



Three Mile Island Unit 1
Route 441 South, P.O. Box 480
Middletown, PA 17057
Telephone 717-948-8000

TMI-15-102
September 10, 2015

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

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

Subject: Clarification of Commitment Regarding Resolution of Generic Letter 2004-02

References: 1. Letter from R. W. Libra (Exelon Generation Company, LLC) to U.S. NRC, "TMI, Unit 1 Plant-Specific Path and Schedule for Resolution of Generic Letter 2004-02," dated May 16, 2013

In a letter to the NRC dated May 16, 2013, Three Mile Island Unit 1 provided the plant specific path and schedule for resolution of Generic Letter 2004-02 (Reference 1). Attachment 2 of this letter included the following commitment:

"Replace the Nukon insulation currently installed on the pressurizer with Reflective Metallic Insulation (RMI) for TMI, Unit 1."

This was a one-time action with a committed date of the T1R21 Refueling Outage in the fall of 2015.

The purpose of this letter is to provide the following clarification related to this commitment:

In Section 3.1 of Reference 1, it was stated that "replacing the pressurizer NUKON insulation with RMI will result in removal of an additional 454 ft³ of NUKON insulation." During the T1R21 refueling outage this fall, TMI will be replacing approximately 80% of the NUKON insulation on the pressurizer. NUKON insulation will not be replaced on the pressurizer upper head or inside the pressurizer structural support. Preliminary debris analyses and strainer test results indicate that the reduction in fibrous debris due to the removal of approximately 80% of the pressurizer NUKON insulation will be adequate with respect to ECCS pump NPSH concerns. This reduction in NUKON insulation will also reduce the quantity of fibrous debris bypassing the strainer. As stated in Section 3.3 of Reference 1, TMI is continuing to participate in the PWROG efforts to determine the in-vessel debris limits.

As of the date of this letter, TMI does not anticipate that any further reductions in the amount of NUKON insulation remaining in the Reactor Building will be necessary.

A114
NRR

U.S. Nuclear Regulatory Commission
Clarification of Commitment
Regarding Resolution of Generic Letter 2004-02
September 10, 2015
Page 2

There are no changes to the other commitments contained in Reference 1.

Should you have any questions concerning this letter, please contact Mike Fitzwater at (717) 948-8228.

Respectfully,



E. W. Callan, Jr.

Site Vice President, Three Mile Island Unit 1
Exelon Generation Company, LLC

cc: USNRC Region I, Regional Administrator
USNRC Project Manager, TMI, Unit 1
USNRC Senior Resident Inspector, TMI, Unit 1