



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

10 CFR Part 54

TMI-16-090

September 16, 2016

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: Submittal of Inspection Plan for Reactor Internals, A/LAI #7 Component Evaluation

- References:
- 1) NUREG-1928, "Safety Evaluation Report Related to the License Renewal of Three Mile Island Nuclear Station, Unit 1," dated October 2009
  - 2) Letter from M.D. Jesse (Exelon Generation Company, LLC) to US Nuclear Regulatory Commission, "Submittal of Inspection Plan for Reactor Internals," dated April 16, 2012
  - 3) Letter from D. P. Helker (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Submittal of Inspection Plan for Reactor Internals," dated April 17, 2013
  - 4) Internal Memorandum from R. Ennis (Senior Project Manager, U.S. Nuclear Regulatory Commission) to V. Rodriguez (Acting Chief, U.S. Nuclear Regulatory Commission), "Three Mile Island Nuclear Station, Unit 1, Draft Request for Additional Information (TAC NO. MF1459)," ML 13269A 179, dated September 25, 2013
  - 5) Letter from James Barstow (Exelon Generation Company, LLC) to US Nuclear Regulatory Commission, "Submittal of Inspection Plan for Reactor Internals," dated November 6, 2013.
  - 6) Letter from Meena K. Khanna (Chief, US Nuclear Regulatory Commission), "Three Mile Island Nuclear Station, Unit 1 – Staff Assessment of the Reactor Vessel Internals Inspection Plan (TAC No. MF1459)," dated December 19, 2014

In the Reference 2 letter, Exelon Generation Company, LLC (Exelon) submitted the inspection plan for the Three Mile Island (TMI), Unit 1 Reactor Vessel Internals (RVI) ("Inspection Plan for the Three Mile Island Unit 1 Reactor Vessel Internals," ANP 2952, Revision 1, March 2012). The Reference 3 letter provided updates to the commitments contained in the Reference 2 letter. The Reference 5 letter responded to Nuclear Regulatory Commission (NRC) Request for Additional Information (RAI), Reference 4, and modified commitments in the Reference 3 letter based on changes in the TMI scheduled inspection outages. The Reference 6 letter communicated the NRC's Staff Safety Assessment and acceptance of the TMI RVI inspection plan.

TOD7  
NRK

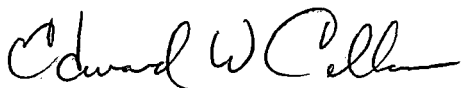
In the Reference 5 letter TMI made the following commitment:

*The analysis and evaluation of the Control Rod Guide Tube (CRGT) Spacer Castings is in progress with the PWROG, with an estimated completion date of December 31, 2013. The Incore Monitoring Instrumentation (IMI) Spider Castings evaluation will be pursued as a TMI, Unit 1 plant-specific analysis and evaluation, separate from the CRGT Spacer Casting analyses being performed by the PWROG. TMI will submit the CRGT Spacer Castings and IMI Spider Castings evaluations to the NRC by October 30, 2016, which is approximately one year prior to the inspection outage (2017). Additionally, the vent valve retaining ring analysis will also be submitted by October 30, 2016.*

Attachment 1 contains the proprietary response to the above listed commitment as provided by AREVA Inc. Attachment 2 contains the non-proprietary response to the above listed commitment as provided by AREVA Inc. Attachments 1 and 2 fulfill the TMI commitment to provide the evaluation of the CRGT Spacer Castings, IMI Spider Castings, and Vent Valve Retaining Rings for Applicant/Licensee Action Item 7 (Table D-2 of 77-2952-001), based upon Section 4.2.7 of the NRC Safety Evaluation Report for MRP-227-A.

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

Respectfully,



Edward W. Callan  
Site Vice President, Three Mile Island Unit 1  
Exelon Generation Company, LLC

- Attachments: 1) "MRP-227-A Applicant/Licensee Action Item 7 Analysis for Three Mile Island Unit 1, Topical Report," ANP-3479P, Revision 0, Proprietary Version  
2) "MRP-227-A Applicant/Licensee Action Item 7 Analysis for Three Mile Island Unit 1, Topical Report," ANP-3479-NP, Revision 0, Non-Proprietary Version  
3) Affidavit

cc: Regional Administrator, Region I, USNRC  
USNRC Senior Resident Inspector, TMI  
USNRC Project Manager, [TMI] USNRC

**Attachment 3**

Affidavit

# Controlled Document

## AFFIDAVIT

STATE OF NORTH CAROLINA            )  
  ) ss.  
COUNTY OF MECKLENBURG            )

1. My name is Thomas E Ryan. I am Manager, Product Licensing, for AREVA Inc. (AREVA) and as such I am authorized to execute this Affidavit.

2. I am familiar with the criteria applied by AREVA to determine whether certain AREVA information is proprietary. I am familiar with the policies established by AREVA to ensure the proper application of these criteria.

3. I am familiar with the AREVA information contained in the AREVA document ANP-3479P, Revision 0, "MRP-227-A Applicant/Licensee Action Item 7 Analysis for Three Mile Island Unit 1," and referred to herein as "Document." Information contained in this Document has been classified by AREVA as proprietary in accordance with the policies established by AREVA Inc. for the control and protection of proprietary and confidential information.

4. This Document contains information of a proprietary and confidential nature and is of the type customarily held in confidence by AREVA and not made available to the public. Based on my experience, I am aware that other companies regard information of the kind contained in this Document as proprietary and confidential.

5. This Document has been made available to the U.S. Nuclear Regulatory Commission in confidence with the request that the information contained in this Document be withheld from public disclosure. The request for withholding of proprietary information is made in accordance with 10 CFR 2.390. The information for which withholding from disclosure is

# Controlled Document

requested qualifies under 10 CFR 2.390(a)(4) "Trade secrets and commercial or financial information."

6. The following criteria are customarily applied by AREVA to determine whether information should be classified as proprietary:

- (a) The information reveals details of AREVA's research and development plans and programs or their results.
- (b) Use of the information by a competitor would permit the competitor to significantly reduce its expenditures, in time or resources, to design, produce, or market a similar product or service.
- (c) The information includes test data or analytical techniques concerning a process, methodology, or component, the application of which results in a competitive advantage for AREVA.
- (d) The information reveals certain distinguishing aspects of a process, methodology, or component, the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- (e) The information is vital to a competitive advantage held by AREVA, would be helpful to competitors to AREVA, and would likely cause substantial harm to the competitive position of AREVA.

The information in this Document is considered proprietary for the reasons set forth in paragraphs 6(b), 6(c) and 6(d) above.

7. In accordance with AREVA's policies governing the protection and control of information, proprietary information contained in this Document has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.

8. AREVA policy requires that proprietary information be kept in a secured file or area and distributed on a need-to-know basis.

Controlled Document

9. The foregoing statements are true and correct to the best of my knowledge, information, and belief.

Thomas E. Ryan

SUBSCRIBED before me this 20<sup>th</sup>  
day of August, 2016.

Thomas A. Casias

THOMAS A CASIAS  
Notary Public, North Carolina  
Mecklenburg County  
My Commission Expires  
December 15, 2019

Thomas A. Casias  
NOTARY PUBLIC, STATE OF NORTH CAROLINA, COUNTY OF MECKLENBURG  
MY COMMISSION EXPIRES: 15 December 2019  
#200935100003