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February 4, 1980
TLL 039

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 I (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Fire Protection

This letter and attachment is in response to your letter of September 11, 1979, and should be reviewed along with our previous submittal of January 8, 1980, GQL 1558.

The attachment contains our responses to items not previously answered, specifically, items 8 f, h, i, j, k, and l.

Sincerely,

J. G. Herbein
Vice President
Nuclear Operations

JGH:DGM:hah

Attachment

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(f) Demonstrate that licensee procedure(s) have been developed which describe the tasks to be performed to effect the shutdown method. A summary of these procedures should be reviewed by the staff.

Response:

The procedure(s) that will be developed for shutdown will describe all tasks which will be performed. The staff will be provided for review a summary of the procedure(s) to verify an acceptable shutdown method.

(h) Demonstrate that the manpower required to perform the shutdown functions using the procedures of (f) as well as to provide fire brigade members to fight the fire is available as required by the fire brigade technical specifications.

Response:

The technical specifications section 6.2.2.a states that there will be one (1) Shift Supervisor/Shift Foreman, two (2) Control Room Operators, two (2) Auxiliary Operators, and five (5) additional personnel for the fire brigade on-duty each shift. Credit for the number of personnel in the control room will be given to satisfy the manning requirements for the remote shutdown. When the control room is disabled, the Shift Supervisor/Foreman, Control Room Operators, and other qualified personnel within the plant will follow procedure(s) for the remote shutdown and proceed to the remote shutdown panel. The fire brigade along with a more professional, highly trained, and equipped fire department will respond to the fire scene. At this time we are considering establishing a site fire department to supplement the fire brigade. The fire brigade and the possible site fire department under the direction of the duty Fire Chief will fight the fire and advise the Shift Supervisor/Foreman. With the obtained advice, the Shift Supervisor/Foreman will inform the Fire Chief as to the actions to take. The presently established fire brigade will be responsible to assist the fire department, or if needed, be used to assist in the remote shutdown.

(i) Demonstrate that adequate acceptance tests are performed. These should verify that: equipment operates from the local control station when the transfer or isolation switch is placed in the "Local" position and that the equipment cannot be operated from the control room; and that equipment operates from the control room but cannot be operated at the local control station when the transfer or isolation switch is in the remote position.

Response:

Acceptance tests will be conducted to demonstrate the ability to test the transfer or isolation switch. The switch must perform as stated in (i).

(j) Technical Specifications of the surveillance requirements and limiting conditions for operation for that equipment not already covered by existing Tech Specs. For example, if new isolation and control switches are added to a service water system, the existing Tech. Spec. surveillance requirements on the service water system should add a statement similar to the following:

> "Every third pump test should also verify that the pump starts from the alternate shutdown station after moving all service water system isolation switches to the local control position."

Response:

All equipment not covered by existing Technical Specification surveillance requirements will be encorporated into the surveillance testing program and Technical Specification changes will be submitted.

(k) Demonstrate that the systems available are adequate to perform the necessary shutdown functions. The functions required should be based on previous analyses, if possible (e.g., in the FSAR), such as a loss of normal a.c. power or shutdown on a Group I isolation (BWR). The equipment required for the alternate capability should be the same or equivalent to that relied on in the above analysis.

Response:

The systems available to accomplish the alternate shutdown are the systems as described in TMI-I Emergency Procedure 1202-37 Cooldown from Outside Control Room and the Plant Shutdown Procedure 1102-10.

From the procedures, a list of components necessary to achieve cold shutdown was prepared. This list was reviewed by plant operating staff, plant technical staff and the Met-Ed/GPUSC Generation Engineering staff for completeness. When all reviewers concluded the list to be complete, the alternate shutdown capability design was started.

The original analysis did not consider loss of off-site power; but a design is now being implemented to provide emergency on-site power.

(l) Demonstrate that repair procedures for cold shutdown systems are developed and material for repairs is maintained on site.

Response:

Repair procedures for cold shutdown systems will be developed for frequently required work. Less frequent repairs and major work will be covered by procedures developed specifically for

that work when required. All procedures used on systems required for cold shutdown will receive appropriate safety reviews by plant personnel prior to use. A spare parts inventory will be incorporated into TMI warehousing to ensure availability when required.