 4-52, 4-52a, 4-54, 4-55, and 4-86 of the LAR. Please provide revised specification pages that incorporate this clarification.

RAI-2

Proposed revised TS 3.14.1.1, relating to periodic inspection of the dikes around TMI, is a site-specific specification not contained in NUREG-1430 "Standard Technical Specifications Babcock and Wilcox Plants," and therefore not included as a line item in TSTF-425. As described in the LAR, Attachment 3, page 3-59, this surveillance relates directly to protection against external flooding. Attachment 2 of the LAR, page 21 of 23, states that external flooding was evaluated in the IPEEE [Individual Plant Examination for External Events] and a CDF [core damage frequency] estimated, and that this evaluation has not been maintained. Please describe, for a relocated dike surveillance frequency, how an analysis for a surveillance frequency change of the dike inspections would incorporate recent site-specific information and use up-to-date databases, if the external flooding analysis is not maintained. Alternatively, please submit a revised application removing the dike surveillance from the scope of this LAR.

Enclosure

September 8, 2010

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

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Sincerely,
/ra/

Peter Bamford, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:

As stated

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ADAMS Accession Number: ML102300078 * via electronic concurrence

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DATE	8/23/10	09/01/10	09/08/10

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