NRC FORM 195 (2-76) U.S. NUCLEAR REGULATORY COMMISSION

DOCKET NUMBER 50-289

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DESCRIPTION: Ltr trans the following:

(3P)

ENCLOSURE: Tech Spec Change Request No. 43, Amdt #1 notarized 1-7-77 consist of replacement pages for Appendix A containing changes to incorporate steam generators operating & inservice inspection requirements into TMI-1 TechSpecs.....(3 Orig & 37 CC) (14P)

CERTIFICATE OF SERVICE dated 1-7-77 shwoing svc of Tech Spec Change upon Mr. W. B. Arehart, Bd. of Supvr of Londonderry Township, Middletown, Pa. e.t al.....(1 Orig & 39 CC) (1P)

ACKNOWLEDGED

DO NOT remove

PLANT NAME: Three Mile Island Unit 1

FOR ACTION/INFORMATION — ENVIRO — DHL 1-19-77

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Director of Nuclear Reactor Regulation
Attn: R. W. Reid, Chief
Operating Reactors Branch No. 4
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Docket No. 50-289
Operating License No. DPR-50
Technical Specification Change Request No. 43, Amendment 1

Enclosed are three signed originals (sixty conformed copies sent separately) of Technical Specification Change Request No. 43, Amendment 1, requesting amendment to Appendix A of Operating License No. DPR-50. As a part of this request, proposed replacement pages for Appendix A are enclosed.

Also enclosed is one signed copy of Certificate of Service for proposed Technical Specification Change Request No. 43, Amendment 1, to the chief executives of the township and county in which the facility is located.

As requested by your letter of December 14, 1976, following please find a listing of our justifications for differences between this proposed change request and the model technical specifications submitted with your letter of September 14, 1976.

a. Reference Model T.S. 3.4.5.2 & 4.4.5.6

A steam generator water level limitation requirement is not proposed. Steam generator water level serves no function in monitoring tube degradation. The model technical specification for this requirement, "The steam generator water level limits are consistent with the initial assumptions in the FSAR", does not apply to TMI-1 since no such assumptions were made in the TMI-1 FSAR.

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b. Reference Model T.S. No. 3.4.5.1 & 2 - Action a.

The T_{avg} above which the reactor coolant system (RCS) cannot be heated unless all inoperable steam generators have been restored to the OPERABLE status (TMI-1 TS 3.1.1.2), was changed to 250° F. This change is needed since TS 3.1.1.2 correlates with TS 3.4. The main basis for TS 3.4 rests on the fact that at TMI-1 normal decay heat removal is by the steam generator with the steam dump to the condenser when system temperature is above 250° F and by the decay heat removal system when system temperature is below 250° F.

c. Reference Model T.S. No. 4.4.5.2

A 1½% sample size is proposed. The proposed sample size, inspection results categories, etc., are based on ASME Code Section XI, Winter 1975 Addenda. A 1½% sample size is suggested by the ASME Code on Table IWB-2500, Category B-Q. We feel that the ASME Code Section XI is an industry accepted standard which has been accepted by the USNRC on many occasions. We do not see any reason why the submitted model technical specification should differ extensively with the ASME Code and, in some cases, even with USNRC Regulatory Guide 1.83 (inspection results categories). We are, therefore, requesting a reasonable justification to support these differences if total compliance to the submitted model technical specifications should be required.

d. Reference Model T.S. No. 4.4.5.2.a

This requirement is being deleted. Possible generic problems related to the steam generators should be handled on a case basis in cooperation with the NRC but should not be part of Technical Specifications. The NRC Office of Inspection and Enforcement IE Bulletins/Circulars Program has successfully handled these problems in the past and we do not see any reasons why it should be handled differently in this case.

e. Reference Model T.S. No. 4.4.5.2.b & c

The proposed requirements are consistent with ASME Section XI, Winter 1975 Addenda, IWB-2430 and Table IWB-2500-Category BQ. As referenced in "c" above, we feel that a justification to support the model technical specification and its differences from ASME Code Section XI and USNRC Regulatory Guide 1.83 is necessary if total compliance should be required.

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f. Reference Model T.S No. 4.4.5.3.b

The proposed criteria for acceptability of a forty-month inspection interval are consistent with the ASME Code Section XI IWB-2420 (d). As referenced in "c" and "e" above, a reasonable justification should be provided if total compliance is required.

g. Reference Model T.S. Table 4.4-2

The proposed Table 4.18.2 differs from the model technical specification due to the use of ASME Code Section XI as the basis for our inspection results categories.

Sincerely,

R. C. Arnold
Vice President

RCA:JMC:eg

Enclosures: (1) Technical Specification Change Request No. 43, Am. 1

(2) Certificate of Service of Technical Specification Change Request No. 43, Amendment 1

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