



Metropolitan Edison Company
Post Office Box 480
Middletown, Pennsylvania 17057
717 944-4041

Writer's Direct Dial Number

August 26, 1980
TLL 390

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

Dear Sir:

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

Our letter to you, TLL 129, dated March 24, 1980, provided information regarding our intention to relocate the EPICOR-I System to the Unit 2 side of the fence that separates TMI-1 and TMI-2. Furthermore, we specified that the move and the subsequent preoperational testing would be completed in June.

As a result of the ongoing engineering evaluation process and the continually changing conditions that are presented during the recovery of TMI-2 it no longer appears that relocation of EPICOR-I to TMI-2 is appropriate. Several primary factors contribute to this decision. They are:

1. EPICOR-I usage in recent months has been dedicated (approximately 75% of the time) to the processing of TMI-1 generated wastewater.
2. Only small amounts of low-level TMI-2 generated wastewater (non-accident water) is being treated by the EPICOR-I System.

The EPICOR-I System is presently being operated by Unit 1 personnel in accordance with procedures approved in accordance with the TMI-1 Technical Specifications. Processing of TMI-2 non-accident water by the EPICOR-I System is performed in the same manner; by Unit 1 personnel under the supervision and management of the Unit 1 staff.

TMI-2 non-accident wastewater (that water generated as a result of pump seal leakage, etc.) is collected in WDL-T-11A and/or WDL-T-11B and is held up pending transfer. At the appropriate time this water is transferred to Unit 1, WDL-T-9, using the Contaminated Drain Pumps, WDL-P-15A and/or WDL-P-15B. This transfer operation is performed under the procedural control of a station procedure, since activities must be accomplished in both units to effect the transfer of the water. The procedure, Procedure No. 3104-4.7, has been submitted to the NRC for review and subsequent approval. NRC approval for use of this procedure was received on June 3, 1980.

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As a result of the NRC Order and Notice of Hearing, dated August 9, 1979, concerning the restart of the TMI-1 unit, we have been directed by the Commission to provide for physical separation of TMI-1 and TMI-2. Specifically, that direction reads,

"The licensee shall demonstrate that decontamination and/or restoration operations at TMI-2 will not affect safe operations at TMI-1. The licensee shall provide separation and/or isolation of TMI-1 and TMI-2 radioactive liquid transfer lines . . . "

As a direct result of the above-mentioned order, prior to restart of the TMI-1 unit, we intend to discontinue the transfer of non-accident TMI-2 wastewater for processing. Furthermore, these wastewaters will be collected in suitable tankage in TMI-2 for subsequent processing by TMI-2 liquid radwaste systems prior to disposition.

The primary purpose of this letter is:

1. To inform you that we do not intend to relocate EPICOR I to TMI-2.
2. To document that, in our opinion, NRC review of procedures has been adequate for the processing of TMI-2 non-accident generated wastewater by the EPICOR I System.
3. To notify you of our future intentions concerning the disposition of TMI-2 non-accident water.

Should you wish to discuss this matter further, please contact me.

Sincerely,

/s/ G. K. Hovey

G. K. Hovey
Director, TMI-2

GKH:LJL:dad

cc: Bernard J. Snyder