

Metropolitan Edison Company Post Office Box 480 Middletown, Pennsylvania 17057 717 Stakkadati 948-8000

Writer's Direct Dial Number

February 28, 1980 TLL 044

TMI Support Attn: J. T. Collins, Deputy Director U. S. Nuclear Regulatory Commission c/o Three Mile Island Nuclear Station Middletown, Pa. 17057

Dear Sir:

Three Mile Island Nuclear Station, Units I & II (TMI-1 & TMI-2) Operating License Nos. DPR-50 and DPR-73 Docket Nos. 50-289 and 50-320 Station Liquid Waste Storage Capacity

In response to Mr. Collins' letter (NRC/TMI 80-11) dated January 21, 1980, we have developed an alternate proposal with regard to maintaining contingency radwaste storage. It is proposed that rather than maintaining contingency storage exclusively in TMI-I, that appropriate contingency storage would be maintained at the station. Specifically, 160,000 gallons of shielded storage, the equivalent of two reactor coolant bleed tanks, would be maintained in the stations combined facilities. This is consistent with the Commission's order of October 18, 1979 and subsequent discussions with your staff. This proposal would provide greater processing flexibility and would limit any interference on the start of construction of the submerged demineralizer caused by radwaste processing.

Establishment of a 160,000 gallon storage requirement for the station would allow TMI-I to use its bleed tanks as a path to transfer processed TMI-II BWST water to the TMI-I BWST. Use of the TMI-I tanks (or a portion of their capacity) will reduce the time required for the transfer from 4-5 months to 3 months or less. Any reduction of the time required for the transfer will result in a similar advance in the schedule for starting construction of the SDS and subsequent containment decontamination. The three processes possible for the transfer of the TMI-II BWST to TMI-I are described on the attachment to this letter together with the time period required for each option.

If you have any questions regarding this proposal, please contact R. J. McGoey (717-948-8334) or E. C. Fuhrer (717-948-8012) of my staff.

Metropolitan Edison Company is a Member of the General Public Utilities System

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Sincerely,

Signed J. G. Herbein

J. G. Hertein Vice President Nuclear Operations

JGH:ECF:hah

Attachment



PROCESS DESCRIPTIONS AND SCHEDULES

 The 360,000 gallons of borated water from the TMI-2 BWST would be processed by EPICOR I to meet applicable discharge criteria in preparation for discharge to the river via TMI-I. There would be no need to use the TMI-I bleed tank capacity. The process is expected to take 5 - 6 months because of the process flow rate/discharge flow rate limitations and the shared use of EPICOR I and the TMI-I WECST's.

Time required from the start of the TMI-2 BWST transfer to the start of SDS construction:

a.	Transfer TMI-2 BWST	4 to 5 months
b.	Transfer Spent Fuel Pool to TMI-2 BWST with boration	0.5 to 1 month
c.	Decon Spent Fuel Pool	0.25 months
	Total	4.75 to 6.25 months

2. The 360,000 gallons of borated water from the TMI-2 BWST would be processed by EPICOR I to remove sodium contamination and excess boric acid prior to being transferred to the TMI-I BWST. The transfer from EPICOR I to the BWST requires the use of a portion of a TMI-1 bleed tank to be used as a process path.

Time required from the start of the TMI-2 BWST transfer to the start of SDS construction:

a.	Transfer TMI-2 BWST	3 months
b.	Transfer Spent Fuel Pool to TMI-2 BWST with boration	0.5 to 1 month
c.	Decon Spent Fuel Pool	0.25 months
	Total	3.75 to 4.25 months

3. The 360,000 gallons of borated water from the TMI-2 BWST would be processed by the TMI-1 radwaste system to remove sodium contamination and excess boron prior to being transferred to the TMI-1 BWST. A portion of a TMI-1 bleed tank will be required to be used as a test tank to determine if the sodium clean-up was acceptable prior to transferring the water to the TMI-1 BWST.

Time required from the start of the TMI-2 BWST transfer to the start of SDS construction:

a.	Transfer TMI-2 BWST	1 month
b.	Transfer Spent Fuel Pool to TMI-1 BWST with boration	0.5 to 1 month
с.	Decon Spent Fuel Pool	0.25 month
	Total	1.75 to 2.25 months