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10 CFR 50.90

TMI-14-121

September 26, 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 License Amendment Request To Eliminate Certain Technical Specification Reporting Requirements (TAC NO. MF0628)

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

3) Letter from J. Barstow (Exelon Generation Company, LLC) to the U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information Regarding Request for Amendment to Eliminate Certain Three Mile Island Nuclear Station, Unit 1 Technical Specification Reporting Requirements," dated March 24, 2014

4) Letter from J. G. Lamb (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 License Amendment Request To Eliminate Certain Technical Specification Reporting Requirements (TAC NO. MF0628)," dated September 4, 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) (Reference 1). The LAR relates to the proposed deletion of various reporting requirements that are encompassed in the current TMI Technical Specifications.

In the Reference 2 letter, the U.S. Nuclear Regulatory Commission requested additional information. Exelon responded in Reference 3. In the Reference 4 letter, NRC determined that additional information is needed to complete its review. Attachment 1 contains our response.

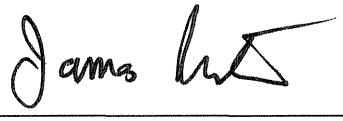
Exelon has concluded that the information provided in this response meets the intent of the original submittal (Reference 1) and does not impact the conclusions of the: 1) Technical Analysis, 2) No Significant Hazards Consideration under the standards set forth in 10 CFR 50.92(c), or 3) Environmental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

One regulatory commitment is contained in Attachment 2.

If you have any questions concerning this letter, please contact Frank J. Mascitelli at 610-765-5512.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 26th day of September 2014.

Respectfully,



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

Attachments: 1) Response to Request for Additional Information Regarding License Amendment Request to Eliminate Certain Technical Specification Reporting Requirements (TAC NO. MF0628)
2) Summary of Regulatory Commitments

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

ATTACHMENT 1

Response to Request for Additional Information Regarding License Amendment Request to Eliminate Certain Technical Specification Reporting Requirements (TAC NO. MF0628)

Response to Request for Additional Information

License Amendment Request Regarding
License Amendment Request to Eliminate Certain Technical Specification Reporting Requirements (TAC NO. MF0628)

In the Reference 1 letter, Exelon Generation Company, LLC (Exelon) requested changes that would modify various Three Mile Island Nuclear Station, Unit 1 (TMI) reporting requirements contained in Technical Specifications (TS). The NRC reviewed the license amendment request and identified the need for additional information in order to complete their evaluation of the license amendment request. A request for additional information (RAI) was transmitted to Exelon on September 4, 2014 (Reference 4). The question is restated below along with Exelon's response.

Question:

The Periodic Leak Reduction Program is not currently specified in the TSs for TMI-1. Is the Periodic Leak Reduction Program described in the licensing basis? If so, please describe. If not, why not and describe where the Periodic Leak Reduction Program is maintained and controlled in TMI-1 documents? Please explain how the TMI-1 commitment for the Periodic Leak Reduction Program will continue to be met upon the proposed deletion of the subject TS reporting requirements.

Response:

The Periodic Leak Reduction Program is not specifically described in the TMI Updated Final Safety Analysis (UFSAR). However, in regards to the Engineered Safeguards Systems leakage and radiation consideration post-accident conditions, UFSAR Section 6.4.3, Bases of Leakage Estimates, states:

> "While the reactor auxiliary systems involved in the recirculation complex are closed to the Auxiliary Building atmosphere, leakage is possible through component flanges, seals, instrumentation, and valves.
>
> The leakage sources considered are:
>
> a. Valves
> 1) Disc leakage when valve is on recirculation system boundary
> 2) Stem leakage
> 3) Bonnet flange leakage
>
> b. Flanges
>
> c. Pump shaft seals
>
> While leakage rates have been assumed for these sources, maintenance and periodic testing of these systems will preclude all but a small percentage of the assumed amounts. With the exception of the boundary valve discs, all of the

potential leakage paths may be examined during periodic tests or normal operation. These periodic tests are performed IAW TS 4.5.4. The boundary valve disc leakage is retained in the other closed systems and, therefore, will not be released to the Auxiliary Building, or will be confirmed to be less than 3 GPM by periodic testing."

The Periodic Leakage Reduction Program is currently controlled by the annual reporting requirement in TS 6.9.1.B.3, which drives the scheduling of the specific leakage surveillance tests or examinations. The station manages the scheduling of each of these surveillances as TS requirements to ensure that they are performed at the refueling interval. Each of these leakage surveillance procedures references NUREG-0737, "Clarification of TMI Action Plan Requirements," as a purpose for the test. Each completed surveillance procedure includes documentation of any identified leakage, which is then dispositioned through the Corrective Action Program (CAP) and later documented in the annual submittal.

The proposed change does not alter the current Periodic Leak Reduction Program, only its reporting requirements. The TMI commitment for the Periodic Leak Reduction Program will continue to be met upon the proposed deletion of the subject TS reporting requirements. TMI will incorporate a description of the Periodic Leak Reduction Program into the licensing basis by revising UFSAR Section 6.4, "Engineered Safeguards Leakage and Radiation Considerations," (see Attachment 2).

ATTACHMENT 2

Summary of Regulatory Commitments

SUMMARY OF REGULATORY COMMITMENTS
Page 1 of 1

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes/No)	PROGRAMMATIC (Yes/No)
Incorporate a description of the Periodic Leak Reduction Program into the licensing basis by revising UFSAR Section 6.4, "Engineered Safeguards Leakage and Radiation Considerations."	60 days after approval of License Amendment Request	NO	YES