



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

Writer's Direct Dial Number

October 2, 1980  
TLL 500

Office of Nuclear Reactor Regulation  
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  
Status of SER Open Items

- Reference 1: T. M. Novak's letter to R. C. Arnold  
of August 11, 1980
- Reference 2: D. G. Eisenhut's letter of September 5,  
1980 to All OL and CP Plants

This letter is in response to your letter of September 4, 1980, which requested schedules for providing information concerning open items related to Order Item Nos. 1, 2, 4, 5 and 8. The enclosed table summarizes the remaining significant open items. As noted in the SER, some additional items will remain open awaiting completion of procedures, tests, or technical specifications. The status of these items is not addressed in this response.

For the Order Items mentioned above, there are thirteen open items that can be categorized in the following three groups:

- A. Items that have been conceptually described, and detailed information is needed only for confirmation. (Five items: 4, 8(2.1.4, 2.1.8.a, 2.1.8.b, and Add'l. 4). Several of these items are long-term implementation items. Schedules have been provided in the enclosed table.
- B. Items that are pending NRC action or review. (Four items: 8(2.1.3.a, 2.1.3.b, 2.1.9 and Long-Term 2). Item 2.1.3.a requires that an understanding of the NRC's continuing concerns be made available to the Licensee. The remaining three items are related to Inadequate Core Cooling, which are the subject of hearing testimony filed September 15, 1980 in support of our position.
- C. Items to be responded to by October 15, 1980. (Four items: 2(IEB 79-05B-1), 5, and 8(2.1.6.b and 2.1.7.a).

8010070 542

P

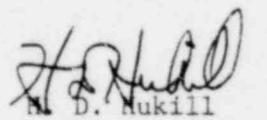
App'd  
11/11/80

With regard to Order Item No. 7, we expect to provide the majority of the information requested by Reference 1 on October 6, 1980. We note, however, that our financial position continues to be dependent on regulatory actions by state utility regulators, and that analysis of our financial position has been changing and can be expected to change further. It is, therefore, not likely that submittal of the requested information by October 6, 1980 will be sufficient to close this item. It is, for this reason that we have proposed that the issue of financial qualification be taken up as the last issue in the restart hearings. We will continue, as we have in the past, to provide financial updates as they are requested.

Although not the subject of your letter, there are additional open items in Order Item 3 (Emergency Planning). We received your letter of September 9, 1980 on September 23, 1980. This letter asks for responses to twenty-three additional questions on emergency planning issues. Since the SER was previously complete in this area, we do not anticipate delays in proceeding to hearing while these latest questions are being responded to. We will respond to these questions within the requested forty-five days from receipt. To our knowledge, we have responded to all questions regarding management structure. We are not aware of any management issues which require our response in order to proceed with the hearing activities associated with Order Item 6.

Finally, it should be noted that several of these items are still the subject of internal NRC criteria development as evidenced by Reference 2. This document presented new views and requirements on many of the items covered by Order Item 8, and modified the implementation schedule for many more of these items. To conclude that we have been unresponsive to firmly established requirements is therefore inappropriate since many of the requirements are not yet firmly established and continue to fluctuate. It would also be inappropriate to require as a condition for restart, implementation by TMI-1 of new views and requirements on a schedule different than other operating reactors. The regulatory criteria that should form the basis for TMI-1 Restart should be those underlying the August 9, 1979 Order so that judgements concerning the necessity for and sufficiency of the improvements made to TMI-1 for Restart can be made. With that basis, conclusions regarding TMI-1 operational safety and management have an identified frame of reference that is in keeping with the requirements for all operating reactors. Subsequent evolution of regulations can and should be the subject for review between the NRC staff and any licensee, but these efforts for TMI-1 should not be part of the considerations for restart.

Sincerely,



H. D. Nukill  
Director, TMI-1

HDH:EDW:hah

Enclosure

cc: J. T. Collins  
B. J. Snyder  
B. H. Grier  
D. DiIanni  
H. Silver

GROUP A, B, AND C SER OPEN ITEMS

<u>ORDER ITEM NO.</u>	<u>OPEN ITEM DESCRIPTION</u>	<u>STATUS/SCHEDULE</u>
2 (IEB 79-05B Item 1)	Analysis of Anticipatory Filling of OTSG	This analysis and resulting guidelines have been reviewed by us in draft form and will be provided in final form by October 15, 1980.
4	Design Detail for the New Fuel Handling Building Ventilation System	This system will be used to mitigate a fuel handling accident and is not needed during power operation. This modification is not scheduled to be installed until the first refueling after restart. A conceptual description was provided in Amendment No. 18 to the Restart Report. Design detail will be provided by June 1981.
5	Plans for Storage of Low Level Radwaste Prior to Shipment	Space for storage of TMI-1 radwaste has been allotted in the waste storage area to be provided for TMI-2. This facility is expected to be completed by August 1981. Additional details will be provided by October 15, 1980.
8 (2.1.3.a)	Justification for Safety Valve Position Monitors	NRC has not documented the nature of their concern; therefore, we are unable to respond appropriately.
8 (2.1.3.b)	Evaluation of the Need for Additional Instruments to Detect Inadequate Core Cooling	Our position is that the inadequate core cooling guidelines submitted in December 1979 are complete and that no additional instruments are necessary or desirable. NRC has not yet identified to us any needed improvements in the inadequate core cooling guidelines.

<u>ORDER ITEM NO.</u>	<u>OPEN ITEM DESCRIPTION</u>	<u>STATUS/SCHEDULE</u>
8 (2.1.4)	Design Detail for the Rupture Detection Isolation for ICCW and NSCCW	This system was conceptually described in Amendment No. 18. On the basis of that information, the NRC should be able to rule on the acceptability of our approach and confirm that these conceptual ideas have been achieved. These will be incorporated in the detailed design at a later date. The details of the design will be available by January 1981.
8 (2.1.6.b)	Study of the Need for Plant Shielding	Submittal of the study has been delayed pending finalization of modifications to correct any problems. This study will be provided without definition of corrective measures by October 15, 1980, since the need to identify modifications has been delayed by Reference 2 (see Item II.B.2). Modifications to correct any problems will be described by June 30, 1981.
8 (2.1.7.a)	Design Detail of Revised OTSG Level Indication	We have reviewed the design of the NNI and have concluded that it is more feasible to provide new level indicators independent of the NNI than to modify the NNI. As part of the remote shutdown panel requirements for fire protection, new instruments meeting the single failure criteria will be provided. These instruments will be installed initially as control grade before restart, and later replaced with safety grade instruments as they become available and plant conditions

<u>ORDER ITEM NO.</u>	<u>OPEN ITEM DESCRIPTION</u>	<u>STATUS/SCHEDULE</u>
8 (2.1.7.a) Cont'd.	Design Detail of Revised OTSG Level Indication	permit. Conceptual design information will be provided by October 15, 1980. Design details will be available by January 1981.
8 (2.1.8.a)	Post Accident RCS Sampling System Design	Implementation of this system has been delayed until January 1, 1982 by Reference 2 (see Item 11.B.3). In addition, Reference 2 has also changed the design re- quirements for the system. As indicated in Amendment 18, our effort will continue to be directed toward demonstrating that the existing sampling system (with minor modifications) can meet the NRC requirements. Final justification will be provided by October 30, 1980.
8 (2.1.8.b)	Design Details for the Long-Term High Range Radioeffluent Monitors	This item has been delayed until October 1, 1981 by Reference 2. We expect to be able to install the long-term effluent monitors before restart; however, equipment delivery is uncertain. In the event it be- comes apparent that the long-term system will not be available, procedures will be prepared to provide for effluent monitoring using the short-term modifications accepted in the SER to support restart. A detailed description of the long-term system will be provided by May 1981.
8 (2.1.9)	NRC Review of Inadequate Core Cooling Guidelines that were Submitted in December 1979	As discussed in 8 (2.1.3.b) above, we are waiting for the NRC to identify any areas in which the guidelines need to be improved.

<u>ORDER ITEM NO.</u>	<u>OPEN ITEM DESCRIPTION</u>	<u>STATUS/SCHEDULE</u>
8 (Add. 4)	Design Detail and Analysis for the RCS High Point Vents and RV Head Vent	The implementation of this item has been delayed to January 1, 1982 by Reference 2. We expect to be able to provide a conceptual description of the RV head vents, that we were directed to install, by October 15, 1980. Detailed design information for the entire venting system as described in Section 2.1.2.2 of the Restart Report will be provided by March 1981. Analysis of the effects of hydrogen addition to the Reactor Building will be provided by October 15, 1980.
2 Long-Term	Responses to the NRC Letters dated August 21, 1979 and November 21, 1979	Responses to the NRC letters were filed on June 30, 1980 (TLL-285).