

Technical Specification Change Request No. 90

The licensee requests that the attached changed page temporarily replace page 4-59 of the existing TMI-1 Technical Specifications. Upon completion of Cycle 5 this change would be deleted and page 4-59 would reflect Amendment 42 dated 8/16/78.

Reason for Change

The prolonged Unit 1 outage will require that surveillances done on a "refueling period" basis be reperformed before the Cycle 6 refueling. The Tech. Spec. definition (T.S. 1.2.8) of a "Refueling Interval" limits the interval to no more than 24 months without NRC approval, and it appears unlikely that the Cycle 6 Refueling will occur by February 1981.

Met-Ed requests that the NRC grant an extension on the surveillance interval for specification 4.16.1. Removal of R. V. Head does include some risk, and there are personnel safety concerns with any major lift and the personnel radiation exposures to perform these evolutions are significant. From the standpoint of public health and safety there is an increased probability of damage to irradiated fuel whenever the R. V. Head is not in place and while it is being moved.

Safety Analysis Justifying Change

Since June 1974 when initial criticality was achieved the eight internal vent valves have each been tested four times over the last five years for a total of 32 functional tests without a single failure.

Due to concerns about vent valves wear at other B&W Units one vent valve was removed and given a detailed examination during the Cycle 5 refueling. No noticeable wear was found which verified the excellent performance of the vent valves in Unit 1.

The present mode of operation, which will continue until Cycle 5 Startup, places the valves in a favorable environment. The low RC flow rates, tight chemistry controls, and absence of power operation will cause little, if any wear or crud deposition. The valves will not be subjected to the major cause of wear, high RC flow, for a longer than usual period since this depends on the Cycle length (Cycle 5 is 265 + 15 EFPD) which has not changed. The effect of the prolonged shutdown period combined with a normal cycle length should certainly not be significantly greater than that resulting from the first cycle of operation which was 467.4 EFPD of operation over some 20 calendar months.

License Amendment Fee (10 CFR 170.22)

Because this change involves a single safety issue, and is therefore a Class III Amendment, enclosed is the proper remittance of \$4,000.00.

4.16 REACTOR INTERNALS VENT VALVES SURVEILLANCE

Applicability

Applies to Reactor Internals Vent Valves.

Objective

To verify that no reactor internals vent valve is stuck in the open position and that each valve continues to exhibit freedom of movement.

Specification

<u>Item</u>	<u>Test</u>	<u>Frequency</u>
4.16.1 Reactor Internals Vent Valves	Demonstrate Operability By: a. Conducting a remote visual inspection of visually accessible surfaces of the valve body and disc sealing faces and evaluating any observed surface irregularities. b. Verifying that the valve is not stuck in an open position, and c. Verifying through manual actuation that the valve is fully open with a force of ≤ 400 lbs (applied vertically upward).	Each Refueling Shutdown *

Bases

Verifying vent valve freedom of movement insures that coolant flow does not bypass the core through reactor internals vent valves during operation and therefore insures the conservatism of Core Protection Safety limits as delineated in figures 2.1-1 and 2.1-3, and the flux/flow trip setpoint.

* No surveillance required between the Cycle 5 refueling surveillance and the completion of the 5th fuel cycle.