Netropelitan Edison Conteny	DATE OF DOCUMENT:	DATE RECEIV	ED	No. 1178	
looding, Ponneylvania 19603 I.G. Miller	LTR. MEMO: REPORT: OTHER				
Dr. Peter A. Morris	ORIG.: CC: OTHER: 1 Signed & 3 cys con'f				
	ACTION NECESSARY	CONCURREN		DATE ANSWERED:	
CLASSIF: POST OFFICE D REG. NO:	FILE CODE: 50-289				
DESCRIPTION: (Must Be Unclassified) Ltr re our 9-16-70 ltrltr providing addl info on requirements of INKE-279 & preposed General Design Criteria	REFERRED TO	DATE	REC	EIVED BY	DATE
	Long w/4 cys for	12-2	29-70		
	DISTRIBUTION	:			
ENCLOSURES:	ABC FDR		Rosen Collins(2)	
	OGC-Rm-F-506 Compliance(2		D. Thomp	son shlin)	
	Bube/Wilson Boyd		MEIC (Buchanan)		
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METROPOLITAN EDISON COMPANY

P. O. Box 542 Reading, Pennsylvania 19603

JOHN G. MILLER Vice President and Chief Engineer

December 21, 1970

Dr. Peter A. Morris, Director Division of Reactor Licensing U. S. Atomic Energy Commission Washington, D. C. 20545

> Subject: Three Mile Island Nuclear Station Unit No. 1 Docket 50-289

Dear Dr. Morris:

In reference to question 7.1.3 contained in your letter of September 16, 1970, we stated in revised pages to the FSAR filed in Amendment 15, dated December 15, 1970, that the reactor protection system is designed to meet all the requirements of IEEE-279 and the commissions proposed General Design Criteria. In our opinion, IEEE-279 does not apply to the RC flow tubes.

The flow tubes are an integral part of the Reactor Coolant outlet piping, one tube in each Reactor Coolant loop and are not redundant. The Delta-p output from each tube is measured by redundant Delta-p instruments. A failure analysis of this arrangement has established its acceptability. The analysis considered all possible failure modes and common mode events which could conceivably deprive the protection system of needed information. No credible failure or common failure mode was discovered which could not be detected in the on-line operation of the plant.

Since no failure can initiate a need for protection system action, or go undetected, the system is acceptable.



Very truly yours,

J. G. Miller

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