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Writer's Direct Dial Number

April 28, 1980
TLL 186

TMI Program Office
Attn: B. Snyder, Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit II (TMI-2)
Docket No. 50-320
Operating License No. DPR-73
Technical Specification Change Request No. 22

Enclosed are three signed originals (sixty conformed copies sent separately) of Technical Specification Change Request No. 22 requesting amendment to Appendix A of Operating License No. DPR-73.

Also enclosed is one signed copy of Certificate of Service for proposed Technical Specification Change No. 22 to the chief executives of the township and county in which the facility is located.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. C. Arnold".

R. C. Arnold
Sr. Vice President

RCA:lh

- Enclosures:
- 1) Technical Specification Change Request No. 22
 - 2) Certificate of Service for Technical Specification Change Request No. 22
 - 3) Check No. 013181

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER & LIGHT COMPANY

AND

PENNSYLVANIA ELECTRIC COMPANY
THREE MILE ISLAND NUCLEAR STATION UNIT II

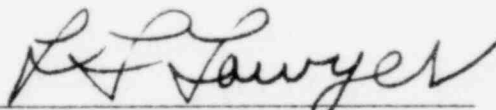
Operating License No. DPR-73
Docket No. 50-320
Technical Specification Change Request No. 22

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-73 for Three Mile Island Nuclear Station Unit 2. As a part of this request, proposed replacement pages for Appendix A are also included.

METROPOLITAN EDISON COMPANY

By 
Sr. Vice President

Sworn and subscribed to me this 28 day of April, 1980.


Notary Public

NOTARY PUBLIC
Reading Berks County, Pa.
My Commission Expires Nov. 19, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

DOCKET NO. 50-320
LICENSE NO. DPR-73

METROPOLITAN EDISON COMPANY

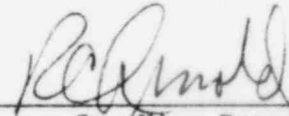
This is to certify that a copy of Technical Specification Change Request No. 22 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 2, has, on the date given below, been filed with the U.S. Nuclear Regulatory Commission and been served on the chief executives of Londonderry Township, Dauphin County, Pennsylvania and Dauphin County, Pennsylvania by deposit in the United States mail, addressed as follows:

Mr. Donald Hoover, Chairman
Board of Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, Pennsylvania 17057

Mr. John E. Minnich, Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Court House
Harrisburg, Pennsylvania 17120

METROPOLITAN EDISON COMPANY

By



Sr. Vice President

Three Mile Island Nuclear Station, Unit II (TMI-2)
Operating License No. DPR-73
Docket No. 50-320

Technical Specification Change Request No. 22

The licensee requests that the attached changed pages replace pages 3.8-1 to 3.8-3 of the TMI-II Recovery Technical Specifications.

Reason for Change Request

1. To remove the Balance of Plant (BOP) diesel generators and the 13.2 kv circuit from the Middletown Junction Substation from the Technical Specifications since those loads can now be accommodated by utilization of existing combustion turbines, transmission and transformation equipment and the TMI-II auxiliary transformers.
2. To allow adequate time for the performance of the annual preventive maintenance on the emergency diesels.

Justification

1. BOP Diesels/13.2 kv line.
 - a. The technical justification for the removal of the BOP diesels from the Technical Specifications was initially submitted in the Technical Evaluation Report (TER) dated March 4, 1980 (TLL 078). As a result of continued engineering evaluation, the technical justification was updated to reflect both the removal of the BOP diesels and the 13.2 kv line from the Technical Specifications. The revised Technical Evaluation Report (TER) was submitted March 28, 1980 (TLL 150).

2. Emergency Diesels

- a. Background

The TMI-II Technical Specifications required one class IE Diesel Generator operable during Mode 5 and 6. It was during this mode when annual preventive maintenance (and some low priority corrective maintenance) was performed. In fact, the technical specifications contained a surveillance requirement to perform such maintenance.

On February 15, 1980, the NRC Order was received implementing the new Recovery Technical Specifications.

The Recovery Technical Specification 3.8.1.1.b now requires both diesels to be operable. The associated action statement requires the diesels to be operable within 72 hours, which is consistent with Standard Technical Specification criteria.

- b. Discussion

The requirement to have both operable Class IE diesels is under-

standably based upon the need to ensure sufficient power will be available to supply the safety related equipment required to maintain the unit in stable conditions during recovery from the March 28, 1979 accident.

Likewise, in order to ensure the continued operability and reliability of the diesels, it is imperative that an appropriate preventive and corrective maintenance program be in place.

An annual maintenance outage is consequently required to perform preventive and corrective maintenance with the assistance of a factory representative. The maintenance items include, but are not limited to the following:

- . Pull all injectors, test, repair and replace as necessary.
- . Remove exhaust manifolds, clean and inspect them.
- . Remove all bearing inspection covers and check all clearances.
- . Inspect and adjust timing chain and gears.
- . Inspect and check clearance on the cam rollers.
- . Verify crankshaft lead angle adjustment.
- . Remove covers and inspect the blower.
- . Inspect the fuel pump drive.
- . Check all auxiliary pump seals.
- . Inspect air start distributor.
- . Visually check all rings, cylinder, air pots and attendant mechanisms.
- . Change oil if required (some maintenance items require this).
- . Inspect the vertical drive shaft.
- . Corrective maintenance items such as:
 - a) Repair numerous small oil and fuel leaks which developed during operation (typically these are minor, but if not corrected will develop into potential fire hazards and/or diesel failure).
 - b) Repair valve leaks.
 - c) Perform miscellaneous operations which require the diesel to be out of service.
 - d) Electrical related maintenance.

The time required to perform the minimum inspections could possibly be done within a 72 hour time frame, but when the corrective items and invariable problems discovered during the inspection are added to the maintenance effort, then the time required is 5 to 7 days. For example, if bearing wear is greater than desirable for long term operation, additional time is required to make the replacement. Even if all the spares are on hand, time is needed to draw parts out of the controlled stores system, remove the bearing, fit up, and install the new assembly. This could typically take an additional day or two to accomplish in the quality manner required.

Typical problems discovered are as follows:

- . Leaking gaskets
- . Worn injectors
- . Oil leaks
- . Worn bearings
- . Oil cleanup which requires partial disassembly to gain entry into normally inaccessible areas.
- . Out of tolerance relays or instruments
- . Valve leaks

The problems are typically those which do not prevent proper diesel operation; however, they could, if left uncorrected, render the diesel inoperable in the future.

In the past, annual maintenance outages have, with few exceptions, taken at least 5 to 7 days to accomplish, based upon Unit I and current Unit II experience.

Amendment Classification (10 CFR 170.22)

Because the proposed changes involve a single safety issue which does not involve a significant hazards consideration, it constitutes a Class III License Amendment (as defined by 10 CFR 170.22). Therefore, enclosed please find a check in the amount of \$4,000.00.