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Writer's Direct Dial Number

October 20, 1980  
TLL 392

Office of Nuclear Reactor Regulation  
Attn: D. G. Eisenhut, Director  
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  
TMI-2 Related Requirements

This letter is in response to your letter of May 7, 1980, and supplements our initial response of June 30, 1980, concerning the five additional TMI-2 related requirements to operating reactors.

I.A.1.3 Shift Manning

RESPONSE - The manning requirements you have provided have been incorporated into a new Unit 1 Administrative Procedure, "Conduct of Operations." This procedure is currently being reviewed and is expected to be approved by January 1, 1981.

The overtime requirements have been incorporated into a new Unit 1 Administrative Procedure "Nuclear Plant Staff Working Hours." This procedure has been approved and is presently in effect.

I.A.3.I Revised Scope and Criteria for License Examination

RESPONSE See our response to the June 30 letter.

I.C.5 Procedure for Feedback of Operating Experience to Plant Staff

RESPONSE Attachment 1 describes the system in use at TMI with respect to this item. A procedure delineating the system will be implemented by January 1, 1981.

II.K.3 Final Recommendation of B&O Task Force (Measures to Mitigate Small Break Loss-of-Coolant Accidents and Loss of Feedwater Accidents)

RESPONSE See sub items to this category individually listed below.

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II.K.3.1 Provide the design for the automatic closure of the PORV block valve by July 1, 1981

RESPONSE This activity is on hold pending completion of Item II.K.3.2 below.

II.K.3.2 PWR vendor reporting on PORV failure reduction to be provided by January 1, 1981

RESPONSE Met-Ed expects to participate with the B&W Owners Group to initiate a generic B&W Owners response to this item.

II.K.3.3 Reporting safety and relief valve failures and challenges

RESPONSE The requirements to report future failures promptly and future challenges in the annual reports will be captured in the TMI-1 Technical Specifications per Technical Specification Change Request No. 93. The request for a report on failures and challenges as of April 1, 1980 has been satisfied by a previous submittal dated January 18, 1980 (TLL 028).

II.K.3.5 Licensee evaluate alternate solution to reactor coolant pump trip during LOCA and provide study by January 1, 1981

RESPONSE It is Met-Ed's opinion that adequate code development will take place in the future. These codes, when used to model small break LOCAs, will identify whether or not the reactor coolant pumps must be tripped. In the interim, Met-Ed is proceeding with an automatic reactor coolant pump trip based on the coincidence logic of low pressure and loss of saturation margin. The criteria for the automatic pump trip is documented in the restart report and we are working with B&W to confirm the technical acceptability of such a trip for the short-term.

II.K.3.17 Licensee to provide a report on the outage of ECC systems over the last five years by January 1, 1981

RESPONSE No system presently exists at TMI-1 to compile the requested information without an exhaustive search of microfilmed documentation and control room logs. It is unclear exactly what criteria should be used to determine when the ECCS was in an outage condition. Further guidance and information on this item is requested.

II.K.3.25 Licensee to provide results of evaluation on the effect of loss of AC power on pump seals by January 1, 1982

RESPONSE This item was previously answered by a letter dated June 30, 1980 (TLL 285).

II.K.3.29 Evaluation of natural circulation with non-condensibles by April 1, 1981

RESPONSE This item was deleted by a letter dated June 9, 1980 from the NRC.

II.K.3.30 Revise small break LOCA methods by January 1, 1981

RESPONSE See response to item II.K.3.31 below.

II.K.3.31 Plant specific calculations to show compliance with 10CFR 50.46 by January 1, 1983

RESPONSE Met-Ed plans to participate in the B&W Owners Group to prepare a generic response to these items. However, we feel that our existing analyses fulfill the requirements of 10CFR 50.46 and Appendix K.

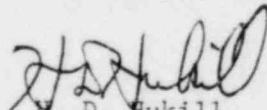
II.K.3.44 Evaluation of Anticipated Transients with Single Failure by January 1, 1981

RESPONSE This item was deleted by a letter dated June 9, 1980 from the NRC.

III.D.3.4 Control Room Habitability

A schedule for the necessary modifications will be completed by January 1, 1981, and the modifications determined necessary will be completed by January 1, 1983.

Sincerely,

  
H. D. Muckill  
Director, TMI-1

HDH:DGM:hh

Attachment

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

OPERATING EXPERIENCE REVIEW SYSTEM FOR  
THREE MILE ISLAND ONE AND TWO

The Plant Analysis Section of GPU Service Corporation will act as the clearinghouse for all information pertaining to nuclear industry operating experience. This Section will perform the initial review to screen for significance and applicability, assign action items, distribute information and follow up on outstanding action items. Correspondence from regulatory agencies will be reviewed for its value as operating experience, but action item tasking and follow up on regulatory commitments will be performed by the Licensing Section.

The object of the review is to identify significant events both from within the GPU system and from outside sources, ensure lessons learned from these events are brought to the attention of appropriate departments and that action is taken to assure the continued safe operation of GPU nuclear generating stations.

Operating Experience Review shall encompass monitoring the technical performance of GPU system plants during routine operation, analyzing unplanned transients of GPU system plants, and reviewing LER's and other events and information that become available.

LER review shall consist of the review of LER summaries for plants of similar design to GPU system plants. This review will identify significant events that may apply to the operation or design of GPU system plants. The remaining set of LER summaries will be reviewed either directly or in conjunction with other programs such as the NSAC Significant Event Information Network (SEE-IN). Events identified as significant will be assigned as action items to the specific departments concerned with the event. Completion of assigned items will be checked by an Action Item Tracking System.

Other NRC correspondence such as Bulletins, Circulars, Information Notices, etc., shall be reviewed in the same manner as LER summaries. If additional value can be gained from the item beyond the action the Licensing Section has required, another action item can be assigned.

Significant events that have immediate interest to the Plant Staff shall be expeditiously distributed for information prior to assignment of an action item. Information on such events will be gathered by direct contact of the affected utility or through information networks such as the NSAC NOTEPAD System.

Monitoring of routine operation will be done by gathering operating data from the plant process computers and other recording devices as necessary, and determining whether plant systems and equipment are operating as designed.

Unplanned transients will be analyzed to determine the cause of the transient, whether equipment performance was normal, whether operator actions were correct and whether procedures affected the course of the transient. This analysis will be done either in conjunction with the normal reactor trip report prepared by the plant staff or through a separate report. The unreduced data from the transient will be stored for future reference.

Other events identified by any other departments should be sent to the Plant Analysis Section for review and assignment of action. This will provide additional events from diverse sources for inclusion in the Operating Experience Review Program and reduce duplication of efforts by having a single group act as an operating experience information clearinghouse. Actions recommended by the forwarding group will be assigned and tracked by the Action Item Tracking System.

Items considered to be of interest or importance to operators are included in the Industry Experience Review which is part of the operator training program. Additionally, bulletins, circulars and notices are considered for applicability to operating personnel and if so, are included in the operator training program.