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March 5, 1979  
GQL 0311

Director of Nuclear Reactor Regulations  
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 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Fire Protection Program

Amendment No. 44 to Facility Operating License No. DPR-50 issued September 19, 1978, added a license condition relating to the completion of facility modifications for fire protection. These modifications are described in the Fire Protection Safety Evaluation Report (FPSER). Table 3.1 of the FPSER specifies the implementation dates of the facility modifications for fire protection (as mutually agreed upon between NRC and Met-Ed), except the implementation dates for Items 3.1.4, 3.1.8, 3.1.11, and 3.1.21, which were submitted on September 29, 1978 and are awaiting NRC review and approval.

Many of the modifications require that the plant be shut down for all or part of their implementation, either to allow work on equipment that normally must be kept running during operation or to keep personnel exposures to a minimum. Schedules were generated under the assumption that all non-outage work would be accomplished prior to refueling, with only outage-dependent work remaining when the refueling outage commenced, and no work remaining at the end of the outage.

When Amendment No. 44 was issued, the anticipated TMI-1 1979 refueling outage was scheduled to commence on March 10, 1979, and last for six weeks (see the September Operating Report for TMI-1, GQL 1644 dated October 13, 1978). However, due to very successful operation of TMI-1 Cycle 4 (approximate Cycle 4 capacity factor of 94%), the refueling outage had to be rescheduled to commence on February 17, 1979 (see the November Operating Report for TMI-1, GQL 2001 dated December 13, 1978). In addition, it is currently anticipated that the duration of the outage will be four weeks<sup>1</sup> rather than six weeks. The overall effect is that the implementation schedule was tightened by five weeks, although the scope of the work required did not decrease.

Nonetheless, Met-Ed has expedited implementation to the extent possible and should be able to complete the required modifications with the exception of FPSER Table 3.1 Items 3.1.9, and 3.1.15, Fire Barrier Penetrations and Electrical Cable Penetration Seals, respectively.

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<sup>1</sup>As of this date, generator circuit breaker closure (end of outage) is targeted for March 21, 1979.

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R. W. Reid, Chief

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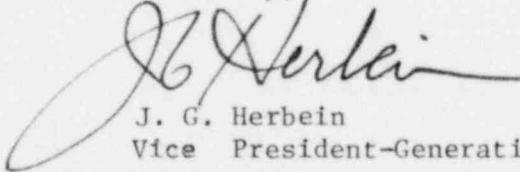
With regard to Items 3.1.9 and 3.1.15, the contractor is presently working ten hours per day, seven days per week. On this schedule, the work should be completed by April 15, 1979. Met-Ed has investigated further expediting in terms of manpower and round-the-clock shifts. Increased manpower is not feasible because of the physical concentration of the seals to be installed. If round-the-clock shifts could be instituted, it would result in lower productivity at an estimated additional cost of \$175,000.

Therefore, Met-Ed is requesting that NRC review the circumstances surrounding the selection of "End of Refueling 1979" as an implementation date in light of Met-Ed's intent to have completed the scheduled implementation based on a six-week refueling outage, commencing on March 10, 1979. Met-Ed is further requesting that the results of NRC's review support April 15, 1979 as an acceptable implementation date for those items currently scheduled for completion by the end of refueling 1979.

It should be noted that Met-Ed is making every effort to fully comply with the Branch Technical Position 9.5-1 Appendix A requirements, which in some cases has identified a larger scope of modifications than that identified during NRC's inspection of TMI-1. In asserting this effort, Met-Ed believes that the fire protection program, when fully implemented, will provide assurance that a fire will not jeopardize the continued safe operation or safe shutdown of TMI-1.

In order that this issue be resolved prior to the anticipated TMI-1 Cycle 5 startup (March 14, 1979), Met-Ed requests that NRC review be completed prior to March 9, 1979.

Sincerely,



J. G. Herbein  
Vice President-Generation

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