# METROPOLITAN EDISON COMPANY JERSEY CENTRAL POWER & LIGHT COMPANY

AND

#### PENNSYLVANIA ELFCTRIC COMPANY

#### THREE MILE ISLAND NUCLEAR STATION UNIT 1

Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request No. 22 Amendment No. 1

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-50 for Three Mile Island Nuclear Station Unit 1. As a part of this request, proposed replacement pages for Appendix A are also included.

METROPOLITAN EDISON COMPANY

Vice President-Generation

Sworn and subscribed to me this 15th

\_\_\_ day of

, 1976.

Notary Public

RITA M. POWERS

Notary Public, Muhlenberg Twp., Berks Co.
My Commission Expires September 30, 1978

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Metropolitan Edison Co. (Met-Ed)
Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289

# TECHNICAL SPECIFICATION CHANGE REQUEST NO. 22 AMENDMENT NO. 1

The licensee requests that the attached changed pages replace page 4-33 of our original request dated October 29, 1975.

## REASON FOR CHANGE

Appendix J to 10 CFR 50 requires type "C" tests to be conducted for certain containment isolation valves. The leakages of valves served by a pressurized seal system, such as our Fluid Block System, may be excluded from the Acceptance Criterion of 0.60 La provided that the fluid inventory of the Fluid Flock System is shown to be sufficient to assure sealing for at least 30 days at 1.10 Pa. Our present Technical Specifications and previously proposed Appendix J related Technical Specification Change Request (October 29, 1975) would permit testing in only the above manner. Appendix J however, would allow testing of each valve served by the Fluid Block System using nitrogen provided that the leakages of these valves are included when meeting the Acceptance Criterion of 0.60 La.

Since only extremely small water leakages are tolerable given the small capacity of the Fluid Block Tanks, we have been unable to demonstrate that there is a 30 day supply of seal water at 1.10 Pa. We are able to reduce the from-containment air leakage of these valves to near zero and yet have sufficient seal water loss to prevent meeting the seal water acceptance criterion. Efforts to date have not succeeded in assuring a 30 day supply of seal water. This change to Technical Specifications is necessary to permit taking advantage of all of the options allowed by Appendix J.

### SAFETY ANALYSIS JUSTIFYING CHANGE

Justification for all changes, except those marked by double marginal bars on the attached changed pages, was provided by our original request as supplemented by our letter of September 17, 1975. Those changes requested by this amendment to our previous request are completely in agreement with the requirements of 10 CFR 50 Appendix J and do not represent an unreviewed safety question.

- 9. Drain Valves (WDG-V3, WDL-V303 and WDL-V534)
- c. The following isolation valves will be tested by either testing the Fluid Block System or by measuring the local leak rate for all of those valves using a type "C" test as defined by 10 CFR 50, Appendix J.
  - 1. Nuclear Service Closed Cooling Water (NS-Vb NS-V15)
  - 2. Intermediate Cooling Water (IC-V3, V4 and V6)
  - 3. Spent Fuel Cooling (SF-V23)
  - 4. Make-up and Purification (MU-V3 and MU-V26)
  - 5. Reclaimed Water (CA-V189)
  - 6. Sample Valves (CA-V5A&B and CA-V2)
  - 7. Drain Valves (WDL-V304, WDG-V4 and WDL-V535)
- d. The following isolation valves or blank flanges will be tested by testing the Penetration Pressurization System.
  - 1. Instrument Air (IA-V6 and IA-V20)
  - 2. Service Air (SA-V2 and SA-V3)
  - 3. Leak rate system (LR-V1, 2, 3, 4, 5, 6, 10, and 49)
    Blank flanges on Penetrations 414, 415, 416
  - 4. Incore Inst. Transfer Tube Blank Flange on Penetration 241

4.4.1.2.2 Conduct of Tests

- a. Local leak rate tests shall be performed pneumatically at a pressure of not less than  $P_a$ , with the following exception: The access hatch door seal test shall normally be performed at 10 psig and the test every six months specified in 4.4.1.2.5.b shall be performed at a pressure not less than  $P_a$ .
- b. Acceptable methods of testing are halogen gas detection, pressure decay, pneumatic flow measurement or equivalent.
- c. The pressure for a valve test shall be applied in the same direction as that when the valve would be required to perform its safety function unless it can be determined that the direction will provide equivalent or more conservative results.
- d. Valves to be tested shall be closed by normal operation and without any preliminary exercising or adjustments.

## 4.4.1.2.3 Acceptance Criteria

The combined leakage from all items listed in 4.4.1.2.1, except leakage from those valves or devices sealed by the Fluid Block System\* or Penetration Pressurization System, shall not exceed .6 La (the maximum allowable leakage rate at Pa).

\*When credit is taken for the use of type "C" testing for the values served by the Fluid Block System, their air/nitrogen leakage shall be included.

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

DOCKET NO. 50-289 LICENSE NO. DPR-50

METROPOLITAN EDISON COMPANY

IN THE MATTER OF

This is to certify that a copy of Technical Specification Change Request No. 22, Amendment No. 1 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 1, dated April 15, 1976 and filed with the U. S. Nuclear Regulatory Commission on April 15, 1976. has this 15th day of April 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, Vice-Chairman Board of Supervisors of Londonderry Township 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

President-Generation