

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER & LIGHT COMPANY

AND

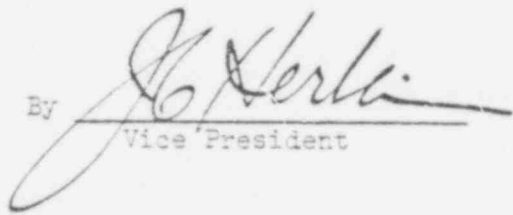
PENNSYLVANIA ELECTRIC COMPANY
THREE MILE ISLAND NUCLEAR STATION UNIT 2

Operating License No. DPR-73
Docket No. 50-320
Technical Specification Change Request No. 003

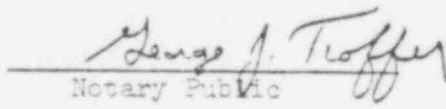
This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-73 for Three Mile Island Nuclear Station Unit 2. As a part of this request, proposed replacement pages for Appendix A are also included.

METROPOLITAN EDISON COMPANY

By


Vice President

Sworn and subscribed to me this 11th day of April, 1978.


Notary Public

GEORGE J. TROFFER
Notary Public, Franklin, Berks Co.
My Commission Expires Jan. 22, 1982

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POOR ORIGINAL

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

Technical Specification Change Request No. 003

The licensee requests that the attached changed pages replace pages 3/4 7-33, 3/4 7-35, 3/4 7-39, and B 3/4 7-6 of the existing Technical Specifications.

Reason for Change Request

These changes have been requested by the TMI-2 Operating Staff, and would allow a "patrolling" type of fire watch to be established rather than a continuous fire watch, as the specifications now require, for those times when fire suppression systems are not operable. This patrolling fire watch would allow those areas for which the fire suppression systems are inoperable to be monitored on a regular basis, and would also optimize the use of station man-power resources, and thus minimize diversion of man-power resources which could be more effectively used in other activities.

Safety Analysis Justifying Requested Change:

Section 3.3.3.8 of the current TMI-2 Technical Specifications indicates that whenever fire detection instrumentation is not operable a fire watch patrol shall be established to inspect the zone once per hour. Since it is obvious that both fire detection instrumentation and fire suppression systems are equally necessary to extinguish a fire, it is reasonable to provide the same means of "backup protection" for each. Thus, since it has been found acceptable to provide a "patrolling" fire watch for situations when fire detectors are inoperable it also is acceptable to provide a "patrolling" fire watch for situations when fire suppression systems are inoperable. Because a "patrolling" fire watch has been found appropriate as "backup" protection for inoperable fire detection instrumentation the proposed changes do not represent an unreviewed safety question.

POOR ORIGINAL

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PLANT SYSTEMS

HALON SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.10.3 The following Halon systems shall be OPERABLE with the storage tanks having at least 95% of full charge weight and 90% of full charge pressure (corrected to 70°F).

- a. Cable Room and Transformer Room - Control Building 305' elevation.
- b. Air Intake Tunnel (4 Zones)

APPLICABILITY: Whenever equipment in the Halon protected areas is required to be OPERABLE.

ACTION:

- a. With one or more of the above required Halon systems inoperable, establish a patrolling fire watch¹ with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.10.3.1 The Cable Room and Transformer Room Halon system shall be demonstrated OPERABLE:

- a. At least once per 6 months by verifying each Halon storage tank weight and pressure.
- b. At least once per 18 months by:
 1. Verifying the system, including associated ventilation dampers, actuates manually and automatically upon receipt of a simulated test signal, and

¹ Except in the air intake tunnel where no patrolling fire watch is required.

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*To inspect the zone with the inoperable halon system at least once per hour.
THREE MILE ISLAND - UNIT 2

1/4 7-15
DOOR OPERABLE

PLANT SYSTEMS

PENETRATION FIRE BARRIERS

LIMITING CONDITIONS FOR OPERATION

3.7.11 All penetration fire barriers protecting safety related areas shall be functional.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above required penetration fire barriers non-functional, establish a patrolling fire watch* on at least one side of the affected penetration within 1 hour.
- b. The provisions of 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.11 The above required penetration fire barriers shall be verified to be functional:

- a. At least once per 18 months by a visual inspection.
- b. Prior to returning a penetration fire barrier to functional status following repairs or maintenance by performance of a visual inspection of the affected penetration fire barrier(s).

*To inspect the zone with the non-functional penetration fire barriers at least once per hour.

PLANT SYSTEMS

BASES

3/4.7.9 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

3/4.7.10 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, Halon and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program. Any two of the four main fire pumps provide combined capacity greater than 3575 gpm.

In the event that portions of the fire suppression systems are inoperable, alternate backup fire fighting equipment is required to be made available in the affected areas until the affected equipment can be restored to service.

In the event that the fire suppression water system becomes inoperable, immediate corrective measures must be taken since this system provides the major fire suppression capability of the plant. The requirement for a Special Report to the Commission provides for timely evaluation of the acceptability of the corrective measures to provide adequate fire suppression capability for the continued operation of the nuclear plant.

3/4.7.11 FIRE BARRIER PENETRATION SEALS

The functional integrity of the fire barrier penetration seals ensures that fires will be confined or adequately retarded from spreading to Adjacent portions of the facility. This design feature minimizes the possibility of a single fire rapidly involving several areas of the facility prior to detection and extinguishment. The fire barrier penetration seals are a positive element in the facility fire protection program and are subject to periodic inspections.

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During periods of time when the seals are not functional, a patrolling fire watch* is required to be maintained in the vicinity of the affected seal until the seal is restored to functional status.

*To inspect the zone with the non-functional penetration seals at least once per hour.

PLANT SYSTEMS

DELUGE/SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.10.2 The Deluge and/or Sprinkler Systems located in the following areas shall be OPERABLE:

- a. Diesel Generator Fuel Oil Tanks
- b. Diesel Generator Building Air Intake
- c. Air Intake Tunnel (Deluge - 2 of the 3 zones)
- d. Hydrogen Purge Exhaust Filter AH-F-34
- e. Reactor Building Purge Exhaust Filters AH-F-31A/B
- f. Control Room Bypass Filter AH-F-5
- g. Diesel Generators Rooms
- h. Fuel Handling Building Exhaust Filter AH-F-10A/B
- j. Waste gas disposal filter WDG-F-1

APPLICABILITY: Whenever equipment in the deluge/sprinkler protected areas is required to be OPERABLE.

ACTION:

- a. With one or more of the above required deluge and/or sprinkler systems inoperable, establish a patrolling fire watch¹ with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

¹ Except in the air intake tunnel where no patrolling fire watch is required.

*To inspect the zone with the inoperable deluge/sprinkler system at least once per hour.