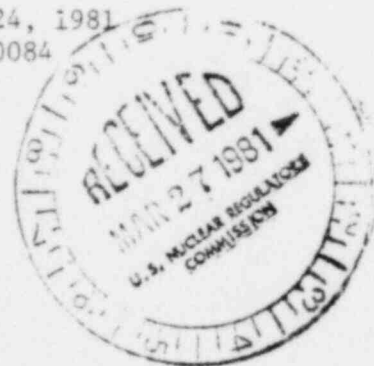




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Writer's Direct Dial Number

March 24, 1981
LL2-81-0084



Division of Operating Reactors
Attn: Darrell G. Eisenhut, Director
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
10CFR50 Appendix R

This letter is submitted subject to 10CFR50.48c6 concerning the recently implemented Appendix R Fire Protection Program requirements. Specifically, with regards to Section III G, J, and O and open SER items, the licensee is requesting exemption from the completion time requirements of 10CFR50.48c based on the following.

10CFR50 Appendix R Section III G - "Fire Protection of Safe Shutdown Capability"

This section requires that "Fire protection features shall be provided for structures, systems and components important to safe shutdown." The TMI Unit 2 facility is currently and will remain in a cold shutdown condition for some time to come. Since the accident in March 1979, the Unit 2 facility has progressed to its present cold shutdown condition which requires no active support for adequate core cooling, i.e. maintenance of the cold shutdown condition. Passive heat removal via loss to ambient, if not used exclusively during recovery, will remain a viable option for core cooling until the eventual removal of the fuel from the core.

For this reason, coupled with the fact that the facility will not experience power levels during the recovery period such that Section III G(1)a could apply (Hot Shutdown), the licensee requests exemption from the requirement of the above referenced fire protection regulation for the remainder of the recovery mode. This request is made as provided for in 10CFR50.48c6 where "required modification would not enhance fire protection safety in the facility. . .".

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10CFR50 Appendix R Section III J - Emergency Lighting

The capacity of the existing emergency lighting units installed in the Unit 2 facility is acceptable per the SER. In addition,

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the existing units satisfy the new Appendix R Section III J requirements. Therefore, no upgrading is required in Unit 2 to satisfy Appendix R Section III J except as may be necessary as a result of improvements resulting from Section III G modifications performed sometime after the recovery period.

10CFR50 Appendix R Section III O "Oil Collection System for Reactor Coolant Pump"

This section requires that "the reactor coolant pump shall be equipped with an oil collection system if the containment is not entered during normal operation." "Such collection systems shall be capable of collecting lube oil from all potential pressurized and unpressurized leakage sites in the reactor coolant pump lube oil systems."

As stated in regards to Section III G above, the Unit 2 Facility is in a cold shutdown mode requiring no active support, in this case reactor coolant pump (RCP) operation, for maintenance of proper decay heat removal.

Furthermore, the RCP's cannot be operated while the RCS parameters are so low as to not meet the RCP's minimum NPSH requirements. This condition will remain for the duration of the recovery mode. Therefore, the licensee requests exemption from the requirement of the above regulation for the remainder of the recovery mode. This request is made as provided for in 10CFR50.48c6 where "required modification would not enhance fire protection safety in the facility. . .".

Fire Protection Safety Evaluation Report - Open Items

Additional hose stations and sprinklers systems committed to in the SER section noted below are incomplete as of the present time.

Section 9.0 Auxiliary System

Paragraph 9.5 Fire Protection Systems

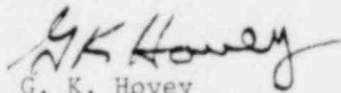
Subsections - Fire Hose Stations Systems and

- Automatic Water Suppression in Diesel Room Basement"

Owing to the fact that these open items originated from same shutdown concepts preceeding Appendix R Section III G, the licensee believes the same reasoning expressed relevant to section G above applies here also. Therefore, the licensee requests exemption from the time limit

requirements of 10CFR50.48c for the remainder of the recovery mode. This request is made as provided for in 10CFR50.48c6 where "required modification would not enhance fire protection safety in the facility. . .".

Sincerely,



G. K. Hovey
Vice-President and
Director, TMI-2

GKH:SDC:djb

cc: L. Barrett, Deputy Program Director
Dr. B. J. Snyder, Program Director-TMI Office