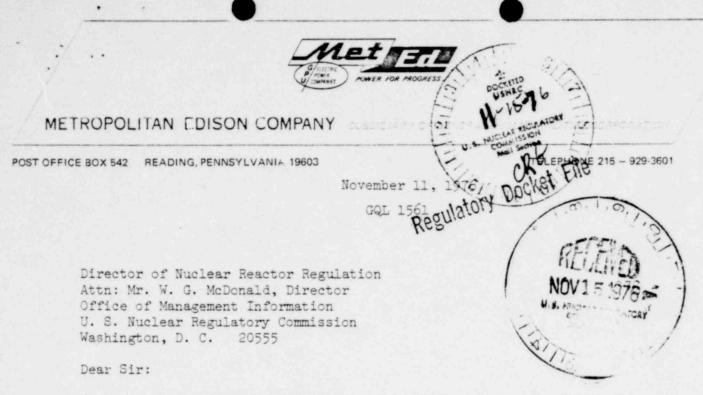
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Mr. W. G. McDonald		FROM: Metropolican Edison Company Reading, Pa. Mr. Robert C. Arnold		DATE OF DOCUMENT 11/11/76 DATE RECEIVED 11/15/76
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Enclosed please find the October Operating Status Report for Three Mile Island Nuclear Station Unit 1 (TMI-1).

Recently, it was brought to our attention by the USNRC Office of Inspection & Enforcement, Region 1, that our TMI-1 Monthly Operating Status Report forms differed to some extent from those proposed by USNRC Regulatory Guide 1.16 Revision 4. Besides slight editorial differences, the main dissimilarities included:

- a. Reg. Guide 1.16, Rev. 4 recommends the submittal of reactor and unit service factors in addition to the reactor and unit availability factors that were being reported by Met-Ed.
- b. In addition to plant shutdowns, significant dips in average power levels are recommended to be reported.
- c. The submission of the design electrical rating is suggested.
- d. A unit capacity factor based on the plant's design electrical rating is recommended to be submitted in addition to the capacity factor based on the maximum dependable capacity.

Starting with this report, Met-Ed is submitting the information referenced in a and b above. TMI-1 was designed to operate at core power levels up to 2535 MWt which, when the 16 MWt contribution from the reactor coolant pumps is included, <u>gross</u> electrical outputs in the range of approximately 830 to 870 MWe can be expected, depending on weather conditions. The design electrical rating is described as "the nominal <u>net</u> electrical output of the unit specified by the utility and used for the purpose of the plant design."

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Mr. W. G. McDonald, Director

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The NRC, in the absence of Met-Ed submittal of this information in the monthly operating status report, has been using a value of approximately 819 MWe (net) as TMI-1 design electrical rating. This is the result of subtracting 52 MWe (to account for plant service load) from a 871 MWe (gross) value referenced on Section 1, page 1-1 of the TMI-1 FSAR. With this data the NRC has been calculating the TMI-1 capacity factors based on the design electrical rating. However, this is not completely correct since (a) a 819 MWe (net) value was not used as the basis for TMI-1 design, (nor was any other generator output; gross or net), (b) the plant gross output depends on prevailing ambient conditions and, (c) the plant service load is not a constant value, neither over the short term nor the long term.

- 2 -

Therefore, in order to be responsive to the NRC concerns referenced in c and d above, we would need a definition of design electrical rating which define how to treat specifically:

- What condenser ∆T or meteorological conditions shall be assumed to calculate the plant gross output;
- 2) What plant service load shall be assumed; or
- 3) Shall we use the plant's summer rating, winter rating, or an average of the two?

In order to assure a meaningful and consistent set of NRC data, I would suggest that other utilities be contacted for concurrence with your final definition.

With this information we will then be able to more closely follow the guidelines proposed by Reg. Guide 1.16, Rev.

Sincerely.

Robert C. Arnold Vice President

RCA:JMC:rk Enclosure

cc: Mr. J. P. O'Reilly, Director Office of Inspection and Enforcement, Region 1 U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, Pennsylvania 19406

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