UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

DOCKET NO. 50-320
LICENSE NO. DPR-73

METROPOLITAN EDISON COMPANY

This is to certify that a copy of Technical Specification Change Request No. 009 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 2, has, on the date given below, been filed with the U. S. Nuclear Regulatory Commission and been served on the chief executives of Londonderry Township, Dauphin County, Pennsylvania and Dauphin County, Pennsylvania by deposit in the United States mail, addressed as follows:

Mr. Weldon B. Arehart
Board of Supervisors of
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R. D. #1, Geyers Church Road
Middletown, Pennsylvania 17057

Mr. Harry B. Reese, Jr.
Board of County Commissioners
of Dauphin County
Dauphin County Court House
Harrisburg, Pennsylvania 17120

METROPOLITAN EDISON COMPANY

By J G Herlein
Vice President

Dated: May 19, 1978

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Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320

Technical Specification Change Request No. 009

The License requests that the attached changed page replace page 3/4 6-5 of the existing Technical Specifications.

Reason for Change Request

The present wording of the TMI-2 Technical Specifications requires that containment air lock seal leak rate testing be performed "by pressure decay when the volume between the door seals is pressurized to ≥ 10 psig..." The acceptance criteria specified, (Leakage ≥ 0.01 La) translates to a pressure drop of 10 psig in a period of < 10 seconds. This is inconsistent with the additional requirement to maintain door seals pressurized to ≥ 10 psig for at least 15 minutes. Therefore, the NRC Inspection and Enforcement group for Region I, requested that a Technical Specification Change Request be filed. In addition because the manufacturer has indicated that the volume between the door seals should not be pressurized above 10 psig, and because the volume between the door seals is quite small (∿ 0.02 cu. ft.), it is not possible to perform the surveillance using the pressure decay method. It is therefore requested that the requirement specifying the testing method be deleted from the wording of the Technical Specification Surveillance Requirement (4.6.1.3). This would allow measurement of leak rate testing by another method (e.g. the flow monitoring method). This change deletes the requirement to measure seal leakage by a pressure drop test method, and specifies the pressure at which the seal leak rate is to be determined by using a flow meter.

Safety Analysis Justifying Change

The basis of the surveillance requirement is to provide assurance that the containment leakage rates of Limiting Condition for Operation 3.6.1.2 are not exceeded as a result of seal damage occurring during door usage.

This Technical Specification Change does not change the limit established for allowable leakage through the door seals. This limit remains ≥ 0.01 La (1% of the total allowable containment leak rate.)

The requested change deletes the requirement that the containment air lock door seal leak rate be measured by the pressure decay test method, and includes the pressure at which the seal leak rate is to be determined when directly measuring the leakage flow rate.

Because the acceptance criteria for allowable door seal leakage rate is not being changed, the requested revision does not constitute a change involving an unreviewed safety question.

Amendment Class (10 CFR 170)

The Licensee has determined that because this amendment has no safety or environmental significance (in that the acceptance criteria remains unchanged), this is a Class II License Amendment (per 10 CFR 170.22). Therefore, enclosed please find a check in the amount of $1,200.00.

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CONTAINMENT AIR LOCKS

LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE with:

a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed.

b. An overall air lock leakage rate of $\leq 0.05\ L_a$ at P_a, 56.2 psig.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With an air lock inoperable, maintain at least one door closed; restore the air lock to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:

a* After each opening, except when the air lock is being used for multiple entries, then at least once per 72 hours, by verifying $\leq 0.01\ L_a$ seal leakage when the volume between the door seals is stabilized to a pressure of 10 psig.

b. At least once per 6 months by conducting an overall air lock leakage test at P_a, 56.2 psig, and by verifying that the overall air lock leakage rate is within its limit.

c. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

*Exemption to Appendix "J" of 10 CFR 50.

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