

TMI-14-042

March 24, 2014

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

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

Subject: Response to Request for Additional Information Regarding Request for Amendment to Eliminate Certain Three Mile Island Nuclear Station, Unit 1 Technical Specification Reporting Requirements

- References:
- 1) Letter from M. D. Jesse (Exelon Generation Company, LLC) to the U.S. Nuclear Regulatory Commission, "Request for Amendment to Eliminate Certain Three Mile Island Nuclear Station, Unit 1 Technical Specification Reporting Requirements," dated February 4, 2013
 - 2) Letter from J. D. Hughey (U.S. Nuclear Regulatory Commission) to M. J. Pacilio (Exelon Generation Company, LLC), "Three Mile Island Nuclear Station, Unit 1 - Request for Additional Information regarding Proposed License Amendment Request to revise Technical Specification Reporting Requirements (TAC NO. MF0628)," dated February 27, 2014

By letter dated February 4, 2013, Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) for Three Mile Island Nuclear Station, Unit 1 (TMI-1) (Reference 1). The LAR relates to the proposed deletion of various reporting requirements that are encompassed in the current TMI-1 Technical Specifications.

In the Reference 2 letter, the U.S. Nuclear Regulatory Commission requested additional information. Attached is our response.

Exelon has concluded that the information provided in this response meets the intent of the original submittal (Reference 1) and does not impact the conclusions of the: 1) Technical Analysis, 2) No Significant Hazards Consideration under the standards set forth in 10 CFR 50.92(c), or 3) Environmental Consideration as provided in the original submittal (Reference 1).

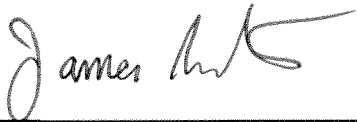
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There are no regulatory commitments in this letter.

If you have any questions concerning this letter, please contact Stephanie J. Hanson at 610-765-5143.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 24th day of March 2014.

Respectfully,



James Barstow
Director - Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information regarding Proposed License Amendment Request to revise Technical Specification Reporting Requirements

cc: USNRC Region I, Regional Administrator
USNRC Senior Resident Inspector, TMI, Unit 1
USNRC Project Manager, TMI, Unit 1
R. R. Janati, Bureau of Radiation Protection

ATTACHMENT 1

**Response to Request for Additional Information regarding Proposed License
Amendment Request to revise Technical Specification Reporting
Requirements for Three Mile Island Nuclear Station, Unit 1**

Question 1:

The NRC staff concurs that the reactor coolant specific activity data is reported to the NRC via the PI program under the ROP. While the PI program reports reactor coolant specific activity, it does not report all of the information contained in TS 6.9.1.B.5, under the circumstances where activity exceeds the limits of TS 3.1.4.1. Therefore, please provide justification for all of the proposed deletions under this TS section.

Response:

Nuclear power plants such as Virgil C. Summer, added this reporting requirement in response to Generic Letter 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes." However, as stated in the Commission's Safety Evaluation for Virgil C. Summer Nuclear Station, Unit No. 1, Issuance of Amendment Regarding Elimination of Monthly Operating Reports and Certain Annual Reports (TAC NO. MC9155) dated May 19, 2006, which approved the deletion of the reporting requirement pertaining to specific activity; it is no longer common within Technical Specifications (TSs) for nuclear power plants and is not within Standard Technical Specifications (STS) outlined in NUREG-1430. Additionally, the NRC would expect to obtain information about such events or conditions through reports submitted in accordance with 10 CFR 50.72, "Immediate notification requirements for operating nuclear reactors," and 10 CFR 50.73, "Licensee event report system." For example, similar to V.C. Summer's TS, it is noted that exceeding TMI TS 3.1.4.1 limits requires a plant shutdown if the activity is not restored to within limits within the specified time period, and such a plant shutdown is required to be reported by 10 CFR 50.72. The NRC also obtains information about plant events and adverse conditions through its inspection program.

The specific activity analysis reported annually does not report any information different from the Performance Indicator (PI) Program unless the activity exceeds the TS 3.1.4.1 limit. The removal of the report is intended to eliminate unnecessary use of NRC and plant resources to review redundant data. At TMI, the TS limit has not been exceeded for more than 18 years (> 9 full cycles) of operation. The limit is not expected to be exceeded unless a significant plant (fuel) issue occurs, which would result in the application of significant plant resources and determine the need for communication with the NRC. For example, in the event that a fuel defect occurs, which would affect the specific activity limits as required by Exelon's Failed Fuel Action Plan procedure (NF-AA-430), the defect would be captured in the Corrective Action Program (CAP), which requires a Root Cause Analysis (RCA) to be performed and an immediate evaluation for reportability to the NRC under the 10 CFR 50.72(b)(3)(ii) reporting criteria. Through the above procedure, all of the additional specific activity analysis is required to be examined in order to evaluate the event. Thus, the information stated in items 6.9.1.B.5.a through e is included as part of the RCA, and would be available for NRC review through its inspection program. Note also that the PI Program would continue to provide all of the other typical radioisotope data.

Question 2:

Are significant changes to the radioactive waste treatment systems reported in the TMI annual effluent report? If not, please supplement the LAR with a statement that the TMI Updated Final Safety Analysis Report will be revised to include these changes in the annual effluent report.

Response:

TMI does not currently report significant changes to the radioactive waste treatment systems in the TMI annual effluent report. The TMI Updated Final Safety Analysis Report will be revised to include these changes in the annual effluent report.