

December 5, 2011

MEMORANDUM TO: Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Peter Bamford, Project Manager */ra/*
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: THREE MILE ISLAND, UNIT NO. 1 - ELECTRONIC TRANSMISSION,
DRAFT REQUEST FOR ADDITIONAL INFORMATION REGARDING
PROPOSED LICENSE AMENDMENT REVISING TECHNICAL
SPECIFICATIONS TO INCORPORATE ADMINISTRATIVE CHANGES
(TAC NO. ME7357)

The attached draft request for additional information (RAI) was transmitted by electronic transmission on December 2, 2011, to Ms. Wendi Croft, at Exelon Generation Company, LLC (Exelon, the licensee). This draft RAI was transmitted to facilitate the technical review being conducted by the Nuclear Regulatory Commission (NRC) staff and to support a conference call (if needed) with Exelon in order to clarify the licensee's amendment request regarding certain proposed administrative changes to the facility technical specifications. The draft RAI is related to the licensee's submittal dated October 18, 2011. The draft questions were sent to ensure that they were understandable, the regulatory basis was clear, and to determine if the information was previously docketed. Additionally, review of the draft RAI would allow Exelon to evaluate and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not represent an NRC staff position.

Docket Nos. 50-289

Enclosure: As stated

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DRAFT REQUEST FOR ADDITIONAL INFORMATION

THREE MILE ISLAND, UNIT 1

PROPOSED ADMINISTRATIVE CHANGES TO THE

TECHNICAL SPECIFICATIONS

DOCKET NO. 50-289

By application dated October 18, 2011 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML112911548), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request regarding proposed changes to the technical specifications (TSs) for Three Mile Island, Unit 1 (TMI-1). The proposed amendment involves administrative changes. The proposed changes include correcting typographical errors, removing unwarranted formatting, clarifying symbols and pages, reformatting of previously deleted pages, incorporating a consistent abbreviation of average reactor coolant temperature, deleting notes that are no longer applicable, and replacing certain drawing figures with versions that are more clear and which correct references to a previous licensee name (AmerGen). The Nuclear Regulatory Commission (NRC) staff has been reviewing the submittal and has determined that additional information is needed to complete its review.

- 1.) In the application, Attachment 1, page 3 of 6, the tenth bullet states, "TS 3.5.2.5.b.1 and 2 on page 3-35 are edited to remove an erroneous period (.)" The existing TS 3.5.2.5.b.1 does not appear to contain an erroneous period. Please clarify or correct the submittal.
- 2.) The submitted markup and "clean copy" page versions (Attachments 2 and 3, respectively) for TS page 4-5 do not appear to reflect the current TS page 4-5. Specifically they do not appear to reflect changes authorized by TMI-1 TS Amendment 273, dated May 27, 2010 (ADAMS Accession No. ML092740791), and letters dated March 4, 2011 (ADAMS Accession No. ML110550707), and October 27, 2011 (ADAMS Accession No. ML112980458). In particular, item numbers 23 and 24 on page 4-5 appear to be in error. A similar problem affects pages 1-3 and 3-35. Please submit corrected markup and "clean copy" versions of these pages, as appropriate.
- 3.) According to the application, Attachment 1, page 4 of 6, TS Figure 5-1 has been updated for clarity and to revise the title box to reflect Exelon, the current licensee. TS Figure 5-1 is referenced by TS 5.1.1 (note that TS 5.1.1 refers to Figure 5.1) and describes it as an "extended plot plan," consistent with the List of Figures on TS page vii. TS 5.1.1 also states that Figure 5.1 (5-1) shows the TMI Exclusion Area. The extended plot plan title and the exclusion area depiction have been removed from the revised Figure 5-1, making TS 5.1.1 confusing and incorrect. In addition, TS 5.1.1 states that Figure 5.1(5-1) shows the immediate surroundings, however the revised Figure 5-1 has eliminated some of the surrounding features such as the depiction of the offsite

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transmission lines. Please correct the revised Figure 5-1 consistent with the existing TS 5.1.1, and/or justify any desired changes to Figure 5-1, the List of Figures, and/or TS 5.1.1.

- 4.) TS 5.1.1 describes Figure 5-2 as depicting the site topography for a radius of 5 miles from the station. The revised Figure 5-2 appears to have deleted the topographical lines. Therefore, please submit a revised Figure 5-2 that includes topographical information or justify, and submit, a revised TS 5.1.1.

The NRC staff also has several observations regarding the submittal and the existing TSs. As described above, the NRC staff notes that TS 5.1.1 refers to Figure 5-1 as Figure 5.1. Exelon should consider clarifying this discrepancy. In addition, the NRC staff notes that TS 5.1.1 refers to a “weather tower” depicted on Figure 5-3. Both the existing and revised Figure 5-3 depictions show a “weather station”. Exelon should consider making this terminology consistent. Finally the existing TS 5.1.1 refers to AmerGen Energy Company, LLC in the description of Figure 5.1(5-1). Exelon should evaluate whether this is the correct terminology.